

Business ethics and anti-corruption

Key documents

Magnit's policies and documents

- ▶ Business Ethics Code of Magnit
- ▶ Anti-Bribery and Corruption Policy
- ▶ Regulations on the Anti-Corruption Hotline of the Anti-Bribery and Corruption Policy of Magnit
- ▶ Contractual Policy of Magnit
- ▶ Internal Control and Risk Management Policy of Magnit
- ▶ Anti-corruption clause of the Anti-Bribery and Corruption Policy of Magnit
- ▶ Regulations on Trade Secret of Magnit
- ▶ Regulations on Internal Checks of Magnit
- ▶ Internal Workplace Regulations of Magnit
- ▶ Tendering Policy of Magnit
- ▶ Regulations on Counterparty Due Diligence



External documents

- ▶ Criminal Code of the Russian Federation No. 63-FZ dated 13 June 1996
- ▶ Administrative Offence Code of the Russian Federation No. 195-FZ dated 30 December 2001
- ▶ Federal Law No. 273-FZ On Combating Corruption dated 25 December 2008
- ▶ Guidelines for the Development and Adoption of Measures by Organisations to Prevent and Combat Corruption (Decree of the President of the Russian Federation No. 309 On Measures Supporting the Implementation of Selected Provisions of the Federal Law On Combating Corruption dated 2 April 2013)
- ▶ Federal Law No. 152-FZ On Personal Data dated 27 July 2006
- ▶ Federal Law No. 149-FZ On Information, Information Technologies and Information Protection dated 27 July 2006

Our approach to management

Magnit maintains high legal, ethical and moral standards as part of our business activities and cooperation with business partners. These standards are set out in Magnit's Business Ethics Code, which is grounded in best Russian and international business conduct practices, corporate governance and relationships with employees and other stakeholders.

Healthy human relations are at the core of every company, especially in the retail industry. The actions and

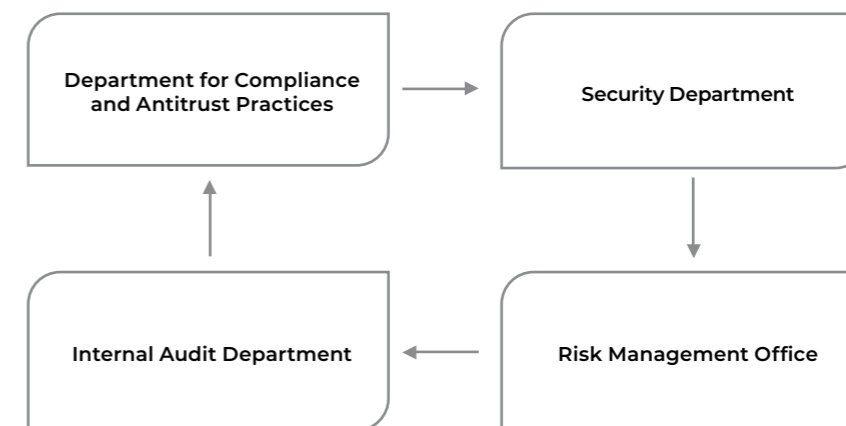
decisions of any of our employees build and strengthen the Company's overall reputation. We seek to ensure that all our hires make honest and appropriate decisions based on the principles set out in the Code and follow guidance that will enable us to meet the highest standards of business ethics.

Our zero-tolerance approach to corruption in all its forms provides the basis for the Anti-Bribery and Corruption Policy, which underpins our corruption risk management

system and our corruption prevention tools. Magnit's managers and employees should avoid being affected by any influences, interests, or relations that may harm the Company's business or facilitate any corrupt practices.

All new employees are required to attend courses on business ethics, information security and Anti-Bribery and Corruption Policy, with refresher courses provided every three years.

Cross-functional model for combating corruption



→ Cooperation and coordination as part of anti-corruption activities, advisory support, training, risk assessment, and controls