

**Appendix 1
to Instruction of PJSC Rostelecom**

dated

**APPROVED
by a Resolution passed by
the Board of Directors
of PJSC Rostelecom**


**Minutes No 17
of 13 June 2023**

**CODE OF ETHICS
of PJSC ROSTELECOM
(Issue No 3)**

**Moscow
2023**

Table of Content

1	THE PURPOSE	3
2	GENERAL	3
2.1	THE SCOPE	3
2.2	STATUTORY REFERENCES	4
3	TERMS, DEFINITIONS AND ACRONIMS.....	4
4	KEY PROVISIONS OF THE CODE OF ETHICS	7
4.1	BASIC PRINCIPLES OF ETHICS	7
4.2	CONFLICT OF INTERESTS	8
4.3	MISUSE OF POSITION OPPORTUNITIES, GIVING AND ACCEPTING GIFTS, MAKING ENTERTAINMENT EXPENSES	8
4.4	CONFIDENTIAL AND INSIDER INFORMATION	9
4.5	COMBATTING CORRUPTION	9
4.6	PREVENTION OF MONEY LAUNDERING, FINANCING OF TERRORISM AND MASS DESTRUCTION WEAPON PROLIFERATION	11
4.7	BUSINESS BEHAVIOR ETHICS.....	11
4.8	PROCUREMENT ACTIVITIES, RELATIONSHIP WITH BUSINESS PARTNERS AND COMPETITORS	12
4.9	DONATIONS FOR POLITICAL ACTIVITIES, TO CHARITY AND SPONSORSHIPS.....	12
4.10	OCCUPATIONAL, FIRE AND INDUSTRIAL SAFETY AND PROTECTION OF ENVIRONMENT	13
4.11	PROTECTION AND USE OF THE COMPANY ASSETS	14
4.12	INFORMATION DISCLOSURES AND EXTERNAL COMMUNICATIONS	14
4.13	COMPLIANCE WITH THE CODE OF ETHICS AND VIOLATIONS REPORTING.....	15
5	FINAL PROVISIONS.....	16

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 3 of 16

1 The Purpose

The Code of Ethics of PJSC Rostelecom (hereinafter referred to as the “Code” or “Code of Ethics”) sets forth key standards of business conduct established by PJSC Rostelecom (hereinafter “Rostelecom” or the “Company”) for pursuing its activities, including standards of business ethics to be followed in their work by all Employees, members of the Board of Directors, the Management Board and Internal Audit Commission in their relations with their colleagues, Officials, Officers of any International Public Organization, Foreign Officials and other third parties, and also when representing the Company at various events of any nature (conferences, shows, exhibitions, social and cultural events, etc.) (hereinafter the “Business Ethics Standards”).

This Code of Ethics is stemmed from the four corporate values of PJSC Rostelecom: solutions by technologies, working for people, making complex things simpler, and creating the future.

The Company has also approved and enacted Internal Rules of Conduct regulating, among other things, the principal rights, duties and responsibilities of the Company and its Employees, and incentives and reprimands applicable to the Company’s Employees. For the purpose of implementation of the Code provisions the Company is guided by its internal documents (hereinafter the Internal Rules and Regulations or IRRs), requirements and rules of the current legislation of the Russian Federation, and applicable provisions of law of other countries.

Provisions of this Code have been prepared on the basis of the Russian Civil Code, the Russian Labor Codes, Federal Law No 208-FZ of 26.12.1995 ”On Joint Stock Companies”, Federal Law No 273-FZ of 25.12.2008 “On Prevention of Corruption”, Federal Law No 224-FZ of 27.07.2010 “On Preventing Abuse of Insider Information and Market Manipulation and making amendments to certain statutes of the Russian Federation”, recommendations of the OECD Principles of Corporate Governance, recommendations of the Corporate Governance Code developed by the Bank of Russia, Rostelecom Charter, and the Company’s IRRs.

This Code of Ethics is based, first of all, on the assumption that Employees will fully comply with all applicable laws, rules and provisions of the Company’s IRRs, as well as with requirements of the Company’s Compliance Framework.


This Code of Ethics shall take effect as of the date of its approval and supersede the Code of Ethics of PJSC Rostelecom (Issue 2), approved by a Resolution of the Board of Director (Minutes No5 of 05 October 2019).

2 General

2.1 The Scope

Requirements listed of this Code of Ethics shall be binding for all Employees of PJSC Rostelecom.

This documents shall be used “For guidance” in the Company’s Branches and “**for review and subsequent adaptation**” in SDCs.

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 4 of 16

2.2 Statutory references

In this Code of Ethics references are made to the following statutory documents:

- Federal Law No 273-FZ of 25.12.2008 “On Prevention of Corruption”;
- Federal Law No от 26.12.1995 № 208-FZ “On Joint-Stock Companies”;
- [Charter of PJSC Rostelecom](#);
- [Rostelecom Anti-Corruption Policy](#);
- [Procedure of drafting documents to be submitted for review by Rostelecom Management Board and Board of Directors](#);
- [Rostelecom file management guidelines](#);
- [Rostelecom glossary of terms and definitions](#);
- [Rostelecom regulations on conflict of interest management](#).

3 Terms, Definitions and Acronyms


For the purposes of this Code of Ethics, terms and abbreviations as defined in Rostelecom glossary of terms and definitions, as well the following terms are used in it:

Anticorruption Law shall mean Federal Law No273-FZ “On Prevention of Corruption” of 25.12.2008, the Russian Criminal Code, the Russian Civil Code, the Russian Code on Administrative Offences, as well as other federal laws and related regulations of the Russian Federation containing provisions aimed at prevention of corruption, as amended and/or supplemented from time to time;

Public Official shall mean a person, who permanently, temporarily or under a special authority exercises the functions of a government representative or performs organizational, administrative, economic functions in state bodies, local governments, state and municipal institutions, state non-budget financed funds, state corporations, state-owned companies, public legal companies, at state and municipal unitary enterprises, in businesses, in the supreme governing body of which the Russian Federation, a constituent entity of the Russian Federation or a municipal entity has the right to directly or indirectly (through persons controlled by them) dispose of more than fifty percent of the votes, or in which the Russian Federation, a constituent entity of the Russian Federation or a municipal entity has the right to appoint (elect) a sole-person executive body and (or) more than fifty percent of the members of the collective management body in joint-stock companies in respect of which the special right of the Russian Federation, constituent entities of the Russian Federation or municipal entities to participate in management of such joint-stock companies (“golden share”) is used, as well as in the Armed Forces of the Russian Federation, other military units and troop formations of the Russian Federation;

Business Partner shall mean a party with which the Company has made or intends to make a contract or other deal, with the exception of Customers;

Officer of an International Public Organization shall mean employees of an organization who are international civil servants, persons authorized to act on behalf of a public international organization, members of parliamentary assemblies of international

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 5 of 16

organizations to which the Russian Federation is a party, persons holding judicial positions in any international court whose jurisdiction is recognized by the Russian Federation;

Foreign Official shall mean a foreign individual, whether appointed or elected, holding a position of authority in any legislative, executive, administrative or judicial body of a foreign state; anyone executing a public function for a foreign state, including public authorities or enterprise (elected deputy, minister, mayor);

Insider Information shall mean accurate and specific information that was not disseminated or disclosed (including without limitation any information which is a business or trade secret or any secret protected by the law), the disclosure or provision of which may materially affect the value of the Company's securities, and which is included in the relevant list of the Company's insider information items;

Intellectual Property shall mean works of science, literature and pieces of art; computer programs; databases; performances; sound recordings; transmission of radio or TV programs by air or cable (over-the-air or cable broadcasting); inventions; utility models; industrial samples; achievements made by selection; IC layout designs; trade secrets (know-how); trade names; trade and service marks; appellations of origin; commercial designations;

Customer shall mean a natural person or entity, including carriers, which made a service contract with the Company, or which use the Company services without making any formal contract or agreement, or intending to make a contract;


Compliance shall mean ensuring conformance of the Company's activities with applicable requirements imposed on it by applicable Russian or foreign law, other binding and obligatory for its fulfillment regulations and the Company's internal rules and regulations, and implementation in the Companies of mechanisms to analyze, identify and assess operational risks and to ensure comprehensive protection of the Company;

Compliance Risks shall mean exposure to risks of legal penalties or penalties imposed by regulatory authorities, risk of suffering material financial losses or damage to the Company's business standing resulting from the Company's failure to conform with requirements, provisions, stipulations and/or standards of applicable Russian and foreign laws and internal policies and regulations relating to the scope of the Company activities and operations;

Confidential Information shall mean any information that has an actual or potential commercial value owing to the fact that it is unknown to third parties, legally inaccessible to public, and owing to measures undertaken by the holder of such information to protect its confidentiality;

Conflict of Interest shall mean a situation where personal interests (whether direct or indirect) of a person holding a position that presumes a duty to undertake measures to prevent or resolve a Conflict of Interest, affect or may affect proper, unbiased and objective performance by such person of his/her job functions (or exercise of powers);

Corruption shall mean an abuse of position of power, giving a bribe, receiving a bribe, abuse of authorities, graft or any other inappropriate or illegal use of one's own position of power,

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 6 of 16

contrary to legal interests of public and state, in order to obtain benefits in terms of money, things of value, other property or services of tangible value or other property rights for oneself or third parties, or illegal provision of such benefits to such person by other individuals, as well as undertaking of actions listed above, on behalf and for the benefit of a legal entity;

Personal Interest shall mean an opportunity for an Employee to receive monetary income or other property including property right, service of tangible value, proceeds from executed works or other benefits (preferences) for such person and/or his/her Associated Persons;

The Company shall mean PJSC Rostelecom;

Money Laundering shall mean giving a veneer of legality to ownership, use or disposal of monetary funds or any other property received through committing a crime;

Prevention of Corruption shall mean activities pursued by federal governmental authorities, governmental authorities of constituent entities of the Russian Federations, local municipal authorities, civil society institutions, by organizations and individuals within their respective authority:

a) to prevent corruption, including measures to identify and cure afterwards causes of corruption (preventive anticorruption measures);

b) to reveal, prevent, eliminate, discover and investigate corruption offences (measures of fighting corruption);

c) to mitigate and/or cure consequences of corruption offences.

Associated Persons shall mean immediate or close relatives, including broad family of an Employee (his/her parents, spouses, children, brothers and sisters, as well as brothers, sisters, parents, children of spouses and children's spouses), individuals or organizations which are associated through property, corporate or other close relationship with the Employee and/or his/her close relatives or connections.

Employees shall be used in reference to all individuals hired by PJSC Rostelecom under relevant employment contracts/agreements, both full-time and part-time, as well as to persons performing works for (providing services to) the Company on the basis of civil law contracts, for the entire duration of the effective term of the relevant contract;

Sponsorship shall mean provision or ensuring provision of funds to an organization for arrangement and/or implementation of a sports, cultural or any other event, creation of and/or broadcasting of TV or radio programs or creation and/or using of any other result of creative activities;

SDCs shall mean Rostelecom's subsidiaries and dependent companies;

OECD Organization for Economic Co-operation and Development.



4 Key Provisions of the Code of Ethics

4.1 *Basic principles of ethics*

The Company image relies on the behavior of each Employee.

Violation of laws or improper behavior of any Employee may incur damage to the image and financial position of the Company.


All Employees shall take due care for creation, maintaining and promotion of the good business standing of the Company regardless of their positions, responsibilities and region of activities.

Employees shall undertake to act honestly and abide in their operation by the following principles underlying the Company's Code of Ethics:

- **Lawfulness**, meaning full compliance with provisions of applicable laws and requirements of IRRs as approved and adopted in the Company;
- **Due Care**, meaning compliance with high standards of business ethics and facilitation of resolution of any open and hidden Conflict of Interest arising out of mutual impact of personal and professional activities. Ensuring protection and safeguarding, and sound, proper and fair use of the Company assets;
- **Transparency**, meaning prompt and full disclosure within one's responsibilities of information to be submitted to Russian and foreign governmental and regulatory authorities, stock exchanges, shareholders, investors and other stakeholders;
- **Confidentiality**, meaning compliance with requirements of applicable law and the Company's IRRs with respect to safeguarding and use of the Confidential Information obtained in the course of performance of one's official duties;
- **Involvement**, meaning timely reporting to the Company of any instances of violation of this Code and contributing to promotion of the good business standing of the Company.

In the event of the Company's doing business in other countries where applicable laws, rules, regulations, customs and social requirements may differ from those adopted in Russia, the Company should adhere to the policy of compliance with national and local laws. The fact that while certain standards of legal conduct are prohibited by law, such prohibitions are not enforced in practice, or their violation is not subject to public criticism or censure, will not excuse any unlawful act committed by an Employee. In the event of any situation where an Employee is in doubt about the proper course of conduct, such Employee must immediately contact his/her immediate supervisor or Asset Protection Department for advice.

Any Employee who became aware of any violation of the Code of Ethics requirements, provisions of laws or IRRs should report such violation as prescribed in par. 3.13 of the Code of Ethics. The Company ensures for an Employee an opportunity to report violations anonymously.

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 8 of 16

4.2 Conflict of Interests

Employees shall undertake to use their best efforts to avoid situations that result or may potentially lead to any Conflict of Interest. Such situations may arise in relations with Business Partners and Customers of the Company, and with Public Officials, Foreign Officials, Officers of International Public Organization.

No Employee shall be allowed to have a personal interest in any activity of the Company's Business Partner. This rule shall be applicable to any type of expected benefit from the Company's Business Partners, including participation in the capital and Personal Interest in making deals involving the Company.

No Employee shall be entitled to engage in any activity that to a great extent diverts him/her from or interferes with diligent performance by such Employee of his/her duties in accordance with requirements set forth in IRRs.

Any actual and potential Conflict of Interests must be promptly reported by Employees using one of the means provided by the Company, listed in par. 3.13 of the Code of Ethics.


Holding by a member of the company Management Board of any position in governing bodies of other organizations shall be permitted only subject to a consent of the Board of Directors of PJSC Rostelecom.

Employees shall be entitled to engage in any political, educational, charity and social activities provided that such activity does not interfere with impartial and proper performance by them of their direct job duties and is not contrary to or damaging the Company interests.

4.3 Misuse of position opportunities, giving and accepting gifts, making entertainment expenses

Employees are prohibited from using their job positions in the Company to gain personal benefits, including:

- accepting any gifts, remunerations, privileges, or other benefits for oneself or other persons in exchange for any services provided by the Company, or for any action or omission, or disclosure of any Confidential or Insider Information;
- accepting any gifts, remunerations, privileges, or other benefits for oneself or other persons in the course of the Company's dealings, both prior to or after negotiating a transaction or agreement;
- accepting any gifts, remunerations, privileges, or other benefits for oneself or other persons on the grounds not stated in the Company's IRRs or in employment contracts, in the course of performance of one's official duties;
- receiving any services, including loans and borrowings, from persons directly or indirectly associated with the Company, except for lending institutions or service providers offering loans or similar services to third parties under similar terms and conditions in the course of their routine business activities.

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 9 of 16

Offered or accepted gifts or entertainment shall not be intended to influence impartiality and fairness of a decision to be made by Employees in the course of performing their job duties. A gift or entertainment shall not be perceived as an inducement for the accepting person to take or not to take any action.

Acceptance or offer of gifts either in cash or as monetary funds is unacceptable.

No gifts, hospitality or entertainment can be accepted or offered if accepting or offering such a gift will put the accepting person under any obligation.

If any entertainment expenses are made, Employees must act in good faith, reasonably and in strict compliance with applicable Russian law and the Company's relevant IRRs. Misuse of the Company's funds will entail liability in accordance with applicable Russian law and the Company's IRRs.

Employees must either anonymously or openly report any cases of offering or accepting gifts, where appropriateness of such gifts is doubtful, using one of the means available in the Company as described in par. 3.13 of the Code of Ethics.

4.4 Confidential and Insider Information

Employees who have access to the Confidential or Insider Information (whether made available to them by the Company or by other sources) shall only use it in connection with performance of their official duties. Employees shall not permit Confidential or Insider Information to be disclosed to third parties, including their Associated Persons or other Employees of the Company, other than in cases where such disclosure is authorized by Russian law or the Company's IRRs.

The obligation to protect the Confidential and Insider Information continues in effect after the end of employment or termination of the term in office.

In making transactions with the Company's shares and securities, Employees must comply with terms of Regulations governing access to the Insider information, rules for protection of its confidentiality and supervision over compliance with requirements of the Russian law pertaining to insider information.

The procedure of making transactions (including recommendations on transactions made to third parties) with Rostelecom securities by Employees who have access to the Confidential or Insider Information shall be governed by Regulations on access to Insider information, rules for protection of its confidentiality and supervision of compliance with requirements of the Russian law pertaining to Insider Information of PJSC Rostelecom.

4.5 Combatting Corruption


The Company develops and implements measures aimed at prevention of corruption, including without limitation the following:

- designation of organizational of units or officers responsible for prevention of corruption or other offences;



- elaboration and practical application of standards and procedures aimed at ensuring diligent performance;
- adoption of the Company's Code of Ethics and making Employees aware of the Code provisions;
- prevention and resolution of the Conflicts of Interest;
- ban of any unofficial, inaccurate accounting and use of forged documents;
- implementation of common consistent policies of the Company to combat corruption, fostering "zero-tolerance" of corruption by Employees;
- liaison of the Company on corruption prevention matters with public authorities, law enforcement agencies, governmental and commercial organizations, institutions of civil society;
- adoption of administrative measures, incentives and other steps aimed at engaging Employees in more pro-active involvement in combatting corruption and at fostering within the Company strongly negative perception of any corrupt conduct;
- improvement of the Company internal control framework in terms of compliance with Anticorruption laws;
- ensuring transparency, fair competition and impartiality of financial and business operations of the Company and in relations with Business Partners;
- improving the procedure of appropriation of the Company property and resources and assignment of rights to use such property and its disposal;
- training and advising Employees on issues related to prevention of corruption and compliance with provisions of law;
- implementation in the staff management framework in the Company of the practice requiring from Employees and candidates for holding senior positions within the Company to meet relevant criteria;
- implementation in the Company's staff management framework of rules requiring that continued, impeccable and efficient performance by an Employee of his/her duties and responsibilities according to requirements of this Code of Ethics should be taken into account when considering his/her promotion to a senior management position in the Company;
- streamlining functionality of www.nocorruption.rt.ru anticorruption website aimed at improving legal knowledge and awareness of Employees, Business Partners and other persons.

It is strictly prohibited for Employees directly or indirectly, personally or via third parties to be involved in corrupt practices, offer, give, promise, ask for or receive bribes (illegal remuneration) or make payments to facilitate completion of administrative, bureaucratic and other formalities in any form, including, in the form of cash funds, valuables, services or other benefits, to any persons and from any persons or organizations, including commercial organizations, government and self-

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 11 of 16

government authorities, Public Officials, Foreign Officials, Officers of International Public Organizations, private companies and representatives thereof, as well as to condone corruption.

4.6 Prevention of money laundering, financing of terrorism and mass destruction weapon proliferation

Any fraud is unacceptable in the Company. The Company shall undertake measures to prevent and detect any fraud activities. Compliance with the Company’s Code of Ethics is one of the ways of fraud prevention.

PJSC Rostelecom reserves the right to report to law enforcement agencies any cases of fraud of which the Company becomes aware.

The Company abides by all requirements of the Russian law related to prevention of money laundering, financing of terrorism and mass destruction weapon proliferation and shall undertake adequate measures available under the circumstances regarding management of related risks.

4.7 Business behavior ethics

Employees shall treat with respect their colleagues, adhere to Business Ethics Standards, maintain friendly environment. Employees are prohibited from using obscene words, or expressly disrespectful manner of speaking in communications with colleagues, Business Partners, Customers and other persons.


No psychological pressure or coercion in respect of Employees is tolerated by the Company. Moreover, the Company shall not accept creation of unfavorable moral among Employees and managing them by using threats, insults, or other means aimed at intimidating or denigrating Employees.

No labor rights and freedoms shall be restricted in the Company, nor any advantages or privileges can be obtained on the basis of an Employee’s sex, race, skin color, ethnicity, spoken language, origin, property, marital and social status, job position, age, domicile, religious affiliation, convictions, affiliation or non-affiliation with public associations or social groups, or based on other conditions not related with an Employee’s business qualities.

The Company shall encourage creation of “zero-tolerance” environment regarding any discrimination, including that of an Employee’s sex in the form of sexual harassment.

Any Employee shall be responsible for maintaining favorable staff morale, including preclusion of any occurrences of discrimination, harassment, personal conflicts and quarrels. Any Employee upon becoming aware of any such occurrence shall report it either anonymously or identifying him/herself, using any of the means made available in the Company, as specified in par. 3.13 of this Code of Ethics.

Employees shall treat with respect their colleagues, and all the Company Customers’ and Business Partners’ representatives regardless of their age, labor abilities, sex, nationality, ethnic origin, race, religious and sexual affiliation and other aspects not affecting the Company’s business interests.

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 12 of 16

In their relations with their fellow-employees, Customers and Business Partners, Employees shall refrain from any kind of manipulation, concealing or misrepresentation of information, abuse of official position or other improper ways of conducting business affairs.

4.8 Procurement activities, relationship with Business Partners and competitors

The Company expects that its Business Partners share the Company’s ethical principles and that their activities comply with law applicable to the Company. The Company seeks to be involved with only those Business Partners that are guided by principles of legality, do not accept corruption, respect human rights and care for labor safety and health of their employees.

In its arrangements and management of procurement procedures the Company is guided by the following principles:

- procurement transparency;
- equal, fair, non-discriminative conditions for all procurement participants and no unreasonable restrictions of competition among them;
- appropriate and cost effective spending of funds allocated for purchases of goods, works and services and taking steps aimed at saving customer costs;
- participation in procurement shall not be restricted by applying unreasonably high requirements to be met by procurement participants in order to be admitted for bidding.

All Employees shall exercise maximum transparency and fairness in the course of procurement arrangements and execution.

All Employees shall pay particular attention to compliance with Federal Law No223-FZ of 18.07.2011 “On Procurement of Goods, Works and Services by Certain Legal Business Entities”, Federal Law No44-FZ of 05.04.2013 “On the Contract System in the Sphere of Procurement of Goods, Works, Services for State and Municipal Needs” and other legal and regulatory acts and the Company’s IRRs regulating public procurement practices.


The Company adheres to the principle of fair and open competition. All Employees shall follow the rules of fair competition and comply with the applicable antimonopoly law of the Russian Federation.

Any illegal receipt of competitive information by Employees as well as deliberate dissemination of apparently false information about competitors and their activities are prohibited.

4.9 Donations for political activities, to charity and sponsorships

The Company does not make any donations to political activities.

The Company realizes its responsibility to society and supports charity and public initiatives. The Company approves of participation of its Employees as private persons in private and public initiatives provided that such activities are not in conflict with the Company’s interests, do not violate provisions of applicable Russian law and this Code and do not result in any Conflict of Interests.

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 13 of 16

The employees are prohibited from making their own donations on behalf of the Company.

All donations shall be open and transparent, and the purpose of using a donation shall be clear. Any donation shall comply with provisions and requirements of applicable Russian law and be properly recorded.

Sponsorship activities donations shall be pursued solely for lawful purposes and based on a written agreement. All payments made within the sponsorship framework shall be properly documented and transparent, and their amounts shall be sized as appropriate to the sponsored event.

It is not allowed to make donations and pursue sponsorship activities to gain improper competitive advantages.

4.10 Occupational, fire and industrial safety and protection of environment

Employees' lives and safety, occupational, fire and industrial safety and environment protection are among the Company's top priorities. In its activities the Company shall ensure compliance with all requirements of applicable current laws regarding to safe arrangements of work execution. The Company seeks to mitigate any adverse impact to people, natural resources and environment.

The Company shall contribute organizationally to protection and sustainable development of environment and support efforts undertaken to this end by Russian and international communities. The Company shall do its utmost to ensure safety, and prevent any incidents and emergencies from happening.


As the Company participates in various projects, it shall not ignore or evade compliance with applicable environmental protection laws.

The Company shall comply with all legal requirements with regard to labor safety. The Company shall elaborate and implement a set of measures aimed at protection of labor including guarantee of labor safety, training of employees and supervisory measures.

The Company shall develop and put in place a set of occupational safety measures to ensure work safety, including such measures as Employees' training, as well as preventive, correcting and supervising measures.

The Company obligates every Employee:

- continuously to follow work safety rules and regulations, maintain safe work conditions on their working places;
- promptly to report any accidents and injuries happened on working places, unsafe working methods and unsecure conditions of activities and any such use of equipment, other working tools and means of transportation;
- to pursue responsible and conscientious approach to adhering to environment security and make every effort possible to mitigate adverse impacts to the nature and environment.

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 14 of 16

4.11 Protection and use of the Company assets

Employees are bound to ensure protection, safekeeping and appropriate and fair use of Company's assets, both tangible and intangible. Assets include without limitation buildings and facilities, equipment, cash funds, office appliances, designs, technologies, business plans and strategies, financial data and other information related to the Company's business, and Employees' working hours.

Employees shall use their best efforts to prevent any negligent, illegal or ineffective use or misuse of the Company's assets. The use of the Company's assets for personal gains is unacceptable.

The Company's intellectual property is one of its key assets. Disclosure of information designated for internal use, to any third party can damage the Company's assets.


Employees shall respect legal rights and interests of third parties and shall not allow any illegal use of third parties' intellectual property in their work.

4.12 Information disclosures and external communications

Employees shall do their utmost to ensure full and timely disclosure of information to Russian and foreign governmental and regulatory authorities, shareholders, investors and other stakeholders. Such disclosure must comply with all applicable legal requirements and shall be free of any material misstatements or omissions. This policy applies to all public disclosures of material information about the Company.

Particular attention shall be accorded to disclosure of information on the Company's financial position, and the following principles shall be adhered to in order to prepare such information:

- maintaining the Company's financial and accounting books and records and preparing the Company's reports and statements in conformance with provisions of applicable law;
- compliance with the requirements of applicable accounting and reporting standards, and standards of the Company's internal control system when preparing the Company's accounting reports and financial statements;
- making accurate, correct and complete records, as required, in the Company's financial and accounting documentation reflecting events and completed financial transactions, as well as entering all necessary additional information;
- no apparently false, forged or deliberately falsified information in the Company's financial and accounting documentation;
- correct recording of all operations in the course of the Company's financial and business activities by way of making relevant entries in the designated accounts specifying necessary details and for relevant accounting periods; and
- efficient liaisons with the Company's Audit Commission, the Audit Committee of the Board of Directors and independent auditor.

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 15 of 16

Information disclosures shall be made by authorized Employees only, within the timelines and in the manner stipulated by law and the Company’s IRRs.

The Company is committed to the principle of transparency in its activities and payments made according to the relevant payment designation and conducted business operations.

All employees shall comply with rules established in the Company for liaisons with mass media.

Without required authorities, it is not allowed to discuss with representatives of mass media any matters related to the Company’s activities or make any public statements about the Company’s activities. Such actions are only allowed if they are stipulated by the job functions/roles or approved in compliance with the Company’s IRRs.

Rules of liaisons between the Company’s Employees and mass media are governed by Regulations of Rostelecom on interaction with mass and social media.

4.13 Compliance with the Code of Ethics and violations reporting


Every Employee is obliged to comply with this Code of Ethics and shall report any instances of actual or potential breach of the requirements of this Code or applicable laws. Relevant measures to mitigate (eliminate) Compliance Risks in the Company will be undertaken given the timeliness of reporting such information about violations.

A majority of violations of ethical and legal provisions are normally found by Employees, therefore an open and candid working environment conducive to productive criticism by Employees is appreciated in the Company. The Company encourages such initiatives because they help manage Compliance Risks and identify and eliminate them as they arise, while maintaining favorable environment.

An Employee who becomes aware of any violations of the Code requirements, provisions of law, the Company’s IRRs committed by any other Employee, Business Partner, Public Official, Foreign Official, Officer of an International Public Organization or any other person, or of any prepared or expected violation must promptly report this either anonymously or identifying him/herself, using one of the following methods:

- making a report in person to a representative of the Company’s Asset Protection Department;
- making a report to the Audit Committee of the Company’s Board of Directors;
- by phone at 8-800-1-811-811 Line of Trust of Rostelecom, which is available for reporting by both Employees and third parties;
- filling out a feedback form for receiving reports of violations posted on Rostelecom anticorruption portal at www.nocorruption.rt.ru;
- sending an e-mail to the Compliance with the Code of Ethics Hotline at ethics@rt.ru.

Employees and other persons (hereinafter the “Whistleblowers”) are able to report their suspicions with regard to breaches of the Code of Ethics anonymously without providing their

 Rostelecom	Code of Ethics of PJSC Rostelecom	
Issue: 3/2023	P14 Security Assurance	Page 16 of 16

personal data. Nevertheless, if any Whistleblower identifies his/her name, the Company will be able to cooperate with him/her in conducting investigation and provide feedback based on the results of the investigation, thus improving efficiency in eliminating the reported breach.

The Company warrants that Whistleblower's personal data as well as the information provided will be used confidentially and solely for the purpose of conducting an internal investigation and only by the persons who are directly involved in the required actions.

The Company undertakes not to allow any retaliation actions to be taken against any Whistleblower who acts in good faith in reporting any such breach. Any persecution or putting pressure on Employees who have reported violations of the Code or take part in investigating such violations are prohibited.

Any attempts to interfere with anybody's reporting any violations of the Code of Ethics, IRRs and/or provisions of Russian laws are prohibited.

All reports of breaches (actually perpetrated or potential) shall be promptly investigated and relevant measure to cure the violation shall be taken. If required by law, relevant materials shall be submitted to competent governmental authorities.

Employees should not avoid working together with the Company in the course of investigations. Malicious provision of false or misleading information is unacceptable.

Employees that breach applicable Russian laws, rules, provisions of this Code may be subject to appropriate, case specific disciplinary actions, administrative, civil law and/or criminal liability.

On any matters related to compliance with this Code any Employee can contact his/her direct superior or a representative of Asset Protection Department of the Company.

5 Final provisions

This Code of Ethics is subject to approval by the Company Board of Directors.

Given the interests of the Company, its shareholders, investors and other stakeholders, the Company Board of Directors is entitled at any time to make amendments to this Code.