

Anti-corruption policy

Moscow Exchange adheres to high anti-corruption and bribery standards. Bribery and corruption risk management is based on key principles defined in the Moscow Exchange Anti-Corruption Policy adopted in 2015. These principles include prohibition of any actions related to corruption and bribery, investigating situations with signs of, or suggesting corruption risk, an analysis of risk related to counterparty exposures and staff training.

The MOEX Anti-Corruption Policy outlines the following:

- ▶ the prohibition of giving/taking anything of value (including gifts) in attempt to facilitate decision-making;
- ▶ the prohibition of making deals with third persons acting on behalf of, or for Exchange;
- ▶ a collegial body must be in place to make decisions on entering into contracts;
- ▶ anti-corruption clauses must be inserted into contracts;
- ▶ counterparty due diligence;
- ▶ employees should be enabled to declare (also anonymously) the likelihood of corruption risk