

**Anti-Corruption Policy
of Sberbank**

Moscow
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1. General Provisions

1.1. This Policy sets out the main goals, objectives and principles of anti-corruption system functioning at Sberbank (hereinafter referred to as “Bank”) and the main approaches for application within Sberbank Group (hereinafter referred to as “Group”).

1.2. The Policy is part of the compliance risk management system and establishes the administrative and organizational framework for preventing the corruption (acts of corruption), measures to minimize and/or eliminate the consequences of corruption offenses, its participants, tasks, functions, powers and responsibilities, including those in relations with third parties including individuals, legal entities, state and municipal authorities and their representatives.

1.3. The Policy complies with the provisions of the Russian and international legislation, as well as the methodology, principles and best practices.

1.4. The Bank expects its employees, regardless of their position in the Bank and/or a Group Member to agree with the certain ethical principles, including those stipulated in the Code of Corporate Ethics of Sberbank, approaches and requirements hereof subject to the assumptions and restrictions prescribed by Section 6 hereof.

The Bank and its employees shall not be entitled to evade fulfilling the requirements of this Policy by engaging the counterparties, including consultants, agents or other third parties, in performing the actions that violate the provisions of this Policy.

1.5. The Policy shall serve as a basis for the development of internal regulatory documents (IRD) on anti-corruption activities of the Bank and the Group Members.

2. Aims and objectives of the anti-corruption system

2.1. This Policy is designed to identify, prevent and minimize the cases of unlawful, unethical and corrupt behavior of Bank employees. This Policy is aimed at forming a uniform understanding among all employees and Heads of the Bank of the essence of corruption actions, their forms and manifestations, in order to prevent and suppress the situations and actions that may potentially violate the requirements of Russian anti-corruption legislation and other applicable norms of international law.

2.2. Key objectives of the anti-corruption system of the Bank include the following:

- establishment of anti-corruption principles and rules for the Bank;
- creation of effective mechanisms, procedures, control and other measures aimed at combating the corruption and minimizing the risks of involving the Bank/Group members, as well as their employees, in corruption activities;
- formation of ethical behavior principles and intolerance to all the manifestations of corruption, including a unified standard of anti-corruption behavior among Bank employees;
- integration of anti-corruption principles into strategic and operational management at all levels of the Bank's activities;
- formation of common understanding of this Policy' principles by employees, customers, counterparties, shareholders, investors and other entities of the Bank;
- informing the management bodies of the Bank of the corruption offenses and anti-corruption measures undertaken;
- application of responsibility measures for the corruption offense.

3. Corruption practices

3.1. According to the Russian anti-corruption legislation, anti-corruption regulatory acts and practices of foreign states, and for the purposes of this Policy, corruption practices shall mean the practices referred to in cl. 3.2 herein, committed:

- in relation to the Bank or on behalf of or in the interests of the Bank in relation to third parties, including relations with state and municipal authorities and their officials, the Bank of Russia and their officials, other legal entities and their employees, management bodies and representatives of the above legal entities;
- directly or indirectly;
- personally or via third parties;
- regardless of the goal, including the simplification of administrative, bureaucratic and other formalities and procedures, securing competitive or other benefits, associated with corruption practices;
- in any form, including giving / taking monetary funds, values, other assets or monetized services, other property interests.

3.2. Corruption practices committed for the purposes, in the manner or procedure stated in cl. 3.1 herein, include the following:

- giving bribes or bribery mediation, that is, providing or promising to provide any financial or another benefit / advantage with the intent to encourage any person to unduly fulfill his or her job obligations, that is, on more favorable terms for the giver and/or in violation of the procedures and practices prescribed by the Russian Federation legislation and/or IRDs of the Bank;
- taking bribes or bribery mediation, that is, taking or agreeing to take any financial or another benefit / advantage for the unduly fulfillment of his or her job obligations, that is, on more favorable terms for the giver and/or in violation of the procedures and practices prescribed by the Russian Federation legislation and/or IRDs of the Bank;
- corrupt payment, that is, illegal transfer to an officer fulfilling managerial functions in the Bank, monetary funds, shares, other assets, rendering monetized services to him or her, providing other property interests for committing / omitting to commit actions in the interests of the giver in relations to the job position occupied by the officer;
- bribing state officers, that is, providing or promising to provide to a state officer any another benefit / advantage with the intent to impact on the performance of his or her obligations to receive / retain business or secure competitive or other benefit for the Bank;
- usage by members of the managerial bodies, employees of the Bank for their own benefit or the benefit of third parties' opportunities related to their official position and/or job obligations to derive financial or other benefits / advantages not stipulated by the Russian Federation legislation and/or IRDs of the Bank;
- other illegal use of his or her official position against the legal interests of the Bank, society, state to derive financial or other benefits / advantages.

3.3. Employees of the Bank are prohibited from performing any of the actions specified in clause 3.2. of this Policy.

4. Main anti-corruption measures and counteracting corruption activities

Corruption management involves the activities of managerial bodies, employees of the Bank within their powers, related to the following:

- formation of intolerance to corrupt manifestations in any form;
- formation of corporate and social responsibility in the field of corruption combating;
- prevention of corruption offenses;
- fighting corruption — identification, prevention, restraint, disclosure and investigation of corruption offenses;
- mitigation and/or remediation of the consequences of corruption offenses.
- prosecution of those who committed corruption offenses.

To efficiently identify, assess and mitigate corruption risks in the Bank, the following approaches shall be used:

- obtaining the declared information on incomes, expenses, property and property obligations of certain categories of persons, their spouses and minor children. The above information shall be deemed confidential unless otherwise is stipulated by the Russian legislation or national legislation of a Group Member;
- applying relevant legally imposed and/or stipulated by labor agreements requirements to the officials of the Bank and the candidates to executive positions;
- assessing and processing any incoming information on intentions and facts of corruption offenses or any cases of inducing employees to commit a corruption offense;
- establishing the rules for handling gifts and hospitality expenses;
- establishing the procedure for disclosing information and assessing so that to prevent conflicts of interest, including potential ones;
- maintaining full and credible records and documenting all payments performed by the Bank;
- establishing procedures for assessing, analyzing and selecting counterparties of the Bank, as well as rules for interaction with them;
- conducting an anti-corruption experts review of internal policies, and organizational/management documents of the Bank and agreements to be concluded.
- bringing the rules and requirements of this Policy to the attention of all employees of the Bank;
- compulsory training with subsequent testing of employees for knowledge and understanding of the main provisions of this Policy in the field of anti-corruption;
- prosecution of those who committed corruption offenses;
- openness and publicity of the Bank's activities (subject to restrictions related to the dissemination of confidential information).

Heads of independent structural business units of the Bank while assessing, encouraging and moving an Employee take note of information about a long, impeccable and efficient performance of that Employee's duties, taking into account the anti-corruption requirements set by the Bank, as well as the conscientious execution of other compliance and ethical procedures by them.

4.1. Arrangement of "Compliance Hotline"

"Compliance Hotline" - is a secure and confidential information channel designed to provide employees and other third parties, including clients and counterparties, with information about intentions or facts of corrupt practices against the Bank and/or its employees, clients, counterparties, allowing, inter alia, the transfer of information anonymously.

Any employee shall notify the Compliance Division Hot Line of the Bank of any information or suspicions of potential corruption actions or omissions to act by other employees, counterparties or other entities interacting with the Bank.

The Bank guarantees the observance of the confidentiality principle in respect of all the applicants, and that, in respect of the information provided, verification will be carried out within the timing established by the Bank and the employee will not be sanctioned (dismissed, demoted, deprived of premiums, etc.) if he/she reported the alleged fact of corruption, including, if the facts indicated in the message were not confirmed during their verification. However, should the notification be made with ill intentions as deliberately false, for example, to smear someone or derive any preferences or avoid responsibility, enforcement actions shall be applied to the employee according to this Policy and applicable legislation.

The Bank provides the following information channels:

- Telephone +7 (495) 665-86-09;
- e-mail ethics@sberbank.ru;
- web-site: http://www.sberbank.ru/ru/person/dist_services/warning/uvb_

4.2. Anti-corruption measures in relations with counterparties

Requirements of this Policy shall be taken into account when the Bank enters into contractual or other business relations with individuals and legal entities. The Bank shall expect from counterparties, representatives of the Bank, members of their managerial bodies and employees as well as from other entities to comply with the relevant anti-corruption obligations stipulated by the agreements they conclude with the Bank, their internal policies, or which are directly stipulated by the applicable legislation, national legislation of the country of registration and/or carrying out activities of the above entities and provisions of the international law.

The Bank makes reasonable and affordable efforts in the circumstances to mitigate the risk of breach of the applicable anti-corruption legislation while establishing business relationships with customers and counterparties that have been or may be involved in corrupt activities. In this regard, the Bank:

- reviews the business reputation of potential counterparties, their shareholders and beneficial owners in accordance with the procedure established by the Bank, including for the tolerance to corruption, as well as the availability of regulations and procedures in the field of corruption combating;
- informs potential counterparts about the principles and requirements of the Bank in the field of anti-corruption set forth in this Policy, as well as by including the relevant anti-corruption clauses into the agreements / contracts concluded by the Bank with these persons, and by posting information on the external website of the Bank, in the Compliance section;
- takes into account the willingness of potential counterparties to comply with the principles and requirements in the field of combating corruption, and to provide mutual assistance to prevent corruption offenses in their activities.

The Bank has banned the possibility of attracting customers, counterparties and other third parties to commit acts that could be regarded as unlawful.

4.3. Notifications of hiring former state and municipal officers

According to the Russian legislation, should a labor agreement (civil law contract) be concluded with an individual who has previously occupied any state or municipal positions during two years after their leaving of the state or municipal position, the business unit responsible for formalizing the employment relationship shall notify the individual's previous employer / its representative of the hiring. For the purposes of this Policy, the above requirement shall apply to the former employees of the Central Bank of the Russian Federation.

4.4. Conflicts of interest

Conflict of interest within this Policy means a direct or indirect contradiction between the property and other interests of the Bank and / or their employees and / or one or more clients and / or counterparties, as a result of which the actions (omission to act) of one party may have adverse consequences for the other party, which may also arise in the joint work of Relatives in the Bank and / or the participation of employees, their Relatives in the authorized capitals and management bodies of third parties, or the combination of other paid activities by employees not within the Bank. Conflicts arising in the course of negotiations on commercial terms in the ordinary course of business and contradictions between the Bank's business units are not considered a conflict of interest for the purposes of this Policy.

Conflict of interest arises in a situation where the personal interest (direct or indirect) of the employee of the Bank influences or can affect the objective and impartial performance of his official duties, which may harm the rights and legitimate interests of the Bank, of the Group member, third parties or the state.

Vested interest of an employee which impacts or may impact on duly exercising of his or her official duties shall mean the possibility to obtain by him or her from third parties in the course of performing his or her official duties benefits in the form of monetary finds, values, other assets or monetized services, other property interests for himself / herself or third parties.

In order to avoid, prevent and resolve conflicts of interest, the Bank's employees are required to:

- disclose information about a conflict of interest or the likelihood of its occurrence, as soon as it becomes aware of it in accordance with the procedures and internal regulatory documents established by the Bank;
- undertake measures to prevent any possibility that gives rise to a conflict of interests;
- minimize the risk of conflicts of interest in the performance of their functional duties.

Prevention or resolution of a conflict of interests may involve the changing of the range of tasks and specific errands performed under official duties by the employee who is a party to the conflict of interests, and/or his or her rejection of the benefit which has given rise to the conflict of interests (for example, rejecting to cooperate with specific customers or counterparties of the Bank, rejecting to participate in a deal process, etc.) In some cases, prevention or settlement of a conflict of interest may involve change of a job title or official position of an employee of the Bank, who is a party to a conflict of interest according to the procedure established by the effective legislation of the Russian Federation or the national legislation of a Member of the Group.

Should no means exist to resolve an existing conflict of interests, the interests of the Bank shall prevail over the interests of the employee of the Bank.

4.5. Common rules for handling gifts and hospitality expenses;

The Bank defines the main objectives of regulation, rules and restrictions in the field of receiving / providing gifts and services in the course of business communication related to the performance of official duties by employees and the Bank's Guidelines, including lists and criteria for permitted and unauthorized gifts, as well as the reasons for their acceptance /

donation. Any prohibited gifts shall be declined / returned to the giver at the time of their delivery.

In accordance with the norms of the Russian Federation legislation, the Bank establishes special rules and restrictions with regard to interaction with officials, as well as with regard to receipt of gifts by the Bank's Management.

Moreover, in accordance with the Russian legislation, it shall be prohibited to give gifts other than ordinary gifts, the cost of which does not exceed three thousand rubles (or an equivalent amount in foreign currency) to persons holding public positions in Russia, public positions in Russian federal entities, municipal positions, government officers, municipal officers, officers of the Bank of Russia in connection with their official position or their performance of official duties.

In case of donating to persons holding public positions in Russia, public positions in Russian federal entities, municipal positions, government officers, municipal officers, officers of the Bank of Russia in connection with their official position or their performance of official duties, it is required be guided by legal restrictions, including the Resolutions of the Government of the Russian Federation and the Civil Code of the Russian Federation.

Providing / receiving gifts or conducting hospitality expenses should under no circumstances be a hidden reward, an attempt to influence the recipient for an illegal purpose, or other actions that may have a negative impact on reputation of the employee, the management bodies of the Bank or the Bank as a whole.

Gifts are not allowed to family members, relatives or other persons close to employees of the Bank, transferred in connection with the conducting of any actions (omission to act) by such employee related to their functional and official duties in the Bank.

While assessing the possibility of obtaining / giving a gift, each employee should be guided by the following principles:

- compliance of the reason with obvious and common principles of the Bank;
- no possibility to influence the objectivity of decisions and / or the emergence of obligations from the employee of the Bank, the counterparty, the client, the partner of the Bank in connection with the receipt / provision of the gift;
- the reasonableness of the gift cost;
- absence in the prohibited list.

Participation in entertainment and social events, accessible to all employees, regardless of their title and position held in the Bank, is allowed.

Hospitality expenses should be directly related to the legitimate objectives of the Bank's activities, comply with the accepted business practices and not go beyond the norms of business communication. The cost of hospitality expenses should be moderate and meet the goals and scope of the events held or the significance of the event.

The detailed rules for handling the gifts and restrictions, including a list of gifts banned to receive/to provide, are defined in internal-regulatory documents approved by the Bank for the development of the principles and provisions of this Policy.

4.6 Charity

The Bank has developed a systematic approach to implementation of the charitable activities, identified the participants in the process and the main directions for the implementation of these charitable activities.

Charity is defined as voluntary activity for the disinterested (gratuitous or preferential) transfer of property to individuals or legal entities, including monetary funds, disinterested

performance of work, provision of services, and other support. Charity does not provide for the provision of advertising services.

Charitable assistance to individuals is provided by the Bank in exceptional cases in accordance with the procedure established by the Bank in the process of granting them applications and documents confirming the justification of such assistance rendering to a certain individual.

In the process of charity the following is implemented:

- control over the cost and expenses estimates for the Bank as a whole;
- verification of the authenticity of information provided by legal entities that apply to the Bank for charitable assistance;
- legal experts review of statutory documents submitted by legal entities that apply to the Bank for charitable assistance;
- transfer of funds allocated in the course of charitable assistance by the Bank to a legal entity.

The decision to provide charitable assistance to organizations is made by an authorized collegial body of the Bank.

The Bank should take measures to make sure that the receiver of the assistance is a bona fide charity fund or any other organization in accordance with /10/, and that there were no reasons to assume that this fund or any other organization is managed directly or indirectly for deriving benefits in favor of a state officer or a person closely related to him or her.

Procedure for the Bank's provision of charity contributions and donations is stipulated by /10/.

4.7. Sponsor activities

The sponsor is the person who provided the funds or provided the means to organize and / or conduct a sports, cultural or any other event, to create and / or transmit a TV or radio broadcast, or to create and / or use a different result of creative activity in exchange for advertising services rendered to the sponsor.

The objectives and main directions of sponsorship are determined by the Bank's marketing policy.

The expediency of the Bank's participation in the sponsorship project is determined, subject to the analysis of the following parameters:

- conformity of the project with the Bank's image;
- conformity of the project with the strategy of the Bank on sponsorship;
- conformity of the cost of the sponsorship package to the advertising opportunities provided therein;
- conformity of the target audience of the intended communication media to the target audience of the Bank;
- experience of cooperation with the organizer;
- experience of participation in the previous project;
- the estimated number of sponsors.

Sponsorship is carried out on the basis of a paid service contract - a sponsorship agreement.

The procedure for the Bank's sponsorship is stipulated by /11/.

4.8. Public and political activities

The Bank does not participate in the activities of political and religious organizations and does not finance their activities. Employees participating in political, religious or other public activities in their free time should act only as individuals and not Bank representatives.

Agitation for any political party or candidate is prohibited on the Bank's premises, and employees should not promote their religious views or beliefs.

Employees of the Bank shall not be allowed to give gifts, make contributions for political purposes, or organize entertaining events for political parties or candidates to political posts on behalf of the Bank or a Group Member.

5. Key functions and powers of the governing bodies, business units and employees of the Bank within the anti-corruption framework

5.1 Supervisory Board of the Bank:

- forms and supports the implementation of the ethical standard, including the uncompromising attitude to any forms and manifestations of corruption, by approving the Code of Corporate Ethics of Sberbank;
- exercises overall control over counteracting corruption and measures taken in this area.

5.2 Executive Board of the Bank:

- approves this Policy;
- bears responsibility for ensuring that the Bank's business complies with the legislation, and meets legislative anti-corruption requirements;
- implements the principles of uncompromising attitude to any forms and manifestations of corruption at all levels; members of the Executive Board serve as the personal example of ethical behavior in the Bank;
- monitors the compliance to this Policy, including the provision of efficient and prompt solution of matters, by other executive bodies within the anti-corruption system.
- determines the need for representatives of the Compliance Department to participate in work of the Bank's collegiate bodies.

5.3 Compliance Committee of the Bank:

- makes decisions on issues and ongoing activities in the framework of an anti-corruption system formation in accordance with /6/.

5.4 Compliance Committee of the Regional Bank:

- considers issues and makes decisions on anti-corruption issues within its competence in accordance with /7/.

5.5 Employees of the Compliance Unit, in accordance with their powers and competence:

- participate in the development of a common methodology in the field of anti-corruption and Sberbank Code of Corporate Ethics, and also support the uniformity of approaches of the Group members, including the provision of consulting support;
- take part in the implementation of anti-corruption procedures and measures in the Bank;
- conduct anti-corruption experts review of internal regulatory and organizational and administrative documents, contracts and agreements, including at the stage of their development and approval, upon the requests made by the relevant developers;

- notify the Intrabank security division of corruption facts or intentions to commit corruption acts by the Bank employees;
- initiate, take part in carrying out official checks and investigations in the field of combating corruption, and may also involve employees of other Bank's business units in case of such a necessity;
- prepare educational materials on anti-corruption themes;
- consult employees of the Bank on anti-corruption matters;
- submit to the Compliance Committee of the Bank/ Compliance Committee of the Regional Bank the cases that are subject to review by such committee in accordance with /6/ and /7/;
- develop recommendations to the Bank management for eliminating causes and conditions enabling corrupt practices by the Bank employees.

5.6. According to their powers, the Intrabank Security Unit:

- prepares and conducts events aimed at revealing and countering corrupt actions of the Bank employees;
- conducts anti-corruption experts review of documents for the Bank's procurement procedures;
- acts as the initiator of official investigations, and also conducts official investigations within the limits of their competence;
- cooperates with law enforcement authorities to provide materials on revealed corruption acts by the Bank employees to bring them to responsibility according to the current Russian Federation legislation;
- undertake measures to protect the Bank employees from the influence of third parties whose acts aim at organizing corruption schemes and practices in the Bank;
- cooperates with the Compliance Division to identify information on the intentions to commit or facts of committing corruption acts by the Bank employees;

5.7. Employees being members of the collegial executive bodies and their deputies:

- identify areas, types of activities and business processes with the high level of corruption risks.

5.8. Employees being heads of independent structural business units of the Bank and their deputies:

- sensitize employees to unconditional fulfillment of the requirements of this Policy and Code of Corporate Ethics of Sberbank, and act as role models of good and ethical behavior;
- identify areas, activities and business processes with a high level of corruption risks based on the scope of authority and functional of independent structural business units, develop and take measures to minimize the risk;
- ensure compliance with the principles and requirements of this Policy by employees who are directly subordinate to them;
- take into account the duration, impeccability and efficiency of discharging their anti-corruption obligations and this Policy by the Bank's employees when assessing personal efficiency of employees for the purposes of motivating the staff.

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5.9. All Bank employees:

- interact with the Bank's Compliance Division on all issues of corruption combating;
- strictly abide by the requirements of the anti-corruption legislation, this Policy, and principles of professional ethics and ethical standards of business conduct;
- while discharging their job functions or carrying out activities on behalf of the Bank in any countries comply with the national anti-corruption legislation (local legislation of foreign states) and provisions of international anti-corruption legislation as well as this Policy;
- refrain from committing acts and taking decisions that could lead to corruption offenses;
- inform the Compliance Unit about each case of violation of this Policy known to/potential/identified by them and/or report via the "Compliance Hotline";
- in case of any doubt with respect to the permissibility of certain actions or other matters relating to the provisions of this Policy, apply to the immediate supervisor and/or to the Compliance Unit for clarifications;

6. Peculiarities of organizing anti-corruption systems by the Group Members

6.1. This Policy shall apply to the Group Members, and the anti-corruption systems shall be organized according to the assumptions and provisions of /4/.

6.2. Group members are obliged to adopt provisions similar to those established in this Policy, in part not inconsistent with local law.

6.3. Until the Group Members create and approve own regulatory anti-corruption documents and mechanisms, employees of the Group Members shall comply with the provisions herein provided the provisions herein are duly approved and adopted by the managerial bodies of the Group Members.

7. Responsibility

7.1. Regardless of their position, all employees of the Bank shall be responsible for complying with the principles and requirements herein, as well as for the acts (omissions to act) of subordinates violating these principles and requirements.

7.2. If, upon results of an internal investigation, the Employees are held guilty of violation of the requirements of this Standard, they may be subject to disciplinary liability, up to dismissal, and civil law liability;

7.3. Persons held by the court guilty of violation of the requirements of anti-corruption laws, may be subject to administrative or criminal liability in accordance with the procedure and on the grounds provided for by the current legislation, internal regulatory and organizational and administrative documents, as well as employment contracts of the Bank.

8. Final Provisions

8.1. This Policy may be amended in the event of any changes in the legislation of the Russian Federation or applicable international law, as well as in order to incorporate new trends in the Russian and global corporate behavior practices. Should any provision herein contradict current legislation of the Russian Federation, the provisions of current legislation of the Russian

Federation shall be applied¹. Should any provisions of this Policy contradict the traditions, practices or someone's understanding of the relevant rules of conduct, the provisions of this Policy shall apply.

8.2. The Bank shall publish this Policy or its separate provisions in free access on the Bank's official website, openly declare its intolerance of corruption, welcome and encourage adherence to the principles and provision herein by all counterparties, employees of the Bank, counterparties and other third parties, and aid in raising the level of anti-corruption culture in the society and among the Bank employee through promoting awareness and training.

8.3. On the principles of reciprocity, the Bank extends the anti-corruption cooperation to state and regulatory authorities, societies and unions of which the Bank is part of, partners and customers of the Group for the following purposes:

- Identify persons suspected in (accused of) conducting corrupt acts, their location, as well as the location of other persons accessory to corruption offenses;
- Identify property received as a result of committing corruption offenses or being a tool for their committing;
- Exchange anti-corruption information;
- Coordinate activities aimed at preventing and fighting corruption.

8.4. All employees of the Bank must be familiarized with the provisions of this Policy against the signature in accordance with the procedure applicable in the Bank.

¹ Should any provisions herein contradict national legislation in the territory of which the Group Members are established or conduct their business, national legislation shall be applied

List of Terms and Definitions

Bank means Sberbank of Russia; Sberbank.

Charitable donations mean payments made without a request for or an expectation of deriving any commercial benefit to registered charity organizations solely for the welfare of the society with the purposes of charity, support of education, social care or other similar purposes.

Contribution for political purposes means a contribution (in cash or in kind) for conducting a political event. Financial contributions in case may include both donations and loans, whereas contributions in kind may include the transfer of goods or services. The term "contributions in kind" may include gifts, property loans, rendering of services, marketing activities advocating particular political parties, purchase of tickets to fundraising events, contributions in favor of research establishments and institutions jointly with political parties, as well as providing the Bank employees with unpaid leaves for conducting political campaigns or occupying some public post.

Group means Sberbank, its subsidiary banks, noncredit subsidiaries and affiliates determined in accordance with the Policy for Sberbank Participation in Profit and Non-Profit Organizations (Except Foreign Banks) /3/, as well as other legal entities, on which the above mentioned organizations have material influence in the decision making by their governing bodies. The term "material influence" shall be used in the meaning stipulated by Article 4 of Federal Law No. 395-1 "On Banks and Banking" dated December 02, 1990.

Official - civil officials of the Russian Federation, the federal unit of the Russian Federation, municipal employees, regardless of the position held, in accordance with the legislation of the Russian Federation, employees of the Bank of Russia, any appointed or elected person holding any office in a legislative, executive, administrative or judicial body of the country of a Group member on a permanent or temporary basis, for remuneration or without remuneration of labor, irrespective of the level of such person's position; any other person performing any public function, including for a public agency or a public entity, or providing any public service, as defined by local legislation of the relevant country or as applicable in the relevant area of the country's legal regulation; employees of organizations established by the state pursuant to the laws; any official or employee of international organizations (for example, the United Nations, OECD, OPEC, the International Olympic Committee, etc.), members of the executive bodies of political parties, candidates for positions in state bodies, close relatives of the persons mentioned above.

Client is an individual or a legal entity that is served by the Bank.

Compliance risk means the risk of application of legal sanctions or sanctions by regulatory bodies, material financial loss or loss of reputation by the Bank as a result of its non-compliance with laws, instructions and rules, standards of self-regulatory organizations or codes of conduct and business ethics.

Counterparty means an individual or a legal entity that is a party to a contract with the Bank, including agents and partners, and not being a Client.

Corruption offense is a committed unlawful act (omission) that has signs of corruption.

Gifts mean any valuable in tangible or intangible form, for which there is no obligation to pay an ordinary consideration, including moneys, securities and other property, benefits and property-related services (works, services, paid entertainment, leisure, transportation, gratuitous loans, discounts; property, including residential, which is made available for use; charitable contributions, donations, etc.), received or provided in connection with the

employment in the Bank. A gift can also be in form of the business breakfast / lunch / dinner; entertaining event; educational event.

Compliance Unit means the compliance unit of the Bank/RB.

Compliance procedure means a number of measures making up an independent process or inbuilt into different stages of other processes, duly regulated and conducted on a continuous basis, aimed at securing the Banks' compliance with the legislation, regulatory requirements and rules.

Protocol events mean visits, receptions and ceremonies arranged to celebrate national (public) holidays, historical events and anniversaries, other celebrations and events of high significance, arrivals of foreign delegations, heads of states, governments, other officials (representatives), as well as meetings and negotiations of both official or business nature.

Bank employee means an individual who has entered into employment relationships with the Bank.

Reasonable value of gift means the actual or estimated value of a gift, which, in case of a potential disclosure to the general public, would not result in the occurrence of any reputational and regulatory risks for the Bank.

Bank Executives mean a category of Bank employees, whose positions are included in the lists established by regulations of federal governmental bodies, and who in the course of holding such positions are subject to restrictions, prohibitions and obligations established by federal laws and other regulations (CEO, Chairman of the Executive Board of the Bank; Deputy Chairmen of the Executive Board of the Bank; Chief Accountant).

Intrabank Security Division is the structural business unit of the Bank, which is entrusted with the functions of preventing, detecting and suppressing offenses planned, being committed or committed by the Bank's employees.

Group Member means a legal entity which is a part of the Group, except the Bank.

List of Reference Documents

1. United Nations Convention against Corruption of 31.10.2003 (ratified by Russia on 17.02.2006)
2. Council of Europe Criminal Law Convention on Corruption of 27.01.1999 (ratified by Russia on 14.07.2006)
3. Policy for Sberbank Participation in Profit and Non-Profit Organizations (Except Foreign Banks) No. 2240-3.
4. Sberbank Compliance Risk Management Policy No. 2885;
5. Regulation on the Organization of Internal Checks by Credit Institutions and Banking Groups No 242-P approved by the Bank of Russia on 16.12.2003
6. Regulation on the Committee of Sberbank on Compliance № 2886-2 dated February 21, 2017
7. Regulation on the Committee of Sberbank Regional Bank on Compliance №2887-2 dated February 21, 2017
8. Sberbank Procedure for Handling Documents Containing Confidential Information, No. 1091-2-r;
9. Sberbank Group Standard for Handling Gifts, Part 2, Sberbank Book of compliance risk management standards No. 4403
10. Sberbank Regulation on Charity Activities No 2326;
11. Sberbank Regulation on Sponsorship No. 2029.
12. Federal Law No. 115-FZ dated August 07, 2011 "On Countering Legalization of Proceeds from Crime (Laundering) and Financing of Terrorism"
13. Federal Law No. 224-FZ dated 27 July 2010 "On Countering the Illegitimate Use of Insider Information and Manipulation of the Market, and on Making Amendments to Separate Legislative Acts of the Russian Federation"
14. Federal Law No. 273-FZ "On Counteracting Corruption", dated December 25, 2008
15. Federal Law No. 79-FZ "On Civil Service in the Russian Federation" dated 27 July 2004
16. The Civil Code of the Russian Federation;
17. Code of Administrative Offences of the Russian Federation
18. US Foreign Corrupt practices Act of 1977
19. UK Bribery Act dated April 08, 2010