



Anticorruption policy

1.	General provisions	2
2.	Acts of corruption	6
3.	Anticorruption principles	8
4.	Cooperation in the field of anticorruption enforcement	10
5.	Policy acquaintance	10
6.	Anticorruption action management	11
7.	Corruption prevention measures	12
8.	Main directions of anti-corruption	13
9.	Notice about bending to committing corruption offenses	14
10.	Gifts and official entertainment expenses	15
11.	Charity	15
12.	Political and public activities	15
13.	Interaction with counterparties	16
14.	Interaction with intermediaries, agents and other persons	17
15.	Prevention and management of conflict of interest	17
16.	Responsibility for corruption offence	18
17.	Control and audit	19
18.	Revision procedure	19

1. General provisions

1.1 Terms, Definitions and Abbreviations

For the purposes of this Policy, the following terms, definitions and abbreviations are applied:

Bank means PJSC “Sovcombank”;

Bribe means material values (items, money, securities, etc.) transferred to or received by employees of the Bank or other persons; property rights; benefits, property-related services, services for an action (or vice versa inaction) provided free of charge, but payable, in the interests of a corrupter that any Bank employee or other person could, did or should have committed due to his service rank and / or official position.

Property rights include both the right to property, including the creditor's claim, and other rights that have a monetary value, for example, the exclusive right to the results of intellectual activity and visual identities equivalent to them.

Foreign official / Foreign Politically Exposed Persons means any appointed or elected official holding a post in a legislative, executive, administrative or judicial officials of a foreign State, and any person performing any public function for a foreign State, including a public agency or public enterprise (for example, a minister, mayor, judge or prosecutor).

Counterparty means an individual or legal entity, including a foreign individual or foreign legal entity, which is a party to civil law relations with the Bank, including a contractor, subcontractor and supplier.

Corruption offense means an unlawful act (in violation of anticorruption laws of the Russian Federation) that has signs of corruption, for which the legislation of the Russian Federation establishes civil, disciplinary, administrative or criminal liability.

Corruption (act of corruption) means:

- abuse of official position, bribe, abuse of authority, corrupt business practices or other unauthorized use by an individual (including an employee of the Bank) of his/her official position not in compliance with the legitimate interests of a company (including the Bank) and the State in order to obtain any benefits in the form of money, valuables, other property or property-related services, other property rights for themselves or for third parties, or the illegal provision of such benefits to a specified entity (including an employee of the Bank) by other individuals;
- doing abovementioned acts on behalf of or in the interests of the Bank.

Illegal rendering of property-related services means provision of any property benefits as a bribe, including the release of the bribe-taker from property obligations, for example, credit extension with an underestimated interest rate, provision of travel packages free of charge or at an underestimated value, repair of movable property, construction and repair of real estate, transfer of property, in particular vehicles, for temporary use, waiver of debt or obligations performance to other persons etc.

Bank's Internal Control Bodies mean the Bank's Governing Bodies, divisions and employees of the Bank that conduct internal control functions in accordance with the Bank's Charter and the Bank's internal statutory documents within the framework of existing internal control system of the Bank.

Bank's Governing Bodies mean the General Meeting of Shareholders, the Supervisory Board, the Chairman of the Management Board of the Bank (Chief Executive Officer) and the Management Board (collegial executive body of the Bank).

A representative of the state is a person who carries out professional service activities in the positions of the state civil service and receives a salary (remuneration) at the expense of the state budget.

Anticorruption Enforcement means activities of the Bank's employees, members of the Bank's Governing Bodies and Internal Control Bodies within the limits of their competence and authority:

- on the prevention of corruption, including identification and subsequent elimination of the causes of corruption (prevention of corruption);
- on identification, prevention, suppression, disclosure and investigation of corruption offense (combating corruption);
- on minimization and / or elimination of consequences of corruption offense.

Functions of state and municipal (administrative) management mean the authority of a public or municipal employee to make binding decisions on staff, organizational, technical, financial, material and technical or other issues concerning the Bank, including decisions related to the issuance of permits (licenses) to carry out a certain type of activity and (or) certain actions of the Bank, or to prepare drafts of such decisions.

Bank's employee - any individual who has entered into labor relations with the Bank, as well as members of the Management Board of the Bank and the Supervisory Board.

Third party - any individual or legal person with whom the Bank / Bank's employee interacts in the course of carrying out their activities / performing their functions (including, but not limited to, counterparties, customers, business partners, agents, intermediaries, contractors, as well as other persons, including government / local government bodies and their officials)

1.2 Scope of Application

This Anticorruption Policy (hereinafter referred to as the Policy) is an internal statutory document of the Bank, which:

- defines basic principles of anticorruption enforcement in the Bank and in relations between the Bank and third parties, including state and municipal organizations;
- establishes anticorruption standards (guarantees, restrictions or prohibitions that ensure the prevention or reduction of the impact of corruption on the Bank's operations, being unified for the Bank, all employees of the Bank, regardless of their position, functions performed, and duration of their work, as well as on third parties);
- establishes management and organizational framework of anticorruption enforcement.

The Policy reflects the adherence of the Bank, the Chairman of the Bank's Management Board, members of the Bank's Management Bodies, all subsidiaries and dependent structures of the Bank (insofar as they do not contradict the applicable law) and all Bank employees to high ethical and professional standards, to the principles of openness and honest business conduction, as well as to the Bank's striving to increase the level of corporate culture and to follow the best world corporate governance and business practices, and to increase the Bank's goodwill and its investment attractiveness.

The Chairman of the Management Board of the Bank and the Bank's Governing Bodies support and encourage the compliance of employees, counterparties and partners of the Bank with the anticorruption principles established by the Bank.

The requirements of the Policy are binding on the Bank's Governing Bodies, the Bank's employees regardless of their positions.

The general principles and standards established by the Policy also apply to third parties, including persons who provide services to the Bank on the basis of a civil law contract, agents, consultants, counterparties, representatives of the Bank, in cases where the relevant obligations are enshrined in agreements with them, or directly follow from the requirements of the applicable anti-corruption legislation. Neither the Bank, nor any of the Bank's employees have the right to circumvent the requirements of the Policy through the activities of other third parties.

This Policy is recommended for compliance with the Bank's affiliated, subsidiary and dependent structures to the extent that it does not contradict the applicable laws.

All affiliated, subsidiary and dependent structures of the Bank are recommended to approve their Policies based on the principles and standards of this Policy.

The initiator of the Policy is the Compliance and Fraud Management Department.

1.3 List of Reference Documents.

The Policy has been developed taking into account the requirements of the following legislative, statutory, regulatory and other documents:

- Federal Law No. 273-FZ dated December 25, 2008 "On Counteracting Corruption";
- Federal Law No. 86-FZ dated July 10, 2002 "On the Central Bank of the Russian Federation (the Bank of Russia)";
- Federal Law No. 79-FZ dated July 27, 2004 "On Civil Service in the Russian Federation";
- RF Presidential Edict No. 309 dated April 02, 2013 "On Measures for Realization of Particular Provisions of the Federal Law "On Counteracting Corruption";
- RF Presidential Edict No. 460 dated April 13, 2010 "On National Strategy of Counteracting Corruption for Years 2010-2011";
- Enactment of the Government of the Russian Federation dated January 21, 2015 No. 29 "On Approval of Regulations on Notifying about Conclusion of Labor or Civil Law Contracts of Works (Services) with Citizens sitting in for Positions of National or Municipal Service, the List of which is Established by the Regulatory Legal Acts of the Russian Federation";
- Civil Code of the Russian Federation (Part Two) dated January 26, 1996 No. 14-FZ;
- Criminal Code of the Russian Federation dated June 13, 1996 No. 63-FZ;
- Code of Administrative Offences of the Russian Federation dated December 30, 2001 No. 195-FZ;
- Labor Code of the Russian Federation dated December 30, 2001 No. 197-FZ;
- Methodic Recommendations of the Ministry of Labour and Social Protection of the Russian Federation on Development and Acceptance of Measures for Prevention and Counteracting Corruption dated November 08, 2013;
- Resolution of the Plenum of Supreme Court of the Russian Federation "On Litigation Practice in Cases of Bribetaking and Other Corruption-Related Crimes" dated July 09, 2013 No. 24;
- United Nations Convention against Corruption (adopted in New York on October 31, 2003 by the Resolution, ratified by the Federal Law of the Russian Federation dated March 08, 2006 No. 40-FZ);
- Criminal Law Convention on Corruption (adopted in Strasburg on January 27, 1999 ETS No.173, ratified by the Federal Law of the Russian Federation dated July 25, 2006 No. 125-FZ);
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, adopted on November 21, 1997;
- Transparency International the 2010 UK Bribery Act Adequate Procedures Guidance on good practice procedures for corporate anti-bribery programmes;
- ICC Rules on Combating corruption;
- Transparency International Anti-corruption Plain Language Guide 2010.

1.4. Main Objectives of the Policy

Risk minimization of involvement of the Bank and Bank's employees of any level in corruption actions.

Prevention of corruption, establishment of uniform anticorruption requirements and procedures in the Bank for its employees, affiliates, as well as for persons providing services for the benefit of the Bank or on its behalf (for example: persons who render services to the Bank on the basis of civil law contracts, agents, intermediaries, representatives, contractors, etc.).

Systematization and clarification of the anticorruption legislation requirements and regulations of the Russian Federation, foreign States and international organizations (hereinafter referred to as the applicable anticorruption legislation) that can be applied to the Bank, its employees, members of governing bodies and third parties.

Formation of clear understanding among employees of the Bank, investors, shareholders, contractors and other persons that the Bank conducts honest and open activities and does not accept corruption in any of its forms and manifestations.

Establishment of the obligation for the Bank's employees to comply with the requirements of the Policy and related anticorruption procedures.

Establishment of personal responsibility for compliance with the principles and requirements of the Policy.

2. Acts of Corruption

Pursuant to the legislation of the Russian Federation, regulatory acts and practice of foreign countries in the field of counteracting corruption the Bank considers the acts specified in paragraph of the Policy as the acts of corruption committed:

- in respect of the Bank, either on behalf of or for the benefit of the Bank, in relation to third parties, including in relation to state and municipal bodies and their employees, the Bank of Russia and its employees, other legal entities and their employees, governing bodies and representatives of these legal entities;
- directly or indirectly (in person or through third parties);
- regardless of the purpose, including simplification of administrative and other procedures, ensuring competitive and other advantages;
- in any form, including in the form of receipt / provision of funds, valuables, other property or property-related services, other property rights.

Acts of corruption committed for the purposes, in the form or in the manner, are:

Acts of corruption committed for the purposes, in the form or in the manner, are:

Giving bribe and mediation in giving bribe, that is, providing or promising to provide any financial or other benefit / advantage with the intent to induce any person to perform his/her official duties inappropriately, that is, on more favourable conditions for the giver and / or with violation of practices and procedures established in accordance with the legislation of the Russian Federation and / or internal statutory documents of the Bank;

Acceptance of bribe and mediation in acceptance of bribe, that is, receiving or agreement to receive any financial or other benefit/advantage for the performance of their duties inappropriately, that is, on conditions that are more favourable for the giver and/or in violation of practices and procedures established in accordance with the legislation of the Russian Federation and / or internal statutory documents of the Bank;

Corrupt payment, that is, illegal transfer of money, securities, other property to a person performing managerial functions at the Bank, in commercial or other organization, provision of property-related services to such person, provision of other property rights for affirmative performance (failure to act) for the benefit of the giver in connection with the official position of this person;

Corrupt payment to foreign officials, that is, providing or promise to provide a foreign official with any financial or other benefit/advantage in order to influence the performance of his/her official duties, to obtain/retain a business or to provide competitive or other advantages for the Bank;

Use of opportunities by the Bank's Governing Bodies, Internal Control Bodies, the Bank's employees for themselves or in favour of third parties, related to their official positions and/or official powers to obtain financial or other benefits/advantages not provided for by the laws of the Russian Federation and / or internal statutory documents of the Bank;

Other illegal use of one's official position not in compliance with the legitimate interests of the Bank and/or society and/or the State in order to obtain financial or other benefits/advantages.

The Bank's employees, Governing Bodies and Internal Control Bodies are prohibited to commit the acts of corruption, including directly or indirectly, personally or through third parties, offer, give, promise, ask and accept bribes or make payments to simplify administrative, bureaucratic and other formalities in any form, including in the form of money, valuables, services or other benefits, to any persons and from any persons or organizations, including commercial organizations, public authorities and local self-governments, state and municipal officials, private companies and their representatives.

In addition, the Bank's employees should refrain from any conduct that may be construed by others as willingness to commit or participate in corruption offense for the benefit of or on behalf of the Bank.

The Bank's employees, Governing Bodies and Internal Control Bodies shall comply with the anticorruption legislation of the Russian Federation, national legislation of foreign countries and international rules in the field of anticorruption enforcement, as well as the requirements of the Policy, when performing their labour functions or performing their activities on behalf of the Bank

3. Anticorruption principles

Anticorruption principles and standards established in this Policy are the basis to organize the anticorruption system in the Bank, which ensures the coherence of approaches to the organization of anticorruption enforcement in the Bank and its affiliates.

Anticorruption enforcement in the Bank is based on the following basic principles:

Recognition, provision and protection of basic human and civil rights and freedoms - corruption leads to violation of the rights of citizens,

Protection of competition - corruption leads to non-compliance with the conditions of legitimate competition between economic entities

Legality - the Bank operates in accordance with requirements of the legislation of the Russian Federation;

Transparency of activities of the Bank's Governing Bodies and employees (subject to the requirements of the legislation of the Russian Federation on commercial and bank secrecy)

The inevitability of bringing to responsibility for committing corruption offense - the legislation of the Russian Federation provides for liability of individuals and legal entities for committing corruption offense (see section 16 of the Policy);

Integrated use of managerial, organizational, informational, social, economic, legal, special and other measures - the integrated use of anticorruption measures is focused both on the preventive work and on the direct fight against corruption and eliminating its consequences;

Priority application of corruption prevention measures (see section 6 of the Policy);

Cooperation in the field of counteracting corruption with government bodies, as well as partners and customers of the Bank - the Bank accepts the general social nature of the problem of corruption and the need for counteracting corruption both through the measures implemented within the framework of state policy and through the formation of intolerance to corruption on the part of society;

Cooperation in the field of counteracting corruption with government bodies, as well as partners and customers of the Bank - the Bank accepts the general social nature of the problem of corruption and the need for counteracting corruption both through the measures implemented within the framework of state policy and through the formation of intolerance to corruption on the part of society;

In the implementation of daily activities and strategic projects, including interaction with shareholders, investors, Bank's counterparties, representatives of state authorities and local self-government, political parties, employees of the Bank and its divisions, members of internal control bodies and other persons, the Bank observes the principle of Corruption non-acceptance in any form and manifestation (the principle of "zero tolerance")

Bank's senior officials are directly involved in promoting the internal corporate culture aimed at not-acceptance of corruption in all forms and manifestations, and also declare the uncompromising attitude to any forms and manifestations of corruption at all levels.

The Bank pays special attention when establishing correspondent relations, as well as business relations with legal entities and individuals registered / permanently residing in foreign States or foreign territories, which international sources relate to States or territories with a high level of corruption.

When implementing its activity, the Bank may face various risks associated with corruption. Such risks may be associated both with the implementation of activities in certain jurisdictions in which there is a high level of corruption, absence of properly implemented anticorruption legislation, etc., as well as with the implementation of certain operations and fulfilment of separate projects.

The Bank takes appropriate measures to identify, evaluate and reassess the emerging risks associated with the manifestation of corruption; the Bank analyzes potential risks – analysis of nature and magnitude of possible corruption risks that may arise at all stages of business processes implemented by the Bank, its affiliates and other third parties, depending on their structure and field of activity.

The Bank ensures the continuity of the Anti-Corruption process and monitors the relevance of the anti-corruption standards applied to prevent and minimize the impact of corruption risks on the Bank's activities by regularly monitoring the effectiveness of the anti-corruption measures implemented and by carrying out regular external and internal audits of compliance with the Policy requirements.

The Bank places the Policy on the Bank's corporate Internet website, declaring non-acceptance of the corruption and encouraging compliance with the principles and requirements of the Policy by all counterparties, employees, Governing Bodies, Bank's divisions and other persons and thus assisting in the strengthen of the society and the Bank's employees anticorruption culture.

4. Cooperation in the field of anticorruption enforcement

The Bank cooperates in the field of anticorruption enforcement with State, law enforcement and regulatory authorities, partners and customers of the Bank on the basis of the principle of reciprocity in order to:

Identify persons suspected (accused) of committing corruption offense, their location, as well as location of other persons involved in corruption offense.

Identify the property obtained as a result of corruption offense or serving as the means for committing corruption offence.

Exchange information on anticorruption issues.

Coordinate activities for the prevention of corruption and anticorruption efforts.

When concluding agreements, the Bank informs third parties about the basic principles of this Policy, primarily the principle of "zero tolerance" to corruption, as well as the consequences of non-compliance with this fundamental principle of cooperation, and makes reasonable efforts to ensure that third parties share and follow the principles of this Policy.

5. Policy acquaintance

The Bank makes reasonable efforts to inform and explain the Applicable Regulations and this Policy to the employees of the Bank.

The Bank conducts high-quality personnel training, which is one of the main methods used to build an internal control system in order to combat Corruption. The Bank regularly conducts mandatory training for the Bank's employees on Anti-Corruption and Bribery issues. If necessary, the bank conducts additional training of personnel, which is necessary in the event 10 of new legislative and regulatory requirements in the field of Anti-Corruption, as well as in order to increase the level of personnel knowledge. Based on the training results, Bank tests employees for knowledge and understanding of the main provisions of this Policy.

The Bank makes reasonable efforts to inform Bank's employees about the requirements and restrictions established by the Policy, namely: • publishes the Policy in the public domain on the official website of the Bank (<https://sovcombank.ru/about/pages/disclosure>)

When concluding an employment contract, each employee is acquainted with this Policy and signs a commitment to comply with this Policy.

6. Anticorruption action management

The Bank's governing bodies form an ethical standard of irreconcilable attitude towards any form of Corruption and set an example for the Bank's employees by including them into the general corporate system of ethical standards and compliance of the legal requirements.

The Bank's Supervisory Board approves the Policy and, within the framework of their credentials, executes general control over Anti-Corruption, carried out by the executive bodies of the Bank.

Executive bodies of the Bank within the framework of their credentials:

Determine the main directions of the Bank's activities in the field of Anti-Corruption.

Approve internal regulatory and organizational and administrative documents of the Bank in the field of Anti-Corruption.

Establish the competence of the Bank's divisions heads in the field of Anti-Corruption.

Carry out permanent monitoring of the Bank's employees activities in the area of Anti Corruption.

Resolve issues related to the implementation of procedures and holding measures to combat corruption and compliance with the requirements of applicable anti-corruption legislation.

Compliance and Anti-Fraud Department:

- receive notifications and messages about cases of violation, including possible violation of the Policy and applicable regulations through the established communication channels;
- collect and analyzes the necessary data regarding the received notification;
- generate data package for submission for consideration and decision making to the Chairman of the Management Board, Management Bodies of the Bank and Internal Control Bodies of the Bank

The governing bodies of the Bank and all Bank's employees, regardless of their positions, in their professional activities should follow the following basic principles:

- be honest and decent in business dealings, refrain from any dishonest ways of doing business;
- not to use the official position, official powers, confidential information, tangible and intangible assets of the Bank for personal purposes;
- not to admit in their professional activities unlawful and illegal actions, or actions that may raise suspicions about their legality and ethics;
- refrain from action or inaction that gives rise to conflicts of interest in business relations, strive to resolve the conflicts that have arisen on the basis of a balance of interests of the participants in business relations.

7. Corruption prevention measures

Prevention of Corruption in the Bank is carried out by:

- expressing the commitment of the Bank's Governing Bodies to the principle of "zero tolerance" to corruption, supporting and approval of such fundamental principles as integrity, transparency and accountability;
- development and approval of internal regulations aimed at combating corruption;
- determination of units or officials responsible for the prevention of corruption and other offenses;
- formation of intolerance to corrupt behavior among the Bank's employees;
- training and consulting the Bank's employees on Anti-Corruption issues;
- initial familiarization of the Bank's employees with this document and related documents when concluding an employment contract
- maintaining reliable and complete financial accounting, preventing the preparation of unofficial reports and the use of forged documents;
- verification of the Bank's compliance with the anti-corruption legislation of the Russian Federation, in particular, through internal control procedures, as well as through regular analysis of the implementation of these procedures;
- discussion and agreement with the Bank's counterparties standing orders and procedures that confirm the obligations of all parties to comply with the anti-corruption legislation of the Russian Federation;
- prevention and settlement of conflicts of interest
- Conducting anti-corruption expertise of internal organizational, administrative and regulatory documents of the Bank, contracts concluded by the Bank, including those that are at the stage of preparation and approval;
- Conducting an assessment of corruption risks in order to ensure compliance with anti-corruption requirements;
- ensuring the annual certification of compliance with anti-corruption policies for officials, as they are associated with a high level of corruption risk, as well as declaring a conflict / absence of a conflict of interest;

- presentation of the relevant requirements, established by the current legislation of the Russian Federation to the officials of the Bank and candidates for managerial positions in the Bank. The Bank implements a systematic approach to the process of agreeing on the appointment of candidates to managerial positions and dismissal from these positions;
- application in the personnel practice principles, according to which, when appointing to a higher position, a long, impeccable and effective performance by a Bank employee of his Anti-Corruption duties is taken into account;
- introduction of an effective and efficient methods of detecting violations, procedures for conducting an investigation and applying measures of responsibility for violations committed.

8. Main directions of anti-corruption

Implementation of unified anti-corruption policy of the Bank. Adoption of the Bank's code of corporate ethics.

Creation of a mechanism for the Bank's interaction on Anti-Corruption issues with government bodies, organizations, as well as with citizens and civil society institutions.

Taking measures aimed at attracting the Bank's employees to active and effective participation in the fight against corruption and at creation of a zero-tolerance attitude towards corrupt behaviour in the Bank.

Improvement of the internal control system of the Bank and the structure of divisions that are related to ensuring the safety of the Bank's activities, as well as the creation of control mechanisms over their activities.

Unification of the rights and restrictions, prohibitions and obligations established for the employees of the Bank.

Ensuring openness, fair competition and objectivity in the provision of banking services and in work with the Bank's counterparties.

Improvement of the procedure for using property and resources of the Bank, as well as improvement of the procedure for transferring rights to use such property and rights to alienate it. Development and implementation of standards and procedures aimed at ensuring the conscientious work of the Bank.

9. Notice about bending to committing corruption offenses

Employees of the Bank must notify their supervisors or the Compliance and Anti-Fraud Department of the Bank of all cases when any persons contact them in order to induce them to commit corruption offenses.

In the event of a violation (including potential violations and incidents of persuading the Bank's employees to commit corruption offenses) of applicable regulations, as well as violation of the Policy by Bank Employees, third or other parties, the Bank employee must / third party may apply to the open compliance line via one of the information channels:

- by email: anticorruption@sovcombank.ru
- by phone: +74957771111 ext. 13443
- fill out the feedback form on the official website of the Bank in the section "Compliance": <https://sovcombank.ru/about/pages/disclosure>

These information channels are designed to provide the Bank's employees and / or other third parties information about the intentions or facts of corruption actions against the Bank and / or its employees, customers, counterparties. Information is received 24 hours confidentially and, if necessary, anonymously.

In case of contacting the Bank's hotline on corruption violations, the contact center employee records the essence of the appeal, records the contact details of the person who applied and redirects the information received to the Compliance and Anti-Fraud Department for the further proceedings.

The notification is sent in any form. The Bank encourages disclosure of facts about the alleged or accomplished fact of Corruption, as well as about any other actions (inaction) that may or have led to violations of anti-corruption laws and / or the requirements of this document.

The Bank declares that none of the Bank's employees will be fined (fired, demoted, deprived of a bonus) if employee reported about the alleged or committed Corruption, or refused to give or receive a bribe, refused to commit commercial bribery or mediation in bribery, as well as if the employee reported actions (inaction) that may led or have led to violations of anti-corruption laws 13 and / or the requirements of this document, as well as if is within such a refusal, the Bank or affiliates of the Bank have lost profits or have not received commercial and competitive advantages.

The Bank declares that the identity of the Bank's employee will not be disclosed without his permission to third parties, including employees of the Bank to whom the message was transmitted, with the exception of cases provided for by applicable anti-corruption legislation.

The protective measures shall not be applied to an employee of the Bank who sent the message in bad faith, including on the basis of knowingly false information.

10. Gifts and official entertainment expenses

Any gifts, including for the purposes of business hospitality, shall comply with accepted business practice, stay within the business etiquette, be compatible with standards of business conduct, requirements of the PJSC Sovcombank's Procedure for gifts receipt and giving and charity funds transferring approved by the Bank Order, other Bank's internal documents and/or applicable anticorruption laws.

Official entertainment expenses, including expenses for the purposes of business hospitality, may be effected on behalf of and at the expense of the Bank, and services may be provided or rendered on behalf of and at the expense of the Bank only on the condition that entertainment expenses are directly related to the legitimate objectives of the Bank's activities, for example, with conducting of negotiations to establish and/or maintain mutual cooperation with clients (counterparties) of the Bank, as well as with organizing of an official reception and/or servicing of Bank's shareholders (representatives of shareholders), other controlling persons and their representatives who have arrived at the meetings of the Supervisory Board, Management Board and/or Shareholders General Meeting.

11. Charity

While providing charitable assistance and carrying out gratuitous sponsorship, the Bank does not pursue the goal of obtaining commercial advantages in any projects for itself and for its affiliates.

Requirements for charitable activities are specified in the Procedure for Receiving and Giving Gifts and Donating Funds to PJSC Sovcombank for charity, which were approved by the Bank's Order

12. Political and public activities

The Bank states that it does not finance any political parties, organizations and movements.

When interacting with representatives of the State, public organizations, politicians or other persons, the Bank complies with the requirements of applicable regulations.

The Bank refrains from paying any expenses of representatives of the state or public organizations, as well as their close relatives, or in their interests, including obtaining financial or other benefits at the expense of the Bank, with the direct or indirect purpose to obtain any commercial and/or competitive advantages;

Outside working hours, a bank employee has the right to participate in the political life of society. Employees of the Bank, when participating in political, religious or other social activities, are prohibited from offering, giving, promising, or making payments, depositing property, giving gifts, etc. on behalf of the Bank. Political campaigning or dissemination of one's political views or preferences is not allowed on the territory of the Bank.

Upon hiring, the employee is obliged to inform whether he/she was holding state or municipal service positions during the last two years.

13. Interaction with counterparties

When the Bank establishes contractual and other business relations with individuals and legal entities, the requirements of the Policy are taken into account. The Bank expects to comply with the relevant Anti-Corruption obligations, which are reflected in the Bank's agreements concluded with partners, counterparties, representatives of the Bank, as well as with other third parties, or which are required to comply in accordance with anti-corruption legislation.

When concluding agreements, the Bank:

Analyses information about the business reputation of potential partners and counterparties, their shareholders and beneficial owners, including their tolerance for corruption and the availability of administrative documents and procedures in the field of anticorruption enforcement.

Informs about the Banking principles and requirements in the field of Anti-Corruption, which were approved in this document, also by posting relevant information on the official website of the Bank.

Includes anticorruption clauses in agreements concluded with counterparties.

Promotes the implementation of anticorruption measures and advocates the adoption of similar anticorruption policy by a potential counterparty, as well as by the company or association to which the Bank is a member.

In order to create and maintain a culture of professional, reasonable and responsible attitude of the Bank's employees to conduct tenders and market research, the Regulations on Procurement of Goods, Works and Services of PJSC Sovcombank, as well as other internal banking documents regulating relations with partners are developed and are in force in the Bank.

To create and maintain a culture of professional, reasonable and responsible attitude among Bank employees for holding tenders and for conducting of the market research, the Bank has developed and carries out a Regulation for the purchase of goods, works and services for the needs of PJSC Sovcombank, as well as other internal bank documents regulating relationships with partners and contractors.

The Bank does not establish contractual relations with counterparties with the aim to commit illegal actions.

14. Interaction with intermediaries, agents and other persons

The Bank and all of its employees are prohibited from engaging or using intermediaries, agents, joint ventures or other persons to perform any actions that contradict the principles and requirements of this document and / or applicable anticorruption legislation.

The Bank makes every reasonable and available under the circumstances efforts to check intermediaries, agents and other persons in order to prevent and / or identify the violations 15 described above to minimize and suppress the risks of the Bank's involvement in corruption activities.

To comply with the principles and requirements stipulated by this document, the Bank makes all reasonable and available under the circumstances efforts to include anticorruption conditions / provisions / clauses in the agreements with intermediaries, partners, agents and other persons.

15. Prevention and management of conflict of interest

A conflict of interest is a situation when the personal interest (direct or indirect) of the Bank's employee, the Bank's Management Body affects or may affect the proper performance of his official duties, as well as when contradiction arises or may arise between the personal interest of a bank employee, or of the Bank's Management Body and the rights and legitimate interests of the Bank, citizens, organizations, society or the state, and which can harm the rights and legitimate interests of the Bank, citizens, organizations, society or the state.

The personal interest of a bank employee, which affects or may affect the proper performance of his official duties, is the possibility of obtaining income in the form of money, valuables, other property or services of a property nature, other property rights for himself or for third parties when the bank employee performs his official duties.

The personal interest of a member of the Bank's Management Body, which affects or may affect the proper performance of his duties, is the opportunity for obtaining income in the form of money, valuables, other property or services of a property nature, other property rights for himself or for third parties when the member of the Management Body performs his official duties.

In order to prevent and resolve conflicts of interest, the Bank's employees and Members of the Bank's Management Body are required:

- not to allow (exclude) circumstances that may lead to a conflict of personal interests of the Bank both in relations with third parties and within the organization;
- when performing their duties, be guided by the interests of the Bank, without taking into account their personal interests;
- to inform Supervisor or Compliance and Anti-Fraud Department about an arisen (real) or potential conflict of interest in accordance with the procedure established by the Bank, and assist the Bank in resolving the conflict of interest that has arisen.

Prevention or settlement of a conflict of interest may change the official position of Bank's employee who was a member of conflict of interest, up to and including his removal from the performance of his duties in accordance with the procedure established by the Bank, and / or his refusal from the benefit that was the cause of the conflict of interest.

16. Responsibility for corruption offence

The Bank's Governing Bodies and the Bank's employees, irrespective of their positions, are personally liable for observing the principles and requirements of this document, as well as for actions (omission) of their subordinates who violate these principles and requirements.

Since the Bank may be subject to sanctions for the participation of the Bank's employees, Bank's Governing Bodies, counterparties of the Bank, divisions of the Bank and other persons in corruption activities, official investigations are carried out for each reasonable suspicion or 16 ascertained fact of corruption in the manner established by the Bank within the limits admissible by the applicable legislation of the Russian Federation.

Persons who are guilty of violating the requirements of the Policy and anti-corruption legislation may be brought to disciplinary or civil liability at the initiative of the Bank, and if signs of an administrative or criminal offense were noticed in their actions, then at the initiative of law enforcement agencies or other persons, such employees may be brought to administrative or criminal liability in the manner and on the grounds provided for by the legislation of the Russian Federation.

The department responsible for the prevention of corruption offenses in the Bank is the Compliance and Anti-Fraud Department.

The Bank's actions aimed at detecting violations, conducting official corruption investigations, and applying measures of responsibility for violations committed are important elements of an effective anti-corruption policy, which provides adherence to ethical standards and ensures compliance with anti-corruption requirements.

In case of changing the names of divisions and/or positions of the Bank's employees involved in operations under the Policy, while retaining the functions defined for these divisions and/or Bank's employees, as well as if these functions are transferred to the competence of other divisions and/or the Bank's employees, the work under the Policy is fulfilled by the relevant divisions and/or the Bank's employees prior to the introduction of changes to the Policy

17. Control and audit

The Bank ensures regular monitoring of its anticorruption program, the effectiveness of the implemented anti-corruption procedures, as well as regular external and internal audits for the compliance with the requirements of this Policy in the manner and in accordance with the principles and standards provided in this document.

18. Revision procedure

The Policy is subject to timely review of its suitability, acceptability, effectiveness, based on the results of audits, as well as in cases of changes in labor legislation , anticorruption legislation, in case of changes in the Bank's internal approaches to anti-corruption issues by the Compliance and Anti-Fraud Department, at least once a year



2 0 2 1