

Business ethics and anti-corruption

Maintaining and developing a culture of trust and responsibility is one of the key priorities of the Exchange's strategy. MOEX adheres to high standards of conduct in its corporate business and takes a zero tolerance approach to corruption in any and all situations.

KEY PRINCIPLES OF MOEX'S BUSINESS ETHICS CODE

- ▶ respect for employees and provision of equal opportunities;
- ▶ ensuring occupational health and safety;
- ▶ combating corruption;
- ▶ preventing conflicts of interests;
- ▶ combating legalisation of income generated by illegal means and financing of terrorism;
- ▶ combating the use of insider information;
- ▶ protection of MOEX's assets, including intellectual property rights;
- ▶ observing non-disclosure of confidential information;
- ▶ maintaining trust-based relationships with clients and partners and adherence to strict business ethics;
- ▶ maintaining a neutral position with regard to political and religious activities (while not imposing restrictions on employees engaging in such activities in a personal capacity);
- ▶ pursuing a corporate social responsibility programme and adhering to sustainable development principles.

Key Principles of the Anti-Corruption Policy Approved in 2015:

- ▶ prohibiting any transfer/receipt of valuables (including gifts and incentive payments) to obtain assistance in solving any issue;
- ▶ prohibiting transactions with third parties acting on behalf or in favour of the Exchange;
- ▶ establishing a collective body to make a decision on entering into contracts;
- ▶ inclusion of anti-corruption clauses in contracts, vetting of all counterparties;
- ▶ providing employees with channels to inform of corruption risks (including anonymously).

COMBATING CORRUPTION

As part of its zero tolerance principle, the Exchange takes preventative measures with regard to both internal and external stakeholders, including by providing information and training to employees, developing mechanisms for receiving information about corruption risks, and including anti-corruption clauses in contracts with counterparties.

PLANS FOR 2020

In 2020, MOEX plans to continue implementing a roadmap to embed a compliance culture within the Group, including:

- ▶ take measures aimed at strengthening a culture of informing about corruption risks via the creation of a “single button” to inform of any risks;
- ▶ carry out several training sessions on corruption risk management;
- ▶ update the Group’s anti-corruption policy and ensure employees are familiar with its new methods and techniques;
- ▶ update the Group’s Business Ethics Code based on an analysis of best Russian and international practices with the inclusion of several new provisions and principles, including from the ESG and sustainable development perspective.