The assurance was carried out in accordance with ISAE 3000 (revised):

For detailed information on material topics, see the section “MOEX Group’s Environment,” “Genuine partnership and engagement with the community,” “2021 Sustainability Performance Highlights” and “Sustainability Approaches and Procedures” of the sections: “2021 Sustainability Performance Highlights”, “Sustainability Data”, and “Sustainability Approaches and Procedures”. The appendices include, “Moscow Exchange’s Contribution to the UN SDGs”, “Statements”, “GRI Content Index”, “SASB Metrics”, “Independent Auditor’s Report”, “Glossary”, and “Contact Details”.

Structure of the Report

For the convenience of the Report’s users, the Group has decided to use a similar structure to that of its 2020 Sustainability Report; accordingly, there are three main sections: “2021 Sustainability Performance Highlights”, “Sustainability Data”, and “Sustainability Approaches and Procedures”. The appendices include, “Moscow Exchange’s Contribution to the UN SDGs”, “Statements”, “GRI Content Index”, “SASB Metrics”, “Independent Auditor’s Report”, “Glossary”, and “Contact Details”.

Moscow Exchange’s Contribution to the UN SDGs

The appendix contains the Group’s priority UN SDGs; it also describes the key tasks, projects, metrics, and results of the Group in achieving these goals as part of its agenda.

Statements

Moscow Exchange Group supports a number of international initiatives and organizations; it shares their principles, integrating their requirements and recommendations into its activities. The “Statements” appendix outlines the Group’s position on a number of vital issues, including:

- statement of Moscow Exchange Group on communication with stakeholders as part of the Sustainable Stock Exchanges initiative;
- statement of Moscow Exchange on compliance with the Principles of the UN Global Compact;
- statement of Moscow Exchange on respect for human rights and counteracting modern slavery.

GRI Content Index

This index consolidates all the GRI disclosures published in the Report, allowing for easier navigation through its sections. It also contains remarks on the disclosures.

SASB Metrics

This index includes metrics pertinent to the SASB Security & Commodity Exchanges standard.
Guidelines and standards used in preparing the Report

This Report has been prepared in accordance with the GRI Standards: Core option; however, the requirements and recommendations of other standards and guidelines were taken into account as well. These include the WFE ESG Guidance & Metrics (2018), the SASB Security & Commodity Exchanges standard (2018), and the Task Force on Climate-related Financial Disclosures (2017).

When preparing the 2021 Report, the Group made the following changes:
- greenhouse gas emission indicators (Scopes 2 and 3) were recalculated, as the Group has revised its approach to estimating indirect greenhouse gas emissions;
- the disclosure of quantitative HR data was brought into line with the GRI Standards; the Group now breaks down information by age group: younger than 30 years old, 30–50, and over 50;
- the approach to calculating the average hours of training per year per employee was brought into line with the GRI Standards; the indicator was recalculated based on the total number of employees at the end of the year, and not on the number of employees who received training;
- the approach to calculating the percentage of new employee hires and turnover by age group and gender was changed: the indicator was recalculated based on the number of the corresponding category at year-end, and not on the total number of employees;
- the amount allocated for charity projects in 2020 was reconsidered;
- the approach to calculating energy intensity was revised (as of 2021, the sum of total energy consumed is factored in, not only electricity);
- the approach to calculating and disclosing indicators related to the right of employees to parental leave, as well as to the wages of starting-grade employees, was brought into line with the GRI standards.

Reporting boundaries

The reporting boundaries include the following entities of Moscow Exchange Group: Moscow Exchange, the National Settlement Depository (NSD), and the National Clearing Centre (NCC). A full list of the Group’s entities and changes to the composition of the Group can be found on page 5 of the 2021 Annual Report, p. 4 and in the 2021 IFRS Consolidated Financial Statements, p. 16.

In this Report, “Moscow Exchange” and “MOEX” mean the organization whose full corporate name as stated in its Articles of Association is Public Joint-Stock Company Moscow Exchange MICEX-RTS, “Moscow Exchange Group”, or simply the “Group”, means the pool of companies that are part of Moscow Exchange Group, which fall within the scope of this Report.

Information about shareholders who own five or more percent of MOEX capital is included in the subsection “Advanced governance and responsible business practices” of the section “2021 Sustainability Performance Highlights” of the current report.

The boundaries of the indicators are indicated in the section “Sustainability Data”. Any information that pertains to different configurations of subsidiaries is accompanied by appropriate disclaimers.

The reporting information is disclosed within two reporting perimeters:
- the first perimeter comprises information pertinent to Moscow Exchange, NSD, and NCC;
- the second perimeter comprises information pertinent to Moscow Exchange.

MOEX GROUP’S APPROACH TO MATERIALITY

Determining material topics for the Report is an essential part of preparing non-financial statements as per the GRI Standards. The purpose of this procedure is to study and identify the economic, environmental, and social issues that are most impacted by Moscow Exchange’s activities and are most important to stakeholders.

According to established practice, material topics are analyzed annually, and stakeholders are surveyed once every two years. The material topics identified through the stakeholder survey carried out by Moscow Exchange in 2020 apply to this Report as well.

In 2020, Moscow Exchange made a comprehensive assessment of material topics, taking into consideration the opinions of key stakeholders. As a result of this assessment, 16 topics were identified; their significance was then evaluated according to the following criteria:
- the significance of Moscow Exchange’s impact on economic, environmental and social aspects of the topic in question (the X axis of the matrix of material topics);
- the significance of the topic for stakeholders, based on an evaluation of Moscow Exchange’s impact on stakeholders’ activities (the Y axis of the matrix of material topics);
- the availability of recommendations on disclosing such topics from leading associations, such as the World Federation of Exchanges (WFE) and the Sustainable Stock Exchanges (SSE) Initiative, which represent the interests of the professional community of stock exchanges.

Based on this analysis, the Group prepared a list of eight topics that it deemed material and mandatory for disclosure. Information on other topics has also been disclosed selectively.
### Material topics

<table>
<thead>
<tr>
<th>GRI</th>
<th>SASB</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Improving the quality of ESG information disclosed by issuing companies and raising awareness of sustainable development trends</td>
<td>GRI 103: Management Approach (2016)</td>
</tr>
<tr>
<td>2. Transparent functioning of markets and development of fair competition</td>
<td>GRI 103: Management Approach (2016)</td>
</tr>
<tr>
<td>GRI 206: Anti-competitive Behavior (2016)</td>
<td>FN-EX-410a.4, FN-EX-510a.1</td>
</tr>
<tr>
<td>3. Enhancing the financial literacy of the public</td>
<td>GRI 103: Management Approach (2016)</td>
</tr>
<tr>
<td>6. Participation in working groups and regulatory initiatives</td>
<td>GRI 102: General Disclosures (2016)</td>
</tr>
<tr>
<td>GRI 103: Management Approach (2016)</td>
<td>–</td>
</tr>
<tr>
<td>GRI 415: Public Policy (2016)</td>
<td>–</td>
</tr>
<tr>
<td>7. Decent working conditions and development of employee skills</td>
<td>GRI 103: Management Approach (2016)</td>
</tr>
<tr>
<td>GRI 401: Employment (2016)</td>
<td>–</td>
</tr>
<tr>
<td>GRI 402: Labor/Management Relations (2016)</td>
<td>–</td>
</tr>
<tr>
<td>GRI 404: Training and Education (2016)</td>
<td>–</td>
</tr>
<tr>
<td>GRI 405: Diversity and Equal Opportunity (2016)</td>
<td>–</td>
</tr>
<tr>
<td>GRI 103: Management Approach (2016)</td>
<td>FN-EX-550a.1</td>
</tr>
</tbody>
</table>

1 In accordance with clause 2.5.3 of the section ‘Disclosure of material topics’ of the GRI Standards, due to the absence of thematic indicators for a number of material topics, the approach to management and other applicable details will be disclosed in respect of the following material topics: “Improving the quality of ESG information disclosed by issuing companies and raising awareness of sustainable development trends,” “Enhancing the financial literacy of the public,” “Development of new financial instruments for responsible investing,” and “Development of exchange infrastructure to expand the local investor base.”

### Other non-material topics that can be disclosed selectively

<table>
<thead>
<tr>
<th>GRI</th>
<th>SASB</th>
</tr>
</thead>
<tbody>
<tr>
<td>GRI 419: Socioeconomic Compliance (2016)</td>
<td></td>
</tr>
<tr>
<td>GRI 415: Public Policy (2016)</td>
<td></td>
</tr>
<tr>
<td>FN-EX-510a.1</td>
<td></td>
</tr>
<tr>
<td>FN-EX-510a.2</td>
<td></td>
</tr>
<tr>
<td>GRI 401: Employment (2016)</td>
<td></td>
</tr>
<tr>
<td>GRI 405: Diversity and Equal Opportunity (2016)</td>
<td></td>
</tr>
<tr>
<td>GRI 406: Non-discrimination (2016)</td>
<td></td>
</tr>
<tr>
<td>GRI 408: Child Labor (2016)</td>
<td></td>
</tr>
<tr>
<td>GRI 409: Forced or Compulsory Labor (2016)</td>
<td></td>
</tr>
<tr>
<td>12. Access to funding for innovative companies</td>
<td>–</td>
</tr>
<tr>
<td>13. Opportunities for growth and access to funding for small and medium-sized enterprises</td>
<td>–</td>
</tr>
<tr>
<td>GRI 408: Child Labor (2016)</td>
<td></td>
</tr>
<tr>
<td>GRI 409: Forced or Compulsory Labor (2016)</td>
<td></td>
</tr>
<tr>
<td>GRI 303: Water and Effluents (2018)</td>
<td></td>
</tr>
<tr>
<td>GRI 305: Emissions (2016)</td>
<td></td>
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<tr>
<td>GRI 306: Waste (2020)</td>
<td></td>
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<tr>
<td>GRI 307: Environmental Compliance (2016)</td>
<td></td>
</tr>
<tr>
<td>GRI 203: Indirect Economic Impacts (2016)</td>
<td></td>
</tr>
<tr>
<td>GRI 413: Local Communities (2016)</td>
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</tr>
</tbody>
</table>
We are issuing our third sustainability report in challenging times, marked by great uncertainty and change in the economy and financial markets. However, we believe it is important to continue our dialogue with investors, issuing companies, regulators, and the general public.

To reaffirm our commitment to sustainability, we would like to acquaint you with some of our accomplishments in this area.

Despite the ongoing hardships caused by the COVID-19 pandemic, in 2021 the global and Russian economies recovered, and capital markets activity bounced back as well. We are issuing our third sustainability report in a concise, comprehensible manner. Over 100,000 people underwent training at the Moscow Exchange School, whose experts created more than 100 training courses. We feel a responsibility for people’s future, so we consider financial education to be one of the most socially significant aspects of our sustainability agenda.

Moscow Exchange’s IT systems remained highly available to all participants, with a record-setting 100% uptime in 2021. We also extended trading hours, enhancing the availability and quality of all our services.

As millions of private investors join the market, issuers must pay closer attention to the social and environmental footprint of their activities. In many ways, this trend is shaped by Moscow Exchange. We do our best to adapt international best practices and pass on knowledge to Russian market participants and issuers. In pursuit of these goals, in 2021 our Guide for Issuers: How to Comply with Best Practices in Sustainability was released. It is bound to help Russian issuers align themselves with the ESG agenda.

We create conditions that encourage investors to adhere to responsible investment strategies. In 2021, we stepped up efforts to develop the targeted securities segment (green and social bonds in the Sustainability Sector), giving investors the opportunity to direct their capital to solving real environmental and social problems. As a result, by the end of 2021 over RUB 190 billion in securities were being traded in the segment, which is almost eight times more than in 2020.

For “new economy” companies, including many SMEs and innovative start-ups, getting support to establish themselves is crucial. In this regard, we continued to implement projects in the Growth sector and the Innovation and Investment Sector.

In the Growth sector, the number of SMEs increased by 1,783 in 2021. Over RUB 67 billion worth of capital was raised in the Growth Sector, and securities worth RUB 7.9 billion were placed. This attests that the indicators set out in the national project Small and Medium-Sized Entrepreneurship and Support for Individual Entrepreneurial Initiatives have been achieved. The volume of securities traded in the Innovation Sector totaled over RUB 300 billion.

In 2021, the Supervisory Board decided that Moscow Exchange should take part in shaping the Russian carbon trading market. The global climate-regulation process remains relevant for Russia, and we intend to be active participants. To this end, we are developing a system for monitoring greenhouse gas emissions by the Group’s companies. In 2021, we prepared maps of climate risks and opportunities, which will be used to develop new climate-related projects.

Our report describes our approach to managing our social and environmental footprint and to developing corporate governance. In 2020, we integrated ESG goals and initiatives into the Group’s 2024 Strategy. In 2021, we took the next step and came up with a Roadmap for meeting these goals.

One of the key projects on this Roadmap is switching all offices and data centers to green contracts; in 2021, the main offices of Moscow Exchange, the National Clearing Center, and the National Settlement Depository in Moscow already started procuring energy generated at Ulyanovsk Wind Farm 2. In the coming years, Moscow Exchange plans to convert all of its facilities with the highest energy consumption to renewable sources.

In the reporting year, we worked to strengthen the risk management, internal audit, and compliance control systems of the Group’s companies. Particular attention was paid to establishing competency centers and transitioning to a flexible office working system. We also developed the Tax Strategy of Moscow Exchange Group.

Adherence to the principles of sustainability helps our companies implement the Group’s strategy, allowing us to fulfill our role in the Russian economy by ensuring the transparency and stability of financial markets. While we may need to somewhat adjust our initial plans to implement our core ESG initiatives, we intend to keep pursuing them.

I would like to thank our staff, business partners, and all stakeholders for their participation, efforts, and support in 2021. Together, we strengthen the business of Moscow Exchange Group and continue to create long-term value for a wide range of stakeholders.

Chief Executive Officer
Public Joint-Stock Company Moscow Exchange MICEX-RTS
Yury Denisov
INTEGRATING ESG PRINCIPLES INTO THE 2024 GROUP STRATEGY

MISSION AND PRIORITIES OF THE 2024 STRATEGY

In 2021, Moscow Exchange Group continued to implement its 2024 Group Strategy, which was approved by the Supervisory Board in 2019. The Strategy identifies two areas of responsibility for the Group and three areas of development, which correspond to the Group’s mission and vision.

Priorities of the 2024 Group Strategy

1. Mission
   - The Group’s mission is to bring trust, efficiency, and innovation to financial markets, as well as to help companies and the public achieve sustainable prosperity.

2. Areas of responsibility
   - Core Market Penetration
     - Moscow Exchange will expand trading hours, make its services more available, and develop its range of products and services, allowing it to operate at the same level as major international exchanges. It also plans to develop initiatives and tools in the Sustainability and Growth sectors.
   - Culture of Trust and Responsibility
     - The Group will continue to promote a culture of compliance with regulatory requirements, standards, and principles of business conduct. Moscow Exchange will ensure the reliable functioning and cybersecurity of its key information systems’ infrastructure.

3. Areas of development
   - Financial Platform
     - Moscow Exchange plans to expand its accounting infrastructure with respect to financial assets; it also intends to broaden its range of services to include more savings instruments and information assets.
   - Balance Sheet Management
     - Moscow Exchange plans to create a single interface that provides flexible services for finding liquidity, executing orders, and posting trading. It also plans to develop a platform with convenient tools for investing funds profitably and managing investments.
   - Market Gateway
     - Moscow Exchange intends to develop services that provide market participants with new opportunities to promote their services, also offering private investors an interface for accessing the financial market in a single information field.

Consistently implementing the 2024 Group Strategy will enable Moscow Exchange Group to increase its customer base, promote the development of financial markets, increase the availability of financial services for issuers and investors, stimulate uptake of best practices, and ensure that Moscow Exchange’s business model remains highly efficient and profitable.

In 2021, the 2024 Group Strategy was amended to include new provisions on implementing ESG projects, safeguarding cybersecurity infrastructure, and expanding international activities. These changes did not affect the Group’s development priorities. The Group plans to deepen markets by introducing initiatives in the Sustainability and Growth sectors.

The Group realizes that its strategic plans will be impacted by the complex geopolitical situation unfolding in H1 2022; however, it intends to continue implementing the key projects of its Sustainability Roadmap.

Detailed information on the progress that the Group has made in implementing its 2024 Development Strategy is published in the 2021 Annual Report.

THE ROLE OF THE SUSTAINABLE DEVELOPMENT AGENDA IN THE 2024 GROUP STRATEGY

Since 2020, Moscow Exchange Group has been actively integrating ESG and sustainable development principles into strategic planning, corporate governance, risk management, personnel management, and other areas of its activities.

- ESG competence building: trainings for the involvement of departments, the Management Board, the Supervisory Board
- Development of new ESG products and services
- Further expansion of the ESG product and service portfolio
- Integration of ESG principles into strategy 2025+
- Development of listing rules to include relevant in the market ESG requirements
- Updating of policies and management systems in the emergence of the new requirements and best practices
OVERVIEW OF MOSCOW EXCHANGE GROUP’S REPORTING SUITE
2021 SUSTAINABILITY PERFORMANCE HIGHLIGHTS
SUSTAINABILITY DATA
SUSTAINABILITY APPROACHES AND PROCEDURES
APPENDICES

MOEX.COM | SUSTAINABILITY REPORT 2021

MOYCHOW EXCHANGE'S SUSTAINABILITY ROADMAP

In 2021, the Group developed a Sustainability Roadmap (the “Roadmap”). This document presents the main activities of the Group’s companies in the field of sustainable development, describes key projects and indicators for quantifying their performance, and clarifies which business units are responsible for implementing certain projects.

The Roadmap includes a phased action plan for the medium term. Development areas have also been identified. All planned activities and projects were completed by the end of 2021. Information is presented in the subsection “Key indicators”.

Major ESG projects included in the 2024 Group Strategy¹

| G | Improving financial literacy of the public and novice investors
   | Providing private investors with better access to financial services, including through the Financial Services personal finance platform
   | Implementing long-term community engagement projects

| R | Expanding the range of stock exchange products and services that address environmental and social problems
   | Improving access to financing for small and medium-sized enterprises (SMEs)
   | Informing issuers and other financial market participants about trends in reporting and significant ESG issues and risks

| E | Training and developing diverse employee competencies
   | Building a healthy corporate culture based on the principles of diversity and equal opportunity

| A | Strengthening a culture of compliance with legal and corporate ethics in the Group’s companies; promoting this topic among clients
   | Implementing and promoting international standards of corporate governance based on the ESG principles

| T | Ensuring business continuity and risk resilience at the Group’s companies

¹ Given the difficult geopolitical situation, plans for implementing some projects may need to be adjusted, although the Group’s companies intend to proceed with key initiatives in each of the ESG strategy areas.

KEY NON-FINANCIAL PERFORMANCE INDICATORS

Each year, Moscow Exchange sets values for key performance indicators (KPIs), which are approved by the Supervisory Board. The KPIs for 2021 included:

- developing new products and services.

As of year-end, all established KPIs have been achieved.

- The Group’s clients were offered new products and services that ease access to financial markets, including in the retail segment.
- Trading hours on the FX, Derivative, and Equity Markets were extended; new OTC services were offered on the FX Market; new instruments were launched on the Equity and Derivatives Markets; and 27 new partner financial organizations were involved in a project to provide private financial services. The Group’s project to expand carbon accounting and trading infrastructure will broaden the range of offers available to market participants.

Specific, quantifiable goals are set for the members of the Executive Board, as well as for all other employees of Moscow Exchange. Achievement of these goals impacts the compensation received by employees and management.

MEDIUM-TERM ACTION PLAN

Based on the Roadmap, Moscow Exchange has made the following plans² in the field of sustainable development and ESG initiatives:

- continue to integrate ESG objectives into business processes;
- develop the competencies of employees and managers in ESG and sustainable development;
- develop new ESG products and services;
- continue to integrate climate risks into the risk management system;
- continue to improve the quality of non-financial disclosures.

² Given the complex geopolitical situation, implementation of the plans will largely depend on the capabilities of the Group companies, as well as on the demand for the listed products and services on the part of customers and market participants. At the same time, the Group intends to make every effort to implement the steps and plans outlined in the Roadmap.
OVERVIEW OF MOSCOW EXCHANGE GROUP’S REPORTING SUITE
SUSTAINABILITY PERFORMANCE HIGHLIGHTS
SUSTAINABILITY DATA
SUSTAINABILITY APPROACHES AND PROCEDURES
APPENDICES

KEY INDICATORS

Moscow Exchange Group is the largest exchange in Russia, as well as Central and Eastern Europe, in terms of the trade volume1 of its main asset classes; it also has the largest stock market capitalization. It plays a key role in the development of the Russian financial sector.

Moscow Exchange Group compared with other exchanges worldwide:

11th by trading volume on the Derivatives Market
15th by market capitalization
26th by trading volume on the Equity Market

SCOPE OF ACTIVITIES

Moscow Exchange Group provides a full range of trading and post-trading services in five markets (Equity, Bond, FX, Money, Commodity, and Derivatives) to individuals and legal entities. Securities of companies from all sectors of the economy are represented on Moscow Exchange.

The Group operates in Russia, and it has a single customer service center located in Moscow. Moscow Exchange also owns a 13.1% stake in the Kazakhstan Stock Exchange (KASE).

Moscow Exchange Group includes Public Joint-Stock Company Moscow Exchange MICEX-RTS, which operates the only multifunctional exchange platform in Russia for trading in equities, money market instruments, derivatives, foreign currencies, precious metals, and other assets. Moscow Exchange PJSC provides trading opportunities for equities, bonds, derivatives, currencies, money market instruments, and commodities2. In 2021, about 6,000 local and 1,000 global instruments, including ESG instruments, were traded on Moscow Exchange.

At the end of 2021, Moscow Exchange achieved record operating and financial results. This can be attributed to several factors: an influx of private investors, a more active primary market, extended trading hours, and the launch of new products and services.

In 2021, there were six initial public offerings (IPOs), including three placements that were exclusive to Moscow Exchange. A secondary public offering (SPO) was carried out by 11 companies, the total value of which was more than RUB 500 billion.

In 2021, international investors and Russian retail investors were most active on the Equity and Derivatives Markets, while Russian banks and brokerage organizations were most active on other markets.

CUSTODIANS AND CUSTOMERS

In 2021, international investors and Russian retail investors were most active on the Equity and Derivatives Markets, while Russian banks and brokerage organizations were most active on other markets.

In the reporting year, private investors’ activity reached a historic high: more than two million people executed transactions each month (+136% on 2020)3. The share of private investors (Russian retail investors) in equity trading reached 40%; in bonds trading the corresponding figure was 10%, in the FX Market — 5%, and in the Derivatives Market — 43%.

1 Hereafter the “Group” means Moscow Exchange Group, whereas “Moscow Exchange PJSC”, “Moscow Exchange”, and “Exchange” mean Public Joint-Stock Company Moscow Exchange MICEX-RTS.
2 The Group also comprises the following non-banking organizations: a central depository (NCO National Settlement Depository JSC, or “NSD”), a clearing center (National Clearing Center JSC, or “NCC”), which performs the functions of a central counterparty on the markets, and other entities. Moscow Exchange PJSC owns 100% of the shares in NSD and 99.997% of the shares in NCC. In 2021, Moscow Exchange PJSC acquired INGURU, a leading platform for selecting insurance and banking products (the asset consists of two separate legal entities: Insveb and Disovers). Moscow Exchange also increased its share in OTC FX, the trading platform of Bierbaumpro AG. The key asset of Bierbaumpro AG is NTPro. A list of other Group entities is provided in the 2021 Annual Report (p. 5) and in the financial statements (Note 4).
3 For more information on the business model, see the 2021 Annual Report (pp. 6-7).
OVERVIEW OF MOSCOW EXCHANGE GROUP’S REPORTING SUITE
2021 SUSTAINABILITY PERFORMANCE HIGHLIGHTS
SUSTAINABILITY DATA
SUSTAINABILITY APPROACHES AND PROCEDURES
APPENDICES

Structure of trading volume by market and customer type in 2021, %

<table>
<thead>
<tr>
<th>Market</th>
<th>Russian management companies</th>
<th>Russian retail investors</th>
<th>International investors</th>
<th>Russian banks, brokerage organizations</th>
<th>Russian companies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equity Market</td>
<td>40</td>
<td>48</td>
<td>48</td>
<td>48</td>
<td>48</td>
</tr>
<tr>
<td>Derivatives Market</td>
<td>43</td>
<td>59</td>
<td>59</td>
<td>59</td>
<td>59</td>
</tr>
<tr>
<td>Bond Market</td>
<td>16</td>
<td>13</td>
<td>13</td>
<td>13</td>
<td>13</td>
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<tr>
<td>FX Market</td>
<td>16</td>
<td>18</td>
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<tr>
<td>Money Market</td>
<td>9</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
</tr>
</tbody>
</table>

During the reporting period, the public’s attention to financial market instruments continued to grow. The number of individuals with brokerage accounts at Moscow Exchange increased by 8 million in 2021, reaching a record 16.8 million people. The number of unique clients in the trading system exceeded 16 million people (about 10% of the population of Russia), of which more than one million are active clients. The number of individual investment accounts increased by 1.5 million, amounting to about 4.9 million accounts.

16.8 million individuals have brokerage accounts

Growth trends in the number of individuals with Moscow Exchange accounts, by region

Number of unique clients on the stock market as of the end of December each year, people

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of Clients</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019</td>
<td>3,809,911</td>
</tr>
<tr>
<td>2020</td>
<td>8,787,077</td>
</tr>
<tr>
<td>2021</td>
<td>16,779,069</td>
</tr>
</tbody>
</table>

Number of registered individuals who used two or more Moscow Exchange markets as of the end of December each year, people

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of Clients</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019</td>
<td>369,599</td>
</tr>
<tr>
<td>2020</td>
<td>1,360,402</td>
</tr>
<tr>
<td>2021</td>
<td>2,806,373</td>
</tr>
</tbody>
</table>

TRADING VOLUME AND NUMBER OF TRANSACTIONS

The average daily trading volume (ADTV) on all markets in 2021 increased by 4.5% compared to 2020, amounting to RUB 3.9 trillion. The highest growth was in the Derivatives Market (+19.3%) and the Equity Market (+23%).

ADTV by market, including placements, RUB billion

<table>
<thead>
<tr>
<th>Market</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Money Market</td>
<td>3,167.7</td>
<td>3,170.3</td>
<td>+0.8%</td>
</tr>
<tr>
<td>FX Market</td>
<td>724.4</td>
<td>748.2</td>
<td>+3.3%</td>
</tr>
<tr>
<td>Derivatives Market</td>
<td>138.1</td>
<td>154.1</td>
<td>+11.7%</td>
</tr>
<tr>
<td>Bond Market</td>
<td>117.6</td>
<td>140.6</td>
<td>+18.3%</td>
</tr>
<tr>
<td>Equity Market</td>
<td>154.9</td>
<td>165.0</td>
<td>+6.4%</td>
</tr>
</tbody>
</table>

In 2021, the total trading volume on Moscow Exchange’s markets reached a historic high, surpassing the RUB 1 quadrillion mark for the first time (+4.6% compared to 2020).

Daily average number of transactions, by market

<table>
<thead>
<tr>
<th>Market</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Money Market</td>
<td>3,054,377</td>
<td>3,094,377</td>
</tr>
<tr>
<td>FX Market</td>
<td>1,214,492</td>
<td>1,258,013</td>
</tr>
<tr>
<td>Derivatives Market</td>
<td>278,318</td>
<td>306,390</td>
</tr>
<tr>
<td>Bond Market</td>
<td>141,611</td>
<td>152,932</td>
</tr>
<tr>
<td>Equity Market</td>
<td>156,329</td>
<td>166,515</td>
</tr>
</tbody>
</table>

Growth trends in the number of individuals with Moscow Exchange accounts, by region

<table>
<thead>
<tr>
<th>Region</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central Federal District</td>
<td>334,513</td>
<td>333,016</td>
</tr>
<tr>
<td>Northwestern Federal District</td>
<td>298,421</td>
<td>300,016</td>
</tr>
<tr>
<td>Far Eastern Federal District</td>
<td>131,322</td>
<td>134,016</td>
</tr>
<tr>
<td>North Caucasian Federal District</td>
<td>12,604</td>
<td>13,016</td>
</tr>
<tr>
<td>Siberian Federal District</td>
<td>27,604</td>
<td>27,016</td>
</tr>
<tr>
<td>Ural Federal District</td>
<td>16,604</td>
<td>17,016</td>
</tr>
<tr>
<td>Siberian Federal District</td>
<td>15,004</td>
<td>16,016</td>
</tr>
<tr>
<td>Southern Federal District</td>
<td>10,004</td>
<td>11,016</td>
</tr>
<tr>
<td>Volga Federal District</td>
<td>8,004</td>
<td>9,016</td>
</tr>
<tr>
<td>Ural Federal District</td>
<td>6,004</td>
<td>6,016</td>
</tr>
<tr>
<td>Western Siberian Federal District</td>
<td>4,004</td>
<td>4,016</td>
</tr>
<tr>
<td>Eastern Siberian Federal District</td>
<td>3,004</td>
<td>3,016</td>
</tr>
<tr>
<td>Central Siberian Federal District</td>
<td>2,004</td>
<td>2,016</td>
</tr>
<tr>
<td>North Caucasian Federal District</td>
<td>1,004</td>
<td>1,016</td>
</tr>
<tr>
<td>Far Eastern Federal District</td>
<td>503</td>
<td>516</td>
</tr>
<tr>
<td>Ural Federal District</td>
<td>253</td>
<td>261</td>
</tr>
<tr>
<td>Siberian Federal District</td>
<td>753</td>
<td>771</td>
</tr>
<tr>
<td>Volga Federal District</td>
<td>553</td>
<td>571</td>
</tr>
<tr>
<td>Western Siberian Federal District</td>
<td>453</td>
<td>471</td>
</tr>
<tr>
<td>Eastern Siberian Federal District</td>
<td>353</td>
<td>371</td>
</tr>
<tr>
<td>Central Siberian Federal District</td>
<td>253</td>
<td>271</td>
</tr>
<tr>
<td>North Caucasian Federal District</td>
<td>153</td>
<td>171</td>
</tr>
<tr>
<td>Far Eastern Federal District</td>
<td>73</td>
<td>81</td>
</tr>
<tr>
<td>Ural Federal District</td>
<td>43</td>
<td>49</td>
</tr>
<tr>
<td>Siberian Federal District</td>
<td>24</td>
<td>26</td>
</tr>
<tr>
<td>Volga Federal District</td>
<td>14</td>
<td>16</td>
</tr>
<tr>
<td>Western Siberian Federal District</td>
<td>9</td>
<td>11</td>
</tr>
<tr>
<td>Eastern Siberian Federal District</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Central Siberian Federal District</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>North Caucasian Federal District</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Far Eastern Federal District</td>
<td>1</td>
<td>2</td>
</tr>
</tbody>
</table>

Growth trends in the number of individuals with Moscow Exchange accounts, by region

<table>
<thead>
<tr>
<th>Region</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central Federal District</td>
<td>1,475,065</td>
<td>1,482,041</td>
</tr>
<tr>
<td>Northwestern Federal District</td>
<td>1,234,077</td>
<td>1,248,034</td>
</tr>
<tr>
<td>Far Eastern Federal District</td>
<td>214,174</td>
<td>219,142</td>
</tr>
<tr>
<td>North Caucasian Federal District</td>
<td>145,246</td>
<td>150,070</td>
</tr>
<tr>
<td>Siberian Federal District</td>
<td>165,244</td>
<td>170,070</td>
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<tr>
<td>Ural Federal District</td>
<td>105,242</td>
<td>109,070</td>
</tr>
<tr>
<td>Siberian Federal District</td>
<td>66,240</td>
<td>69,070</td>
</tr>
<tr>
<td>Volga Federal District</td>
<td>46,238</td>
<td>49,070</td>
</tr>
<tr>
<td>Ural Federal District</td>
<td>26,236</td>
<td>29,070</td>
</tr>
<tr>
<td>Siberian Federal District</td>
<td>17,234</td>
<td>19,070</td>
</tr>
<tr>
<td>Volga Federal District</td>
<td>9,232</td>
<td>10,070</td>
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<tr>
<td>Western Siberian Federal District</td>
<td>5,230</td>
<td>5,470</td>
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<tr>
<td>Eastern Siberian Federal District</td>
<td>3,228</td>
<td>3,510</td>
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<tr>
<td>Central Siberian Federal District</td>
<td>2,226</td>
<td>2,510</td>
</tr>
<tr>
<td>North Caucasian Federal District</td>
<td>1,224</td>
<td>1,510</td>
</tr>
<tr>
<td>Far Eastern Federal District</td>
<td>722</td>
<td>810</td>
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<tr>
<td>Ural Federal District</td>
<td>322</td>
<td>351</td>
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<tr>
<td>Siberian Federal District</td>
<td>172</td>
<td>191</td>
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<tr>
<td>Volga Federal District</td>
<td>92</td>
<td>101</td>
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<tr>
<td>Western Siberian Federal District</td>
<td>52</td>
<td>59</td>
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<tr>
<td>Eastern Siberian Federal District</td>
<td>29</td>
<td>33</td>
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<tr>
<td>Central Siberian Federal District</td>
<td>19</td>
<td>22</td>
</tr>
<tr>
<td>North Caucasian Federal District</td>
<td>9</td>
<td>11</td>
</tr>
<tr>
<td>Far Eastern Federal District</td>
<td>5</td>
<td>6</td>
</tr>
</tbody>
</table>
2021 SUSTAINABILITY MILESTONES

January
- Moscow Exchange was included in RAEX-Europe’s ESG ranking
- The Supervisory Board approved the UN SDGs, as well as corresponding targets and metrics.
- Moscow Exchange, together with market participants, developed the Code of Conduct in Financial Markets.

February
- The Supervisory Board approved the Code of Professional Ethics of Moscow Exchange PJSC, which replaced the outdated Code of Business Conduct.

March
- Moscow Exchange launched the first issue of City of Moscow green bonds.

April
- On 27 May 2021, Moscow Exchange launched the first issue of City of Moscow green bonds.

May

June
- The Supervisory Board approved the UN SDGs, as well as corresponding targets and metrics.
- Moscow Exchange was included in RAEX-Europe’s ESG ranking.

July
- Moscow Exchange developed the ESG Best Practices Guide for companies.

August
- The Supervisory Board extended the term of Yury Denisov as Chairman of the Moscow Exchange Executive Board.
- The Supervisory Board approved the UN SDGs, as well as corresponding targets and metrics.
- Moscow Exchange, together with market participants, developed the Code of Conduct in Financial Markets.
- The climate-risk assessment process was initiated in accordance with Task Force on Climate-Related Financial Disclosures (TCFD) requirements.

September
- Moscow Exchange accessed the Anti-Corruption Charter of Russian Business.
- Moscow Exchange developed the ESG Best Practices Guide for companies.

October
- The Supervisory Board extended the term of Yury Denisov as Chairman of the Moscow Exchange Executive Board.
- The climate-risk assessment process was initiated in accordance with Task Force on Climate-Related Financial Disclosures (TCFD) requirements.

November
- Moscow Exchange upgraded the Sustainability sector and adjusted ETF requirements.
- The annual program of engagement with the company Fortum associated with green electricity purchase has been completed.
- Moscow Exchange developed a tax strategy.

December
- A new version of the Listing Rules of Moscow Exchange PJSC was approved.
- It contains updated bond-placement requirements for the simultaneous financing of environmental development and community projects.
- The concept of adaptation bonds was introduced.
- Moscow Exchange developed and approved a Sustainability Roadmap.
- Sustainability and the impact of retail investors on the market were the main topic at the Moscow Exchange International Forum.
CLIMATE AGENDA

For the 2019, 2020, and 2021 metrics, see the subsection “Resource efficiency and environmental impact” of the section “Sustainability Data”.

GOVERNANCE

The Group’s general ESG strategy covers the management of climate risks and opportunities. Identifying and assessing climate risks and opportunities and integrating such processes into the activities of the Group companies are part of Moscow Exchange’s Sustainability Roadmap. In implementing the Roadmap, the Group companies and management bodies get a better understanding of the climate agenda and the tasks faced by the Group.

Moscow Exchange Group works to improve its business processes with due regard for climate risks and introduce new operating models. This approach facilitates the taking of more weighted strategic decisions in planning out the Group’s activities.

The Supervisory Board and the Risk Management Committee consider climate risks and opportunities, analyzing the quality of their management and the effectiveness of the Group companies’ activities. Members of the Supervisory Board participate in climate risk management by preparing instructions for the Group companies and ensuring that the climate agenda is included in the Group’s medium-term and long-term strategy. Members of the Executive Board oversee the Group’s climate risk management plans and actions.

Moscow Exchange strives to mitigate climate change in two ways: through compliance with best global practices in accounting for and reducing greenhouse gas emissions, and their actions are becoming more focused. The participants of COP26 reached certain agreements, including on Article 6 of the Paris Agreement, which defines how international carbon markets should operate. These agreements may lead to changes in national law and affect the business environment and financial flows of financial institutions and companies.

Every year, an increasing number of countries and companies strive to account for and reduce greenhouse gas emissions, and their actions are becoming more focused. The participants of COP26 reached certain agreements, including on Article 6 of the Paris Agreement, which defines how international carbon markets should operate. These agreements may lead to changes in national law and affect the business environment and financial flows of financial institutions and companies.

Climate risks and opportunities management goals:

- build resilience to climate risks;
- take full advantage of climate change;
- contribute to achieving the Paris Agreement objectives.

STRATEGY AND SCENARIO ANALYSIS

In 2020–2021, Moscow Exchange analyzed the Group’s exposure to climate risks, including those related to products and services provided. Moscow Exchange assessed its interactions with customers, partners, and suppliers in this context. To analyze possible options, quantitative and qualitative methods of risk assessment were employed, including scenario analysis. Moscow Exchange also identified new opportunities for the Group’s companies and financial market participants associated with the transition to a lower-carbon global economy.

The scenario analysis revealed:

- low-impact risks that emerged in the previous two years;
- medium- and high-impact risks that emerged over the previous 20 years.

The calculations used scenario terms of the IPCC and the International Energy Agency (RCP 2.6 and IEA 2050), supplemented by Group-specific criteria.

For each climate risk scenario, Moscow Exchange develops measures to mitigate the adverse impact of its activities on the climate and increase the Group’s ability to adapt to climate change, changes in the regulatory environment, and cater to the market’s appetite for responsible investing.

Following the analysis, heat maps of risks and opportunities were prepared.

Moscow Exchange Group’s strategic action plan for climate risk management includes the following key areas:

- enhancing the understanding of climate risks;
- regularly assessing climate risks (including physical and transition risks) and formulating actions to manage these risks in the short, medium, and long term;
- integrating climate risks into Moscow Exchange’s risk map and embedding them into the general risk management processes;
- disclosing information about (a) climate risk identification and assessment processes; (b) the appropriateness of scenarios related to climate change; (c) key climate risks and, where applicable, their impact on financial performance; and (d) measures taken to adapt to climate change;
- collaborating with regulators, industry associations, and international financial institutions to share best practices for managing climate risks.

The Group believes that this approach is in line with its business strategy, as it will foster a more stable and effective financial system and the achievement of greenhouse gas emissions reduction targets.

1 The Task Force operates under the Financial Stability Board and provides recommendations on the voluntary disclosure of risks posed by global climate change.

2 IPCC stands for the Intergovernmental Panel on Climate Change. The IPCC has worked out four scenarios of the future evolution of anthropogenic greenhouse gas emissions, of which RCP 2.6 (the most favorable scenario) assumes that by 2065 the annual average air temperature will have increased by no more than 1.6°C. The IEA 2050 presents a strategy for limiting the global temperature increase to 2°C.

3 As at the date of the report, the risk and opportunity heat maps are under review and pending approval by Moscow Exchange management.
RISK MANAGEMENT

Moscow Exchange Group admits that climate change poses risks to business continuity that may have long-term economic, environmental, and social implications for many sectors of the global economy, society, and the companies of the Group.

As part of its risk management system, the Group regularly identifies and assesses business risks in terms of their likelihood and expected financial losses. Moscow Exchange continuously monitors the legal environment and introduces international best practices to identify and assess climate risks and incorporate climate-related disclosures in its reporting.

Under the business continuity management system, a list of climate risks is compiled and factored in to strategic and financial planning. Moscow Exchange regularly assesses the impact of climate risks on trade and investment portfolios.

The Group admits that climate change poses risks to business continuity that may have long-term economic, environmental, and social implications for many sectors of the global economy, society, and the companies of the Group.

In line with the TCFD’s recommendations, Moscow Exchange distinguishes two main types of climate risks:

- **Physical risks**: risks of extreme weather events, natural and man-made disasters;
- **Transition risks**: risks associated with the transition to a lower-carbon economy.

Physical risks involve potentially significant damage to premises and infrastructure, and harm to employees of the Group, its customers and partners, disrupting their businesses and resulting in financial losses that may prove critical.

Transition risks are divided into policy and legal, technology, market, and reputation risks. Each type may have significant financial implications for the Group’s business.

Moscow Exchange has divided its climate risks into five types: market, policy and legal, reputational, physical, and technology, and estimates their probability and the expected losses (see the table below for a more detailed description).

### Climate risks of Moscow Exchange Group

<table>
<thead>
<tr>
<th>Climate risks</th>
<th>Impact</th>
<th>Probability of small-magnitude risk</th>
<th>Probability of large-magnitude risk</th>
<th>Response to risk or risk mitigation measures</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Physical risks</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acute risks</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flooding, snowfalls</td>
<td>Changes in precipitation and extreme variability in weather patterns, including floods with destruction of roads, bridges, power lines, buildings, and other infrastructure, resulting in loss of life or injuries and leading to business shutdown</td>
<td>Low</td>
<td>Low</td>
<td>Disaster recovery strategies include: ■ reconfiguration of systems using hardware that remains stable, enabling restoration of communications after a critical failure; ■ availability and configuration of hot backups to restore major infrastructure applications; ■ mirroring and cold backup of affected location and data recovery.</td>
</tr>
<tr>
<td>Freezing rain</td>
<td>Power failures (ice-covered power lines become extremely heavy, causing line supports, insulators, and lines to break). Traffic delays due to icy roads. Potential loss of life or injuries</td>
<td>Moderate</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>Hurricanes, storms</td>
<td>Destruction of power lines, residential buildings, and other infrastructure, with loss of life or injuries and leading to business shutdown. Traffic delays</td>
<td>High</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>Forest fires</td>
<td>Destruction of property. Release of hazardous chemicals due to wildfires has a significant adverse impact on human health</td>
<td>High</td>
<td>Low</td>
<td>Employee relocation plan will be rolled out in the event of forest fire emergencies</td>
</tr>
<tr>
<td><strong>Chronic risks</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Extremely hot weather</td>
<td>Adverse impact on employee health and operability of equipment. Lower productivity</td>
<td>Moderate</td>
<td>Low</td>
<td>Providing a comfortable workplace environment: workplaces in air-conditioned offices will be offered to employees working from home without air-conditioning</td>
</tr>
<tr>
<td>Extremely cold weather</td>
<td>Adverse impact on employee health and operability of equipment, resulting in slowdown or shutdown of operations</td>
<td>Low</td>
<td>Low</td>
<td>Providing a comfortable workplace environment: employees working in the office will be permitted to stay at home. Employee relocation plan will be rolled out if extremely cold weather is followed by a central heating shutdown</td>
</tr>
</tbody>
</table>

**Key processes of the climate risk management system:**

- compilation of a list of risks and opportunities, categorized and prioritized;
- assessment of the likelihood and impact of the risks identified;
- scenario analysis of risks and opportunities;
- updating the heat map of risks;
- monitoring the implementation of risk mitigation measures.
<table>
<thead>
<tr>
<th>Climate risks</th>
<th>Impact</th>
<th>Probability of small-magnitude risk</th>
<th>Probability of large-magnitude risk</th>
<th>Response to risk or risk mitigation measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transition risks</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy and legal risks</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>High power costs</td>
<td>Energy prices rising faster than inflation as a result of abrupt transition to zero-carbon power generation</td>
<td>Moderate</td>
<td>Moderate</td>
<td>Wider use of energy-efficient equipment</td>
</tr>
<tr>
<td>Enhanced emissions-reporting obligations</td>
<td>Additional financial and labor costs to collect information and report greenhouse gas emissions and their reduction</td>
<td>Moderate</td>
<td>High</td>
<td>Establishing carbon reporting procedures, participating in national and international carbon reporting initiatives. Engaging consultants for carbon reporting</td>
</tr>
<tr>
<td>Inaccurate emissions disclosures</td>
<td>Fines and reputational damage: this is a developing area with new rules and disclosure standards, such as the TCFD’s Recommendations or the EU SFDR, including at the national level (Russia supports the implementation of new climate-related reporting rules along with requirements introduced this year)</td>
<td>Low</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>Introduction of fines for non-compliance with requirements on greenhouse gas emissions</td>
<td>Increased operating costs (higher compliance costs, increased insurance premiums)</td>
<td>Low</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>Higher exposure to litigation</td>
<td>Increased legal costs and expenses, including from court-imposed fines</td>
<td>Low</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>New requirements for greenhouse gas emissions disclosures hindering placement of securities</td>
<td>Additional costs for maintaining a dedicated database of greenhouse gas emissions and preparing reports. Additional equity placement requirements</td>
<td>Low</td>
<td>Low</td>
<td>Establishing carbon reporting procedures, participating in national and international carbon-reporting initiatives. Engaging consultants for carbon reporting</td>
</tr>
<tr>
<td>Lack of clear regulatory targets for carbon emissions</td>
<td>Multiple possible interpretations of laws and regulations. Increased risk of non-compliance</td>
<td>Low</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>Technology risks</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Costs of transition to lower-emissions technology</td>
<td>Failed investments in new technologies. Costs of setting up new business processes. Increased costs for transitioning to lower-emissions technology</td>
<td>Low</td>
<td>Low</td>
<td>Options for hedging financial risks associated with depreciation of assets</td>
</tr>
<tr>
<td>Power outages and emergencies due to low system resilience</td>
<td>Temporary power outages due to insufficient power storage capacity and lack of upgraded power grid services (resulting from a rapid and widespread transition to renewable energy sources). Power outages are expected to become more common at some point during the transition to lower-carbon technologies</td>
<td>Low</td>
<td>Low</td>
<td>Recovery strategies for a prolonged power outage at a single location include: reconfiguration of systems using hardware that remains stable, enabling restoration if communications after a critical failure; availability and configuration of hot backups to restore major infrastructures applications; mirroring and cold backup of affected location and data recovery,</td>
</tr>
<tr>
<td>Market risks</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Change in investor behavior (increased demand for ESG products and sustainable investment)</td>
<td>Shifts in consumer preferences. Reduced demand for services not meeting climate goals due to changes in investor behavior</td>
<td>Low</td>
<td>Low</td>
<td>Introduction of ESG requirements for issuers and control over their implementation</td>
</tr>
<tr>
<td>Lower energy prices as a result of energy transition</td>
<td>Reduced revenue of issuers due to lower demand for fossil fuels</td>
<td>Low</td>
<td>Low</td>
<td>Options for hedging financial risks related to investment in high-risk lower-carbon technologies</td>
</tr>
<tr>
<td>Reduced demand for raw materials</td>
<td>Higher bankruptcy rate among issuers</td>
<td>Low</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>Increased tax expenses of issuers</td>
<td>Changes in the terms of carbon taxation, including increased tax rates, may lead to increased tax costs for issuers</td>
<td>Low</td>
<td>Low</td>
<td></td>
</tr>
</tbody>
</table>
PLANS FOR 2022

In 2022, Moscow Exchange will continue integrating climate risks into the company’s unified risk management system to accomplish the following objectives:

- introduce new risk management tools, including with scenario analysis functionality;
- integrate climate risks into the risk map and continuously monitor their characteristics;
- train employees with a focus on predicting likely events and threats;
- ensure business continuity and agility of the Group.

The Group is committed to accomplishing these objectives despite the potential impact of the global geopolitical situation on their timing.

METRICS AND TARGETS

Currently, Moscow Exchange is developing greenhouse gas emissions targets and metrics to assess its progress against the targets. The approval of climate targets and metrics is scheduled for 2022.

Our analysis of climate risks also revealed opportunities that the Group may want to explore and implement as new projects or initiatives.
MOEX GROUP’S FOCUS AREAS: ‘GREAT’

GENUINE PARTNERSHIP AND ENGAGEMENT WITH THE COMMUNITY

Performance indicators for 2019, 2020, and 2021 are disclosed in the subsection “Genuine partnership and engagement with the community” of the section “Sustainability Performance indicators for 2019, 2020, and 2021 are disclosed in the subsection “Genuine partnership and engagement with the community” of the section “Sustainability Approaches and Procedures.”

Moscow Exchange is an active participant in working groups and initiatives that deal with sustainable development.

Moscow Exchange is a member of

5 government working groups
2 global initiatives:
- Ring the Bell for Gender Equality and Ring the Bell for Financial Literacy

Over

300 financial literacy activities were held in 2021

RUB 92.5 million was invested in charity projects and sponsorship in 2021 (compared to RUB 160.7 million1 in 2020).

Over

3,500 people received support thanks to the Group’s charitable activities.

1 In 2020, an additional RUB 100 million was allocated to combat COVID-19. These costs are specific, and they are not included in the standard list of funds allocated to charity.
2 These include the beneficiaries of charities, students of the New Economic School who received scholarships, and employees of the MEPH National Research Nuclear University, who were granted a salary bonus. Beneficiaries under Moscow Exchange’s research and educational activities are not included in this metric.

Moscow Exchange Group’s objectives and the UN Sustainable Development Goals

SDG 4.3 Improve the financial literacy of the public
SDG 5.5 Contribute to ensuring equal opportunities for women in business
SDG 12.6 Develop corporate volunteering
SDG 12.8 Improve the quality and quantity of ESG information disclosed by issuers
SDG 12.13 Raise companies’ awareness of sustainability trends, standards, and practices
SDG 17.16, 17.17 Expand partnerships for sustainable development with various institutions to spread knowledge and experience in order to achieve the Sustainable Development Goals

Major highlights in 2021

Moscow Exchange Group’s efforts to improve financial literacy

2021
415
The Group is expanding its involvement in projects to develop the financial market by attracting new participants and improving their financial literacy.

Moscow Exchange’s educational programs have different formats, and most are designed for novice investors. In 2021, the influx of retail investors to the Moscow Exchange platform continued. New participants have shown to be especially active in terms of the amount of investment and their share in the total number of deals. Given the high volatility of financial markets, Moscow Exchange’s educational initiatives and training activities have taken on considerable social significance.

In the reporting period, over 300 financial literacy improvement activities were held, reaching some 1,031,000 people.

In 2021, Moscow Exchange, together with the Central Bank of Russia and the Association for Financial Literacy Improvement, introduced an educational program for novice investors at the Exchange Forum. It will become a key program of Moscow Exchange for fostering an investment culture in Russia. Educational materials include podcasts, quizzes, video clips, and meetings with professional financial market participants, who will talk about their experience and work strategies. The program will be based on the standard course “The Investor’s Path”, while the full course will be available on the Moscow Exchange School’s website.

The reporting year also saw further implementation of educational and awareness-raising programs at Moscow Exchange2. All programs are constantly being improved based on analyses of students’ behavior and their feedback.

In October 2021, Moscow Exchange participated in Ring the Bell for Financial Literacy, an annual initiative. This program comprises unified activities, workshops, and webinars that raise awareness of the importance of financial literacy for people’s lives. In 2021, 78 stock exchanges from all over the world joined the initiative.

In the reporting year, an educational course for parents, Financial Literacy for Children, was launched. Its goal is to help parents raise children who are financially literate.

Aside from its own educational programs, in 2021 Moscow Exchange continued its partner projects with the Central Bank of Russia:

- Organized the fourth All-Russian Online Test on Financial Literacy for the public and the business community. Traditionally, anyone interested can take part in the event, and there is a special category for small and medium-sized enterprises. In the reporting year, there were opportunities for both individual and group participation.
- Participated in All-Russian Financial Literacy Week and continued to be an active member of the Expert Board on Financial Literacy under the Central Bank of Russia, as well as in the working groups of the Association for the Development of Financial Literacy.
- Participated in the Literate Investor project, which provides online financial literacy lessons to adults, students, secondary school pupils, professional educational organizations, orphans and children without parental care. About 1,000 schools joined the project, and over 20,000 pupils attended webinars.
- Held the MOEX Home Talks, a series of online meetings where representatives of Moscow Exchange, together with the heads of major companies and other important market figures, discussed the principles of building a business in uncertain economic times, as well as the development prospects of the Russian economy and new opportunities for individual investors. Recordings of the meetings are available on Moscow Exchange’s website and on its official YouTube channel.
Moscow Exchange Group’s promotion of gender equality

Moscow Exchange Group believes that pursuing gender equality is necessary to create an inclusive culture within the company and in society at large.

In 2021, as part of the Ring the Bell for Gender Equality initiative, which aims to promote rights and opportunities for women, 104 stock exchanges all over the world, including Moscow Exchange, held activities dedicated to International Women’s Day.

Gender equality issues are included in the Sustainable Development Guide for Issuers compiled in 2021. Maintaining sociocultural diversity among personnel is included on the list of recommended ESG initiatives for issuers; the list also recommends analyzing gender equality and equal opportunities as part of the maturity assessment procedure.

Charity and sponsorship

203-1 203-2 413-1

Moscow Exchange’s charity activities aim to address important social problems in those areas where it has strong competencies and/or strategic interests. It also sponsors external projects to strengthen relationships with customer groups and the professional and business communities, developing the financial market of the Russian Federation.

In 2021, the Group adopted several new documents governing charity and sponsorship activities: the Moscow Exchange Sponsorship Regulation, the Regulation on the Moscow Exchange Sponsorship Committee, and the Regulation on the National Settlement Depository Charity Commission.

Under the 2022 Action Plan, the Charity Policy and the Regulation on the Charitable Policy Committee were updated and approved. These regulations align with the Group’s business priorities and the 2024 Group Strategy.

In 2021, the Group continued its cooperation with a number of charitable foundations and organizations, specifically on projects involving assistance to orphans and children with serious illnesses. Through the National Settlement Depository’s collaboration with charitable foundations such as Penetrating the Heart, BELA, Butterfly Children, Volunteers Helping Orphans, Fulfilling Dreams, Podari Zhizn, Wonderland, and Big Change, targeted aid was provided to 10 of these foundations’ beneficiaries. Financing was also provided to train volunteers and support the work of childcare professionals and psychologists. At a New Year’s charitable event gifts were given to 1,031 children under the care of these foundations.

Funds allocated to the Podari Zhizn foundation were used to purchase 465 medical masks and 50 SARS-Cov-2 antigen tests through. A total of 400 children and young adults received aid.

In cooperation with the Vera Hospice Charity Fund, 568 patients received aid. Furthermore, its hotline for terminally ill people—8 (800) 700 84 36—was unable to answer 1,492 calls from Russia. The Group supported the foundation through regular aid projects:

- Dedmorozv Autonomous Nonprofit Organization. The organization provides annual support for 148 orphans and children suffering from terminal illnesses in Perm and the Perm Region.
- Some 400 children at the Regional Children’s Hospital in Yekaterinburg received aid.
- The Blacksmith Lobov House of Mercy, located in the Yaroslavl Region, this organization provides palliative care for people suffering from terminal illnesses.

Aid was also provided to 43 WWII veterans.

The Group also supported several educational institutions. Salary bonuses were provided to seven individuals working at the MEPhI National Research Nuclear University. The Group also cooperated with the New Economic School in the following ways:

- Awarded scholarships; eight students were recipients.
- Held joint activities; Anna Obizhayeva, a Moscow Exchange professor, took part in NES Points Online as part of the topic GameStop. The lecture was viewed more than 1,300 times. The professor also covered this topic in a column in RBC that was read by over 19,300 people.

- Developed the popular science portal GURU at the New Economic School; in January–March 2022, 50 publications in Russian and English were uploaded in various formats. They were viewed over 50,000 times by over 20,000 visitors, 93% of whom were new visitors.
- Promoted science education through Economy by Ear audio lectures. Season five’s lectures were listened to about 145,000 times.

The Group also held a Donor Day and organized two events (in December and June) to collect gifts for orphanages for New Year’s and Children’s Day.

Main charity partners of Moscow Exchange Group in 2021:

- Vera Hospice Charity Fund
- Nikitsky Club of Scientists and Entrepreneurs
- Podari Zhizn Charitable Foundation
- MEPhI National Research Nuclear University
- New Economic School
- Association of Banks of Russia
- Development Foundation of the Pushkin State Museum of Fine Arts
- Journal of the New Economic Association (Autonomous Nonprofit Organization)
- Touching the Heart Charitable Foundation
- Our Children Charitable Foundation
- BELA Butterfly Children Charitable Foundation
- Volunteers Helping Orphans Charitable Foundation
- Danilovtsy Volunteer Movement
- Yelizavetsky Orphanage
- Fulfilling the Dream Charitable Foundation
- Wonderland Charitable Foundation
- Big Change Charitable Foundation
- United League LLC

Sponsorship budget structure in 2021, %

<table>
<thead>
<tr>
<th>Areas</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Education and science</td>
<td>49.5</td>
</tr>
<tr>
<td>Community engagement</td>
<td>36.4</td>
</tr>
<tr>
<td>Sports and healthy lifestyle</td>
<td>14.1</td>
</tr>
</tbody>
</table>

Charity program structure and coverage in 2021, %

<table>
<thead>
<tr>
<th>Areas</th>
<th>Donor structure</th>
<th>Cost structure by areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Science, education and improvement of the financial literacy of the public</td>
<td>0.4</td>
<td>54.7</td>
</tr>
<tr>
<td>Support for veterans</td>
<td>1.2</td>
<td>9.2</td>
</tr>
<tr>
<td>Healthcare, rehabilitation, and care for people with disabilities and those affected by COVID-19</td>
<td>69.4</td>
<td>30.1</td>
</tr>
<tr>
<td>Other</td>
<td>29</td>
<td>6</td>
</tr>
</tbody>
</table>

As of December 2021.

As of 1 April 2022.
The Moscow Exchange Council and user committees
The Moscow Exchange Council is the main permanent consultative and advisory body that oversees interaction with market participants. The Council was created to ensure fair relations between all financial market participants and to improve Moscow Exchange’s activities in this area, as well as to seek out a balance of interests between shareholders and customers of Moscow Exchange (traders, financial brokers, investors, end users of exchange services).

In 2021, the Council had 25 members,† who were approved by the Moscow Exchange Supervisory Board. Andrei Zvezdochkin, General Director of ATON Investment Company, was elected chairman of the Moscow Exchange Council.

In 2021, the Moscow Exchange Council held four meetings at which 13 issues pertinent to stakeholders were raised, including the level of satisfaction of Moscow Exchange customers (for details, see the 2021 Annual Report, p. 56).

In 2021, the Group calculated its first-ever Customer Satisfaction Index (CSI) by interviewing market participants and customers. The Group interviewed 208 customers, and the resulting score was 8.8 out of 10. This high score attests to the effectiveness of the Group’s efforts to improve its interaction with stakeholders.

A working group consisting of Moscow Exchange, the National Settlement Depository, and the National Clearing Center—together with Magram Market Research—developed the methodology and interviewed respondents. The methodology involved sending online questionnaires to a list of the Group’s contacts, after which a satisfaction index was calculated based on the customer service scores received. By ascertaining the level of satisfaction and getting customers to rate the importance of individual service components, the Group can determine priority areas to focus on in further developing customer service. Moscow Exchange Group plans to calculate the CSI on an annual basis.

There are 24 user committees operating under Moscow Exchange and the National Settlement Depository. These committees discuss issues that affect all aspects of the exchange’s activities, including regulation of public circulation and issuance of securities, corporate governance, technology, and other matters. In 2021, the user committees held over 100 meetings.

Interaction with stakeholders
Interaction with the regulatory authorities on sustainable development issues

In 2021, Moscow Exchange Group participated in five working groups tackling sustainable development issues: the Central Bank of Russia Working Group on Financial Instruments; the Central Bank of Russia Working Group on Corporate Governance and Information Disclosure; the Central Bank of Russia Working Group on Carbon Regulation; the Interdepartmental Working Group on Development of Investment Activities and Raising Extra-Budgetary Funds for Sustainable Development Projects (chaired by Russian Minister of Economic Development Maxim Reshetnikov); the Expert Council on Sustainable Development and Green Financing of the Subcommittee for Sustainable Development and Green Financing;† the Regulation on Sponsorship and Financing of External Participants and to improve Moscow Exchange’s activities in this area, as well as to seek out a balance of interests between shareholders and customers of Moscow Exchange (traders, financial brokers, investors, end users of exchange services).

As a result, aid was provided to over 3,500 children and adults in need.

A further investment of RUB 57.6 million was allocated to sponsorship initiatives.

International organizations and initiatives

Over the years, the Group has cooperated actively with international financial organizations to study global best practices and share experience.

In 2021, Moscow Exchange actively stepped up its collaborative efforts with foreign exchanges. Aside from its ongoing cooperation with Chinese financial institutions in the Equity, FX, and Bullion Markets, Moscow Exchange also built stronger business relationships with the Qatar Stock Exchange, Tashkent Stock Exchange, and Uzbek Commodity Exchange.

In 2021, an agreement on cooperation with the Qatar Stock Exchange was adopted at the 24th St. Petersburg International Economic Forum to strengthen mutual business ties.

In November 2021, at the 2nd International Financial and Banking Forum of CIS Member States in Tashkent, Uzbekistan, a cooperation agreement was signed with the Tashkent Stock Exchange. This collaboration aims to develop stock exchange tools and open up new markets. Moscow Exchange will also share its experience organizing foreign securities trading. As a joint program, the two exchanges will seek to establish trading links by cross-listing securities included in the trading floors’ quotation lists.

In November, Moscow Exchange also signed a memorandum of cooperation with the Uzbek Commodity Exchange. The exchanges also launched a project to trade in non-deliverable forwards for liquefied gas and cement using the Russian trading floor’s technologies.

Moscow Exchange Group is a member of the Sustainability Working Group of the World Federation of Exchanges (WFE)†. The Group actively participates in discussions on objectives and material aspects of priority areas of sustainable development, as well as on best practices for implementing recommended approaches, in order to make sustainability an integral part of the business.

Moscow Exchange Group also organized an event as part of the international Ring the Bell for Gender Equality initiative.

The Group participates in the UNEP Sustainable Stock Exchanges (SSE) global initiative, a unified platform for studying how exchanges, in collaboration with investors, companies (issuers), regulators, politicians, and competent international organizations, can improve work practices to increase sustainability and facilitate responsible investing, including financing of the UN Sustainable Development Goals.

Partnership with institutions of higher education

In 2021, Moscow Exchange Group collaborates with a number of Russian universities on an ongoing basis. It organizes field-specific contests and conferences to develop students’ financial market knowledge and skills.

To raise awareness and promote its brand among students, the Group participates annually in career fairs. It also publishes job vacancies in such institutions’ career groups. In 2021, the Group took part in the I Am a Professional academic competition for students; a ‘career marathon’ was organized for Economics majors, as well as a student conference on financial markets, held in conjunction with the Higher School of Economics.

In 2021, the Group actively promoted cooperation with the IT community by holding specialized meetups, developing IT Community, and participating in the case championship Challengelive IT Cup.

Some activities are held annually as part of Moscow Exchange’s cooperation with institutions of higher education. Since 2020, Moscow Exchange Group has been awarding scholarships to students and professors of the New Economic School. Thanks to this support, talented students and teachers can focus on their research work and realize their potential. In 2021, eight students of the New Economic School received scholarships.

Every year, students undergo internships at the Group’s companies, with the best interns being offered jobs. In 2021, 14 of the 67 interns were hired.

++ Detailed information on initiatives and partner relationships with international organizations can be found in the section “Sustainability Approaches and Procedures.”

† As of 31 December 2021.

†† At the following higher educational institutions: the MEPhI National Research Nuclear University, the New Economic School, Lomonosov Moscow State University, the Financial University, the Higher School of Economics, and the National Research University ‘Moscow Power Engineering Institute.’

A third joint conference, MOEX Progress: Development of the Russian Financial Market, was held on 26 May 2021.

Appendix 6

At the following higher educational institutions: the MEPhI National Research Nuclear University, the New Economic School, Lomonosov Moscow State University, the Financial University, the Higher School of Economics, and the National Research University ‘Moscow Power Engineering Institute.’

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A third joint conference, MOEX Progress: Development of the Russian Financial Market, was held on 26 May 2021.
In 2021, a series of lectures on financial markets was given to postgraduate students. Group employees also give lectures and hold seminars on financial risk management at St. Petersburg School of Economics and Management.

Support for political parties and organizations

Moscow Exchange Group maintains a neutral position when it comes to political and religious activities, but it does not impinge upon its employees’ right to choose their own views, nor does it prevent them from pursuing such activities at their own cost and as private individuals. In 2021, the Group did not make any donations to political organizations.

Plans for 2022

Under Moscow Exchange School, a project for individual investors, the Group plans to train 150,000 new investors through the accredited course “The Investor’s Path”, as well as other courses.

Moscow Exchange Group also promotes modern corporate reporting requirements, thereby contributing significantly to more transparent markets. The Exchange has developed infrastructure to foster a local investor base, and it provides access to funding for innovative companies, as well as small and medium-sized enterprises.

RESPONSIBLE INVESTING AND SUSTAINABLE GROWTH

For comprehensive performance metrics for 2019, 2020 and 2021, see the subsection “Responsible investing and sustainable growth” of the section “Sustainability Data”. For the key policies, procedures, and responsible departments, see the subsection “Responsible investing and sustainable growth” of the section “Sustainability Approaches and Procedures”.

Exchanges contribute significantly to raising capital for improving sustainability. They also play an important role in in creating financing facilities to help modernize the economy in line with climate goals.

As a member of the Sustainable Stock Exchanges (SSE) initiative, Moscow Exchange works hard to develop sought-after financial ESG instruments and promote them among Russian companies, investors, and financial institutions. Moscow Exchange is striving to create a new market segment for environmentally and socially significant projects that are appealing for issuers and investors.

Moscow Exchange promotes responsible investment both as a company and as a provider of financial infrastructure, recognizing that the generation of long-term sustainable returns is dependent on well-governed social, environmental, and economic systems.

Major highlights in 2021

Sustainability sector

Moscow Exchange Group’s objectives and the UN Sustainable Development Goals

- SDG 8.3, 9.3 Increase growth opportunities and access to financial markets for small and medium-sized enterprises
- SDG 8.10 Develop financial infrastructure for better access to capital markets, promote the development of a local investor base
- SDG 9.1 Increase access to financial services for retail investors
- SDG 9.b Increase growth opportunities and access to financial markets for companies that develop innovative products
- SDG 12.6, 12.8 Improve the quality and quantity of ESG information disclosed by issuers
- SDG 12.6, 13.3 Develop instruments to promote responsible investment

As part of the work of the Bond Issuers Committee and user committees, Moscow Exchange performs regular analyses of feedback from customers and market participants about new ESG products; it also works to increase their awareness on such topics.

This subsection covers the key responsible investment instruments of Moscow Exchange and its educational programs for market participants.

In 2019, Moscow Exchange Group established the Sustainability sector to help issuers raise funds for projects that comply with the UN SDGs and national projects of the Russian Federation. The Sustainability sector consists of four segments: green bonds, social bonds, sustainability bonds (as of 2021), and a segment for national and adaptation projects. For more details on the Sustainability sector and its core listing rules, see the section “Sustainability Approaches and Procedures”.

In 2021, the Group expanded its offerings of sustainability-related products and services for issuers and investors committed to sustainable development strategies.
The following changes have been made in the Sustainability sector:

- a new segment, Sustainability Bonds, has been added to help raise funds for both environmental and social projects;
- the National Projects segment has been renamed the National and Adaptation Projects segment. It will include bonds to raise funds for projects compliant with the VEB.RF Taxonomy goals.
- provisions have been made for an independent external compliance audits of issuers’ projects and policies’ with the Russian Green Finance Guidelines and the VEB.RF Taxonomy;
- Moscow Exchange is exploring the possibility making ESG disclosures mandatory for issuers.

As of 31 December 2021, there were 22 issues of ESG bonds by 13 issuers in the Sustainability sector, 10 of which were issued in 2021 (five issues of green bonds, two issues of social bonds, and three issues in the national and adaptation projects segment, including the first-ever issue of adaptation bonds in Russia). In total, compared to 2020, the value of bonds traded was up by a factor of 14.7, amounting to RUB 169.4 billion, with green bonds accounting for the largest share.

According to NSD, financial market participants invested RUB 152 billion in ESG bonds in 2021, and, as of the end of the year, held securities worth RUB 175.4 billion on their accounts.

Sustainability sector structure by bond type as of the end of 2021, RUB billion

<table>
<thead>
<tr>
<th>Bond Type</th>
<th>Value (RUB billion)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social bonds</td>
<td>47.8</td>
</tr>
<tr>
<td>National and adaptation</td>
<td>42.6</td>
</tr>
<tr>
<td>Sub-national</td>
<td>32.5</td>
</tr>
<tr>
<td>sub-national</td>
<td>25</td>
</tr>
<tr>
<td>National and adaptation</td>
<td>25</td>
</tr>
<tr>
<td>social bonds</td>
<td>20</td>
</tr>
<tr>
<td>Green bonds</td>
<td>13</td>
</tr>
<tr>
<td>Total</td>
<td>193</td>
</tr>
</tbody>
</table>

Building a market for trading in carbon units

In 2021, Moscow Exchange and a major Russian bank agreed to implement a joint project to build the Russian carbon trading market. The Supervisory Board of Moscow Exchange approved it.

The project is vital for fulfilling Russia’s obligations under the Paris Agreement and keeping exporters competitive. The transition to a lower-carbon economy requires an intermediate adaptation stage, with climate-related projects as an instrument for regulating emissions. These projects aim to establish trading in carbon units to help harmonize economic relations between commodity market participants, subject to agreements being reached at international level to set out the rules for the new market mechanisms.


After studying the issue, the Ministry of Economic Development proposed the creation of an operator for the carbon unit registry with the participation of Moscow Exchange. The corresponding infrastructure is being developed based on an existing legal entity, Kontur JSC.

As a partial operator of the carbon unit registry, Moscow Exchange’s tasks will include:
- supporting processes on the operator’s platform;
- participating in the development of methodological and regulatory documents governing the relevant processes, and interacting with customers of the registry, public authorities, and international organizations;
- drafting proposals for participation in the organization of carbon unit trading and implementing such proposals together with other parties.

In cooperation with other interested parties, Moscow Exchange plans to build a regulatory framework and a system of requirements for the sale of GHG emission permits and green certificates.

This system is expected to reduce negative anthropogenic impacts on the climate to mitigate certain acute and chronic climate-related risks. The centralized emissions trading system may be based on limited emission allowances (cap-and-trade system) or on their specific levels (baseline-and-credit). Companies that pollute will acquire permits for emissions while also implementing initiatives for the reduction of GHG emissions. NSD may become an operator of the carbon unit registry.

ESG guidelines

To better integrate ESG principles into companies’ operations, it is vital for exchanges the world over to educate and inform participants on financial and commodity markets. Moscow Exchange holds conferences and webinars, and also supports thematic partner events.

In the summer of 2021, Moscow Exchange developed and published the ESG Disclosure Guidelines for companies seeking to establish sustainable business models. These guidelines include recommendations on developing ESG strategies and improving corporate governance. They also cover practical aspects of the financial market, with a focus on responsible investment principles and ESG best practices.

The Guidelines can be used to develop or improve corporate ESG strategies and promote higher-quality corporate governance and a better understanding of ESG-oriented sustainable business models. The presentation unveiling the Guidelines was attended by 361 participants.

ESG indices

Moscow Exchange Group calculates and tracks Russia’s first sustainability indices. This is a joint project with the Russian Union of Industrialists and Entrepreneurs (RSPP). The MOEX-RSPP ESG indices help reveal a correlation between the quality of disclosures on responsible business practices and the yield dynamics of issuers’ stocks.
A new version of the Sustainability Vector Index, the MOEX-RSPP Russian Companies Sustainability Vector Index, was launched in 2021. The methodology factors in regulatory requirements for non-state pension funds, making it possible to invest pension savings in a basket of index-linked securities or a financial product whose underlying asset is the new indicator.

Moscow Exchange has also started calculating the RSPP-RSHB Russian Corporate Eurobonds ESG Index. This derivative index has become the basis for a new ETF managed by RSHB Asset Management.

The year 2021 saw the introduction of tighter requirements on the liquidity of securities included in sustainability stock indices: a liquidity ratio was introduced, and free float requirements were put in place (regulating the share of stocks that are publicly traded, including those available to retail investors).

A total of 43 indicators were used to calculate the RSPP Responsibility and Transparency Index in 2021.

Indicators used in the Responsibility and Transparency Index, 2021, %

- Economic: 23%
- Social (personal): 14%
- Social (general public): 33%
- Environmental: 2%
- Governance: 28%

Number of securities listed on ESG indices

<table>
<thead>
<tr>
<th>Index</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>MOEX-RSPP Responsibility and Transparency</td>
<td>29</td>
</tr>
<tr>
<td>Index</td>
<td></td>
</tr>
<tr>
<td>MOEX-RSPP Sustainability Vector Index</td>
<td>26</td>
</tr>
<tr>
<td>MOEX-RSPP Russian Companies Sustainability</td>
<td>24</td>
</tr>
<tr>
<td>Vector Index</td>
<td></td>
</tr>
<tr>
<td>MOEX-RSPP — RSHB Russian Corporate ESG</td>
<td>17</td>
</tr>
<tr>
<td>Index</td>
<td></td>
</tr>
</tbody>
</table>

ESG ETFs

The establishment of derivative indices based on the ESG indices of Moscow Exchange in 2021 led to the launch of four new ESG ETFs: ESGR ETF RSHB-MOEX-RSPP VecTR (ESGR, the second ETF managed by RSHB Asset Management LLC), SBRI ETF Responsible Invest (SBRI), WIMF ETF Russian Equity ESG (VTBF ETF) and TSST ETF TINKOFF ESG LEADERS (TSST).

The new ETF of RSHB was awarded “First Exchange-Traded Fund in the ESG Segment” at the Investfunds Awards. The award is given to companies that show outstanding results in the collective investment market.

Index structure by industry in 2021, %

- Russian Companies Sustainability Vector Index: 27.8%
- Sustainability Vector Index: 25.8%
- Sustainability Vector Total Return Index: 49.0%
- MOEX Russia Index: 42.6%

Indices performance, 2011–2021, %

- December 2011: 100%
- June 2012: 200%
- December 2012: 300%
- June 2013: 400%
- December 2013: 500%
- June 2014: 600%
- December 2014: 700%
- June 2015: 800%
- December 2015: 900%
- June 2016: 1000%
- December 2016: 1100%
- June 2017: 1200%
- December 2017: 1300%
- June 2018: 1400%
- December 2018: 1500%
- June 2019: 1600%
- December 2019: 1700%
- June 2020: 1800%
- December 2020: 1900%
- June 2021: 2000%
- December 2021: 2100%
Growth sector

In 2021, MOEX Group extended access to funds for small and medium-sized enterprises (SMEs) in the Growth sector, thereby facilitating their growth. The number of SMEs included in the Growth sector and the volume of offerings grew, reaching the targets of the national project “Small and Medium-Sized Enterprises and Support of Individual Entrepreneurship Initiatives”

SME bonds placed in the Growth sector, 2019–2021

The Growth sector of Moscow Exchange1 was created for public offerings and for circulating the securities of promising small and medium-sized enterprises for public offerings and for circulating the securities of innovative companies using its exchange mechanisms and through cooperation with development institutions.

To be included in the Growth sector, bonds need a credit rating of at least BBB on the Russian scale. In view of the current situation, until 1 October 2022 Moscow Exchange has decided to use the credit ratings of the issuer, bond issue, or guarantor (endorser), assigned as of 1 February 2022.

As of 31 December 2021, 47 bond issues of 28 SMEs were traded in the sector. The total volume of SME bond placements amounted to RUB 7.9 billion, which RUB 2.9 billion above the target under the national project.

To subsidize listing preparations, 16 issuers received RUB 24.85 million in pre-listing subsidies, and 20 transactions received coupon-interest income subsidies totaling RUB 128.3 million.

As a COVID-19-related support measure, Moscow Exchange Group has improved accessibility to the bond market for SMEs by waiving charges for listing bonds for flotation of up to RUB 400 million. In 2021, the grace period was extended up to 31 December 2022.

Innovation and Investment Market

Moscow Exchange contributes to the development of the innovation market by easing access to the financial market for high-tech companies. Moscow Exchange’s goal is to attract investment to innovative companies using its exchange mechanisms and through cooperation with development institutions.

By the end of 2021, 28 securities were being traded on the Innovation and Investment Market (IIM) sector, including seven shares, two global depositary receipts (GDRs), 16 bonds, one exchange-traded fund (ETF), and two closed-end unit investment funds (CUIF). The total capitalization of the sector amounted to about RUB 460 billion. The trading volume exceeded RUB 300 billion (+20% YoY). IIM issuers include companies from the following industries: biotech and medical technologies, internet and media, IT and telecommunications, and innovative technologies. In 2021, nine new securities were offered on the IIM.

Number of IIM securities by type, 2020-2021

Trading volume in the IIM Sector, RUB billion

To encourage high-tech companies to list on the stock exchange, the following types of government support are available:

- tax relief on income from the sale or other disposal of shares and bonds of Russian entities, and of investment units that are securities from the high-tech (innovative) sector of the economy, provided that they have been continuously owned by the taxpayer for at least one year prior to the date of their sale (effective until 31 December 2022);
- as part of the initiative “Takeoff – From Startup to IPO”, approved by the Russian Government

In 2022, small innovative enterprises will be eligible for grant support to co-finance innovative projects, with the grants to be provided by Federal State Institution Foundation for Assistance to Small Innovative Enterprises in Science and Technology. Each grant is capped at RUB 25 million; part of that amount may be spent on listing (legal support fees, investment banking services, marketing, and other services).

Outlook for 2022

In 2022, the Group plans to keep improving its responsible financing practices:

- continue to develop the Sustainability sector by issuing new types of bonds; create platforms for ESG market data; extend the ESG index family; improve the non-financial reporting practices of issuers;
- launch a carbon trading system;
- host more educational events for issuers and market participants to share knowledge and experience in ESG management and responsible investment;
- improve the Group’s own ESG practices and sustainability reporting system;
- meet KPIs under the national SME projects in terms of the size of securities offerings;
- boost the IIM Sector through the “Takeoff – From Startup to IPO” government initiative.

1 In cooperation with the Central Bank of Russia, the Ministry of Economic Development of the Russian Federation, SME Corporation, and SME Bank JSC.
ENVIRONMENT OF RESPECT AND EMPOWERMENT

- Best Employer in Finance & Investments according to Changellenge 2021
- 56% increase in the annual average number of training hours per employee compared to 2020
- 43% of the Group’s headcount are women, which is comparable with other exchanges

Building a comfortable, fair, and encouraging work environment is an overriding priority of Moscow Exchange Group. Over the past several years, Moscow Exchange has put considerable efforts into building a culture of respect and trust in the workplace and increasing employee satisfaction and engagement. Today, the Group continues to take part in dynamic activities to that end.

Care for our employees has been a key focus area of Moscow Exchange throughout 2021, which is reflected in the Sustainability Roadmap. Priority areas include pursuing gender equality, encouraging a healthy work-life balance, increasing the flexibility of the working environment, and ensuring the physical and emotional well-being of staff. The Group’s management seeks new approaches to developing expertise, managing the agenda, and setting ambitious and quantifiable objectives.

Moscow Exchange Group’s objectives and the UN Sustainable Development Goals

- SDG 4.4 Develop employees’ professional and technical skills
- SDG 4.7 Train employees to effectively manage sustainability within the Group
- SDG 5.5 Ensure gender equality in the Group
- SDG 8.5, 8.6, 8.7, 8.8 Ensure decent working conditions for employees

For 2019, 2020, and 2021 metrics, see the subsection “Environment of respect and empowerment” of the section “Sustainability Data”. For key policies, procedures, and departments, see the relevant subsection of the section “Sustainability Approaches and Procedures”.

This subsection describes the activities and initiatives of Moscow Exchange Group as it seeks to provide good working conditions, create a safe and comfortable workplace, and uphold the basic principles of fostering a culture of development and equal opportunity. The Group places particular emphasis on training and professional development, including increasing employee awareness of sustainability issues.

2021 highlights

In 2021, Moscow Exchange Group was highly ranked in the Changellenge Best Company Award 2021, a rating of employers among the most active demographic—students and graduates of Russia’s top 30 universities:
- #1 employer in Finance & Investments;
- #34 of the top 100 companies for starting a career, according to students majoring in Business;
- a top 50 company for starting a career, according to students majoring in IT;
- one of the best employers, according to students of the Financial University and top universities of the Urals and Siberia.

Furthermore, in 2021, Oleg Vyugin, Chairman of the Moscow Exchange Supervisory Board, won “Best Independent Director”, and was also ranked third in the annual “Top 1,000 Russian Managers” rating compiled by the Russian Managers Association and Kommersant Publishing House.

In 2021, Moscow Exchange Group launched a project to introduce HR electronic document management (EDM). The project is scheduled to be implemented in 2022.

Employee engagement and efficiency

The total employee headcount at Moscow Exchange Group increased by 11% in 2021. Employee turnover was 18%. The growth of this indicator in 2021 can be attributed to changes in the situation surrounding the COVID-19 pandemic, which caused employee turnover to drop in 2020, only to rise again in 2021. The Group did not make any staff cuts in the reporting year or over the past three years.

After reviewing the reasons why employees quit, the Group takes appropriate steps to reduce employee turnover. To this end, Moscow Exchange monitors employee engagement. In 2020, the Supervisory Board approved a new long-term incentive program for 2023 to 2025 with a view to retaining key personnel and ensuring they are focused on the long-term development of the business of the entire Group. The Group also implements a long-term incentive program for key IT professionals, under which part of the employees’ variable remuneration consists of phantom shares.

Every year, the Group conducts a comprehensive study of employee engagement. In 2021, 86% of the staff took part. Polling yielded the following results:
- engagement – 86.2%;
- loyalty – 81.4%;
- satisfaction – 87.9%.

Key areas of development were identified through the survey. In order to create a plan to enhance the efficiency of operations, the Group organized focus groups, identifying critical areas for employees, such as HR issues, career planning, training, remuneration, and work-life balance. Relevant activities and discussions were subsequently arranged.

For more details, see the subsection “Diversity and equal opportunity” of the current section.

4 For more details, see the subsection “Diversity and equal opportunity” of the current section.

5 This indicator was estimated using the GRI methodology. “Employee turnover” means the ratio of all employees who left the company during the reporting year to the number of employees at year end.

6 This indicator was calculated as the ratio of the number of employees who resigned voluntarily over the year to the average number of employees in the reporting year.

7 Phantom shares (incentives) are an incentive tool for employees, whereby the employee holds a virtual share in the company and receives dividends, but does not beneficially own the shares.

8 Detailed information is provided in the section “Sustainability Approaches and Procedures”.

In 2021, Moscow Exchange consistently observed the following policies and procedures:

- SDG 5.5 Ensure gender equality in the Group
- SDG 4.4 Develop employees’ professional and technical skills
- SDG 4.7 Train employees to effectively manage sustainability within the Group
- SDG 4.4 Develop employees’ professional and technical skills
- SDG 8.5, 8.6, 8.7, 8.8 Ensure decent working conditions for employees

This subsection describes the activities and initiatives of the Moscow Exchange Group as it seeks to provide good working conditions, create a safe and comfortable workplace, and uphold the basic principles of fostering a culture of development and equal opportunity. The Group places particular emphasis on training and professional development, including increasing employee awareness of sustainability issues.
Employees of Moscow Exchange Group have access to a large library of training materials. Apart from compulsory training, the Group has prepared courses that teach hard and soft skills, and it conducts workshops on communications skills in the context of COVID-19 and the switch to remote working arrangements. A total of 954 employees took part in various educational programs or training sessions in 2021.

Due to the pandemic, most training materials are now available online. This has made training courses more accessible, allowing employees to take them at their own convenience.

- Since 2019, the Group has been successfully implementing a mentorship program to support young specialists.
- For managers responsible for hiring, training sessions are held on a regular basis to develop their skills in interviewing candidates.
- IT teams have been further integrated into the Group: in 2021, ten teams were operating in MS Teams, and ten meetings were arranged (four of which were led by invited speakers), and a page was created on the intranet. In total, there are 394 people on the IT teams of Moscow Exchange Group.

In 2021, the Group began implementing quarterly planning, which allows it to be more flexible in its response to employee requests for training. A compulsory training course for novice managers was developed, and the Group implemented a checklist of mandatory actions by managers as part of the regular management process.

Since 2020, Moscow Exchange Group has been organizing sustainable development training for employees who work in the Group’s core business areas. In 2021, it continued to offer courses on OHS, IT, anti-corruption policies and methods (including issues associated with business gifts and conflicts of interest), and risk management. The number of courses not completed by participants fell.

Diversity and equal opportunity

- In terms of the percentage of women among the workforce, the Group adheres to global best practices. Despite some challenges, particularly the fact that there are far fewer women in the Russian IT sector than men, the Group takes active steps to hire women in its IT departments.

    | Percentage of women on the Supervisory Board, % |
    |-----------------------------------------------|
    | MOEX   | LSE  | ICE  | Deutsche Börse | HKEx | NASDAQ |
    | 17     | 33   | 33   | 38              | 23   | 36     |

- Moscow Exchange Group offers competitive pay. In 2021, the average pay of entry-level specialists and workers, including bonuses, was 4.6 times higher than the minimum wage in Moscow on 1 January 2021.

    | Percentage of women in senior management positions, % |
    |------------------------------------------------------|
    | MOEX   | LSE  | ICE  | Deutsche Börse | HKEx | NASDAQ |
    | 23     | 38   | 27   | 17              | 50   | 46     |

- In 2021, the companies of the Group started using electronic employment record books, concluding agreements on remote work, and making direct payments from the Social Insurance Fund in cases of sick leave. Due to changes in way annual performance reviews are conducted, NCC updated its Regulation on Employee Bonuses and Regulation on Corporate Social Support of Employees.

    | Percentage of women in the total employee headcount, % |
    |-------------------------------------------------------|
    | MOEX   | LSE  | ICE  | Deutsche Börse | HKEx | NASDAQ |
    | 43     | 42   | 30   | 40              | 41   | 30     |

Moscow Exchange Group focuses on the social and cultural diversity of its employees, providing them with equal opportunities in terms of training, career development, and social benefits. This approach leads to a more productive and comfortable work environment.

The Group follows the recommendations of the Central Bank of Russia in forming and maintaining the continuity of the Supervisory Board; including based on the principle of gender diversity.

In terms of the percentage of women among the workforce, the Group adheres to global best practices. Despite some challenges, particularly the fact that there are far fewer women in the Russian IT sector than men, the Group takes active steps to hire women in its IT departments.

In 2021, Moscow Exchange Group strengthened its focus on preventive action to mitigate risks to employees’ health and ensure their well-being during the COVID-19 pandemic. The Group complied with all instructions issued by regulatory authorities, and also took additional steps to make working at and outside the office more comfortable. For more details, see the subsection “Overview of the COVID-19 response”.

In some circumstances, employees may work from home or under a flexible work schedule. In accordance with the Labor Code of the Russian Federation, and at an employee’s request, expectant mothers are entitled to work fewer hours, as are parents (guardians, caregivers) of children under the age of 14 or disabled children under 18 years of age, as well as employees who are helping care for a sick family member. Both women and men (at the family’s discretion) are granted leave to care for children under three years of age; mothers who go back to work ahead of time are provided breaks to feed infants younger than a year-and-a-half old; an additional four paid days off per month are given to care for a disabled child.

Although the working conditions at Moscow Exchange Group do not entail any significant risks of personal injury or occupational illness, the Group strives to maintain safe working conditions and ensure the health and well-being of its employees.

In 2021, Moscow Exchange Group began implementing quarterly planning, which allows it to be more flexible in its response to employee requests for training. A compulsory training course for novice managers was developed, and the Group implemented a checklist of mandatory actions by managers as part of the regular management process.

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    | 43     | 42   | 30   | 40              | 41   | 30     |
Plans for 2022

Moscow Exchange will continue its efforts to maintain decent work conditions for its employees. However, given the difficult geopolitical situation, the Group is open to the possibility of adjusting its plans, including those enshrined in the Sustainability Roadmap. Nevertheless, the Group will continue working on its main initiatives planned for 2022 and beyond by adapting them to the new circumstances; the sustainability projects that are currently underway will most likely continue. The Group’s management will spare no efforts to preserve jobs and the social programs of greatest importance to its employees.

As part of the Sustainability Roadmap, the Group has planned the following initiatives and activities:

- continue to promote and raise awareness of gender equality in Russia, adding corresponding provisions to the new version of the Moscow Exchange Social Policy, which is to be prepared in 2022;
- develop a program to promote inclusion of people with disabilities;
- continue to allow flexible work schedules;
- review emotional health issues experienced by employees and work towards potential solutions;
- assess risks of human rights violations.

The Group will also continue to raise awareness of the sustainability agenda among its employees, helping them develop their knowledge and skills in this area.

Moscow Exchange Group adheres to best practices and standards in corporate governance, ethics, and business conduct. The Group is also developing a system for internal control and risk management. Sustainability principles are reflected in the activities of the Group’s corporate governance bodies. The scope of issues considered at Supervisory Board meetings is expanding. Moscow Exchange continues to develop policies to regulate the management of sustainability-related issues, implementing best practices in business conduct among the Group’s companies, in the supply chain, and also among issuing companies and other financial market participants.

This subsection describes the current efforts of Moscow Exchange Group to develop a compliance system, as well as projects aimed at countering corruption and ensuring compliance with principles of ethical business conduct. It also covers measures aimed at further improving corporate governance at the Group’s companies.

ADVANCED GOVERNANCE AND RESPONSIBLE BUSINESS PRACTICES

Figures for 2019, 2020, and 2021 are available in the subsection “Advanced governance and responsible business practices” of the section “Key Sustainability Data”. See the subsection “Advanced governance and responsible business practices” of the section “Sustainability Approaches and Procedures” for information on key policies, procedures, and responsible departments.

67% of the members of the Supervisory Board are independent directors

100% of the members of the Audit Committee and the Nomination and Remuneration Committee are independent directors

0 incidents of corruption or violations of the Code of Professional Ethics

98.3% of procurements come from local suppliers

17% of the members of the Supervisory Board of Moscow Exchange are women, which is higher than the national average.

Moscow Exchange Group has developed a Tax Strategy

Moscow Exchange Group adheres to best practices and standards in corporate governance, ethics, and business conduct. The Group is also developing a system for internal control and risk management. Sustainability principles are reflected in the activities of the Group’s corporate governance bodies. The scope of issues considered at Supervisory Board meetings is expanding. Moscow Exchange continues to develop policies to regulate the management of sustainability-related issues, implementing best practices in business conduct among the Group’s companies, in the supply chain, and also among issuing companies and other financial market participants.

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2021 highlights

Corporate governance

The corporate governance structure of Moscow Exchange consists of the General Shareholders Meeting, the Supervisory Board, the Executive Board, and Chairman of the Executive Board, who is the sole executive body.

General Shareholders Meeting

Moscow Exchange’s share capital structure is notable for:

- the absence of a controlling shareholder or shareholders with a stake exceeding 12%;
- high amount of shares in free circulation (over 60%).

Moscow Exchange strives to balance its shareholders’ interests; it performs its infrastructural function on the financial market effectively.

According to the Charter of Moscow Exchange, each share entitles the holder to one vote at the General Shareholders Meeting. See the 2021 Annual Report of Moscow Exchange and the official website for more details on the decisions made at general shareholders meetings.

APPENDICES
Supervisory Board

In order to comply with the corporate governance requirements established by the Listing Rules, as well as to ensure the complete compliance with the Corporate Governance Code of the Central Bank of the Russian Federation, the following measures were taken in 2021:

- All data holds true as of 31 December 2021.

The Supervisory Board keeps abreast of critical issues through a specialized system for supporting the governing bodies’ activities. Once information on critical issues is received, all Supervisory Board members are sent a special notification. In the reporting year there were no critical issues that would require the involvement of members of the Supervisory Board. See the 2021 Annual Report, p. 65–73, for the issues considered by the Supervisory Board.

Independent directors account for 100% of the Audit Committee.

In 2021, the following committees operated under the Supervisory Board, carrying out preliminary consideration of issues and preparing decision-making recommendations:

- Strategic Planning Committee;
- Audit Committee;
- Nomination and Remuneration Committee;
- Risk Management Committee;
- Technical Policy Committee.

See the 2021 Annual Report, p. 65, for further information on the composition and functions of the Supervisory Board and its committees, as well as on the procedures for appointing their members.

The Supervisory Board approves risk appetite and risk management policies (including by topic), reviews reports on the risk management system, and decides on corrective measures based on those reports. The Supervisory Board has a Risk Management Committee that also involves other companies of the Group in its activities.

Independent directors account for 100% of the Audit Committee.

Independent directors account for 100% of the Nomination and Remuneration Committee.

In 2021, supervisory directors were elected to the 12-person Supervisory Board:

- All data holds true as of 31 December 2021.

8 independent directors were elected to the 12-person Supervisory Board;

- compliance with the independence criteria established by the Listing Rules was confirmed for all independent directors;

- an independent director was elected chairman of the Supervisory Board;

- the Audit Committee, as well as the Nomination and Remuneration Committee, included only independent members of the Supervisory Board.

See the 2021 Annual Report, pp. 65–73, for the composition of the Supervisory Board, as well as for the procedures for the appointment, induction, and training of Supervisory Board members.

In 2021, the Supervisory Board addressed the following issues:

- development of the carbon market and Moscow Exchange Group’s contribution to creating infrastructure for carbon accounting and trading;

- UN SDGs that are priorities for Moscow Exchange, as well as relevant tasks and performance indicators.

The companies of the Group plan to carry out further work on these issues.

Committees under the Supervisory Board

<table>
<thead>
<tr>
<th>Committee</th>
<th>Key tasks</th>
<th>Chairman</th>
<th>Members</th>
<th>Number of meetings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strategic Planning Committee</td>
<td>Improving the efficiency of Moscow Exchange and its subsidiaries through preliminary consideration and preparation of suggestions for the Supervisory Board on the drawing-up, development, and implementation of long- and medium-term strategic plans and objectives for Moscow Exchange</td>
<td>Ramón Adarraga</td>
<td>Paul Bodart, Oleg Vyugin, Dmitry Eremeev, Maxim Krasnykh, Oskar Hartmann</td>
<td>10</td>
</tr>
<tr>
<td>Audit Committee</td>
<td>Ensuring the effective work of the Moscow Exchange Supervisory Board in resolving issues related to control over financial and economic activities (including audit independence), verifying the absence of conflicts of interest, and evaluating the findings of audits of Moscow Exchange’s financial statements</td>
<td>Paul Bodart</td>
<td>Ramón Adarraga, Maria Gordon</td>
<td>10</td>
</tr>
<tr>
<td>Nomination and Remuneration Committee</td>
<td>Ensuring the effective work of the Supervisory Board in resolving issues related to the activities of Moscow Exchange and of companies under the direct or indirect control of Moscow Exchange with regard to nomination and remuneration of the members of supervisory boards and governing bodies, as well as of other key executives and members of audit committees</td>
<td>Alexander Izosimov</td>
<td>Oleg Vyugin, Maria Gordon, Maxim Krasnykh</td>
<td>13</td>
</tr>
<tr>
<td>Risk Management Committee</td>
<td>Participating in the improvement of the risk management system of Moscow Exchange and the Group in order to improve the reliability and efficiency of Moscow Exchange’s operations</td>
<td>Vadim Kulk</td>
<td>Valery Goreglyad, Sergey Lykov</td>
<td>12</td>
</tr>
<tr>
<td>Technical Policy Committee</td>
<td>Developing and improving the efficiency of Moscow Exchange and the Group by preparing recommendations and expert opinions covering technical policy and the development of IT and software for the Supervisory Board, the boards of directors (supervisory boards) of the Group’s companies and their committees, and for the governing bodies of Moscow Exchange and the Group’s companies</td>
<td>Vadim Kulk</td>
<td>Dmitry Eremeev, Maxim Krasnykh</td>
<td>6</td>
</tr>
</tbody>
</table>

102-22 102-23 102-24

102-29

OVERVIEW OF MOSCOW EXCHANGE GROUP’S REPORTING SUITE

AS OF 31 DECEMBER 2021

SUSTAINABILITY APPROACHES AND PROCEDURES

APPENDICES
Remuneration of Supervisory Board members in 2021, RUB thousand

<table>
<thead>
<tr>
<th>Supervisory Board member</th>
<th>Travel expenses and other payments</th>
<th>Total remuneration for work on the Supervisory Board and committees, accounting for indexation</th>
<th>Remuneration for participation in governing bodies of subsidiaries</th>
<th>Total amount of all payments and compensation 2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ramon Morales Adanaga</td>
<td>0</td>
<td>12,583</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12,583</td>
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<tr>
<td>Paul Anne F. Bodart</td>
<td>0</td>
<td>15,380</td>
<td>0</td>
<td>5,770</td>
<td>5,820</td>
<td>11,590</td>
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<tr>
<td>Oleg V. Vyugin</td>
<td>1,850</td>
<td>20,510</td>
<td>0</td>
<td>17,800</td>
<td>24,627</td>
<td>22,360</td>
</tr>
<tr>
<td>Andrey F. Golikov (member of the Supervisory Board until 28 April 2021)</td>
<td>0</td>
<td>14,843</td>
<td>0</td>
<td>3,822</td>
<td>20,029</td>
<td>26,108</td>
</tr>
<tr>
<td>Maria V. Gordon</td>
<td>714</td>
<td>13,764</td>
<td>0</td>
<td>8,332</td>
<td>14,726</td>
<td>14,478</td>
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<tr>
<td>Valery P. Goreglyad</td>
<td>0</td>
<td>10,930</td>
<td>0</td>
<td>10,433</td>
<td>10,930</td>
<td>10,930</td>
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<tr>
<td>Dmitry N. Eremeev</td>
<td>0</td>
<td>5,398</td>
<td>0</td>
<td>7,029</td>
<td>8,750</td>
<td>12,026</td>
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<tr>
<td>Bella I. Zlatkis</td>
<td>0</td>
<td>13,764</td>
<td>0</td>
<td>9,321</td>
<td>15,379</td>
<td>13,764</td>
</tr>
<tr>
<td>Alexander V. Iosimov</td>
<td>0</td>
<td>12,954</td>
<td>0</td>
<td>0</td>
<td>12,954</td>
<td>12,954</td>
</tr>
<tr>
<td>Oskar Hartmann</td>
<td>0</td>
<td>11,335</td>
<td>0</td>
<td>3,250</td>
<td>4,000</td>
<td>11,065</td>
</tr>
</tbody>
</table>

Evaluation of the effectiveness of the Supervisory Board and its committees

102-28 103-3

An internal evaluation of the Supervisory Board’s effectiveness took place in 2021, in the course of which its activities and those of its committees were analyzed. Priority areas for next year were identified, with a view to improving current corporate governance processes related to the performance of functions and separation of the governing bodies’ powers. The evaluation was carried out on an online platform, ensuring the anonymity of the participants and giving Supervisory Board members the freedom to express significant critical comments.

In order to ensure that the responses were representative, ten directors took part in the self-evaluation procedure. Most issues were commended by the members of the Supervisory Board.

All participants in the evaluation indicated that Supervisory Board meetings are held in an appropriate place with a sufficient number of directors in attendance. The directors also noted the role of modern technologies in preparing materials.

- The Supervisory Board’s practices in monitoring the work of the chairman and members of the Executive Board and assessing their activities were universally recognized.
- The Supervisory Board’s practices in monitoring operations and financial results, approving crucial policies and procedures of the Group, and ensuring compliance with them were highly appreciated.
- The deep involvement and active participation of independent directors in meetings of the Supervisory Board, as well as their knowledge and preparedness, were confirmed.
- Regular meetings with the Group’s independent auditor were confirmed. Audit reports are duly reviewed to ensure the reliability of the Group’s financial statements and their timely submission to regulators.
- Compliance of the members of the Supervisory Board with the Privacy Policy was recognized unanimously.
- The work of the chairman of the Supervisory Board was commended.

The following tasks for improving the quality of corporate governance were identified during the self-evaluation:
- expand the consideration of issues related to fostering a corporate culture and ensuring compliance with the ethical principles of the Group;
- raise directors’ awareness of improvements in their colleagues’ skills, and improve directors’ knowledge and awareness of the Group’s activities;
- promote interaction between directors and mid-level executives;
- improve procedures for holding board and committee meetings.

Remuneration of executives at Moscow Exchange

The main elements of remuneration paid to the members of the Executive Board in 2021 are:
- a guaranteed component (salary);

Composition of the Executive Board as of 31 December 2021

<table>
<thead>
<tr>
<th>No.</th>
<th>Full name</th>
<th>Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Yury Denisov</td>
<td>Chairman of the Executive Board</td>
</tr>
<tr>
<td>2</td>
<td>Andrey Burtlov</td>
<td>Executive member – Chief Information Officer</td>
</tr>
<tr>
<td>3</td>
<td>Maxim Lapin⁵</td>
<td>Executive member – Chief Financial Officer</td>
</tr>
<tr>
<td>4</td>
<td>Igor Marich</td>
<td>Executive member – Managing Director for Sales and Business Development</td>
</tr>
<tr>
<td>5</td>
<td>Dmitry Shcheglov</td>
<td>Executive member – Chief Operating Officer</td>
</tr>
</tbody>
</table>

Remuneration and compensation paid to the members of the Executive Board in 2021, RUB thousand

<table>
<thead>
<tr>
<th>Type of payment</th>
<th>Amount of payment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Remuneration payable separately for participation in the governing body’s activities</td>
<td>0</td>
</tr>
<tr>
<td>Salary</td>
<td>145,779</td>
</tr>
<tr>
<td>Bonuses</td>
<td>148,672</td>
</tr>
<tr>
<td>Commission fees</td>
<td>0</td>
</tr>
<tr>
<td>Remuneration for participation in the governing body of a subsidiary⁵</td>
<td>–</td>
</tr>
<tr>
<td>Compensation of expenses</td>
<td>0</td>
</tr>
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<td>Other types of remuneration</td>
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- the risk appetite indicators and thresholds for 2021;
- the new edition of the Methods for Determining Risk Appetite Benchmarks;
- the Internal Audit Development Strategy;
- the Regulation on the Principles and Parameters of the Long-term Incentive Program Based on Shares;
- the new edition of the Information Policy.

⁵ Left the post on 17 December 2021.

⁶ Members of the executive bodies of Moscow Exchange are not paid remuneration for their work on the governing bodies of other companies of the Group.

Remuneration and compensation paid to the members of the Executive Board in 2021, RUB thousand

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<tr>
<th>No.</th>
<th>Full name</th>
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</tr>
<tr>
<td>Salary</td>
<td>145,779</td>
</tr>
<tr>
<td>Bonuses</td>
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</tr>
<tr>
<td>Commission fees</td>
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</tr>
<tr>
<td>Remuneration for participation in the governing body of a subsidiary⁵</td>
<td>–</td>
</tr>
<tr>
<td>Compensation of expenses</td>
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Reliability of information on issuers

Moscow Exchange’s stance is consistent with international practice regarding the public disclosure of information by listed companies, financial, production, and ESG data; and changes that may affect share prices.

See the subsection “Responsible investing and sustainable growth” for details on requirements for issuers to disclose information that could affect the share value.

In 2021, Moscow Exchange updated its Listing Rules, which define the conditions and procedures for placement on the financial platform, the rules for delisting various types of securities, and other important details. According to this document, the inclusion of securities on the quotation list is subject to the following requirements:

- portfolio of the securities with the current legislation of the Russian Federation, including regulatory acts of the Central Bank of Russia;
- assumption by the issuer of the obligation to disclose information in accordance with the requirements of the Law on the Securities Market and other legal acts of the Russian Federation, including regulations of the Central Bank of Russia.

Moscow Exchange conducts a review of securities for which applications have been submitted, checking issuers’ compliance against Moscow Exchange’s listing requirements. When preparing an expert opinion, the Listing Department considers official documents received by Moscow Exchange, information disclosed or submitted by the issuer, and messages posted on the websites of relevant (regulatory) government authorities and organizations (self-regulated organizations, settlement depository, ratings agencies, organizations specializing in expert review of environmental and social projects, etc.). It may also consider information from the media and other sources.

Moscow Exchange monitors the compliance of market participants’ activities with the listing requirements. Should a violation of these requirements be detected, Moscow Exchange reserves the right to set a deadline to rectify it or to delist the securities.

NCC is guided by the Rules of Clearing on the stock market, the deposit market, and the loan market.

In 2021, the Central Bank of Russia published an information letter containing recommendations on disclosure by public joint-stock companies of non-financial information about their activities: companies are recommended to voluntarily disclose information on sustainability and ESG factors—including corporate governance—as well as environmental and social performance. Moscow Exchange supports the initiatives of the Central Bank of Russia.

Compliance system

Compliance is a crucial aspect of good corporate governance. The Group has built a compliance management system with developed business processes, procedures, corporate policies, and local regulations; risk assessments are carried out regularly (at least once a year) in all compliance areas.

The development of a corporate compliance culture and a unified approach to compliance risk management became an important area of corporate governance in 2021.

In 2021, Moscow Exchange was one of the first organizations in Russia to successfully pass an independent audit and receive a certificate confirming compliance of its corporate compliance system with ISO 37301:2021 Compliance Management System. The audit covered the following areas:

- anti-corruption;
- countering the legalization (laundering) of the proceeds of crime and the financing of terrorism;
- countering the misuse of inside information and market manipulation;
- settlement of conflicts of interest;
- exerting internal control over organized trading and activities of a financial platform operator;
- monitoring compliance with the tax legislation, including international legislation (CRS, FATCA), and with economic restrictions.

The compliance activities of Moscow Exchange Group are organized into two areas: internal and external:

- internal compliance involves ensuring that the activities of the Group’s companies comply with mandatory and voluntary requirements;
- external compliance consists of two aspects: 1) formalization of compliance requirements for issuers and bidders, and 2) informing market participants of best practices.

External compliance activities

In 2021, the Group implemented projects and held events for financial market participants in order to improve the quality of compliance with regulations and risk assessments.

- Under a joint initiative, the Central Bank of Russia, SRO, and Moscow Exchange Group developed a Code of Good Conduct for participants in trading and clearing by the Group. The draft document was discussed with traders. A mechanism for accepting the code and a communications channel for receiving and reviewing reports (the internal “SpeakUp” intranet portal and compliance hotline) were created.
- The conference Compliance: Biggest Trends of 2021 was held for market participants. Trends and modern compliance techniques—designed to improve the quality of regulatory risk management—were reviewed at the event.
- Together with Deloitte, Moscow Exchange conducted and published the study AML/CFT Survey of Market Participants. The aim of the project was to identify major problems in developing the AML/CFT function in financial institutions. Issues covered include the organization of the AML/CFT function, proper client verification, compliance with sanctions requirements, transaction monitoring and reporting, and more.
- A case study competition on business ethics, compliance, and sustainability was organized, with Moscow Exchange acting as sponsor. Participants were asked to describe a real-life situation involving decision-making amid an ethical and managerial dilemma. The winning cases may be used by universities in their management and economics programs, as well as by companies in training their staff.
- The compilation Typology of Unfair Practices in the Securities Market was prepared in conjunction with NAUFOR. The compilation contains descriptions of unfair and illegal actions when performing transactions involving financial instruments, and mechanisms designed to identify them.

The Group’s compliance practices

In accordance with the “Three Lines of Defense” model, the Supervisory Board of Moscow Exchange approves the Code of Professional Ethics, reviews reports, and assists in developing the ethics function. The managing director for compliance and business ethics is responsible for ethics and compliance-related issues; he/she is directly subordinate to the chairman of the Executive Board of Moscow Exchange.

The leader of the compliance function may take part in meetings of Moscow Exchange’s management bodies and committees, in risk assessments of new processes and products, and in procurement procedures.

A self-assessment of Moscow Exchange’s compliance system is carried out twice a year; external audits are carried out as part of the annual audit.

Failure by employees to comply with the Code of Professional Ethics and to complete mandatory compliance training affects the results of their annual evaluation.

The Group adheres to the open-door principle: employees are always welcome to ask for clarification, submit questions, or report violations. Moscow Exchange has developed an initiative to designate active employees who are interested in self-development and refinement of the Company’s compliance procedures ‘Compliance Ambassadors’. They attend training sessions on topics related to compliance culture, and their initiatives in the field of compliance and ethical behavior are reviewed and may be accepted.

The Group has designed technological solutions, including a communications channel (the anonymous SpeakUp! hotline—Moscow Exchange own creation) that can be used to report possible instances of corruption or violations of ethical business conduct and law. All employees are welcome to submit anonymous reports via the hotline and receive a response (applicants are sent a link to a web page where they can check the reaction of the Group’s companies). Moscow Exchange Group adheres to the principle of non-retaliation against employees who report problems.

In addition to the internal channel for employees, the Group has set up an external one for reports of corruption-related issues. Interested parties are welcome to use the hotline on the Moscow Exchange website. The number of reports received is reflected in the regular Sustainability Reports. NSD also runs a compliance hotline similar to SpeakUp which complements the latter.

1 The compliance system is designed for monitoring and managing risks of non-compliance with legislation; regulatory acts; principles of voluntary industry associations, and corporate policies and regulations. It also covers compliance with corporate ethics, anti-corruption measures, human rights, and other aspects of corporate conduct.

2 The certificate is valid until 2024.

In 2021, the companies of the Group monitor the effectiveness of and control over anti-corruption procedures. Self-assessments of the quality of corruption risk management are carried out regularly: reports are compiled for the Executive Board and the Audit Committee under the Supervisory Board of Moscow Exchange. Corruption risk assessments are conducted at all of the Group’s companies. In 2021, no incidents of corruption or violations of the Code of Professional Ethics were registered. No significant corruption risks were identified, either.

205-2

Training and raising awareness of anti-corruption policies and methods, as well as the Code of Professional Ethics

<table>
<thead>
<tr>
<th>Moscow Exchange</th>
<th>NCC</th>
<th>NSD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Raising awareness of existing anti-corruption policies and methods, as well as the Code of Professional Ethics, %</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Employees</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Business partners</td>
<td>100 (anti-corruption clauses are included in contracts with business partners)</td>
<td></td>
</tr>
<tr>
<td>Training in anti-corruption policies and methods, including matters related to business gifts and conflicts of interest, number/%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employees</td>
<td>1,030/101</td>
<td>190/85</td>
</tr>
<tr>
<td>Senior executives (members of the Executive Board)</td>
<td>2/50</td>
<td>3/100</td>
</tr>
<tr>
<td>Leaders of functional departments</td>
<td>156/60</td>
<td>70/117</td>
</tr>
<tr>
<td>Specialists</td>
<td>1,630/101</td>
<td>190/85</td>
</tr>
</tbody>
</table>

All employees are required to read and accept the anti-corruption rules (through the electronic document management system, by affixing an electronic signature). Their awareness of the topic is then maintained through mandatory training sessions and briefings, as well as during events organized for the annual Compliance Day. Training is also provided on sanctions-related issues and compliance with tax legislation in regards to money laundering, countering terrorism, and other elements of compliance.

A range of training methods is used to keep personnel informed, including tests of varying complexity, depending on the employee’s position and level, newsletters reminding employees of corporate rules and tools (including the hotline), and relevant news.

In 2021, a training course and an interactive film covering anti-corruption issues were created. The Group aims to raise awareness of the need for training in anti-corruption policies and methods by increasing the share of employees who have undergone training.

Approach to taxation

The Group’s tax strategy was developed in 2021 and approved in 2022. The strategy sets out the Group’s approach to taxation. Also in 2021, a number of data management measures were taken to automate inspections and tax payments.

See the section “Sustainability Approaches and Procedures” for detailed information on taxation issues.

1 For procurements in excess of RUB 800,000. Suppliers that have entered into contracts for lesser amounts can study the publicly available Anti-corruption Policy themselves.

2 The number of specialists who underwent training in anti-corruption policies and techniques includes Moscow Exchange employees who left the company in 2021.

3 The number of specialists who underwent training in anti-corruption policies and techniques includes Moscow Exchange employees who left the company in 2021.

4 Data for Moscow Exchange and NCC.

5 The document was reviewed by the Executive Board and approved by the Supervisory Board in March 2021.

6 Data for Moscow Exchange and NCC.
Interaction with suppliers

The Group’s companies have transparent conditions for suppliers and contractors who wish to participate in the procurement process through bids and transactions. Guided by internal regulations such as the regulations on procurement, the Group’s companies guarantee the fulfillment of their contractual obligations.

The development of the Supplier/Counterparty Code of Business Conduct for the companies of Moscow Exchange Group began in 2021 in a bid to improve the business environment and reduce risks in the supply chain. It sets out principles of responsible business conduct which Moscow Exchange expects counterparties to comply with and which are to be taken into account when making procurements. The code is to be adopted in 2022.

Also in 2021, blocking criteria for evaluating counterparties in the main procurement areas were standardized in order to minimize the risk of conflicts of interest. In accordance with the updated Regulation on Procurement, Moscow Exchange tightened financial risk control over suppliers (in particular, subcontractor checks were introduced).

Structure of the Group’s procurements in 2021 by area, %

<table>
<thead>
<tr>
<th>Area</th>
<th>Share</th>
</tr>
</thead>
<tbody>
<tr>
<td>Procurements, total</td>
<td>100%</td>
</tr>
<tr>
<td>IT</td>
<td>85%</td>
</tr>
<tr>
<td>Administrative</td>
<td>8%</td>
</tr>
<tr>
<td>Consulting and insurance services</td>
<td>4%</td>
</tr>
<tr>
<td>Marketing and PR, including:</td>
<td>2%</td>
</tr>
<tr>
<td>Security</td>
<td>1%</td>
</tr>
<tr>
<td>HR</td>
<td>0.12%</td>
</tr>
</tbody>
</table>

In 2021, contracts worth RUB 6.9 billion were concluded for the supply of products and services, RUB 3.3 billion of which was for goods and RUB 3.6 billion of which was for services. The total number of suppliers exceeded 240 organizations (up from 220 in 2020); 98.3% of all procurements were from Russian suppliers.

Plans for 2022

The following corporate governance tasks have been set for 2022:
- conduct an independent assessment of the Supervisory Board’s effectiveness;
- determine a pool of successors for the members of the Supervisory Board;
- formalize the Group’s management system.

To expand the scope of work and assist employees in the area of compliance, the Group’s companies have set the following objectives:
- implement initiatives in accordance with the Compliance Roadmap;
- take measures to develop risk and compliance culture.

To implement ESG principles throughout the supply chain, Moscow Exchange Group is planning to take the following actions:
- approve the Supplier Code of Business Conduct and introduce a procedure for signing a document (or a form) confirming that counterparties are familiar with Moscow Exchange’s requirements;
- continue improving the planning, consolidation, and automation of procurement procedures for Moscow Exchange Group.

The Group’s plans for 2021 and the coming years in the areas of internal audit, business ethics, and anti-corruption include continuous work on the Compliance Roadmap, which envisages improving procedures and automating compliance-related risk management processes.

For data from 2019, 2020 and 2021, see the subsection “Trusted and resilient market infrastructure” of the section “Sustainability Approaches and Procedures”.

TRUSTED AND RESILIENT MARKET INFRASTRUCTURE

For data from 2019, 2020 and 2021, see the subsection “Trusted and resilient market infrastructure” of the section “Sustainability Data”. For the key policies, procedures, and responsible departments, see the subsection “Trusted and resilient market infrastructure” of the section “Sustainability Approaches and Procedures”.

This subsection describes measures that Moscow Exchange Group takes to ensure business continuity, including the reliability of information, data confidentiality, availability of operations, and information security.

Moscow Exchange Group’s objectives and the UN Sustainable Development Goals

- SDG 9.b Ensure sustainable financial infrastructure

Russian suppliers are considered local suppliers for the Group.

Market infrastructure means payment systems, central security depositories, security settlement systems, and central counterparty and trade repositories.

2021 highlights

Risk management

The overall risk management system aims to guarantee reliable infrastructure. Since 2021, Moscow Exchange Group has been implementing the 2021–2024 Risk Management System Development Strategy and Roadmap, which sets out key performance indicators, risks, and preventive actions, including those specifically aimed at information security risks.

The Group’s progress towards achieving the goals and objectives established in the strategy is monitored regularly: status reports are submitted to collegial executive bodies for review. We also use KPIs to assess the effectiveness of the risk management system.

As part of the Strategy and Roadmap, Moscow Exchange has implemented an approach to determining its risk appetite. The component risks’ carry equal weight and are deemed to be material for the Group and all its companies.

ESG risk management

The expectations and interests of the Group’s stakeholders align with Moscow Exchange Group’s high level of preparedness for new ESG risks and opportunities. Approaches to identifying and prioritizing priorities and opportunities are determined based on the company’s strategic goals and objectives.

By analyzing key sustainability trends, risks, and opportunities at an early stage, the company can enhance its strategic performance. Prioritizing key economic, environmental and social issues as risks and opportunities is an integral part of Moscow Exchange Group’s operations and internal processes.

In the reporting year, Moscow Exchange Group achieved all its goals and objectives. This lays a solid foundation to further develop the risk and opportunity assessment process with respect to sustainability.

Climate-related risk management

In 2021, Moscow Exchange began assessing climate-related risks and opportunities in line with TCFD recommendations. To develop its tools for managing climate-related risk and opportunities, Moscow Exchange plans to achieve the following:

- assess climate-related risks and opportunities;
- include climate-related risks in the risk map for further monitoring;
- train staff to predict probable events and threats.

The short-term horizon (12 months) includes an annual review of transition and physical climate risks, as well as regular monitoring of the conditions and rules for identifying them. Moscow Exchange incorporates international practices for identifying and assessing climate-related risks into its operations.

The following climate-related risks were identified in the reporting period:

- transition risks, including market, reputational, political, legal, and technological risks;
- physical risks (acute and chronic).

Moscow Exchange Group is expanding its partnerships with various institutions in order to disseminate knowledge and expertise. It is developing models for identifying and assessing climate-related risks. More information on TCFD initiatives can be found in the subsection “Climate agenda”.

Data governance activities implemented:

- an operational data quality management model to minimize risks (reputational, regulatory, operational) and improve business users’ satisfaction with data services was launched;
- the target operating model for evolving data monetization tasks was approved;
- the DataOps business line was launched, and a data depersonalization platform and practices were introduced, accelerating the production of data platforms and services thanks to external teams;
- the MLOps platform was launched to reduce T2M tasks in implementing AI/ML solutions;
- data lifecycle management principles were formulated to optimize TSE and improve data efficiency.

Information security

Moscow Exchange Group is implementing the 2021–2024 Information Security Development Strategy. The strategy contains measures for mitigating the likelihood of actual IT threats, as well as key metrics for assessing the effectiveness of the measures taken.

The Group’s companies have electronic and computer crime and personal liability insurance policies to mitigate operational and information security risks.

Robust IT infrastructure

The Group’s computing facilities are in two state-of-the-art data centers (DC): DataSpace (main, Tier III compliant) and M1 (standby). In 2019, Moscow Exchange replaced the network technology stack in both the data centers and its office buildings, introduced a separate type of colocation zone network connection for high-speed FIFO links, and revised how it organizes fiber-optic links between points of presence to ensure higher data replication speeds.

In 2021, Moscow Exchange replaced its equipment with advanced and powerful virtualization stacks with a higher energy efficiency class for dedicated virtual and utility resources. It also purchased new networking equipment for its office on Spartakovskaya Street.

In July 2021, the Group launched the DevOps production and development platform, including various streamers and services. Over the year, most development pipelines were successfully unified, the target approach for CI/CD processes on Moscow Exchange was approved, and the MVP development portal was launched. These activities have resulted in simplified and unified IT processes, a stronger engineering culture, and improved reliability and stability of products developed.

Access to products and services

Moscow Exchange provides equal, user-friendly access to its products for all types of investors and market participants.

In 2021, Moscow Exchange completed the process of connecting participants, providing a more efficient and user-friendly experience via dedicated communications channels:

- personal accounts for prospective clients were created; prospective clients can now access Moscow Exchange and NCC services;
- various directory checks and reporting functions have been automated;
- in a trading and clearing member’s personal account client questionnaires are now pre-filled with information from the Unified State Register of Legal Entities.

Thanks to these innovations, clients now have a convenient and transparent tool that makes accessing Moscow Exchange’s services quick and easy.

In 2022, work will continue on developing prospective clients’ personal accounts. Clients will be able to sign contracts and submit applications via a single interface, which will vastly improve the client onboarding process.

Finuslugi.ru

The Group continues to develop the Finuslugi.ru personal finance platform by adding new financial service providers and expanding the product range. In the future, OFZ-N federal loan bonds, and other products from banks, asset managers, and insurance companies will become available on the platform.

In 2021, the following significant updates were made to Finuslugi.ru:

- the opening of recurring deposits was introduced;
- comprehensive vehicle insurance can now be purchased;
- consumer loans are now available;
- mortgage insurance can now be purchased;
- Bonds of the Russian regions are now available; these can be purchased exclusively through Finuslugi.ru, without opening a brokerage account;
- a new multi-product site was launched;
- instant top-up of wallets and deposits.

...
In 2021, following milestones were achieved:
- the list of registered products was expanded;
- the bonds on the Marketplace project was implemented; and
- the first issuer was the Government Administration of the Kaliningrad Region.

Access to transactions with subfederal loan bonds
In December 2021, the Finuslugi.ru platform launched the first service for purchasing and selling subfederal loan bonds of constituent entities of the Russian Federation. Russian regions’ guaranteed-income securities will only be traded on Moscow Exchange, and no brokerage account will be required to purchase them.

Not only are bonds a tool for improving the financial literacy of the public, they also facilitate ESG projects: funds raised will be used to clean up bodies of water, reclaim landfill sites, and implement urban redevelopment projects.

The Kaliningrad Region’s coupon bonds are available for purchase. The coupon rate is 9% per annum, with a minimum investment amount of RUB 1,000. All the funds raised will be put towards development and improvement of the Kaliningrad Region. Investors will be able to choose a project to invest in, and they will receive a quarterly report on its implementation. Information on implementation of the project will be provided by the Kaliningrad Region.

Consumer lending service
In 2021, the Finuslugi.ru platform of Moscow Exchange launched a consumer lending service. Now, users of Finuslugi.ru can choose loans and other services offered by various banks directly in their personal accounts, as well as access to the Transit 2.0 system, which is an advanced platform used by banks and corporations to exchange financial messages and electronic documents. The solution is based on NSD’s Electronic Data Interchange (EDI) system. In 2021, it connected 14 banks and 26 corporations.

In 2021, MOEX Treasury started developing digital financial assets in accordance with the legislation; a customer engagement initiative was also implemented which expanded the number of corporate clients relative to capital markets.

In the reporting period, Moscow Exchange acquired the OTC FX platform, NTPro. The platform offers its clients liquidity aggregation, matching and execution services across a wide range of currency instruments, and services for the trading to more than 60 providers of foreign currency liquidity. The average daily turnover of the NTPro platform in 2021 was about USD 7.5 billion. NTPro technologies expand its range of opportunities for clients of both companies, presenting them with flexible and modern NTPro trading solutions for FX transactions in conjunction with the clearing and settlement services of Moscow Exchange.

Extension of the trading time
In June 2020, in addition to the main trading session, Moscow Exchange launched an evening trading session that lasts from 7:00 p.m. to 11:50 p.m. for the MOEX Equity Market, increasing the total daily trading time on the Equity Market by almost five hours.

In March 2021, Moscow Exchange launched a morning trading session for the FX and Derivatives Markets which starts at 7:00 a.m. The total daily trading time increased by three hours: from 14 to 17 hours. The evening and morning sessions have improved the accessibility of the Russian financial market to all groups of investors and laid the groundwork for attracting new investors.

Extension of the trading period for the FX and Derivatives Markets makes exchange services more accessible to clients from Russia’s Far East and Asian countries.

Foreign shares
Moscow Exchange lists highly reliable issuers.

In 2020, Moscow Exchange Group successfully launched trading for 55 highly liquid stocks of leading international companies. In 2021, the list of available securities was expanded each month—a total of 466 stocks and depositary receipts of well-known major companies from various countries were admitted. As of the end of 2021, a total of 521 foreign stocks and depositary receipts were added. A total of 49 new corporate Eurobonds were added. The total number of listed Eurobonds reached 115 issues. The average daily trading volume with Eurobonds in 2021 exceeded RUB 1 billion, which is 24% more than in 2020.

In 2021, trading in foreign shares was up 744% compared to 2020, amounting to RUB 726 billion.

New IT services and upgrades to trading technologies
Rapid data access and trading technologies
Moscow Exchange Group provides a robust environment where equity market participants can analyze the market and make transactions.

Trading technology upgrades
SIMBA high-speed information distribution protocol
In October 2021, SIMBA, a new high-speed information distribution protocol for the Derivatives Market, was launched. The service allows clients to receive market signals faster. The service’s high speed is delivered by new software interaction between the SIMBA gateway and the central component of the trading system, along with the high-speed segment of the network infrastructure, which is designed specifically to transmit huge amounts of data to multiple recipients in real time.

TWAP
In keeping with global FX Market trends, Moscow Exchange Group launched the TWAP algorithm1, which enables market participants to assess the execution of their orders, comparing the price at which the order was executed at each time interval with the average price of transactions in the given period, and evenly convert a given volume over a predetermined period of time.

The TWAP algorithm helps traders avoid market impact, fight potential front-running2, automate their work, and minimize operational risk. The service promotes compliance with ethical trading rules and mitigates the risk of fraud.

Spectra
The Spectra platform supports trading in futures within a negative price range and in options on such futures. A second-option pricing model and a model switch mechanism have also been introduced.

Trading access protocol for the Equity, Bond, and FX Markets
Banks, brokers, algo-traders, and HFT-traders who place their hardware in MOEX’s data center can now use the FIFo MFIX Trade service to connect to the Equity, Bond, and FX Markets.

The interface operates a first in, first out (FIFO) algorithm that is strictly applied to process orders at the exchange gateway with more than 99% probability. This substantially improves the transparency and predictability of Moscow Exchange’s IT infrastructure operations.

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1 TWAP (Time-Weighted Average Price) is an algorithmic trading strategy aimed at keeping the average entire price close to the weighted average price of a security over a certain period of time specified by the user.
2 Front-running is an unethical practice of making a profit by dealing in securities that will soon be bought or sold by an organization.
In its operations, Moscow Exchange Group adheres closely to the ESG principles, including responsible investment principles by encouraging listed companies and traders to abide by ESG principles as well. The Group shares the environmental concerns of its stakeholders, and it strives to make a difference by minimizing any negative impact on the environment.

The primary environmental impact of the Group’s companies stems from electricity consumption associated with the operation of server and computer equipment processing a significant amount of data (the data centers account for about 36% of Moscow Exchange’s total electricity consumption). Generation of the electricity consumed by the Group’s companies generates GHG emissions that can affect the climate. Therefore, the management of Moscow Exchange Group incorporates climate risks into its risk management system and keeps track of GHG emissions. See the subsection “Climate agenda” for details.

Other environmental impacts, including water consumption and waste generation, are mainly associated with the operation of Moscow Exchange’s offices. This subsection presents measures taken to ensure sustainable water use and waste management; metrics and their values are provided in the subsection “Resource efficiency and environmental impact” of the section “Sustainability Data”. Methods for managing environmental issues are described in the section “Sustainability Approaches and Procedures”.

### Plans for 2022

In 2022, Moscow Exchange plans to:
- review and revise the current strategy;
- review the supply chain and import substitution;
- adapt the technological landscape and infrastructure to the revised strategy;
- introduce new risk management tools, including systems that incorporate machine learning and scenario analysis;
- train staff on anticipating probable events and threats;
- analyze financial and non-financial risks integrated in the risk map;
- arrange external quality assessment of the risk management system;
- audit information security in accordance with ISO 27001 and ISO 22301.

### Moscow Exchange Group’s objectives and the UN Sustainable Development Goals

- SDG 12.2, 12.4, 12.5, 12.6, 12.8 Responsible consumption and production
- SDG 13.1, 13.3 Climate action
2021 highlights

The Group aims to improve the efficiency of its energy and water consumption, reduce waste generation, and increase the amount of waste recycled. To achieve its objectives, the Group sets an annual goal of adhering to a zero increase in the rates of energy use, GHG emissions, water consumption, and waste generation.

2021 performance highlights¹:

- energy intensity per revenue decreased by 3.3% compared to 2020; data center energy consumption per revenue decreased by 7.3%;
- GHG emission intensity per revenue dropped by 19% compared to 2020;
- water consumption intensity per revenue dropped by 20% compared to 2020;
- waste generation intensity per revenue remained at the same level as 2020.

Energy consumption

The Group has continual measures in place to optimize electricity and heat consumption, including the following:

- switching server processors to energy-saving mode when not under load;
- turning off office lighting and climate control equipment outside office hours;
- replacing light fixtures with energy-saving LED lamps when building or renovating premises.

In 2021, Moscow Exchange Group transferred all its office buildings on Bolshoy Kislovsky Lane and Spartakovskaya Street in Moscow to green electricity produced at Ulyanovsk Wind Farm–2. Over the year, Moscow Exchange developed a contractual arrangement that allows end consumers of electricity to purchase power from renewable sources through a commission agreement with a guaranteeing supplier (Mosenergosbyt JSC in the case of Moscow Exchange) on the wholesale electricity and capacity market. This model is unique in Russia.

In early 2022, the Group signed another commission contract for the supply of green energy to the DataSpace data processing center, where Moscow Exchange’s hardware and software systems are located. In 2022, the planned supply will exceed 15.8 million kWh, or more than 90% of Moscow Exchange’s electricity consumption. The use of clean and renewable energy will allow Moscow Exchange to minimize its carbon footprint in line with best practices in sustainability.

In the near future, Moscow Exchange plans to reduce its overall electricity consumption by switching to more energy-efficient network equipment.

Use of green energy will help prevent GHG emissions and reduce Scope 2 indicators.

Water consumption

Water consumption in 2021 was affected by the global pandemic and the ensuing waves of COVID-19. Due to periodic deterioration of the epidemiological situation, most employees worked remotely, which affected the levels of energy and water consumption at our office and other premises (such as the fitness club). Compared to 2020, total water consumption increased slightly, while the specific water consumption per employee in 2020–2021 remained stable.

Waste management

Waste generated by the Group’s companies mainly consists of solid non-industrial waste and e-waste (see the section “Sustainability Approaches and Procedures” for more information).

In 2021, the amount of waste generated increased by 22.1%, mainly due to an increase in low-hazard waste (Hazard Class IV). In accordance with the law and the Waste Generation Standards and Waste Disposal Limits, all generated waste is transferred to specialized contractors (including 95% of waste for disposal).

The Group’s companies have organized separate collection of non-industrial waste and waste paper for recycling.

Plans for 2022

According to the Sustainability Roadmap, the Group’s plans include the following:

- develop the climate risk management system of the Group and improve communication with financial market participants regarding the climate agenda;
- implement annual energy efficiency measures;
- implement annual measures for waste management and sustainable water use;
- hold environmental campaigns about collecting certain types of waste.

¹ Targets for 2021 are based on 2019 performance, as 2020 performance is not comparable due to changes in operations on account of the COVID-19 pandemic.
OVERVIEW OF THE COVID-19 RESPONSE

In 2021, the intensity of the COVID-19 pandemic varied as new strains of the virus emerged. Accordingly, Moscow Exchange Group continued to adapt to the COVID-19 pandemic, promptly implementing appropriate measures to contend with the situation. The Group complied with decrees issued by the mayor of Moscow and the head of Russian consumer protection agency Rospotrebnadzor, which were aimed at slowing the spread of infection.

ENSURING PROCESS CONTINUITY

During the reporting year, more than 70% of the Group’s employees worked remotely; staff whose presence in the office was essential worked under a hybrid format. Most corporate events were held online, including meetings, training sessions, meetups, town halls, festive events, and others.

The Group’s experience maintaining business-process continuity in 2020 through hybrid work arrangements served as the basis for strengthening work processes under the new format and allowed the Group to continue operating effectively. In 2021, Moscow Exchange introduced internal reporting measures for implementing the “pandemic” scenario in the business-continuity management system and for collecting statistics on the incidence rate of the disease among staff.

SUPPORT FOR THE GROUP’S EMPLOYEES

Protecting employee health

The Group rigorously adhered to health and safety rules at all its premises, including social distancing requirements, and also implemented the following measures:
- regularly disinfected premises (it introduced stricter requirements on office cleaning and sanitization in 2021);
- made mask-wearing mandatory;
- monitored employees’ health;
- introduced PCR and antibody testing at Moscow Exchange offices (for employees who needed to work from the office);
- actively cooperated with medical clinics and doctors on vaccination issues.

Prevention and communication

In order to combat the pandemic and keep employees informed about issues related to COVID-19 and vaccination, in 2021 the Group organized webinars with Sergey Tsarenko, Head of Intensive Care at City Clinical Hospital No. 52. Sergey is a renowned Russian intensive care specialist and professor. Webinars were also held with Olga Zamyatina, Head of the Therapeutic Department of the MEDSI Clinical and Diagnostic Center; Olga is a general practitioner, endocrinologist, and Candidate of Medical Sciences.

The Group’s intranet has a page containing current COVID-19 prevention recommendations for staff. It also sends out regular newsletters.

Vaccination Days were held at Moscow Exchange offices, and all employees of the Group were given the opportunity to be vaccinated.

Thanks to these measures, the Group did not experience a confirmed large-scale outbreak of COVID-19 among its employees in 2021.

PROTECTING THE GROUP’S INFRASTRUCTURE

In the course of 2021, there were no significant disruptions to Moscow Exchange’s operations: information systems remained stable and available to clients. Measures were taken to protect traders and customers.

Support for issuers

During the reporting period, the Group continued to waive listing fees for small and medium-sized businesses placing bonds of up to RUB 400 million. It will continue this practice until the end of the year. The measure is aimed at supporting clients experiencing difficulties associated with the financial and organizational burden brought about by COVID-19.

MOSCOW EXCHANGE IN ESG INDICES AND RATINGS

Moscow Exchange is listed on leading Russian and global ESG indices and ratings that assess ESG risks, corporate governance, and management of environmental and social issues. It receives regularly high rankings and intends to further improve its position as it implements its ESG strategy².

INDICES
- MSCI Europe and Middle East ESG Leaders Index
- FTSE4Good Emerging Index
- MOEX-RSPP Sustainability Vector Index (starting January 2021)
- MOEX-RSPP Responsibility and Transparency Index (starting January 2021)

RATINGS AND RANKINGS
- BBB on the MSCI ESG rating, position retained
- 19/155 on RAEX-Europe’s ESG Ranking of Russian Companies
- 1/155 on RAEX-Europe’s ESG Ranking of Russian Companies: Governance
- 1.85 points on Expert RA’s ESG Transparency Rating of Russian Companies³
- 22.3 points and 208th place out of 912 companies on Sustainalytics³ Diversified Financials Ranking

1 Meetups are informal meetings dedicated to discussing work issues and exchanging experience. Town halls are business meetings.
2 The rankings and ratings that follow are provided as of 31 December 2021, unless stated otherwise.
3 As of November 2021.
4 As of 1 June 2022.
MOEX Group’s focus areas: ‘GREAT’ ........................................ 72
- Genuine partnership and engagement with the community ........ 72
- Responsible investing and sustainable growth .................... 74
- Environment of respect and empowerment ....................... 76
- Advanced governance and responsible business practices .... 82
- Trusted and resilient market infrastructure ...................... 85
- Resource efficiency and environmental impact .................. 86
MOEX GROUP’S FOCUS AREAS: ‘GREAT’

GENUINE PARTNERSHIP AND ENGAGEMENT WITH THE COMMUNITY

Engagement and training

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of unique individual customers</td>
<td>million people</td>
<td>3.9</td>
<td>8.8</td>
<td>16.8</td>
<td>1</td>
</tr>
</tbody>
</table>

Number of students participating in Moscow Exchange School for individual investors | thousand people | >74  | >80  | >164 | 1                   |
Number of people who took part in financial literacy improvement activities | thousand people | >90  | >100 | >100 | 1                   |
Number of participants in the student conference MOEX Progress: Development of the Russian Financial Market | people  | 30   | 35   | 35   | 2                   |
Number of participants in professional forums and conferences organized by Moscow Exchange | thousand people | >4   | >100 | >140 | 2                   |

Charity

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of employees who took part in financial literacy improvement activities organized by Moscow Exchange</td>
<td>people</td>
<td>-</td>
<td>-</td>
<td>17</td>
<td>1</td>
</tr>
<tr>
<td>Funds allocated for charity projects, total</td>
<td>RUB million</td>
<td>24.2</td>
<td>113.2</td>
<td>34.9</td>
<td>1</td>
</tr>
<tr>
<td>Science, education and improvement of the financial literacy of the public</td>
<td>RUB million</td>
<td>10.4</td>
<td>9.5</td>
<td>19.1</td>
<td>1</td>
</tr>
<tr>
<td>Support for veterans</td>
<td>RUB million</td>
<td>4.2</td>
<td>5.3</td>
<td>3.2</td>
<td>1</td>
</tr>
<tr>
<td>Healthcare, rehabilitation, and care for people with disabilities or COVID-19</td>
<td>RUB million</td>
<td>8.4</td>
<td>97.9</td>
<td>10.5</td>
<td>1</td>
</tr>
</tbody>
</table>

Sponsorship

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funds allocated for sponsorship, total</td>
<td>RUB million</td>
<td>95.0</td>
<td>47.5</td>
<td>57.6</td>
<td>1</td>
</tr>
<tr>
<td>Community engagement</td>
<td>RUB million</td>
<td>86.0</td>
<td>17.4</td>
<td>21</td>
<td>1</td>
</tr>
<tr>
<td>Education and science</td>
<td>RUB million</td>
<td>0.9</td>
<td>22.6</td>
<td>28.5</td>
<td>1</td>
</tr>
<tr>
<td>Sports and healthy lifestyle</td>
<td>RUB million</td>
<td>8.1</td>
<td>7.5</td>
<td>8.1</td>
<td>1</td>
</tr>
</tbody>
</table>

Donations by the organization for political purposes

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funds allocated for political purposes</td>
<td>RUB million</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
</tbody>
</table>

1 The first perimeter corresponds to information pertinent to Moscow Exchange, the NSD, and the NCC; the second perimeter corresponds to information pertinent only to Moscow Exchange.
2 This value has been adjusted since the 2020 Sustainability Report was published.
3 In 2020, RUB 100 million was allocated to combat COVID-19.
4 The “Other” category includes costs allocated to the Development Foundation of the Pushkin State Museum of Fine Arts and for the New Year’s charity event.

5 These people include beneficiaries of all foundations who received support during the fight against COVID-19 in 2020. The decline in the number of beneficiaries in 2021 is explained by the lower amount of charity support allocated to preventing COVID-19.
6 The “Other” category includes beneficiaries who are under the care of charitable foundations and received presents as a result of the New Year’s charity event.
RESPONSIBLE INVESTING AND SUSTAINABLE GROWTH

Key operating indicators

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Market capitalization</td>
<td>RUB billion</td>
<td>245.5</td>
<td>362.5</td>
<td>348</td>
<td>2</td>
</tr>
<tr>
<td>Operating income</td>
<td>RUB billion</td>
<td>43.2</td>
<td>48.6</td>
<td>54.9</td>
<td>1</td>
</tr>
<tr>
<td>Dividend per share</td>
<td>RUB</td>
<td>-7.0</td>
<td>7.93</td>
<td>9.45</td>
<td>1</td>
</tr>
<tr>
<td>Net debt/EBITDA</td>
<td>-</td>
<td>-3.2</td>
<td>-2.95</td>
<td>-2.34</td>
<td>2</td>
</tr>
<tr>
<td>Cost to income ratio</td>
<td>%</td>
<td>35.7</td>
<td>34.5</td>
<td>37.4</td>
<td>1</td>
</tr>
</tbody>
</table>

Market dynamics

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trading volume on all markets</td>
<td>RUB trillion</td>
<td>798.3</td>
<td>947.2</td>
<td>1,009.6</td>
<td>2</td>
</tr>
<tr>
<td>Trading volume on the Equity Market</td>
<td>RUB trillion</td>
<td>12.4</td>
<td>23.9</td>
<td>30.0</td>
<td>2</td>
</tr>
<tr>
<td>Average daily number of transactions on the Equity Market</td>
<td>thousand</td>
<td>514.2</td>
<td>1,293.5</td>
<td>2,141.4</td>
<td>2</td>
</tr>
<tr>
<td>Trading volume on the Derivatives Market</td>
<td>RUB trillion</td>
<td>82.4</td>
<td>129.9</td>
<td>158.0</td>
<td>2</td>
</tr>
<tr>
<td>Average daily number of transactions on the Derivatives Market</td>
<td>thousand</td>
<td>898.3</td>
<td>1,488</td>
<td>1,536</td>
<td>2</td>
</tr>
<tr>
<td>Trading volume on the Bond Market</td>
<td>RUB trillion</td>
<td>28.2</td>
<td>30.6</td>
<td>22.4</td>
<td>2</td>
</tr>
<tr>
<td>Average daily number of transactions on the Bond Market</td>
<td>thousand</td>
<td>21.1</td>
<td>46.5</td>
<td>62.9</td>
<td>2</td>
</tr>
<tr>
<td>Trading volume on the FX Market</td>
<td>RUB trillion</td>
<td>308.3</td>
<td>328.9</td>
<td>319.8</td>
<td>2</td>
</tr>
<tr>
<td>Average daily number of transactions on the FX Market</td>
<td>thousand</td>
<td>72.3</td>
<td>232.5</td>
<td>446.5</td>
<td>2</td>
</tr>
<tr>
<td>Trading volume on the Money Market (excluding repo with GCC)</td>
<td>RUB trillion</td>
<td>346.3</td>
<td>426.8</td>
<td>474.0</td>
<td>2</td>
</tr>
<tr>
<td>Average daily number of transactions on the Money Market</td>
<td>thousand</td>
<td>11.1</td>
<td>33.6</td>
<td>95.8</td>
<td>2</td>
</tr>
<tr>
<td>Share of international investors in the total trading volume on the Equity Market</td>
<td>%</td>
<td>49</td>
<td>46</td>
<td>48</td>
<td>2</td>
</tr>
<tr>
<td>Share of international investors in the total trading volume on the Derivatives Market</td>
<td>%</td>
<td>49</td>
<td>49</td>
<td>48</td>
<td>2</td>
</tr>
<tr>
<td>Share of international investors in the total trading volume on the Bond Market</td>
<td>%</td>
<td>13</td>
<td>16</td>
<td>13</td>
<td>2</td>
</tr>
<tr>
<td>Share of international investors in the total trading volume on the FX Market</td>
<td>%</td>
<td>12</td>
<td>18</td>
<td>16</td>
<td>2</td>
</tr>
<tr>
<td>Share of international investors in the total trading volume on the Money Market</td>
<td>%</td>
<td>13</td>
<td>11</td>
<td>9</td>
<td>2</td>
</tr>
</tbody>
</table>

Sustainable financial instruments

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>SME bond offering volumes in the Growth sector</td>
<td>RUB billion</td>
<td>3.1</td>
<td>6.4</td>
<td>7.9</td>
<td>2</td>
</tr>
<tr>
<td>Number of SME issuers in the Growth sector</td>
<td>number</td>
<td>15</td>
<td>22</td>
<td>28</td>
<td>2</td>
</tr>
<tr>
<td>Secondary trading volumes in the Innovation and Investment Market (IIM)</td>
<td>RUB billion</td>
<td>58.0</td>
<td>280.0</td>
<td>335</td>
<td>2</td>
</tr>
<tr>
<td>Number of securities in the IIM</td>
<td>number</td>
<td>15</td>
<td>24</td>
<td>28</td>
<td>2</td>
</tr>
<tr>
<td>Capital raised in the IIM</td>
<td>RUB billion / USD million</td>
<td>-</td>
<td>17.5</td>
<td>12.5/500</td>
<td>2</td>
</tr>
<tr>
<td>Primary offering volumes in the Sustainability sector</td>
<td>RUB billion</td>
<td>1.9</td>
<td>11.5</td>
<td>169.4</td>
<td>2</td>
</tr>
<tr>
<td>Number of ESG instrument types</td>
<td>number</td>
<td>3</td>
<td>4</td>
<td>10</td>
<td>2</td>
</tr>
<tr>
<td>Number of bond issues in the Sustainability sector</td>
<td>number</td>
<td>6</td>
<td>13</td>
<td>22</td>
<td>2</td>
</tr>
<tr>
<td>Number of ESG indices</td>
<td>number</td>
<td>2</td>
<td>2</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>Number of ESG ETFs</td>
<td>number</td>
<td>-</td>
<td>2</td>
<td>6</td>
<td>2</td>
</tr>
</tbody>
</table>
ENVIRONMENT OF RESPECT AND EMPOWERMENT

Employee engagement and efficiency

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average employee headcount</td>
<td>people</td>
<td>1,830</td>
<td>1,815</td>
<td>1,984</td>
<td>1</td>
</tr>
<tr>
<td>Average number of male employees</td>
<td>people</td>
<td>924</td>
<td>1,023</td>
<td>1,156</td>
<td>1</td>
</tr>
<tr>
<td>Average number of female employees</td>
<td>people</td>
<td>756</td>
<td>782</td>
<td>828</td>
<td>1</td>
</tr>
<tr>
<td>Total number of employees at year end</td>
<td>people</td>
<td>1,760</td>
<td>1,981</td>
<td>2,199</td>
<td>1</td>
</tr>
<tr>
<td>Total number of male employees at year end</td>
<td>people</td>
<td>932</td>
<td>1,093</td>
<td>1,246</td>
<td>1</td>
</tr>
<tr>
<td>Total number of female employees at year end</td>
<td>people</td>
<td>828</td>
<td>888</td>
<td>953</td>
<td>1</td>
</tr>
<tr>
<td>Wages and other payments to employees (including benefits)</td>
<td>RUB, billion</td>
<td>7.1</td>
<td>8.5</td>
<td>9.9</td>
<td>1</td>
</tr>
</tbody>
</table>

New employee hires, total people 346 484 683 1
New employee hires as a percentage of the workforce % 20 24 31 1
New male employee hires people 200 320 435 1
New male employee hires as a percentage of the workforce % 21 29 35 1
New female employee hires people 146 164 248 1
New female employee hires as a percentage of the workforce % 18 18 26 1
New employee hires under 30 years of age people 147 170 255 1
New employee hires under 30 years of age as a percentage of the workforce % 56 54 66 1
New employee hires 30 to 50 years of age people 186 288 405 1
New employee hires 30 to 50 years of age as a percentage of the workforce % 16 22 27 1
New employee hires over 50 years of age people 13 26 23 1
New employee hires over 50 years of age as a percentage of the workforce % 4 8 7 1
New employee hires who are disabled people 0 2 0 1
Trainees people 37 42 67 1
Trainees hired upon completion of traineeship people 10 12 14 1
Dismissed employees, total people 265 270 460 1
Dismissed male employees people 154 163 279 1
Dismissed female employees people 111 107 181 1
Dismissed employees under 30 years of age people 78 73 127 1
Dismissed employees 30 to 50 years of age people 142 155 280 1
Dismissed employees over 50 years of age people 45 42 53 1
Employee turnover 1 people 11.1 7.9 18 1
Turnover of male employees under 30 years of age % 2.1 1.3 3.5 1

1 This indicator was calculated as the ratio of employees hired to the number of employees at year-end.
2 This indicator was calculated as the ratio of employees hired to the number of employees at year-end.
3 This indicator was estimated as a ratio of number of employees dismissed at their request within a year to the average number of employees in the reporting year.
4 The indicator was estimated as a ratio of number of employees who quit, retired, died, or were dismissed within a year, to the number of employees at year-end.
5 Trainee employees in 2021 continue their traineeship; the final number of trainee hires will be known in autumn of 2022.
6 Other employees include trainees, students, self-employed people, and people employed by entities other than Moscow Exchange (by suppliers, for example).
<table>
<thead>
<tr>
<th>Category</th>
<th>Total</th>
<th>Male</th>
<th>Female</th>
<th>Percentage Male</th>
<th>Percentage Female</th>
</tr>
</thead>
<tbody>
<tr>
<td>Members of the Supervisory Board, total</td>
<td>12</td>
<td>12</td>
<td>12</td>
<td>100%</td>
<td>0%</td>
</tr>
<tr>
<td>Percentage of members of the Supervisory Board</td>
<td>83%</td>
<td>83%</td>
<td>83%</td>
<td>83%</td>
<td>17%</td>
</tr>
<tr>
<td>Percentage of members under 30 years of age</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>100%</td>
</tr>
<tr>
<td>Percentage of members 30 to 50 years of age</td>
<td>42%</td>
<td>42%</td>
<td>42%</td>
<td>42%</td>
<td>100%</td>
</tr>
<tr>
<td>Percentage of members over 50 years of age</td>
<td>58%</td>
<td>58%</td>
<td>58%</td>
<td>58%</td>
<td>100%</td>
</tr>
<tr>
<td>Senior executives, total</td>
<td>20</td>
<td>14</td>
<td>13</td>
<td>70%</td>
<td>30%</td>
</tr>
<tr>
<td>Male senior executives</td>
<td>13</td>
<td>10</td>
<td>10</td>
<td>77%</td>
<td>23%</td>
</tr>
<tr>
<td>Female senior executives</td>
<td>7</td>
<td>4</td>
<td>3</td>
<td>46%</td>
<td>54%</td>
</tr>
<tr>
<td>Percentage of senior executives under 30 years of age</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>100%</td>
</tr>
<tr>
<td>Percentage of senior executives 30 to 50 years of age</td>
<td>70%</td>
<td>64%</td>
<td>54%</td>
<td>64%</td>
<td>36%</td>
</tr>
<tr>
<td>Percentage of senior executives over 50 years of age</td>
<td>30%</td>
<td>36%</td>
<td>46%</td>
<td>36%</td>
<td>64%</td>
</tr>
<tr>
<td>Functional department managers, total</td>
<td>382</td>
<td>408</td>
<td>429</td>
<td>70%</td>
<td>30%</td>
</tr>
<tr>
<td>Male functional department managers</td>
<td>231</td>
<td>254</td>
<td>273</td>
<td>71%</td>
<td>29%</td>
</tr>
<tr>
<td>Female functional department managers</td>
<td>151</td>
<td>154</td>
<td>156</td>
<td>61%</td>
<td>39%</td>
</tr>
<tr>
<td>Percentage of functional department managers</td>
<td>60%</td>
<td>62%</td>
<td>64%</td>
<td>62%</td>
<td>38%</td>
</tr>
<tr>
<td>Percentage of functional department managers under 30 years of age</td>
<td>40%</td>
<td>38%</td>
<td>36%</td>
<td>38%</td>
<td>42%</td>
</tr>
<tr>
<td>Percentage of functional department managers 30 to 50 years of age</td>
<td>1.8%</td>
<td>2.9%</td>
<td>2.8%</td>
<td>1.8%</td>
<td>98%</td>
</tr>
<tr>
<td>Percentage of functional department managers over 50 years of age</td>
<td>72.8%</td>
<td>72.8%</td>
<td>76.9%</td>
<td>72.8%</td>
<td>27.2%</td>
</tr>
<tr>
<td>Functional department managers with disabilities</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>100%</td>
</tr>
<tr>
<td>Specials, total</td>
<td>1,327</td>
<td>1,544</td>
<td>1,742</td>
<td>78%</td>
<td>22%</td>
</tr>
<tr>
<td>Male specialists</td>
<td>657</td>
<td>814</td>
<td>948</td>
<td>78%</td>
<td>22%</td>
</tr>
<tr>
<td>Female specialists</td>
<td>670</td>
<td>730</td>
<td>784</td>
<td>78%</td>
<td>22%</td>
</tr>
<tr>
<td>Percentage of specialists</td>
<td>50%</td>
<td>53%</td>
<td>54%</td>
<td>53%</td>
<td>47%</td>
</tr>
<tr>
<td>Percentage of specialists under 30 years of age</td>
<td>19.3%</td>
<td>19.8%</td>
<td>21%</td>
<td>19.8%</td>
<td>20%</td>
</tr>
<tr>
<td>Percentage of specialists 30 to 50 years of age</td>
<td>67.1%</td>
<td>66.3%</td>
<td>65%</td>
<td>66.3%</td>
<td>35%</td>
</tr>
<tr>
<td>Percentage of specialists over 50 years of age</td>
<td>13.6%</td>
<td>14%</td>
<td>13%</td>
<td>14%</td>
<td>86%</td>
</tr>
<tr>
<td>Specials with disabilities</td>
<td>9</td>
<td>9</td>
<td>8</td>
<td>9%</td>
<td>91%</td>
</tr>
<tr>
<td>Workers, total</td>
<td>31</td>
<td>15</td>
<td>15</td>
<td>76%</td>
<td>24%</td>
</tr>
<tr>
<td>Percentage of workers</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>0%</td>
</tr>
<tr>
<td>Percentage of workers under 30 years of age</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>100%</td>
</tr>
<tr>
<td>Percentage of workers 30 to 50 years of age</td>
<td>54.8%</td>
<td>66.7%</td>
<td>66.7%</td>
<td>66.7%</td>
<td>33.3%</td>
</tr>
<tr>
<td>Percentage of workers over 50 years of age</td>
<td>45.2%</td>
<td>33.3%</td>
<td>33.3%</td>
<td>33.3%</td>
<td>66.7%</td>
</tr>
</tbody>
</table>
## Learning and development

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hours of training, total</td>
<td>hours</td>
<td>48,683</td>
<td>23,993</td>
<td>40,812</td>
<td>1</td>
</tr>
<tr>
<td>Average hours of training per year per employee (as per GRI)</td>
<td>hours</td>
<td>28</td>
<td>12</td>
<td>19</td>
<td>1</td>
</tr>
<tr>
<td>Average hours of training per year per female employee</td>
<td>hours</td>
<td>29</td>
<td>11</td>
<td>17</td>
<td>1</td>
</tr>
<tr>
<td>Average hours of training per year per male employee</td>
<td>hours</td>
<td>26</td>
<td>13</td>
<td>20</td>
<td>1</td>
</tr>
<tr>
<td>Percentage of employees who completed training, total</td>
<td>%</td>
<td>79</td>
<td>60</td>
<td>43</td>
<td>1</td>
</tr>
<tr>
<td>Number of training hours per male senior executive</td>
<td>hours</td>
<td>31</td>
<td>34</td>
<td>84</td>
<td>1</td>
</tr>
<tr>
<td>Number of training hours per female senior executive</td>
<td>hours</td>
<td>66</td>
<td>18</td>
<td>50</td>
<td>1</td>
</tr>
<tr>
<td>Number of training hours per male functional department manager</td>
<td>hours</td>
<td>53</td>
<td>23</td>
<td>40</td>
<td>1</td>
</tr>
<tr>
<td>Number of training hours per female functional department manager</td>
<td>hours</td>
<td>57</td>
<td>26</td>
<td>49</td>
<td>1</td>
</tr>
<tr>
<td>Number of training hours per male specialist</td>
<td>hours</td>
<td>18</td>
<td>10</td>
<td>14</td>
<td>1</td>
</tr>
<tr>
<td>Number of training hours per female specialist</td>
<td>hours</td>
<td>23</td>
<td>8</td>
<td>10</td>
<td>1</td>
</tr>
<tr>
<td>Number of training hours per male worker</td>
<td>hours</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Number of training hours per female worker</td>
<td>hours</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Percentage of employees of the relevant departments who completed sustainability management training, out of the total number of employees</td>
<td>%</td>
<td>-</td>
<td>-</td>
<td>10</td>
<td>2</td>
</tr>
</tbody>
</table>

1 In this report, the average hours of training per year per employee has been calculated using the formula set out in the GRI standard: the total number of training hours is divided by the total number of employees (at year end).
2 The average number of hours of training per year per male senior executive is calculated against the total number of male senior executives at year end (four people), rather than the number who actually underwent training (five people).

## Diversity and equal opportunity

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of women out of the total number of employees</td>
<td>%</td>
<td>47</td>
<td>45</td>
<td>43</td>
<td>1</td>
</tr>
<tr>
<td>Percentage of women on the Supervisory Board</td>
<td>%</td>
<td>17</td>
<td>17</td>
<td>17</td>
<td>2</td>
</tr>
<tr>
<td>Percentage of women out of the total number of functional department managers</td>
<td>%</td>
<td>40</td>
<td>37</td>
<td>36</td>
<td>1</td>
</tr>
<tr>
<td>Percentage of women out of the total number of senior executives</td>
<td>%</td>
<td>35</td>
<td>28</td>
<td>23</td>
<td>1</td>
</tr>
<tr>
<td>Percentage of women in managerial positions in profit-generating areas of the business (front office)</td>
<td>%</td>
<td>-</td>
<td>31</td>
<td>31</td>
<td>1</td>
</tr>
<tr>
<td>Average gender pay gap: all employees</td>
<td>rate</td>
<td>1.17</td>
<td>1.16</td>
<td>1.15</td>
<td>1</td>
</tr>
<tr>
<td>Average gender pay gap: functional department managers</td>
<td>rate</td>
<td>1.27</td>
<td>1.32</td>
<td>1.27</td>
<td>1</td>
</tr>
<tr>
<td>Average gender pay gap: specialists</td>
<td>rate</td>
<td>-</td>
<td>1.39</td>
<td>1.33</td>
<td>1</td>
</tr>
<tr>
<td>Total number of confirmed incidents of discrimination in the reporting period</td>
<td>incidents</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Total number of confirmed incidents of discrimination for the reporting period</td>
<td>incidents</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
</tbody>
</table>

202-1 Average pay of entry-level specialists and workers, including bonuses: total

Average pay of entry-level specialists and workers, including bonuses: males

Average pay of entry-level specialists and workers, including bonuses: females

Minimum statutory monthly pay in Moscow

Ratio of the average pay of entry-level specialists and workers, including bonuses, to the minimum statutory monthly pay in Moscow

Ratio of the average pay of male entry-level specialists and workers, including bonuses, to the minimum statutory monthly pay in Moscow

Ratio of the average pay of female entry-level specialists and workers, including bonuses, to the minimum statutory monthly pay in Moscow

Availability of variable remuneration in the form of shares for employees, other than senior management

1 This indicator was first calculated in 2020.
### Occupational health and safety, and employee well-being

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of employees who completed OHS training</td>
<td>people</td>
<td>374</td>
<td>517</td>
<td>360</td>
<td>1</td>
</tr>
<tr>
<td>Number of work-related injuries, total</td>
<td>incidents</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Number of work-related injuries among employees</td>
<td>incidents</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Work-related injury rate (ratio of the number of work-related injuries of employees to the total number of hours worked)</td>
<td>rate</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Cases of work-related illness</td>
<td>number</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Fatalities as a result of work-related illness</td>
<td>number</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Rate of absenteeism</td>
<td>rate</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Number of workplaces for which a special assessment of working conditions was carried out</td>
<td>workplaces</td>
<td>103</td>
<td>958</td>
<td>0</td>
<td>1</td>
</tr>
</tbody>
</table>

### ADVANCED GOVERNANCE AND RESPONSIBLE BUSINESS PRACTICES

#### Direct economic value, generated and distributed

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Generated direct economic value: total income (revenue)</td>
<td>RUB million</td>
<td>46,148.9</td>
<td>50,575.1</td>
<td>56,059</td>
<td>1</td>
</tr>
<tr>
<td>Distributed direct economic value, including:</td>
<td>RUB million</td>
<td>−44,587.3</td>
<td>−41,875.6</td>
<td>−51,700.3</td>
<td>1</td>
</tr>
<tr>
<td>operating expenses</td>
<td>RUB million</td>
<td>−7,693.4</td>
<td>−7,530</td>
<td>−9,810.2</td>
<td>1</td>
</tr>
<tr>
<td>salaries and other payments to employees (including benefits)</td>
<td>RUB million</td>
<td>−7,113.9</td>
<td>−8,459.3</td>
<td>−9,881.7</td>
<td>1</td>
</tr>
<tr>
<td>payments to capital providers</td>
<td>RUB million</td>
<td>−20,296.6</td>
<td>−19,883.5</td>
<td>−22,559.2</td>
<td>1</td>
</tr>
<tr>
<td>payments to the government (taxes other than VAT and personal income tax)</td>
<td>RUB million</td>
<td>−9,459.3</td>
<td>−5,889.6</td>
<td>−9,414.3</td>
<td>1</td>
</tr>
<tr>
<td>community investment (GRI 203-1); gratis infrastructure and philanthropy</td>
<td>RUB million</td>
<td>−24.1</td>
<td>−113.2</td>
<td>−34.9</td>
<td>1</td>
</tr>
<tr>
<td>Difference between generated direct economic value and distributed economic value</td>
<td>RUB million</td>
<td>1,561.6</td>
<td>8,699.5</td>
<td>4,358.7</td>
<td>1</td>
</tr>
</tbody>
</table>

---

1. As pertains to GRI 403-9 and 403-10, data is only collected for employees of Moscow Exchange Group. The Group does not collect any data on work-related injuries and accidents among its business partners.

2. In 2019, the assessment was carried out for NCC only, while in 2020 it was carried out for Moscow Exchange and NSD. In 2021, no special assessments were carried out.
## Supply chain management

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total procurements</td>
<td>RUB billion</td>
<td>7.0</td>
<td>4.9</td>
<td>6.9</td>
<td>1</td>
</tr>
<tr>
<td>Total number of suppliers</td>
<td>number</td>
<td>–</td>
<td>220+</td>
<td>240+</td>
<td>1</td>
</tr>
<tr>
<td>Total amount of goods procured</td>
<td>RUB million</td>
<td>–</td>
<td>–</td>
<td>3.3</td>
<td>1</td>
</tr>
<tr>
<td>Total amount of services procured</td>
<td>RUB million</td>
<td>–</td>
<td>–</td>
<td>3.6</td>
<td>1</td>
</tr>
<tr>
<td>Share of procurements made from local suppliers</td>
<td>%</td>
<td>99</td>
<td>98.3</td>
<td>98.3</td>
<td>1</td>
</tr>
</tbody>
</table>

## IT

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount of procurements</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>5,857,075/22</td>
<td>1</td>
</tr>
<tr>
<td>Information services</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>136,244/95</td>
<td>1</td>
</tr>
<tr>
<td>Hardware</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>2,342,499/21</td>
<td>1</td>
</tr>
<tr>
<td>Software</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>1,750,129/85</td>
<td>1</td>
</tr>
<tr>
<td>Software development, implementation, and revision</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>1,548,530/62</td>
<td>1</td>
</tr>
<tr>
<td>Communications services</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>130,670/60</td>
<td>1</td>
</tr>
<tr>
<td>Share of procurements</td>
<td>%</td>
<td>–</td>
<td>82.8</td>
<td>84.5</td>
<td>1</td>
</tr>
</tbody>
</table>

## Administrative

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount of procurements</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>520,708/62</td>
<td>1</td>
</tr>
<tr>
<td>Motor vehicles</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>8,400</td>
<td>1</td>
</tr>
<tr>
<td>Procurement of fixed assets and equipment</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>45,544/68</td>
<td>1</td>
</tr>
<tr>
<td>Office maintenance</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>48,711/32</td>
<td>1</td>
</tr>
<tr>
<td>Construction and operation of buildings</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>418,052/62</td>
<td>1</td>
</tr>
<tr>
<td>Share of procurements</td>
<td>%</td>
<td>–</td>
<td>3.9</td>
<td>7.5</td>
<td>1</td>
</tr>
</tbody>
</table>

## Consulting and insurance services

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount of procurements</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>272,558/08</td>
<td>1</td>
</tr>
<tr>
<td>Consulting and professional services</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>184,778/08</td>
<td>1</td>
</tr>
<tr>
<td>Insurance</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>87,780/00</td>
<td>1</td>
</tr>
<tr>
<td>Share of procurements</td>
<td>%</td>
<td>–</td>
<td>4.2</td>
<td>–</td>
<td>1</td>
</tr>
</tbody>
</table>

## Marketing and PR

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount of procurements</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>146,683/73</td>
<td>1</td>
</tr>
<tr>
<td>Events</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>43,095/26</td>
<td>1</td>
</tr>
<tr>
<td>Advertising and design</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>98,135/85</td>
<td>1</td>
</tr>
<tr>
<td>Gifts and printing</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>5,452/62</td>
<td>1</td>
</tr>
<tr>
<td>Share of procurements</td>
<td>%</td>
<td>–</td>
<td>2.7</td>
<td>2.1</td>
<td>1</td>
</tr>
</tbody>
</table>

## Security

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount of procurements</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>102,508/5</td>
<td>1</td>
</tr>
<tr>
<td>Share of procurements</td>
<td>%</td>
<td>–</td>
<td>0.5</td>
<td>1.5</td>
<td>1</td>
</tr>
</tbody>
</table>

## HR

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Unit of measurement</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Reporting perimeter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount of procurements</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>8,487/46</td>
<td>1</td>
</tr>
<tr>
<td>Employee training</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>HR management</td>
<td>RUB thousand</td>
<td>–</td>
<td>–</td>
<td>8,487/46</td>
<td>1</td>
</tr>
<tr>
<td>Share of procurements</td>
<td>%</td>
<td>–</td>
<td>10.1</td>
<td>0</td>
<td>1</td>
</tr>
</tbody>
</table>
### RESOURCES EFFICIENCY AND ENVIRONMENTAL IMPACT

#### Indicator | Unit of measurement | 2019 | 2020 | 2021 | Reporting perimeter
--- | --- | --- | --- | --- | ---
302-1 Energy consumption | TJ | 58.1 | 55.0 | 56.6 | 1
302-1 Electricity consumption, total | TJ | 18.3 | 19.9 | 20.6 | 1
302-1 Heat consumption | TJ | 19.2 | 16.7 | 21.6 | 1
302-1 Petrol and diesel fuel consumption, total | liters, thousand | 77.9 | 52.2 | 58.4 | 1
302-1 Diesel fuel consumption | liters, thousand | 7.2 | 5.9 | 8.8 | 1
302-1 Petrol and diesel fuel consumption, total | TJ | 2.56 | 1.7 | 1.9 | 1
302-1 Diesel fuel consumption | TJ | 0.26 | 0.2 | 0.3 | 1
302-1 Petrol consumption | TJ | 2.3 | 1.5 | 1.6 | 1
302-3 Energy intensity per revenue, total | GJ/RUB million | 75.5 | 51.6 | 58.1 | 1
302-3 Electricity intensity per revenue, data centers | GJ/person | 0.42 | 0.41 | 0.38 | 1
302-4 GHG emissions | t CO₂ | 233.7 | 119.9 | 132.9 | 1
305-3 Indirect CO₂ emissions, Scope 1 (based on fuel consumption and coefficients pursuant to the Order of the Ministry of Natural Resources and Environment of the Russian Federation No. 15-r, dated 16 April 2015) | t CO₂ | 96.6 | 72.8 | 63.6 | 16
305-3 Indirect GHG emissions from purchased electricity (location-based), Scope 1 | t CO₂ | 3,966.3 | 3,626.5 | 3,838.2 | 16
305-3 Indirect GHG emissions from electricity consumption (market-based), Scope 2 | t CO₂ | - | - | 2,593.6 | 1
305-3 Direct CO₂ emissions from purchased heat (location-based), Scope 2 | t CO₂ | 1,188.9 | 1,029.2 | 1,331.9 | 16
305-3 Gross indirect CO₂ emissions from purchased electricity and heat, Scope 2 | t CO₂ | 6,551.3 | 4,656.7 | 4,271.6 | 16
305-3 Indirect GHG emissions, business trips by air, Scope 3 | t CO₂ | 264.5 | 30.6 | 32.1 | 16
305-3 Indirect GHG emissions, business trips by rail, Scope 3 | t CO₂ | 3 | 0 | 1 | 1
305-3 Indirect GHG emissions from transmission of purchased electricity, Scope 3 | t CO₂ | 380.2 | 381.4 | 373.6 | 1

1. The Group does not consume energy and obtain it from renewable energy sources, nor does it sell them.
2. Data on heat energy differ from the data provided in the 2020 Sustainability Report due to changes in the calculation methods.
3. GHG emissions for Scope 1 and 2 were calculated using coefficients approved by Order of the Ministry of Natural Resources and Environment of the Russian Federation No. 30, dated 30 June 2015. To estimate emissions for Scope 3, we also used openly available data on specific fuel consumption by generation facilities of Mosenergo PJSC and the average losses in electric and heat networks of PJSC MOEX and PJSC MOEX for 2020–2021. Scope 1 and 2 include only CO₂ emissions.
4. The emission factor for road transport was calculated for high-speed trains of the Sapsan type.
MOEX Group’s focus areas: ‘GREAT’

- Genuine partnership and engagement with the community ........................................ 90
- Responsible investing and sustainable growth .............................................................. 99
- Environment of respect and empowerment ................................................................... 104
- Advanced governance and responsible business practices .......................................... 111
- Trusted and resilient market infrastructure ................................................................. 120
- Resource efficiency and environmental impact ............................................................ 128
MOEX GROUP’S FOCUS AREAS: ‘GREAT’

GENUINE PARTNERSHIP AND ENGAGEMENT WITH THE COMMUNITY

Financial literacy improvement activities

- The Best Individual Investor contest has been held since 2003 and is the world’s largest exchange competition for traders.
- Moscow Exchange is the general partner of Fincontest, or the All-Russian Financial Markets Knowledge Contest, which has been held annually by the Financial University under the Government of the Russian Federation since 2009.
- Moscow Exchange Group supports projects of the Central Bank of Russia and the Russian Ministry of Finance to develop financial skills and awareness and improve the financial literacy of the public.

The following activities were held in 2021 to improve financial literacy:
- webinars for individual investors;
- contests and “marathons” (Investmarathon, Invest Battle Championship);
- educational programs (the Telegram channels MOEX – Moscow Exchange and Moscow Exchange School; the Money Makes Money podcast).

Key documents:
- Strategy for the Improvement of Financial Literacy in the Russian Federation, approved by the Russian Ministry of Finance on 25 September 2017

Responsible bodies:
- Strategy Department
- Business Development Department
- Corporate Communications Department
- Equities Market Department
- Bond Market Department
- Issuer Relations Department

Moscow Exchange Group is a party to the global Ring the Bell for Gender Equality initiative. Every year on the 8th of March, participating exchanges ring bells at opening or closing of trading as a gesture to promote the principles of gender equality and the empowerment of women in business, politics, and the economy.

The main goal of this initiative is to urge businesses to take measures to promote sustainability goals through the empowerment of women. In particular, the role of exchanges involves promoting gender equality among companies whose shares are listed on their floors and in calling for adherence to the Women’s Empowerment Principles (WEP).

Information about Moscow Exchange Group’s adherence to the principle of no discrimination and gender equality in regards to its employees is provided in the subsection “Environment of respect and empowerment” of the section “2021 Sustainability Performance Highlights”.

Investments in communities and charity projects

Moscow Exchange’s charity activities aim to address important social issues in those areas where it has strong competencies or strategic interests. It also sponsors external projects to strengthen relationships with customer groups and professional and business communities, and also to develop the Russian financial market. The Group’s largest corporate donors are Moscow Exchange and the National Settlement Depository.

Moscow Exchange develops, selects, and implements charity programs and projects in accordance with its Charity Policy, which sets out the principles, priority areas, and procedures for interacting with partners.

In the beginning of 2022, Moscow Exchange set new priorities for its charitable activities:
- educational initiatives for people of all ages, aimed at improving the financial, investment, and technological literacy of the public;
- support for educational institutions of all levels, educators and students (e.g., through grants and scholarships), research and popular science, and publications in the fields of finance, economics, and technology;
- assisting children, the economically disadvantaged, people who have found themselves in difficult situations (by helping them get back to an active life and find a decent job), and WWI veterans;
- programs that promote stewardship of the environment among companies and individuals; programs that protect biodiversity and encourage the development of renewable energy sources;
- programs that raise awareness among individuals and organizations of the importance of socially responsible behavior and participation in charitable activities; programs that support and develop volunteering;
- corporate volunteering, i.e., the involvement of Group employees in charity activities, which includes cash donations by employees.

Key documents:
- Code of Professional Ethics of Moscow Exchange
- ILO Conventions No. 111 and 156
- UN Universal Declaration of Human Rights

Responsible bodies:
- Internal Control and Compliance Department
- Corporate Communications Department

This initiative is a partnership of a number of international organizations, including the UN Global Compact and the Sustainable Stock Exchange Initiative.
A Charity Committee has been established, which is responsible for planning, analyzing, and evaluating projects, as well as for issuing opinions and recommendations to the Executive Board and the Chairman of the Executive Board of Moscow Exchange when selecting applicants to participate in charity programs.

413-1

The effectiveness of charitable activities is evaluated using feedback from partners and beneficiaries, obtained through email in the form of a report from the charities involved.

Moscow Exchange cooperates with a number of reputable charitable foundations, thereby ensuring transparency and effectiveness of the allocated funds, while also increasing the number of end beneficiaries.

New projects are considered by the Charity Policy Committee based on the following criteria:

- alignment with Moscow Exchange’s strategic priorities;
- significance in achieving the UN Sustainable Development Goals, national priorities, and other initiatives and partnerships in which Moscow Exchange is a member;
- the positive impact of the charity programs;
- the ability of the beneficiaries to continue to implement qualitative changes after the program’s completion;
- the absence of compliance risks and negative information about the beneficiaries.

Moscow Exchange seeks to ensure that all companies of the Group act in accordance with the Charity Policy, thereby ensuring transparency of the allocated funds and harmonizing the principles and approaches used in their charitable activities with it.

Moscow Exchange does not support organizations that discriminate based on gender, sexual orientation or nationality, nor does it participate, directly or indirectly, in financing organizations whose activities involve human rights violations, the creation or proliferation of weapons of mass destruction, or projects that pose a risk of environmental pollution.

### Key documents:
- Charity Policy of Moscow Exchange
- Regulation on Sponsorship and Financing of External Projects by Moscow Exchange
- Regulation on the Charity Policy Committee
- Regulation on Sponsorship by Moscow Exchange
- Regulation on the Moscow Exchange Sponsorship Committee
- Regulation on the Charity Commission of the National Settlement Depository

### Responsible bodies:
- The Charity Policy Committee of the Moscow Exchange Executive Board
- For charity programs with a budget exceeding RUB 10 million, relevant opinions, proposals, and recommendations are submitted to the Moscow Exchange Executive Board for consideration

### Corporate volunteering
Volunteering is an important aspect of the corporate culture of Moscow Exchange Group: it brings staff together by fostering common values. Moscow Exchange employees can participate in partner projects as volunteers or donors.

Employee participation in charity projects is encouraged, including by the use of an internal “currency” (a description of the MEMS project is provided in the subsection “Environment of respect and empowerment” of the section “Sustainability Approaches and Procedures”).

Employees receive information about charity events in the “Company News” weekly morning newsletter; they can also find out about charitable activities on the special Corporate Charity page on the intranet. There, staff can apply to participate in volunteer events, make donations, or post announcements about alternative charitable projects in order to find like-minded people.

### Key documents:
- AA1000 AP AccountAbility Principles
- AA100 SES AccountAbility Principles
- Regulation on the Exchange Council

### Responsible bodies:
- Strategy Department
- Corporate Communications Department
- Personnel and HR Policy Department
- Chief Operating Officer (COO)
- Managing Director for Interaction with Issuers and Government Authorities
- Head of Investor Relations

Interaction with stakeholders, partnerships, and associations

The Moscow Exchange Council and user committees

The Moscow Exchange Council is the organization’s main consultative and advisory body. Its objective is to elaborate strategic proposals for developing the Russian financial market and to represent trade participants and consumers of Moscow Exchange’s services so that their needs can be fully taken into account. The Moscow Exchange Council is made up of members of management of leading market participants, heads of self-regulated organizations, and representatives of management companies, investment banks, and the Central Bank of Russia.

The Exchange Council has the following competencies:

- elaborating proposals and providing recommendations to the Supervisory Board on how to improve Moscow Exchange Group’s development strategy;
- discussing priority projects and selecting at least one project to be used as a KPI for the management of Moscow Exchange, as well as providing relevant recommendations to the Supervisory Board or other competent management bodies;
- developing proposals to improve the exchange’s infrastructure and clearing technologies, and to attract market participants from new client segments and other areas, and providing recommendations to the Supervisory Board or other competent bodies.

Moscow Exchange Group interacts with market participants via user committees. Through these committees, Moscow Exchange Group gathers feedback from clients on planned innovations to products and services, improves its exchange infrastructure, and prepares proposals for amending financial market regulations.

The user committees are advisory bodies made up of stakeholder representatives. Committee members give recommendations to management bodies of Moscow Exchange on its strategic development and operations in certain markets. The user committees and the Exchange Council were created pursuant to Federal Law No. 325-FZ “On Organized Trading”.

The Moscow Exchange Group actively works to build constructive dialogue with Russian and foreign investors, market participants, current and potential issuers, regulators, and professional communities. It pursues this by engaging in direct communication through advisory bodies, working groups, investment conferences, forums, and specialized training events. These efforts help attract new investors to the Group’s markets, thereby expanding the client base, increasing the liquidity of financial markets, and bringing an inflow of investment to the Russian economy.

Many areas of Moscow Exchange’s activities involve interacting with government authorities; these relations are supervised by the Managing Director for Interaction with Issuers and Government Authorities.

Moscow Exchange Group is encouraged, including by the use of an internal “currency” (a description of the MEMS project is provided in the subsection “Environment of respect and empowerment” of the section “Sustainability Approaches and Procedures”).

Employees receive information about charity events in the “Company News” weekly morning newsletter; they can also find out about charitable activities on the special Corporate Charity page on the intranet. There, staff can apply to participate in volunteer events, make donations, or post announcements about alternative charitable projects in order to find like-minded people.
As of 31 December 2021, Moscow Exchange had the following user committees:

- Committees created pursuant to legislative requirements:
  - Foreign Exchange Market Committee
  - Derivatives Market Committee
  - Repo and Securities Lending Committee
  - Stock Exchange Committee
  - Fixed-Income Securities Committee
  - Deposit Market Committee
  - Credit Market Committee

- Committees created at the initiative of Moscow Exchange:
  - Exchange Council
  - Settlements and Transaction Documentation Committee
  - Collective Investment Market Committee
  - Share Issuers Committee
  - Bond Issuers Committee
  - Primary Market Committee
  - Index Committee
  - Debt Market Indicators Committee
  - Information Technology Committee

- Committees under the National Settlement Depository:
  - Quality and Risk Committee
  - Committee on Settlement and Depository Activities and Tariffs
  - Committee on Interaction with Registrars and Depositories
  - Central Depository Services Users Committee
  - Repository Services Users Committee

Most of the committees feature members who are professional market participants: banks, brokers, investment companies, issuers, and non-finance companies. They are appointed for a term of one year.

Members prepare proposals for amending legislation and improving the regulatory framework, and also review issues of regulation of public circulation and issuance of securities, information disclosure and corporate governance. The committees also elaborate proposals for process solutions to improve the organization of exchange trading, clearing and settlements, and the expansion of tools and services.

For the convenience of everyone involved, Moscow Exchange publishes a monthly user committee digest containing a list of issues considered at meetings of the Exchange Council and the user committees, as well as the decisions taken. Information on the work of the committees is available to the public on the websites of Moscow Exchange and the National Settlement Depository.

**Sustainability initiatives and partnerships**

102-13

In keeping with its mission and corporate values, Moscow Exchange participates actively in various Russian and international organizations, associations, and voluntary initiatives.

- Moscow Exchange is a regular participant of the Ring the Bell for Financial Literacy initiative of the World Federation of Exchanges. It also participates in the global Sustainable Stock Exchanges (SSE) initiative, which was launched in 2009 at the initiative of former UN Secretary-General Ban Ki-moon. It is a partner program of the UN Conference on Trade and Development (UNCTAD), the UN Global Compact network, the UN Environment Programme Finance Initiative (UNEP FI), and the Principles of Responsible Investment (PRI).

- Moscow Exchange Group participates actively in numerous working groups on sustainable financing and responsible investing together with other market participants and regulators. One example is an initiative to encourage best practices in business ethics, compliance, and anti-corruption by the Russian Association of Business Ethics and CSR (Russian Business Ethics Network, RBEN).

**Interaction with market participants and regulators**

Moscow Exchange Group holds conferences, roundtable discussions, and seminars involving various partners from the corporate and public sectors. At these events, participants discuss legislative developments, IR trends, and topics pertinent to sustainability.

Key events in the field of corporate governance and investor relations include a yearly annual report competition, which is held by Moscow Exchange together with the RCB media group. The competition contributes to making public companies more transparent and disclosures more useful for investors and customers.
<table>
<thead>
<tr>
<th>Item</th>
<th>Stakeholder group</th>
<th>Key topics for engagement</th>
<th>Forms of engagement</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>Professional unions, associations, and councils: National Association of Stock Exchange Participants, National Finance Association, Russian Union of Industrialists and Entrepreneurs, and others</td>
<td>Cooperation on development of financial market regulation, improving financial literacy</td>
<td>Joint events for financial market participants, consultations on regulatory initiatives in the area of financial market development, Support for activities to improve financial literacy</td>
</tr>
<tr>
<td>7</td>
<td>Moscow Exchange shareholders and investors</td>
<td>Corporate governance, exercise of shareholders’ rights, Development of the business of Moscow Exchange Group</td>
<td>Interaction involving the presentation of information and analytics at conferences and road shows, and through conference calls and webinars, Participation by stakeholders in the exercise of their shareholder rights and in the relevant corporate governance processes</td>
</tr>
<tr>
<td>8</td>
<td>Market participants</td>
<td>Providing information on trading at Moscow Exchange, reporting on the results of trading for market participants, Discussing growth areas and new tools</td>
<td>Participation by appropriately licensed legal entities in trading on Moscow Exchange markets, Customer service, including KYC (Know Your Customer) procedures, information on products and services, participation in user committees, and use of Moscow Exchange software</td>
</tr>
<tr>
<td>9</td>
<td>Customers of market participants: legal entities and individuals</td>
<td>Providing information on trading at Moscow Exchange, products, quotes, the trading calendar, and training</td>
<td>Provision by Moscow Exchange of the current list of traders, quotes, the trading calendar, products, and training for private investors</td>
</tr>
<tr>
<td>10</td>
<td>Issuers</td>
<td>Issuers raising capital on Moscow Exchange’s markets, Ensuring issuers’ compliance with listing rules</td>
<td>Providing direct access to the FIX, Money, and Bond Markets, Informing potential issuers about financing opportunities, Interaction regarding disclosure by issuers, Issuers’ participation in user committees, Joint activities</td>
</tr>
<tr>
<td>11</td>
<td>International partners and professional associations: WFE, FESE, FIA, SSE, foreign exchanges</td>
<td>Cooperating during on-exchange trading</td>
<td>Holding exchange forums, participating in conferences, implementing joint projects, Cooperation in on-exchange trading, providing market access, sharing experience</td>
</tr>
<tr>
<td>12</td>
<td>News agencies and the media</td>
<td>Building transparent relations and providing relevant information in a timely manner</td>
<td>Holding awareness-raising events, Distributing press releases and newsletters</td>
</tr>
<tr>
<td>13</td>
<td>Employees</td>
<td>Working conditions, incentives, personnel management, and staff training processes; efficiency and cross-functional interaction</td>
<td>Creating conditions for the professional growth of employees, training Activities aimed at fostering engagement and furthering the corporate culture</td>
</tr>
<tr>
<td>14</td>
<td>Suppliers and contractors</td>
<td>Procurement procedures, Promoting competition, Developing new products and services, Requirements for vendors and contractors, responsible supply chains</td>
<td>Creating transparent conditions for participation in the procurement process, Holding tenders and concluding transactions with vendors and contractors, Fulfilling contractual obligations</td>
</tr>
</tbody>
</table>

### Enhancing the professionalism of the investor relations (IR) community

Moscow Exchange operates the MOEX IR Academy, a platform for dialogue within the IR community that encourages the exchange of opinions between professionals. It also serves as a discussion club and a center for the development of professional principles and standards in the field of IR.

In 2021, Moscow Exchange and MOEX IR Academy supported the organization of webinars on non-financial information disclosure under the TCFD climate standard for Russian businesses. Particular attention was paid to the energy, agriculture, and pulp and paper industries; disclosure of climate data for issuers was also discussed.


In 2021, Moscow Exchange took part in 11 webinars aimed at enhancing the professionalism of the IR community through responsible investing and non-financial information disclosure. In total, 1,293 people joined the webinars.

At the end of 2021, Moscow Exchange held the first meeting of the MOEX IR Club, gathering together IR teams of various Russian issuers. The event was organized by the Issuer Relations Department.

### Developing partnerships with institutions of higher education

Moscow Exchange cooperates with leading universities to ensure the availability of high-skilled, well-trained personnel for the Group and the financial industry. It also works to promote the implementation of research projects in the fields of economics and technology.

Moscow Exchange cooperates closely with the Higher School of Economics, the New Economic School, Lomonosov Moscow State University, the Financial University under the Government of the Russian Federation, Plekhanov Russian University of Economics, and the MEPhI National Research Nuclear University. Together with these institutions, Moscow Exchange conducts research on the securities market, IT, and risk management. It creates special software to train young specialists.

Through career guidance programs, students are given the chance to apply for an internship at Moscow Exchange Group in their field of interest. Group employees help them implement their projects. Information on internships at Moscow Exchange Group is published on its careers page. The Group also actively develops special educational programs where senior managers and leading specialists of the Group’s companies give master classes for students. Additional information on the internship program in 2021 can be found in the section “2021 Sustainability Performance Highlights.”

In 2018, with the support of Moscow Exchange, Higher School of Economics created a basic Department of Financial Market Infrastructure at the Faculty of Economics, which brings together HSE professors and employees of Moscow Exchange. Moscow Exchange also helps the Financial University run the Securities and Financial Engineering master’s program. Sponsor support is provided to the Cybernetics Department of the Institute of Intelligent Cybernetic Systems at MEPhI National Research Nuclear University, which, in turn, implements the department’s curricula and consults students on their diploma projects and research in the interests of Moscow Exchange.

Moscow Exchange, together with the Financial University, organizes Fincontest, a specialized knowledge contest about financial markets that was first launched several years ago. Moscow Exchange helps assess the participants’ knowledge in the areas of corporate finance, securities markets, and financial analysis. It provides contestants with the chance to start their professional career.

Moscow Exchange participates in the Novosibirsk Region Governor’s Cup for On-exchange Financial Market for students of Russian universities.
Global trends show that investment companies and financial institutions have been transforming their investment strategies. Issuers’ commitment to the principles of sustainability is becoming an important factor in choosing recipients of investment. As a member of the Sustainable Stock Exchanges (SSE) initiative, Moscow Exchange upholds the principles of responsible investment and creates opportunities to expand sustainable practices in Russia.

In cooperation with the Ministry of Economic Development of the Russian Federation, Moscow Exchange launched the Sustainability sector, a special sector for trading target-oriented securities.

Objectives of the Sustainability sector:

- help companies, public authorities, and other issuers raise funds for environmental and social projects;
- create an environment conducive to foreign investment in Russian bonds;
- offer a set of instruments for funding initiatives that meet the objectives of national projects and comply with Decree of the President of the Russian Federation No. 204 of 7 May 2018 “On National Goals and Strategic Objectives of the Development of the Russian Federation to the Year 2024”.

The Sustainability sector has four independent segments:

- **Green bonds**: debt securities, the proceeds of which are used to finance projects aimed at improving the environment. Such projects include renewable energy sources, environmentally friendly transport, energy efficiency improvement, reduction of GHG emissions, waste recycling, etc.
- **Social bonds**: debt securities, the proceeds of which are used to finance social projects. Such projects include creating social infrastructure or developing social services, building affordable housing, developing small businesses, and other social objectives.
- **Sustainability bonds**: this segment features the securities of companies implementing projects that promote environmental and social sustainability.
- **National and adaptation projects**: securities in this segment must be consistent with the objectives of national projects or be compliant with the taxonomy of climate adaptation projects.

### Participation in initiatives and associations in 2021

<table>
<thead>
<tr>
<th>Moscow Exchange Group Company</th>
<th>Item</th>
<th>Initiative/Association Title</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sustainability initiatives</strong></td>
<td>1</td>
<td>UN Global Compact (support of the principles)</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>WFE Sustainability Working Group</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>WFE Cyber Security Working Group</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>WFE Operational Risk Working Group</td>
</tr>
<tr>
<td></td>
<td>5</td>
<td>UN Sustainable Stock Exchanges (SSE) initiative</td>
</tr>
<tr>
<td></td>
<td>6</td>
<td>Ring the Bell for Gender Equality</td>
</tr>
<tr>
<td></td>
<td>7</td>
<td>Ring the Bell for Financial Literacy</td>
</tr>
<tr>
<td></td>
<td>8</td>
<td>CPMI–IOSCO Principles for Financial Market Infrastructure (evaluation of conformity to the principles by the Group’s companies)</td>
</tr>
<tr>
<td></td>
<td>9</td>
<td>Association for Improvement of Financial Literacy</td>
</tr>
</tbody>
</table>

### Other significant associations and initiatives

<table>
<thead>
<tr>
<th>Moscow Exchange Group Company</th>
<th>Item</th>
<th>Initiative/Association Title</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>World Federation of Exchanges (WFE)</strong></td>
<td>1</td>
<td>Futures Industry Association (FIA)</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>International Association of Exchanges of Countries of the Commonwealth of Independent States (CIS)</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>Russian National SWIFT Association (ROSSWIFT)</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>Financial Technology Development Association</td>
</tr>
<tr>
<td><strong>European Central Securities Depositories Association</strong></td>
<td>1</td>
<td>European Central Securities Depositories Association</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Association of Eurasian Central Securities Depositories</td>
</tr>
<tr>
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<td>3</td>
<td>International Securities Services Association (ISSA)</td>
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<td>4</td>
<td>Russian National SWIFT Association (ROSSWIFT)</td>
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<td>5</td>
<td>Self-Regulated Organization National Finance Association (SRO NFA)</td>
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<tr>
<td><strong>Global Association of Central Counterparties</strong></td>
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<td>Global Association of Central Counterparties</td>
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<td>2</td>
<td>European Association of CCP Clearing Houses – Central Counterparties (EACH)</td>
</tr>
</tbody>
</table>

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Principles for including bonds in the Sustainability sector

The green bonds segment features bonds issued by Russian issuers whose bond issue(s), investment project(s), or issuer’s document(s) meet the internationally recognized Green Bonds Principles (GBP) of the International Capital Market Association (ICMA) and the Social Bonds Principles (SBP) of the International Capital Market Association (ICMA) or the Climate Bonds Initiative (CBI) and the Russian principles/standards for environmental protection and/or green financing and/or sustainability established by the Securities Issuance Standards, provided that the issue, issuer, or project has received independent verification confirming compliance with the above principles or standards.

The social bonds segment features bonds issued by Russian issuers whose bond issue(s), investment project(s), or issuer’s document(s) meet the internationally recognized Social Bonds Principles (SBP) of the International Capital Market Association (ICMA) and the Russian principles/standards for social financing and/or sustainable social projects established by the Securities Issuance Standards, provided that the issue, issuer, or project has received independent verification confirming compliance with the above principles or standards.

The sustainability bonds segment may feature bonds in relation to which the bond issue(s), investment project(s), or issuer’s document(s) meet the following internationally recognized standards and documents:

- Green Bonds Principles (GBP) of the International Capital Market Association (ICMA) or the Climate Bonds Initiative (CBI);
- Social Bonds Principles (SBP) of the International Capital Market Association (ICMA);
- the Russian Principles/Standards for Social Financing and/or Sustainable Social Projects, established by the Securities Issuance Standards.

The national and adaptation projects segment may feature bonds that meet the following requirements:

- a decision of a government body, official, or interdepartmental committee confirming alignment with the objectives and results of one of the following national projects: “Environmental Protection”, “Housing and Urban Environment”, “Comprehensive Plan of Modernization and Expansion of Key Infrastructure”, “Demographics”, “Healthcare”, “Education”, “Labor Productivity and Employment Support”, “Culture” or “Introduction of Best Available Technologies”; or independent verification confirming the project’s compliance with the criteria (taxonomy) for adaptation projects, with the condition that it will be financed with the proceeds from the bond placement.

Green financing is a key tool for lower-carbon development.

Listing rules

In order to be considered for inclusion in the Sustainability sector, an issuer must submit the following:

1. an application for inclusion in the sector;
2. a certificate from an external verifying body;
3. a statement that the issuer undertakes to disclose information (no less than once a year throughout the lifetime of the bond) confirming that the funds raised are being put to appropriate use;
4. for the national projects segment: a statement by a government body, official, or interdepartmental committee confirming that the offering, the issuer, or the investment project are consistent with the objectives and results of one of the national projects.

Key documents:

- Listing Rules of Moscow Exchange
- Social Bonds Principles (SBP)
- Green Bond Principles of the International Capital Market Association (ICMA), 2018
- Climate Bonds Standard of the Climate Bonds Initiative
- VEB RF Taxonomy (VEB RF National Methodology for Green Financing)

The national and adaptation projects segment may feature bonds that meet the following requirements:

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Green financing is a key tool for lower-carbon development.

ESG indices

ESG indices

103-2

The Responsibility and Transparency Index and the Sustainability Vector Index are calculated in accordance with the partnership agreement signed in March 2019 between Moscow Exchange and the RSPP. The purpose of the partnership agreement is to develop and boost sustainable business practices among Russian issuers, improving their investment appeal and helping them become more transparent and trustworthy for investors.

The composition of the indices is reviewed annually through an RSP analysis of the reporting of major Russian companies. The indices are released daily on the websites of Moscow Exchange and the RSPP, as well as through various news agencies.

Key document:

- Methodology for Calculating Moscow Exchange ESG Indices

Responsible body:

- Indices and Market Data Department

ESG ETFs

103-2

ESG ETFs build their investment strategies and determine their asset structure based on the relevant sustainability stock indices of Moscow Exchange. By purchasing units of ESG ETFs, investors gain access to a diversified portfolio of the most successful Russian companies that comply with sustainability principles. Investors can manage the units independently. ETFs are the most popular securities with retail investors across the world.

Key document:

- Rules for Trading on the Equity and Bond Market of Moscow Exchange

Responsible body:

- Equity Market Department

Decree of the Russian Government No. 532 dated 30 April 2019 provides for partial compensation of the costs of issuing shares and bonds and the costs of agreements on assignment of a credit rating.

ESG ETFs

Measures to support companies in the Growth sector include:

- subsidies of up to 70% of the coupon rate;
- compensation of up to RUB 2.5 million for the issuer’s costs on placement of the securities;
- anchor investments from SME Bank, with an option to act as the co-organizer of the offering;
- guarantees and endorsements for SME Corporation’s bond offerings (up to RUB 1 billion);
- help from the territorial divisions of the Central Bank of Russia in organizing events for issuers;
- waived listing fees for SMEs placing bonds of up to RUB 400 million up to the end of 2022;
- reduced free-float listing requirements for Tier II stocks: RUB 500 million (compared to RUB 1 billion) for ordinary stock, and RUB 250 million (compared to RUB 500 million) for preferred stock.

Growth sector

In 2017, Moscow Exchange launched the Growth sector in cooperation with the Central Bank of Russia and a number of other partners, including the Ministry of Economic Development of the Russian Federation, SME Corporation and SME Bank.

The purpose of the sector is to help promising small and medium-sized enterprises raise capital. The primary objective of the sector is to facilitate the implementation of the national project “Small and Medium-sized Entrepreneurship and Support of Individual Entrepreneurship Initiatives.” The sector already has a mature ecosystem that includes:

- a set of rules of entry to the sector, including a risk management system for vetting companies;
- a set of partners (development institutions);
- a network of professional service organizations;
- government support tools;
- a specialized project team within Moscow Exchange which is experienced in working with SMEs.

The Growth sector of Moscow Exchange is supported by the government, per Russian Government Decree No. 652 dated 30 April 2019, which provides for partial compensation of the costs of issuing shares and bonds and the costs of agreements on assignment of a credit rating.

Responsible body:

- SME Corporation and SME Bank

Committees:

- Expert Committee of the Sector of Entrepreneurship Initiatives
- Interdepartmental committee confirming alignment of the projects with the objectives of the sector

Key document:

- Rules for Trading on the Equity and Bond Market of Moscow Exchange

Responsible body:

- Rules for Trading on the Equity and Bond Market of Moscow Exchange

The Board includes representatives of Moscow Exchange’s partners: the Central Bank of Russia, the SME Corporation, SME Bank, Industrial Development Fund, and other organizations.

### Listing rules

**Listed rules for SMEs:**
- The issuer must have been established at least three years prior to the issue.
- The issuer must have revenue of at least RUB 120 million. The maximum revenue must be less than RUB 10 billion for bond issuers and less than RUB 25 billion for issuers of shares;
- For bond issuers:
  - the minimum issue volume is RUB 50 million;
  - there must be an assigned rating or support from development institutions (guarantees from the SME Corporation, anchor investments from SME Bank).

### Company screening and risk management

Companies that wish to join the Growth sector must meet a number of criteria. Each new issuer must undergo KYC (Know Your Customer) procedures that include a review by experts from Moscow Exchange departments who check each applicant against a set of risk parameters. If the review reveals any potential risks, the issuer’s file is forwarded to the Growth Sector Board Committee, which then makes a final recommendation.

Many small and medium-sized businesses joined the Growth sector after receiving support from our partners, such as guarantees and endorsements from the SME Corporation, anchor investments from SME Bank, or a subsidized coupon rate (which significantly reduces the likelihood of default). Issuers in high-risk industries (real estate development, lease financing) can only join the Growth sector if they have an approved credit rating and have received a favorable recommendation from the Committee.

Priority is given to:
- SMEs;
- companies showing growth in financial results;
- industrial companies;
- companies with export revenue;
- companies that have received support from the SME Corporation, SME Bank, FRP, REC or RDIF.

### Innovation and Investment Market

**Listed rules**

**Key listing requirements:**
- market capitalization of at least RUB 500 million;
- business areas: telecommunications, internet, software, development and production of semiconductor devices, biotechnology, pharmaceuticals, high-tech, knowledge-based technologies, new materials, energy efficiency, etc.;
- credit rating assigned to the issuer and/or its bond issue by one of the approved ratings agencies;
- securities prospectus drawn up in line with Russian laws and information disclosure standards;
- investment memorandum containing detailed information about the company’s financial and operational activity and the main goals and plans for delivering potential growth.

The innovative segment requires the involvement of a listing agent (i.e., an advisory, broker, or investment company accredited by Moscow Exchange).

**Measures to support companies in the IIM sector:**
- marketing and promotion programs for issuers conducting an IPO/SPO;
- attracting investors targeting companies of the given type;
- IR services and tools: presentations for investors, roadshows, webinars;
- information and analytical coverage based on monthly IIM reports;
- access to pension savings: according to Central Bank of Russia Regulation No. 580-P, up to 5% of the portfolio of pension savings of NPFs can be invested in shares of issuers included in the IIM-Prime segment;
- tax incentives for investors.

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1. The Board includes representatives of Moscow Exchange’s partners: the Central Bank of Russia, the SME Corporation, SME Bank, Industrial Development Fund, and other organizations.
ENVIRONMENT OF RESPECT AND EMPOWERMENT

Moscow Exchange Group recognizes the important role of employees in the successful achievement of its goals and its consistently high reputation on global financial markets. The Group places great emphasis on professionalism: employees are expected to successfully achieve the companies’ objectives in finance and IT. Therefore, HR strategies prioritize training and development, personal growth, well-being, and comfort in the workplace.

The Group fosters a strong corporate culture, which covers gender equality issues, labor rights, and human rights. It is continuously improving its incentive and social programs, and encourages employees to maintain good health. All employees can communicate their opinion on various matters to their employer; they can have a say in internal regulations, practices, and business processes in line with their competencies. All this helps the Group in solving tasks on an international level while building the country’s financial market infrastructure.

Key documents:
- Human Resources Policy of Moscow Exchange Group
- Internal labor regulations
- Regulation on Variable Remuneration
- Regulation on Corporate Social Support

Responsible body:
- Personnel and Human Resources Policy Department

Employee engagement and efficiency

**Key HR policy objectives**

The Human Resources Policy of Moscow Exchange Group sets the following key objectives:
- engagement, motivation, and retention of high-end professionals;
- provision of opportunities for continuing professional development;
- creation of an atmosphere facilitating realization of employees’ potential and achievement of the Group’s strategic goals.

The Supervisory Board of Moscow Exchange considers issues associated with HR management, identifies strategic objectives in this area, and monitors the achievement of corporate goals. Among the matters considered at meetings of the Supervisory Board are:
- approving key HR policy documents, including the Long-term Incentive Program;
- setting annual corporate goals that cascade down to senior management and line employees, and monitoring their fulfillment.

**Employee engagement and efficiency**

**Key HR policy objectives**

Moscow Exchange Group is strongly focused on the opinions and motivations of its employees in order to maintain a positive social climate in the workplace.

The comprehensive study of employee engagement consists of three sections:

- **Engagement**
  - An index reflecting employee motivation and the productivity of the working environment in a department

- **Loyalty**
  - An index reflecting the commitment of employees of the company

- **Satisfaction**
  - The extent to which employees are content with their work, working conditions, and the work atmosphere at the company

Each of the three components is measured based on 58 closed-ended questions and four open-ended questions (see the 2021 results in the subsection “Environment of respect and empowerment” of the section “2021 Sustainability Performance Highlights”).

The results of the study are used to develop and prioritize measures aimed at improving employee levels in these three areas. In order to prepare further actions, employee focus groups are also held.

**Employee performance reviews**

Moscow Exchange Group conducts annual performance reviews of all staff who have worked at the Group for more than three months of the reporting year. The criteria used in the reviews include both the achievement of personal targets and the completion of compulsory compliance training. Any confirmed violations of corporate requirements are also taken into account.

**Employee remuneration and motivation**

Moscow Exchange Group offers its employees competitive levels of pay, which includes fixed and variable (bonus) components. Both components are determined based on an existing system of levels of seniority (pay grades) and labor market data. The bonus portion depends on the overall performance of the Group and the employee’s individual performance.

**Employee remuneration and benefits**

Moscow Exchange strives to avoid or minimize forced redundancies; it also attempts to mitigate the impact of staff cuts on employees when multiple dismissals are objectively necessary. The minimum notice period for future operational changes at the Group’s companies is two months, in accordance with Russian law.

**Employee remuneration and benefits**

Social climate

as well as to encourage staff to have a keen interest in operating results (for more details about the specific measures taken, see the sections “Employee remuneration and motivation” and “Corporate culture”). Monitoring is carried out in the form of an annual comprehensive study of employee engagement.
Corporate culture

Moscow Exchange Group strives to develop its corporate culture based on the principles of leadership, commitment, and employee engagement.

Key corporate culture objectives:
- increasing employee engagement in implementing strategy;
- developing effective models of behavior for employees to implement business objectives at Moscow Exchange Group;
- improving the efficiency of vertical, horizontal, and cross-functional cooperation by employees.

The corporate values of Moscow Exchange Group are integrated in all key HR processes, including the internal communications system, incentive system, performance review system, and corporate training processes. In order to improve employee engagement, staff are encouraged to provide feedback (see the subsection “Social climate”).

Learning and development

The learning and development system of Moscow Exchange includes educational programs, development in the workplace, and self-study resources. Employees themselves choose what type of training they would like to engage in. Staff can use state-of-the-art technologies, corporate resources, and other tools to meet their development needs.

Evaluation of learning needs

Moscow Exchange has traditionally paid considerable attention to the quality of training, and it regularly analyzes employee competencies and experience participating in training courses and programs. This helps Moscow Exchange plan the further development of the professional development system. An NPS is included in the KPIs of the Training Unit of the Moscow Exchange.

The feedback tool is used by various business units to review communications and questions from employees. The learning and development system of Moscow Exchange is selected by the Chairman of the Executive Board.

Employee appreciation

Moscow Exchange has non-financial incentive programs in place for its employees.

As part of the Appreciation Program, an annual contest is held to identify the most active and best performing employees of Moscow Exchange, as well as the best functional and project teams. Winners are selected in five categories, and the corporate intranet is used for the voting. The winner of the “CEO’s Choice” category is selected by the Chairman of the Executive Board.

Every quarter, any Moscow Exchange employee can apply to take hard-skills training. All requests are considered and approved based on the allocated budget, provided that there is a confirmed business need for the training. The Group also conducts compulsory training sessions in soft skills for novice managers. An individual development program is created for members of the succession pool (successors to key positions).

### Type of programs

<table>
<thead>
<tr>
<th>Type of programs</th>
<th>List of programs</th>
<th>Types of employees covered by the program</th>
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<tbody>
<tr>
<td>Insurance services</td>
<td>Accident and illness insurance</td>
<td>All employees</td>
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<tr>
<td></td>
<td>Voluntary health insurance</td>
<td>All employees; they may also insure their relatives at their own expense</td>
</tr>
<tr>
<td></td>
<td>International health insurance</td>
<td>All employees; they may also insure their relatives at their own expense</td>
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<td></td>
<td>International travel insurance</td>
<td>All employees covered by voluntary health insurance</td>
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<tr>
<td>Medical services</td>
<td>Paid sick leave of up to 100% (in accordance with Russian law— up to 10 days)</td>
<td>All employees</td>
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<tr>
<td>Parental leave</td>
<td>Compensation for parental leave in accordance with Russian law</td>
<td>All employees</td>
</tr>
<tr>
<td>Maternity leave</td>
<td>Compensation of up to 100% (in excess of the statutory level established by Russian law)</td>
<td>All employees</td>
</tr>
<tr>
<td>Social programs</td>
<td>PrimeZone corporate discount program</td>
<td>All employees</td>
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</tbody>
</table>

In addition to the social package, Moscow Exchange funds the activities of a range of hobby clubs, including Moscow Exchange Smart (for the television quiz show “What? Where? When?”), a cooking club, Moscow Exchange Walk (walking tours of Moscow), and various sports groups. Because the Group supports its employees in trying to lead an active lifestyle, there is a fitness room at office of Moscow Exchange.
Within the first few months at Moscow Exchange, all employees must complete training on the Code of Professional Ethics, which also covers human rights. Completion of the training is registered in the computer system using an electronic signature.

Key documents:

- Human Resources Policy of Moscow Exchange Group
- Internal labor regulations

Responsible body:

- Personnel and Human Resources Policy Department

**Diversity and equal opportunity**

In accordance with Russian law, the principles of Conventions No. 111 and 156 of the International Labour Organization, and the Code of Professional Ethics of Moscow Exchange Group, the Group does not tolerate any form of discrimination in the workplace. Moscow Exchange Group respects all cultures, opinions, and lifestyles. It rejects all forms of harassment and discrimination based on gender, religion, way of thinking, ethnicity, nationality, physical ability, gender identity, skin color, marital status, political views, or affiliation/non-affiliation with any social group.

Moscow Exchange does not participate in any actions that could contribute to a workplace atmosphere of intimidation, hostility, abuse, or abasement of human dignity. The Group strives to provide equal employment opportunities and ensure gender equality among its staff.

The work schedule and scope of work of Moscow Exchange employees are regulated by the respective job descriptions and internal regulations, which are fully compliant with the Labor Code of the Russian Federation. Additional hours of work—or any overtime work as stipulated in the respective employment contract—require the personal consent of the employee, and such work is paid in accordance with Russian labor law.

Moscow Exchange Group has computerized the process whereby staff who work on statutory days off submit forms via the intranet; this ensures additional responsibilities are not imposed on employees. The Group also takes responsibility for ensuring health and safety of employees in the workplace.

According to the Code of Professional Ethics, hiring, filling vacancies, determining remuneration, and providing opportunities for upgrading employee skills and training are based on the professional qualities and performance metrics of individual employees. The Group has zero tolerance of any forms of favoritism.

Key documents:

- Human Resources Policy of Moscow Exchange Group
- Code of Professional Ethics of Moscow Exchange Group
- ILO Conventions Nos. 111 and 156
- UN Universal Declaration of Human Rights

Responsible body:

- Personnel and Human Resources Policy Department

**Occupational health and safety, and well-being of employees**

Moscow Exchange Group takes responsibility for the health and safety of its employees; it sets corresponding goals and objectives, and plans and funds activities to achieve them. The occupational health and safety system of Moscow Exchange conforms to the requirements of Russian law. It covers 100% of the Group’s employees. No contractors or business partners of the Group are covered. The Group also has the Occupational Health and Safety Policy, which was approved in 2018 and lays out corporate standards for occupational health and safety.

According to the Occupational Health and Safety Policy, Moscow Exchange Group assumes the following obligations:

- to comply with Russian law requirements on occupational health and safety of employees and ensure compliant working conditions;
- to provide safe working conditions through consistent and continuous activities aimed at preventing accidents, work-related injuries, and work-related ill health, including by managing professional risks;
- to inform all employees of any hazards, harmful factors, or professional risks identified in the workplace;
- to improve the occupational health and safety management system in order to ensure it meets the Group’s needs and facilitates the professional development of employees responsible for occupational health and safety;
- to provide employees with personal protective equipment, if needed;
- to involve employees (or representative bodies authorized by them) in the occupational health and safety management system and collect feedback from employees;
- to ensure the proper functioning at all levels of control over compliance with OHS regulations;
- to reinforce the personal interest of each employee in ensuring safe working conditions by increasing responsibility for compliance with OHS requirements;
- to assess working conditions regularly and monitor compliance with statutory OHS requirements, including sanitary rules imposed to combat epidemics.
Evaluation of working conditions and professional risk assessment

403-2

In accordance with internal regulations, the heads of Moscow Exchange’s business units manage OHS activities. In the event of any complaints regarding working conditions (for example, lack of light, malfunctioning ventilation or air-conditioning systems, etc.), or where any occupational health and safety violations are identified, any employee can submit a request to technical support describing the problem.

403-3

In 2020, the OHS management system underwent an external audit. The audit ascertained that the system conformed to Russian law. No audit was conducted in 2021.

Occupational health and safety training

403.7-403.9

All new employees of the Group undergo compulsory induction briefings on occupational health and safety, fire safety, civil defense, emergencies, and electrical safety. In addition, the OHS training system includes:

- an interactive video course on occupational health and safety;
- training and exams at a special study center;
- an intranet portal where employees can review all OHS instructions and regulations and undergo online training.

There is currently no approach to OHS management for the supply chain. However, Moscow Exchange soon plans to develop a Supplier Code with an integrated approach to OHS management in coordination with its business partners.

Good health and employee well-being

403-6

Moscow Exchange Group seeks to support the good health and psychological well-being of its employees.

Tips on healthy eating and living are regularly posted on the intranet. There is also a healthy food station and regular “Health Weeks”.

Fruit is provided for employees at the Group’s offices, the cafeteria offers healthy food, and vending machines feature a healthy assortment of snacks.

There is a gym for employees, with cardio machines, table tennis tables, and opportunities provided for running, swimming, volleyball, basketball, soccer, and hockey. Competitions are also held. The Moscow Exchange indoor soccer league holds a tournament every year, with teams from various investment companies and banks taking part.

In order to prevent the spread of infectious diseases, especially COVID-19, the Group’s companies take comprehensive measures to continually protect their employees. For more details, see the section “Overview of the COVID-19 response”.

Structure of corporate governance system
The corporate governance system

Moscow Exchange Group’s corporate governance system is based on Russian statutory rules and recommendations issued by the Central Bank of Russia, as well as on international best practices and standards. To improve the quality and effectiveness of corporate governance, the system is constantly being improved to align with the requirements of regulatory bodies, the opinions of shareholders and investors, and the Group’s development strategy.

The corporate governance system of Moscow Exchange Group is comprised of the following governing, auxiliary, and control bodies:

■ the General Shareholders Meeting is the supreme governing body;
■ the Supervisory Board handles general management of Moscow Exchange’s activities and strategic management;
■ the Supervisory Board committees have an advisory role; their responsibilities include preliminary consideration and formulation of recommendations to help the Supervisory Board decide crucial issues;
■ the chairman of the Executive Board and the Executive Board itself are the executive governing bodies; they govern day-to-day activities at Moscow Exchange;
■ the Internal Control and Internal Audit services oversee the effectiveness of risk management and corporate governance practices and compliance with legal requirements, corporate policies, and business processes, and also perform other functions; an independent external auditor reviews and confirms the Group’s financial reports;
■ the user committees are advisory bodies of Moscow Exchange;
■ the Corporate Governance Department and the Corporate Secretary coordinate the Exchange’s actions to protect shareholders’ rights and interests.

Moscow Exchange’s Corporate Governance Code is in force at the Group; it sets out core principles and objectives of the corporate governance system, including the principles of implementing corporate governance which are to be followed by the Group’s companies. A top-level approach to management approved at Moscow Exchange and then integrated at all companies of the Group. NCC and NSD strive to implement all requirements relevant to Moscow Exchange in their activities.

See the 2021 Annual Report of Moscow Exchange Group (p. 63) for more detailed information on Moscow Exchange’s corporate governance system and the results of its development in 2021, as well as for further information on its key governing bodies.

Key documents:

■ Federal Law No. 208-FZ dated 26 December 1995 “On Joint-Stock Companies”
■ Central Bank of Russia Corporate Governance Code
■ Listing Rules of the Moscow Exchange
■ G20/OECD Corporate Governance Principles
■ Internal policies, regulations and other bylaws, including the following:
  ■ Charter of Public Joint-Stock Company Moscow Exchange MICEX-RTS
  ■ Regulation on the Identification and Prevention of Conflicts of Interest by Public Joint-Stock Company Moscow Exchange MICEX-RTS When Acting as a Trading Organiser and Financial Platform Operator
  ■ Succession Policy for Members of the Supervisory Board of Public Joint-Stock Company Moscow Exchange MICEX-RTS
  ■ Regulation on the Stock-based Long-term Incentive Program for Key Experts of Public Joint-Stock Company Moscow Exchange MICEX-RTS

Moscow Exchange’s Corporate Governance Code of the Central Bank of Russia and best international practices, the Supervisory Board of Moscow Exchange self-assesses the effectiveness of its activities annually. In addition, an external evaluation involving an independent consultant is carried out once every three years; the next is scheduled for 2022.

Governing bodies

General Shareholders Meeting

The General Shareholders Meeting acts in accordance with Russian legislation and the Charter of Moscow Exchange.

Supervisory Board

The Supervisory Board is the main governing body of Moscow Exchange, acting in accordance with the Charter and the Regulation on the Supervisory Board of Moscow Exchange, approved by the General Shareholders Meeting. The committees under the Supervisory Board consider sustainability-related issues in accordance with their scope of authority. See the 2021 Annual Report of Moscow Exchange Group (p. 74) for further details on the work of the committees.

Supervisory Board members are elected by the General Shareholders Meeting to sit on the Board until the next Annual General Shareholders Meeting. The members of the Supervisory Board are elected by cumulative voting.

Remuneration of the Supervisory Board members

The system of remuneration of Supervisory Board members is set out in the Regulation on Remuneration and Compensation of Expenses, approved by resolution of the Annual General Shareholders Meeting. Each Supervisory Board member is paid a fixed amount, depending on

■ the Supervisory Board member’s status (compliance with the independence criteria);
■ additional functions performed (as chairman or deputy chairman of the Supervisory Board);
■ contribution to the work of the committees under the Supervisory Board (as committee chairman or member);
■ attendance at meetings of the Supervisory Board.

As per the current legislation of the Russian Federation, the “say on pay” concept is not applicable.

Executive Board

The Executive Board manages the day-to-day operations of Moscow Exchange. The chairman of the Executive Board acts on behalf of Moscow Exchange without the need for a power of attorney. He or she represents its interests, issues orders, gives instructions mandatory for all Moscow Exchange employees, and delegates certain powers.

Remuneration of Moscow Exchange executives

The system of remuneration of Moscow Exchange executives is regulated by the Policy on Remuneration and Compensation of Expenses of Executive Body Members. The policy sets out the principles of and approaches to remuneration; it establishes the procedure for determining the amount of remuneration and the types of payments, benefits, and perks granted to executive body members. Remuneration consists of a fixed and a variable component. The variable component accounts for a significant share of annual pay. There are plans to review and implement sustainability KPIs for Executive Board members. Consultants are not involved in determining remuneration.

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The system of remuneration of Moscow Exchange executives is regulated by the Policy on Remuneration and Compensation of Expenses of Executive Body Members. The policy sets out the principles of and approaches to remuneration; it establishes the procedure for determining the amount of remuneration and the types of payments, benefits, and perks granted to executive body members. Remuneration consists of a fixed and a variable component. The variable component accounts for a significant share of annual pay. There are plans to review and implement sustainability KPIs for Executive Board members. Consultants are not involved in determining remuneration.
The total amount of remuneration to be paid to Executive Board members is assessed by the Nomination and Remuneration Committee for compliance with the remuneration level at comparable companies, based on research purchased from leading consulting companies. Members of Moscow Exchange’s executive bodies are not paid remuneration for their work on the governing bodies of other companies of the Group.

See the 2021 Annual Report (p. 87, pp. 87–88) for further detail on the system of remuneration of governing body members.

Preventing conflicts of interest

In order to prevent conflicts of interest among members of the governing bodies, the Policy on Management of Conflicts of Interest and Corporate Disputes has been adopted. The key principles of this policy include:

- the requirement that members of the Supervisory Board, members of the Executive Board, and the chairman of the Executive Board notify Moscow Exchange of conflicts of interest;
- priority of the interests of Moscow Exchange and its shareholders over the personal interests of the members of Moscow Exchange’s governing bodies;
- contribution of the Supervisory Board to the prevention, identification, and settlement of corporate conflicts;
- priority participation of independent directors in preventing corporate disputes and performance of significant corporate actions by Moscow Exchange.

Management of the sustainability agenda at the departmental level is shown in the diagram.

The chairman of the Supervisory Board and independent directors are regularly invited to speak at roundtables and conferences where sustainability-related issues are discussed. There is also interaction on relevant issues at the level of government authorities.

The chairman of the Supervisory Board may receive enquiries and requests from stakeholders through the feedback form available on the corporate website. There are also informal channels for interacting with stakeholders. The members of the Supervisory Board are open to dialogue with all stakeholders, including through informal channels of communication, to process enquiries and requests and submit them to management.

**Sustainability management system**

Sustainability-related powers are distributed among the Supervisory Board, the Executive Board and the chairman of the Executive Board; this distribution is established in the Charter of Public Joint-Stock Company Moscow Exchange MOEX-RTS.

The Supervisory Board reviews sustainability reports. The decisions made at meetings are submitted to management for execution.

The Executive Board shapes Moscow Exchange’s overall sustainability agenda and is responsible for operational decisions in this area. In 2021, the Executive Board decided to form an advisory body for sustainability. The body was created under the Sustainability Roadmap; its functions include the development of goals on economic, environmental, and social aspects. The chairman of the Executive Board manages sustainability-related activities and may delegate their management to specific departments.

A list of affiliated persons is disclosed on the Moscow Exchange website to inform shareholders and other interested parties. See the corresponding report for information on interested party transactions made by Moscow Exchange in the reporting year.
Business ethics and anti-corruption

Maintaining and developing a culture of trust and responsibility is a key priority of Moscow Exchange Group’s updated strategy. The Group upholds high standards of corporate business conduct and values its reputation. In particular, Moscow Exchange adheres to the principle of zero tolerance of corruption in any form.

Key principles of the Moscow Exchange Code of Ethics:
- respect for staff and equal opportunity;
- respect for staff civil rights, including their right to freedom of speech;
- zero tolerance of corruption;
- prevention of conflicts of interest;
- combating money laundering and terrorism financing;
- countering the use of inside information;
- protection of Moscow Exchange’s assets, including intellectual property rights;
- protection of shareholders’ interests;
- non-disclosure of confidential information and protection of intellectual property rights;
- maintaining trust-based relationships with customers, partners, and government authorities;
- neutral stance towards political and religious activities (the Group’s employees are, however, welcome to engage in such activities at their own expense and as private individuals);
- corporate social responsibility and commitment to sustainability.

The Code of Professional Ethics sets out values that are fundamental to decision-making in the course of Moscow Exchange’s activities:
- openness and decency;
- continual development and openness to change;
- partnership with customers;
- responsibility for the future of the company.

Anti-corruption

To implement the zero-tolerance principle, Moscow Exchange Group takes steps to prevent corruption. These measures are aimed at both internal and external stakeholders, including informing and training staff, developing mechanisms to obtain information on events that involve the risk of corruption, and incorporating anti-corruption provisions into contracts with counterparties.

Key principles of the anti-corruption policy
- Moscow Exchange prohibits the offering/acceptance of any items of value (including gifts and incentive payments) in soliciting assistance to solve any issues.
- Moscow Exchange prohibits transactions with third parties that would act on behalf of or in the interests of Moscow Exchange.
- Moscow Exchange has corruption risk controls embedded in all aspects of its activities.

Moscow Exchange incorporates anti-corruption provisions (clauses) into contracts and vets all counterparties.

Mechanisms for reporting instances of corruption and violations of standard business practices

The Group created “SpeakUp!”, an intranet portal for reporting compliance-related issues, enabling the responsible officers to be promptly informed of possible instances of corruption and violations of standard business practices. The information reported is considered confidentially; the Group’s anti-corruption policy guarantees non-retaliation – official or otherwise – for those who report information. After processing, statistics on reports submitted via SpeakUp! are sent to the Audit Committee, and, if necessary, they are escalated to the Supervisory Board. Third parties can use the SpeakUp! function on the Group’s website.

Employees can also use SpeakUp! to get advice on ethical business conduct and anti-corruption. Moscow Exchange adheres to the open-door principle; employees can also directly contact the compliance department by phone, submit questions via a dedicated email address, and use the internal compliance portal. Information about obtaining advice on business ethics is provided to employees in the course of training on anti-corruption policies and methods.

To ensure that staff awareness of anti-corruption practices and methods remains high, Moscow Exchange Group provides information to its personnel at several levels:
1. Upon hiring, new employees undergo a brief training course and read and sign key documents.
2. Whenever the values, principles, or behavioral standards and rules of Moscow Exchange change, staff are informed accordingly through the internal portal and other means of internal communication (the corporate magazine, posters, newsletters, etc.).
3. Supervisory Board members who are not employees of Moscow Exchange Group are introduced to new values, principles, standards, and rules of conduct when approving the relevant documents.
4. The Group also runs an internal training course that is mandatory for all employees.

Approach to taxation

The approach to taxation is described in the tax strategy of Moscow Exchange Group. In its tax-related activities, the Group relies on the requirements of the tax legislation and considers effective management of tax risks to be a significant factor in increasing the Group’s value. In 2021, there were no tax disputes at the Group.

The Company values its reputation as a responsible taxpayer and strictly complies with tax laws in all jurisdictions where it does business. As a major taxpayer, the Group recognizes the importance of being a socially responsible business and strives to balance corporate, government, and public interests.

The tax strategy was developed in 2021 and approved in 2022. As of the date of this report, the tax strategy has not been made public.

The Group adheres to the following guiding principles for the tax function:
- systemic, consistent, and transparent management of tax-related issues;
- clear allocation of functions and responsibilities among the parties involved in tax relations;
- participation of the Group’s senior management in decision-making on key tax issues, as well as timely involvement of tax experts in decision-making on corporate issues;
- availability of effective tools for monitoring the implementation of decisions, including automation of key processes and procedures.

The tax strategy is approved by the Supervisory Board of Moscow Exchange. The tax strategy is revised whenever the approaches set out in the tax strategy are changed.

The Internal Audit Service (IAS) is responsible for monitoring compliance with the tax strategy and legal requirements. The tax management system is assessed by the IAS at least once a year. The approach to taxation is set out in the Group’s tax strategy.
Moscow Exchange and NCC take the following approach to tax risks:
- Tax risks are integral to the Group’s risk management and internal control system; they are identified according to the principles established by Moscow Exchange’s Supervisory Board: continuity, economic feasibility, and efficiency;
- All identified tax risks are subject to an assessment and materiality ranking;
- Tax risks are monitored quarterly through control procedures.

The fulfilment of tax obligations is subject to an annual audit procedure and is disclosed in the Group’s annual report. The latest information on the fulfilment of tax obligations is given in the 2021 Annual Report.

Supply chain management

Moscow Exchange Group emphasizes responsible supply chain management and close cooperation with suppliers of products and services in order to ensure economically efficient procurement and to mitigate relevant financial and non-financial risks. The Group has a vested interest in developing fair competition on the market and strives to cooperate with reliable and responsible suppliers.

Key principles of procurement

- Transparent procurement: any supplier may fill out a questionnaire on Moscow Exchange’s website; auctions are held on a B2B digital trading platform;
- Equality, fairness, non-discrimination, and no unreasonable competition restrictions imposed on participants in procurement: all participants, regardless of the size of their business and their country of registration, enjoy equal rights to participate if the transparency and substantive criteria are met;
- There is no additional bidding stage after the final call for bids is announced, unless there are justified changes in the terms of reference, in which case the process is treated as a new procurement;
- No provision of services by suppliers who violate Russian legislation currently in effect, including the Labor Code;
- Zero tolerance for any corrupt practices.

Key documents:
- Tax Strategy of Moscow Exchange Group
- Regulation on Procurement of Moscow Exchange
- Internal regulations on interaction between Moscow Exchange and other companies of the Group
- Procurement assurance department (organization and implementation of procurement)
- Procurement Committee (approval of purchases exceeding RUB 6 million)
- Executive Board of Moscow Exchange (approval of purchases exceeding RUB 300 million)
- Supervisory Board of Moscow Exchange (approval of purchases exceeding RUB 600 million)
TRUSTED AND RESILIENT MARKET INFRASTRUCTURE

Role of management bodies in risk management

Moscow Exchange Group has successfully established an integrated risk management system that complies with Russian regulatory requirements, as well as with leading international standards and best practices.

Key documents:
- Market operator-related risk management rules
- Financial platform operator-related risk management rules
- Declaration on Business Continuity
- Business Continuity Policy of Moscow Exchange
- Regulatory Risk Management Policy of Moscow Exchange
- Personal Data Processing Policy of Moscow Exchange
- Regulation on the Audit Committee
- Regulation on the Internal Audit Service
- Declaration on Information Security
- Policy on Information Security Management of Moscow Exchange

Responsible bodies:
- Risk Management Committee of the Supervisory Board
- Risk Management Unit
- Internal Audit Service
- Internal Control Service

ESG risk management is handled by the Supervisory Board and other management bodies, such as participants in the Group’s integrated risk management system. They perform monitoring and control procedures.

The Supervisory Board of Moscow Exchange is responsible for establishing principles and approaches of the risk management system, including approving the risk management strategy, internal documents, and policies that stipulate actions to prevent the materialization of risks and minimize their consequences.

The Risk Management Committee of the Supervisory Board reviews risk management reports and develops recommendations for managing individual risk profiles, analyzes internal procedures and proposes measures for improving them, and monitors reports submitted. Similar structures have been established within the Group’s companies, including the Risk Committee of NCC Supervisory Board and the Risk Committee of NSD Executive Board. Moscow Exchange has also created a separate business unit that is responsible for managing the risks of the market operator.

ESG risks and their potential impact on the Group’s operations are identified annually within the Group’s integrated risk management system. Risk acceptance and pre-approval of risk management issues are submitted for discussion at Supervisory Board meetings. The Executive Board is responsible for defining an acceptable level of risk.

The Group has been conducting regular training sessions for its employees to improve their risk identification skills. The sessions are part of the Risk Management System Development Strategy. Risk-management-related KPIs are included in the criteria used by management for assessing employee performance.

Key risk profile

Each of the Group’s companies faces different types of risk, depending on the specific nature of their activities. As the parent company of the Group, Moscow Exchange faces risks associated with the organization of trading, as well as with transactions involving its own assets. NSD, as a core element of Russia’s financial market infrastructure, faces risks in its depository activities. The key risk bearer in the Group is NCC, which acts as a clearing house and central counterparty for all major markets of the Group, and as a commodity delivery facility for the commodities market.

The Group’s financial and non-financial risk map is updated annually following the results of the risk identification procedure. Non-financial risks are classed into several categories, as described in the table below.

<table>
<thead>
<tr>
<th>Key</th>
<th>Medium</th>
</tr>
</thead>
<tbody>
<tr>
<td>Risk</td>
<td>Description</td>
</tr>
<tr>
<td>Strategic risk</td>
<td>Risk of expenses (losses) resulting from (1) erroneous assumptions made by management in preparing, approving and executing strategic plans; (2) inadequate execution of decisions made by management; (3) the impact of changes caused by external factors and that affect or could affect the Group’s performance</td>
</tr>
<tr>
<td>Significance</td>
<td>High</td>
</tr>
</tbody>
</table>

Detailed information on risk management is presented in the 2021 Annual Report.
Significance

Information security Risk

Risk of losses due to failure to comply with legislation, internal regulations and standards issued by self-regulatory organizations (if such standards and rules are obligatory) or as a result of sanctions and other enforcement measures taken by oversight agencies.

Risk management activities

- Monitoring legislative developments;
- Coordinating with regulatory authorities on the development of new regulations;
- Identifying regulatory risk in existing and proposed internal procedures;
- Analyzing best practices in internal control;
- Obtaining preliminary approval and performing background checks when onboardling clients, signing contracts with counterparties, admitting securities to trade, launching new products or services, etc.;
- Setting up automated controls, including controls to run parties (stakeholders) through compliance checklists;
- Ensuring that the necessary policies and procedures are in place;
- Conducting mandatory training.

The Internal Control and Compliance Department is responsible for managing compliance risk.

Reputational risk

Risk of expenses (losses) or any other adverse effects resulting from a negative perception of Moscow Exchange Group by its counterparties, traders and their clients, shareholders, the Central Bank of Russia, and others, which may adversely impact the Group’s ability to maintain its existing relationships and/or to establish new ones and provide access to sources of financing on an ongoing basis.

Risk management activities

- Collecting and analyzing coverage of Moscow Exchange Group in the media;
- Regular analysis of information that may pose a reputational risk which has been obtained from media and other sources, including analysis of the impact of reputational factors on Moscow Exchange’s financial position, the impact of the reputation of other Group companies on the Group’s reputation, and the impact of Moscow Exchange Group’s corporate charitable and marketing activities on its business reputation;
- Performing ongoing assessments and monitoring of PR through regular assessment of Moscow Exchange’s performance, and monitoring the number of complaints and claims from clients and counterparties, and positive and negative coverage of shareholders and related parties in the media;
- Regularly monitoring the business reputation of shareholders, related parties, and management;
- Overseeing the fair presentation of information in the financial statements and any other published information provided to shareholders, clients and counterparties, regulatory and oversight bodies, and other stakeholders, including for advertising or promotional purposes;
- Preventing persons with access to certain information from using that information for their personal benefit;
- Providing management and employees with data on negative and positive coverage about Moscow Exchange Group in the media and other sources, and considering and analyzing the completeness, credibility and objectivity of such information in a timely manner;
- Taking disciplinary action against employees whose misconduct may have created a risk of damaging Moscow Exchange Group’s reputation.

Risk

Description

Risk management activities

Compliance risk

Significance

Risk of the security (confidentiality, integrity, accessibility) of information assets being compromised as a result of the materialization of information security threats.

Risk management activities

- Ensuring the accessibility, integrity and efficient use of information assets;
- Ensuring information confidentiality and preventing harm from the disclosure of confidential information, including personal data;
- Building an effective system for monitoring and protecting the Group’s information infrastructure;
- Increasing protection and optimizing the cost of ensuring information security via a risk-based approach;
- Raising awareness of information security risks among Group employees;

Information security Risk

Risk of expenses (losses) incurred by MOEX Group as a result of the lack of alignment between HR policy and business objectives, as well as the significant loss of key personnel or expertise.

Risk management activities

- Review of the parameters of the long-term incentive program for key management of the Group;
- Management of the performance evaluation system and review of the compensation structure;
- Revision of the ratio between remuneration components.
- Employee engagement surveys;
- Annual planned training program for mid-level managers;
- Succession planning;
- Cross-functional internship program;
- Internal coaching program;
- Talent management program to identify high-potential employees and facilitate their individual development.

Climate risks

TCFD

Risk of financial losses as a result of reduced demand for listing services and investment prospects of issuers in a number of industries; physical damage or loss of property, as well as malfunctions in equipment and in the availability of services to clients; additional expenditures due to regulatory changes and the need to introduce new technologies, which may adversely affect the Group companies’ revenue and reputation

Risk management activities

- Technological, information and organizational solutions for the protection of equipment and data;
- Diversification of financial risk hedging instruments;
- Introduction of ESG requirements in listing rules for issuers;
- Development and implementation of a greenhouse gas emissions accounting system by the Group’s organizations.

For more information on climate-related risk management, see the Climate Agenda-related risk management section.

Risks and opportunities of algorithmic trading systems

FNE-EX-410a.2

The Group successfully operates infrastructure and implements a set of measures to manage the risks and opportunities associated with high-frequency trading.

Risk

Description

Risk mitigation measures

Capacity risk

Setting technical and regulatory limits on the number of transactions generated in the system per user per period of time

Risk of DDoS attacks that may affect the ability of the IT infrastructure to adequately process transactions

Providing a backup channel and other standard means of protection of information security

The Group has added co-location, which provides market participants with high-quality service, and also gives the Group additional revenue opportunities.

The set of measures used to manage the risks and opportunities of algorithmic trading systems includes:

- Accreditation of all automated trading systems after a test at the test site;
- Monitoring of login activity, which is halted if the limit is exceeded;
- Price boundaries that control flash crashes in the market if the algorithm or the participant makes an error;
- Fees for excessive transactions that do not result in deals;
- Canceling on disconnect services to drop a bid in the event of loss of communication with the participant.
Internal audit and internal control

Moscow Exchange’s risk management system is based on the COSO principles and structured on the ‘three lines of defense’ model, which stipulates that risk management and internal control responsibilities be distributed among management bodies, business units responsible for control and coordination, and the internal audit function. The Group continues to improve its internal control system to maintain a high level of performance.

COSO Internal Control System

<table>
<thead>
<tr>
<th>Line of defense</th>
<th>Responsibility</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>First line of defense</td>
<td>Identifying, assessing and managing risks, developing and implementing policies and procedures governing business processes</td>
<td>All business function staff and employees of the operating units of Moscow Exchange</td>
</tr>
<tr>
<td>Second line of defense</td>
<td>Ongoing risk monitoring and risk management by units as part of their functions.</td>
<td>Operational Risk, Informational Security, and Business Continuity Department</td>
</tr>
<tr>
<td></td>
<td>Infrastructure resilience issues include:</td>
<td>Internal Control and Compliance Department</td>
</tr>
<tr>
<td></td>
<td>Information security</td>
<td>Internal Control Service</td>
</tr>
<tr>
<td></td>
<td>Compliance with legislation and internal documents</td>
<td>Security Department</td>
</tr>
<tr>
<td></td>
<td>Prevention of corruption and unlawful and fraudulent activities</td>
<td>Legal Department</td>
</tr>
<tr>
<td></td>
<td>Prevention of improper use of inside information and/or market manipulation</td>
<td>Designated employees and departments of the Finance Unit</td>
</tr>
<tr>
<td></td>
<td>Prevention of conflicts of interest</td>
<td></td>
</tr>
<tr>
<td>Third line of defense</td>
<td>Overseeing the efficiency of business activities, the management of assets and liabilities, and the effectiveness of the risk management system</td>
<td>Internal Audit Service</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Management bodies of Moscow Exchange</td>
</tr>
</tbody>
</table>

Compliance with international standards

103.3

The Group conducts an annual audit of its compliance with the CPMI-IOSCO Principles for Financial Market Infrastructures, the COSO Enterprise Risk Management Framework, and the Basel Committee on Banking Supervision risk management guidelines.

In 2020, NCC successfully underwent an operational audit by PwC (an international audit and consulting company) to check compliance with the requirements of the Central Bank of Russia. The audit covered the following components: management of risks of the central counterparty, assessment of the accuracy of the central counterparty model, stress-testing of risks of the central counterparty, determination of the allocated capital of the central counterparty, and recovery of financial stability of the central counterparty. The operational audit is conducted every two years, and the most recent was conducted in March 2022.

NCC also undergoes a certification audit every three years in accordance with ISO 9001 Quality management systems (the most recent audit was conducted in 2019).

Disclosure

Information Policy

103.2

As a market operator, Moscow Exchange applies a transparent investor- and bidder-oriented information policy regarding its activities. This ensures that stakeholders can exercise their rights to reliable information to the fullest possible extent. As per the information policy, the purpose of disclosing information about Moscow Exchange as an issuer of securities is to reach all stakeholders so that they can make balanced decisions on holding Moscow Exchange equity or performing other actions.

Moscow Exchange complies with the following principles of disclosure regarding its activities:

- regularity and promptness of reporting;
- availability for stakeholders, reliability and completeness of disclosures;
- neutrality, namely the avoidance of prioritizing certain groups of recipients over others;
- accountability for information disclosure.

Moscow Exchange does not evade disclosure of adverse information if such information is material for shareholders and other stakeholders.

Disclosure at the request of government agencies

Moscow Exchange Group is obliged under Russian law to disclose information on market participants (issuers and bidders) to competent government agencies, including law enforcement agencies, for the prevention or investigation of potentially unlawful activities. Such disclosures may cover insider trading, market manipulation (Federal Law No. 224), and anti-money laundering (Federal Law No. 115).

Information security

105.2 PN-EX-550a.3

Information security (IS) means the protection of information and the equipment used to process it from accidental or deliberate interference, whether natural or artificial.

The main goal of ensuring IS is to appropriately protect the company’s business processes, as well as to minimize IS risks when organizing trading and clearing services, and when providing services on the Equity, Derivatives, FX, and Money Markets.

This goal is achieved by ensuring and continuously maintaining the confidentiality, integrity and accessibility of the company’s protected information assets.

Key documents:

- Declaration on Information Security
- Personal Data Processing Policy of Moscow Exchange
- Information Security Strategy

Responsible bodies:

- Operating Risk, Information Security, and Business Continuity Department
- Technical Policy Committee

Moscow Exchange has implemented an information security management system that meets the requirements of Russian law and complies with ISO 27001. Organizational and technical activities are continuously conducted to ensure information security and manage IT infrastructure and information security incidents. The Security Operations Center is responsible for monitoring and responding to information security incidents. The Group regularly conducts information security audits, intrusion tests, and anti-phishing tests to manage risks. To protect against malicious attacks, Moscow Exchange uses its own equipment or a provider’s.
In October 2021, following an independent audit, the Group underwent recertification for compliance with ISO 27001:2013 (Information technologies. Security techniques. Information security management systems. Requirements) and ISO 22301:2012 (Societal security. Business continuity management systems. Requirements). This certification is voluntary and covers 100 measures aimed at ensuring information security and business continuity.

Employees are required to comply with information security measures and are provided with training and information, including the following activities:
- including employees’ compliance with information security requirements in KPIs;
- online training on information security, and introductory briefings during onboarding;
- regular newsletters on information security and protection of confidential information;
- workshops on preventing phishing attacks.

### Technology development

The implementation of technology development processes at Moscow Exchange Group is regulated under the Group’s Information Technology Development Strategy. IT systems are regularly updated with new products and services, and new platform solutions are developed and implemented. The Development Strategy focuses on:
- implementing business and technology initiatives;
- accelerating the incorporation of new technologies while maintaining reliability;
- creating an innovative IT environment;
- boosting synergy within the Group;
- implementing an IT management model;
- controlling cost-effectiveness.

Uninterrupted and fault-tolerant systems are supported by “hot” and “warm” back-up technology that facilitates rapid restoration of the trading and clearing systems in case of failure. Server equipment that performs critical trading and clearing operations is no more than three years old, while network equipment is no more than five years old and is regularly upgraded by installing the most up-to-date models. With due consideration for targets for reduced energy consumption, older and less energy-efficient servers are taken out of service.

### Privacy of personal data

The principles, terms and measures that ensure the security of personal data processing are set out in the Personal Data Processing Policy of Moscow Exchange.

Moscow Exchange Group conducts regular human rights risk assessments associated with data privacy. To assess this risk, the Group uses its own risk appetite methodology for assessing risk appetite. Moscow Exchange discloses the process for evaluating and responding to law enforcement or government data requests in accordance with Russian law.

All employees can express their concerns regarding the handling of personal data via the Speak Up! hotline. The Group companies consider the concerns raised and take appropriate action.

### Market access and customer experience

Moscow Exchange offers its clients information and technology services that provide real-time market data, as well as information on trading results and indices.

It works to increase the appeal of its services on organizing trade on the commodity and financial markets for investors and issuers.

#### Key documents:
- Listing Rules of Moscow Exchange
- Clearing Rules of the National Clearing Center (JSC) for the Equity and Bond Markets
- Clearing documents of the JSC National Settlement Depository

#### Responsible departments:
- Customer Service Department
- Customer Support Department
- Technical Access Department

Moscow Exchange’s technology infrastructure provides market participants with a safe and reliable environment that supports uninterrupted trading, clearing, and settlement operations. Reliability is ensured by the following factors:
- high-quality risk management;
- capitalized central counterparty and settlement infrastructure;
- high standards of listing and information disclosure by issuers.

Moscow Exchange spares no efforts to ensure convenience for its customers:
- develops new products, services, and ways of trading;
- extends trading hours;
- implements new technologies for access to trading and market data;
- strengthens cooperation with other markets and exchanges.

### To continue developing Moscow Exchange as a trusted market participant, the Group has set the following objectives:

<table>
<thead>
<tr>
<th>Category</th>
<th>Key objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Providing additional world-class exchange services beyond traditional exchange products</td>
<td>Offer a wider range of exchange products and services beyond those currently available on traditional exchange markets (stocks, bonds and derivatives).</td>
</tr>
<tr>
<td>Creation of uniform infrastructure for the entire Russian market, including traditional over-the-counter segments, based on a single set of post-trading services with integrated settlement, collateral and risk management systems.</td>
<td>Continue to enhance access for market participants and their customers to global OTC markets, offer better prices thanks to the exchange infrastructure, and further expand new tailored mechanisms for liquidity taken/ made that are recognized globally among OTC FX platforms.</td>
</tr>
<tr>
<td>Ensuring the operational reliability of depositary and clearing services.</td>
<td>Develop a market for standardized derivative financial instruments with centralized clearing, and make it easier for market participants to sign long-term derivatives contracts.</td>
</tr>
<tr>
<td>Ensuring the uninterrupted operation of trading and information systems as well as prompt response to any potential disruption.</td>
<td>Develop the Finline.ru personal finance platform for retail investors, a one-stop shop for all financial products and services offered on the market (for more details, see “2021 Sustainability Performance Highlights: Responsible investing and sustainable growth”).</td>
</tr>
<tr>
<td>Implement measures to mitigate dependence on services provided by foreign vendors to better manage sanctions-related technological risk and account for macro-political factors.</td>
<td>Develop a single marketplace interface for corporate clients, including a wide range of treasury services (asset and liability management) and division of services by trading, clearing and settlement.</td>
</tr>
</tbody>
</table>
**Environmental efficiency**

Moscow Exchange Group hosts annual events to reduce negative impacts on the environment. In its operations, the Group is guided by the laws and regulations of the Russian Federation as well as corporate standards that ensure compliance with environmental requirements.

**Energy efficiency**

The Group’s companies have an extensive network of server and computer equipment across two data centers. Therefore, improvements in energy efficiency are largely dependent on timely upgrades to the Group’s equipment and the use of IT technologies to transmit information.  

Key documents:
- Russian environmental legislation and standards
- Waste Generation Standards and Waste Disposal Limits approved by the Moscow Department of Resource Management and Environmental Protection up to February 2023
- Moscow Exchange Environmental Monitoring and Industrial Control Program

Responsible bodies:
- Administrative Department of Moscow Exchange

Modern equipment consumes less energy: each new generation of servers is about 2–3% more efficient than the previous one. The Moscow Exchange Technology Policy sets timelines for upgrades of server equipment.

One of the Group’s key server equipment suppliers is Hewlett Packard Enterprise; its products are leaders in server efficiency, including energy efficiency. They comply with international environmental standards, including the Electronic Product Environmental Assessment Tool (EPEAT), Energy Star, and the China Energy Conservation Program (CECP).

To reduce electricity consumption in our offices outside of business hours, hallway lighting systems, ventilation systems and office air-conditioning systems are automatically turned off. In winter, cold air from outside is used to cool server rooms.

**Climate change impact**

Direct GHG emissions are emitted by the Group’s corporate vehicles and the back-up diesel generators used to create electricity in case of emergency outages on the part of the supplier. Indirect emissions stem from the use of electricity and heat purchased from energy suppliers.

The Group’s modern fleet of vehicles is key to reducing direct GHG emissions: most of the corporate vehicles were manufactured after 2014, and all of them have engines with an environmental classification of IV or V. Measures aimed at reducing indirect emissions are described in the subsection “Energy efficiency”.

**Water consumption and waste water disposal**

Moscow Exchange Group strives to improve the efficiency of water consumption at its offices.

The Group receives water only from municipal water systems. Wastewater (including from storm drains) is discharged only to municipal sewage systems, where it is treated in accordance with applicable regulations. No wastewater is discharged into bodies of water or natural habitats designated as nationally or internationally protected areas. The Group does not operate in regions affected by water scarcity.

**Waste management**

The activities of Moscow Exchange Group generate office waste (paper, non-industrial waste, fluorescent lamps, etc.), as well as e-waste and waste associated with the vehicle fleet. The Group aims to reduce its office waste and increase the share of recyclable waste. For this purpose, the Group has taken the following measures:
- Introduction of electronic document management to reduce the generation of paper waste;
- Collection and disposal of used batteries;
- Use of bins for separate collection and disposal of non-industrial waste.

After planned replacement of office computer hardware, Moscow Exchange promotes its continued use by offering it to employees or donating it to schools and orphanages.

E-waste is transferred to specialized contractors for further disposal.

The waste generated by Moscow Exchange Group does not directly affect any nationally or internationally protected areas.
APPENDIX 1. MOSCOW EXCHANGE’S CONTRIBUTION TO THE UN SDGS

Recognizing the importance of the 2030 Agenda for Sustainable Development, Moscow Exchange Group strives to contribute to meeting the UN SDGs to address socioeconomic and environmental challenges.

UNDERSTANDING THE CONTRIBUTION TO THE UN SDGS

In 2020, Moscow Exchange conducted an analysis of all 17 UN SDGs and the 169 targets related to each one. Based on these findings, Moscow Exchange identified seven priority Goals and set its corporate objectives with consideration for the specifics of the Group’s activities and the objectives of the UN SDGs.

A range of projects was defined for each corporate objective, and metrics were developed to assess the Group’s contribution to meeting the UN SDGs.

Quality Education (SDG 4)

Moscow Exchange Group’s ESG strategy includes two areas corresponding to this goal:
- projects for novice investors, entrepreneurs, and a wide range of people who would like to learn to effectively manage their finances (for example, a project to promote financial and investment literacy);
- corporate training programs for staff.

In 2021, Moscow Exchange held the annual Ring the Bell for Financial Literacy event in a bid to promote wider financial literacy. It was a great opportunity to bring all stakeholders together and celebrate the progress made by each participant. Moscow Exchange also develops and offers new educational products each year.

Read more about this in the subsection “Genuine partnership and engagement with the community” of the section “2021 Sustainability Performance Highlights”.

Decent Work and Economic Growth (SDG 8)

The companies of the Group have succeeded in creating appealing working conditions for staff. Meanwhile, senior management places a strong emphasis on occupational health and safety, fair pay, and rewarding employees for their achievements.

The Company cares about the comfort and success of its employees, providing them with extended VMI and healthy lifestyle program memberships. Moscow Exchange finances a number of hobby clubs, including MOEX Smart, a cooking club, MOEX Walk, and various sports teams. In addition, the Group keeps expanding its social and educational programs. Since 2020, Moscow Exchange has been providing sustainability training for employees in their main areas of activity.

The Group also promotes access to finance for small and medium-sized enterprises, which helps create new jobs in this sector. The number of SMEs that have gone public on Moscow Exchange increased from three in 2018 to 28 in 2021.

Read more about this in the subsections “Environment of respect and empowerment” and “Responsible investing and sustainable growth of the section “2021 Sustainability Performance Highlights”.

Industry, Innovation, and Infrastructure (SDG 9)

Responsible financing is one of the Group’s strategic priorities in the field of sustainable development. Moscow Exchange takes global trends and changes in capital markets into account in building an economy that will be more sustainable over the long term. This main objective of the ESG strategy is the Group’s contribution to SDGs 9, 12, and 13.

Moscow Exchange creates favorable conditions for attracting capital not only to SMES, but also to innovative startups. The number of innovative companies that have gone public on Moscow Exchange increased from three in 2018 to 28 in 2021.

The Group also promotes access to finance for small and medium-sized enterprises, which helps create new jobs in this sector. The number of SMEs that have gone public on Moscow Exchange increased from three in 2018 to 28 in 2021.

Read more about this in the subsections “Environment of respect and empowerment” and “Responsible investing and sustainable growth of the section “2021 Sustainability Performance Highlights”.

Gender Equality (SDG 5)

A large part of Moscow Exchange’s HR policy is attracting highly qualified employees, tapping into their potential, and ensuring high motivation and engagement. The Group companies monitor gender balance using a number of indicators, including the staff structure. They have achieved stable male/female parity indicators (56.7%/43.3%) among the workforce; the share of women in leadership positions (36% of department heads) is also relatively high. This attests to the Group’s adherence to gender equality principles.

Read more about this in the subsection “Environment of respect and empowerment” of the section “2021 Sustainability Performance Highlights”.

For employees who have undergone training.
In December 2021, Moscow Exchange leveraged Finuslugi.ru personal financial services platform to introduce the first service for buying and selling retail bonds issued by Russian regions.

In addition to its range of sustainable products, Moscow Exchange has spent years building a solid, secure IT infrastructure. The results are impressive: zero breaches resulting in leakage of personal data, zero financial losses from information security failures, and zero outages of the information system.

Read more about this in the subsection “Responsible investing and sustainable growth” of the section “2021 Sustainability Performance Highlights.”

Responsible Consumption and Production (SDG 12)

The Group does its best to reduce its own environmental footprint by implementing climate and environmental programs at its offices and data centers, as well as by introducing responsible investment practices. Moscow Exchange’s activities include implementing responsible investment instruments, helping improve the quality and quantity of ESG-related disclosure by issuers, and promoting companies’ awareness of sustainability trends.

Read more about this in the subsections “Resource efficiency and environmental impact” and “Responsible investing and sustainable growth” of the section “2021 Sustainability Performance Highlights.”

Climate Action (SDG 13)

Moscow Exchange Group’s ESG strategy includes three areas that correspond to this goal:

- reducing its own climate footprint and participating in the creation of market instruments;
- facilitating the transition to a circular, low-carbon economy through green finance, and creating new exchange-traded environmental products and services;
- procuring goods, work, and services with the best environmental characteristics.

By following the roadmap and introducing new energy-saving measures annually, the Group’s companies reduced energy intensity by 21% (1.46 GJ/RUB million in 2021 compared to 1.85 GJ/RUB million in 2019); the intensity of electricity consumption by data centers also shrank 10% compared to 2019.

A key milestone of Moscow Exchange in 2021 was the transition to the use of green power generated at the Ulyanovsk wind farm. In early 2022, Moscow Exchange entered into an additional commission agreement for the supply of green energy to the DataSpace data center. The supply of green power in 2022 is expected to cover over 90% of Moscow Exchange’s consumption. The use of renewable energy sources by Moscow Exchange is consistent with sustainability best practices.

Moscow Exchange spent the past two years conducting a climate risk scenario analysis, and in 2021 it developed measures for each scenario to reduce its climate footprint and better adapt to climate change. Following the TCFD recommendations, the Group identified two significant types of risk: physical and transition-related. Moscow Exchange assessed climate risks for five types of risks: market, political/legal, reputational, physical, and technological. A financial estimate will be calculated for all risks within each type, and events of low and high probability will be identified. The Group is currently working on climate-related goals and metrics, aiming to approve them in 2022.

Read more about this in the subsections “Climate agenda” and “Responsible investing and sustainable growth” of the section “2021 Sustainability Performance Highlights.”

Partnerships for the Goals (SDG 17)

Moscow Exchange supports international and industry initiatives aimed at cooperation on sustainability issues.

Read more about this in the subsection “Genuine partnership and engagement with the community” of the section “2021 Sustainability Performance Highlights.”

SDG 4: Quality Education

<table>
<thead>
<tr>
<th>UN SDGs</th>
<th>Moscow Exchange Group’s corporate objectives matching the UN SDGs</th>
<th>Key projects of Moscow Exchange Group</th>
<th>Metric</th>
<th>2021 results</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.3</td>
<td>Promote financial literacy</td>
<td>Investment and financial literacy program</td>
<td>Number of participants in events to promote financial literacy, organized by Moscow Exchange</td>
<td>-1,031,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ring the Bell for Financial Literacy annual event</td>
<td>Number of registered individuals who use two or more Moscow Exchange markets</td>
<td>2,806,373</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Ring the Bell for Financial Literacy annual event</td>
<td>Held in 2021</td>
</tr>
<tr>
<td>4.4</td>
<td>Develop staff professional and technical skills</td>
<td>Training courses in hard skills and events to develop the IT community</td>
<td>Total time allocated for employee training, hours</td>
<td>46,644</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Average training time per employee, hours</td>
<td>19</td>
</tr>
<tr>
<td>4.7</td>
<td>Build employee competencies needed for effective sustainability management within the Company</td>
<td>Sustainability management training courses</td>
<td>Employees in the relevant departments who have undergone training in sustainability management, % of total number of staff</td>
<td>10</td>
</tr>
</tbody>
</table>

SDG 5: Gender Equality

<table>
<thead>
<tr>
<th>UN SDGs</th>
<th>Moscow Exchange Group’s corporate objectives matching the UN SDGs</th>
<th>Key projects of Moscow Exchange Group</th>
<th>Metric</th>
<th>2021 data</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.5</td>
<td>Ensure gender balance at the Company</td>
<td>An employee survey to identify any forms of discrimination. The findings will be used in developing inclusiveness and sociocultural diversity. It is planned to scale the survey up to cover issuers</td>
<td>Staff structure by gender, category, employment type, and employment contract type</td>
<td>By gender:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>male: 56.7%;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>female: 43.3%;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>By category:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>senior executives:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>– male: 77%;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>– female: 23%;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>department heads:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>– male: 64%;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>– female: 36%;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>By employment type:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>full-time employment: 96.7%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>part-time employment: 3.3%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>permanent contract: 94.5%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>fixed-term contract: 5.5%</td>
</tr>
</tbody>
</table>

Based on the total number of employees at the end of the year.
### SDG 8: Decent Work and Economic Growth

<table>
<thead>
<tr>
<th>UN SDGs</th>
<th>Moscow Exchange Group’s corporate objectives matching the UN SDGs</th>
<th>Key projects of Moscow Exchange Group</th>
<th>Metric</th>
<th>2021 data</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.5</td>
<td>Improve working conditions for staff</td>
<td>Engagement and satisfaction research</td>
<td>Dream</td>
<td>Held in 2021.</td>
</tr>
<tr>
<td>8.6</td>
<td>Promote staff engagement</td>
<td>Salary policy</td>
<td>Smooth</td>
<td>86.2: Involvement level 87.9: Satisfaction level</td>
</tr>
<tr>
<td>8.7</td>
<td>Promote gender balance in the workplace environment</td>
<td>Gender equality matters are featured in the Sustainable Development Guide for issuers, developed in 2021.</td>
<td>Performance</td>
<td>Ring the Bell for Gender Equality annual event</td>
</tr>
<tr>
<td>8.8</td>
<td>Develop the exchange partnerships for small and medium-sized enterprises (SMEs)</td>
<td>Number of SMEs placing securities in the Growth Sector</td>
<td>Performance</td>
<td>16 issues/16 issuers</td>
</tr>
<tr>
<td>8.10</td>
<td>Develop the exchange infrastructure for access to capital markets, promote development of the local investor base</td>
<td>Trading volume, RUB billion</td>
<td>Performance</td>
<td>RUB 12.5 billion: bonds</td>
</tr>
</tbody>
</table>

### SDG 9: Industry, Innovation, and Infrastructure

<table>
<thead>
<tr>
<th>UN SDGs</th>
<th>Moscow Exchange Group’s corporate objectives matching the UN SDGs</th>
<th>Key projects of Moscow Exchange Group</th>
<th>Metric</th>
<th>2021 data</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.3</td>
<td>Expand growth opportunities and improve access to finance for small and medium-sized enterprises (SMEs)</td>
<td>Growth sector</td>
<td>Performance</td>
<td>Number of SMEs placing securities in the Growth Sector</td>
</tr>
<tr>
<td>9.1</td>
<td>Increase access to financial services for individuals</td>
<td></td>
<td>Performance</td>
<td>Number of products developed/ adapted for individuals</td>
</tr>
<tr>
<td>9.0</td>
<td>Ensure sustainability of financial infrastructure</td>
<td>Information security programs</td>
<td>Performance</td>
<td>Number of operational risk events</td>
</tr>
</tbody>
</table>

### SDG 12: Responsible Consumption and Production

### SDG 13: Climate Action

<table>
<thead>
<tr>
<th>UN SDGs</th>
<th>Moscow Exchange Group’s corporate objectives matching the UN SDGs</th>
<th>Key projects of Moscow Exchange Group</th>
<th>Metric</th>
<th>2021 data</th>
</tr>
</thead>
<tbody>
<tr>
<td>12.4</td>
<td>Do not exceed the current office greenhouse gas emission intensity and strive to reduce it</td>
<td>Measures to reduce greenhouse gas emissions</td>
<td>Performance</td>
<td>Greenhouse gas emission intensity (Scopes 1, 2), t CO₂/person</td>
</tr>
<tr>
<td>13.1</td>
<td>Reduce office water consumption intensity and strive to reduce it</td>
<td>Measures to reduce water consumption</td>
<td>Performance</td>
<td>Office water consumption intensity, m³/person</td>
</tr>
<tr>
<td>12.4</td>
<td>Reduce office water consumption intensity and strive to reduce it</td>
<td>Measures to reduce water consumption</td>
<td>Performance</td>
<td>Water consumption intensity, m³/RUB million in revenue</td>
</tr>
</tbody>
</table>
APPENDIX 2. STATEMENTS

STATEMENT OF MOSCOW EXCHANGE GROUP ON COMMUNICATION WITH STAKEHOLDERS AS PART OF THE SUSTAINABLE STOCK EXCHANGES INITIATIVE

The following report has been compiled in accordance with the recommendations of the Sustainable Stock Exchanges (SSE) initiative.1

Business strategy

1 How does your exchange define and view the rationale for corporate sustainability and the exchange’s role in promoting it?

Moscow Exchange recognizes the importance of sustainable development, including the growing importance of non-financial risks and ESG investing for companies. Moscow Exchange aims to improve efficiency in environmental, social and corporate governance in cooperation with investors, companies (issuers), regulatory authorities, and relevant international organizations. It also promotes sustainable investment, including the financing of the UN Sustainable Development Goals.

As a platform for the circulation of financial capital, Moscow Exchange primarily promotes corporate sustainability by disseminating knowledge about sustainability principles, advising issuers on the disclosure of ESG information in their reporting, and promoting constructive dialogue on responsible investment with its stakeholders.

2 How does your exchange’s senior leadership and organizational structure support the promotion of corporate sustainability in its market(s)?

Corporate sustainability issues are addressed at meetings of the Supervisory Board of Moscow Exchange, and they are reflected in its decisions.

In 2021, the Supervisory Board discussed challenges associated with reducing greenhouse gas emissions and creating infrastructure for carbon accounting and trading in Russia. These meetings led to the Supervisory Board approving a new project for Moscow Exchange in this area.

The 2024 Group Strategy, approved by the Supervisory Board, continues to be implemented in 2021. Sustainability initiatives, including responsible investment and the promotion of ESG practices on financial markets, are integrated into the Group’s strategic objectives. As part of this initiative, in 2021 the Group developed and promoted a guide for issuing companies on how to integrate ESG principles into their activities.

3 What goals/objectives does your exchange have in regards to advancing sustainability in your market?

Moscow Exchange conducted an in-depth analysis of the 17 UN SDGs and prioritized seven of them in relation to which it can make the greatest contribution. In addition, Moscow Exchange has set corporate objectives for each of the prioritized UN SDGs.

As part of the “Responsible Investment” initiative, Moscow Exchange has set the following corporate objectives, which correspond to UN SDG 12.6 (“Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate information on sustainable development into their reporting cycle”):

- Raise companies’ awareness of trends, standards, and practices in sustainable development;
- Develop tools for applying the principles for responsible investment;
- Improve the quality and quantity of ESG information disclosed by issuing companies.

Detailed information is given in this Report in the statement “Moscow Exchange’s Contribution to the UN SDGs”.

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1 The ESOS is the Sustainable Stock Exchanges Initiative, an international UN partnership program organized as part of the United Nations Conference on Trade and Development (UNCTAD), the UN Global Compact, the United Nations Environment Programme Finance Initiative (UNEP FI), and the United Nations Principles for Responsible Investment (PRI).

APPENDIX 2. STATEMENTS

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The National Projects of Russia have been developed in accordance with Decree of the President of the Russian Federation No 204 “On National Goals and Strategic Objectives of the Development of the Russian Federation to the Year 2024” of 7 May 2018.

In 2021, Moscow Exchange launched a project in partnership with a major Russian bank to create a Russian Carbon Market.

In 2021, Moscow Exchange did not penalize companies for failing to disclose sustainability information.

Moscow Exchange continuously interacts with stakeholders in order to gain a comprehensive understanding of the context of the organizations’ activities and the results of their decision-making.

Moscow Exchange regularly conducts educational and other events to encourage the disclosure of corporate non-financial information.

Amendments to listing standards are developed in close cooperation with market participants and the Central Bank of Russia. After such amendments are drafted, the new listing rules are reviewed by committees of Moscow Exchange and approved by the Supervisory Board. Market participants and other stakeholders take part in the work of the committees. Finally, the amendments are submitted to the supervisory authorities of the Russian Federation for registration.

Detailed information is available in this Report in the subsection “Responsible investing and sustainable growth” of the section “2021 Sustainability Performance Highlights”.

In 2021, Moscow Exchange created the guide “How to Comply with Best Practices in Sustainable Development”, published in 2021, in cooperation with the expert community, stakeholders (including issuing companies), and partners such as Deloitte, EY, KPMG, PwC, PR, Citigate Dewe Rogerson, and Zebra Corporate Communications.

Moscow Exchange monitors trends in sustainability disclosure and organizes events dedicated to corporate reporting. Recently, Moscow Exchange, together with UN PRI, SASB, and several other organizations, held a number of events dedicated to the disclosure of non-financial information.

In 2021, Moscow Exchange published the guide “How to Comply with Best Practices in Sustainable Development”, which it developed in cooperation with the expert community. Companies can use the guide to develop their corporate sustainability reporting practices.

Amendments to listing standards are developed in close cooperation with market participants and the Central Bank of Russia. After such amendments are drafted, the new listing rules are reviewed by committees of Moscow Exchange and approved by the Supervisory Board. Market participants and other stakeholders take part in the work of the committees. Finally, the amendments are submitted to the supervisory authorities of the Russian Federation for registration.

In 2021, the Listing Rules of Moscow Exchange did not include mandatory requirements to publicly disclose information on sustainable development. Nevertheless, Moscow Exchange monitors sustainability disclosure trends in the public reporting of issuing companies. The main monitoring tool is the Responsibility and Transparency Index of Moscow Exchange and the Russian Union of Industrialists and Entrepreneurs (RUIE). When selecting securities for inclusion in this index, more importance is assigned to the quality of the corporate information disclosed in public reporting than to liquidity and capitalization. Companies are chosen to be included in the index based on ESG factors as well as corporate governance indicators.

Detailed information is available in this Report in the subsection “Responsible investing and sustainable growth” of the section “2021 Sustainability Performance Highlights”.

Amendments to listing standards are developed in close cooperation with market participants and the Central Bank of Russia. After such amendments are drafted, the new listing rules are reviewed by committees of Moscow Exchange and approved by the Supervisory Board. Market participants and other stakeholders take part in the work of the committees. Finally, the amendments are submitted to the supervisory authorities of the Russian Federation for registration.

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Moscow Exchange monitors trends in sustainability disclosure and organizes events dedicated to corporate reporting. Recently, Moscow Exchange, together with UN PRI, SASB, and several other organizations, held a number of events dedicated to the disclosure of non-financial information.
STATEMENT OF MOSCOW EXCHANGE ON COMPLIANCE WITH THE PRINCIPLES OF THE UN GLOBAL COMPACT

As of 2021, Moscow Exchange is not a party to the UN Global Compact (UNGC). Nevertheless, it adheres to the 10 principles set forth in it. Moscow Exchange strives to ensure respect for human rights and fair working conditions. Furthermore, it works to prevent corruption in all forms and to promote environmental protection in regions where it has a presence.

<table>
<thead>
<tr>
<th>UN Global Compact principle</th>
<th>Position of Moscow Exchange and measures taken to support the principles</th>
<th>Relevant regulatory documents and initiatives of Moscow Exchange</th>
</tr>
</thead>
<tbody>
<tr>
<td>Human rights</td>
<td>Moscow Exchange carries out all its activities in accordance with the Constitution of the Russian Federation. It has also ratified and implements international agreements on the protection of human rights. Moscow Exchange does not participate directly or indirectly in the financing of organizations whose activities involve human rights abuses. Moscow Exchange takes measures to protect employees from verbal and non-verbal harassment, discrimination on any grounds, humiliation, and threats in any form. Human rights risks are included in the risk management system and are regularly evaluated when the risk map is updated. Moscow Exchange Group also regularly assesses the risk of human rights abuses associated with data confidentiality. To evaluate such risks, it uses proprietary methodology for assessing risk appetite. The main tool for detecting and preventing human rights abuses is the Speak Up! hotline, which is available to employees of the Company. There is also a publicly available hotline on the Moscow Exchange website that any stakeholder can use to report human rights abuses committed by companies of the Group. Should there be any cases of human rights abuse in the course of Moscow Exchange’s activities, it is obliged to take measures to rectify them. The Risk Management Commission of the Supervisory Board and the Internal Audit Service are the main structural units that monitor human rights indicators at the Group.</td>
<td></td>
</tr>
<tr>
<td>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and Principle 2: make sure that businesses are not complicit in human rights abuses.</td>
<td>Code of Professional Conduct of Moscow Exchange</td>
<td></td>
</tr>
<tr>
<td>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; Principle 4: the elimination of all forms of forced and compulsory labor;</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
STATEMENT OF MOSCOW EXCHANGE ON RESPECT FOR HUMAN RIGHTS AND COUNTERACTING MODERN SLAVERY

Introduction

Moscow Exchange recognizes that slavery remains a problem in the modern world. In support of initiatives to stop modern slavery, including the UK’s Modern Slavery Act 2015, Moscow Exchange issues this statement setting out the actions it has taken to prevent any form of modern slavery within Moscow Exchange Group and its supply chains.

This statement also aims to confirm Moscow Exchange’s position that its business partners must not commit any abuses of human rights in their activities.

Moscow Exchange strives to comply with the UN’s Guiding Principles on Business and Human Rights.

The business of Moscow Exchange

Moscow Exchange operates the only comprehensive exchange platform in Russia for trading equities, bonds, derivatives, currency, money market instruments, and commodities. Moscow Exchange Group includes a central depository (the National Settlement Depository) and a clearing center (the National Clearing Center), allowing Moscow Exchange to provide customers with full-cycle trading and post-trading services.

More than 16 million private investors are registered with Moscow Exchange’s website, as well as by including anti-corruption provisions in its contracts. The Company’s suppliers are subject to due diligence. Moscow Exchange plans to assess the risk of human rights abuses in its supply chain.

Risk assessment

Given the technical nature of its business, the risk of Moscow Exchange participating in any business practices that involve human trafficking or modern slavery is low. Moscow Exchange is not aware of any cases that could be deemed an abuse of human rights in its own activities or in those of its subsidiaries and suppliers.

In Moscow Exchange’s procurement structure, 85% of purchases relate to IT, namely development, maintenance and procurement of software and hardware. Approximately 98% of all procurements come from local suppliers.

Communication and training

At Moscow Exchange, all employees are obliged to familiarize themselves regularly with the approaches, values and principles of professional ethics of the Group. The Group has a hotline that can be used by any employee to report violations of the Code of Professional Ethics or other compliance incidents. Whistle-blowers receive a response in full anonymity. The hotline is also available to persons outside the Group, including individuals who work at companies that are part of Moscow Exchange’s supply chain and its business partners.
# APPENDIX 3. GRI CONTENT INDEX

## GRI 101: Foundation (2016)

<table>
<thead>
<tr>
<th>Type of disclosure</th>
<th>Disclosure No.</th>
<th>Disclosure</th>
<th>Section/subsection</th>
<th>Page</th>
<th>Note</th>
<th>Scope</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reporting principles</td>
<td>102-1</td>
<td>Name of the organization</td>
<td>Overview of Moscow Exchange Group’s reporting suite</td>
<td>2-7</td>
<td></td>
<td>1</td>
</tr>
</tbody>
</table>

## GRI 102: General Disclosures (2016)

### Organizational profile

<table>
<thead>
<tr>
<th>Type of disclosure</th>
<th>Disclosure No.</th>
<th>Disclosure</th>
<th>Section/subsection</th>
<th>Page</th>
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</thead>
<tbody>
<tr>
<td>102-1</td>
<td>Name of the organization</td>
<td>Overview of Moscow Exchange Group’s reporting suite</td>
<td>4, 16</td>
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<td>102-2</td>
<td>Activities, brands, products, and services</td>
<td>2021 Sustainability Performance Highlights</td>
<td>16</td>
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<td>102-3</td>
<td>Location of headquarters</td>
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<td>16, 165</td>
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<td>102-4</td>
<td>Location of operations</td>
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<td>102-5</td>
<td>Ownership and legal form</td>
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<td>102-6</td>
<td>Markets served</td>
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### Type of disclosure

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<th>Disclosure No.</th>
<th>Disclosure</th>
<th>Section/subsection</th>
<th>Page</th>
<th>Note</th>
<th>Scope</th>
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</thead>
<tbody>
<tr>
<td>102-7</td>
<td>Scale of the organization</td>
<td>2021 Sustainability Performance Highlights</td>
<td>17-19, 78</td>
<td>Please see Consolidated Financial Statements for the Year Ended 31 December 2021 (page 14), for the composition of the Group. Please see Consolidated Financial Statements for the Year Ended 31 December 2021 (page 11) for the total debt and equity.</td>
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</table>

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The Group takes into account the precautionary principle as set out in the Rio Declaration on Environment and Development, adopted in 1992. In its activities the Group remains mindful of potential impacts on the environment.
For the composition and responsible business practices of 2021 Sustainability Performance

148 149

• Governance

• Ethics and integrity

• Strategy

Type of disclosure Disclosure No. Disclosure Section/subsection Page Note Scope

102-12 External initiatives 2021 Sustainability Performance Highlights 34, 67
Governance and engagement with the community
Advanced governance and responsible business practices
Sustainability Approaches and Procedures
Genuine partnership and engagement with the community

102-13 Membership of associations 2021 Sustainability Performance Highlights 35
Governance and engagement with the community
Sustainability Approaches and Procedures
Genuine partnership and engagement with the community

Strategy

102-14 Statement from senior decision-maker Statement from the Chief Executive Officer 10

102-15 Key impacts, risks, and opportunities 2021 Sustainability Performance Highlights 60
Trusted and resilient market infrastructure
Sustainability Approaches and Procedures
Trusted and resilient market infrastructure
Appendix 1. Moscow Exchange’s Contribution to the UN SDGs

Ethics and integrity

102-16 Values, principles, standards, and norms of behavior Sustainability Approaches and Procedures 160, 161
Environment of respect and empowerment
Advanced governance and responsible business practices

102-17 Mechanisms for advice and concerns about ethics Sustainability Approaches and Procedures 117
Advanced governance and responsible business practices

Governance

102-18 Governance structure 2021 Sustainability Performance Highlights 49, 51
Advanced governance and responsible business practices
Sustainability Approaches and Procedures
Advanced governance and responsible business practices
2021 Annual Report, p. 62

Type of disclosure Disclosure No. Disclosure Section/subsection Page Note Scope

102-19 Delegating authority Sustainability Approaches and Procedures 114
Advanced governance and responsible business practices

102-20 Executive-level responsibility for economic, environmental, and social topics Sustainability Approaches and Procedures 114
Advanced governance and responsible business practices

102-21 Consulting stakeholders on economic, environmental, and social topics Sustainability Approaches and Procedures 93
Genuine partnership and engagement with the community

102-22 Composition of the highest governance body and its committees 2021 Sustainability Performance Highlights 50-51
Advanced governance and responsible business practices
2021 Annual Report, p. 65-73

102-23 Chair of the highest governance body 2021 Sustainability Performance Highlights 50
Advanced governance and responsible business practices
2021 Annual Report, p. 65-73

102-24 Nominating and selecting the highest governance body 2021 Sustainability Performance Highlights 50
Advanced governance and responsible business practices
2021 Annual Report, pp. 63-64, 73

102-25 Conflicts of interest 2021 Sustainability Performance Highlights 51, 114
Advanced governance and responsible business practices
Sustainability Approaches and Procedures
Advanced governance and responsible business practices
2021 Annual Report, pp. 113-117, 118

102-26 Role of highest governance body in setting purpose, values, and strategy Sustainability Approaches and Procedures 104, 113
Environment of respect and empowerment
Advanced governance and responsible business practices
2021 Annual Report, p. 63
### Type of disclosure
<table>
<thead>
<tr>
<th>Disclosure No.</th>
<th>Disclosure</th>
<th>Section/subsection</th>
<th>Page</th>
<th>Note</th>
<th>Scope</th>
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<td>102-28</td>
<td>Evaluating the highest governance body’s performance</td>
<td>2021 Sustainability Performance Highlights</td>
<td>62-113</td>
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<td>102-29</td>
<td>Identifying and managing economic, environmental, and social impacts</td>
<td>Sustainability Approaches and Procedures</td>
<td>50-51, 114</td>
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<td>102-30</td>
<td>Effectiveness of risk management processes</td>
<td>2021 Sustainability Performance Highlights</td>
<td>51-120</td>
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<td>102-31</td>
<td>Review of economic, environmental, and social topics</td>
<td>2021 Annual Report, p. 74</td>
<td>–</td>
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<td>102-32</td>
<td>Highest governance body’s role in sustainability reporting</td>
<td>Overview of Moscow Exchange Group’s reporting suite</td>
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<td>102-33</td>
<td>Communicating critical concerns</td>
<td>2021 Sustainability Performance Highlights</td>
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<td>102-34</td>
<td>Nature and total number of critical concerns</td>
<td>2021 Annual Report, p. 73</td>
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<td>102-35</td>
<td>Remuneration policies</td>
<td>Sustainability Approaches and Procedures</td>
<td>112</td>
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<td>102-36</td>
<td>Process for determining remuneration</td>
<td>Advanced governance and responsible business practices</td>
<td>112</td>
<td>2</td>
<td></td>
</tr>
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<td>Stakeholder engagement</td>
<td>List of stakeholder groups</td>
<td>Sustainability Approaches and Procedures</td>
<td>96</td>
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### Type of disclosure
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<th>Section/subsection</th>
<th>Page</th>
<th>Note</th>
<th>Scope</th>
</tr>
</thead>
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<tr>
<td>102-41</td>
<td>Collective bargaining agreements</td>
<td>Environment of respect and empowerment</td>
<td>79</td>
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<td>Currently, there are no collective agreements in place with employees. Moscow Exchange Group recognizes the right of its employees to sign collective agreements, the right to freedom of assembly and association, and the right to form and join organizations representing their interests without fear of any consequences.</td>
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<td>102-42</td>
<td>Identifying and selecting stakeholders</td>
<td>GRI Content Index</td>
<td>151</td>
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<td>Stakeholders have been identified through internal consultations with business units.</td>
</tr>
<tr>
<td>102-43</td>
<td>Approach to stakeholder engagement</td>
<td>Overview of Moscow Exchange Group’s reporting suite</td>
<td>5-56</td>
<td>1</td>
<td></td>
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<tr>
<td>102-44</td>
<td>Key topics and concerns raised</td>
<td>Sustainability Approaches and Procedures</td>
<td>95</td>
<td>1</td>
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</tbody>
</table>

### Reporting practice
<table>
<thead>
<tr>
<th>Disclosure No.</th>
<th>Disclosure</th>
<th>Section/subsection</th>
<th>Page</th>
<th>Note</th>
<th>Scope</th>
</tr>
</thead>
<tbody>
<tr>
<td>102-45</td>
<td>Entities included in the consolidated financial statements</td>
<td>Overview of Moscow Exchange Group’s reporting suite</td>
<td>4</td>
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<td></td>
</tr>
<tr>
<td>102-46</td>
<td>Defining report content and topic Boundaries</td>
<td>Overview of Moscow Exchange Group’s reporting suite</td>
<td>5</td>
<td>1</td>
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</tr>
<tr>
<td>102-47</td>
<td>List of material topics</td>
<td>MOEX Group’s approach to materiality</td>
<td>5</td>
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<tr>
<td>102-48</td>
<td>Restatements of information</td>
<td>Overview of Moscow Exchange Group’s reporting suite</td>
<td>4</td>
<td>1</td>
<td>The list of material topics has not changed since 2020. The boundaries of reporting on material topics have not changed.</td>
</tr>
</tbody>
</table>
The Sustainability

152
153

• GRI 103: Management Approach (2016)
• GRI 203: Indirect Economic Impacts (2016)

Type of disclosure Disclosure No. Disclosure Disclosure Section/subsection Page Note Scope

102-50 Reporting period Overview of Moscow Exchange Group's reporting suite 2 1 January 2021 – 31 December 2021 1
102-51 Date of most recent report Moscow Exchange Group 2021 Sustainability Report 2 28 May 2021 1
102-52 Reporting cycle GRI Content Index 2 The Sustainability Report has been published annually since 2019. 1

102-53 Contact point for questions regarding the report Appendix 7. Contact Details 168 1

102-54 Claims of reporting in accordance with the GRI Standards Overview of Moscow Exchange Group's reporting suite Guidelines and standards used in preparing the Report 4 1

102-55 GRI Content Index GRI Content Index 146-151 1

102-56 External assurance Appendix 6. Opinion of the Independent Auditor 156-157 1

GRI 103: Management Approach (2016)

103-1 Explanation of the material topics and its Boundary Disclosure labels can be found in the text of the Report where information is provided on the approach to managing a given material topic. Correlation of material topics and sections of the report:

Improving disclosure of ESG information by issuers, increasing awareness of sustainability trends — the subsection “Responsible investing and sustainable growth”

Transparent functioning of markets and development of fair competition — the subsection “Advanced governance and responsible business practices”

Improving financial literacy — the subsection “Partnership and engagement with local communities”

Development of new financial instruments for responsible investing — the subsection “Responsible investing and sustainable growth”

Development of exchange infrastructure to increase the number of local physical and institutional investors — the subsection “Trusted and resilient market infrastructure”

Participation in specialized working groups and regulatory initiatives — the subsection “Partnership and engagement with local communities”

Decent working conditions and employee development — the subsection “Environment of respect and empowerment”

Financial infrastructure support — the subsection “Trusted and resilient market infrastructure”

Economic

GRI 201: Economic Performance (2016)

201-1 Direct economic value generated and distributed Sustainability Data Advanced governance and responsible business practices 52 1

201-2 Financial implications and other risks and opportunities due to climate change 2021 Sustainability Performance Highlights Trusted and resilient market infrastructure Climate agenda 25, 52 1


202-1 Ratios of standard entry level wage by gender compared to local minimum wage 2021 Sustainability Performance Highlights Environment of respect and empowerment Sustainability Data Environment of respect and empowerment 47, 81 1

GRI 203: Indirect Economic Impacts (2016)

203-1 Infrastructure investments and services supported 2021 Sustainability Performance Highlights Genuine partnership and engagement with the community Sustainability Data Genuine partnership and engagement with the community Sustainability Approaches and Procedures Genuine partnership and engagement with the community 32, 35, 72-73, 90-91 1

203-2 Significant indirect economic impacts 2021 Sustainability Performance Highlights Genuine partnership and engagement with the community Sustainability Approaches and Procedures Genuine partnership and engagement with the community 31-32, 35, 50-51 1
<table>
<thead>
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<th>Type of disclosure</th>
<th>Disclosure No.</th>
<th>Disclosure</th>
<th>Section/subsection</th>
<th>Page</th>
<th>Note</th>
<th>Scope</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GRI 204: Procurement Practices (2016)</strong></td>
<td>204-1</td>
<td>Proportion of spending on local suppliers</td>
<td>2021 Sustainability Performance Highlights</td>
<td>56</td>
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<td><strong>GRI 205: Anti-corruption (2016)</strong></td>
<td>205-1</td>
<td>Operations assessed for risks related to corruption</td>
<td>2021 Sustainability Performance Highlights</td>
<td>57</td>
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<td>205-2</td>
<td>Communication and training about anti-corruption policies and procedures</td>
<td>2021 Sustainability Performance Highlights</td>
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<td>205-3</td>
<td>Confirmed incidents of corruption and actions taken</td>
<td>2021 Sustainability Performance Highlights</td>
<td>56, 57</td>
<td>83</td>
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<td>In 2019–2021, no violations of anti-corruption laws were registered in the Group. The Group is not aware of any anti-corruption violations among its business partners related to their cooperation with Moscow Exchange.</td>
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<td><strong>GRI 206: Anti-competitive Behavior (2016)</strong></td>
<td>206-1</td>
<td>Legal actions for anti-competitive behavior, anti-trust, and monopoly practices</td>
<td>2021 Sustainability Performance Highlights</td>
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<td>There have been no confirmed cases of antitrust violations over the past three years.</td>
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<td><strong>GRI 207: Tax (2019)</strong></td>
<td>207-1</td>
<td>Approach to tax</td>
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<td>117</td>
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<th>Disclosure</th>
<th>Section/subsection</th>
<th>Page</th>
<th>Note</th>
<th>Scope</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GRI 302: Energy (2016)</strong></td>
<td>302-1</td>
<td>Energy consumption within the organization</td>
<td>2021 Sustainability Performance Highlights</td>
<td>85, 85</td>
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<tr>
<td></td>
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<td>MOEX Group’s resource efficiency and environmental impact</td>
<td>Sustainability Data</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td><strong>GRI 303: Water and Effluents (2018)</strong></td>
<td>303-3</td>
<td>Water withdrawal</td>
<td>MOEX Group’s resource efficiency and environmental impact</td>
<td>85-87</td>
<td>129</td>
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<td></td>
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<td>MOEX Group consumes and withdraws water only from municipal networks and does not operate in regions with a water shortage; the volume of water consumed is equal to the volume of water withdrawn.</td>
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<td><strong>GRI 304: Biodiversity (2016)</strong></td>
<td>304-1</td>
<td>Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas</td>
<td>GRI Content Index</td>
<td>156</td>
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<td>Organizations included within the reporting boundaries operate in the city of Moscow, far from protected natural areas and areas with high biodiversity.</td>
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<td><strong>GRI 305: Emissions (2016)</strong></td>
<td>305-1</td>
<td>Direct (Scope 1) GHG emissions</td>
<td>2021 Sustainability Performance Highlights</td>
<td>85</td>
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<td></td>
<td>305-2</td>
<td>Energy indirect (Scope 2) GHG emissions</td>
<td>MOEX Group’s resource efficiency and environmental impact</td>
<td>85</td>
<td></td>
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<td></td>
<td>305-3</td>
<td>Other indirect (Scope 3) GHG emissions</td>
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<td></td>
<td>305-4</td>
<td>GHG emissions intensity</td>
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<td>Disclosure No.</td>
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<td>306-2</td>
<td>Management of significant waste-related impacts</td>
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<td>67</td>
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<td>306-3</td>
<td>Waste generated</td>
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<td>86-87</td>
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<td></td>
<td>306-5</td>
<td>Waste directed to disposal</td>
<td>MOEX Group’s resource efficiency and environmental impact</td>
<td>66</td>
<td></td>
<td></td>
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<tr>
<td>GRI 307: Environmental Compliance (2016)</td>
<td>307-1</td>
<td>Non-compliance with environmental laws and regulations</td>
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<td>86-87</td>
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<td>GRI 401: Employment (2016)</td>
<td>401-1</td>
<td>New employee hires and employee turnover</td>
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<td>45</td>
<td>74</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>401-2</td>
<td>Benefits provided to full-time employees that are not provided to temporary or part-time employees</td>
<td>Sustainability Approaches and Procedures</td>
<td>106</td>
<td></td>
<td>1</td>
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<td>401-3</td>
<td>Parental leave</td>
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<th>Type of disclosure</th>
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<th>Section/subsection</th>
<th>Page</th>
<th>Note</th>
<th>Scope</th>
</tr>
</thead>
<tbody>
<tr>
<td>GRI 402: Labor/Management Relations (2016)</td>
<td>402-1</td>
<td>Minimum notice periods regarding operational changes</td>
<td>GRI Content Index</td>
<td>105</td>
<td>197</td>
<td>1</td>
</tr>
</tbody>
</table>

The Labor Code of the Russian Federation requires that the Group notify employees of significant changes in its activities at least two months in advance.

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<table>
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<th>Type of disclosure</th>
<th>Disclosure No.</th>
<th>Disclosure</th>
<th>Section/subsection</th>
<th>Page</th>
<th>Note</th>
<th>Scope</th>
</tr>
</thead>
<tbody>
<tr>
<td>GRI 403: Occupational Health and Safety (2018)</td>
<td>403-1</td>
<td>Occupational health and safety management system</td>
<td>Sustainability Approaches and Procedures</td>
<td>109</td>
<td></td>
<td>1</td>
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</tbody>
</table>

A description of the occupational health and safety management system for workers who are not employees is omitted due to unavailability of information.

At the moment, the Group’s occupational health and safety management system does not cover individuals who are not employed by the Group’s companies.

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<thead>
<tr>
<th>Type of disclosure</th>
<th>Disclosure No.</th>
<th>Disclosure</th>
<th>Section/subsection</th>
<th>Page</th>
<th>Note</th>
<th>Scope</th>
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<tr>
<td>GRI 407: Environmental Compliance (2016)</td>
<td>307-1</td>
<td>Non-compliance with environmental laws and regulations</td>
<td>Sustainability Data</td>
<td>86-87</td>
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No environmental violations have been identified at Moscow Exchange Group.

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<tr>
<td>GRI 403: Occupational Health and Safety (2018)</td>
<td>403-2</td>
<td>Hazard identification, risk assessment, and incident investigation</td>
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<td>GRI 403: Occupational Health and Safety (2018)</td>
<td>403-3</td>
<td>Occupational health services</td>
<td>2021 Sustainability Performance Highlights</td>
<td>57</td>
<td>68</td>
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Environment of respect and empowerment

Overview of the COVID-19 response

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<tr>
<td>GRI 403: Occupational Health and Safety (2018)</td>
<td>403-4</td>
<td>Worker participation, consultation, and communication on occupational health and safety</td>
<td>Sustainability Approaches and Procedures</td>
<td>109</td>
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</tbody>
</table>

Employees can raise any occupational health and safety issues with technical support specialists and can file requests, complaints, or suggestions on the topic.

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<th>Type of disclosure</th>
<th>Disclosure No.</th>
<th>Disclosure</th>
<th>Section/subsection</th>
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<tr>
<td>GRI 403: Occupational Health and Safety (2018)</td>
<td>403-5</td>
<td>Worker training on occupational health and safety</td>
<td>2021 Sustainability Performance Highlights</td>
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<td>82</td>
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Environment of respect and empowerment

Overview of the COVID-19 response

Sustainability Data

Environment of respect and empowerment

Sustainability Approaches and Procedures

Environment of respect and empowerment
<table>
<thead>
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<th>Disclosure</th>
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<th>Note</th>
<th>Scope</th>
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<tbody>
<tr>
<td>GRI 404: Training and Education (2016)</td>
<td>404-1</td>
<td>Average hours of training per year per employee</td>
<td>Sustainability Data</td>
<td>80</td>
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<tr>
<td></td>
<td>404-2</td>
<td>Programs for upgrading employee skills and transition assistance programs</td>
<td>Sustainability Data</td>
<td>46-107,108</td>
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<table>
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<th>Note</th>
<th>Scope</th>
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<tbody>
<tr>
<td>GRI 405: Diversity and Equal Opportunity (2016)</td>
<td>405-1</td>
<td>Diversity of governance bodies and employees</td>
<td>Sustainability Data</td>
<td>75, 81</td>
<td></td>
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<tr>
<td></td>
<td>405-2</td>
<td>Ratio of basic salary and remuneration of women to men</td>
<td>Sustainability Data</td>
<td>81</td>
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<table>
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<th>Section/subsection</th>
<th>Page</th>
<th>Note</th>
<th>Scope</th>
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<tbody>
<tr>
<td>GRI 406: Non-discrimination (2016)</td>
<td>406-1</td>
<td>Incidents of discrimination and corrective actions taken</td>
<td>Sustainability Data</td>
<td>81</td>
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</table>

<table>
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<th>Note</th>
<th>Scope</th>
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<tbody>
<tr>
<td>GRI 407: Freedom Of Association And Collective Bargaining (2016)</td>
<td>407-1</td>
<td>Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk</td>
<td>GRI Content Index</td>
<td>150</td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Type of disclosure</td>
<td>Disclosure No.</td>
<td>Disclosure</td>
<td>Section/subsection</td>
<td>Page</td>
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<td>Scope</td>
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</tr>
<tr>
<td>GRI 408: Child Labor (2016)</td>
<td>• 408-1</td>
<td>Operations and suppliers at significant risk for incidents of child labor</td>
<td>GRI Content Index</td>
<td>160</td>
<td>No risk of child labor has been identified at any of the Group’s entities. The information about suppliers at significant risk for incidents of child labor is omitted due to the fact that the Group does not currently assess suppliers for that risk.</td>
<td>1</td>
</tr>
<tr>
<td>GRI 409: Forced Or Compulsory Labor (2016)</td>
<td>• 409-1</td>
<td>Operations and suppliers at significant risk for incidents of forced or compulsory labor</td>
<td>GRI Content Index</td>
<td>160</td>
<td>No risk of forced or compulsory labor has been identified at any of the Group’s entities. The information about suppliers at significant risk for incidents of forced or compulsory labor is omitted due to the fact that the Group does not currently assess suppliers for that risk.</td>
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<tr>
<td>GRI 412: Human Rights Assessment (2016)</td>
<td>• 412-1</td>
<td>Operations that have been subject to human rights reviews or impact assessments</td>
<td>GRI Content Index</td>
<td>161</td>
<td>No assessments were conducted in 2021.</td>
<td>1</td>
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<tr>
<td>• 412-2</td>
<td>Employee training on human rights policies or procedures</td>
<td>GRI Content Index</td>
<td>161</td>
<td>No employee training on human rights policies or procedures was conducted at the Group.</td>
<td>1</td>
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</tr>
<tr>
<td>GRI 413: Local Communities (2016)</td>
<td>• 413-1</td>
<td>Operations with local community engagement, impact assessments, and development programs</td>
<td>2021 Sustainability Performance Highlights, Genuine partnership and engagement with the community Sustainability Approaches and Procedures, Genuine partnership and engagement with the community</td>
<td>31-32, 35, 90-93</td>
<td>Percentage of operations with implemented local community engagement is omitted. Local community engagement programs are realized through activities aimed at improving financial literacy.</td>
<td>1</td>
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<tr>
<td>GRI 415: Public Policy (2016)</td>
<td>• 415-1</td>
<td>Political contributions</td>
<td>2021 Sustainability Performance Highlights, Genuine partnership and engagement with the community Sustainability Data, Genuine partnership and engagement with the community</td>
<td>36, 73</td>
<td>In 2021, the Group made no political donations.</td>
<td>1</td>
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</table>
## APPENDIX 4. SASB METRICS

### SECURITY & COMMODITY EXCHANGES

<table>
<thead>
<tr>
<th>Code</th>
<th>Metric</th>
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<th>Disclosure status</th>
<th>Section</th>
<th>Page</th>
<th>Scope</th>
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</thead>
<tbody>
<tr>
<td>FN-EX-410a.1</td>
<td>(1) Number and (2) average duration of (a) suspensions related to public release of information and (b) pauses related to volatility</td>
<td>%</td>
<td>Disclosed</td>
<td>Sustainability Data</td>
<td>6, 85</td>
<td>1</td>
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<tr>
<td></td>
<td>(1) Number, (2) minutes</td>
<td></td>
<td></td>
<td>Trusted and resilient market infrastructure</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Note: Since 2018, all suspensions last 30 minutes under the updated trading rules, so the average time is always 30 minutes. After a pause of 30 minutes, there is a transition to discrete auction mode: in 2021, not a single suspension was recorded. Due to the absence of regulatory requirements, Moscow Exchange does not collect statistics on trading suspensions that occurred due to material events in accordance with the requirements specified in the SASB Standards. As such, the Exchange cannot disclose these indicators in verified form.</td>
<td></td>
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<tr>
<td>FN-EX-410a.2</td>
<td>Percentage of trades generated from automated trading systems</td>
<td>%</td>
<td>Disclosed</td>
<td>Sustainability Data</td>
<td>6, 85</td>
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<td></td>
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<td>Trusted and resilient market infrastructure</td>
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<td></td>
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<tr>
<td>FN-EX-410a.3</td>
<td>Description of alert policy regarding timing and nature of public release of information</td>
<td>--</td>
<td>Disclosed</td>
<td>2021 Sustainability Performance Highlights</td>
<td>5, 37</td>
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<td>Responsible investing and sustainable growth</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>Listing Rules of Moscow Exchange</td>
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<tr>
<td>FN-EX-410a.4</td>
<td>Description of policy to encourage or require listed companies to publicly disclose environmental, social, and governance (ESG) information</td>
<td>--</td>
<td>Disclosed</td>
<td>2021 Sustainability Performance Highlights</td>
<td>5</td>
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<td>Sustainability Approaches and Procedures</td>
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<td></td>
<td>Responsible investing and sustainable growth</td>
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### Managing conflicts of interest

<table>
<thead>
<tr>
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<th>Metric</th>
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<th>Section</th>
<th>Page</th>
<th>Scope</th>
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</thead>
<tbody>
<tr>
<td>FN-EX-510a.1</td>
<td>Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations</td>
<td>RUB</td>
<td>Disclosed</td>
<td>Sustainability Data</td>
<td>5-7</td>
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<td></td>
<td></td>
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<td></td>
<td>Advanced governance and responsible business practices</td>
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<tr>
<td>FN-EX-510a.2</td>
<td>Discussion of processes for identifying and assessing conflicts of interest</td>
<td>--</td>
<td>Disclosed</td>
<td>Sustainability Approaches and Procedures</td>
<td>7, 114</td>
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<td></td>
<td></td>
<td></td>
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<td>Advanced governance and responsible business practices</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>2021 Annual Report, 2021, pp. 113-117, 146</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Conflict of Interest and Corporate Controls Policy of Moscow Exchange</td>
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### Managing business continuity and technology risks

<table>
<thead>
<tr>
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<th>Metric</th>
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<th>Section</th>
<th>Page</th>
<th>Scope</th>
</tr>
</thead>
<tbody>
<tr>
<td>FN-EX-550a.1</td>
<td>(1) Number and (2) duration of significant market disruptions and (2) number of customers affected</td>
<td>Hours, minutes</td>
<td>Disclosed</td>
<td>Sustainability Data</td>
<td>6, 85</td>
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<td>Trusted and resilient market infrastructure</td>
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<td>FN-EX-550a.2</td>
<td>(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected</td>
<td>Number, percentage (%)</td>
<td>Disclosed</td>
<td>Sustainability Data</td>
<td>6, 85</td>
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<td>Trusted and resilient market infrastructure</td>
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<tr>
<td>FN-EX-550a.3</td>
<td>Description of efforts to prevent technology errors, security breaches, and market disruptions</td>
<td>--</td>
<td>Disclosed</td>
<td>2021 Sustainability Performance Highlights</td>
<td>6, 59, 61</td>
<td>125-127</td>
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<td>Trusted and resilient market infrastructure</td>
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### Activity metrics

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<tr>
<td>FN-EX-000.A</td>
<td>Average daily number of trades executed, by product or asset class</td>
<td>Number</td>
<td>Disclosed</td>
<td>2021 Sustainability Performance Highlights</td>
<td>6, 19, 74</td>
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<td></td>
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<td>Key indicators</td>
<td>Sustainability Data</td>
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<td>Responsible investing and sustainable growth</td>
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<tr>
<td>FN-EX-000.B</td>
<td>Average daily volume traded, by product or asset class</td>
<td>RUB</td>
<td>Disclosed</td>
<td>2021 Sustainability Performance Highlights</td>
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<td>Key indicators</td>
<td>Sustainability Data</td>
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</table>
## APPENDIX 5. GLOSSARY

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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</thead>
<tbody>
<tr>
<td>AVG</td>
<td>Average daily trading volume</td>
</tr>
<tr>
<td>AI/ML solutions</td>
<td>Artificial intelligence/machine learning solutions</td>
</tr>
<tr>
<td>AML/CFT</td>
<td>Anti-money laundering/combating the financing of terrorism</td>
</tr>
<tr>
<td>CBI</td>
<td>Climate Bonds Initiative: a bond initiative for financing global climate change projects</td>
</tr>
<tr>
<td>CBR</td>
<td>Central Bank of Russia</td>
</tr>
<tr>
<td>CDPR</td>
<td>Carbon Disclosure Project: an international project aimed at disclosing information on GHG emissions</td>
</tr>
<tr>
<td>C/CDD processes</td>
<td>Continuous Integration and Continuous Delivery processes</td>
</tr>
<tr>
<td>COP26</td>
<td>The 26th UN Climate Change Conference</td>
</tr>
<tr>
<td>COSO</td>
<td>Committee of Sponsoring Organizations of the Treadway Commission. For the purposes of this report, COSO is a guide for organizing internal control systems issued by this organization</td>
</tr>
<tr>
<td>COVID-19</td>
<td>A coronavirus disease caused by the SARS-CoV-2 virus</td>
</tr>
<tr>
<td>CRS</td>
<td>Common Reporting Standard: a unified standard for automatic exchange of tax information</td>
</tr>
<tr>
<td>Data Ops</td>
<td>Data operators: a concept and a set of practices for continuous data integration between processes, teams, and systems</td>
</tr>
<tr>
<td>DC</td>
<td>Data center</td>
</tr>
<tr>
<td>DevOps</td>
<td>Development and operations: methodology for automating technological processes for software installation, configuration, and deployment</td>
</tr>
<tr>
<td>Direct greenhouse gas emissions</td>
<td>Emissions from greenhouse gas sources owned or controlled by the reporting entity</td>
</tr>
<tr>
<td>EGRUL</td>
<td>Unified State Register of Legal Entities</td>
</tr>
<tr>
<td>ESB</td>
<td>Enterprise service bus: software that facilitates data exchange between different information systems of an enterprise</td>
</tr>
<tr>
<td>ESG</td>
<td>Environmental, social, and governance: principles of environmental protection, social responsibility, and corporate governance</td>
</tr>
<tr>
<td>ETF</td>
<td>Exchange-traded funds</td>
</tr>
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<td>FATCA</td>
<td>Foreign Account Tax Compliance Act</td>
</tr>
<tr>
<td>FESE</td>
<td>Federation of European Securities Exchanges</td>
</tr>
<tr>
<td>FIA</td>
<td>Futures Industry Association</td>
</tr>
<tr>
<td>FIFO</td>
<td>First in, first out: a principle strictly applied to processing applications of participants</td>
</tr>
<tr>
<td>FX</td>
<td>Foreign exchange</td>
</tr>
<tr>
<td>Green bonds</td>
<td>A type of bond that meets the four principles of green bonds defined by the ICMA, with proceeds used by the issuer to finance projects committed to these principles. In general, such projects should result in specific environmental benefits and should be aimed at developing activities that contribute to environmental sustainability</td>
</tr>
<tr>
<td>GRI SRS (G)</td>
<td>Global Reporting Initiative Sustainability Reporting Standards: the global standards for sustainability reporting</td>
</tr>
<tr>
<td>Growth sector</td>
<td>An initiative of Moscow Exchange and a number of partners—an exchange sector designed to help SMEs attract investment</td>
</tr>
<tr>
<td>HR</td>
<td>Human resources</td>
</tr>
<tr>
<td>IFS</td>
<td>International Interbank Financial System</td>
</tr>
<tr>
<td>IM</td>
<td>Innovation and Investment Market</td>
</tr>
<tr>
<td>Indirect GHG Emissions</td>
<td>Emissions that result from the activities of the reporting entity, but which occur beyond its established boundaries. Scope 2 covers indirect greenhouse gas emissions associated with the company’s consumption of electricity, heat, or steam received from external generation facilities. Scope 3 corresponds to other indirect emissions, including emissions from extraction and processing of purchased materials, fuel and services; freight transportation by vehicles not owned or controlled by the reporting entity; external contractor activities; waste disposal, etc.</td>
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<td>IOSCO</td>
<td>International Organization of Securities Commissions</td>
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<td>IPCC</td>
<td>Intergovernmental Panel on Climate Change</td>
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<td>IPO</td>
<td>Initial public offering of shares on a stock exchange</td>
</tr>
<tr>
<td>IR</td>
<td>Investor relations</td>
</tr>
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<td>ISO</td>
<td>International Organization for Standardization</td>
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<tr>
<td>IT</td>
<td>Information technology</td>
</tr>
<tr>
<td>KPI</td>
<td>Key performance indicators</td>
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</table>

## Term Definition

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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</thead>
<tbody>
<tr>
<td>KYC</td>
<td>Know Your Customer: a principle of banking and exchange organizations that involves vetting a counterparty before conducting a financial transaction</td>
</tr>
<tr>
<td>MEMS</td>
<td>MOEX’s extra motivation system</td>
</tr>
<tr>
<td>MEPHI</td>
<td>Moscow Engineering Physics Institute (National Research Nuclear University)</td>
</tr>
<tr>
<td>MICEX</td>
<td>Moscow Interbank Currency Exchange</td>
</tr>
<tr>
<td>MLOPS</td>
<td>Machine learning operations: a set of practices that aims to deploy and maintain machine learning models</td>
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<tr>
<td>MSCI</td>
<td>Morgan Stanley Capital International</td>
</tr>
<tr>
<td>MVP</td>
<td>Minimum viable product: a concept facilitating the creation of a product with features that attract customers</td>
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<tr>
<td>NCC</td>
<td>National Clearing Center</td>
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<tr>
<td>NCRE</td>
<td>National Commodity Exchange</td>
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<tr>
<td>NP</td>
<td>Non-profit partnership</td>
</tr>
<tr>
<td>NSF</td>
<td>National Settlement Depository</td>
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<tr>
<td>OECD</td>
<td>Organization for Economic Co-operation and Development</td>
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<tr>
<td>OSAGO</td>
<td>Compulsory car insurance</td>
</tr>
<tr>
<td>PJSC</td>
<td>Public joint-stock company</td>
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<tr>
<td>PRI</td>
<td>Principles of Responsible Investment: a UN initiative to promote responsible investment principles</td>
</tr>
<tr>
<td>RBEN</td>
<td>Russian Business Ethics Network: a network of business ethics and CSR associations</td>
</tr>
<tr>
<td>Repo</td>
<td>A transaction on the purchase (sale) of a security with an obligation to resell (purchase) after a certain period of time at a predetermined price specified in the agreement</td>
</tr>
<tr>
<td>Responsible investment</td>
<td>An investment approach that takes into account environmental, social and governance factors, as well as issues of long-term market stability</td>
</tr>
<tr>
<td>RF</td>
<td>Russian Federation</td>
</tr>
<tr>
<td>Ring the Bell for Financial Literacy</td>
<td>An international initiative of exchanges that seeks to ensure general access of the public to basic financial literacy as part of the UN Sustainable Development Goals</td>
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<tr>
<td>Ring the Bell for Gender Equality</td>
<td>An international initiative of exchanges that promotes gender equality as part of the UN Sustainable Development Goals</td>
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<tr>
<td>RSNB</td>
<td>Russian Agricultural Bank</td>
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<tr>
<td>RUSP</td>
<td>Russian Union of Industrialists and Entrepreneurs</td>
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<tr>
<td>SASB</td>
<td>Sustainability Accounting Standards Board</td>
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<tr>
<td>SASB Security &amp; Commodity Exchanges, Sustainability Accounting Standard</td>
<td>Sustainability accounting standard for security and commodity exchanges, developed by the SASB</td>
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<tr>
<td>Scope 1</td>
<td>Scope 1 (GHG), see Direct GHG Emissions</td>
</tr>
<tr>
<td>Scope 2</td>
<td>Scope 2 (GHG), see Indirect GHG Emissions</td>
</tr>
<tr>
<td>Scope 3</td>
<td>Scope 3 (GHG), see Indirect GHG Emissions</td>
</tr>
<tr>
<td>SME</td>
<td>Small and medium-sized enterprises</td>
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<tr>
<td>Social bonds</td>
<td>A type of bond that meets the four principles of social bonds defined by the ICMA, with proceeds used by the issuer to finance social projects committed to these principles. In general, such projects should aim to solve significant social problems</td>
</tr>
<tr>
<td>SPO</td>
<td>Secondary Public Offering: a public offering of shares from an issuer already listed on a stock exchange</td>
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<tr>
<td>SSE</td>
<td>Sustainable Stock Exchanges initiative: a UN Partnership Programme organized by the UN Conference on Trade and Development (UNCTAD), the UN Global Compact, the UN Environment Programme Finance Initiative (UNEP FI), and the UN Principles for Responsible Investment (PRI)</td>
</tr>
<tr>
<td>Sustainability sector</td>
<td>An initiative of Moscow Exchange and the Ministry of Economic Development—an exchange sector aimed at promoting investment in environmental and social projects</td>
</tr>
<tr>
<td>TCFD</td>
<td>Task Force on Climate-Related Financial Disclosures, created by the Financial Stability Board</td>
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<tr>
<td>TIA</td>
<td>Technical training aids</td>
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<tr>
<td>UN SDGs</td>
<td>United Nations Sustainable Development Goals</td>
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<tr>
<td>UNEP FI</td>
<td>United Nations Environment Programme—Finance Initiative</td>
</tr>
<tr>
<td>UNGC</td>
<td>United Nations Global Compact</td>
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<tr>
<td>VEB RF</td>
<td>The Russian National Green Finance Methodology, developed from March 2020 to May 2021 and approved by a decree of the Russian Government on 21 September 2021; the National Methodology covers the taxonomy of green projects, the taxonomy of adaptation projects, and green finance standards</td>
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<tr>
<td>VHI</td>
<td>Voluntary health insurance</td>
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<tr>
<td>WFE</td>
<td>World Federation of Exchanges</td>
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<tr>
<td>WHO</td>
<td>World Health Organization</td>
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</table>
INDEPENDENT PRACTITIONER’S LIMITED ASSURANCE REPORT (TRANSLATION FROM RUSSIAN ORIGINAL)

To the management of Public Joint-Stock Company Moscow Exchange MOEX-RTS

We have undertaken a limited assurance engagement of the accompanying Moscow Exchange 2021 Sustainability Report (hereinafter referred to as the Report).

Responsibility of Public Joint-Stock Company Moscow Exchange MOEX-RTS

Public Joint-Stock Company Moscow Exchange MOEX-RTS (hereinafter referred to as Moscow Exchange) is responsible for the preparation of the Report in compliance with the requirements of GRI Sustainability Reporting Standards for the report prepared in accordance with the Core option and the requirements of the Sustainability Accounting Standards Board “Security and Commodity Exchanges” Standard (hereinafter - the SASB “Security and Commodity Exchanges” Standard). This responsibility includes the design, implementation and maintenance of the internal control system relevant to the preparation of the Report that is free from material misstatement, whether due to fraud or error.

Our Independence and Quality Control

We have complied with the independence and other ethical requirements of the Rules of Independence of the Auditors and Audit Organizations and The Code of Professional Ethics of the Auditors, which are in accordance with International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants, which is based on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior, and we have fulfilled our other ethical responsibilities in accordance with those requirements.

The firm applies International Standard on Quality Control 1, Quality Control for the firm that perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements, and accordingly maintains appropriate system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our Responsibility

Our responsibility is to express a limited assurance conclusion:

- on the report compliance with the requirements of GRI Sustainability Reporting Standards for the report prepared in accordance with the Core option
- on the report compliance with the requirements of the SASB “Security and Commodity Exchanges” Standard.

based on the procedures we have performed and the evidence we have obtained. We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Hatasical Financial Information. This standard requires that we plan and perform this engagement to obtain limited assurance about whether the Report is free from material misstatement.

A limited assurance engagement undertaken in accordance with this standard involves assessing compliance of the Report with the following criteria (hereinafter referred to as Criteria):

- requirements of GRI Sustainability Reporting Standards for the report prepared in accordance with the Core option;
- requirements of the SASB “Security and Commodity Exchanges” Standard.

A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

The procedures we performed were based on our professional judgment and included inquiries, inspections of documents, analytical procedures, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

Given the circumstances of the engagement, in performing the procedures listed above we have undertaken the following activities:

- Interviewing the management and employees of Moscow Exchange and obtaining documentary evidence;
- Study of information available on the websites of the Moscow Exchange Group companies related to their activities in the context of sustainable development;
- Study of public statements of third parties concerning economic, environmental and social aspects of the Moscow Exchange Group companies activities, in order to check the validity of the disclosures made in the Report;
- Analysis of non-financial reports of companies working in the similar market segment for benchmarking purposes;
- Review of documents and data on the efficiency of the management systems of economic, environmental and social aspects of sustainable development in Moscow Exchange;
- Study of the existing processes of collection, processing, documenting, verification, analysis and selection of data to be included into the Report;
- Analysis of information in the Report for compliance with the Criteria.

The procedures were performed only in relation to data for the year ended 31 December 2021. The evaluation of reliability of the information on performance in the Report was conducted in relation to compliance with the requirements of GRI Sustainability Reporting Standards for the report prepared in accordance with the Core option and the requirements of the SASB “Security and Commodity Exchanges” Standard, as well as with respect to information referred to in the sections of the Report “GRI Content Index” and “SASB Index”. With respect to the information assessment of its content to external and internal reporting documents provided to us were performed.

The procedures were not performed in relation to forward-looking statements, statements expressing the opinions, beliefs and intentions of Moscow Exchange as the parent company of Moscow Exchange Group to take any action related to the future, as well as statements based on expert opinion.

The procedures were performed in relation to the Russian version of the Report subject to be published as well as to the site to Global Reporting Initiative in order to verify the use of the GRI Sustainability Reporting Standards in the Report preparation.

The procedures performed in a limited assurance engagement vary in nature and timing from one to another, and are less in that they are for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion about compliance of the Report, in all material respects, with the requirements of Criteria.

Limited Assurance Conclusion on the compliance of the Report with the requirements of the GRI Sustainability Reporting Standards for the Core option

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the Report has not complied, in all material respects, with the requirements of Sustainability Reporting Standards for the report prepared in accordance with the Core option.

Limited Assurance Conclusion on the compliance of the Report with the requirements of the SASB “Security and Commodity Exchanges” Standard

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the Report has not complied, in all material respects, with the requirements of SASB “Security and Commodity Exchanges” Standard.

FBK
PricewaterhouseCoopers

Translated by V.Y. Shkolny

The Russian Federation, Moscow
July 4, 2022
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