

Appendix 2. Report on Compliance with the Principles and Recommendations of the Corporate Governance Code

This Report on compliance with the principles and recommendations of the Corporate Governance Code was reviewed by the Board of Directors of INARCTICA PJSC at its meeting held on 26 May 2024 (Minutes No. 431 dated 27 May 2024). Following the results of the review, the Board of Directors confirms that the data contained in this Report represent complete and reliable information on the Company's compliance with the principles and recommendations of the Corporate Governance Code in 2023.

Assessment methodology: compliance with the corporate governance principles recognised in the Corporate Governance Code was assessed in accordance with the template proposed in the recommendations on the preparation of a report on compliance with the principles and recommendations of the Corporate Governance Code (Letter of the Bank of Russia No. IN-06–28/102 dated 27 December 2021).

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
1.1	The company has to ensure equal and fair treatment of all shareholders in exercising their right to take part in the company management			
1.1.1	The company creates the most favourable conditions for shareholders to participate in the general meeting, develop a justified position on the agenda items of a general meeting, coordinate their actions, as well as an opportunity to express their views on the items considered	The company provides a freely available communication channel such as a Hotline, email or an Internet forum allowing the shareholders to express their opinions and send questions regarding the agenda during the preparation for the general shareholders meeting. These ways of communication were prepared by the company and made available to shareholders at each general meeting during the reporting period	Full compliance	

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1.1.2	The procedure for informing about holding of a general meeting and providing files to a general meeting gives shareholders an opportunity to prepare properly for the participation therein	<ol style="list-style-type: none"> 1. In the reporting period, a message on holding of a general meeting of shareholders is posted (published) on the company's website at least 30 days before the date of the general meeting, unless a longer period is stipulated by law. 2. The notice of the meeting lists the documents required for admission to the venue. 3. Shareholders were provided with access to the information about the person proposing the agenda items and nominating candidates to the board of directors and the auditing commission (in case the commission shall be formed as per the company's charter) 	Full compliance	
1.1.3	In preparation for the general meeting and during the general meeting, shareholders were enabled to receive information about, and all materials related to, the meeting, put questions to executive bodies and members of the board of directors, as well as communicate with each other, in an unobstructed and timely manner	<ol style="list-style-type: none"> 1. In the reporting period, shareholders were given an opportunity to ask questions to members of the executive bodies and the board of directors of the company when preparing and in the course of the general meeting. 2. The position of the board of directors (including dissenting opinions incorporated in the minutes, if any) on each agenda item of the general meetings held in the reporting period was included in the files of the general meeting of shareholders. 3. The company granted eligible shareholders access to the list of persons entitled to participate in the general meeting from the date of its receipt by the company, in all cases of holding of general meetings in the reporting period 	Full compliance	
1.1.4	Shareholders came across no unjustified difficulties in exercising of their right to demand convention of a general meeting, nominate candidates to the management bodies and propose agenda items of a general meeting	<ol style="list-style-type: none"> 1. The company's charter provides for a period for shareholders to propose agenda items of the annual general meeting within at least 60 days from the end of the relevant calendar year. 2. In the reporting period, the company did not refuse to accept proposals related to the agenda items or candidates to the company bodies due to misprints and other insignificant shortcomings in the shareholder's proposal 	Full compliance	
1.1.5	Each shareholder had an opportunity to exercise the right to vote in the easiest and most convenient way without any obstacles	The company's charter provides for an electronic ballot to be filled in on the website given in the notice on the general meeting of shareholders	Full compliance	

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1.1.6	The procedure established by the company for holding of a general meeting gives all persons present at a meeting an equal opportunity to express their opinion and ask questions	<ol style="list-style-type: none"> Sufficient time was provided for reports on the agenda items and discussion of those items at general meetings of shareholders held in the format of face-to-face meetings (joint attendance of shareholders) in the reporting period. Shareholders were given the opportunity to express their opinion and ask questions on the agenda. The company invited nominees to the management and control bodies and has taken all necessary steps to ensure their participation in the general meeting of shareholders, at which their nominations were put to a vote. The nominees to the management and control bodies of the company present at the general meeting were available to answer questions from shareholders. The sole executive body, the accounting officer, the chairperson or other members of the board's audit committee were available to answer questions from shareholders at general meetings of shareholders held during the reporting period. In the reporting period, the company used telecommunication means for remote access of shareholders to participate in general meetings or the board of directors took a reasoned decision that it was not necessary (possible) to use such means in the reporting period 	Partial compliance	<p>Criteria 2 and 4 are not complied with.</p> <p>The Company did not comply with Criterion 2 because the annual General Meeting of Shareholders, which elected the Board of Directors, was held in the form of absentee voting.</p> <p>The Company's notification of the General Meeting of Shareholders lists the phone number for shareholders to call and the email address where they can send questions to the Company's management and Board of Directors through the Corporate Secretary. The Corporate Secretary is responsible to forward any shareholder questions to the appropriate parties and to make sure that as much feedback is obtained as possible.</p> <p>In the materials for the General Meeting of Shareholders, the Company also provides shareholders with comprehensive information on the candidates for the Company's Board of Directors, including information on their professional experience, place of employment at the time of nomination, the people who nominated them, and whether or not they agree to be elected to the Board, and whether or not they meet the independence criteria.</p> <p>The Company is committed to adhering to all of the Code's recommendations and, in the event that a General Meeting of Shareholders is called at which the election of the Board of Directors is to be decided, will take all reasonable steps to ensure that candidates for the Board of Directors are present at the General Meeting of Shareholders in the form of joint attendance.</p> <p>Nevertheless, due to the companies' right to hold Annual General Meetings of Shareholders in the form of absentee voting in 2024, the Company currently has no plans to return to holding Annual General Meetings of Shareholders in the form of joint attendance.</p> <p>Criteria 4 is not complied with, since the Company did not use telecommunications to provide remote access for shareholders to participate in general meetings of shareholders during the reporting period. This is because the Company has not established technical requirements for setting up such access and has not approved the necessary paperwork. In the reporting period, the Company did not hold any General Meetings of Shareholders in the form of joint presence, where it was possible to organise them in a remote format of participation.</p> <p>Nevertheless, the Company provided shareholders with access to the materials of General Meetings of Shareholders 30 days prior to the meeting, and shareholders were able to ask questions by phone or email and vote using the electronic voting system.</p> <p>In 2024, the Company's Board of Directors will consider using telecommunications to enable shareholders to participate in general meetings remotely when making decisions regarding the planning and holding of shareholder general meetings and, together with the Company's management, will make a reasoned decision on the use or non-use of such means</p>

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
1.2	Shareholders are given an equal and fair opportunity to share profits of the company through the receipt of dividends			
1.2.1	The company developed and introduced a transparent and clear mechanism for determining the dividend amount and paying the same	<ol style="list-style-type: none"> The dividend policy of the company was approved by the board of directors and disclosed on the company's website. If the dividend policy of the company, making up the consolidated financial statements, uses the company's reporting indicators to determine the amount of dividends, the relevant provisions of the dividend policy take into account consolidated financial reporting indicators. Justification of the proposed distribution of net profit, including payment of dividends and the company's own needs, and assessment of its compliance with the dividend policy, explanations and economic justification of the need to direct a certain part of net profit to its own needs in the reporting period were included in the materials for the general meeting of shareholders, the agenda of which includes the item of profit distribution (including the payment (declaration) of dividends) 	Partial compliance	<p>Criterion 3 is not complied with.</p> <p>A justification for the proposed distribution of net profit, including for the payout of dividends and the Company's own needs, and an evaluation of its compliance with the Company's Dividend Policy were not included in the materials for the General Meeting of Shareholders during the reporting period.</p> <p>Such justification was regularly provided by the Company's management to the Board of Directors as part of the Company's quarterly performance results.</p> <p>Due to continued high geopolitical and economic uncertainty in 2023, the Company's management and Board of Directors did not disclose the Company's financial results in the first half of 2023 and therefore also did not provide information to shareholders on the calculation and economic feasibility of net profit distributions.</p> <p>In 2024, the Company plans to provide shareholders with justification for the proposed distribution of net profit as part of the information materials for the General Meeting of Shareholders</p>
1.2.2	The company does not resolve to pay out dividends if such resolution, while formally remaining in line with statutory restrictions, is not economically feasible and may lead to a false representation of the company's performance	The company's provisions on the dividend policy, in addition to the restrictions imposed by law, define the financial/economic circumstances where the company should not decide to pay dividends	Full compliance	
1.2.3	The company does not allow the dividend rights of its existing shareholders to be impaired	The Company did not take any actions causing deterioration in terms of dividend rights of existing shareholders in the reporting period	Full compliance	
1.2.4	The company is committed to excluding any other ways of obtaining profit (income) by shareholders at the expense of the company except for dividends and the liquidation value	In the reporting period, there were no other ways for the persons controlling the company to receive profit (income) at the company's expense other than dividends (e.g., through transfer pricing, unjustified provision of services by the controlling person at inflated prices, through internal loans substituting dividends to the controlling person and (or) its controlled persons)	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
1.3	The system and practice of corporate governance ensure equal conditions for all shareholders that own shares of the same category (type) including minority (small) shareholders and foreign shareholders, as well as equal treatment of such shareholders by the company			
1.3.1	The company created conditions for fair treatment of each shareholder by the management bodies and controlling persons of the company, including conditions that ensure inadmissibility of application of any abusive practices by large shareholders in respect of minority shareholders	In the reporting period, the company's controlling persons have not abused their rights in relation to the company's shareholders, there were no conflicts between the company's controlling persons and the company's shareholders and, if any, the board of directors gave them due consideration	Full compliance	
1.3.2	The company does not take actions that result or may result in the artificial redistribution of corporate control	Quasi-treasury shares were absent or did not participate in voting in the reporting period	Full compliance	
1.4	Shareholders are provided with reliable and effective means of keeping record of the rights to shares and an opportunity to dispose of held shares in a free and easy manner			
1.4	Shareholders are provided with reliable and effective means of keeping record of the rights to shares and an opportunity to dispose of held shares in a free and easy manner	The technology and terms of service used by the company's registrar meet the needs of the company and its shareholders and ensure that shareholder rights are recorded and exercised in the most efficient way	Full compliance	
2.1	The board of directors carries out strategic management of the company, defines the basic principles of and approaches to setting up the risk management and internal control system in the company, controls the activities of the executive bodies of the company and performs other key functions			
2.1.1	The board of directors is responsible for making decisions related to the appointment to and dismissal from executive bodies, including in connection with improper performance of duties. The board of directors also controls that the executive bodies of the company act in accordance with the approved development strategy and the main directions of the company's operations	<ol style="list-style-type: none"> As set out in the Charter, the Board of Directors has the authority to appoint, dismiss and determine the terms of contracts in respect of members of the executive bodies. In the reporting period, the nominations (appointments, personnel) committee considered the suitability of professional qualifications, skills and experience of the members of the executive bodies to the current and anticipated needs of the company as dictated by the approved strategy of the company. In the reporting period, the board of directors reviewed the report(s) of the sole executive body and the collegial executive body (if any) on the implementation of the company's strategy 	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
2.1.2	The board of directors establishes the main benchmarks of the company's operations over a long-term horizon, evaluates and approves the key performance indicators and the key business objectives of the company, evaluates and approves the strategy and business plans related to the main operations of the company	In the reporting period, the issues related to the implementation and updating of the strategy, the approval of the financial and economic plan (budget design) of the company, as well as the criteria and indicators (including intermediate ones) of the implementation of the company's strategy and business plans were reviewed at meetings of the board of directors	Full compliance	
2.1.3	The board of directors determines the principles of and the approaches to setting up the risk management and internal control system in the company	<ol style="list-style-type: none"> The principles and approaches to the organisation of the risk management and internal control system in the company are defined by the board of directors and included in the company's internal documents defining the risk management and internal control policy. In the reporting period, the board of directors approved (revised) an acceptable amount of risks (risk appetite) of the company or the audit committee and (or) risk committee (if any) considered the viability of submitting the issue of revising the risk appetite of the company for the consideration of the board of directors 	Partial compliance	<p>Criterion 2 is not complied with.</p> <p>The Company's Board of Directors has not set an acceptable amount of risk (risk appetite) for the Company.</p> <p>It is currently challenging for the Company to develop and maintain an adequate risk appetite due to the numerous uncertainties, many new projects, and considerable investment project costs.</p> <p>Even yet, management continually keeps an eye on the budget and sporadically updates the Board of Directors and the Audit Committee of the Board of Directors on the progress of investment projects and budget execution.</p> <p>The Company is committed to implementing the recommendations of the Code and will discuss with members of the Audit Committee and the Board the need to determine the Company's risk appetite in 2024</p>
2.1.4	The board of directors determines the company's policy on remuneration and (or) reimbursement of expenses (compensation) to members of the board of directors, the executive bodies and other key employees of the company	<ol style="list-style-type: none"> The company developed, approved and implemented a policy(ies) on remuneration and (or) reimbursement of expenses (compensation) to members of the board of directors, the executive bodies and other key employees of the company, approved by the board of directors. In the reporting period, the issues related to the mentioned policy(ies) were reviewed by the board of directors 	Full compliance	
2.1.5	The board of directors plays the key role in preventing, identifying and resolving internal conflicts between bodies of the company, shareholders of the company and employees of the company	<ol style="list-style-type: none"> The board of directors plays the key role in preventing, identifying and resolving internal conflicts. The company developed a system of identification of transactions involving conflicts of interest and a system of measures aimed at solution of such conflicts 	Full compliance	

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2.1.6	The board of directors plays the key role in ensuring transparency of the company, timeliness and completeness of disclosure of information by the company and easy access of shareholders to documents of the company	The company's internal documents define the persons responsible for implementing the information policy	Full compliance	
2.1.7	The board of directors exercises control over the corporate governance practice in the company and plays the key role in significant corporate events of the company	In the reporting period, the board of directors reviewed the results of a self-assessment and/or an external assessment of the company's corporate governance practices	Full compliance	
2.2	The board of directors is accountable to the company's shareholders			
2.2.1	The information about the work of the board of directors is disclosed and communicated to shareholders	<ol style="list-style-type: none"> 1. The annual report of the company for the reporting period includes information on the attendance of board and committee meetings by each board member. 2. The annual report contains the information on the main results of the performance assessment (self-assessment) of the board of directors carried out in the reporting period 	Full compliance	
2.2.2	The chairperson of the board of directors is available for communication with the company's shareholders	The company has a transparent procedure in place to ensure that shareholders are able to present inquiries to the chairperson and receive feedback (and, where applicable, to and from the senior independent director)	Partial compliance	<p>There is no formalised procedure for shareholders to approach the Chair of the Board of Directors.</p> <p>In practice, this procedure is performed by the Corporate Secretary or the person responsible for shareholder and investor relations. Shareholders should send their request to the Corporate Secretary by email to the Company's official website. The Corporate Secretary is then to be required to convey the message to the Chair of the Board of Directors' office and make sure the reply to the message is received.</p> <p>The Company will seek to formalise its shareholder relations process in the following reporting period to guarantee a clear process for submitting messages to the Chair of the Board of Directors and communicating this process to shareholders</p>

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2.3	The board of directors is an effective and professional management body of the company capable of making objective independent judgements and taking decisions in the interests of the company and its shareholders			
2.3.1	Only persons having an impeccable business and personal reputation along with the knowledge, skills and experience necessary to make decisions falling within the jurisdiction of the board of directors and required for the effective performance of its functions, are elected to the board of directors	In the reporting period, the board of directors (or its nomination committee) assessed candidates for the board of directors from the standpoint of the necessary experience, knowledge, business reputation, absence of conflict of interest, etc.	Full compliance	
2.3.2	Members of the board of directors of the company are elected through a transparent procedure, allowing shareholders to obtain information about the candidates sufficient to form an idea about their personal and professional qualities	In all cases when a general meeting of shareholders was held in the reporting period and its agenda included items concerning the election of the board of directors, the company presented shareholders with biographical data of all candidates for members of the board of directors, the results of assessment of the candidates on their professional expertise, experience and skills regarding current and expected needs of the company by the board of directors (or its nomination committee), as well as the information on the compliance of the candidate with the independence criteria in accordance with recommendations 102–107 of the Code and the acquired written consent of candidates for election to the board of directors	Full compliance	
2.3.3	The composition of the board of directors is balanced, including in terms of the qualification of its members, their experience, knowledge and business qualities, and enjoys the trust of shareholders	In the reporting period, the board of directors analysed its own needs in terms of professional qualifications, experience and skills and identified the competencies required by the board of directors in the short and long term	Full compliance	

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2.3.4	The quantitative composition of the board of directors of the company makes it possible to organise the activities of the board of directors in the most effective way including the possibility of creating committees under the board of directors, and gives substantial minority shareholders of the company an opportunity to get the candidate they vote for to be elected to the board of directors	In the reporting period, the board of directors considered whether the number of members of the board of directors meets the needs of the company and the interests of the shareholders	Full compliance	
2.4	The board of directors includes a sufficient number of independent directors			
2.4.1	<p>An independent director is a person who has sufficient professionalism, experience and autonomy to form his or her own position and who is able to judge objectively and good faith judgement, independent of the influence of the company's executive bodies, individual shareholder groups or other stakeholders.</p> <p>It should be borne in mind that in normal conditions, a candidate (an elected member of the board of directors) related to the society, a substantial shareholder, substantial contractor or competitor of the company or related to the state cannot be considered independent</p>	In the reporting period, all independent members of the board of directors met all independence criteria specified in recommendations 102–107 of the Code or were acknowledged independent by resolution of the board of directors	Full compliance	

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2.4.2	The company assesses whether candidates to members of the board of directors comply with the independence criteria, and regularly analyses whether independent members of the board of directors comply with the independence criteria. In such an assessment, content should prevail over form	<ol style="list-style-type: none"> 1. In the reporting period, the board of directors (or the nomination committee of the board of directors) drew up an opinion on the independence of each candidate to the board of directors and presented a relevant conclusion to shareholders. 2. During the reporting period, the board of directors (or the nomination committee of the board of directors) reviewed the independence of the current board members at least once (following their election). 3. The company developed procedures to determine the necessary actions of a member of the board of directors in the event that he or she ceases to be independent, including the obligations to inform the board of directors thereof in a timely manner 	Full compliance	
2.4.3	Independent directors make up at least one third of the elected composition of the board of directors	Independent directors make up at least one third of the composition of the board of directors	Full compliance	
2.4.4	Independent directors play the key role in preventing of internal conflicts in the company and making of significant corporate actions by the company	In the reporting period, independent directors (who had no conflict of interest) performed a preliminary assessment of significant corporate actions related to a possible conflict of interest and presented the results of such assessment to the board of directors	Full compliance	

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2.5	The chairperson of the board of directors promotes the most effective performance of functions assigned to the board of directors			
2.5.1	An independent director is elected to chair the board of directors, or a senior independent director is appointed from the number of the elected independent directors to coordinate the work of independent directors and interact with the chairman of the board of directors	<ol style="list-style-type: none"> The chairperson of the board of directors is an independent director or a senior independent director is appointed from the number of independent directors. The role, rights and obligations of the chairperson of the board of directors (and a senior independent director where applicable) are duly defined in the company's internal documents 	Partial compliance	<p>Criterion 1 is not complied with.</p> <p>As at the reporting date, the Board of Directors of the Company had not found it possible to elect an independent non-executive director as Chair or to appoint a Senior independent non-executive director.</p> <p>The Chair of the Board of Directors may not always be an independent member of the Board of Directors.</p> <p>The members of the Company's Board of Directors elect the Chair of the Board from among them by a majority vote of all the votes cast by the Board, in compliance with the Company's internal documents and established practice. The Board of Directors may at any time re-elect the Chair of the Board of Directors by a majority of votes of the total number of the Company's Board members.</p> <p>The members of the Board of Directors unanimously elected E. Chernova as Chair of the Board of Directors in 2022, and on 30 June 2023, E. Chernova was re-elected to this position. Ms. Chernova has more than seven years of experience as a Company's Board member, contributes to the effective work of the Board of Directors and the application of best corporate governance practices. Ekaterina Chernova encourages open debate and the active participation of the Board members during meetings. E. Chernova's work as Chair of the Board of Directors is highly appreciated by members of the Board of Directors.</p> <p>Nevertheless, the Company is committed to complying with the recommendations of the Code, and the Corporate Secretary of the Company periodically informs the independent members of the Board of Directors at Board meetings about the possibility of electing a Senior Independent Director.</p> <p>Members of the Board of Directors agreed to revisit the need to elect a Senior Independent Member of the Board of Directors and the candidature of the Senior Independent Director after the election of the Board of Directors at the Annual General Meeting of Shareholders in 2024</p>
2.5.2	The chairperson of the board of directors creates a constructive atmosphere during meetings, ensures free discussion of the meeting agenda issues, control over the execution of decisions made by the board of directors	Performance of the chairperson of the board of directors was assessed within the framework of the assessment of performance of the board of directors in the reporting period	Full compliance	

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2.5.3	The chairperson of the board of directors takes the required measures for the timely provision of members of the board of directors with the information necessary to make decisions on the agenda issues	The responsibility of the chairperson of the board of directors to take measures for the timely provision of board members with files on the agenda issues of a board meeting is stipulated in the internal documents of the company	Full compliance	
2.6	Members of the board of directors act in good faith and reasonably in the interests of the company and its shareholders, being duly informed, with due care and diligence			
2.6.1	Members of the board of directors make decisions taking into account all available information, in the absence of a conflict of interest, based on the principles of equal treatment of shareholders of the company, within the limits of usual business risk	<ol style="list-style-type: none"> The internal documents of the company stipulate that a member of the board of directors is obliged to notify the board of directors if they have a conflict of interest in relation to any issue on the agenda of a meeting of the board of directors or a committee of the board of directors before the start of the discussion of the relevant agenda item. The internal documents of the company state that a member of the board of directors shall refrain from voting on any issue in respect of which they have a conflict of interest. The company has a procedure that enables the board of directors to receive professional advice on matters within its jurisdiction at the expense of the company 	Full compliance	
2.6.2	Rights and obligations of members of the board of directors are clearly formulated and enshrined in the internal documents of the company	The company adopted and published an internal document clearly defining rights and obligations of members of the board of directors	Full compliance	
2.6.3	Members of the board of directors have sufficient time to carry out their duties	<ol style="list-style-type: none"> Individual attendance of the board and committee meetings, as well as sufficient time for work on the board of directors, including its committees, is analysed as part of the board of directors' performance assessment (self-assessment) procedure in the reporting period. In accordance with the internal documents of the company, members of the board of directors are required to notify the board of directors of their intention to enter management bodies of other companies (apart from companies controlled by the company) as well as of the fact of such appointment 	Full compliance	

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2.6.4	All members of the board of directors have equal access to the documents and information of the company. Newly elected members of the board of directors are provided with sufficient information about the company and operations of the board of directors as soon as possible	<ol style="list-style-type: none"> In accordance with the company's internal documents, members of the board of directors have the right to obtain information and documents necessary for the members of the company's board of directors to perform their duties in relation to the company and its controlled entities, and the company's executive bodies are obliged to ensure that the relevant information and documents are provided. The company has a formal familiarisation programme in place for newly elected members of the board of directors 	Full compliance	
2.7	Meetings of the board of directors, preparation for and participation of members of the board of directors in such meetings ensure effective performance of the board of directors			
2.7.1	Meetings of the board of directors are held as necessary, taking into account the scope of activities and objectives of the company at a particular point in time	The board of directors held at least six meetings in the reporting year	Full compliance	
2.7.2	The internal documents of the company enshrine a procedure for the preparation and holding of meetings of the board of directors providing members of the board of directors with an opportunity to prepare properly for such meetings	<ol style="list-style-type: none"> The company approved an internal document defining the procedure for the preparation and holding of meetings of the board of directors, which, among other things, established that a notification of a meeting should be normally made at least five days before the meeting. In the reporting period, members of the board of directors who were absent from the venue of the meeting were given the opportunity to participate in the discussion of agenda items and vote remotely: via conference and video conferencing 	Full compliance	
2.7.3	The form of a meeting of the board of directors is determined depending on the importance of the issues on the agenda. The most important issues are resolved at the meetings held in presentia	The company's charter or internal documents stipulate that the most important matters (including those listed in Recommendation 168 of the Code) should be considered at meetings of the board of directors held in person	Full compliance	

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2.7.4	Decisions on the most important issues of the company's activities are made at a meeting of the board of directors by a qualified majority or a majority of votes of all elected members of the board of directors	The charter of the company stipulates that decisions on the most important issues, including those set out in recommendation 170 of the Code, must be made at a meeting of the board of directors by a qualified majority of at least 3/4 of votes or by a majority of votes of all elected members of the board of directors	Full compliance	
2.8	The board of directors forms committees for preliminary consideration of the most important issues of the company's activities			
2.8.1	The audit committee consisting of independent directors was formed for preliminary consideration of the issues related to control over financial and economic operations of the company	<ol style="list-style-type: none"> The board of directors formed the audit committee, consisting solely of independent directors. The internal documents of the company define the objectives of the audit committee, including those contained in recommendation 172 of the Code. At least one member of the audit committee, who is an independent director, has experience and knowledge in the preparation, analysis, assessment and audit of accounting (financial) statements. Meetings of the audit committee were held at least once a quarter in the reporting period 	Full compliance	
2.8.2	A remuneration committee consisting of independent directors and headed by an independent director who is not the chairperson of the board of directors is formed for the preliminary consideration of the issues related to the development of the effective and transparent remuneration practice	<ol style="list-style-type: none"> The board of directors formed the remuneration committee that consists solely of independent directors. The chairperson of the remuneration committee is an independent director who is not the chairperson of the board of directors. The company's internal documents determine the tasks of the remuneration committee, including, but not limited to, the tasks covered by recommendation 180 of the Code, as well as the conditions (events), upon the occurrence of which the remuneration committee considers revision of the company's remuneration policy for the members of the board of directors, executive bodies and other key executives 	Partial compliance	<p>Criterion 3 is not complied with.</p> <p>The Regulations on the Nomination and Remuneration Committee of the Board of Directors set out the tasks of this Committee, including those contained in recommendation 180 of the Code. However, these Regulations do not define the conditions (events), upon the occurrence of which the Nomination and Remuneration Committee of the Board of Directors considers the review of the Company's remuneration policy for members of the Board of Directors, executive bodies and other key management personnel.</p> <p>Nevertheless, the Nomination and Remuneration Committee occasionally addresses issues relating to the remuneration of the Company's executive bodies and employees at its meetings. In 2023, The Nomination and Remuneration Committee was actively involved in developing the goal map and setting KPI values for all of the Company's senior managers, as well as discussing the employee incentive scheme and the share option plan at meetings.</p> <p>The Company endeavours to comply with the recommendations of the Code and will consider in 2024 whether it is necessary to supplement the Regulations on the Nomination and Remuneration Committee with conditions for reviewing the Company's remuneration policy for members of the Board of Directors, executive bodies and other key management personnel</p>

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
2.8.3	The company formed the nomination (appointment, personnel) committee with the majority of members being independent directors for the preliminary consideration of issues related to human resources planning (succession planning), professional composition and efficiency of performance of the board of directors	<ol style="list-style-type: none"> 1. The board of directors formed the nomination committee, with the majority of members being independent directors (or its objectives specified in recommendation 186 of the Code are accomplished by another committee). 2. The internal documents of the company define the objectives of the nomination committee (or a corresponding committee with combined functions) including the ones contained in recommendation 186 of the Code. 3. In order to form the board of directors that best meets the company's goals and objectives. The nomination committee organised shareholder relations, not limited to the major shareholders, in the context of selecting candidates to the company's board of directors in the reporting period, either independently or jointly with other committees of the board of directors or the company's authorised shareholder relations unit 	Full compliance	
2.8.4	The board of directors of the company made sure that the composition of its committees fully met the purposes of the company, taking into account the scope of operations and the level of risk. Additional committees were either formed or not recognised as necessary (the strategy committee, the corporate governance committee, the ethics committee, the risk management committee, the budget committee, the health, safety and environment committee, etc.)	In the reporting period, the board of directors of the company considered whether the structure of the board of directors is appropriate to the scope and nature, business goals and needs, and risk profile of the company. Additional committees were either formed or not recognised as necessary	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
2.8.5	The composition of the committees is determined in such a way as to allow for a comprehensive discussion of the preliminary considered issues, taking into account different views	<ol style="list-style-type: none"> The audit committee, the remuneration committee, and the nomination committee (or the relevant committee of a combined nature) were chaired by independent directors in the reporting period. The internal documents (policies) of the company include provisions stipulating that persons not entering the audit committee, the nomination committee (or the relevant committee of a combined nature) and the remuneration committee may attend committee meetings only at the invitation of the chairperson of the relevant committee 	Full compliance	
2.8.6	Committee chairpersons regularly inform the board of directors and its chairperson of the operations of their committees	During the reporting period, committee chairpersons reported regularly to the board of directors on the work of the committees	Full compliance	
2.9	The board of directors ensures the assessment of the quality of performance of the board of directors, committees and members of the board of directors			
2.9.1	Assessment of the quality of performance of the board of directors is aimed at determination of the effectiveness of performance of the board of directors, committees and members of the board of directors, the degree of compliance of their operations with the company development needs, activation of operations of the board of directors and identification of areas where their operations can be improved	<ol style="list-style-type: none"> The company's internal documents set out the procedures for assessing (self-assessing) the board of directors' performance. The assessment (self-assessment) of the performance of the board of directors carried out in the reporting period included an assessment of the performance of the committees, an individual assessment of each member of the board of directors and the board of directors as a whole. The results of the assessment (self-assessment) of the board of directors' performance carried out in the reporting period were reviewed at an in-person meeting of the board of directors 	Full compliance	
2.9.2	The performance of the board of directors, committees and members of the board of directors is assessed on a regular basis at least once a year. an external organisation (consultant) is engaged at least once every three years to carry out an independent assessment of the board of directors' performance	The company engaged an external company (consultant) to conduct an independent assessment of the quality of the performance of the board of directors at least once for the three last reporting periods	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
3.1	The corporate secretary of the company is effectively interacting with shareholders, coordinates the actions of the company to protect the rights and interests of shareholders, supports the effective performance of the board of directors			
3.1.1	The corporate secretary has the knowledge, experience and qualification sufficient for performing his/her duties, an impeccable reputation and enjoys the trust of shareholders	The company's website and the annual report contain biographical information of the corporate secretary (including information on age, education, qualifications, experience) as well as information on the positions held by the corporate secretary in the management bodies of other legal entities for at least the last five years	Full compliance	
3.1.2	The corporate secretary has sufficient independence from the executive bodies of the company and has the necessary powers and resources for fulfilling the tasks assigned to him/her	<ol style="list-style-type: none"> 1. The company adopted and disclosed an internal document – the provision on the corporate secretary. 2. The board of directors approves the candidate for the position of the corporate secretary and terminates his/ her powers, as well as considers the payment of additional remuneration. 3. The company's internal documents stipulate the corporate secretary's right to request and receive company documents and information from management bodies, structural units and officials of the company 	Full compliance	
4.1	The level of remuneration paid by the company is sufficient to attract, motivate and retain persons who have the competence and qualification necessary for the company. Remuneration is paid to members of the board of directors, the executive bodies and other key executives of the company in accordance with the remuneration policy adopted in the company			
4.1.1	The level of remuneration provided by the company to members of the board of directors, the executive bodies and other key executives creates sufficient motivation for their effective work, enables the company to attract and retain competent and qualified professionals. At the same time, the company avoids greater than necessary levels of remuneration, as well as an unjustified big gap between the rates of remuneration of the mentioned persons and the company employees	The remuneration of members of the board of directors, executive bodies and other key executives of the company is determined taking into account the results of a comparative analysis of remuneration levels in peer companies	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
4.1.2	The company's remuneration policy is developed by the remuneration committee and approved by the board of directors of the company. The board of directors together with the remuneration committee ensures control over the introduction and implementation of the remuneration policy in the company, and revises and amends it if necessary	In the reporting period, the remuneration committee reviewed the remuneration policy(-ies) and (or) practices of its (their) implementation, assessed their efficiency and transparency, and, if necessary, submitted respective recommendations to the board of directors on the revision of the said policy(-ies)	Full compliance	
4.1.3	The company's remuneration policy contains transparent mechanisms for the determination of the amount of remuneration of members of the board of directors, the executive bodies and other key executives of the company and regulates all types of payments, benefits and privileges granted to the mentioned persons	The company's remuneration policy (policies) contains (contain) transparent mechanisms for determining the amount of remuneration to the members of the board of directors, the executive bodies and other key managers of the company, as well as regulates (regulate) all types of payments, benefits and privileges provided to these persons	Full compliance	
4.1.4	The company determines the policy of expense compensation (compensations) that specifies a list of expenses to be compensated for and the level of service that the members of the board of directors, of the executive bodies and other key managers of the company can count on. Such policy may be a component of the company's remuneration policy	The remuneration policy (policies) or in other internal documents of the company establish the rules for compensation of expenses to the members of the board of directors, the executive bodies and other key managers of the company	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
4.2	The system of remuneration to the members of the board of directors ensures convergence of financial interests of the directors with long-term financial interests of the shareholders			
4.2.1	<p>The company pays a fixed annual remuneration to the members of the board of directors. The company does not pay any remuneration for participation in individual meetings of the board of directors or its committees.</p> <p>The company does not apply any types of short-term motivation or additional financial incentives to members of the board of directors</p>	<ol style="list-style-type: none"> In the reporting period, the company paid remuneration to the members of the board of directors in accordance with the remuneration policy adopted by the company. In the reporting period, the company did not apply any forms of short-term motivation or additional financial incentives to the members of the board of directors, the payment of which depends on the results (indicators) of the company's operations. No remuneration was paid for participation in individual meetings of the board of directors or board committees 	Full compliance	
4.2.2	<p>Long-term ownership of shares in the company contributes most to aligning the financial interests of the board members with the long-term interests of the company's shareholders. In doing so, the company does not precondition the right of realisation of shares by achieving certain performance indicators and the members of the board of directors do not participate in stock option plans</p>	<p>If the internal document (documents) – the company's remuneration policy (policies) – stipulates (stipulate) the provision of the shares of the company to the members of the board of directors, clear rules of ownership of shares by the members of the board of directors aimed at encouraging long-term ownership of such shares shall be envisaged and disclosed</p>	Full compliance	
4.2.3	<p>The company does not provide for any additional payments or compensations in case of early termination of the powers of the members of the board of directors in connection resulting from the change of control over the company or otherwise</p>	<p>The company does not provide for any additional payments or compensations in case of early termination of the powers of the members of the board of directors in connection resulting from the change of control over the company or otherwise</p>	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
4.3	The system of remuneration to the members of the executive bodies and other key managers of the company stipulates the dependence of remuneration on the company's performance and their contribution to achieving this result			
4.3.1	The remuneration to the members of the executive bodies and other key managers of the company is determined in such a way as to ensure reasonable and justified correlation between the fixed and variable portions of the remuneration which depends on the company's performance and personal (individual) contribution of the employee to the outcome	<ol style="list-style-type: none"> In the reporting period, the annual performance indicators approved by the board of directors were used to determine the variable remuneration of members of the executive bodies and other key executives of the company. In the course of the last assessment of the remuneration system for the members of the executive bodies and other key managers of the company performed, the board of directors (the remuneration committee) made sure that the company uses an effective ratio between the fixed and variable portions of the remuneration. In determining the remuneration payable to members of executive bodies and other key executives of the company, the company accounts for the risks borne by the company to avoid creating incentives for excessively risky management decisions 	Full compliance	
4.3.2	The company implemented the programme of long-term motivation for the members of the executive bodies and other key managers of the company using the shares of the company (stock option plans or other derivative financial instruments with company shares as the underlying asset)	If the company has introduced a long-term incentive scheme for members of executive bodies and other key executives of the company using company shares (financial instruments based on company shares), the scheme stipulates that the right to sell such shares and other financial instruments shall not arise earlier than three years after their provision. The right to sell them is conditional on the achievement of certain performance indicators of the company	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
4.3.3	The amount of compensation (golden parachute) that the company pays in case of early termination of their powers to the members of the executive bodies or key managers, as initiated by the company, and in the absence of unfair acts on their part, shall not exceed a two-fold amount of the fixed portion of the annual remuneration	The amount of compensation (golden parachute) that the company pays in case of early termination of their powers to the members of the executive bodies or key managers, as initiated by the company, and in the absence of unfair acts on their part, did not exceed a twofold amount of the fixed portion of the annual remuneration during the reporting period	Full compliance	
5.1	The company has a reliable risk management and internal control system in place to give reasonable certainty that its goals will be met			
5.1.1	The Board of Directors determined the principles of and the approaches to setting up the risk management and internal control system in the company	The functions of various corporate bodies and units of the company in the risk management and internal control system are clearly defined in internal documents/respective policy of the company approved by the board of directors	Full compliance	
5.1.2	The company's executive bodies are in charge of establishing and maintaining an efficient internal control and risk management system	The executive bodies of the company ensured that duties, powers, responsibilities in the area of risk management and internal control are distributed between the heads (managers) of departments and divisions reporting to them	Full compliance	
5.1.3	The risk management and internal control system of the company provides an objective, fair and clear view of the current state and prospects of the company, integrity and transparency of the company's reporting, reasonableness and acceptability of the risks taken by the company	<ol style="list-style-type: none"> The company has an approved anti-corruption policy in place. The company ensured a safe, confidential and easy-to-use way (hotline) of informing the board of directors or the audit committee under the board of directors on the facts of violation of the legislation, the internal procedures and the ethical code of the company 	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
5.1.4	The board of directors of the company takes necessary measures to make sure that the risk management and internal control system of the company is consistent with the principles of and approaches to its organisation defined by the board of directors and is functioning effectively	<ol style="list-style-type: none"> In the reporting period, the board of directors (audit committee and/ or risk committee, if any) organised an assessment of the reliability and effectiveness of the risk management and internal control system. In the reporting period the board of directors reviewed the results of the assessment of the reliability and effectiveness of the company's risk management and internal control system, and the details of the review are included in the company's annual report 	Full compliance	
5.2	The company organises internal audits to methodically and impartially assess the accuracy and efficiency of the risk management, internal control system, and corporate governance procedures			
5.2.1	The company has a separate structural unit or engages an independent external company to conduct an internal audit. The functional and administrative accountability of the internal audit unit is differentiated. Functionally, the internal audit unit reports to the board of directors	To conduct an internal audit, the company established a separate structural internal audit unit functionally reporting to the board of directors or engaged an independent external company following the same accountability principle	Full compliance	
5.2.2	The internal audit unit assesses the reliability and effectiveness of the risk management and internal control system, as well as the corporate governance, and applies generally accepted standards of internal audit	<ol style="list-style-type: none"> In the reporting period, internal audit assessed the reliability and effectiveness of the risk management and internal control system. In the reporting period, internal audit assessed corporate governance practices (individual practices), including communication procedures (including those related to internal control and risk management) at all management levels of the company, as well as stakeholders relations 	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
6.1	The company and its activities are transparent for shareholders, investors and other interested persons			
6.1.1	The company developed and implemented an information policy that ensures effective information exchange between the company, shareholders, investors and other interested persons	<ol style="list-style-type: none"> The board of directors of the company approved the company's information policy developed with regard to the recommendations of the Code. In the reporting period, the board of directors (or one of its committees) reviewed the efficiency of communication between the company, shareholders, investors and other stakeholders and the advisability (necessity) to revise the company's information policy 	Full compliance	
6.1.2	The company discloses the information on the corporate governance system and practice, including detailed information on the compliance with the principles and recommendations of the Code	<ol style="list-style-type: none"> The company discloses information on the company's corporate governance system and general principles of corporate governance applicable to the company, including on the company's website. The company discloses information on the composition of the executive bodies and the board of directors, independence of members of the board of directors and their membership in the committees of the board of directors (in accordance with the definition given in the Code). If there is a person controlling the company, the company publishes a controlling person memorandum concerning the plans of such person in respect of corporate governance in the company 	Full compliance	
6.2	The company timely discloses complete, up-to-date and reliable information about the company to ensure opportunities for making justified decisions by the company's shareholders and investors			
6.2.1	The company discloses information in accordance with the principles of regularity, consistency, efficiency, accessibility, reliability, completeness and comparability of the information disclosed	<ol style="list-style-type: none"> The company has established a procedure to ensure that all structural units and employees of the company who are involved in the disclosure of information or whose activities may lead to the need to disclose information coordinate their work. If the company's securities are traded in foreign securities markets, the disclosure of substantial information in the Russian Federation and in such markets shall be performed simultaneously and equivalently during the reporting year. If foreign shareholders hold a significant number of the company's shares, the disclosure of information during the reporting year was performed not only in Russian but also in one of the most widespread foreign languages 	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
6.2.2	The company avoids a formal approach to disclosing information and discloses the substantial information on its business, even if the disclosure of such information is not stipulated by the law	<ol style="list-style-type: none"> The company's information policy defines approaches to the disclosure of information on other events (actions) that have a significant impact on the value or quotation of its securities, the disclosure of which is not required by law. The company discloses complete information on the structure of the company's capital in the annual report and on the company's website in accordance with recommendation 290 of the Code. The company discloses information on controlled entities that are material to it, including key areas of their activities, mechanisms for ensuring accountability of controlled entities, the authority of the company's board of directors to determine strategy and assess performance of controlled entities. The company discloses a non-financial report – a sustainability report, environmental report, corporate social responsibility report or any other report containing non-financial information, including factors related to the environment (including environmental and climate change-related factors), society (social factors) and corporate governance, except for the equity issuer's report and the annual report of a joint stock company 	Partial compliance	<p>Criterion 2 is complied with partially.</p> <p>In order to safeguard its shareholders and the Company itself in 2022–2023, the Company decided not disclose information regarding its shareholding structure on the Company's website owing to heightened sanctions risks.</p> <p>However, the Company has consistently made its shareholding structure public knowledge and disclosed it in the Company's annual reports, and did so again in the text of the present Annual Report.</p> <p>The withholding of information on capital structure is temporary and the Company plans to return this information to its website in 2024.</p>
6.2.3	As one of the most important tools for the exchange of information between shareholders and other stakeholders, the annual report contains information enabling assessment of the company's performance for the year	<ol style="list-style-type: none"> The company's annual report contains information on the audit committee's assessment of the effectiveness of the external and internal audit processes. The company's annual report contains information on the company's environmental and social policies 	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
6.3	The company provides information and documents as requested by the shareholders in accordance with equal and unhindered access principles			
6.3.1	There are no unreasonable difficulties for shareholders in exercising their right of access to the company's documents and information	<ol style="list-style-type: none"> The company's information policy (internal documents defining the information policy) defines a non-onerous procedure for providing access to the company's information and documents upon shareholders' request. The information policy (internal documents defining the information policy) contains provisions stipulating that if a shareholder requests information on organisations controlled by the company, the company shall make the necessary efforts to obtain such information from the relevant organisations controlled by the company 	Full compliance	
6.3.2	When the company provides information to shareholders, it maintains a reasonable balance between the interests of individual shareholders and the interests of the company itself, seeking to protect the confidentiality of important commercial information, which can have a significant impact on the company's competitiveness	<ol style="list-style-type: none"> During the reporting period, the company did not refuse to satisfy the shareholders' requests for information, or such refusals were justified. In cases provided for by the information policy of the company, shareholders are warned of the confidential nature of information and undertake to keep it confidential 	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
7.1	The actions that significantly influence or may influence the structure of the share capital and financial standing of the company and, accordingly, the shareholders' state (material corporate actions), are performed on equitable conditions that ensure compliance with the rights and interests of the shareholders as well as of other stakeholders			
7.1.1	Material corporate actions include reorganisation of the company, acquisition of 30 percent and more of the voting shares of the company (take-over), the performance of material transactions by the company, increase or decrease of the share capital of the company, listing and delisting of shares of the company and other actions that may lead to a significant change in the shareholders' rights or infringe upon their interests. The charter of the company defines a list (criteria) of transactions or other actions that are recognised as material corporate actions, and such actions refer to the competence of the company's board of directors	The company's charter define the list (criteria) of transactions or other actions that constitute material corporate actions. Decision-making in respect of material corporate actions refers to the competence of the board of directors as stated in the charter. When these corporate actions are directly referred by the legislation to the competence of the general meeting of shareholders, the board of directors makes recommendations to shareholders accordingly	Full compliance	
7.1.2	The board of directors plays a key role in making decisions or developing recommendations concerning material corporate actions; the board of directors relies on the position of independent directors of the company	The company has a procedure for independent directors to state their position on material corporate actions prior to their approval	No compliance	<p>The Company does not have a procedure for independent members of the Board of Directors to state their position on material corporate actions.</p> <p>The concept and list of material corporate actions appeared in the Company's Charter in 2022, and the Company has not yet regulated the procedure for independent Board members to state their position on such matters.</p> <p>Nevertheless, all members of the Board of Directors are entitled to express their dissenting opinions on items on the agenda of the meeting, including those relating to material corporate actions. Such dissenting opinion shall be appended by the Company Secretary to the minutes of the relevant meeting.</p> <p>The Company strives to implement the recommendations of the Code and in 2024 will consider amending the Company's internal documents to regulate the procedure for independent members of the Board of Directors to declare their positions on material corporate actions</p>

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
7.1.3	<p>The company ensures equal conditions for all of its shareholders if material corporate actions affect the rights and legal interests of shareholders, and implements additional measures protecting the rights and legal interests of shareholders of the company if the legal mechanisms aimed at protecting the rights and legal interests of shareholders are insufficient.</p> <p>The company is guided not only by formal legal requirements but also by the corporate governance principles set forth in the Code</p>	<ol style="list-style-type: none"> Given the nature of the company's business, the board of directors is authorised by the company's charter to approve other transactions that are material to the company, in addition to those provided for by law. During the reporting period, all the material corporate actions went through the procedure of approval prior to their execution 	Full compliance	
7.2	The company provides a procedure for performing material corporate actions that allows the shareholders to obtain in due time complete information on such actions and gives them an opportunity to influence the performance of such actions and guarantees compliance with the appropriate level of protection of their rights as such actions are performed			
7.2.1	The information on performance of material corporate actions is disclosed with an explanation of the reasons, conditions and consequences of such actions	If material corporate actions have been taken by the company in the reporting period, the company disclosed such actions in a timely and detailed manner, including the reasoning behind them, the conditions under which the actions were taken and the consequences of such actions for shareholders	Full compliance	

Ser. No.	Corporate governance principles	Criteria for assessing compliance with the corporate governance principle	Status of compliance with the corporate governance principle	Explanations of deviation from criteria for assessing compliance with the corporate governance principle
7.2.2	The rules and procedures associated with the company's performance of material corporate actions are enshrined in the internal documents of the company	<ol style="list-style-type: none">1. The internal documents of the company define the cases and the procedure for involving an appraiser to estimate the value of the property, alienated or purchased through a major transaction or an interested-party transaction.2. The internal documents of the company stipulate the procedure for involving an appraiser to estimate the value of purchase and buyback of the company's shares.3. If there is no formal interest of a member of the board of directors, the sole executive body, a member of the collegial executive body of the company, a person who is a controlling person of the company or a person entitled to give instructions binding to the company, in the company's transactions, but there is a conflict of interest or other actual interest, the internal documents of the company provide that such persons shall not participate in voting on the approval of such transaction	Full compliance	