


Appendix 1
to Instruction of PJSC “Rostelecom”
No _____ of _____

APPROVED
by Resolution of the Management Board
of PJSC “Rostelecom”

Minutes No24
of 06 June 2023

Rostelecom Anti-Corruption Policy
(Version 4)

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STATEMENT BY ROSTELECOM PRESIDENT MIKHAIL OSEEVSKIY

Dear Colleagues,

Adherence to high standards of sustainable development and corporate governance is at the core of Rostelecom's strategy and development culture and is essential for creating company's long-term value.

It is one of the key tasks on this route to implement effective corruption prevention practices ensuring unwavering compliance with requirements of law and steadfast commitment to ethical business principles based on honesty, openness and integrity.

We can often hear the word "corruption", but we do not always clearly understand what is behind this term. The document you are reading now is aimed to cross all the "t"s and dot all the "i"s on this issue, and establish standards of staff conduct to successfully prevent corruption in our company.

As early as in the XIth century a famous Chinese reformer Wang Anshi in his writings on corruption pointed out two principle sources of corruption: "ineffective laws and bad people". Rostelecom Anti-Corruption Policy should help us establish clear "rules of the game" that will leave no room for "bad people" in our company, so that we could work diligently and faithfully to create and offer usable digital services to millions of Russian households, hundreds of thousands of corporate and governmental customers.

For quite a number of years Rostelecom has been consistently pursuing activities aimed at combatting corruption and raising standards of business ethics that are in turn translated to subsidiaries and affiliates. The Company has set up a hotline for reporting any violations that can be used anonymously by every employee. Adoption of an updated anti-corruption policy is a logical continuation of this work and an important step forward in its improvement.

Fighting corruption in Rostelecom should not be formal, so that both senior executives and ordinary employees should bear responsibility for their actions.


Corruption is our worst enemy. Any inappropriate actions could result in material losses, undermine the credibility of our company, damage Rostelecom image and cause impairment of relationships with partners, customers and other stakeholders. Nevertheless, it is totally within our power not to let this happen. Therefore, it is essential that everyone should not only read the Anti-Corruption Policy, but also adhere strictly to all the provisions and rules stated in it!

It is important to realize that fighting any manifestations of corruption in Rostelecom will not be formal. Everyone will bear responsibility for his/her actions - from senior executives down to rank-and-file employee.

Mikhail Oseevskiy
President

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1 The Purpose

Corruption Prevention Management Framework (hereinafter the CPMF) has been developed by the Company, properly documented, implemented, put in place in the Company, and maintained, regularly reviewed and improved wherever required.

Rostelecom Anti-Corruption Policy (hereinafter the “Policy”) is the cornerstone of the Corruption Prevention Management Framework and shall set forth basic principles and requirements regarding compliance with provisions of the Anti-Corruption Law by Rostelecom Employees, the Internal Audit Commission, Business Partners and by other persons.

The Policy shall serve as the basis for setting, revising and achieving Corruption Prevention targets. The primary goals of the Policy are as follows:

- mitigating (eliminating) Corruption Risks, fraught with involvement of the Company and/or its Employees regardless of their positions in any corruption activity;
- seeking common consistent understanding by Business Partners, Employees and other persons of the Policy rejecting any form and manifestation of corruption;
- generalization and clarification of key requirements of the Anti-Corruption Law as applicable to the Company and its Employees;
- stipulation of the Employees’ duty to understand and comply with principles and requirements of this Policy, the CPMF provisions and requirements, key provisions of the Anti-Corruption Law, and reasonable measures of Corruption Prevention.

The Policy was developed pursuant to the current Russian Law, the Company Charter and other internal policies and regulations (hereinafter the “Internal Policies and Regulations”) given generally recognized principles and stipulations of the international law, international treaties, and anti-corruption statutes.

All the Company’s Employees shall be obliged to strictly comply with principles and requirements of the Company’s CPMF as a whole and this Policy in particular.


Principles of the CPMF as a whole and this Policy in particular shall be applicable to the Company’s Business Partners and Employees, as well as to other persons wherever such duties are prescribed in contracts with such persons, in their internal regulations, or directly stipulated in current law and statutes.

This Policy shall take effect as of its approval as appropriate, replacing Rostelecom Anti-Corruption Policy (Version 3), as approved by Resolution of Rostelecom Management Board (Minutes No12 of 3 December 2019.).

2 General

2.1 Scope

Requirements of this Policy shall be applicable to all Employees of Rostelecom.

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Application of this Policy in the company Branches: for guidance, and it should be used for review and adaptation in the company subsidiaries and dependent companies.

2.2 *References*

The following legal documents are referenced in this Policy:

- Federal Law No273-FZ of 25.12.2008 “On Combatting Corruption”;
- General Guidelines for development and adoption by the Operators of measures of preventing and combatting corruption (issued by the Russian Ministry of Labor and Social Care on 08.11.2013);
- Charter of Rostelecom;
- Code of Ethics of Rostelecom;
- 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.


2.3 *Terms, definitions and abbreviations*

For the purposes of this Policy, terms and acronyms defined in Rostelecom glossary of terms and definitions, as well as the following terms are used:

The Anti-Corruption Law shall mean the following: Federal Law No273-FZ of 25.12.2008 “On Combatting Corruption”, Russian Criminal Code, Russian Civil Code, Russian Administrative Offences Code, as well as other Russian Federal Laws and statutes, and subordinate legislation and regulations that contains provisions and stipulations aimed at combatting corruption, as amended and/or supplemented from time to time;

Charity Activities shall mean voluntary activities of individuals and entities consisting in transfer to individuals or entities of property, execution of work for such other individuals or entities, supply of services, provision of other support to them on complimentary (free of charge) or on preferential terms and conditions basis. Remittance of monetary funds or provision of other tangible items or other forms of aid to for-profit organizations, or supporting political parties, movements, groups and campaigns shall not be deemed charity activities;

Public Official shall mean an individual who, on a permanent, temporary or on a special authority basis, exercises the functions of a representative of public authorities or performs organizational and managerial, administrative and economic functions in state bodies, local government bodies, state and municipal institutions, state out-of-budget funds, state corporations, state-owned companies, public-law companies, in state and municipal unitary enterprises, in business entities where the Russian Federation, a constituent entity of the Russian Federation or municipality has the right to control directly or indirectly (through persons controlled by them) more than fifty percent of the votes in their supreme governing bodies, or in which the Russian Federation, a constituent entity of the Russian Federation or a municipality has the right to appoint (elect) their sole person executive body and/or more than fifty percent of members of their collective governing body, in joint-stock companies

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in respect of which the special right of participation (the "golden share") of the Russian Federation, constituent entities of the Russian Federation or municipalities is used in the management of such joint-stock companies, as well as in the Armed Forces of the Russian Federation, other troops and military formations of the Russian Federation;

Providing a Bribe shall mean an act of giving a bribe to a Public Official, a Foreign Public Official or an Official of a Public International Organization, done in person or through an intermediary (including the case where a bribe is transferred to another individual or legal entity as directed by the official); **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;

Official of a Public International Organization shall mean an employee of an organization who is an international civil servant, a person authorized to act on behalf of a public international organization, a member of parliamentary assemblies of international organizations where the Russian Federation is a participant, or a person holding judicial office in any international court whose jurisdiction is recognized by the Russian Federation;

Foreign Public Official shall mean any 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 for a public authority or enterprise (for instance, elected deputy, minister, mayor);

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;

Commercial Bribery shall mean any illegal transfer of money, securities, or any other property or illegal provision of services of pecuniary nature or grant of other property rights to a person who discharges the managerial functions in a for-profit or any other organization (including situation where at the direction of such person, property is transferred, or services of pecuniary nature are rendered, or property rights are granted to another individual or legal entity) for the performance of actions (omissions) in the interests of the giver or other persons, if the said actions (omissions) are within the official powers of such a person or if, by virtue of his/her official position, he/she is able to facilitate performance of the said actions (omissions);


Company-controlled organization shall mean a company:

- which is either controlled by the Company through direct or indirect ownership of more than 50% voting shares or the Company otherwise is able to determine decisions made by such company;

Or

- where the Company directly or through its subsidiary can materially influence operations of such company;

Conflict of Interest shall mean a situation where personal interests (whether direct or indirect) of an Employee and/or his/her Associated Person, affect or may affect proper,

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unbiased and objective performance by such person of his/her job duties or official functions (or exercising his/her powers);

Corruption 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 anti-corruption laws and internal policies and regulations covering the Company activities and operations;

Corruption shall mean any abuse of position of power, Providing a Bribe, Receiving a Bribe, abuse of authorities, Bribery of officers in for-profit organizations, or any other inappropriate or illegal use of one's own position of power, 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 pecuniary nature, 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 rights, services of pecuniary nature, proceeds from executed works or other benefits (preferences) for such person and/or his/her Associated Persons;

Illegal Remuneration shall mean any illegal payment, or offer or promise on behalf or in the interests of the Company, of money, securities, other property, or illegal provision of services of pecuniary nature, grant of property rights to a Public Official, Foreign Public Official or Official of a Public International Organization for the acts or omissions by such public officials committed by such officials in the interest of the Company, where such acts or omissions are related with *ex officio* powers of such public official;


The Company shall mean PJSC Rostelecom;

Charitable Donation shall mean a thing or right granted as a gift for the public good;

Receiving a Bribe shall mean receipt by a Public Official, Foreign Public Official or Official of a Public International Organization, personally or through an intermediary, of money, securities, other property, or in the form of illegal provision to such person of property services, grant of other property rights for the performance of actions (omission) in favor of the bribe-giver or persons represented by him, if such actions (omission) are within the official powers of the official or if he/she, by virtue of such official position, can facilitate such actions (omission), as well as for general patronage or connivance in office;

Combatting Corruption shall mean activities of the Russian federal governmental authorities, those of Russian constituent entities, local municipal authorities, civil society institutions, organizations and physical persons within their respective powers:

- a) to prevent corruption, including identification and subsequent elimination of corruption causes (corruption prevention);

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- b) to identify, prevent, put an end to, discover and investigate corruption offences (fighting corruption);
- c) to mitigate and/or eliminate consequences of corruption offences;

The Top Management shall mean President, First Vice Presidents, Senior Vice Presidents, Vice Presidents, Chief Accountant, and executives acting for such persons;

Associated Persons shall mean immediate or close relatives, including extended 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;

Office of Assurance of Compliance with Anti-Corruption Provisions shall mean Asset Protection Department (hereinafter APD) which has requisite powers and is responsible for CPMF control;

CPMF shall mean a consistent system of corruption counteraction measures and controls as regulated by requirements of ISO 37001:2016 international standard;

Employee shall be used in reference to all individuals hired by PJSC Rostelecom under relevant employment contracts/agreements, both full- and part-time, as well as to persons performing works for (providing services to) the Company on the basis of civil law contracts, throughout 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 sports, cultural or any other events, creation of and/or broadcasting of TV or radio programs or creating and/or using any other result of creative activities.

3 Anti-Corruption Law

The Company and Employees shall adhere to compliance with provisions of the Anti-Corruption Law, generally recognized principles and stipulations of the international law, and international treaties of the Russian Federation, as well as with principles and requirements of this Policy in any country worldwide.

Key provisions of the Anti-Corruption Law can be stated as follows:

- prohibition of Providing Bribes;
- prohibition of Receiving Bribes;
- prohibition of bribery of any Public Official, Foreign Public Official, Official of a Public International Organization i.e. providing or promising to provide (directly or via any third persons) to any such person any financial and/or other benefit/advantage in order to affect performance of his/her official or obtaining other benefits both for oneself and for third parties;

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- prohibition of conniving at bribery, i.e. lack of adequate controls in a for-profit organization, aimed at prevention of providing or receiving bribes by such organization's Associated Persons in order to win or retain business, or secure commercial and competitive advantages;

- prohibition of Commercial Bribery;

- prohibition of mediation in bribery, i.e. prohibition of giving a bribe directly to a Public Official, Foreign Public Official or Official of a Public International Organization (the "bribe-taker") on a commission of the bribe-giver or bribe-taker, as well as prohibition of any other facilitation to a bribe-giver or bribe-taker in accomplishing or implementing any their consent to Receive and Provide a Bribe.

In the above context Employees are strictly prohibited from directly or indirectly, either personally or via third person mediation in taking part in any corruption activity, or offering, giving, promising, asking for and accepting bribes (Illegal Remuneration), or making any payments to facilitate completion of any administrative, bureaucratic or other formalities in whatever form, including but not limited to in the form of cash funds, things of value, services or other benefits, to any persons and from any persons or organizations, including for-profit organizations, public governmental and self-administration authorities, Public Officials, Foreign Public Officials, Officials of Public International Organizations, private companies and representatives thereof, as well as being involved in conniving at Corruption.

4 Key principles of the Policy


4.1 Top Management mission

The Top Management of the Company shall set up an ethical standard of "zero tolerance" of any forms and manifestations of Corruption at all levels, leading by example in their behavior and ensuring full awareness of all Employees and Business Partners with this Policy.

4.2 Powers and liability of the Office of Assurance of Compliance with Anti-Corruption Standards

Implementation of the standards and requirements of CPMF and anti-corruption law, as well as supervision of compliance with them in the Company, rest with the Asset Protection Department (hereinafter the "APD"), which is independent from monitored procedures and business processes elements (hereinafter the "BP"), in which CPMF standards and requirements are embedded. APD is also entitled to directly approach the Top Management wherever it is necessary to escalate any issue or problem related to corruption or CPMF operation to a higher level of priority. APD is empowered with sufficient authority and resources for the development and introduction of CPMF requirements and compliance with them by the Company.

The Head of the APD as a body ensuring compliance with anti-corruption standards is responsible for and authorized to carry out:

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- development, implementation and maintaining in a proper working order of the processes required for CPMF operation;
- collection and analysis of data on CPMF operation and provision of a relevant report to the member of the Top Management who is responsible for CPMF;
- control over the persons appointed as responsible for CPMF within the scope of CPMF operation;
- provision of consulting and recommendations to Employees on matters related to CPMF and Corruption prevention;
- making arrangements for and implementing CPMF training.

4.3 No acceptance of corruption

The Company adheres to the principle of non-acceptance of corruption in any form ("zero tolerance" principle) in the course of financial and business activities, including relations with Business Partners, Public Officials, Foreign Public Officials, Officials of Public International Organizations, its own Employees or any other persons.

4.4 Unavoidable punishment

The Company adheres to the principle of inevitable punishment for Employees, regardless of their position, length of service, status and other relation to the Company for any forms and manifestations of corruption, and is fully responsible for consideration of the facts of Corruption-related violations, holding the perpetrators liable in the manner established by applicable Russian law and Internal Policies and Regulations.


4.5 Periodic assessment and mitigation (elimination) of Corruption Risks

As part of the activities aimed at mitigating the impact of Corruption Risks, APD, alongside the Company Risk Manager, regularly carries out identification and undertake follow-up efforts to reduce the impact of Corruption Risks, paying particular attention to the risks identified through the analysis of internal and external factors affecting the Company, typical for its activities, regions of presence, as well as potentially vulnerable business processes. The Company develops and implements anti-corruption procedures that are reasonable and adequate to the level and nature of identified risks.

4.6 Relations with Business Partners

The Company seeks to cooperate only with trustworthy Business Partners, which adhere in their activities to the principles of legality, transparency, and are ready to comply with the requirements of this Policy and Anti-Corruption Law and provide assistance in terms of ethical conduct of business and Corruption Prevention.

The Company strongly encourages adoption by its Business Partners of corporate documents similar to this Policy as regards prevention of involvement in corruption activities.

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4.7 Relations with Public Officials, Foreign Public Officials, Officials of International Public Organizations

The Company shall refrain from payments of any expenses of Public Officials, Foreign Public Officials, Officials of Public International Organizations and their Associated Persons (or to their benefit) in order to obtain or keep benefits in commercial activities, including payments of expenses for transportation, accommodation, food, entertainment, etc., and also from provision to them of any other benefits at the expense of the Company.

4.8 Provision of information and training

The Company shall make this Policy public by posting it on the Company website in the Internet information and telecommunications network at www.company.rt.ru, make all its Employees aware of it, publicly declare its non-acceptance of Corruption, welcome and encourage compliance with principles and requirements of this Policy by its Employees, Business Partners and others.

The Company shall facilitate improvement of anti-corruption culture by informing and training Employees and Business Partners in order to keep them well-informed about fighting Corruption.

4.9 No-retaliation policy

No sanctions can be applied to an Employee for:


- refusing to Provide or Receive a Bribe, commit Commercial Bribery or act as an intermediary in bribery including cases where as a result of such refusal the Company suffers damage, loses profit or does not receive commercial and/or competitive advantages;
- bona fide reporting alleged violations of this Policy, CPMF and Anti-Corruption Law, instances of Corruption, other abuses or inadequate efficiency of current CPMF control procedures (except for cases where the Employee was himself/herself involved in the violation);
- refusal to take part in any operation where an Employee reasonably assumed the presence of a Corruption Risk level, higher than the low level of the Corruption Risk, as determined by the Company.

4.10 Monitoring and control

The Company shall monitor effectiveness of adopted procedures focused on Corruption Prevention, control adherence to them and enhance them when necessary.

4.11 Continuous CPMF enhancement

The Company constantly works on continuous improvement of the corporate CPMF through monitoring, updating and revision of financial and non-financial controls, conducting internal CPMF audits, comprehensive audits through implementation of corrective activities plans, as well as decisions of the Top Management taken on the basis of periodic reports on CPMF performance.

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5 Policy lines

5.1 IPRs development and implementation

In addition to CPMF components that are embedded into the Company business processes, across which a scheduled review is carried out based on a systematic analysis, and, if necessary, changes are made in order to improve CPMF performance, anti-corruption examination and validation of the key corporate Internal Policies and Regulations and their draft versions is carried out in the Company to identify provisions contributing to creating conditions for Corruption (corruption-causing factors), and work out proposals for their elimination.

5.2 Conflict of Interests

Under CPMF, the Company has adopted procedures to manage a Conflict of Interests. Management of conflicts of interests is one of the major anti-corruption mechanisms; in this regard, the Company pays great attention to prevention of realization of Corruption Risks and their mitigation.


Any Employee in the course of performing his/her duties shall be guided by the interests and goals of the Company and avoid situations or circumstances in which his private interests would contradict the interests and purposes of the Company. In the event that a Conflict of Interests occurred (or a possibility thereof exists), an Employee shall report this to the Company as prescribed in the Regulations on conflict of interest management in Rostelecom so that relevant responsive measures could be taken as appropriate.

5.3 Gifts, business hospitality and entertainment expenses

Gifts and business hospitality, including performance of works, granting discounts, rewards and other benefits, shall not put the receiving party in a dependent position. Employees may accept from third parties and offer business gifts and business hospitality, if those gifts comply with all of the following principles:

- they meet the requirements of the applicable law and internal policies and regulations of the Company;
- they cannot be deemed as Commercial Bribe or an attempt to bring influence on proper and unbiased performance by Employees of their duties;
- they are not received or offered on a regular basis;
- they do not create reputational or other risks for the Company in the event of disclosure of information about gifts or hospitality expenditures;
- they are not offered or received in the course of procurement procedures and/or during direct talks when making contracts with the Company business partners;
- they are not given in the form of cash or non-cash funds, regardless of currency, on behalf of the Company, its Employees and representatives.

Under no circumstances shall Employees accept gifts from Business Partners and other third parties in the form of money, either in cash or non-cash funds, regardless of the currency, or

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ask for any gifts or personal benefits of any kind, *inter alia*, on behalf of the Company, its employees or representatives.

It is not allowed to give any gifts to Public Officials, Foreign Public Officials, Officials of Public International Organizations, with the exception of gifts stipulated by applicable Russian or International (if applicable) law. An Employee giving a gift to a Public Official, Foreign Public Official, Official of a Public International Organization shall study the basic documents confirming the value of the gift, and be ready to confirm the purpose and reason for giving the gift to avoid any suspicions of bribery. In accordance with applicable Russian law, giving any gift, regardless of its value, provision of business hospitality, paying for entertainment, provision of pecuniary services to a Public Official, Foreign Public Official, Official of a Public International Organization, business representative can, under certain circumstances, be regarded as Providing a Bribe or Illegal Remuneration if the gift is given for an action (omission) of a Public Official, Foreign Public Official, Official of a Public International Organization, or business representative, as well as general favor or indulgency in terms of their jobs.

If there is any doubt about giving or receiving a gift, an employee may contact the APD for guidance.

No gifts or entertainment expenses may be received or provided if the acceptance or provision of such benefits places their recipient in the position of an owing party.


While bearing entertainment expenses, Employees must act in good faith, reasonably and in strict accordance with applicable Russian law and Internal Policies and Regulations of the Company. Any misuse of the Company's funds will incur liability in accordance with applicable Russian law and Internal Policies and Regulations of the Company.

5.4 Training

The Company provides both distance and full-time training to Employees on the Code of Ethics of PJSC "Rostelecom" and requirements of the Anti-Corruption Law. Employees newly hired by the Company shall take the introductory distance-training course "The Code of Ethics of PJSC "Rostelecom", which includes, *inter alia*, requirements for compliance with the Anti-Corruption Law. In addition to this training, Employees holding high-rank positions or positions susceptible to a high risk of corruption shall take a mandatory advanced course on Corruption Prevention in the Company in the personal presence or distant learning format.

5.5 Comprehensive and corporate audit

A comprehensive audit carried out in relation to the existing or potential Employees of Company, Business Partners, as well as individual projects, works, transactions or relationships is one of the most important CPMF elements. A comprehensive audit aims to check the correctness, sufficiency, transparency and information capacity of implemented

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business processes in terms of compliance with the Anti-Corruption law, CPMF and this Policy.

The Company refrains from cooperation with Business Partners or staff if such cooperation results in violation of the principles and requirements of this Policy or provisions of the Anti-Corruption law.

The Company shall make reasonable efforts to minimize the possibility of realization of Corruption Risks in relations with its Business Partners that may be involved in corruption activities, as well as with regard to Employees whose duties are likewise susceptible to corruption risks, and to this end a comprehensive audit is undertaken before starting the relations.

In order to comply with the principles and requirements set forth in this Policy, the Company shall include anti-corruption provisions (clauses) in contracts or agreements made with its Business Partners and Employees whose duties are subject to Corruption Risks, and shall reserve the right to terminate the contracts in the event of detection of any corruption activities on the part of a Business Partner or Employees whose duties are subject to corruption risks.

In the event of realization of a risk of violation of CPMF requirements, this Policy, provisions of the Anti-Corruption Law or instances of Corruption are discovered, procedures of assessing such events shall be triggered, and, if necessary, corporate audits are performed. Appropriate measures shall be taken based on the outcome of the corporate audit.

5.6 Participation in Charity and Sponsorship activities

The Company, as a socially responsible member of society, carries out charity activities. The Company does not provide financing to charitable and sponsorship projects in order to obtain or preserve commercial advantages, nor does it contribute donations to any political activities.


The Company controls intended use of the funds provided in the course of Charity and Sponsorship activities.

Information on Charity and Sponsorship activities is available at the Company website in the Internet information and telecommunications network - <https://www.company.rt.ru>, or is disclosed in another way, *inter alia*, through mass media.

Employees are entitled, in accordance with applicable Russian law, to be members of public associations, such as political parties, public organizations, citizen groups, public funds, and other non-profit organizations, which do not aim to obtain or preserve an advantage for the Company as regards commercial activities.

5.7 Interaction with intermediaries and third parties

Neither the Company, nor its Employees are allowed to engage or use intermediaries, partners, agents or any other third parties to perform any activities that contradict the

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principles and requirements of the Anti-Corruption Policy or provisions of the Anti-Corruption Law.

The Company ensures the existence of verification procedures with respect to intermediaries, partners, agents, and other third parties to mitigate or prevent risks of involvement of the Company in corruption activities.

To implement the principles and requirements set forth in the Policy the Company shall include anti-corruption provisions (clauses) in contracts made with intermediaries, partners, agents and other third parties.

5.8 Financial and non-financial control

CPMF procedures include financial and non-financial control. All financial and business operations shall be entered in the Company book and tax records, recorded and made accessible for an audit.

Provision of inaccurate information on the financial position and property status of the Company as a result of violation of the established procedure for bookkeeping and tax accounting, or misrepresentation of accounting, statistical, tax and financial statements shall not be permitted.

Anti-corruption control measures are embedded into main processes within the business process framework of the Company. Also, no distortion of information related to non-financial control measures shall be permitted.


5.9 Handling violations reports

Under CPMF Employees acting in good faith or on a reasonable assumption are provided with a capability of reporting suspected or committed cases of corruption offenses or other violations, as well as CPMF failures using feedback channels. These channels can also be used by Business Partners and other persons.

An employee that became aware of a violation of this Policy, the Anti-Corruption law or Internal Policies and Regulations by another Employee, Business Partner or any other person, as well as of an expected or alleged violation, shall immediately report this, identifying himself, or anonymously in one of the following ways:

- personally inform an employee of Asset Protection Department of the Company;
- call the Line of Trust of PJSC "Rostelecom" at **8-800-1-811-811**;
- fill out a feedback form for receiving violation reports on Rostelecom anti-corruption portal at www.nocorruption.rt.ru;
- send a report to the following email address: ethics@rostelecom.ru.

Employees, Business Partners and other persons (hereinafter - the "informers") may report their suspicions of violation of the requirements of this Policy or Internal Policies and Regulations anonymously without disclosing their personal data. Nevertheless, if an informer identifies itself, the Company will be able to communicate with him/her in the

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course of an internal audit and give him/her feedback on its results, which will increase the effectiveness in elimination of the violation.

By submitting personal data, the informer confirms his/her consent to their processing pursuant to applicable Russian law.

The Company guarantees that the informer's personal data, as well as information provided, will be used on a confidential basis only for the purpose of conducting a corporate audit and only by those directly involved in carrying out the necessary activities.

The Company agrees not to allow any sanctions against bona fide informers reporting such violations. Any harassment or pressure on informers reporting violations and/or participating in corporate audits is prohibited.

5.10 Audit and control

The Company regularly performs internal and external audits of financial and economic activities, monitors the completeness and accuracy of the data entered in the accounting and tax records and controls compliance with the requirements of the Anti-Corruption Law and internal regulations, including the principles and requirements established by this Policy.

As part of the internal control procedures, the Company carries out the check of:


- efficiency and effectiveness of activities, including meeting financial and operational values, the safety of assets;
- the accuracy of the accounting (financial) and other statements and their timeliness;
- compliance with applicable law while performing financial and economic activities, bookkeeping and tax accounting.

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6 Corruption Prevention

Corruption prevention in the Company is ensured by the following measures:

- applying consistently a common unified Corruption Counteraction Policy at the Company level, fostering the culture of zero tolerance of corruption by staff members;
- cooperation of the Company with government authorities, state-owned and commercial organizations, civic institutions with regard to combatting corruption;
- taking measures aimed at a wider involvement of staff members in combatting corruption, development in the Company of a negative attitude towards corrupt behavior;
- improvement of the Company's internal control system in terms of compliance with the requirements of the Anti-Corruption Law;
- ensuring transparency, fair competition and neutrality in the course of financial and business activities of the Company and its cooperation with Business Partners;
- improvement of the procedures governing the use of the Company's property and resources and mechanisms of transfer and disposals of property rights;

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- training and consultation of employees with regard to combatting corruption;
- introduction into Company's HR practices of certain compliance requirements for the Company executives and candidates for the Company senior management;
- implementation in the Company's HR practices of rules according to which long-term, impeccable and effective performance by an Employee of his/her duties in compliance with this Policy shall be taken into account when making a decision on employee's promotion;
- improvements in the anti-corruption portal nocorruption.rt.ru aimed at making Employees, Business Partners and other persons more knowledgeable in law.

7 Reports

Based on the outcome of effort to control and monitor compliance with provisions of this Policy and CPMF requirements, the Anti-Corruption Law, as well as on the analysis of their effectiveness and sufficiency, relevant reports are generated on a regular basis. The reports are submitted to the Top Management to confirm that CPMF is adequate for management of identified Corruption Risks, compliance with the requirements imposed on CPMF by the Company, and its effective and efficient application. Based on the results of reporting, the Top Management will make decisions related to the possibilities of CPMF improvement.

8 Liability

The Company Employees, regardless of their position shall be held liable according to applicable Russian law and/or the terms of a labor contract for violation of the principles and requirements of the Policy, CPMF, the Anti-Corruption Law as well as for the actions (omissions) of their subordinates resulting in violation of these principles and requirements.

Persons failing to meet requirements of the Anti-Corruption Laws may be subject to disciplinary, administrative, civil or criminal liability at the initiative of the Company, law enforcement agencies or other third parties in the manner and on the grounds provided for in the legislation of the Russian Federation, Internal Rules and Regulations of the Company and/or labor contracts.

9 Concluding provisions

Rostelecom Anti-Corruption Policy is subject to approval by the Company Management Board.

Rostelecom Management Board is entitled at any time to make amendments and additions to this Policy based on the interests of the Company, its shareholders, investors and other stakeholders.