

SUSTAINABLE DEVELOPMENT POLICY

VK COMPANY LIMITED

(hereinafter "VK" or "the Company")

I. APPLICATION

- 1.1. VK's Sustainable Development Policy (hereinafter - Policy) is a public document reflecting the Company's position on sustainable business development and forming a uniform approach to activities in this area for VK and legal entities under direct and/or indirect control.
- 1.2. This Policy is the main document of the Company in the field of sustainable development which also takes into account the provisions of such internal documents of the Company as the [VK Code of Conduct](#), the [Charter of the Audit, Risk, Compliance and Sustainable Development Committee of the Board of Directors of the Company](#), and other internal documents regulating various aspects related to ESG and sustainable development, including ESG risk management.
- 1.3. The policy establishes the principles and key areas of the Company's ESG and sustainable development activities and helps develop a common understanding of said principles among all stakeholders, including management, users, employees, shareholders, contractors, suppliers.
- 1.4. The policy is aimed at implementing sustainable development goals, which meets the long-term economic interests of the business, helps preserve the environment and improve the quality of life and social well-being of citizens in the regions where the Company operates. Sustainable development is an integral part of the Company's business.
- 1.5. The Policy was developed in accordance with the applicable laws of the Russian Federation, as well as international acts, standards, recommendations and initiatives in the field of sustainable development.
- 1.6. The Policy applies to all VK employees regardless of their position or occupation, as well as to members of the Board of Directors. The Company also expects its business partners to adhere to the principles set forth in the Policy.
- 1.7. Should VK acquire new assets or a controlling interest in companies, it is mandatory to implement the Policy in said assets or companies.

II. BASIC SUSTAINABLE DEVELOPMENT PRINCIPLES GUIDING THE COMPANY

**Approved by the Board of Directors of VK Company Limited
on March 15th, 2023**

The company operates according to the following principles of sustainable development.

2.1. The principle of ethical business conduct

- 2.1.1 The company conducts its business in accordance with the principles outlined in VK's Code of Conduct.
- 2.1.2 The Company is committed to high standards of ethical business conduct: it carries out its business and interacts with partners and users guided by the principles of honesty, integrity and openness.
- 2.1.3 The Company's activities comply with the applicable laws provided that they do not contradict Russian laws and regulations.
- 2.1.4 The Company respects and strives to observe the balance of interests of all stakeholders. The Company ensures that any breach of applicable laws, policies and Company procedures, as well as the relevant suspicions can be reported via the compliance hotline.
- 2.1.5 The Company implements sustainability principles in its operations, plans its sustainability activities and integrates them into its business plans.
- 2.1.6 The Company strives to inform stakeholders about all aspects of its operations and to ensure that the information it provides is accurate, meaningful, relevant and timely.

2.2. The principle of social responsibility

- 2.2.1 The Company complies with applicable laws on human rights, creates a corporate culture based on awareness and respect for other people, maintaining cultural and any other forms of diversity, and the inadmissibility of any forms of harassment, discrimination or violence.
- 2.2.2 The Company encourages a respectful and ethical work environment and ensures that employees are protected from moral and physical abuse in the workplace. The Company does not tolerate discrimination against VK employees or other people in general.
- 2.2.3 The Company strives to provide social support to employees and their families, promote professional growth of employees by offering regular feedback and opportunities for training and self-development. Any employee growth and promotion are based solely on objective criteria within the framework of established business practices and the Company's corporate policies, such as experience, job responsibilities and performance benchmarks.

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2.2.4 The Company contributes to the promotion of high standards to ensure decent and safe working conditions and the development of human potential.

2.2.5 The Company develops, applies and improves motivation tools so that employees maintain strong professional performance.

2.2.6. VK's development priorities are to ensure information security and data integrity for all of the Company's users under the applicable laws, and to respect the right to privacy.

2.2.7. The Company supports the systemic development of socially important projects, including the implementation of projects with representatives of stakeholders, creating new opportunities for the development of regions of presence and addressing social needs.

2.2.8. The Company participates in charitable projects in the sphere of social change, ecology and support of non-profit organizations via the Dobro Mail.ru service and its verified charitable organizations.

2.2.9 The Company strives to make its products more accessible, including to disadvantaged groups.

2.2.10. The Company's sustainability activities are implemented with due consideration of socio-economic, geographical, cultural and other specifics of the regions where it operates.

2.3. The principle of environmental responsibility

2.3.1 The Company adopts a responsible attitude to the impact it has on the environment and implements responsible environmental management models.

2.3.2 The Company strives to increase the efficiency of electricity, heat and fuel use, reducing the anthropogenic impact on the climate.

2.3.3 The Company complies with the requirements, norms, obligations in the field of environmental protection, rational use of natural resources and environmental safety, applicable to the Company's activities, in adherence with the legislation of the Russian Federation and international treaties ratified by the Company.

2.3.4 The Company strives to foster an eco-friendly culture among its employees.

2.4. The principle of corporate governance responsibility

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- 2.4.1 The Company establishes and implements a governance system that ensures the preservation of assets and successful development of VK in the long term and protects the interests of all shareholders.
- 2.4.2 The Company develops and implements unified corporate governance standards considering ESG factors, requirements and recommendations of the regulators of the countries of presence, as well as analysis of the best industry practices.
- 2.4.3 The Company strives to disclose information on its activities and performance, and on the decisions it makes, in order to inform stakeholders in a timely, detailed and reliable manner.
- 2.4.4 The Company strives to form a responsible supply chain, and expects its suppliers to comply with the principles and standards of sustainable development and to ensure compliance with customer sustainability requirements and standards.
- 2.4.5 The Company's risk management activities are aimed at identifying and assessing risks on various organizational levels of the Company, across a range of structural units and business processes.
- 2.4.6 The Company implements a set of regular measures to manage risks and determine their connection to the Company's governance processes, as well as to raise stakeholders' awareness of risks.
- 2.4.7 It is critical for the Company that all its suppliers and other counterparties comply with the law and adhere to high environmental, social, corporate governance and business ethics standards. The Company adheres to the principle of zero tolerance for corruption. VK ensures that anti-corruption standards, procedures and controls are implemented in accordance with legal requirements.
- 2.4.8 Should a VK employee or stakeholder representative become aware or have reason to believe that a violation of the law, of this Policy or other Company policies and procedures has occurred or is about to occur, they can report the matter to the VK compliance hotline.

III. ADHERENCE TO PRINCIPLES AND ENFORCEMENT OF THE POLICY

- 3. The company is committed to improving its sustainability record and integrating responsible business principles into daily operations.
 - 3.1 The Audit, Risk, Compliance and Sustainable Development Committee oversees compliance with the Policy.

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3.2 The Policy is administered by VK's executive bodies including a special Sustainability Team, consisting of VK employees focused on promoting a variety of sustainability initiatives in the Company.

3.3 The Company monitors the effectiveness of measures to ensure compliance with the Policy, monitors their implementation, and improves them as necessary.

3.4 This Policy is to be communicated to employees via established communication channels.

3.5 The Company shall take steps to address and prevent violations of the Policy in accordance with established procedures.

3.6 The overall results of the Company's sustainability performance are reflected in the Company's public non-financial reporting.

IV. APPROVING AND CHANGING THE POLICY

4.1. This Policy, as well as all addenda and amendments hereto, shall be approved by the VK Board of Directors.

V. TERMS AND DEFINITIONS

The following terms are used in this Policy.

Stakeholders	Any individual or group of individuals or legal entities who influence or are influenced by the Company's performance.
ESG	All environmental, social and governance aspects of the Company's activities pertaining to the adherence of the Company to the concept of sustainable development.
Sustainable development	The concept of building a global community in which the needs of the present generation are met without compromising the needs of future generations.
Sustainability team	A group composed of designated employees and stakeholders involved in sectors associated with sustainable business development.