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**Anti-Corruption Policy
of Sberbank Group**

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1. General Provisions

1.1. The Anti-Corruption Policy of the Sberbank Group (hereinafter, the “Policy”) defines the main goals, objectives, measures and dimensions of the anti-corruption system at the Bank and the Group members, as well as system participants, their functions and powers.

1.2. The Policy is an element of the compliance risk management system; it establishes the managerial and organizational foundations of forestalling corruption, in particular, in dealings with individuals and legal entities, government and municipal authorities, the Bank of Russia, officials and other persons, as well as of measures aimed at mitigating and/or eliminating the consequences of any corruption offenses.

1.3. The Policy was developed in accordance with the requirements of Russian laws, including /1/, applicable international rules, including /2/, /3/, /4/, international standards /5/ and /6/, recommendations /7/, /8/, /9/, as well as taking into account the best Russian and foreign principles and practices, including /10/, /11/, /12/, /13/.

1.4. The Policy is aimed at aligning all Bank and Group members’ employees in their understanding of the substance of corrupt activity, its various forms and manifestations, in order to forestall and suppress any situations or actions that may violate the requirements of the Russian law and applicable international law rules in the area of countering corruption.

1.5. The Bank/Group member and its employees shall not evade the requirements of this Policy by engaging counterparties, such as consultants, agents or other third parties, to do anything that violates the provisions of this Policy.

1.6. The Policy shall be the basis on which an anti-corruption system shall be build and shall operate at the Bank and Group members, and on which the Bank and Group members shall develop other internal regulatory documents (hereinafter, “IRD”) in the field of countering corruption.

2. Goals and objectives of the anti-corruption system

2.1. The main goals of the anti-corruption system shall be to take precautions against, identify, forestall and mitigate corrupt activities on the part of employees.

2.2. The main objectives of the anti-corruption system shall be to:

- establish the principles and rules for countering corruption at the Bank/Group members;
- align Bank/Group member personnel, as well as customers, counterparties, partners, shareholders (members), investors, and other stakeholders, in their understanding of the anti-corruption principles and rules applied at the Bank/Group member;
- create effective mechanisms, procedures, control and other activities aimed at countering corruption and minimizing the risks of the Bank/Group members, or Bank/Group member employees becoming involved in corrupt activity;
- foster a culture of ethical conduct and intolerance to all manifestations of corruption, including a common standard for employee anti-corruption conduct;
- integrate anti-corruption principles into governance and management activities at all levels of the Bank/Group member operations;
- keep Bank/Group member management bodies of any corruption offenses and measures undertaken to counter corruption;
- make sure that any corruption offense will carry punishment.

3. Corrupt actions

3.1. In accordance with the laws of the Russian Federation and applicable international law rules in the area of countering corruption, and for the purposes of this Policy, corrupt actions are those listed in Para. 3.2 of this Policy, committed:

- in relation to the Bank/Group member or on behalf or in the interests of the Bank/Group member in relation to third parties, including officials, persons performing managerial functions in commercial or other organizations, their employees, government, or municipal, or Bank of Russia personnel, members of management bodies and representatives of legal entities;
- with whatever purpose, including the simplification of administrative, bureaucratic or other formalities (including payments for such simplification of formalities) and other procedures in any form, securing competitive or other benefits associated with corruption practices;
- directly or indirectly;
- personally or via third parties;
- in any form, including by promising/offering/soliciting/asking for/receiving/giving/permitting to give monies, values, other property, or monetizable services, other property rights.

3.2. Corrupt actions committed in relation to, for the purposes of, in the forms, and using the methods indicated in Para. 3.1 of the Policy shall include:

- the giving and receiving of bribes for doing/refraining from doing anything for the benefit of the bribe giver or those represented by him/her, if such actions/inactions are part of the bribed party's official duties, or if such person is capable of, by virtue of his or her office, facilitating such actions/inactions, as well as overall patronage or acquiescence at work;
- intermediation in bribery, i.e. immediate giving of a bribe at the request of either the briber giver or the bribed party, or other facilitation in achieving or consummating a bribing arrangement between them;
- promising or offering such intermediation in bribery;
- a kickback, i.e. unlawful giving to a person that performs managerial functions in a commercial or another entity, of monies, securities, other property, or unlawful provision to such person of monetizable services in return for any action/inaction for the benefit of the giver or any other persons, if such action/inaction are part of such person's official duties, or if such person is capable of, by virtue of his or her office, facilitating such actions./inactions;
- intermediation in a kickback, i.e. immediate transfer of the item intended as kickback (illicit payment) on behalf of the giver, or the recipient, of the kickback, or other facilitation in achieving or consummating a kickback arrangement between them;
- promising or offering such intermediation in a kickback;
- unlawful giving to an arbitrator (adjudicator), a contracting officer, a contract manager, a member of a procurement commission, a person responsible for taking over any delivered goods, performed work or provided services, or another competent person representing the customer in the area of government or municipal procurement of goods, work, or services, of monies, securities, or other property, as well as unlawful provision of monetizable services to any such person, or provision of other property rights in return for anything done/omitted in the interests of the giver or other persons;
- provocation of a bribe, a kickback, or a graft in the area of government or municipal procurement of goods, work, or services, i.e. an attempt at giving to a person, without his or her consent, of monies, securities, or other property, or provision of monetizable services to such person, or of other property rights for the purposes of fabricating incriminating evidence, or of blackmail;
- offering, promising, or providing any illicit advantages of property or other nature to a foreign official, or in favor of such official or a third party, with a view that such official would do or refrain from doing something by way of performing his or her official duties for the purposes of

receiving or retaining any commercial or other illicit advantage in connection with a cross-border commercial transaction;

- bribing the Bank of Russia employees, i.e. giving or promising to give to such employees any financial or other benefit or advantage for the purpose of influencing their official duties, with a view to secure or retain business, gain competitive or other advantages for the Bank/Group member, or breach any courses of action or procedures prescribed by the laws of the Russian Federation;
- members of management bodies and employees of the Bank/Group member taking advantage of their official positions and/or powers, to gain financial or other benefit or advantage not provided for in the laws of the Russian Federation and/or Bank/Group member's IRD;
- other abuse of office contrary to the legitimate interests of the Bank/Group member, the public, or the state, for the purposes of gaining any financial or other benefit or advantage.

3.3. It shall be prohibited for Bank/Group member employees to engage in any activities described in Para. 3.2 of this Policy.

4. Main Measures and Dimensions of Anti-Corruption System

There is an anti-corruption system in place at the Bank/Group member, embodied in the activities of the Bank/Group member management bodies and employees, within their respective terms of reference, aimed at:

- fostering in employees zero tolerance towards corruption in any form or manifestation (the zero tolerance principle);
- fostering corporate and social responsibility in the area of countering corruption;
- preventing corruption offenses;
- mitigating and/or remediating the consequences of corruption offenses;
- prosecution of those involved in corruption offenses.

To efficiently identify, assess and mitigate corruption risks in the Bank/Group member, the following measures shall be applied:

- communicating the Policy/Group Member Policy provisions to all Bank/Group member employees;
- compulsory employee training with subsequent testing for knowledge and understanding of the main provisions of this Policy/Group Member Policy;
- taking of disciplinary action against those involved in corruption offenses;
- assessing corruption risks, in particular, by identifying Bank/Group member areas of activity and business processes most exposed to such risks, and developing appropriate anti-corruption measures;
- verifying the economic feasibility of projects, transactions, and operations in Bank/Group member areas, types of operations, and business processes most exposed to corruption risks;
- maintaining full and credible records and documenting all payments made by the Bank/Group member;
- conducting an anti-corruption experts review of Bank/Group member IRD and organizational-administrative documents (hereinafter, "OAD"), and organizational/management documents of the Bank and any proposed agreements, contracts, and arrangements;
- The Bank Executive Board Chairman and CEO, First Deputy Executive Board Chairpersons, Deputy Executive Board Chairpersons, the Bank Chief Accountant (hereinafter, the "Sberbank Executives") setting tone at the top by observing any restrictions, prohibitions, and obligations

prescribed by federal laws and other statutes and regulations for anti-corruption purposes, including disclosure of incomes, expenses, property and obligations in the nature of property in respect of themselves, their spouses and minor children;

- evaluating and processing any incoming information on any intended or actual corruption offenses or any instances of engaging with employees with the intention of inducing corruption offenses;
- setting rules and restrictions on the handling of gifts and business hospitality tokens, as well as in respect of hospitality expenses;
- setting the principles of disclosure on conflicts of interest, management decision-making mechanisms and standards of employee conduct if a conflict of interest occurs;
- assessing conflicts of interest, including potential ones (hereinafter, “conflict of interest”), of candidates for hire and Bank/Group member employees;
- applying relevant requirements to candidates for executive positions, as prescribed by the law and/or Bank/Group member IRD;
- establishing procedures for assessing, analyzing and selecting Bank/Group member counterparties, as well as rules for interacting with them;
- openness and publicity of the Bank/Group member activities (subject to restrictions on the dissemination of confidential information).

Bank/Group member executives and heads of Bank/Group member units shall, in connection with appraising, incentivizing, or relocating an employee, take into account any information on the employee’s prolonged, impeccable, and efficient performance of his or her duties taking into account the anti-corruption requirements in effect at the Bank/Group member, as well as on their diligent implementation of other compliance procedures and norms of ethical business conduct

4.1. Setting Up the Compliance Hotline

4.1.1. The Bank/Group member shall provide for the functioning of a Compliance Hotline¹, a safe and confidential 24/7 channel intended for reporting, by Bank/Group member employees and third parties (including customers, counterparties, Bank/Group member partners), of any compliance violations (for the Bank, in accordance with /14/), including information on:

- violations of Bank/Group member’s anti-corruption IRD and OAD;
- any suspicions, intentions and/or facts of corrupt conduct of Bank/Group member employees;
- omissions on the part of Bank/Group member employees encouraging corrupt conduct;
- instances where any persons engaged with Bank/Group member employees with the purposes of inducing corruption offenses.

4.1.2. The Bank/Group member shall guarantee implementation of the following main principles of the Compliance Hotline functioning: confidentiality (Para. 4.1.4), anonymity (Para. 4.1.5), accessibility (awareness of existence and an unobstructed ability to send a report), continuous availability (reports accepted on a 24/7 basis), impartiality (Para. 4.1.6), promptness (prompt initial analysis and registration of calls), integrity and no retaliation (Paras. 4.1.8, 4.1.9).

4.1.3. If a Bank/Group member employee comes in possession of any information described in Para. 4.1.1 of this Policy, he or she shall report it to the Compliance Hotline.

¹This hotline may be named differently at a Group member.

4.1.4. The caller who disclosed his or her personal data at the time of making the call shall remain anonymous to all except those authorized to register and verify his or her report.

4.1.5. The Bank /Group member shall enable all callers to report anonymously to the Compliance Hotline (i.e. without disclosing anything that would allow to identify the caller), and shall guarantee that such reports will be reviewed provided that the information contained therein is sufficient for verifying the facts/circumstances described in the report.

4.1.6. Any information reported to the Compliance Hotline shall be allowed to proceed regardless of the official position of the reporting person, or of the person in respect of whom it was reported.

4.1.7. The time frame for reviewing a report received via the Compliance Hotline and for providing feedback to the caller shall generally be not more than 30 calendar days. If additional verification/internal investigation is undertaken, this time frame may be extended.

4.1.8. The Bank/Group member shall guarantee that the caller will not face any retaliatory action or any other adverse consequences if he or she reported in good faith and without malicious intent, but the information contained in the report was disproved in subsequent review. If however it is found that the Bank/Group member employee maliciously reported any deliberately misleading information (for example, with the purpose of doing harm, belie, gain some preference or avoid responsibility), corrective action shall be taken against such an employee in accordance with the applicable law and/or Bank/Group member's IRD and OAD. Similarly, a reporting employee who refused to be involved in corrupt activity shall not face any retaliatory action or any other adverse consequences, even if such refusal caused economic damage to the Bank/Group member, in particular, in the form of lost competitive or other advantage.

4.1.9. All heads of the Bank/Group member units shall not hinder or restrict the Bank employees in using the Compliance Hotline, nor Bank/Group member employees who contacted the Compliance Hotline to retaliatory action or other adverse consequences, including demotion, dismissal, forfeiture/curtailment of bonuses, prejudice in making any decisions regarding them, or harassment of such employees in any form. If a Bank/Group member employee who called the Compliance Hotline faces retaliatory action or other adverse consequences, he or she may report this to the Compliance Hotline.

4.1.10. The Bank shall provide the following methods of calling the Bank Compliance Hotline²:

- a voice message to +7 (495) 665-86-09;
- a written report using (non-anonymous and anonymous) feedback forms posted in the "Compliance" section of the bank official website (<https://www.sberbank.com/ru/compliance/hotline#form>);
- an e-mail message to ethics@sberbank.ru;
- An ordinary mail message to: 117997, Moscow, Vavilova St., 19, Sberbank Compliance Division, marked "Compliance Hotline".

4.1.11. The process and procedure for reviewing reports to the Bank Compliance Hotline, as well as process participants. their functions and terms of reference are set out in /14/.

4.2. Anti-corruption measures in relations with customers, counterparties, and partners

4.2.1. The Bank/Group member expects that its customers, counterparties, partners, representatives, members of management bodies and employees shall comply with anti-corruption principles, requirements, restrictions, prohibitions, and responsibilities set out in any

² A Group member shall determine its own methods of contacting its Compliance Hotline and shall describe them in the Group Member Policy.

agreements/contracts/arrangements between the Bank/Group member and them, in Bank/Group member IRD and OAD extending thereon, or directly follow from the requirements of the applicable laws, including the national laws of those persons' countries of registration and/or operation, and from the applicable rules of international law.

4.2.2. The Bank/Group member shall make efforts that are reasonable and affordable under the circumstances to mitigate the risk of violating applicable laws and applicable rules of international law in the area of countering corruption, at the time of establishing business relationships with customers, counterparties and partners that have been or may be involved in corrupt activity. In so doing, the Bank/Group member shall:

- screen the business reputation of potential counterparties, their executives, shareholders (members) and beneficiaries in the manner applied by the Bank/Group member, in particular, for their tolerance towards corruption;
- communicate to potential customers, counterparties, and partners the anti-corruption principles and requirements, in particular, by incorporating, when appropriate, the anti-corruption clauses into agreements, contracts, and arrangements, or other similar documents with such persons entered into by the Bank/Group member, as well as by posting information on the Bank³/Group member official website;
- take into account the willingness of potential counterparties and partners to comply with the principles and requirements in the area of countering corruption, and to provide mutual assistance with the purpose of identifying, avoiding and forestalling corruption offenses in such relationships.

4.2.3. The Bank/Group member may abstain from, limit or terminate collaboration with counterparties and partners who engage in, or tolerate, corruption offenses in their activities.

4.2.4. The Bank/Group member shall not engage any third parties, including customers, counterparties, partners, for the performance of any actions that may be regarded as corrupt or unethical.

4.2.5. When establishing and maintaining business relations with customers, counterparties and partners, Bank/Group member shall not breach any restrictions imposed by anti-corruption measures publicly disclosed by such persons on their official websites.

4.2.6. The Bank/Group member employees shall not solicit any illicit compensation from any third parties, including customers, counterparties and partners.

4.2.7. The requirements of this Policy/Group Member Policy shall be taken into account by the Bank/Group member when entering into contractual or other business relations with individuals and legal entities.

4.3. Notifications of hiring former government and municipal officials

In accordance with /1/, if an employment contract or a civil contract for performance of work (provision of services) is entered into with a person that previously held certain government or municipal offices, within two years after his or her retirement from such government or municipal service, the HR department of the Bank/Group member shall notify a representative of such person's most recent employer in the manner prescribed by statutes and regulations of the Russian Federation and the Bank/Group member IRD (in particular, by /15/).

4.4. Managing conflicts of interest

4.4.1. For the purposes of proper conflict of interest management, a separate document /16/ has been developed in the Bank; this document is freely accessible on the Bank's official website³.

³ In the "Compliance" section

4.4.2. The Bank/Group member shall mitigate and forestall the risk of a conflict of interest through a mechanism whereby employees would disclose such conflict of interest, in particular:

- at the time of hiring;
- whenever situations arise that have caused and/or may cause a conflict of interest;
- on an annual basis;
- in other cases, prior to certain events and/or receipt of certain kinds of information.

4.4.3. In order to avoid, forestall and resolve conflicts of interest, the Bank/Group member employees shall be required to:

- take measures to exclude any possibility of a conflict of interests occurring, or to resolve a conflict of interest that has already occurred;
- disclose information on any existing or potential conflict of interest, as soon as they become aware of it, in accordance with Bank/Group member IRD;
- minimize the risk of conflicts of interest in the performance of their job duties.

4.4.4. Forestalling or resolving a conflict of interest may amount to:

- changing the range of tasks and specific assignments performed by an employee that is a party to a conflict of interest, by way of his or her job duties;
- the employee refusing the benefit (advantage) that caused the conflict of interest (e.g. refusing to work with a particular, customer, counterparty or partner, refusing to participate in the preparation of a deal, etc.);
- considering a candidate for employment with the Bank/Group member, for another unit and/or another position;
- making the immediate supervisor of the employee who is party to the conflict of interest responsible for the taking of action aimed at forestalling the conflict of interest;
- changing the employee's job duties in coordination with the employee and/or the employee's terms of reference, including changes to the range of tasks and specific assignments performed by the employee as part of his or her job duties.

4.4.5. If a conflict of interest arises, the Bank/Group member shall prioritize customers' interests. If a conflict of interest arises between an employee and the Bank/Group member and such conflict of interest cannot be eliminated, the interests of the Bank/Group member shall prevail over the personal interests of employees.

4.5. General Rules and Restrictions on Handling Gifts and Business Hospitality Tokens

4.5.1. The main goals and objectives of regulation, rules and restrictions in the area of receiving and giving of gifts and business hospitality tokens in the course of business interaction are set out in /17/.

4.5.2. Any purchases of gifts at the expense of the Bank/Group member and their subsequent giving to third parties shall be properly documented, accounted for and reflected in the financial statements of the Bank/Group member; in particular, the details of the gift recipient shall be recorded.

4.5.3. The Bank/Group member has in place a list of prohibited gifts and business hospitality tokens, as well as the criteria for being eligible to receive and give gifts and business hospitality tokens, including the reasons for receiving and giving gifts.

4.5.4. Any prohibited gifts, as well as gifts that do not meet the eligibility criteria shall be politely rejected by the employees of the Bank/Group member at the time of being offered such gifts.

4.5.5. Under no circumstances shall Bank/Group member employees be allowed to either receive or give gifts and business hospitality tokens that may impact objective and impartial decision-making, any action/inaction in relation to customers, counterparties, partners, the Bank/Group member and any third parties, or expose employees, customers, counterparties, partners to obligations, or damage the business reputation of the Bank/Group member.

4.5.6. At the time of assessing the possibility of receiving or giving a gift, each Bank/Group member employee shall take guidance in the following criteria:

- the reason matching what is obvious and generally accepted at the Bank/Group member;
- neither the gift nor the reason for receiving or giving it shall give rise to a conflict of interest, or damage the business reputation of the Bank/Group member;
- the value of the gift shall not exceed the limit set at the Bank/Group member;
- the gift not being on the prohibited gifts list.

4.5.7. The Bank/Group member requires that employees notify their employer of any gifts received, rejected or returned by them, as well as of any gifts given to officials. The Bank/Group member requires that employees seek approvals on any planned employee participation, upon invitation by a third party, in an entertainment event/sending to a third party, on behalf of the Bank/Group member, an invitation to an entertainment event, or planned employee participation in educational events, upon invitation by a third party, under certain defined circumstances.

4.5.8. Gifts from third parties to any relatives or other persons close to the Bank/Group member employee shall not be allowed if intended in return for services, decision, action/inaction, acquiescence or patronage, grant of rights by such employee or representing an attempt to influence such employee for any illicit or unethical purpose.

4.5.9. The Bank/Group member has in place special rules and restrictions in respect of business hospitality tokens upon interaction with any officials, as well as in respect of receiving of gifts by Sberbank Executives, in accordance with the laws of the Russian Federation.

4.5.10. It shall not be permitted to give gifts, other than ordinary gifts not exceeding 3,000 rubles in value, to persons occupying government posts at the level of the Russian Federation, government posts at the level of the regions of the Russian Federation, municipal posts, members of government personnel, members of municipal personnel, the Bank of Russia personnel, in connection with their official positions or in connection with their performance of office duties, as well as to officials. This prohibition shall not apply to gift given in connection with official entertainment, business trips and other official events.

4.6. Charitable activity

4.6.1. The objectives, general principles and areas of the Bank charitable activity, as well as the design of the charity management process at the Bank are set out in /18/.

4.6.2. The Bank shall give charity to target groups via non-commercial organizations. The Bank shall not give charity, either directly or indirectly, to any commercial organizations, political parties, or for the purpose of engaging in political activity, or to foreign government organizations.

4.6.3. A decision to give charity to non-commercial organizations shall be made by the competent collegial bodies of the Bank.

4.6.4. The following shall be performed in the course of charitable activity:

- control of cost estimates and expenses across the Bank as a whole;
- legal expert review of the constitutive documents submitted by legal entities applying to the Bank for charitable assistance;

- verification of the information submitted by legal entities applying to the Bank for charitable assistance;
- expert review of applications made by non-commercial organizations by relevant Bank units and, if the Bank so resolves, with the involvement of third-party experts;
- transfer to non-commercial organizations, on the basis of a formal agreement, of funds allocated by the Bank by way of charity;
- control that the charity given is used by non-commercial organizations in accordance with its intended purposes.

4.6.5. The Bank shall make sure that the recipient of charity is a bona fide charity foundation or any other non-commercial organization, and that there was no reason to assume that such foundation or another organization is operated directly or indirectly with a view to earn profit, in particular, in favor of a government or municipal official or his or her close relatives.

4.6.6. The procedure for the Bank's charitable activity is set out in /19/.

4.7. **Sponsorship activity**

4.7.1. The objectives and main areas of Bank sponsorship activity are set out in /20/.

4.7.2. The expediency of the Bank's participation in a sponsorship project shall be determined subject to, among other things, analysis of the following parameters:

- whether the project fits with the Bank image;
- whether the cost of the sponsorship package is consistent with the advertisement services and non-advertisement opportunities provided therein;
- whether the target audience of the intended communication media matches the target audience of the Bank;
- experience of collaboration with the arranger;
- past experience of participation in the project;
- the proposed number of sponsors.

4.7.3. The Bank shall engage in sponsorship activity on the basis of a fee-based service agreement, i.e. a sponsorship agreement. By participating in a sponsorship project, the Bank expects a tangible return on the funds spent. The advertisement support shall be reflected in the sponsorship agreement directly and in an amount commensurate to the sponsor contribution. After the event, the sponsored party shall report on the advertisement space provided in accordance with the terms and conditions of the sponsorship agreement and the applicable law.

4.7.4. The procedure for the Bank sponsorship activity is set out in /21/.

4.8. **Public and political activity**

4.8.1. The Bank/Group member shall neither participate in nor finance the activities of political organizations.

4.8.2. The Bank/Group member shall neither participate in nor finance the activities of religious and other organizations whose mission is to disseminate religious view, beliefs, or worships.

4.8.3. Bank/Group member employees engaging in any political, religious or other public activities may only do so in their private capacity and not in the capacity of Bank/Group member representatives, and only during their off-duty hours.

4.8.4. Campaigning for any political party or any candidate to a political post, or preaching, by Bank/Group member employees of their political and religious views and beliefs anywhere within the Bank/Group member territory shall be prohibited.

4.8.5. The Bank/Group member shall not make political contributions to non-commercial organizations, political parties, candidates to political posts, politicians, or any legal entities and individuals associated therewith, on behalf of the Bank/Group member.

5. Key anti-corruption system participants, their roles and responsibilities

5.1. The Supervisory Board of the Bank shall:

- formulate, and support the implementation of, the standards of ethical conduct, including zero tolerance towards any forms and manifestations of corruption;
- exercise overall control over corruption countering and measures taken in this area.

5.2. The Executive Board of the Bank shall:

- approve this Policy;
- be responsible for ensuring that the Bank operations complies with the requirements of applicable anti-corruption laws;
- implements the principles of zero tolerance towards any forms and manifestations of corruption at all levels; members of the Executive Board shall serve as the personal example of ethical conduct in the Bank;
- monitor the compliance with this Policy, and in particular, make sure that any matters are efficiently and promptly resolved by other bodies and units within the anti-corruption system;
- determine the need for representatives of the Compliance Department of the Central Head Office to participate in the work of the Bank collegial bodies.

5.3. The Compliance Committee of the Bank shall:

- review reports, consider and make decisions on matters in the area of countering corruption in accordance with /22/.

5.4. The Compliance Committee of the regional bank shall:

- review and make decisions on anti-corruption matters within its terms of reference in accordance with /23/.

5.5. The Compliance unit shall:

- develop a general methodology in the field of countering corruption, participate in the approval of documents issued by Bank units as regards countering corruption, and support uniformity of approaches across Group members, in particular, by providing consulting and methodological support;
- take part in the implementation of anti-corruption procedures and activities at the Bank/Group member;
- perform anti-corruption expert reviews of IRD and OAD, agreements, contracts and arrangements of the Bank/Group member, in particular, at the stage of their drafting and approval, if so requested by interested drafters;
- notify the security unit on any intended or actual corrupt conduct on the part of the Bank/Group member employees;
- initiate and/or participate in official investigations and audits in the field of countering corruption, and, if necessary, engage representatives of the Bank/Group member units within

their respective terms of reference, as well as the immediate supervisor of the employee against whom the in-house investigation/audit is to be conducted/investigated, in such in-house investigation/audit;

- draft training materials in the area of countering corruption;
- consult Bank/Group member employees on anti-corruption matters;
- submit to the Compliance Committee of the Bank/regional bank any matters that fall within the functions of those committees in accordance with /22/ and /23/;
- develop recommendations for the Bank/Group member management on the elimination of causes and conditions that facilitate corrupt practices among the Bank/Group member employees.

5.6. The Security unit shall:

- prepare for and conduct events aimed at identifying and suppressing corrupt actions of Bank/Group member employees;
- conduct anti-corruption expert reviews of documents in respect of procurement procedures conducted by the Bank/Group member;
- act as the initiator of in-house investigations/reviews and conduct in-house investigations/reviews within its terms of reference;
- cooperate with law enforcement authorities in terms of submitting materials on any identified facts of corrupt conduct on the part of Bank/Group member employees with the purpose of holding them responsible in accordance with the applicable law;
- take action to protect the Bank employees from the influence of others whose acts aim at setting up corrupt schemes and practices at the Bank/Group member;
- cooperate with the Compliance unit to identify and verify information on intended or actual corrupt conduct on the part of the Bank/Group member employees;

5.7. The HR unit shall:

- make sure that new hirers are made aware of the Policy/the Group Member Policy at the time of hiring;
- participate in disciplinary action taken against employees for violations of the requirements of Bank/Group member's IRD and OAD in the area of countering corruption;
- notify, under certain circumstances and following a certain procedure, in connection with the entering into an employment contract or a civil contract with an individual who previously held certain government or municipal posts, a representative of such person's most recent employer.

5.8. Members of collegial and working bodies and their substitutes shall:

- identify areas, types of activities and business processes exposed to high level of corruption risks.

5.9. Bank/Group member unit leaders, immediate supervisors of employees shall:

- identify areas, activities and business processes exposed to a high level of corruption risks, taking guidance in the scope of authority and the range of functions assigned to such units, develop and take measures to minimize such risks;
- set an example of conscientious and ethical behavior;
- focus subordinate employees on unconditional compliance with the provisions of the Policy/Group Member Policy;
- make sure that subordinate employees comply with the provisions of the Policy/the Group Member Policy;

- make sure that subordinate employees complete mandatory anti-corruption training courses and programs in a timely manner;
- initiate disciplinary action against subordinate employees for violation of the requirements of the Bank/Group member IRD and OAD in the field of countering corruption in the manner that applies at the Bank/Group member;
- take into account how long, impeccable and effective are the subordinate employees' records of their performance of their anti-corruption duties at the time of appraising their personal performance for personnel incentive purposes.

5.10. All Bank and Group members' personnel shall:

- strictly comply with the requirements of the applicable law and applicable rules of international law in the area of countering corruption, the Policy/Group Member Policy provisions, as well as with the principles of professional ethics and ethical norms of business conduct;
- comply with the principles, requirements, restrictions, prohibitions and responsibilities proscribed in Bank/Group member IRD and OAD for the purposes of countering corruption;
- when performing their employment duties or doing business on behalf of the Bank/Group member in any countries of the world, comply with national laws (local laws of foreign countries) and applicable rules of international law in the field of countering corruption, as well as the provisions of the Policy/the Group Member Policy, other Bank/Group member IRD and OAD in the field of compliance;
- refrain doing anything or making any decisions that may result to corruption offenses;
- complete mandatory anti-corruption training courses and programs in a timely manner;
- interact with the Compliance unit on all corruption countering matters, and in particular, assist the Compliance unit in obtaining any necessary, objective and reliable documents, materials and information, inter alia, by providing the same at the request of the Compliance Units, keeping with the prescribed time frames;
- inform the Compliance unit about each known or potential violation of the provisions of this Policy⁴/Group Member Policy;
- in case of any doubt with respect to the permissibility of certain actions or other matters relating to the provisions of the Policy/Group Member Policy, seek clarification from their immediate supervisor and/or the Compliance Unit;

6. Specific features of anti-corruption system design at the Group members and Bank overseas branch

6.1. Group members shall develop and approve their own Group Member Policies in in the manner established at the Group member⁵. This Policy shall apply to Group members, and the anti-corruption system shall be designed, subject to the assumptions and provisions of /24/.

6.2. The Bank shall, through its representatives on the management bodies of Group members, contribute to the approval of the Group Member Policy by having it approved by the management body of the Group member.

6.3. The Bank's overseas branch may have a separate anti-corruption policy (hereinafter, the "Branch Policy"), if this is necessary to take into account the national legislation of the country where the Bank branch is located.

⁴ For the Bank, the Compliance Hotline, regulated by /14/, is the preferred channel for reporting such violations.

⁵The existence of such a document follows from the provisions of the documents referred to in clause 1.3 of this Policy.

6.4. If, as Group members/the Bank overseas branch draft or update the Group Member Policy/Branch Policy, they permit departure(s) from the provisions hereof or of other regulatory documents on compliance that are binding upon the Group members, such draft documents shall be subject to approval by the Compliance Division of the Bank's Central Head Office.

6.5. If Group members engage in charitable and sponsorship activity, it is recommended that they reflect, in their Group Member Policy, the provisions set out in Paras. 4.6, 4.7 of this Policy.

7. Responsibility

7.1. All Bank/Group member employees, regardless of their position, shall be personally responsible for the compliance with the provisions of the Policy/the Group Member Policy; managers shall also be responsible for exercising proper control over the actions (inaction) of their subordinate employees as regards compliance with the Policy/Group Member Policy.

7.2. Any action in circumvention of the Policy/the Group Member Policy on the part of Bank/Group member employees shall be prohibited and viewed as a violation of the Policy/the Group Member Policy.

7.3. The Bank/Group member may suffer sanctions for any corruption offenses of its employees; therefore, in-house investigations/reviews shall be carried out in case of any reasonable suspicion or revealed fact of such corrupt activity within the limits permitted by the applicable law.

7.4. Disciplinary action, up to termination of employment, may be taken against Bank/Group member employees who are found guilty of violating the provisions of this Policy/Group Member Policy as a result of the in-house investigation/review, in accordance with applicable law and the procedure established at the Bank/Group member.

7.5. The Bank/Group member may file a civil lawsuit against an employee who is guilty of corruption offenses if such offenses resulted in damage to the Bank/Group member.

7.6. Persons condemned by court as guilty of violating the anti-corruption law may be held individually liable for administrative or criminal offence in the manner and on the grounds stipulated by applicable law.

8. Final Provisions

8.1. This Policy may be amended in the event of any changes in the legislation of the Russian Federation or applicable rules of international law, or in order to incorporate new trends in the Russian and global corporate conduct practices. If changes are made to the laws of the Russian Federation before the adoption of a new version of this Policy, this document shall apply inasmuch as it is not contrary thereto. Should any provisions hereof come into conflict with the national legislation of a country where the Bank/Group member is registered and/or operates, the national legislation shall apply. Should any provisions hereof come into conflict with any customs, practices or anyone's understanding of the relevant rules of conduct, the provisions of this Policy shall apply.

8.2. By posting the Policy/Group Member Policy to be freely accessible on the Bank/Group member's official website, the Bank/Group member shall make an open statement of its intolerance towards corruption in any form or manifestation (the zero tolerance principle), and shall welcome and encourage compliance with the provisions of this Policy/Group Member Policy on the part of all Bank/Group member employees, customers, counterparties, partners and other third parties, and shall facilitate enhancement of the anti-corruption culture among personnel and the general public through outreach and training.

8.3. The Bank/Group member shall collaborate, on the principles of reciprocity, with government authorities, as well as with societies and associations whereof the Bank/Group member is part, and also customers, counterparties, and partners, for the purposes of:

- identifying those suspected in (accused of) corruption offenses, their location, as well as the location of other persons implicated in corruption offenses;
- identifying property received as a result of corruption offenses or used as a tool of such corrupt actions;
- coordinating activities aimed at the prevention of corruption offenses;
- exchanging anti-corruption information.

8.4. All employees of the Bank/Group member shall be made aware of the Policy/the Group Member Policy in the manner applied at the Bank/Group member. Each head of a standalone structural unit of the Bank/Group member shall be responsible for making sure that Policy/the Group Member Policy is properly communicated.

List of Terms and Definitions

Bank means Sberbank of Russia; Sberbank.

Political contribution means a contribution (in specie or in kind) intended for carrying out political activity or holding a political event. Contributions in specie may include both donations and loans, whereas contributions in kind may include transfers of goods, works or services. The concept of "contributions in kind" may include gifts, property loans, rendering of services, advertising activities advocating particular non-profit organizations/political parties, particular candidates for political positions/politicians or legal entities and individuals affiliated therewith, purchase of tickets to fundraising events, contributions in favor of research establishments and institutions jointly with the above-mentioned individuals or entities.

Group means Sberbank together with credit and non-credit institutions as defined in Federal Law No. 395-1 dated 02/12/1990 "On Banks and Banking", IFRS standards (IAS28, IFRS10), Bank of Russia Ordinance dated 08/10/2018 No. 4927-U (4927-Y) "Procedure for the Preparation and Submission of Form No. 0409801 Reports 'Report on the structure of banking group participants and credit institution's investments in the units of unit investment funds'".

Officials means persons occupying government offices at the level of the Russian Federation, government offices at the level of the subjects of the Russian Federation, municipal offices, government employees (federal government employees and government civil servants of a region of the Russian Federation), municipal employees regardless of their offices, in accordance with the laws of the Russian Federation; persons occupying the offices of members of the Bank of Russia Board of Directors; any appointed or elected persons occupying any office in a legislative, executive, administrative, or judicial body of a foreign state on a permanent or temporary basis, with or without compensation, regardless of such person's level of office; any person performing any public function for a foreign country, in particular, for a public agency or public enterprise as these are defined in the domestic law of such foreign country and applied in the respective area of legal regulation of such foreign country; an international civil servant or any person authorized to act on behalf of an public international organization; members of executive bodies of political parties; candidates to offices with government bodies; close relatives of the persons listed above.

Business hospitality tokens has the meaning set out in /17/.

Customer means an individual or a legal entity serviced by the Bank/Group member.

Compliance risk has the meaning set out in /24/.

Counterparty means an individual or a legal entity that is a party to a contract with the Bank/Group member, other than a customer.

Conflict of interest has the meaning set out in /16/.

Corruption offense means a committed unlawful action or inaction that displays signs of corruption.

Educational event means an educational/information course, workshop, training, learning session, program, conference, forum, or another similar event.

Partner means an individual or a legal entity having an intention to become the Bank/Group member's counterparty or customer, but not being the Bank/Group member's counterparty nor customer at the moment, or cooperating with the Bank/Group member without entering into contractual relationships.

Gift means any item of value in tangible or intangible form, which is delivered by the presenter to the receiver voluntarily and at no cost, and for which it is not mandatory to pay a usual price, received/delivered by an employee in relation to work in the Bank/Group member or delivered on behalf and at the expense of the Bank/Group member. Gifts may include cash and cash equivalents,

securities, other property, property rights, property-related benefits and services (works, services, payments for entertainment, recreation, education, transportation, loans, discounts, allowing the use of property, including accommodation, deposits, donations, etc.).

Security unit means the Intrabank Security Division of the Bank or a corresponding unit of a Group member.

Compliance unit means the Compliance Division of Central Head Office of the Bank, or the Compliance Division of a regional bank, or a corresponding unit/authorized officer of a Group Member.

HR unit means the HR Competencies Department of Central Head Office of the Bank/HR Administration Center (centrally subordinated unit), or an HR unit of a regional bank, or a corresponding unit of a Group member.

Group Member Policy means the Anti-Corruption Policy of the Group member or other document of the Group member with provisions similar to those set forth in the Policy, to the extent not inconsistent with the national legislation of the country of the Group member.

Compliance Procedure means a set of measures that constitutes either an independent process or is integrated into various stages of other processes, and is properly regulated, conducted on a continuous basis, and aimed at managing the compliance risk.

Employee – an individual having employment relations with the Bank or the Group member.

Entertainment event means any service in the form of an invitation to cultural and sporting events given either on behalf of and(or) at the expense of the Bank/Group member to a third party, or on behalf of and(or) at the expense of a third party to an employee of the Bank/Group member in connection with the performance of his/her employment duties, accompanied by visiting theaters, exhibitions, concerts, sporting competitions and other leisure places in the form of the provision of invitations to such events held by third parties.

Employment duties mean official and/or functional duties.

Group member means an organization being a part of the Group, other than the Bank.

List of Reference Documents

1. Federal Law No.273-FZ (273-ФЗ) dated 25/12/2008, “On Countering Corruption”.
2. the United Nations Convention Against Corruption dated 31/10/2003.
3. Council of Europe Criminal Law Convention on Corruption of 27/01/1999.
4. the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions dated 21/11/1997.
5. International standard ISO 37001:2016 “Anti-bribery management systems - Requirements with guidance for use”.
6. International standard ISO 37301:2021 “Compliance management systems - Requirements with guidance for use”.
7. Program of anti-corruption ethical norms and ensuring compliance with anti-corruption requirements for businesses. Practice guidelines developed by the United Nations Office on Drugs and Crime.
8. Guidelines on developing and taking anti-corruption measures by organizations, developed by the Russian Ministry of Labor and Social Protection.
9. Measures to prevent corruption in organizations, developed by the Russian Ministry of Labor and Social Protection.
10. Anti-Bribery and Anti-Corruption Compliance Program Guidance adopted by the Wolfsberg Group in July 2017 (Bank of Russia’s Information Letter No. ИИ-014-12/64 (IN-014-12/64) dated 27/12/2017 On Application of the Risk-Based Approach to AML/CFT).
11. The US Foreign Corrupt Practices Act.
12. The United Kingdom Bribery Act.
13. The French Transparency, Anti-Corruption and Economy Modernization Act (Sapin II).
14. Process Chart for Organization of Sberbank Compliance Hotline Work No. 3974 (as amended).
15. Standard operating procedure “URM Course of Action Upon Hiring Ex-Government or Municipal Employee” (as amended).
16. Conflict of Interest Management Policy of Sberbank Group No. 3369 (as amended).
17. Sberbank Group Standard for Handling Gifts and Business Hospitality Tokens (Part 2 of Sberbank Book of Standards for Compliance Risk Management Standards No. 4403) (as amended).
18. Sberbank Charity Policy No. 5033 (as amended).
19. Sberbank Regulations on Charitable Activities No. 4804 (as amended).
20. Sberbank Marketing Policy No. 2329 (as amended).
21. Sberbank Regulation on Sponsorship Activity No. 2029 (as amended).
22. Regulation on the Compliance Committee of Sberbank No.2886 (as amended).
23. Regulation on the Compliance Committee of a regional bank of Sberbank No. 2887 (as amended).
24. Sberbank Group’s Compliance Risk Management Policy No. 2885 (as amended).