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**SUSTAINABLE DEVELOPMENT POLICY
OF E-PROMO**

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INTRODUCTORY PROVISIONS

PURPOSE

This Policy is a fundamental document designed to express the Company's position in the field of sustainable development and formalize the Company's uniform approaches to sustainable development activities, including:

- setting the Company's goals and objectives in this area, as well as defining and systematizing the general principles of the Company's sustainable development activities, which will serve as the basis for evaluating the effectiveness of the relevant activities;
- highlighting the main areas of the Company's activities in the field of sustainable development;
- systematizing the main principles and approaches to corporate social responsibility as the Company's contribution to environmental safety, economic development and social stability in the region of its presence;
- establishing the basic principles of sustainability reporting;
- strengthening the Company's reputation as a responsible business partner.

The Policy was developed in accordance with the requirements of Russian legislation, applicable international law, requirements of Russian and international standards in the field of sustainable development, taking into account the experience of E-Promo LLC, as well as the best practices in the field of sustainable development.

The company strives to comply with the principles of corporate social responsibility, taking into account the principles of the UN Global Compact, the provisions of the International Bill of Human Rights and the UN 2030 Agenda for Sustainable Development.

The policy should help streamline and unify sustainability activities throughout the Group.

SCOPE OF APPLICATION

This Policy is binding on the employees of the Company and subsidiaries of E-Promo LLC, in respect of which the Charters of the Companies, shareholder agreements and other agreements with partner companies do not define a special procedure for shareholders/participants to exercise their rights, including those to manage the Company.

Administrative, internal regulatory and other internal documents shall not contradict this Policy.

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DURATION PERIOD AND AMENDMENT PROCEDURE

This Policy is an internal regulatory document of permanent effect.

The Policy shall be approved, deemed invalid and amended in the Company by the General Meeting of Members of the Group and brought into force in the Company by order of the General Director of E-Promo LLC.

Responsibility for monitoring of compliance with the provisions of this Policy shall be vested in the General Director of E-Promo LLC.

This Policy is approved for a period of 5 years, from July 1, 2021 to July 1, 2026.

SUSTAINABLE DEVELOPMENT GOALS AND OBJECTIVES

The Company aims to comply with the UN Global Compact by becoming part of the corporate responsibility and sustainability community. This step signifies the Company's aspiration to integrate global standards of corporate and social responsibility into sustainable long-term business development.

The Company's sustainability goal is to implement its strategy in accordance with the fundamental principles of the UN Global Compact, namely ensuring their integration into key business processes and commitment to the UN Sustainable Development Goals, high standards of environmental and industrial safety, corporate governance and social responsibility.

To achieve this target, the Company sets the following sustainable development goals:

- Reducing the negative impact of the Companies' activities on the environment and contributing to combating climate change to the minimum economically feasible and technically achievable level;
- Efficient and sustainable use of natural resources;
- Respect for and observance of human rights in all Company processes;
- Ensuring safety of production processes and working conditions, civil defense, health and well-being of internal and external parties concerned in carrying out their activities;
- Facilitating the professional, career and personal growth of the Company's employees;
- Creating an effective and transparent system of interaction with the parties concerned;
- Innovative development at all stages of the Company's activities;
- Promoting competence in and awareness of sustainability standards among the Company's employees, suppliers and contractors, clients and other parties' representatives;
- Prevention of fraud and corruption and implementation of business ethics principles.

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1. GENERAL PRINCIPLES OF THE COMPANY'S ACTIVITIES IN THE FIELD OF SUSTAINABLE DEVELOPMENT AND IMPLEMENTATION OF CORPORATE

The Company adheres to the following principles in its activities:

- **Principle of Integrity and Transparency.** The Company strives to raise awareness of all aspects of sustainability activities among all concerned parties. The Company prepares financial and non-financial statements, the reliability of which is verified by independent auditors to ensure that the information is accurate, meaningful and up-to-date.
- **The principle of development and continuous improvement.** The Company ensures continuous perfecting of internal processes in order to improve the level of organization of sustainable development activities. In order to implement this principle, the Company regularly evaluates the achievements and effectiveness of processes, and actively works with consulting and rating agencies that provide comparative analysis of activities in the field of sustainable development.
- **The principle of adherence to the law and the obligations assumed.** The Company carries out its activities in strict compliance with the current legislation, the applicable rules of international law and fulfills its obligations.
- **The principle of respect for human rights.** The Company recognizes the inviolability of human rights and does not tolerate any form of human rights violations. The company promotes diversity, equal opportunity, opposes child and forced labor, and protects personal data and other fundamental human rights.
- **The principle of respecting the interests of stakeholders.** Stakeholder relationships are built on the basis of mutual interest in the results of such interaction. The company has the flexibility of internal processes and in its activities seeks to balance the interests and expectations of all stakeholders.
- **The Principle of Ethics.** In the process of interaction with all stakeholders, the Company strictly follows the rules of corporate ethics, including those enshrined in the Code of Conduct of E-Promo LLC.

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2. THE MAIN AREAS OF FOCUS IN THE FIELD OF SUSTAINABLE DEVELOPMENT OF CORPORATE SOCIAL RESPONSIBILITY

In carrying out its activities, the Company takes into account the environmental, social and governance principles of sustainable development (Environmental, Social and Governance - ESG).

▪ Environmental Responsibility

The Company, realizing its share of responsibility for the state of the environment, recognizes measures to improve environmental safety as one of the main priorities of its activities and strives not only to reduce the negative impact on the environment, but also to implement measures to mitigate negative consequences.

2.1. Environmental protection and measures to combat climate change

The Company's priorities in implementing its environmental policy are: minimizing the impact on climate advancement reducing the negative environmental impact of production assets, including reduction of greenhouse gas emissions by upgrading equipment and reducing fuel consumption at generation facilities, implementation of energy saving and energy efficiency programs, reduction of pollutant emissions into the atmosphere, polluted wastewater discharges into water bodies, rational use of water resources, and reduction of production waste generation.

In order to achieve joint sustainable development of the Company and the regions of its operation, as well as to obtain economic benefits and advantages, the Company sets itself the following environmental objectives:

- ensuring compliance of the Company's production activities with regulatory requirements and obligations;
- reducing the environmental impact of the Company's activities to the minimum technically achievable and economically feasible level; consistent reduction of economic costs and risks associated with the environmental aspects of production activities;
- achieving consensus among the stakeholders.

One of the main mechanisms for achieving environmental goals and reducing the significance of environmental aspects of the Company's production assets is the phased implementation of the Targeted Environmental Program in the following areas:

- compliance with regulations and obligations;
- reduction of the impact on the environment;
- reduction of economic costs and environmental risks;
- achieving consensus among stakeholders in the field of environmental protection and safety.

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During the term of this policy, the Company plans to initiate the following conservation measures:

- the use of renewable energy sources;
- measurement of greenhouse gas emissions in CO₂ equivalent and minimization thereof;
- other measures aimed at reducing the impact on the environment.

2.2. Saving Electricity

The Company recognizes that the rational use of energy resources is an important value. The Company ensures that the nature and scale of energy use and consumption is under its control.

The Company's activities in the area of energy efficiency and energy conservation are carried out in accordance with unified approaches and principles:

- compliance with Russian law, applicable international law, the requirements of Russian and applicable international standards, industry documents and corporate requirements;
- accounting and monitoring of the energy resources consumption efficiency;
- involvement of all the Company employees in power saving;
- implementation of a set of measures to reduce the specific consumption of energy resources.

2.3. Waste reduction and recycling

The rules for use of the Company's office provide for waste collection at a site that complies with the standards of SanPiN, as well as a place for storing cartons and plastic to be disposed of in accordance with fire safety requirements and SNiPs.

The Company implements the following waste collection and recycling measures:

- removal of waste is done only in special liquid-tight containers (bags);
- solid domestic waste is disposed of in places specially designated for this purpose in accordance with the requirements of environmental, sanitary, fire safety;
- the option of separate waste collection is provided by placing special containers for collecting secondary resources for recycling (plastic waste, paper waste, glass waste);
- a place to collect batteries in special containers for recycling and safe disposal is arranged;
- no disposable tableware is used by employees; using biodegradable cups for visitors to the Company's office.

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In order to preserve a favorable environment, the Company uses the following recycled products:

- merchandise, like eco-bags, made of recycled and recyclable materials in order to reduce the use of disposable bags;
- disposable biodegradable coffee cups for visitors to the Company's office;

The company is committed to expanding environmentally friendly waste collection and recycling measures, as well as the use of recycled products.

2.4. Minimizing the impact on climate advancement reducing the negative environmental impact of production assets

As part of its environmental policy, the Company strives to minimize its impact on the climate and reduce the negative impact of production assets on the environment, including energy conservation, reduction of pollutant emissions into the atmosphere (for example, employees are not allowed to throw mercury-containing lamps into containers), rational use of water resources, and reduction of production waste.

- **Social Responsibility**

The Company is committed to continuous interaction with all internal and external stakeholders, prevention of any form of human rights violations, discrimination, provision of industrial safety, and compliance with other principles and standards of social responsibility.

2.1. Respect for human rights

The Company is committed to ensuring the protection of human dignity and fundamental rights and freedoms, defines responsibilities in the area of human rights risk management, and establishes responsibilities of employees and other stakeholders to respect human rights.

The Company is committed to the absence of any form of discrimination and advocates for equal rights regardless of gender, race, national origin, language, social origin, property and official position, religion, membership in public associations or any other grounds.

As part of its activities, the Company undertakes to:

- respect the human right to life, liberty and security of person;
- prevent the use of any form of forced and child labor in its activities;
- guarantee the right to fair and decent remuneration, safe and healthy working conditions, the right to rest and leisure, as well as the necessary social support, including in cases of illness, disability, loss of close relatives and other cases of loss of livelihood due to circumstances beyond the control of the employee;

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- recognize the right to freedom of association, the right to collective bargaining, the right to form and participate in trade unions to protect their interests;
- respect the right of local communities to favorable living conditions by helping to reduce the negative impact on regions of presence with respect to economic, environmental, social and cultural aspects;
- develop and maintain sociocultural diversity;
- the Group undertakes to engage with stakeholders in order to provide accurate and comprehensive information about the Company's human rights activities.

2..2. Interaction with staff and compliance with the principle of non-discrimination

The company uses effective and transparent processes for recruiting, developing and supporting personnel that meet international standards and provide opportunities to maximize the potential of human resources, and affirms its commitment to socio-cultural diversity and inclusiveness in the workplace.

The Company guarantees employees a decent and safe place to work and promotes the necessary working conditions for high performance. The Company strives to achieve a total absence of any form of discrimination. Sociocultural diversity and inclusion are key elements in the long-term success of the Company, helping to support the development of employee skills and experience, attract new talents and provide our employees with a comfortable work environment that ensures the Companies prosperity.

As part of its activities, the Company undertakes to:

- create a safe, healthy and productive work environment for all employees;
- improve personnel management practices to increase staff satisfaction;
- not tolerate any discrimination or harassment against employees on the basis of race, age, color, sex, disability, marital status, religion, social origin or any other characteristic;
- ensure fair and objective processes and provide candidates with equal opportunities in hiring and employees with equal opportunities in training, performance evaluation, compensation, career development and promotion;
- guarantee the right to fair and decent remuneration, safe and healthy working conditions, the right to rest and leisure, as well as the necessary social support;
- prevent the use of any form of forced and child labor in its activities;
- provide opportunities for continuous development and growth to all employees, as well as encourage them to learn and build their skills useful in the Company's operations;

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- recognize the rights to freedom of association, collective bargaining, and to form and participate in trade unions to protect their interests;
- guarantee equal pay for men and women for work of equal value;
- develop and maintain an inclusive workspace that promotes sociocultural diversity and is sensitive to individual differences;
- strive to create a comfortable work environment where the value of each employee is recognized and the opportunity to be heard is guaranteed. Commitment to recruitment:
- conduct a fair selection of candidates based on uniform parameters for evaluating their qualifications and skills, regardless of gender, race, or nationality, language, origin, property and official status, place of residence, religious orientation, beliefs, membership of public associations, as well as other circumstances unrelated to qualifications and skills;
- develop and apply practices to promote the corporate brand in the labor market in order to spread information about the values and opportunities provided by the Company;
- ensure professional conduct in interviews and other phases of the selection process, and not discriminate or violate human rights;
- support new employees in the process of their on-boarding.

Commitment in performance appraisal work of the company's advancement of employees:

- conduct periodic performance appraisal of employees and provide them with feedback and recommendations for professional skills development and support in building a career plan;
- use objective performance indicators to evaluate employee performance that meet the Company's goals and strategic priorities and promote managerial decisions to improve the Company's performance;
- ensure the transparency of the employee appraisal system, on the basis of which decisions on pay, promotions, and rotation of employees will be made;
- conduct comprehensive appraisal of employees regardless of their role, position or length of service with the Company;
- make decisions on appointments to management positions based on performance, experience, and objective personal and professional qualities.

Commitment to employee training and development:

- guided by the Company's goals and objectives, implement initiatives to develop the skills and competencies of employees necessary to effectively carry out professional activities;
- evaluate the economic situation, industry trends, and current business priorities of the Company to identify the skills that are in demand among the Company's professions, and prioritize the development of

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training programs in these areas;

- conduct corporate training programs that provide employees with the opportunity to develop and gain the knowledge and practical skills necessary for further career advancement;
- apply various effective educational tools depending on the goals and objectives of the training and the target audience of such.

Commitment to the remuneration system:

- apply pay practices that help attract and keep highly qualified

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- personnel;
- set the employee's remuneration in accordance with the position level, based on the results of the assessment of the level of professional competencies, work efficiency, as well as taking into account the reimbursement level of similar positions on the market;
- encourage, including in the form of bonus rewards, high performance, engagement and achievement of corporate goals;
- provide employees with social benefits and guarantees, including voluntary health insurance.

Obligations with respect to the dismissal of employees:

- avoid enforced redundancy and layoffs of employees;
- provide the dismissed employee with the material guarantees provided by law.

2.3. Health, Safety and Environment

Management of occupational, industrial, fire and environmental safety is one of the Company's priority objectives.

The fundamental document defining the principles of workplace safety in the Company is the Company Regulation on the Occupational Health, Industrial, Fire and Environmental Safety Management System.

The main objectives of the Occupational Health, Industrial, Fire and Environmental Safety Management System are:

- the priority of preserving the life and health of employees in the course of their work activities;
- compliance of working conditions at workplaces with occupational safety requirements;
- implementation of consistent and continuous measures to prevent incidents and cases of deterioration of employees' health, industrial injuries and occupational diseases, including through management of occupational risks;
- consideration of the individual needs of employees, including through the design of workplaces, the choice of equipment, personal and collective protective equipment, the development of production processes;
- continuous improvement and enhancement of the effectiveness of the OHSAS;
- mandatory involvement of employees and their authorized representative bodies in the management of labor protection and ensuring labor conditions that meet labor protection requirements through the necessary resource provision and encouragement of such

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- participation;
- personal interest in ensuring, as far as possible, safe working conditions;
- performing other duties in the field of HSE based on the specifics of their activities.

2..4. Interaction with vendors

The Company bases its relationships with Vendors on the principles of efficiency, fairness and legality, and Vendors must comply with applicable laws in all actions and relationships related to the fulfillment of obligations to the Company.

As part of its activities, the Company:

- conducts internal procedures controlling the processes of evaluation, selection and interaction with vendors;
- implement fair and transparent processes and provide equal opportunity in the evaluation and selection of vendors based on uniform criteria;
- ensures that all vendors have access to information on the principles of vendor evaluation and selection, as well as other information necessary for cooperation;
- avoids conflicts of interest when entering into agreements with vendors;
- recognizes the right of vendors to keep the information they provide to the Company confidential.

The Company expects Vendors to adhere to the provisions of this Policy and the provisions of the Code of Conduct and to adhere strictly to the principles contained in this Policy, including:

- respect for human rights;
- ensuring equal conditions of employment and labor;
- environmental protection, health and safety at work;
- compliance with the legislation on protection of competition;
- ensuring the security and protection of personal data.

2..5. Interaction with clients

Client relationships are one of the main areas of the Company's business. In our work we always strive to meet the highest standards of service, providing goods and services based on the principles of client focus and individual approach to everyone.

As part of its activities, the Company undertakes to comply with the following rules:

- The client has the right to receive information about the Company and its work and services;
- The Client has the right to the service culture and compliance with the established standards of service time. When serving Clients, employees are obliged to comply with the following rules of communication:

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- polite, courteous and friendly communication without using words and expressions that do not correspond to the norms of modern Russian literary language (including foul language);
 - equal service regardless of the level of education, gender, nationality, social status, and religious beliefs;
 - the focus of employees on solving Client issues.
- The Client has the right to receive high-quality work and services. The priority task of the Company is to provide services and work of proper quality, consistent with the terms of the contract, as well as consistent with the description provided to clients. The Company provides Clients with a wide range of high-quality goods and services and complete information on ordering and purchasing thereof.
 - The Client has the right to receive services that are implemented in compliance with the requirements of the Law on Protection of Competition. The Company considers inadmissible the actions (omissions) referred to in the Law on Protection of Competition, which result or may result in prevention, restriction, elimination of competition and (or) infringement of interests of other persons (business entities) in the sphere of business activities or an indefinite number of Clients. In addition, the Company considers any action that constitutes unfair competition unacceptable in its activities.
 - The Client has the right to defend their rights. The Client has the right to express his/her opinion about the service provided, as well as to report violations of rights and standards of service.

2..6. Implementation of charitable projects

The Company strives to participate in the economic and social life of all regions where it operates, pursuing a policy of comprehensive social responsibility with the mandatory condition of transparency.

The Company strives to provide organizational and financial support for charitable and other socially-oriented initiatives of its employees.

2..7. Participation in procurement procedures

The Company adheres to a responsible approach to participation in procurement activities, transparency and integrity in the implementation of the Company's activities and improvement of interaction with customers.

The Company's procurement activities are aimed at ensuring timely and complete satisfaction of customers' needs to provide services of proper quality.

3. SUSTAINABILITY REPORTING

The Company is committed to transparency and ensuring that stakeholders are informed about the results of its sustainable development activities,

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including information on the results of interaction with various stakeholder groups.

3.1. Sustainability reporting

The Company annually reports on the actual consumption of resources: water and electricity consumption, as well as the disposal of solid municipal waste. The Company seeks to expand the number of sustainability indicators for which it prepares and publishes reports.

Annual issuance of sustainability reporting is carried out in accordance with this Policy and strives to meet the requirements of the Concept of development of public non-financial reporting, approved by the order of the Government of the Russian Federation dated 05.05.2017 No.876-p.

3.2. Sustainability reporting principles

The basic principles in this area include:

- preparing and issuing reports on the Company's sustainable development on an annual basis in order to inform stakeholders;
- timely publication of reports on the Company's official website to ensure access for all interested parties;

- commitment in reporting to the best international and Russian practices in the field of sustainable development, including such standards as:
 - IPIECA reporting recommendations that take into account industry-specific sustainability activities;
 - the principles of the UN Global Compact;
 - basic performance indicators developed by the Russian Union of Industrialists and Entrepreneurs and ensuring comparability of information in Russian practice of non-financial reporting.

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4. FINAL PROVISIONS

For the purpose of balanced development, the Company intends to ensure, without limitation:

- comprehensive implementation of the Sustainability and Corporate Social Responsibility Policy in harmony with other policies and procedures;
- necessary resources to implement the Sustainability and Corporate Social Responsibility Policy;
- continuous improvement of sustainability and corporate social responsibility processes in order to achieve the level of best practice;
- maximum possible transparency and openness of non-financial activities;
- promoting responsible business practices among its key business partners.

The success of the Company's actions to contribute to the achievement of the Sustainable Development Goals depends on the active involvement of stakeholders in the implementation of this Policy, in this regard, the Company has paid and will pay great attention to informing stakeholders about current and planned activities in the field of sustainable development, as well as receiving and responding to feedback.