

**Sberbank Code
of Corporate Social Responsibility
for Procurement Activities**

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1. General Provisions

1.1. For the purposes of this Code, the corporate social responsibility (hereinafter, CSR) for procurement activities¹ of Sberbank means an aggregate of voluntarily assumed commitments to implement internal and external projects and accomplish tasks intended to raise the level of economic, social, and environmental development of society and the state.

1.2. The purpose of this Code is to establish fundamental CSR policies, principles, rules and approaches followed by Sberbank in carrying out its procurement activities.

1.3. The CSR purposes of Sberbank's procurement activities include:

- Promoting a high level of domestic and international economic development
- Creating a favorable and safe work environment for our employees
- Achieving and maintaining the status of a socially responsible company
- Achieving social progress for society and the state
- Improving the environmental efficiency of organizing and performing procurement

activities.

1.4. In accomplishing its CSR objectives, Sberbank (hereinafter, the Bank) applies ISO 26000, international rules of conduct and principles established by international CSR and sustainability standards. The Bank considers the use of the international CSR standards as a prerequisite for ensuring the compliance of the Bank's activities with the best international practices and for achieving the goals and objectives of its development.

1.5. By adopting this Code, the Bank confirms its commitment to the strict compliance with the laws, ethical and business norms of conduct and to doing its business on the basis of good faith, fairness and honest relationships with all stakeholders, while taking into account the international CSR standards.

1.6. In planning, organizing and carrying out its procurement activities, the Bank may, while abiding by the provisions of this Code or other CSR-related internal regulatory documents, require that participants in procurement and accreditation procedures and the Bank's counterparties under any signed (and/or contemplated) contracts comply with the CSR principles by incorporating such requirements in any notifications, documentation or other types and forms of documents supporting purchases/signing or execution of contracts.

1.7. The Bank's business units supervising its subsidiaries and affiliates, as well as the Bank's representatives in its subsidiaries, affiliates or subsidiary banks may, as part of their authority, initiate preparation of relevant documents of subsidiaries, affiliates or subsidiary banks in the area of CSR for procurement activities taking into account the provisions of this Code.

¹Procurement activities means the Bank's activities aimed at meeting the Bank's needs for Products (goods, works, or services), including for support of its banking activities (banking operations and transactions performed under a license issued by the Bank of Russia).

2. CSR Principles for Sberbank's Procurement Activities

2.1. In carrying out its procurement activities, the Bank abides by the following CSR principles:

2.1.1. **Transparency** – the Bank strives to ensure the transparency of its decisions and activities that affect society, the economy and the environment, and to timely make such information available to stakeholders to enable them to accurately assess the impact of the Bank's decisions and activities on their interests.

The Bank carries out its procurement activities in accordance with the laws of the Russian Federation, as well as with the adopted and approved Procurement Regulations of Sberbank² posted in open sources on the web.

Provided, however, that the transparency principle does not imply the disclosure by the Bank of any restricted or confidential information or any information the disclosure of which could cause a violation of any legal, commercial, security or privacy obligations.

2.1.2. **The rule of law and of international norms of conduct** – in its procurement activities, the Bank follows the principle of the rule of law. The Bank understands that all regulations should be governed by laws and thus subordinates its internal regulatory documents to the law, recognizing that laws apply equally to everyone without exception and that no one can be exempted from responsibility for their own actions.

In carrying out its procurement activities, the Bank complies with any applicable laws and regulations in that area, takes steps to identify and study any applicable laws and regulations, informs its employees about responsibility for non-compliance, and promotes relevant and timely measures to ensure compliance with the laws.

2.1.3. **Professionalism** – the Bank encourages its employees to gain a deep knowledge in their competence areas, and creates conditions for improving and unlock their professional skills and personal abilities.

2.1.4. **Mutual respect** – good will in the course of cooperation, respect for the time and interests of co-workers and Suppliers³.

2.1.5. **Thrift** – a responsible approach to using the Bank's resources, reasonable consumption and accurate projection of needs.

3. Interaction with Suppliers in Carrying Out Procurement Activities

3.1. The Bank's performance directly depends on the good faith of Suppliers, the quality and safety of goods, works and services supplied by them, their responsibility in discharging their obligations, and on their business reputation.

3.2. The Bank builds its cooperation with Suppliers on the basis of a fair and responsible partnership. The core principles of Supplier selection are ensuring fair competition and providing equal opportunities for all potential Suppliers.

3.3. The Bank aims to cooperate with Suppliers that have an impeccable business reputation, abide by the principles of strict compliance with the laws, business ethics and fair partnership requirements, ensure occupational health and safety for their employees, and demonstrate care for the environment.

3.4. The Bank may impose requirements on those who participate or wish to participate in its procurement procedures, in order to:

²Procurement Regulations of Sberbank (Version 3) dated 04.06.2020 No. 2348-3 (as amended).

³Supplier (Contractor) means a legal entity or an individual (including individual entrepreneurs) that supplies Products or Services.

- review the professional competence and the level of public and social responsibility of a potential Supplier
- exclude the possibility of entering into a partnership with any bad-faith market participants
- promote sustainable development and public well-being
- increase the transparency of Sberbank Group and improve its governance.

4. Occupational Safety

4.1. The Bank builds relationships with its employees on the basis of fairness, mutual respect and trust, creates a favorable and safe work environment, and provides opportunities for employees to realize their potential and upgrade their skills.

4.2. The Bank implements social projects to improve the work environment.

4.3. The remuneration system adopted by the Bank aims to promote motivation and to attract the best-qualified talent. Ongoing employee performance assessments inform timely decisions on pay raises, incentives, additional perks and benefits for employees.

4.4. The Bank respects the rights and freedoms of its employees and guarantees protection from discrimination in any form, including on political, racial, or religious grounds. The Bank expects similar behavior from its Suppliers and encourages the creation of an inclusive and favorable work environment.

4.5. The Bank expects its Suppliers to demonstrate commitment to an active policy aimed at creating a comfortable work environment, providing occupational safety, and preventing discrimination in any form.

4.6. The Bank has zero tolerance for child labor. In accordance with the requirements of the Constitution of the Russian Federation and its labor laws, Suppliers may not use child labor in their activities.

4.7. The Bank has zero tolerance for slave, prison, forced or bonded labor. Suppliers may not use forced, tied or involuntary labor of prisoners in their activities.

4.8. The Bank's Suppliers should use every effort to provide workplace safety for their employees. Activities to identify and assess potential workplace accidents, as well as the development of measures to minimize their impact on employees by creating evacuation contingency plans and rapid response procedures, are mandatory.

4.9. The Bank expects its Suppliers to strive to adopt similar principles and making voluntary commitments.

5. Environmental Protection

5.1. The Bank acknowledges its responsibility towards society and thus carries out its procurement activities in accordance with the requirements of the Russian Federation laws in the area of environmental protection. The Bank builds its environmental policy on the basis of a rational and careful attitude towards natural resources and the environment.

5.2. To minimize their environmental and climate footprint, Suppliers should strive to use such methods as production process upgrades, maintenance and process support, replacement of production materials, and materials storage for recycling. Suppliers are encouraged to participate in the development and use of products and processes that help minimize energy consumption and greenhouse gas emissions.

5.3. The Bank may impose requirements on Suppliers aimed at environmental protection, including: using systems allowing for safe processing, movement, storage, recycling, re-use and management of waste, air emissions and waste water; and using advanced technology to prevent accidental spills or air pollution.

5.4. The Bank expects its Suppliers to define their own environmental policies aimed at promoting a rational and careful attitude towards the environment among their employees.

6. Counteracting Corruption

6.1. The Bank expects its employees to strictly comply with anti-corruption laws and abstain from any forms of illegal influence on decisions made by authorized persons or for accomplishing any other purposes: the Bank's employees are under no circumstances permitted to, directly or indirectly, personally or through any third parties, offer, give, promise, ask for or accept bribes, including for the purpose of simplifying any administrative, official or any other procedures in any form. The Bank's employees should avoid any situations where their personal interest or bias would affect the objectivity of their professional judgment or contradict the interests of the Bank's customers or partners.

6.2. The Bank's employees may not solicit any third parties, including Suppliers' representatives, for any illegal remuneration.

6.3. The Bank does not work with any Suppliers that practice or tolerate any illegal acts of corruption in their activities. Suppliers may not offer or accept any illegal remuneration or use any other illegal methods or incentives in working with their business partners.

6.4. The Bank incorporates an anti-corruption clause in contracts, agreements or any other similar documents executed with Suppliers that stipulates mutual obligations of the parties on zero tolerance for corruption-related violations and sets forth consequences for non-compliance with those obligations.

7. Conflict of Interest

7.1. For the purposes of this Code, conflict of interest means a direct or indirect contradiction between property or any other interests of the Bank and/or of its employees and/or of one or more Suppliers, as a result of which an action (omission) by one party may entail adverse consequences for the other party.

7.2. A conflict of interest arises, among other cases, in a situation where (direct or indirect) personal interest of an employee of the Bank influences or can influence proper, fair and unbiased performance of his/her job duties (exercising of his/her powers) during procurement activities.

7.3. Personal interest of an employee that affects or may affect proper exercising of his or her official duties means a possibility for him or her to receive from any third parties in the course of performing his or her official duties any income in the form of cash, valuables, any other assets or services of a property nature, or any other property rights or benefits for himself/herself or for any third parties.

7.4. Any contradictions between the Bank's business units, as well as any contradictions arising during negotiations of commercial terms and conditions in the normal course of procurement activities the terms of which have been disclosed or should have been known to a negotiating party, are not deemed to constitute a conflict of interest.

7.5. The Bank, its Suppliers, and their employees should use every effort to prevent and avoid any conflicts of interest.

8. Ethical Standards

8.1. The Bank abides by the principles of doing fair and honest business, and of a responsible behavior towards market participants.

8.2. The Bank expects its Suppliers to conduct their business in accordance with the principles of ethics and good faith. The Bank's Suppliers must avoid any form of corruption, extortion or embezzlement. Suppliers may not offer gifts or any other remuneration to the Bank's employees, or take any other actions that may be regarded as hidden remuneration for cooperation with that particular Supplier that may adversely affect the reputation of the employee or the Bank.

8.3. Suppliers may not take any actions that restrict competition, or enter into a collusion or a price-fixing agreement. Suppliers should provide accurate and true information on compliance of Suppliers and their products with the Bank's requirements.

8.4. The Bank sets up the Compliance Hotline – a safe and confidential information channel operating 24/7 to accept reports from Suppliers (including anonymous ones) about any persons contacting them to make them take corruption actions or about any conflicts of interest identified among the Bank's employees in the course of procurement activities. Information on how to file a report at the Compliance Hotline can be found on the Bank's official website (<https://www.sberbank.ru>).

8.5. The Bank's Suppliers undertake to protect and use confidential information of the Bank that became known to them in the course of procurement activities only for its intended purpose while making sure that the rights of all employees and business partners have been protected and any intellectual property rights are valid.

9. Final Provisions

9.1. This Code is posted in the Procurement section of the Bank's official website.