

VK Supplier Code of Conduct



Every day we help millions of people solve problems online and **strive to improve their lives through our services and products.**

Suppliers are essential to this effort. We value our suppliers highly and expect them to share our corporate values and commitment to responsible and ethical business practices.

To that end, we have created the VK Supplier Code of Conduct, which is a set of business conduct rules that should be followed when doing business with VK.

The Code is intended for all VK suppliers who provide goods, their labor or services to us (including contractors, consultants, intermediaries, distributors and agencies).

diligent VK suppliers adhere to the following principles:

- Fulfil contractual obligations
- Adhere to fair competition practices
- Comply with anti-corruption laws
- Avoid conflicts of interest
- Report openly and transparently
- Respect privacy and protect information
- Take special care of VK assets
- Respect human rights and freedoms
- Provide labor protection
- Protect the environment

Contents



1. Introduction into the VK Supplier Code of Conduct	4
<u>What is the purpose of the VK Supplier Code of Conduct?</u>	5
<u>Code application</u>	6
<u>How we choose our suppliers</u>	7
2. Principles of a diligent VK supplier	8
<u>Ethics and Integrity</u>	9
<u>Proper contract execution</u>	10
<u>Fair competition</u>	10
<u>Anti-corruption</u>	11
<u>Avoiding conflicts of interest</u>	12
<u>Transparency in reporting and disclosure</u>	13
<u>Protecting information and economic interests</u>	14
<u>Confidentiality and information protection</u>	15
<u>Handling VK assets with care</u>	16
<u>Corporate Social Responsibility</u>	17
<u>Respect for human rights and freedoms</u>	18
<u>Labor protection</u>	20
<u>Environmental protection</u>	20
3. Implementing principles of the VK Supplier Code	21
<u>Compliance with the Code</u>	22
<u>Reporting violations</u>	23
<u>Final provisions</u>	24

1. Introduction





What is the purpose of the VK Supplier Code of Conduct?

VK and its subsidiaries, including subsidiaries and joint ventures (hereinafter referred to as "VK", "the Company" or "we") are committed to transparent and responsible business practices. Our success is built on the high ethical standards we have established and uphold every day. The VK Code of Corporate Conduct governs our activities. The Code is available in the Corporate Governance section of our website at <https://vk.company/en/>.

Millions of people use VK services every day. We value their trust in our products and solutions, and in the company as a whole. Suppliers are critical to the smooth operation of VK, user satisfaction, and maintaining the company's reputation.

We strive to create a sustainable supply chain of goods, work and services for VK. We take great care in selecting business partners. We seek to develop honest, trustworthy and long-term relationships with all of them.

That is why we require our suppliers to share our values and to communicate them to their employees, partners and anyone else involved in a partnership with VK.

This VK Supplier Code of Conduct (hereinafter referred to as the "Code") contains the fundamental business principles that all suppliers must follow when doing business with VK.

This document will help our suppliers understand what the company expects of them in the following areas:

- Ethical conduct and legal compliance;
- Protection of information and economic Interests;
- Corporate social responsibility.



Code application

The code applies to suppliers who are doing or wish to do business with VK.

"Supplier" means any legal or natural person who supplies goods, performs work or provides services to the Company (including contractors, consultants, intermediaries, distributors, agents and others).

If Suppliers delegate their obligations under an agreement with VK to third parties (e.g. subcontractors), they must ensure that the third parties comply with the principles of this Code. Any supplier shall notify VK should they learn information or have concerns that subcontractors have violated or may violate the principles of this Code.





How we choose our suppliers

We build relationships with our suppliers
strictly on legal and fair terms.

1

We carefully select each supplier based on objective criteria such as commercial terms, quality of goods, their work, services, qualifications and company reputation.

2

In deciding whether to work with a supplier, we may also consider whether the supplier adheres to the ideals of this Code.

3

VK also selects its suppliers through electronic trading platforms to improve transparency and competitiveness.

2. Principles of a diligent VK supplier

Ethics and integrity

Protecting
information and
economic interests

Corporate Social
Responsibility

Ethics and integrity

VK complies with all applicable laws, maintains high ethical standards and expects the same from its suppliers. It is essential that we develop trustworthy and honest relationships with our partners.



Ethics and integrity

We expect our suppliers to maintain high ethical standards and adhere to the following guidelines:



Proper contract execution

We expect our suppliers to fulfil their contractual obligations to VK in a timely and comprehensive manner.

They ensure the high quality and safety of their goods, labor and services offered in strict compliance with legal requirements and contractual terms.

We also require our suppliers to ensure the stability and continuity of their supplies to VK, and to pay special attention to the preparation of business continuity plans and the recovery of activities in the event of unforeseen circumstances.



Fair competition

It is important to us that suppliers comply with applicable antitrust laws, respect their competitors and adhere to the principles of fair competition. We do not accept illegal competitive tactics such as price fixing, market division, improper sharing of confidential information with competitors, abuse of dominance, and other types of unfair competition. We expect our suppliers will not provide inaccurate or misleading information about their products or services.

Ethics and integrity

3

Anti-corruption

VK strictly prohibits all forms and manifestations of corruption, including bribery, commercial bribery and other illegal contributions to obtain or retain business benefits.

We will not tolerate our partners engaging in corruption in their business activities. In dealing with their customers and suppliers, government officials or other third parties, our suppliers may not accept, offer, promise or deliver unlawful remuneration or use any other unlawful means or incentives.

VK may include an anti-corruption clause in contracts that outlines the mutual obligation of the parties to prevent corruption violations and their culpability for non-compliance.

Exchange of gifts or any offer of hospitality



All gifts or any offer of hospitality that we receive from our suppliers or that our suppliers receive from VK must be legal.



Gifts or any offer of hospitality should not impair the objectivity of the recipient's business judgment, nor should they place the recipient in a position of dependency or make them feel obligated.



We do not give or accept money (cash or non-monetary) or its equivalent as a gift.

Ethics and integrity

4

Avoiding conflicts of interest

When doing business with VK, our suppliers avoid situations that could lead to a conflict of interest.

A conflict of interest is defined in this Code as a scenario in which the personal interests of an employee or other person associated with the supplier affect or may affect the proper and objective performance of their duties, including situations during the development of business relationships with VK.

We expect our suppliers to disclose any conflicts of interest to VK, including cases where they see a potential conflict of interest in our partnership.

You can do this by sending an email to compliance@vk.team or by calling the VK [Compliance Hotline](#) (see "Reporting Code Violations" below for more information).

In the event of a conflict of interest, our suppliers agree to thoroughly investigate the matter and take the necessary steps to resolve it.

Conflicts of interest may arise in the following situations:



(co)owner, manager or employee of a supplier is a close relative¹ of a VK employee who makes decisions pertaining to said supplier (e.g., participates in the selection of a supplier, in the conclusion and/or execution of a contract);



(co)owner, manager or employee of the supplier who works part-time or provides services to VK;



receiving and giving expensive gifts and any offer of hospitality, as well as other gifts that do not comply with the requirements of this Code (For more details, see the principle "Anti-Corruption. Exchange of gifts and any offer of hospitality).

¹Children (including adopted children), parents, spouses (including those in a civil marriage), brothers and sisters (including step siblings), aunts, uncles, grandparents, grandchildren, as well as brothers and sisters, parents of spouses or spouses of children, and all those whom a person considers a close relative, are all considered close relatives.

Ethics and integrity

5

Transparency in reporting and disclosure

Our suppliers adhere to strict reporting standards (accounting, tax, management, etc.) in compliance with applicable laws. They ensure the accuracy, completeness and reliability of accounting data and the availability of supporting documentation. Suppliers shall faithfully comply with all legal tax obligations.

Suppliers shall not interfere with VK's ability account for expenses and payments related to the supplier's work in a comprehensive and timely manner. It is prohibited to alter or manipulate documents in order to affect the accurate representation of business transactions.

Our suppliers strive for open and transparent cooperation and are willing to share up-to-date information about their activities with VK (subject to any confidentiality agreements).



Protecting information and economic interests

We respect and protect the confidentiality and personal information of our employees, users, partners, and anyone else with whom we do business. In turn, we expect our suppliers to protect the information and property we entrust to them and to comply with applicable laws and contractual requirements.



Protecting information and economic interests

1 Confidentiality and information protection



When doing business with VK, our suppliers comply with all applicable laws and standards, as well as VK's policies and procedures regarding privacy, information security, confidential and insider information.

Suppliers are expected to be responsible for preserving and protecting confidential information obtained in the course of doing business with VK. Our suppliers use confidential information only to fulfil their contractual obligations. They may not disclose or transfer such information to third parties without VK's prior written consent.

In the event that our suppliers gain access to insider information and are included in the company's list of insiders, they agree not to conduct stock market transactions using insider information, and they also agree not to transfer it to other people to conduct such transactions.

Because unauthorized use or disclosure of confidential information can result in significant losses (financial, reputational, etc.) for both suppliers and VK, our suppliers agree to take all technical and organizational precautions to protect information (including from cyber-attacks).

If weaknesses or vulnerabilities in information systems are discovered, our suppliers shall do everything in their power to eliminate them as soon as possible. Suppliers must immediately notify VK of any suspected or actual data leaks or other information security issues.

Protecting information and economic interests

2

Handling VK assets with care



If suppliers use VK assets (such as computer and server equipment, office equipment, consumables, software, intellectual property, etc.) in the delivery of goods, performance of work or provision of services, suppliers must act responsibly and treat such assets with care.

Our suppliers guarantee that all physical and intellectual assets of VK are used for their intended purposes and with the appropriate consent from VK.

Our suppliers comply with all intellectual property regulations. They do not use VK's intellectual property (such as trademarks, logos, patented solutions, software products, etc.) without prior written consent or for reasons other than those specified in commercial agreements with VK.

Suppliers protect VK's assets and ensure that their employees and other third parties in their dealings with VK do not misuse VK's assets.

Corporate Social Responsibility

VK is one of the largest IT companies in Russia, employing thousands of people and serving millions of users. It is vital that we create a positive and safe work environment, and that our social interactions are based on respect and trust.



Corporate Social Responsibility

We expect our suppliers to adhere to the following key principles:

1

Respect for human rights and freedoms



Our suppliers conduct their business in accordance with human rights and freedoms. The following is a minimum list of such rights:

Respectful behavior toward each other. Non-discrimination and equal opportunity.

Our suppliers do not tolerate any form of discrimination and base their interactions solely on respect for each other, regardless of job title, position or other qualities.

Decent working conditions

We expect our suppliers to comply with all applicable labor laws, including those governing wages, working hours, etc. Recruitment, employment and performance evaluation of employees must be based solely on objective criteria within the context of generally accepted business practices, such as experience, job responsibilities and performance indicators.

Corporate Social Responsibility

Harassment and violence are unacceptable

Our suppliers do not tolerate any form of harassment, hostility or threats directed at colleagues, partners, users or others.

We expect our suppliers to avoid the use of violence and to address any issues or disagreements in a civil manner.



Inclusive environment

We expect our suppliers to actively support the creation of an inclusive and diverse culture and to work hard to make their workplace accessible.



Forced labor, coercion, and underage labor are unacceptable

Our suppliers do not use forced labor, child labor, or human trafficking. All employees must be willing to work and be aware of the working conditions.

Corporate Social Responsibility

2

Labor protection

Our suppliers take all necessary steps to ensure compliance with legal requirements and to improve working conditions. They ensure the safety of the working environment and reduce the risk of accidents and harm to the health of their employees.



3

Environmental protection



We work with suppliers who share our concern for the environment. We expect our suppliers to have strong environmental policies and to comply with all applicable environmental laws and regulations.

Our suppliers take a proactive approach to environmental challenges by implementing programs to increase environmental responsibility and promote the adoption of environmentally friendly technologies. We encourage our suppliers to recycle raw materials, reduce emissions and discharges of pollutants, and eliminate them through all possible means.

3. Implementing principles of the VK Supplier Code of Conduct



Compliance with the Code

We expect our suppliers to adhere to the values outlined in this Code. VK reserves the right to conduct audits or request information to ensure compliance with the Code. We will notify suppliers in advance of such audits and work out the arrangements. We expect our suppliers to voluntarily ensure the agreed upon course of the audit whenever necessary. We guarantee that the audit will be completed without interfering with the supplier's routine operations.

If any non-conformities are found during the inspection, we expect our suppliers to take all necessary steps to correct them. If necessary, VK will make every effort to assist suppliers. Suppliers refusing to comply or correct non-conformities may be grounds for termination of business relations with VK, up to and including termination of the contract.



Reporting violations

Suppliers are expected to report any suspected or known violations of this Code or the law related to our business. When reporting a violation or suspicion, the complainant must provide as much information as possible to help us take timely and appropriate action.

VK prohibits retaliatory action against those who raise legitimate concerns or report a violation or suspicion. VK evaluates all reports objectively and in complete confidentiality. The complainant's safety is our highest priority. You may also report a violation anonymously by contacting the VK Compliance Hotline at <https://www.servicetrust.ru/>.





Final provisions



The Code is intended as general guidance and is subject to applicable law. It does not replace the law or the provisions of supplier contracts. VK and its suppliers are bound by the Code when the principles of the Code result in a business relationship that is more restrictive than the applicable law. In the event of a conflict between this Code and the law, the applicable law shall prevail.

VK reserves the right to change or modify the principles of the Code to ensure its relevance and compliance with legal obligations.

The latest version of this Code, revisions and other information on VK's compliance with the principles can be found in the "Corporate Governance" section of the website <https://vk.company/en/>.

