

**PRINCIPLES AND GUIDELINES
FOR CONDUCTING CHARITABLE ACTIVITIES
AND RISK MANAGEMENT
OF THE VLADIMIR POTANIN
FOUNDATION**

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GENERAL PROVISIONS

Our position is to carry out the Vladimir Potanin Foundation (hereinafter, the **Foundation**) activities effectively, in good faith and ethically. We take this very seriously. We are committed to the highest standards of integrity and professional ethics and expect all the Foundation's Employees, members of the Supervisory Board, Foundation Board, Council for the Endowment Use, Experts and members of the Expert Councils of the Foundation, Beneficiaries and Grantees, Counterparties, partners and other parties involved in Foundation's activities always to act in an honest and ethical manner, to comply with the legal requirements, to avoid any real and potential conflict of interest in performance of their official duties.

The Principles and Guidelines for Conducting Charitable Activities and Risk Management of the Foundation (hereinafter, the **Code of Ethics**) embody the philosophy and mission of the Foundation; they are inextricably linked with the implementation of our strategy. They establish our principles and values, as well as the traditions and standards of conduct that have developed over the years of the Foundation's operation.

The Code of Ethics sets out key standards and procedures required for the compliance therewith. Compliance with the standards is a basis of our relations within the Foundation and with the outside world. We expect that, by acting in compliance with the Code of Ethics, we support an organizational culture, which provides for acceptance, appreciation and demonstration of the honest and ethical conduct by all Foundation's Staff Members and individuals involved in the Foundation's activities.

The actions that violate the Code of Ethics shall be deemed unacceptable and inconsistent with the Foundation's principles.

The Code of Ethics describes our standards and rules and procedures required to comply therewith, and covers the following issues:

1. Mission and values
2. Terms and definitions used in the Code of Ethics
3. Our interactions
4. Foundation's standards of work
5. Risk management
6. Avoidance of the conflict of interest
 - 6.1. Grants and program activities
 - 6.2. Relations with contractors and suppliers of services and goods
 - 6.3. Business gifts and hospitality
 - 6.4. Working outside the Foundation, teaching and consulting
 - 6.5. Participation as subscribers or members of management bodies of other organizations, external expert and (or) public councils
 - 6.6. Public speaking and publications
 - 6.7. Receiving of payment for participation in the activities of other organizations involving speeches and publications
 - 6.8. Academic degrees and honorary titles of higher educational institutions

7. Confidentiality and disclosure
8. Compliance with legal requirements and official guidelines
9. Financial information and reporting standards
10. Non-involvement in political activities
11. Interaction with public officials
12. Anticorruption compliance and inadmissibility of illegal actions related to the legalization (laundering) of proceeds of crime and terrorist financing
13. Compliance with the Code of Ethics and whistleblowing
14. Procedure for revising and amending the Code of Ethics

1. MISSION AND VALUES OF THE FOUNDATION

- 1.1. The purpose of the Code of Ethics is to disseminate values and principles that must be applied in any activity we carry out on the Foundation's behalf on a daily basis in performance of any activities.

- 1.2. Mission

- 1.2.1. We develop a culture of giving and unite active creative professionals involved in addressing socially significant issues and making sustainable social changes. We offer opportunities for new ideas and create conditions for their implementation.

- 1.3. Principles and values

- 1.3.1. Transparency

We strive for maximum transparency of our activities, i.e. we clearly define the principles of our activities and strictly follow the accepted rules. We report on the progress and results of our work to our partners and the public

- 1.3.2. Creativity

We welcome active creation, innovation and creativity in any endeavors. We help each team member, Beneficiary, Grantee and partner to unleash their creative potential.

- 1.3.3. Professionalism

In our work, we always focus on professional standards, from organizing our own activities to selecting partners. We actively search for, study, apply and share the best practices in our areas of activity. We do not stop on the achieved results, are constantly in progress and strive to address new issues.

- 1.3.4. Responsibility

We are responsible for our activities and for addressing our issues. We are guided by a "do no harm" principle, i.e. we carefully assess the potential risks for the Beneficiaries, Grantees and Foundation's partners and strive to reduce or eliminate them. Our management decisions are based on objective and reliable information, which is as complete as possible.

1.3.5. Personalized attention

We believe that every person is unique, and we try to find an individual approach to everyone. We respect the diversity of personal values, opinions and outlooks and value each person for his/her uniqueness.

1.3.6. Equal opportunities

We understand the difference between formal and real equality, and we consistently implement this understanding. We provide equal opportunities for cooperation to all applicants, Beneficiaries, Grantees and partners, strive to expand access to our activities for the people with special needs and ensure an accessible and comfortable physical and psychological environment for everyone to participate in our competitions.

1.3.7. Courage

In order to make positive and sustainable changes, we take the initiative and motivate the active involvement of all stakeholders. We are open to experiments and nonstandard solutions. We support the search, use and replication of new approaches, methods and technologies in our areas of activity.

1.3.8. Holistic (result oriented) approach

In our activities, we use a wide range of models and tools, e.g. information, expert, educational, competitive tools. We focus on tangible, measurable practical outcomes and their long-term impact.

2. TERMS AND DEFINITIONS USED IN THE CODE OF ETHICS

- 2.1. **Anticorruption Policy** is the Anticorruption Policy of the Vladimir Potanin Foundation approved by the General Director of the Foundation, as amended from time to time, which is available on the official website of the Foundation at <https://fondpotanin.ru/en/>.
- 2.2. **Beneficiary** is an individual or a legal entity receiving funds or other means of support from the Foundation within the framework of realization of charity programs.
- 2.3. **Close relative** is a spouse, parent, son or daughter, spouses of the children, full and half siblings, uncle, aunt, nephew (niece), cousin, grandchildren, grandmothers, grandfathers, as well as the following relatives on the spouse's part: mother, father, sister, brother, son or daughter.
- 2.4. **Public Official** is any Russian or foreign person appointed or elected to hold (occupy) a position in a legislative, executive, administrative, law enforcement or judicial authority or public international organization; any person exercising a public function for the state, including for a public authority, state corporation, state-owned company, public-law company; leading political figures, officials of political parties, including candidates for political office; ambassadors, heads of public authorities, state corporations, state-owned companies, and public-law companies.
- 2.5. **Grantee** is an individual or a legal entity receiving free and irrevocable support from the Foundation in forms of funds or in kind for the implementation of projects in areas of activity supported by the Foundation.
- 2.6. **Counterparty** is a legal entity or an individual with which the Foundation enters into contractual relations, except for the labor relations.
- 2.7. **Corruption** is abuse of office, Bribe giving or taking, abuse of powers, commercial bribery or other illegal use by a person of their position contrary to the legitimate public and state interests for gaining benefits in the form of money, valuables, other assets or property-related services, other property rights for himself/herself or third parties, or illegal granting of such benefits to such person

by other individuals. Corruption also includes such actions taken on behalf or for the benefit of a legal entity.

- 2.8. **Conflict of Interest** is a situation where Personal Interest (whether direct or indirect) of a Foundation's Staff Member affects or may affect proper performance by such Staff Member of his/her employment or other duties and where a conflict arises or may arise between Personal Interest of a Foundation's Staff Member and rights and legitimate interests of the Foundation, which may cause damage to the rights and legitimate interests, assets and (or) goodwill of the Foundation.
- 2.9. **Legalization (Laundering) of Proceeds of Crime** is, in accordance with Paragraph 3 of Article 3 of Federal Law No. 115-FZ On Combating Legalization (Laundering) Proceeds of Crime and Terrorist Financing dated August 7, 2001, giving a legal form to the possession, use or disposal of the funds or other assets obtained as a result of a crime.
- 2.10. **Whistleblowing Hotline** is a set of organizational measures and technical means that makes it possible to receive from the Foundation's Staff, Counterparties and other third parties whistleblowing reports concerning the Foundation, its business activities, as well as to record and review, analyze and summarize the information received.
- 2.11. **Personal Interest** is the interest of a Foundation's Staff Member related to the possibility of such Staff to receive income in the form of money, valuables, other assets or property-related services, other property rights for himself/herself or for third parties when performing their duties.
- 2.12. **Founder of the Foundation** is Vladimir Olegovich Potanin. The founder of the Foundation initiated the development of systemic philanthropy in Russia by establishing the Foundation on January 10, 1999, for which reason the Foundation is named after Vladimir Potanin.
- 2.13. **Gift** is any valuables in tangible or intangible form, for which there is no obligation to pay, that is, transferred free of charge, including items, stuff, gift certificates for any goods and services, event invitations (for concerts, tours, sports, etc.), money, securities and other assets, benefits and property-related services, including works, services, payment for entertainment, transportation costs, loans, discounts, making property available for use, including housing, etc.
- 2.14. **Supervisory Board** is a collegial body of the Foundation that oversees the activities of the Foundation, decisions made by other bodies of the Foundation and their implementation, the use of the Foundation's funds and compliance with the laws of the Russian Federation.
- 2.15. **Hospitality Expenses** are the Foundation's expenses for official receptions, visiting of cultural and entertainment events, catering at business meetings, transport support, translator's fees and other organizational expenses permitted by the laws.
- 2.16. **Employees** are the individuals employed by the Foundation.
- 2.17. **Council for the Endowment Use** is a collegial body of the Foundation formed in accordance with Federal Law No. 275-FZ On the Procedure for Establishment and Use of Endowment by Non-Profit Organizations dated December 30, 2006.
- 2.18. **Foundation Board** is the supreme collegial body of the Foundation, the main function of which is to ensure that the Foundation meets the goals for which it was established.
- 2.19. **Staff Members** are the Foundation's Employees as defined above, as well as persons that perform work or provide services for the Foundation under civil law contracts entered into therewith, including members of the Foundation Board, Supervisory Board, Council for the Endowment Use, Experts and members of the Expert Councils, counterparties providing services on the basis of civil law contracts concluded with the Foundation.

- 2.20. **Subscriber of the Foundation** is a person who shares the mission and values of the Foundation, contributes to its sustainability and has received such a status in a manner prescribed by the laws.
- 2.21. **Terrorist Financing** is, in accordance with Paragraph 4 of Article 3 of Federal Law No. 115-FZ On Combating Legalization (Laundering) of Proceeds of Crime and Terrorist Financing dated August 7, 2001, provision or collection of funds or financial services with the knowledge that they are intended to finance the organization, preparation, and commission of at least one crime specified in Articles 205, 205.1, 205.2, 205.3, 205.4, 205.5, 206, 208, 211, 220, 221, 277, 278, 279, 360, and 361 of the Criminal Code of the Russian Federation, or to finance or otherwise provide material support to a person for commission of at least one of the specified crimes, or to support an organized group, illegal armed group, or criminal association (criminal organization) established or to be established in order to commit at least one of the specified crimes.
- 2.22. **Expert Council** is a collegial body of the Foundation, formed from among experts of specific competition to determine the composition of finalists or winners.
- 2.23. **Experts** are specialists hired by the Foundation to evaluate competitive applications of potential Beneficiaries, Grantees, conduct research, participate in events held by the Foundation and (or) its partners. Represent a non-profit sector, charity, areas of endowment, fundraising, jurisprudence, social sphere, culture, museums, creative industries, education, popularization of science, information technology and other areas related to the spheres activities of the Foundation.

3. OUR INTERACTIONS

- 3.1. In our activities, we are guided by the principle of decision-making discretion, independence of the Foundation's bodies and accountability to the public. It is critically important for us to follow the principles of integrity and respect our values in all our interactions, wherever we operate. This is the basis of our professional approach to charitable activities, maintains our reputation and contributes to the confidence of the Founder, Subscribers, Beneficiaries, Grantees, Counterparties, partners, professional community in Russia and abroad, the public as a whole.
- 3.2. Each Staff Member shall treat his/her colleagues within and outside the Foundation, the competition applicants, Beneficiaries, Grantees, Experts, Counterparties, consultants, mass media and members of the public in an impartial, professional and respectful manner. This obligation applies to all our interactions regardless our work location, i.e. in the Foundation's office, in the offices of our partners, Beneficiaries and Grantees, on the business trips and at the events, in any public spaces in Russia and abroad.
- 3.3. We do not allow direct or indirect discrimination, humiliation, persecution, unfair treatment of any person on any basis.
- 3.4. Aggression, intimidation, harassment and insult of the Staff Members and/or persons involved in the Foundation's activities are not allowed in any form (including actions, words, jokes, comments, etc.). The consequences of a violation of this part of the Code of Ethics shall be the most severe. Each situation shall be assessed taking into account all relevant circumstances. In case of misconduct, appropriate action shall be taken against the Staff Members, up to termination of any relations. Physical abuse against other persons in any form shall have severe consequences.
- 3.5. We do not accept bribery or any other form of Corruption.
- 3.6. We do not accept any activities related to the Legalization (Laundering) of Proceeds of Crime and Terrorist Financing.
- 3.7. We do not and will not attempt to influence upon other persons making decisions or allow other persons to unduly influence upon us by exchanging anything of value, including Gifts, hospitality, funds, services, bonuses, discounts. We avoid any actions that might be considered undue influence.

- 3.8. We guarantee that our personal interests and relations shall not result in Conflict of Interest or even a potential opportunity to influence upon our decisions and professional judgments.
- 3.9. In cooperation with third parties, we guarantee good faith and expect the same from the third parties. We only cooperate with the third parties that have necessary qualifications and experience and maintain standards of ethical conduct consistent with our standards. We only pay a fair remuneration for the work they perform.
- 3.10. We maintain our standards of integrity in any case and do not allow, request or make it possible for anyone to act improperly on our behalf.
- 3.11. We are aware of severity of the child protection problem and comply, to the extent applicable to the Foundation's activities, with all laws and official guidelines that are in force at any time for protecting and defending children as well as the principles of the United Nations Convention on the Rights of the Child dated November 20, 1989.
- 3.12. We respect and protect the confidentiality of personal data when collecting, using, storing, transferring and/or disclosing such data, and perform the said actions honestly, transparently and through secure channels and means.
- 3.13. The reputation and image of the Foundation are important components of our activities. We always keep our promises. We speak about our activities and ourselves in a fair and responsible manner and timely disclose reliable data on the grants, donations, interactions and payments. In our public reports, we openly and honestly inform the Subscribers, Beneficiaries, Grantees, Counterparties, partners, professional community and the public of our activities and performance. We use social media and other online communities in a responsible manner.
- 3.14. When communicating with the competition applicants, Beneficiaries, Grantees and partners, we strive to combine a business approach with the personal engagement and responsiveness.
- 3.15. We do not allow considering appeals and complaints in a purely formal manner. The Foundation makes any decisions subject to an objective and impartial consideration of all facts. We treat each appeal with care and set ourselves a task of giving feedback as qualitatively and promptly as possible in accordance with the Interaction Standards adopted by the Foundation.
- 3.16. The Foundation operates a Whistleblowing Hotline aimed at preventing and combating possible abuse, corruption, violations of internal policies and guidelines. All incoming communications to the Whistleblowing Hotline are subject to mandatory logging and consideration with a feedback.
- 3.17. Each Staff Member understands that damage to the Foundation and its reputation is unacceptable. We do not allow statements or actions that could damage the Foundation, its reputation or the reputation of its Founder, Subscribers or partners.
- 3.18. All Foundation's Staff Members shall act in strict compliance with the principles, provisions and requirements of this Code of Ethics, as well as the Anticorruption Policy adopted by the Foundation and available on its official website.

4. FOUNDATION'S STANDARDS OF WORK

- 4.1. We do our work in a skilled and good faith manner. Our conclusions and decisions may only be based on reliable and objective information. In our professional activities, we are always guided by the statutory provisions, job duties established by the Foundation policies and rules for conducting charitable activities. Each of us strives to carry out his/her responsibilities in full and in a responsible manner and to contribute to the mission and strategy of the Foundation.
- 4.2. We welcome active creation, search and development of new ideas, approaches, methods and technologies in our areas of activity. We help each team member, Beneficiary, Grantee and partner

to unleash their creative potential. We strive to actively and freely disseminate ideas, knowledge, and best practices in our areas of activity and ensure the availability of the intellectual property. At the same time, we strictly observe the intellectual property rights of third parties. In our work in the Foundation, various products and works are created which may be treated as intellectual property and be subject to the intellectual property rights. We understand that such products and works are deemed proprietary, as we create them in the performance of our employment duties and/or on a duly executed assignment of the Foundation's management. A Staff Member or a group of the Staff Members who created such a work (intellectual property) shall be the authors of a work for hire, have personal non-property rights (in particular, right of authorship, author's right to a name, right to privacy of the work, etc.). The Foundation is assigned an exclusive (property) right to the works for hire.

- 4.3. The heads of the Foundation's units are responsible for ensuring the effective interaction of the units for the benefit of the Foundation. The heads shall demonstrate a respectful and friendly attitude to all Foundation's Employees and its partners in order to be a standard of conduct for the Staff Members of their unit.
- 4.4. The Foundation's Staff Members shall contribute to the development and enhancement of the Foundation's reputation and shall not accept conduct that could affect it.
- 4.5. We treat all colleagues in the Foundation with respect and friendliness. Each of us is a valuable and respectable member of a team of like-minded professionals.
- 4.6. The Foundation develops and maintains a positive working environment in which all Staff Members always feel respected, supported and safe. The discrimination and sexual and other harassment are unacceptable and do not meet our standards of respectful and professional workplace relations. The Foundation prohibits any form of harassment or intimidation. The Foundation shall promptly investigate all complaints against harassment or discrimination and shall act accordingly. The harassment (retaliation) against a Staff Member for reporting discrimination and harassment or for participating in the investigation of such facts is prohibited.
- 4.7. The decisions to hire, give incentives to, develop and promote the Staff Members shall be made solely on the basis of their skills, work experience, attitude to others, work performance and demonstrated potential subject to the requirements to a particular position.
- 4.8. The Foundation strives to develop the talents of the Staff Members and supports everyone in striving to unleash his/her potential.
- 4.9. We use effective occupational health and safety systems for our Staff Members, as well as environmental protection systems. We support environmental initiatives, including recycling of plasticware and careful treatment of paper.
- 4.10. The Foundation's remuneration system is focused on the formation and development of human resources, engagement of the best professionals in the labor market and retention of skilled and high-potential Staff Members. The remuneration of the Staff Members depends on their level of professional competence, position and contribution to the achievement of strategic goals and implementation of the mission. The incentive system adopted by the Foundation in addition to the remuneration focuses on creating conditions for the professional and personal development of the Staff Members.
- 4.11. We effectively and efficiently manage financial, tangible and intangible resources and protect the Foundation's assets, including technologies and systems used in the charitable activities.
- 4.12. The Foundation's resources may not be used for personal purposes. Our rule is not to do anything not related to the Foundation in the Foundation's office during working hours without special agreement with the Foundation's management. The Foundation's information systems, including email, as well as technical devices provided to the Foundation's Staff Members, shall be used solely for the performance of their duties and not for personal purposes.

- 4.13. Our rule is also to prevent the Foundation from using the personal property of the Employees in its activities. The exceptions are subject to the Employee's consent and proper registration of the use of his/her personal property with the payment of a compensation to such Employee. In case of use of the Foundation's or Employee's property, we shall take all actions for preventing any damage to either of the parties.
- 4.14. Each Foundation's Staff Member shall share the values, principles and guidelines of conduct set out herein. Each Foundation's Staff Member acknowledges the validity of the Foundation's rules and regulations, and consciously and freely assumes responsibility for the compliance therewith. The Foundation attempts to be as loyal and flexible as possible when establishing internal rules and regulations.

5. RISK MANAGEMENT

- 5.1. A flexible and proactive approach to the Foundation's activities, which is most effective for implementing the Foundation's mission, is important to us. For this purpose, we use a risk-oriented approach that allows us to achieve our goals by reducing risks and prioritizing areas, which require particular attention.
- 5.2. The Foundation's risk management process is based on a distributed model with a variety of individual approaches for each of the key business processes and the involvement of all Staff Members.
- 5.3. The risk management compliance system allows us to effectively monitor risks, promptly respond to changes therein and minimize administrative expenses in relation to the costs of the Foundation's substantive activities aimed at implementing its mission.
- 5.4. In terms of risk management, we are guided by the best standards and practices and adhere to the principles of efficiency, continuity and complexity of the risk management.
- 5.5. The Foundation's risk management system includes:
- adoption of internal regulations and tools;
 - analysis of internal and external risks and their assessment;
 - identification and monitoring of applicable regulatory requirements and best practices;
 - distribution of roles and responsibilities of Staff Members in the risk management system;
 - establishment and further performance of responsibilities to comply with the above requirements and to mitigate the identified risks;
 - activity planning and control of the identified risks;
 - risk treatment with determination of methods, set of actions and measures for further control;
 - evaluation of performance and consideration of violations by the Staff Members of the legal requirements and Foundation's internal regulations;
 - making changes to the compliance system subject to changes in applicable laws and the best practices.
- 5.6. Based on the specifics of the Foundation's activities, the Foundation's activity is exposed to the following risks:

- legal risks, i.e. the Foundation and its Staff Members shall be aware of the applicable laws, comply with legal requirements and monitor legislative changes;
 - financial risks, i.e. the Foundation, as a non-profit organization funded from the endowment ensures its activities and provides are to support Beneficiaries and Grantees, and guarantees transparency and understanding how funds are distributed and who receives them;
 - reputational risks, i.e. the Foundation's operation is based on our impeccable reputation and confidence of the Founder, Subscribers, Beneficiaries, Grantees, partners and Counterparties;
 - operational risks, i.e. the effective Foundation's operation consists in the coordinated actions of its Staff Members on the effective management of the internal processes.
- 5.7. Since corruption-related violations may lead to an increase in the level of risks in all of the above areas and are unacceptable to the Foundation, the Foundation's risk management system is primarily aimed at strict compliance with the anticorruption requirements and avoidance of any such possible violations.
- 5.8. As part of the risk assessment, the Foundation gives importance to verifying the integrity and reputation of its Beneficiaries, Grantees, Counterparties and partners. Before entering into contracts with third parties, the Foundation shall verify them in accordance with the Principles and Guidelines and the Counterparty Screening Guidelines. If there are any doubts or additional information on a Counterparty is required, as well as for combating the Legalization (Laundering) of Proceeds of Crime and Terrorist Financing, the Foundation may engage independent third parties for an expert assessment.
- 5.9. In its work, the Foundation is guided by the principles of good faith and confidence in respect of its Counterparties and expects the same from them. The Foundation's Staff Members assume that the documents provided are correct and valid, and the information received from the Counterparties was and remains complete, accurate, not misleading and valid.

6. AVOIDANCE OF THE CONFLICT OF INTEREST

- 6.1. It is essential for us that the Foundation's Staff Members fully understand their responsibility for maintaining a high level of the Foundation's ethical standards and never allow business relations, performance of their duties and decision making to be dependent on their personal interests. We will do our best to promptly and effectively prevent potential Conflict of Interest. Identification of the Conflict of Interest in the Foundation's activities and its Employees is an important way to prevent Corruption and violations, including those related to the Legalization (Laundering) of Proceeds of Crime and Terrorist Financing.
- 6.2. In its most general form, the Conflict of Interest is understood as a situation in which the interests of a Staff Member as an individual conflict with his/her job duties and thus may adversely affect the interests of the Foundation. In general, it may occur in cases where:
- 6.2.1. A close relative of a Staff Member or another person or organization with which the Staff Member and/or his/her close relative has property, corporate or other close relations, participates in a transaction (deal) with the Foundation (grant, donation, goods supply contract, performance of works, provision of services, etc.);
 - 6.2.2. A Staff Member, when performing his/her job or other duties in the Foundation, is also a representative of another organization (founder, employee, Board member, etc.) with which the Foundation has or plans to have business relations (grant, donation, goods supply contract, performance of works, provision of services, etc.);

- 6.2.3. A Staff Member has or intends to have business interests or carries out or intends to carry out activities that do not fall within the scope of the Foundation's activities, which may affect the Foundation's performance due to the amount of time and attention diverted from his/her responsibilities in the Foundation.
- 6.3. When preventing a Conflict of Interest, the Foundation shall rely on good judgement and honesty of the Staff Members and all persons involved in the Foundation's activities. The Foundation promotes a transparency culture in which they disclose timely and completely all Gifts, personal and professional interests or relations of which they are aware and which may lead to a Conflict of Interest (or a potential Conflict of Interest) or otherwise affect their objectivity.
- 6.4. It seems impossible to describe all cases and actions that may result in a Conflict of Interest, so the Code of Ethics describes the most common ones. If it is difficult to determine whether a particular situation leads to a Conflict of Interest, you shall immediately contact the Employee responsible for the personnel management and/or your immediate supervisor. The procedure for notification of an actual or potential Conflict of Interest or any situation that may lead to a Conflict of Interest is contained in the Conflict of Interest Notice.
- 6.5. *Grants and program activities*
- 6.5.1. In order to prevent Conflicts of Interest in the program and grant-related activities, we strictly adhere to the below rules.
- 6.5.2. We are always guided by the Foundation's Articles of Association, strictly follow the approved charity programs, principles and guidelines for granting, regulations on contests and other internal regulations of the Foundation in the program activities, at all stages of grant competitions, when forming the composition of the Experts and the Expert Councils, considering and evaluating the applications, monitoring the implementation of projects.
- 6.5.3. In order to examine applications for the Foundation's grant competitions and for the membership in the Foundation's Expert Councils, external independent Experts shall be involved. In their activities, such Experts shall be guided by the Principles and Guidelines of the Competitions and be subject to the strict requirements for preventing Conflict of Interest and maintaining Confidentiality, in particular, an Expert of a member of the Expert Council shall not be allowed to carry out any assessment if he/she or his/her close relatives:
- are current Beneficiaries, Grantees of the Foundation under any competitions (have an outstanding grant agreement at the time of handling of the applications or are members of the project teams);
 - engage or have engaged during last calendar year in the activities of an organization in which the applicant works or studies, as subscribers, members of a collegial body, chief executive body;
 - are or have been during last calendar year full-time (part-time) employees of the organization in which the applicant works or studies;
 - have or had during the last calendar year contractual relations with organization in which the applicant works or studies;
 - received during the last calendar year funds or other assets or material benefits (i.e. free works and (or) services) from the organization – participant of a competition;
 - are relatives of the applicant;
 - are Applicants in any ongoing competition of the Foundation;

- have other Personal Interest in examining of the applications.
- 6.5.4. In the event of a Conflict of Interest, an Expert and (or) a member of the Expert Council shall notify the Foundation. The application associated with the Conflict of Interest of such member shall be submitted for assessment to another Expert and (or) member of the Expert Council.
- 6.5.5. At the in-person meeting, the member of the Expert Council shall not vote on an application associated with his/her Conflict of Interest.
- 6.5.6. The Expert may not:
- publicly disclose his/her status, including on the Internet, through publications and (or) contacting the applicant and its representatives;
 - discuss the content of the applications and their evaluation with the applicants and (or) their representatives or third parties;
 - use the application content for obtaining their own benefit or otherwise, except for the evaluation.
- 6.5.7. If a Foundation's Staff Member is a member of a body of an organization (including management and supervisory bodies) that is the potential Beneficiary / Grantee of the Foundation, he/she may neither be responsible for managing the grant application nor grant agreement of such organization. A Staff Member who is studying at the university, which is the current or potential Beneficiary of the Foundation, may not be responsible for managing the grant application or grant agreement. Such a Staff Member shall immediately notify his/her immediate supervisor thereof and recuse himself/herself. The Staff Member shall be disqualified from all dealings with such an organization. If the General Director of the Foundation is a member of the collegial body, the approval (signing) of an agreement with the Grantee is subject to written approval by the Foundation Board. If another Foundation's Staff Member is a member of bodies (including management and supervisory bodies) of the organization in question, it shall be properly documented at the stage of managing the grant application, as well as non-participation of such affiliated Staff Member in the negotiations for the provision of a grant by the Foundation to such organization or further grant monitoring.
- 6.5.8. A Foundation's Staff Member may not be a Grant Officer (for handling a grant application) of an organization for which close relatives of such Staff Member are working (as a full-time or part-time employee or under a civil law contract).
- 6.5.9. The grants for implementing projects to be provided to the organizations in which, according to the responsible Program Employee, a close relative of any of the Foundation's Employees is working or will work are subject to prior approval of the Foundation's General Director.
- 6.5.10. The grants for general support (including for the establishment of endowment) to be provided to the organizations which employ, according to the responsible Program Employee, a close relative of any of the Foundation's Employees (or if a close relative of any of the Foundation's Employees has a significant interest in such an organization) may only be approved provided that such employment or interest is disclosed in the appropriate documents at the stage of handling the grant application.
- 6.5.11. The individual grants (including special grants for supporting occupational mobility) and consultations may not be provided to a close relative of a Foundation's Employees. The individual grants and consultations may not be provided to any other relative of the Employee without the prior written consent of the Foundation's General Director.

- 6.5.12. The Foundation's Employees may carry out program activities in the areas in which they have previously worked. However, if an Employee was employed by a Grantee or potential Grantee of the Foundation prior to his/her employment with the Foundation, additional measures shall be taken to prevent even a potential Conflict of Interest. In such cases, the Employee shall disclose the existing relations in full, analyze possible risks and consequences with the immediate supervisor. The Foundation shall take steps to eliminate the Conflict of Interest with such organization.
- 6.5.13. The former Employee may not be a project manager of the Foundation's Grantee for two years after the end of service with the Foundation.
- 6.5.14. The grants may be provided to the organizations in which the General Director is engaged as a member of a collegial body are subject to the approval of the Foundation Board.

6.6. *Relations with contractors and suppliers of services and goods*

- 6.6.1. In selecting Foundations counterparties and concluding contracts with them (supply of goods, performance of work, provision of services, etc.) in order to comply with the requirements order to comply with the laws, including the laws on combating the Legalization (Laundering) of Proceeds of Crime, Terrorist Financing and financing of proliferation of weapons of mass destruction, responsible Foundation's Employees shall implement a procedure for identifying and verifying the integrity of each Counterparty in accordance with the Principles and Guidelines and the Counterparty Screening Guidelines.
- 6.6.2. The Employees shall notify their immediate supervisor of their Personal Interest in any supplier of goods and services to the Foundation. They may not be involved in the relations with such a supplier. Personal Interest means a financial or any other interest of an Employee or his/her close relative that may influence the Employee's judgments in the performance of his/her job duties. If a university acts as a contractor, an Employee studying at such university may not be responsible for maintaining a contract with such a contractor. The Employee shall disclose the fact of his/her studying at the university and shall be disqualified from dealings with such an organization.
- 6.6.3. The following requirements shall apply to the Foundation's transactions with persons and organizations to which the members of the Foundation Board, Supervisory Board, Council for the Endowment Use and General Director relate (within the meaning of Article 27 of Federal Law No. 7-FZ On Non-Profit Organizations dated January 12, 1996):
- the stakeholders which are the members of the Foundation Board, and/or Supervisory Board, and/or Council for the Endowment Use, and/or the General Director, shall inform the Foundation Board of their interest before the decision to enter into a transaction is made;
 - the Foundation Board (Article 27 of Federal Law No. 7-FZ On Non-Profit Organizations dated January 12, 1996) shall approve a transaction.
- 6.6.4. A related party transaction performed in violation of the requirements may be declared invalid by the court. A stakeholder shall bear liability to the Foundation for losses inflicted to the Foundation. If several stakeholders inflict the losses to the Foundation, their liability to the Foundation shall be joint and several.
- 6.6.5. The former Employee may not be a contractor's representative in the business negotiations with the Foundation for two years after the end of service in the Foundation.

6.7. *Business gifts and hospitality*

- 6.7.1. Our general rule is that the Foundation does not approve the acceptance of Gifts by the Staff Members and/or their close relatives in order to avoid the impression that such Gifts

may influence the decisions made by the Foundation. The Staff Members shall consider all gifts received from the persons and organizations, which have or may have business relations with them in accordance with the Code of Ethics and, in such a case, the Staff Members shall be considered as representatives of the Foundation. The Staff Members are advised to inform such persons and organizations of the rules for non-acceptance of Gifts timely and expressly. The Staff Members shall not gift (transfer) anything of value if it could be perceived as undue influence.

- 6.7.2. The Foundation's Staff Members may give or receive Gifts of a reasonable value (as well as incur certain Hospitality Expenses), if such actions may not be considered as an incitement to make a decision for the benefit of the giver and/or person that finances participation in certain events, in exchange for the information, favorable attitude or opportunities for the Foundation, which would not otherwise be provided. Gifts as well as reimbursement of Hospitality Expenses incurred by the Foundation's Staff Members, Counterparties and other persons shall not in any way affect the ability of such persons to make impartial and fair business decisions.
- 6.7.3. In the interaction with the Public Officials, it is necessary to be guided by the regulations establishing the ethical standards and rules of conduct of the Public Officials.
- 6.7.4. The Foundation may give and receive symbolic Gifts that are inherent in the usual business practices and comply with the requirements of the applicable laws. The Gifts which the Staff Members may give on behalf of the Foundation to other persons or receive on behalf of the Foundation in connection with their employment, as well as business entertainment and Hospitality Expenses shall:
- be directly related to the statutory purposes of the Foundation or to commemorative dates, anniversaries, national and professional holidays, etc.;
 - be reasonable and adequate, and not luxury items;
 - not compromise the ability of the recipient to make impartial and fair decisions in connection with the official powers and duties assigned to him/her, in particular, but not limited to, shall not be provided in exchange for the information, preferential treatment or opportunities that would not have otherwise been provided;
 - not constitute a hidden remuneration for a service, action, inaction, connivance, protection, provision of rights, making of a particular decision regarding a transaction, agreement, approval, etc. or an attempt to influence the recipient for other illegal or unethical purpose;
 - create no reputational risk for the Foundation, Staff Members and other parties if the information of such Gifts and expenses is disclosed;
 - not be prohibited by the laws, procedures and policies applicable to the giver or recipient;
 - not impose any moral obligation on the recipient;
 - comply with the generally accepted standards of morality, applicable laws, principles and requirements of the Anticorruption Policy and other local regulations of the Foundation governing the prevention and suppression of Corruption and violations, including those related to the Legalization (Laundering) of Proceeds of Crime and Terrorist Financing;

- complete the required approval (notification) procedures established in the Foundation, be approved by the higher manager of the Staff Member, which shall be properly documented.
- 6.7.5. It is not allowed to give and receive Gifts on behalf of the Foundation and its Staff Members in the form of cash and non-cash funds, regardless of the currency, as well as securities.
- 6.7.6. The Hospitality Expenses shall not be incurred by the Foundation's Staff Members in the form of a direct delivery of cash to third parties or wire transfers to their bank accounts.
- 6.7.7. All expenses on the Gifts shall be correctly and accurately recorded in the expense reports and recognized in the accounting records of the Foundation.
- 6.7.8. If there are any doubts about the legality or ethicality of their actions, the Foundation's Staff Members shall inform the Foundation / Employee responsible for the personnel management, consult with him/her before giving (receiving) a Gift, providing business entertainment or participating (arranging for the participation) in certain events with reimbursement of the expenses.
- 6.7.9. If a Staff Member receives a Gift on behalf of the Foundation, he/she shall notify the Employee responsible for the personnel management thereof within five (5) business days.
- 6.7.10. A Foundation's Staff Member that is offered Gifts or other remuneration (both directly and indirectly) in the performance of his/her employment duties which may influence his/her decisions or actions (inaction), shall:
- refuse to accept them and immediately notify the Foundation / Employee responsible for the personnel management of the Gift offering;
 - exclude, as far as possible, further contacts with the person who offered a Gift or remuneration, unless it is a part of his/her duties;
 - if a Gift may not be refused or returned, transfer the Gift with an appropriate office memorandum to the Employee responsible for the personnel management, and (or) continue working on the issue to which the Gift relates in accordance with the procedure established in the Foundation.
- 6.7.11. Failure to comply with these requirements may be a reason for applying disciplinary, civil, administrative or criminal measures to the Foundation's Staff Member.
- 6.8. *Working outside the Foundation, teaching and consulting*
- 6.8.1. Since it is possible that part-time employment in another organization, provision of consultations on a reimbursable basis or teaching may interfere with the performance of the Employee's job duties and/or result in a real or potential Conflict of Interest, Employees are usually not employed in such a manner, especially by the Grantees or suppliers of the Foundation. Employees shall notify the Foundation of their intentions to carry out pedagogical and scientific activities or of carrying out such activities.
- 6.8.2. The exceptions are subject to a prior written consent of the General Director in the following cases, if such employment:
- interferes with the performance by an Employee of his/her job duties in the Foundation, such as trips and attendance at the program events that may be held beyond the normal working hours;

- influences or creates an opportunity for such influence upon the opinion and judgment of an Employee performing his/her job duties and acting on behalf of the Foundation.

6.9. *Participation as subscribers or members of management bodies of other organizations, external expert and (or) public councils*

6.9.1. The Employees who are invited to participate, in their personal capacity (and not at the Foundation's request), in the activities of other organizations as subscribers or members of the collegial or executive bodies, public and (or) expert councils, may only accept such invitations with the prior written consent of their immediate supervisor and the Foundation's General Director and, in respect of the Foundation's General Director - with the consent of the Foundation Board.

6.9.2. If an Employee receives an invitation to join an expert or public council under a public authority, local government, organization or institution, he/she shall notify the General Director, in respect of the Foundation's General Director - with the consent of the Foundation Board.

6.9.3. The factors that should be taken into account when considering such invitations include:

- potential Conflict of Interest (e.g., whether the organization is a Beneficiary, Grantee or a supplier of the Foundation or may become one);
- whether the additional load arising from such role may affect the Employee's ability to perform his/her major duties;
- whether there is a close connection with the Employee's work in the Foundation or occupational training;
- what such membership may give an Employee and the Foundation in professional terms;
- whether there is a possibility that the organization may erroneously perceive such relations as improving the chances of financing by the Foundation.

6.9.4. Once an Employee's request for the membership in other organizations is approved (in respect of non-profit organizations), he/she may attend their meetings and perform his/her duties during only non-working hours. The Foundation's policy on remuneration and reimbursement for the work performed outside the Foundation is set out below.

6.10. *Public speaking and publications*

6.10.1. We adhere to the clear rules in respect of public speaking and publications.

6.10.2. If they relate to our operation, we prepare them together and in accordance with the recommendations of the Foundation's unit responsible for the strategic communications. All interviews or comments on behalf of the Foundation shall be approved in advance by the General Director and the Foundation's unit responsible for the strategic communications. The interviews shall be usually granted by the General Director and/or program directors.

6.10.3. The Staff Members may not give comments on the Founder's remarks, as well as they may not give comments on his/her behalf.

6.10.4. The General Director shall agree with the Foundation Board the public positions of the Foundation (e.g., execution of significant contracts on behalf of the Foundation).

- 6.10.5. We also have established rules in respect of public speaking and publications that are not relevant to our work in the Foundation.
- 6.10.6. The Staff Members are advised to maintain their professional qualifications (e.g., a grant management specialist, sociologist, a political scientist, lawyer, economist, personnel management specialist, etc.) and reputation in their professional area by making public presentations, giving lectures, etc., and writing articles on topics related to their professional interest, provided that such activities do not affect the performance of their major duties. In relation to Employees, such activities must be agreed upon with the immediate supervisors.
- 6.10.7. In cases where a Staff Member's presentation may be perceived as a statement of position on behalf of the Foundation or if a Staff Member's presentation or article is associated with his/her professional interest, but is intended for a large audience, for example, if a Staff Member writes an article for a periodical or speaks in the media, it is necessary to contact the Foundation's unit responsible for the strategic communications. The Staff Members are offered to send copies of speeches, articles and publications to the Foundation's unit responsible for the strategic communications prior to the publication or presentation.
- 6.10.8. The Staff Members writing articles and speaking on their own behalf and not on behalf of the Foundation shall make it clear. Whenever a Staff Member engages in any activity that does not relate to the Foundation, at his/her individual initiative and it becomes known in the course of such activities that he/she works in the Foundation, the Staff Member shall make it clear, if necessary, that he/she is engaged in such activities in his/her personal capacity.
- 6.10.9. The Staff Members of the Foundation shall adhere to the highest ethical standards in their activities, respect their colleagues and the Founder of the Foundation and, therefore, avoid any statements, speeches or dissemination of the information in any other form, if it may cause damage to the reputation of the Foundation, its Founder and Subscribers. Any confidential information related to the Foundation, its Founder and Subscribers is prohibited to be used in any public statements and speeches.
- 6.11. *Receipt of payment for the membership of other organizations, speeches and publications, as well as reimbursement of the related expenses*
- 6.11.1. The Foundation's Employees may receive remuneration and be reimbursed for the expenses from persons and organizations that are not the Beneficiaries and Grantees of the Foundation, for the above activities, i.e. as subscribers, members of collegial and executive bodies, public and expert councils, public speeches, publications.
- The expenses, including travel expenses, may be reimbursed by the Foundation only if they are incurred as part of the performance by an Employee of his/her duty assignment on behalf of the Foundation's management.
- Remuneration and reimbursement of expenses by Employees, including travel allowances, from Beneficiaries and Grant Recipients is unacceptable.
- 6.12. *Academic degrees and honorary titles of higher educational institutions*
- 6.12.1. We support the professional development of the Foundation's Employees, including education in a distant and online format under the further vocational education programs, master's and postgraduate programs, as well as research for the degrees of a candidate and a doctor of sciences, if such activity is carried out in the Employee's free time and does not interfere with the effective performance of his/her duties. When choosing a program and educational institution, it is necessary to take into account the existence of a real and potential Conflict of Interest, that is, whether the educational institution is (will be) a Beneficiary, Grantee or Counterparty of the Foundation.

6.12.2. For the purposes of further vocational education programs, master's and postgraduate programs, as well as research for the degrees of a candidate and a doctor of sciences the Employee shall obtain a prior approval of his/her immediate supervisor and the Foundation's General Director, and the General Director shall obtain an approval of the Foundation Board.

6.12.3. The Employee may not receive an honorable title of the higher educational institution participating in the Foundation's programs without the prior written consent of the Foundation's General Director, and the General Director without the approval of the Foundation Board.

7. CONFIDENTIALITY AND DISCLOSURE

7.1. The personal data of the Foundation's Staff Members and Counterparties, identity information of the Experts and content of their expert opinions are confidential and may not be disclosed by the Foundation's Staff Members, except for the cases established by the laws and for the information that is disclosed by the Foundation in accordance with this Code of Ethics. The persons shall access the information and documents containing confidential information in compliance with a reasonable sufficiency principle and if only a Confidentiality Agreement is signed. The Staff Members and Counterparties shall only have access to the information that is required directly for their activities. The Staff Members, which have access to the confidential information, shall only use it for the performance of their duties in strict compliance with the requirements established by the laws. The Foundation's Staff Members, except for the cases established by the laws or Foundation's internal regulations, may not disclose the confidential information. The Foundation's Staff Members shall not disseminate information that may damage the reputation of the Foundation, its Founder and Subscribers, and shall prevent the dissemination of such information to the extent possible and within the scope of the applicable laws.

7.2. The Foundation shall ensure the secure storage and confidentiality of the personal data of the Founder, Staff Members, Beneficiaries, Grantees, Counterparties and other third parties with which it works. The Foundation shall only use the personal data of the Founder, Staff Members, Beneficiaries, Grantees, Counterparties and other third parties in public with their personal permission and in accordance with the legal requirements and the Personal Data Processing Regulation.

7.3. The Foundation reserves the right to process the personal data of the Staff Members available in the Foundation's information systems, including the Staff Members' emails, as well as on the technical devices provided to the Foundation's Staff Members for the performance of their job duties, for monitoring of the Staff Members' compliance with the requirements of the applicable laws, other regulations, internal policies and acts adopted by the Foundation, as well as prevention of violation thereof. Therefore, each of the Foundation's Staff Members agrees and understands that access to his/her official correspondence, as well as information available on the technical devices provided to the Foundation's Staff Members for the performance of their job duties, may be provided to other Foundation's Staff Members and law enforcement and other regulatory authorities. The personal data of a Foundation's Staff Member shall be processed with his/her written consent.

7.4. The information required to be disclosed in accordance with the legal requirements shall be disclosed within the time limits established by the laws.

7.5. The Foundation is aware of its responsibility to the public, including individuals and organizations directly affected by our activities, and considers itself accountable to the public for its actions. In addition to the information required to be provided and disclosed, the Foundation shall also disclose the information on its activities on its website and via social media.

8. COMPLIANCE WITH LEGAL REQUIREMENTS AND OFFICIAL GUIDELINES

- 8.1. The Foundation shall operate in accordance with the Constitution of the Russian Federation, the Civil Code of the Russian Federation, Federal Law No. 7-FZ On Non-Profit Organizations dated January 12, 1996, Federal Law No. 135-FZ On Charitable Activities and Volunteering dated August 11, 1995, Federal Law No. 275-FZ On the Procedure for Establishment and Use of Endowment by Non-Profit Organizations dated December 20, 2006, and other legislative acts of the Russian Federation.
- 8.2. The Foundation shall comply with the applicable international laws, international standards and recommendations, including in the field of combating Corruption and Legalization (Laundering) of Proceeds of Crime and Terrorist Financing, take into account and implement the best practices applicable in the area of non-profit organizations.

9. FINANCIAL INFORMATION AND REPORTING STANDARDS

- 9.1. In its activities, the Foundation approves the budget (annual financial plan), maintains financial and accounting in full compliance with the requirements of the Russian legislation, in particular, maintain separate records of income and expenses related to the primary statutory activities of the Foundation and income-generating activities, documents the expenses for the actions taken, generates reporting, audits the accounting records in the cases established by the laws.
- 9.2. The Foundation shall apply the funds in accordance with the stated goals and under the terms of disbursement. The Foundation shall disclose the information concerning the implementation of programs, competitions and projects supported by the Foundation.
- 9.3. We know how important it is to comply with the requirements to the financial reporting, and we strive to be guided by the up-to-date standards establishing high performance standards. When preparing financial documentation, the Foundation always takes into account standards and requirements and applies best practices to make the Foundation's activities fully transparent.
- 9.4. We also comply with the requirements and requests of the competent authorities and follow all established financial reporting procedures, including the requirements of the laws on combating the Legalization (Laundering) of Proceeds of Crime, Terrorist Financing and financing of proliferation of weapons of mass destruction, provide assistance and furnish the requested information in accordance with the applicable laws. In particular, we implement a procedure for identifying and verifying the integrity of the Counterparties in accordance with the Principles and Guidelines and the Counterparty Screening Guidelines in order to comply with the above laws. In the course of this work, we take into account their reputation, while using publicly available information. It is important for us to establish sustainable relations with our Counterparties based on integrity, transparency and mutual confidence.
- 9.5. The Foundation shall be accountable to the public authorities for its financial activities. We strive to ensure transparency and provide complete and reliable information.
- 9.6. The Foundation's reporting shall be submitted to the competent authorities in accordance with the procedure established by the laws and made public on Internet, including on official federal resources and on the Foundation's website.

10. NON-INVOLVEMENT IN POLITICAL ACTIVITIES

- 10.1. In accordance with the Russian legislation, the Foundation may not disburse its funds and use its assets for the purposes of political activities, as well as to support political parties, movements, groups and campaigns. We do not provide financial or any other support for political activities, including political propaganda, publication and dissemination of statements, political and/or election campaigns, election canvassing, referenda and referendum campaigning, and we do not take any other actions to influence the results of the election campaigns, referenda and elections. The Foundation cannot participate in political activities, either directly or indirectly, including, through the provision of grants, donations, concluding agreements for the provision of services, provision of non-material support, etc.

- 10.2. The Staff Members are prohibited from supporting any political activities or engaging in any political activities on behalf of the Foundation. The third parties with which the Foundation has business relations (Beneficiaries, Grantees, Counterparties, partners, Experts and other persons acting on behalf of the Foundation) shall not in any case carry out political activities on behalf of the Foundation or by using Foundations assets.
- 10.3. The Foundation respects the personal religious commitments and political preferences of its Staff Members, if they are within the scope of the Russian legislation. The Staff Members understand that their religious commitments and political preferences shall not adversely affect the performance of their job duties and business communication with their colleagues and third parties. Any participation in political, religious and public activities of the Staff Members is allowed in their individual capacity.
- 10.4. When deciding on participation in political activities, the Staff Members shall take into account public perception and the risk that certain actions of a Staff Member may be considered to be performed on behalf of the Foundation. Therefore, it is important that Staff Members perform any actions in such a manner as to maintain public confidence in the Foundation as a charitable organization that does not support or engage in any political activities.
- 10.5. In order to achieve this goal, the following mandatory regulations shall be followed:
- 10.5.1. The Foundation's Employees may not participate in any political activities during the working hours.
- 10.5.2. The Foundation's Staff Members may not use the Foundation's resources or funds in connection with their personal engagement in the political activities. The work computers, corporate emails, smartphones and tablets, photographic copying, postal and telephone services, stationery and Foundation's premises are prohibited to be used for such purposes.
- 10.6. The Staff Members who participate as individuals in public political and social events shall pay particular attention to non-reference to the Foundation's name in any related publications, public statements, public audio and video information and other public materials. Therefore, it is important that the Staff Members present themselves solely as individuals and not as the Foundation's Staff Members when participating in such events. Where there is or may be a reference to the Staff Member's affiliation with the Foundation, such Staff Member shall make an express statement that he/she is engaged in such activities in his/her personal capacity and is not acting as a representative of the Foundation.

11. INTERACTION WITH PUBLIC OFFICIALS

- 11.1. We strive to develop partnership and cooperation, including with the state organizations and institutions, public authorities and local governments based on the legality and confidence for effectively addressing socially significant issues and making sustainable social changes primarily in the field of culture, education, social sports, support and development of the non-profit sector, development of a culture of giving.
- 11.2. In our interaction with Public Officials, we pay particular attention to the stringent standards and requirements imposed in this regard by the laws. Our general rule is that the Public Officials may not be applicants and participants in the competitions in accordance with the Foundation's Principles and Guidelines of the Competitions. The Foundation shall not hire or offer employment to a Public Official within the period of his/her public service, pay or reimburse his/her travel expenses, enter into service contracts and pay for the services, provide grants. We may not also offer Gifts to Public Officials.
- 11.3. We shall not provide or offer, whether directly or indirectly, anything of value to a Public Official with the intention of influencing such Public Official, obtaining or retaining an advantage in the activities and/or facilitating actions taken or decisions made by the Public Official. This also applies to third parties with which the Foundation has business relations.

12. ANTICORRUPTION COMPLIANCE AND INADMISSIBILITY OF ILLEGAL ACTIONS RELATED TO THE LEGALIZATION (LAUNDERING) OF PROCEEDS OF CRIME AND TERRORIST FINANCING

- 12.1. One of the most important conditions for the Foundation's operation is strict compliance with the laws governing, among other things, the issues related to combating Corruption and violations related to the Legalization (Laundering) of Proceeds of Crime and Terrorist Financing. In this regard, the Foundation declares its visceral opposition to unfair and illegal activities and voluntarily assumes obligations relating to the prevention of Corruption and other violations specified in the Anticorruption Policy.

13. COMPLIANCE WITH THE CODE OF ETHICS AND WHISTLEBLOWING

- 13.1. The high ethical standards and strict compliance with the Code of Ethics are one of the main priorities and responsibilities of each Foundation's Staff Member. The Foundation's Staff Members shall assist in the investigation of violations of the Code of Ethics, provide necessary explanations and materials required for the inspection.
- 13.2. The Code of Ethics applies to all Employees, members of the Foundation Board, Supervisory Board, Council for the Endowment Use, Experts, Expert Councils, Beneficiaries, Grantees, Counterparties, partners and other persons involved in the Foundation's activities. In witness whereof, the mentioned persons have signed a Consent to Acceptance of and Compliance with the Principles and Guidelines for Conducting Charitable Activities and Risk Management and the Anticorruption Policy of the Foundation.
- 13.3. The Ethics Committee is responsible for ensuring the compliance with the requirements and provisions of the Code of Ethics. The powers of the Ethics Commission, its composition and operating procedures shall be governed by the Regulation on the Ethics Commission, approved by the General Director of the Foundation.
- 13.4. The Foundation's Staff Members guilty of violation of this Code of Ethics may be held liable in accordance with the procedure and on the grounds provided for by the Russian legislation and Foundations internal regulations. The failure to comply with and violation of the principles of the Code of Ethics may be treated as an action inconsistent with the status of a Foundation's Staff Member.

14. REVISION AND AMENDMENTS

- 14.1. The Foundation regularly, but at least once a year, evaluates the Code of Ethics for compliance with the current legislation. Subject to the changes in the laws of the Russian Federation and applicable standards and best practices, the Code of Ethics may be amended as necessary. The Code of Ethics shall be amended in the same manner as it is adopted.
- 14.2. Certain aspects of the Code of Ethics may be specified through the development of other local regulations of the Foundation.
- 14.3. For all other issues not regulated by the Code of Ethics, the provisions of applicable legislation and internal regulations of the Foundation shall guide one.