



## Updated Code of Conduct of VK

Over the past five years, the team of VK professionals has grown by almost threefold and today exceeds 11,000 people. To ensure that we all interact in an honest partnership and rely on the same principles, we have reviewed and refreshed our Code of Conduct.

The updated Code contains 10 rules on which our work relationships and processes are based. The Code applies to all of our employees, members of the Board of Directors and to businesses controlled by VK. We make sure that our partners and counterparties, as well as the assets in which we invest, share our principles, approaches and values.

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Vladimir Kirienko, CEO of VK (Russia) said: "Every day, tens of millions of people use VK's online and offline services. And we value their trust in our company, our products and our solutions. To maintain and foster this trust, we must act honestly - towards ourselves and our clients. How to act honestly? Respect users, business partners and each other. Comply with laws and corporate policies. Do what's right."

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### **Rule 1. Treat each other with respect and care**

In VK:

- we follow the laws, rules and regulations of the countries in which we operate;
- we comply with the rules, principles and policies of our company;
- we treat each other with respect, regardless of position/title;
- we do not offend each other and do not discriminate on any grounds;
- child and forced labor are prohibited in VK;
- we support the right to safe working conditions and education;
- we ensure the safety and health of employees in their daily work, as well as comply with all safety regulations in the workplace;
- we minimize waste and optimize the use of natural resources to protect the environment.

### **Rule 2. Avoid conflict of interest**

We avoid conflict of interest and try to warn of its possibility. Our employees must notify the Compliance Department of their additional employment or activities of close relatives that may lead to a conflict of interest.

It is important for us to remain objective when making decisions and dealing with partners, therefore we refuse gifts from our business partners if this implies a reciprocal favor. We do not give or accept gifts in the form of money or equivalents, as well as any alternative gifts with high value.

### **Rule 3. Protect company confidential data and intellectual property**

Users trust us with their personal information, and we have the duty to protect it. We make sure that user data is protected, we do not use it for personal purposes and do not share it with third parties and government agencies - except when the transfer of information is required by law.

The company protects personal data and complies with the laws of the countries where it operates. Our intellectual property is also protected, i.e. information about our products, services and solutions, new developments, business plans, etc.

### **Rule 4. Respect the rights and freedoms of users**

Users have the right to personal security, the safety of their data and tangible assets. When creating Internet projects and services, we are guided by the principles of legality, fairness and reasonableness. We do not accept calls for violence, child pornography, propaganda of terrorism, support of any criminal offense, or content prohibited by law. Therefore, we create and use tools in our products that help fight against illegal materials in the public Internet space.

### **Rule 5. Do not use insider information**



Our employees may not buy or sell shares of VK, partners and counterparties if they hold insider information. Such information includes, for example, data on investments, mergers and acquisitions, expected financial results, changes in the composition of senior management, etc.

**Rule 6. Advertise fairly**

We make sure that the advertising of our products and services does not mislead people and does not violate the law, we carefully verify the truthfulness of our messages. We do not advertise our products and services with inappropriate, illegal or offensive material.

**Rule 7. Compete fairly**

We compete in good faith, which means we strive to increase our market share by developing the products and technologies we offer to users and improving their quality. We also comply with antitrust laws.

**Rule 8. Keep transparent records**

Transparent reporting allows us to analyze and fairly evaluate our operational activities, and most importantly, it allows us to make short- and long-term business plans. Documentation must comply with accounting principles and be complete, accurate, reliable and timely. We apply these integrity principles to all company reporting.

**Rule 9. Build honest relations with the state and comply with anti-corruption laws**

In dealing with government agencies or their representatives, our company respects the law and does not abuse its influence. The main principle in the interaction is honesty, i.e. we do not mislead, do not hide information and provide correct documentation. Also, employees of the company should not receive or give bribes in any form.

**Rule 10. Report violations and ask questions**

Employees are encouraged to report an actual or upcoming violation, incident, crime, express any concerns or suspicions, as well as ask any questions in difficult situations or regarding the rules of this Code - freely and anonymously.

For questions regarding the implementation of the Code, or compliance claims and issues, VK employees and other parties can contact:

- The confidential Independent Trust Line, 8 800 770-79-71, [www.servicetrust.ru](http://www.servicetrust.ru)
- Compliance Department, Legal Department, HR, Internal Audit Department,
- The special bot in the corporate messenger VKTeams or using a chat bot in Telegram @VK\_servicetrust\_bot



**For further information please contact:**

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