

APPROVED
by order of MC Delo
dated February 16, 2022 No.8

**POLICY OF MC DELO
IN THE FIELD OF INTERACTION WITH PUBLIC AUTHORITIES
(revision No. 1)**

City of Moscow
2022

1. General provisions

Limited liability company "Management company "Delo" (hereinafter – "MC Delo") seeks to establish and maintain strong relations with public authorities and local self-government bodies (hereinafter referred to as authorities), both in the Russian Federation and in foreign states, where the Delo Group of Companies (hereinafter - the Delo Group) operates.

MC Delo builds its relations with the authorities on arms' length basis, on the principles of strict compliance with all regulations and rules of business conduct in the Russian Federation and abroad.

MC Delo confirms its commitment to close cooperation in all areas of its activities with the authorities of the Russian Federation and foreign states, where the Delo Group runs certain operations.

MC Delo is always open to dialogue with government officials in order to comply with the law and protect public interests to the greatest possible extent. MC Delo undertakes to refrain from any interaction with public officials that contravenes any legal regulations and ethical standards and causes damage to the business reputation of MC Delo.

2. Rules of interaction of MC Delo employees with government officials

In the course of performance of their official duties and assignments all employees of MC Delo shall interact with the authorities based on the following rules:

2.1. Any interaction with government officials within the framework of MC Delo activities assumes a formal style of communication subject to basic ethical standards of doing business.

2.2. Gifts and signs of hospitality in relations with government officials are allowed subject to compliance with the requirements of the existing legislation of the state, with whose officials interaction takes place.

2.3. Interaction with government officials takes place within the framework of various meetings, business meetings and on platforms designed to discuss issues affecting the economic activities of MC Delo and companies under its management, as well as legislative initiatives that may affect the activities of MC Delo and its affiliated companies.

This interaction is implemented in accordance with the requirements of existing legislation, ethical standards of conduct, as well as primarily with taking

minutes of meeting, which include the list of persons present, agenda and results of discussion of issues.

2.4. Interaction with government officials is also carried out during inspections of MC Delo for compliance with existing legislation.

Inspections for compliance with the existing legislation by public authorities can be in the form of desk audits (request of documents) and on-site audits (conducting inspection at the Company's premises).

2.4.1. As part of desk audits, designated persons of MC Delo prepare a substantiated response within the appropriate time limits and attach necessary documents and/ or information in accordance with the requirements of existing legislation and internal regulations in force in MC Delo.

Contacts and meetings with government officials within the framework of preparation of response are allowed in order to clarify certain issues necessary for preparation of proper response.

2.4.2. As part of on-site audits, designated persons of MC Delo with the involvement of representatives of legal service prepare documents, information, as well as a legal position on issues that arise during such audits.

In case of holding MC Delo or its executives liable for violating the law, as well as issuing appropriate instructions to eliminate violations of current legislation, participation of representatives of the legal service of the MC Delo is mandatory.

Legal service of MC Delo maintains control over execution of instructions to eliminate violations of current legislation.

Direct interaction with government officials involved in on-site audit is carried out by representative of MC Delo with the involvement of representative of the legal service or management of MC Delo.

2.5. Generation of reports based on the results of audit by public oversight authorities.

3. The procedure for responding by employees of MC Delo to potential situations of a corrupt nature.

The Company has implemented the following procedure for responding to potential situations of a corrupt nature within the framework of interaction with public authorities:

3.1. If any employee of the Company has some suspicions, such employee shall immediately report his suspicions to Vice-President of MC Delo for security by e-mail KNGritsay@delo-group.com and can also notify his immediate supervisor;

3.2. Employee of MC Delo shall inform the Vice President for Security about all cases of soliciting material benefits by public authorities in relation to MC Delo;

3.3. The Vice President for Security decides on appropriate response measures based on information provided by any employee in accordance with the Anti-Corruption Policy of MC Delo.
