

APPROVED
by the Board of Directors
of PJSC TransContainer
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ANTI-CORRUPTION POLICY
of PJSC TRANSCONTAINER

I. General provisions

1.1. Anti-corruption policy of PJSC TransContainer (hereinafter referred to as the Anti-corruption policy) is designed to meet the requirements of the Russian and international (foreign) laws in the field of preventing and combating corruption, the Charter of PJSC TransContainer, other internal normative documents of PJSC TransContainer and provides for:

aims and objectives of anti-corruption policy;

basic principles of anti-corruption policy;

scope of anti-corruption policy and responsibility for non-compliance with the anti-corruption policy of PJSC TransContainer;

role of management and control authorities, managers and employees of the company in the implementation of anti-corruption policy. 1.2. Anti-corruption policy uses the following basic terms and concepts:

associated persons - managers and employees of PJSC TransContainer, contractors and other persons acting on behalf of and/or in the interests of PJSC TransContainer;

bribe - receipt by an official, foreign public official or an official of a public international organization, personally or through an intermediary, of money, securities and other property, either in the form of illegal providing of services of proprietary nature, provision of property rights for committing actions (inaction) in favour of the payer or the persons represented by him, if such actions (inaction) are under the authority of the official, or the official due to his position can facilitate such actions (inaction) as well as for general protectorship or connivance at work;

abuse of authority - use of powers contrary to the legitimate interests of the Company by a person who performs management functions in a commercial or other organisation, in order to get benefits and advantages for himself or other persons or causing harm to other persons;

commercial bribery - illegal transfer of money, securities, other assets, provision of services of property nature, granting of property rights to a person who performs management functions in a commercial or other organisation, for committing actions (inaction) in connection with the official position of that person;

contractors - Russian or foreign legal entities and physical persons, with whom PJSC TransContainer enters into contractual relations, except for labour relations;

conflict of interest - any situation in which personal interest of managers and employees of PJSC TransContainer may result in improper performance of their duties in relation to PSC TransContainer, the contradiction occurs or is likely to occur between personal interests of managers and employees of PJSC

TransContainer and interests of PJSC TransContainer that can lead to damage to property and/or business reputation of PJSC TransContainer;

Corruption (corruption actions) - offer, giving, promise, extortion or receipt of bribery, mediation in bribery, payments to simplify administrative, bureaucratic and other formalities, in any form, including in the form of money and other valuables, services or providing/receiving undue material or immaterial benefits from any persons/organizations or by any persons/organizations, including State representatives, public organizations, private companies and politicians.

Employee - an individual entered into employment relationships with PJSC TransContainer

Managers - Director General, members of the Board, first deputies General Director, Deputies General Director, Directors of the administration areas, Chief Accountant, Chief Engineer, directors of branches of PJSC TransContainer.

II. Aims and objectives of Anti-corruption policy

2.1. Anti-corruption policy is aimed:

to form a uniform understanding of rejection of corruption in all its forms and manifestations by PJSC TransContainer among managers and employees of PJSC TransContainer, members of the Board of Directors of PJSC TransContainer, TransContainer shareholders, investment community, contractors and other persons;

to ensure compliance of PJSC TransContainer with the applicable Russian and international (foreign) anti-corruption legislation;

at minimization of risks of corruption.

2.2. Objectives of Anti-corruption policy include:

clarifying of the position of PJSC TransContainer of rejection of corruption in all its forms and manifestations;

creation of normative base to regulate the activities of PJSC TransContainer in the field of counteraction of involvement into corruption activities;

training and informing of managers and employees of PJSC TransContainer about the requirements of the legislation of the Russian Federation in the field of counteraction of corruption and responsibility for corruption offences;

summarizing and explanation of anti-corruption measures applied in PJSC TransContainer;

assessing the anti-corruption activities of the Company.

III. Principles of anti-corruption policy

3.1. Anti-corruption policy is based on the following principles:

1. Compliance with applicable laws and generally accepted standards.

PJSC TransContainer is based on the principle of the need for compliance with applicable Russian and international (foreign) laws in implementing anti-corruption activities, as well as with generally accepted standards.

2. Personal example of the management ("tone at the top").

Members of the Board of Directors and managers of PJSC TransContainer form a culture of intolerance of corruption by their own example and are responsible for the establishment of a system for preventing and combating corruption.

3. Rejection of corruption.

PJSC TransContainer adheres to the principle of rejection of corruption in all its forms and manifestations in all activities. This principle means a complete prohibition of commission of corrupt activities directly or through third parties managers and employees of PJSC TransContainer, as well as contractors of PJSC TransContainer, including mediation in its implementation, regardless of current business practices in any country. Managers and employees of PJSC TransContainer should also refrain from actions that could be interpreted as a willingness to commit or participate in the commission of any act of corruption in the interests or on behalf of PJSC TransContainer. Guided by the principle of rejection of corruption, PJSC TransContainer investigates messages of violations with signs of corruption in the prescribed manner.

4. Regular assessment of the risks of corruption.

Since economic, industry, legislative and operational conditions are constantly changing, the identification and assessment of risks of corruption is made constantly in the manner prescribed by the regulations of PJSC TransContainer. In assessing the risks of corruption the company examines all available information related to the risks of corruption, both from internal and external sources. The objective of assessment of risks of corruption is to define specific business processes and operations of PJSC TransContainer with the highest likelihood of corruption offences by managers and employees of PJSC TransContainer both for the purpose of personal gain and in order to obtain benefits for PJSC TransContainer. Information about the identified risks is the basis for the development of new anti-corruption procedures and analysis of the existing ones.

5. Application of appropriate anti-corruption procedures.

PJSC TransContainer adheres to the principle of the use of appropriate anti-corruption procedures, according to which the implementation and execution of accepted (in the frames of law) anti-corruption procedures is provided. Anti-corruption procedures and the procedure for their implementation are developed taking into account the risks of corruption, and are determined by the relevant regulations of PJSC TransContainer. Anti-corruption procedures are reviewed,

improved and updated to reflect the changes in the external and internal environment of PJSC TransContainer.

6. Due diligence in activities and management decisions.

PJSC TransContainer adheres to the principle of due diligence in collaboration with affiliated persons and makes reasonable efforts to minimize the risks of corruption. PJSC TransContainer develops procedures of checks of the associated persons for compliance with the principles of the anti-corruption policy PJSC TransContainer.

7. Continuous education and training.

PJSC TransContainer adheres to the principle of continuous education and training of managers and employees of PJSC TransContainer. Managers and employees of PJSC TransContainer, as well as other associated persons, all be informed, in the manner prescribed by the PJSC TransContainer order, about the requirement to comply with the provisions of the legislation of the Russian Federation in the field of counteraction of corruption and anti-corruption policy of PJSC TransContainer. PJSC TransContainer informs counterparts of the anti-corruption procedures of PJSC TransContainer in established order before starting cooperation with them. PJSC TransContainer deems it necessary to hold regular training of managers and employees on basics of fighting corruption, on requirements of the legislation of the Russian Federation in the field of combating corruption, provisions of the anti-corruption policy of PJSC TransContainer and the Code of business ethics of PJSC TransContainer, as well as other normative documents of PJSC TransContainer in the field of counteraction of corruption.

8. Regular monitoring of the effectiveness of anti-corruption procedures.

PJSC TransContainer organizes periodic and ongoing monitoring of the effectiveness of anti-corruption procedures, as well as monitoring of their implementation with a view to identifying shortages. Monitoring of the effectiveness of anti-corruption procedures is carried out in the manner determined by the normative documents of PJSC TransContainer.

9. Unavoidability of punishment

PJSC TransContainer makes all possible legitimate efforts to ensure unavoidability of punishment for the managers and employees of PJSC TransContainer notwithstanding the position held, working experience and other conditions in case of committing a corruption offence related to performance of their employment duties. Managers and employees of PJSC TransContainer are responsible for non-compliance with the provisions of the legislation of the Russian Federation in the area of corruption management and anti-corruption policy of PJSC TransContainer.

PJSC TransContainer collaborates with the enforcement authorities in the area of anti-corruption including during investigation of violations with the signs

of corruption in the order prescribed by the legislation of the Russian Federation. PJSC TransContainer reserves the right to disclose to the external users the information about the facts of corruption and the persons who violated the Law of the Russian Federation in terms of corruption management and Anti-corruption management in the order prescribed by the legislation of the Russian Federation.

10. Refuse from retaliatory sanctions.

PJSC TransContainer ensures that the following managers and employees of PJSC TransContainer, or other associated persons will not fall within the sanctions;

for refuse from bribery, performance or participation in commercial bribery, refuse from mediation in bribery (commercial bribery) including the cases when such refuse resulted in losses of PJSC TransContainer, or his commercial and/or competitive advantages were not obtained, as well as for refuse from performing other corruption violations in personal interests or in the interests of PJSC TransContainer;

for informing about the cases of abetting the employee of PJSC TransContainer to commit corruption violations;

for informing about the violation of Anti-corruption policy excluding the cases of misleading information.

PJSC TransContainer ensures confidentiality of the information about corruption violations received.

3.2. The managers and the employees of PJSC TransContainer shall ensure efficiency of the actions taken for corruption management in terms of their powers.

IV. Scope of Anti-corruption policy and responsibility for non-compliance

4.1. Anti-corruption policy is obligatory to follow for all managers and employees of PJSC TransContainer, being in labour relations with PJSC TransContainer, as well as for the members of the BoD of PJSC TransContainer.

Anti-corruption procedures of PJSC TransContainer may define the cases and the conditions where the Anti-corruption policy effects other associated persons (entering in another kind of contract relations with the company).

Anti-corruption policy is advisory in nature for compliance by the members of regulatory bodies and employees of PJSC TransContainer affiliates, as well as other companies with direct or indirect participation of PJSC TransContainer.

4.2. Managers and employees of PJSC TransContainer notwithstanding the position held are responsible for compliance with the Anti-corruption policy, as well as for the actions (omission) of his subordinates. The above responsibility is reflected in the formalized in the official duties of the managers and employees of PJSC TransContainer. The persons guilty in breach of Anti-corruption policy may be held disciplinary, administratively, tort or criminal liable upon initiative of PJSC TransContainer, enforcement authorities or other persons in the order and for

the reasons provided for the legislation of the Russian Federation, local regulatory acts and labour contracts, and in the corresponding cases and if eligible according to the standards of the UK Bribery Act 2010 and other legal acts of foreign countries where the Company holds business and intends to do it.

V. The role of Company governing and control bodies, managers and employees in implementation of Anti-corruption policy.

5.1. Efficient Anti-corruption policy management by PJSC TransContainer is achieved due to productive and prompt interaction of the following participants:

Board of the Directors;

Audit Committee;

Director General;

Internal Audit Service;

Unit (s) and/or person (s) responsible for corruption management;

Employees:

5.2. Functional roles among the above participants in terms of Company anti-corruption management are distributed as follows:

1. Board of Directors:

considers and approves Anti-corruption policy, as well as amendments and supplements to Anti-corruption policy;

controls efficiency of Anti-corruption policy implementation in the Company;

controls efficiency of alerting service functioning in respect for potential cases of unfair acts of Company employees and the third parties, as well as other violations in the Company;

controls implementations of measures taken by the Company executive bodies concerning the facts of informing about potential cases of unfair acts of Company employees and other violations.

2. The Audit Committee considers previously and prepares recommendations concerning the issues in the competence of the Board of Directors in terms of counter force against the unfair acts of Company employees and the third parties.

3. The Director General is in charge of arrangement of measures aimed at Anti-corruption policy principles and requirements implementation in the Company, including appointment of persons responsible for development of anti-corruption procedures, their implementation and control.

4. The Internal Audit Service makes an assessment for compliance of the Company anti-corruption management with the Company by-laws and standards, and prepares the corresponding recommendations based on the results of this assessment.

5. According to the regulatory acts of PJSC TransContainer Unit (s) and/or person (s) responsible for corruption management:

develop Company draft by-laws and local regulatory acts aimed at implementation of measures to prevent corruption;

reveal corruption risks;

takes measures of control aimed at reveal of corruption violations by the Company employees;

accepts and considers the messages about the cases of performance or induction to make a corruption violation by the Company employees, contractors or other parties;

ensures holding the training events in respect of issues of prevention and management of corruption and individual consulting of employees;

supports the authorized representatives of the supervision and enforcement bodies during inspections of Company business in terms of prevention and management of corruption;

supports the authorized representatives during the measures of extinction or investigation of corruption crimes, including special investigation activities.

6. Employees shall:

know and follow the principles of anti-corruption policies;

refrain from committing and (or) participation in corruption offences in the interests or on behalf of the Company;

refrain from actions that could be interpreted as a willingness to commit or participate in the commission of any act of corruption in the interests or on behalf of the Company;

immediately inform the line manager/structural unit or person responsible for the implementation of anti-corruption policies about cases of incitement to the commission of corruption offences;

immediately inform the line manager/structural unit or person responsible for the implementation of anti-corruption policies about corruption actions committed by other employees of the Company, contractors or other persons;

immediately inform the line manager or other responsible person about the possibility or emergency of a conflict of interest;

assist verification activities, preliminary audits and internal investigations, including provision of explanations, transfer of necessary documents and data within his competence and in the manner prescribed by the applicable law, internal documents and local normative acts of the Company.

VI. Reporting of violations with signs of corruption

It is impossible to provide recommendations for each situation that the employee of PJSC TransContainer can face. Therefore, in case an employee of

PJSC TransContainer doubts on the compliance of his actions/inaction with the legislation of the Russian Federation in the field of combating corruption, anti-corruption policy, the Code of business ethics of PJSC TransContainer and other normative documents of PJSC TransContainer, an employee should discuss the situation with the line manager and/or the person responsible for the implementation of anti-corruption policies.
