

APPROVED

by the resolution of the Supervisory Board
of the Moscow Exchange
24 December 2020, Minutes No. 17

ANTI-CORRUPTION POLICY OF THE MOSCOW EXCHANGE

Moscow, 2020

Table of Contents

1. General provisions.....	2
1.1. Terms and definitions.....	2
2. Anti-Corruption Policy goals and tasks. Anti-Corruption Policy principles	3
2.1. Anti-Corruption Policy goals	3
2.2. Anti-Corruption Policy tasks.....	4
2.3. Anti-Corruption Policy principles.....	4
3. Corrupt practices	5
4.2.1. Hotline.....	6
4.2.2. Anti-corruption measures in relations with Counterparties.....	6
4.2.3. Notifications of hiring former government and municipal officers	7
4.2.4. Gifts and hospitality expenses	7
4.2.5. Charity and sponsorship.....	8
4.2.6. Control of financial and business activities;.....	8
4.2.7. Conflict of interests	8
4.2.8. Awareness and learning	9
4.2.9. Corruption risk monitoring and assessment.....	9
5. Powers and responsibilities relating to the Fight against Corruption.....	10
6. Responsibility.....	11
7. Policy revision and final provisions	11
Annex 1	0

1. General provisions

1.1. This Policy for preventing corrupt practices in the Moscow Exchange (hereinafter, the Anti-Corruption Policy) defines a set of interrelated principles, procedures and specific measures towards preventing and suppressing corrupt practices in the Exchange.

1.2. This Anti-Corruption Policy is part of risk management and risk control system of the Exchange. The document defines the managerial and organisational framework for the prevention of corruption (acts of corruption), measures to minimise and/or eliminate the consequences of corruption offences, as well as such framework participants, tasks, functions, powers and responsibilities, including in relations with third parties, those including individuals and legal entities, governmental and municipal authorities and their representatives. Every Employee is personally responsible for the implementation of this Anti-Corruption Policy.

1.3. This Anti-Corruption Policy has been developed in keeping with the Russian Federation legislation, methodology documents and best global practices and standards.

1.4. The Moscow Exchange Group companies develop their own anti-corruption policies based on the principles and standards inherent in this Anti-Corruption Policy, with a reference to the specifics outlined in the current legislation of the Russian Federation with respect to operations of the Moscow Exchange Group companies.

1.1. Terms and definitions

Anti-Corruption Legislation refers to laws and subordinate legislation which apply to the Exchange in all applicable jurisdictions, including laws and subordinate legislation which apply extraterritorially (including but not limited to those listed in Annex 1).

Affiliated Parties mean individuals who have family ties (his/her spouse, parents, children, adoptive parents, adopted children, siblings (including half-sisters and half-brothers), or other relationships with any employee of the Exchange that may have affect their activities, as well as legal entities in which an Employee and/or his/her affiliate have the opportunity to influence decisions regarding activities of such a legal entity.

Exchange refers to the Moscow Exchange.

Bribe refers to taking by an official, a foreign official or an official of a public international organisation in person or through mediation, in the form of money, securities or other assets or in the form of unlawful rendering thereto services of property nature, or granting of other property rights, for actions (inaction) in favour of a bribe-giver or the persons he/she represents, if such actions (inaction) form part of the functionary's official powers or if the latter, by virtue of his/her official position, may further such actions (inaction), and also for overall patronage or connivance in the civil service.

Abuse of Authority refers to Employees' using their authority contrary to the Exchange's legitimate interests and for the purpose of obtaining benefits and advantages for themselves or for third parties, or causing damage to the Exchange and third parties.

Commercial Bribing refers to illegal transfer of money, securities or any other assets to a person who discharges managerial functions in a profit-making or any other organisation, and likewise unlawful rendering of property-related services, granting other property rights to him/her for actions (commissions to act) in the interests of the giver, in connection with the official position held by this person.

Counterparty refers to any Russian or international legal entity or individual the Exchange have entered into a contract with, other than employment.

Corruption refers to abuse of public office, bribe-giving, bribe-taking, abuse of powers, commercial bribing or other illegitimate use by an individual of his/her official status against legal interests of society and the State to receive private gain in the form of money, values, other property or services involving property, and other property rights for himself/herself or for third parties, or illegal provision of such a benefit to the said individual by other individuals, and committing of aforesaid acts on behalf or for the benefit of a legal entity.

Conflict of Interest refers to a situation where an indirect or direct personal interest, actual or potential benefit of an Employee, an Affiliated Party, or a member of corporate bodies of the Exchange affects or may affect fair and effective performance of their duties and may have an adverse effect on the Moscow Exchange, its customers and business partners.

Response Measures mean actions towards Employees or Counterparties in relation to confirmed facts of corruption offences taken based on decisions of the relevant authorised corporate bodies of the Exchange and implemented in the framework of the current Russian Federation legislation, the Exchange's internal documents and contracts.

Fight against Corruption refers to activities undertaken by Exchange's staff members within their power aimed to:

- a) prevent corruption, including detection and subsequent elimination of causes of corruption (prevention of corruption);
- b) detect, prevent, suppress, uncover, and investigate acts of corruption and commercial bribing that may occur;
- c) minimise and/or eliminate consequences of corrupt offences.

Hospitality Expenses include, but are not limited to, providing invitations (tickets and the like) or otherwise ensure your attendance at business or entertainment events, whether for lunches, social and/or cultural and/or sports and other events. Hospitality expenses may also include travel expenses, hotel and rental housing accommodation.

Public Official refers to any person performing, whether permanently or temporarily or in accordance with special powers, a public function, i.e. is vested with regulatory powers in relation to persons who are not dependent on him/her by employment as prescribed by law, as well as a person who performs organisational, administrative or administrative functions in governmental authorities, governmental non-budgetary funds of the Russian Federation, local authorities, governmental and municipal organisations.

Foreign public official shall mean any person holding a legislative, executive, administrative or judicial office of a foreign country, whether appointed or elected; and any person exercising a public function for a foreign country, including for a public agency or public enterprise (e.g. deputy, minister, mayor).

Official of a public international organisation shall mean an international civil servant or any person who is authorised by such an organisation to act on behalf of that organisation, members of parliamentary assemblies of international organisations where the Russian Federation has a membership, persons holding judicial positions in any international court with jurisdiction recognised by the Russian Federation.

Employee refers to a natural person engaged in an employment relationship with the Exchange.

Terms not expressly defined herein shall have the meaning attributed to them in the internal documents of the Exchange and the Russian Federation anti-corruption legislation.

2. Anti-Corruption Policy goals and tasks. Anti-Corruption Policy principles

2.1. Anti-Corruption Policy goals

This Anti-Corruption Policy is designed to identify, prevent and minimise the cases of unlawful,

unethical and corrupt behaviour of Exchange Employees. This Anti-Corruption Policy is aimed at forming a common understanding among all Employees of the Exchange of the essence of corruption actions, their forms and manifestations, in order to prevent and suppress the situations and actions that may potentially violate the requirements of Anti-Corruption Legislation.

2.2. Anti-Corruption Policy tasks

Anti-Corruption Policy tasks include, inter alia:

- establishing principles and rules of the Fight against Corruption for the Moscow Exchange;
- creating effective tools, procedures, control and other Anti-Corruption efforts and efforts to minimise the risk of involving the Exchange and its Employees, in corruption practices;
- developing an ethical behaviour culture and intolerance to all the manifestations of corruption, inter alia a common standard of anti-corruption behaviour among Exchanges Employees;
- notifying Employees and Counterparties about zero tolerance for corruption;
- summarising and explaining specific provisions and key requirements of the Anti-Corruption Legislation;
- integrating anti-corruption principles into strategic and operational management at all levels of the Exchange's operations;
- developing a common understanding of this Anti-Corruption Policy' principles by its Employees, Counterparties, shareholders, investors and other entities of the Exchange;
- informing corporate bodies of the Exchange of the corruption offences and measures taken to fight corruption;
- implementing responsibility measures for the corruption offence.

2.3. Anti-Corruption Policy principles

Zero tolerance: The Exchange is committed to the zero tolerance principle for Corruption. The zero tolerance principle means that Exchange Employees, members of corporate bodies and other persons acting on behalf of or for the benefit of the Exchange, directly or indirectly, personally or through any mediation, are strictly prohibited to engage in corrupt practices, regardless of business practice in a particular country.

The Exchange emphasises non-tolerance of corruption in relation to Public Officials, public groupings, private companies, politicians and other persons, as well as in relation to the Exchange Employees through abuse of their official position due to their personal interest or for the purpose of obtaining any personal benefit.

The Exchange does not tolerate corruption in any form, regardless of the amount of damage caused, and takes measures to fight corruption. The Exchange reserves the right to disclose information about persons violating the requirements of the Anti-Corruption Legislation and Anti-Corruption Policy in the manner and as specified in the current legislation of the Russian Federation.

Engagement of Employees: The Exchange ensures that Employees, whatever their job position is, actively participate in the development and implementation of anti-corruption standards and procedures. The Exchange ensures the coordination of efforts to fight corruption, as well as interaction with government authorities, local authorities and law-enforcement agencies while fighting against involvement of the Exchange in corruption practices.

Proportionality in anti-corruption procedures: The Exchange develops and implements a package of measures to reduce potential involvement of the Exchange, its managers and Employees in corruption activities, given the extent of risk identified. The Exchange strives to make procedures as transparent, clear, achievable and reasonably appropriate to the risks identified as possible.

Periodic risk assessment: The Exchange periodically identifies and assesses corruption risks specific to operations of the Exchange as a whole and to individual business units of the Exchange in particular.

Mandatory compliance checks of Counterparties: The Exchange checks the Counterparties for their tolerance for Corruption, including their willingness to comply with requirements of this Anti-Corruption Policy and to include anti-corruption provisions (clauses) in contracts, as well as to promote ethical business behaviour and prevention of corruption. Both the Exchange and its Employees are not allowed to engage any intermediaries, agents or other third parties acting on behalf of the Exchange or in its interests to perform actions that violate the Anti-Corruption Policy principles and requirements.

Openness: The Exchange informs its Counterparties, partners and the public about adopted anti-corruption standards

Monitoring and control of effectiveness and efficiency in the implementation of procedures: The Exchange systematically develops and improves the competences to fight corruption effectively and efficiently, regularly monitors the implementation and effectiveness of anti-corruption standards and procedures. The effectiveness of the Anti-Corruption System is independently assessed by internal auditors or third parties from time to time.

Responsibility and inevitability of punishment: The Exchange takes all legal efforts to protect its interests, ensure the safety of its assets and comply with the applicable Anti-Corruption Legislation. The Exchange investigates all reasonable reports on violations of anti-corruption procedures and brings the guilty parties to responsibility irrespective of their position, length of service or other factors in the event of corruption offences committed in the course of their job duties. The Exchange makes every reasonable and legal effort to stop violations as quickly and inevitably as possible. The management of the Exchange is personally responsible for implementing the Anti-Corruption Policy.

Principle of avoiding conflicts of interest: The Exchange takes measures to prevent conflicts of interest. The Exchange does not assign both the process implementation and the process monitoring/evaluation functions simultaneously to the same Employee in order to minimise chances to commit and hide corruption.

3. Corrupt practices

3. 1. In accordance with the Anti-Corruption Legislation and for the purposes of this Anti-Corruption Policy, any of the following, whether committed directly or indirectly, in person or through third parties, shall be classified as corrupt practices:

- bribe giving or taking;
- bribery mediation;
- abuse of official position, abuse of authority;
- commercial bribing;
- mediation in commercial bribing;
- illegal use by officials of their official positions for their benefit, or illegal benefit or right giving to such a person by other persons

3. 2. Employees are not allowed to perform and/or participate in any manner in any of the actions specified in Clause 3.1. herein.

4. Anti-Corruption System

4. 1. Prevention of corrupt practices

4.1.1. The Exchange builds a corporate culture that values integrity and ethics and is based on the unacceptability of Corruption at all levels of the organisation.

4.1.2. The Exchange forms a robust internal control system, implements a set of anti-corruption measures which is based on the assessment of the Exchange's risks in overall and individual processes in particular. These anti-corruption measures are consistent with internationally recognised standards, they limit the chances of corrupt practices and foster corrupt identification.

4.1.3. The Exchange develops a training system for its Employees in the areas of business ethics, conflict of interest management and the Fight against Corruption.

4. 2. Anti-Corruption Efforts

4.2.1. Hotline

If an Exchange Employee becomes aware of corruption offences committed by other Employees, Counterparties or other persons, or of any inducement to commit corruption offences in the performance of professional functions, he/she should immediately report it via the Speak Up! hotline, providing sufficient information to identify the offence. Employees may report anomalously. The hotline operation is regulated by the Exchange's internal documents.

4.2.2. Anti-corruption measures in relations with Counterparties

To minimise the risk of business relations with Counterparties that may be involved in corrupt practices, the Exchange performs due diligence on its Counterparties, absence of conflicts of interest, relations with Public Officials and Exchange Employees. The authorised bodies approve transactions based on requirements of the current legislation of the Russian Federation and internal documents of the Exchange.

Striving to ensure transparency of its procurement procedures and prevent any abuse, the Exchange has created the Procurement Committee. The Procurement Committee members are appointed and decisions on issues within the competence of the Procurement Committee are made in accordance with the Regulations on the Procurement Committee of the Moscow Exchange. The applicable procurement procedures are set out in the Procurement Regulations of the Moscow Exchange.

Anti-corruption provisions (clauses) are also included in the contracts. An anti-corruption clause must be included in the Exchange's contracts with its Counterparties in the following cases:

- inclusion of an anti-corruption clause in the standard form of the contract developed by the Exchange;
- there are no anti-corruption provisions (clauses) in the draft contract developed by the Counterparty.

The Legal Department ensures that an anti-corruption clause is included in the standard form of contract developed by the Exchange. The Procurement Office ensures that an anti-corruption clause is included in the contracts the Procurement Office drafts.

In the event that the Legal Department receives for approval a non-standard contract that does not have any anti-corruption provisions (clauses), the Legal Department shall send to the party initiating the contract a comment to get approval of such contract from the Internal Control and Compliance Department. The Internal Control and Compliance Department informs the party initiating the contract that an anti-corruption clause should be included in the contract and analyses the contractor' refusal to include anti-corruption clauses in the contract.

If a situation reveals signs or gives grounds to believe that there is a risk of corruption on the part of the Counterparty, the Exchange may exclude such Counterparty from the list of its partners.

If there is a suspicion of corruption risk in relations with the Counterparties, Employees report this through the Speak Up! hotline. Counterparties can use the Compliance Hotline in the Compliance section of the Exchange's official website to report corruption risk to the Exchange.

4.2.3. Notifications of hiring former government and municipal officers

Should a labour agreement or a civil law contract for works (services) be concluded with an individual who has previously occupied any government or municipal positions in any agency listed in the Russian Federation laws, presidential decrees, government resolutions, legal documents of federal executive authorities (hereinafter, the current Russian Federation legislation) during two years after their leaving of the government or municipal position, the Exchange shall notify the individual's previous employer / its representative of the hiring in accordance with the Russian Federation legislation.

4.2.4. Gifts and hospitality expenses

4.2.4.1. Business gifts and hospitality expenses can be legally used to develop relationship, understanding and goodwill between companies.

4.2.4.2. Any and all gifts (promotional merchandise), hospitality, promotional and marketing expenses must meet the following criteria:

- they must be reasonable and must not be used to unlawfully influence a public official, politician, private company or other person for the Exchange to stay in business or obtain commercial or other benefits, or to induce another person to improperly perform his or her job duties and functions;
- they must not compromise the image or business reputation of the Exchange;
- they must comply with the Anti-Corruption Policy requirements and other internal documents of the Exchange, as well as with the current legislation of the Russian Federation.

In addition to the above, gifts may not be in the form of cash or non-cash money, or cash equivalents.

All gifts and hospitality expenses, advertising and marketing expenses are approved in accordance with the Exchange's internal documents and are accounted for properly accurately.

4.2.4.3 Exchange Employees are not allowed to give gifts and valuables of a value equalling to or exceeding RUB 3,000 to government officials, employees of the Bank of Russia and other persons specified in paragraph 1 of Article 575 of the Civil Code of the Russian Federation.

4.2.4.4. Exchange Employees are allowed to receive and give gifts to the Counterparties in connection with protocol events, business trips and other official events, as well as in connection with public holidays and memorable dates (anniversary, birthday and similar).

4.2.4.5. Employees are not allowed to accept gifts with value of more than RUB 10,000. If Employees receive gifts of a higher value, or if they doubt the gift value, or compliance with criteria set out in Clause 4.2.4.2 of this Anti-Corruption Policy, they must inform the Internal Control and Compliance Department and their immediate superior within 3 (three) working days after receiving such gifts. Messages to the Internal Control and Compliance Department are sent to: compliance-check@moex.com. The gift and the gift giver, if known, must be indicated in the message.

The Exchange Employee must follow the instructions received from the Internal Control and Compliance Department to mitigate the risk of corruption, this including returning the gift to the giver.

4.2.4.6. Employees order gifts on behalf of the Exchange through the corporate portal or by contacting the Communications Department.

4.2.4.7. It is not allowed to give gifts on behalf of the Exchange which value equals or exceeds RUB 3,000. In some cases, the Communications Department may agree on gifts of higher value.

If the gift value exceeds RUB 10,000, the Communications Department shall get approvals for giving the such gift from the Internal Control and Compliance Department by sending an e-mail request: compliance-check@moex.com.

4.2.4.8. The Exchange Employees are allowed to accept gifts from or give gifts to their colleagues if a gift has a symbolic meaning and is given only once in connection with a national holiday, anniversary, birthday and is accepted or given in accordance with generally accepted business etiquette rules and does not involve any connivance or illegal promotion.

4.2.4.9. The Exchange Employees are allowed to invite or accept invitations from Counterparties and government agencies to attend official events such as seminars, round tables, conferences and the like.

4.2.4.10. When Counterparties or Public Officials offer Exchange Employees to pay expenses for their participation in events (including accommodation, transportation) in amount that exceeds RUB 10,000, Employees need get approvals for accepting such an offer with their immediate superiors and the Internal Control and Compliance Department by e-mail: compliance-check@moex.com.

4.2.5. Charity and sponsorship

As a socially focused company, the Exchange supports charity projects with a long-term effect;

In its charitable and sponsorship activities the Exchange is guided by the following principles:

- Charity support is provided only based on decisions made by the Charity Policy Committee at the Executive Board of the Moscow Exchange; procedures for making and approving the Charity Policy Committee's decisions, as well as the objectives of the charity policy, are set out in the Regulations on the Charity Policy Committee at the Executive Board of the Moscow Exchange;
- Sponsorship funds are provided according to principles and rules defined in the Exchange's internal documents regulating the Exchange's sponsorship activities;
- Internal Control and Compliance Department pre-screens charity and sponsorship projects for any signs of corruption, conflict of interest, affiliation of recipients of charity or sponsorship funding, and organisers of sponsored events with Exchange Employees.
- Documents submitted by legal entities applying to the Exchange for charity or sponsorship financing are checked for their compliance;
- It is not allowed to participate in charity or sponsorship activities aiming at influencing Public Official, politician, private company or other persons illegally for the Exchange to stay in the business or to obtain commercial or other advantages for the Exchange, as well as to incline another person towards improper performance of his/her job duties and functions.

Seeking to reduce corruption risks, the Exchange adds anti-corruption clauses to its charity or sponsorship agreements.

4.2.6. Control of financial and business activities;

When reporting transactions and keeping accounting records, the Exchange is governed by the applicable Russian Federation legislation and standards. All financial transactions of the Exchange must be correctly and with sufficient detail reflected in the accounting, management and other records, must be documented and made available for inspection. The Moscow Exchange allows neither for non-recording of transactions in accounting, management and other records, no for data corruption and falsification.

4.2.7. Conflict of interests

Employees must not directly or indirectly influence decisions of the Exchange in case of a potential

or an actual conflict of interests, inter alia between private interests of their close relatives and/or family members, and the interests of the Exchange and its shareholders.

The conflict of interest is managed according to the List of Measures aimed at preventing conflicts of interest in the course of trading activities of the Moscow Exchange. Exchange Employees are obliged to inform the Exchange of any conflict of interests in the manner and within the time limits set out in the said document.

The Exchange checks compliance with internal documents designed to manage conflicts of interest. In the event of late notification of a potential or actual conflict of interest, the Exchange may bring non-disclosing persons to account in accordance with the procedure established by the legislation of the Russian Federation and the Exchange's internal documents.

4.2.8. Awareness and learning

The Exchange discloses its Anti-Corruption Policy in the Internet, openly declares its non-tolerance for corruption, and encourages its Counterparties and Employees to comply with Anti-Corruption Policy principles and requirements.

The Exchange contributes to the improvement of the anti-corruption culture by raising awareness and regular training among Employees. All Employees take training on the Fight against Corruption and Conflict of Interest Management at least once a year, and new hires take training within 30 days following their employment start date.

4.2.9. Corruption risk monitoring and assessment

Corruption risk assessment is a general process of corruption risk identification, analysis and ranking. Corruption risks are assessed based on a risk-oriented approach, which considers business processes, where corruption risks are more likely to occur.

The main criteria may include:

- the essence of the business process, which implies existence of persons seeking a benefit (advantage) distributed by the organisation and/or its individual employees;
- business process implies interaction with governmental (municipal) authorities, state corporations (companies) and organisations established to perform the tasks assigned to governmental authorities;
- business process involves agents and/or mediation;
- existence of persons concerned about obtaining information unavailable to them but which is held by employees of the organisation;
- information available on previous corruption offence occurrences when implementing a business process in the organisation or similar business processes in other organisations.

The Exchange assesses risks on a periodic basis in accordance with the risk management procedure applicable in the Exchange.

4.2.10. Prohibition on financing political activities

The Exchange neither finances nor otherwise supports politicians, political parties, or their members, including candidates for political office, or political movements.

4.2.11. Restrictions on the relationship with Public Officials

The Exchange does not pay expenses of Public Officials and of their close relatives (or on their behalf) to stay in business or to obtain commercial or other advantages.

4. 3. Identification of violations

The Exchange implements all the necessary measures and programmes allowed by Anti-Corruption legislation to identify corrupt practices, inter alia:

- 4.3.1. receiving notifications from Employees via anonymous Speak Up! hotline and from external parties via compliance hotline on the Exchange's official website;
- 4.3.2. collecting information needed to identify any possible corrupt practices, including information on conflicts of interest, reports on gifts and hospitality;
- 4.3.3. giving opinions on the due diligence procedures of the Exchange's Counterparties;
- 4.3.4. performing audits by the Internal Audit Service;
- 4.3.5. carrying out inspection by external auditors of the Exchange.

4. 4. Internal investigation

4. 4. 1. The Exchange investigates all the cases where a suspicion of corrupt practices exists. Measures taken in the course of investigation are proportionate to the extent of potential corrupt practices and damage to the Exchange, subject to unconditional respect for the zero tolerance principle.

4. 4. 2. The purpose of internal investigations is fair fact-finding related to occurring acts of corruption.

4. 4. 3. Internal investigations are carried out in accordance with procedures described in the Rules for reporting violations and abuse in the Moscow Exchange.

4. 5. Response Measures.

4.5.1. The Exchange responds to any and all corrupt practice events confirmed.

4.5.2. Any of Response Measures are allowed only if there is a decision of an authorised body specified in the Exchange's internal documents, following the results of internal inspections and investigations in accordance with the Anti-Corruption Legislation, Anti-Corruption Policy and other Exchange's internal documents.

4.5.3. The decision on the specific scope and content of the Response Measures is based on comprehensive assessment of the circumstances relation to the action committed, including the explanations of Employee(s).

4.5.4. Response Measures may include actions taken to bring an Employee to disciplinary, civil, criminal and administrative liability in accordance with the Russian Federation legislation.

4.5.5. The Exchange analyses outcomes of each case of corrupt practices, as to whether it is necessary to improve the internal control system in order to prevent similar corruption in the future.

4.5.6. Based on the outcomes of each case of corruption practices in accordance with the Exchange's internal procedures, the Exchange determines the actions it must take in accordance with the Anti-Corruption Legislation, including the disclosure of corruption practices to public authorities.

4.5.7. Decisions to disclose corruption practices, approaches to Anti-Corruption, including responses both within the Exchange and towards the third parties, are taken by the corporate body authorised by the Exchange to do so according to internal documents of the Exchange.

5. Powers and responsibilities relating to the Fight against Corruption

5.1 Employees of the Exchange must take part in the implementation of anti-corruption measures in accordance with the Anti-Corruption Policy and their job description, in particular, to take trainings on the Fight against Corruption and conflict of interest management trainings in a regular and timely manner, as well as to inform the Exchange on detected corruption offences committed by other employees, Counter parties or other persons, in the exercise of their professional duties.

5. 2. The Internal Control and Compliance Department is responsible for the prevention of corruption offences. The functions of the Internal Control and Compliance Department relating to corruption prevention include the following:

- developing drafts of the Exchange's internal documents aimed at implementing measures to fight corruption and submitting them for approval to the Exchange's corporate bodies (in accordance with their competence);
- performing an anti-corruption expertise regarding the Exchange's internal documents and contracts
- receiving and considering reports on the signs of corruption detected in the relationship with the Counterparties, on the cases where Employees are induced to commit corruption offences on behalf of or in the interests of the Counterparty, and on the cases where Employees, Counterparties or other persons have committed corruption offences;
- initiating and participating in official anti-corruption inspections and investigations;
- regularly monitoring the implementation of anti-corruption measures and preparing relevant reports and proposals for the management of the Exchange;
- organising corruption risk monitoring and assessment;
- preparing anti-corruption training materials.
- considering the need for and initiating the Exchange's participation in collective agreements on the Fight against Corruption;
- answering questions from employees on the use of the Anti-Corruption Policy.

5. 3. The Internal Control and Compliance Department, Procurement Office, Department of Communications, Legal Department, Security Department and other structural units of the Exchange participate in the implementation of anti-corruption measures in accordance with the Anti-Corruption Legislation, Anti-Corruption Policy and other internal documents of the Exchange.

5. 4. The structural units of the Exchange support the Internal Control and Compliance Department as part of ongoing business audits and investigations related to anti-corruption, as well as part of development and improvement of anti-corruption measures, this including ensuring access to necessary information.

6. Responsibility

6. 1. Regardless of their position, all employees of the Exchange shall be personally responsible for complying with the principles and requirements herein.

6. 2. Employees found guilty of violating the requirements of this Anti-Corruption Policy through an internal investigation may face disciplinary liability, up to and including termination of employment;

7. Policy revision and final provisions

7. 1. This Policy may be amended from time to time in the event of any changes in the Russian Federation legislation or applicable international laws, as well as to incorporate new trends in the Russian and global corporate behaviour practices. Should any of provisions of the Anti-Corruption Policy come in conflict with the current legislation of the Russian Federation, the provisions of the current legislation of the Russian Federation shall apply. Should any of provisions of this Anti-Corruption Policy come in conflict with the traditions, practices or someone's understanding of the relevant rules of conduct, the provisions of this Policy shall apply.

7. 2. By disclosing this Anti-Corruption Policy or individual provisions hereof on its official website, the Exchange openly declares its zero tolerance for corruption, welcomes and encourages all Counterparties, Employees of the Exchange, and other third parties to adhere to the principles

and provisions described herein, and contributes to raising the level of anti-corruption culture in the society and among the Exchange Employees through promoting awareness and training.

7. 3. All employees of the Bank must be familiarised with this Anti-Corruption Policy against their signature in accordance with Exchanges procedures.

**Annex 1
to Anti-Corruption Policy
of the Moscow Exchange**

Legal framework

1. United Nations Convention against Corruption (UNCAC) adopted by UN General Assembly, by resolution 58/4, New York, 31/10/2003;

2. OECD Convention on Combating Bribery of Foreign Public Officials in International Business

Transactions (adopted on 21 November 1997, Istanbul);

3. Criminal Law Convention on Corruption (dated 27 January 1999, ETS No.173., Strasbourg)

4. Criminal Code of the Russian Federation No. 63-FZ, dated 13/06/1996;

5. Russian Federation Code of Administrative Offence dated 30 December 2001 No. 195-FZ

6. Labour Code of the Russian Federation No. 197-FZ, dated 30/12/2001;

7. Federal Law No. 273-FZ dated 25/12/2008 ‘On Countering Corruption’;

8. Federal Law No. 115-FZ ‘On Countering the Legalisation (Laundering) of Criminally Obtained Incomes and the Financing of Terrorism’, dated 07/08/2001.

9. Presidential Decree of the Russian Federation of May 19, 2008 No. 815 ‘On measures for anti-corruption’

10. The National Plan to Counter Corruption for 2018-2020 (approved by the Presidential Decree of the Russian Federation on 29/06/2018, No. 378)

10. UK Bribery Act 2010;

11. Foreign Corrupt Practices Act 1977.