

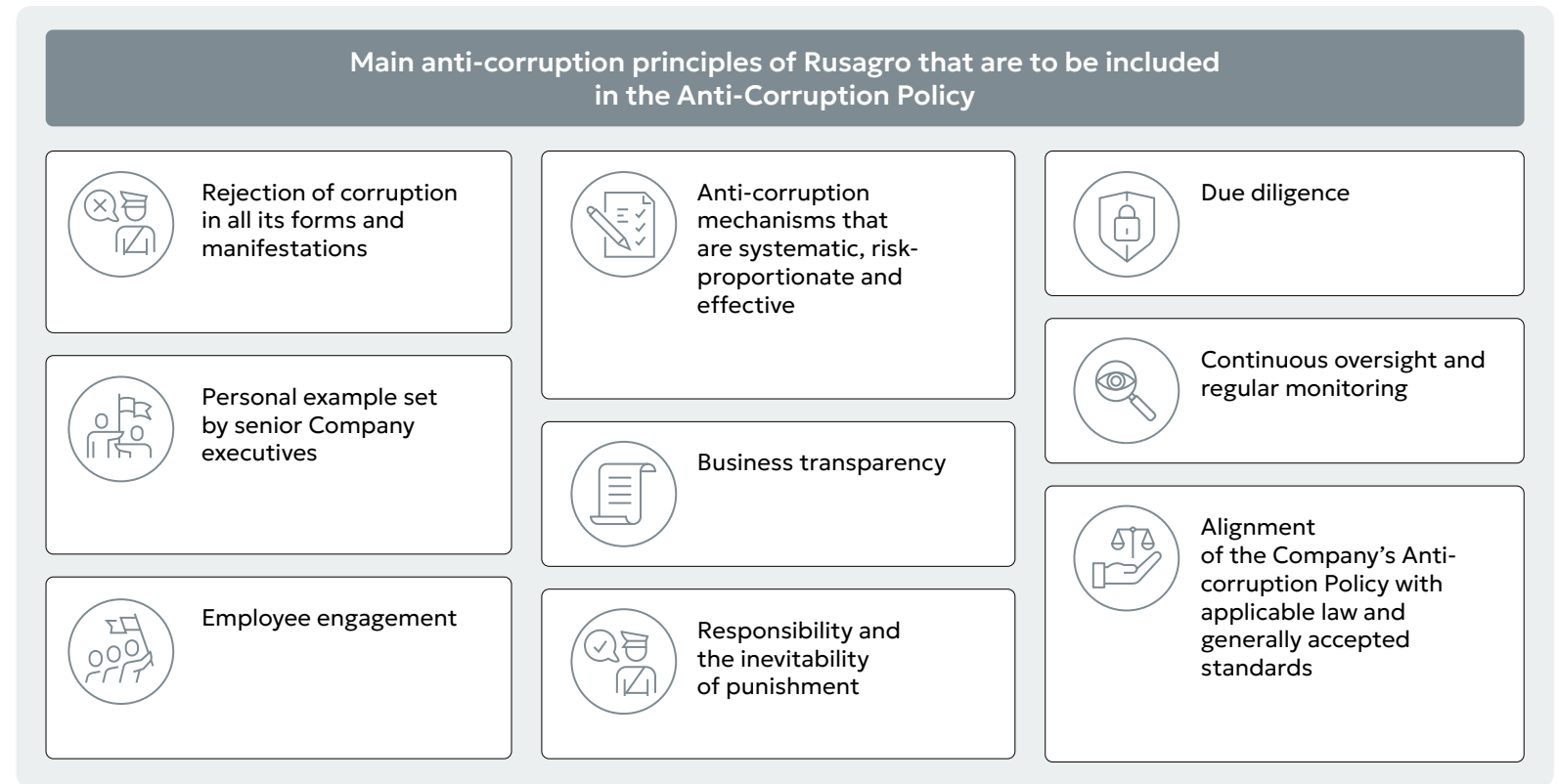
# ANTI-CORRUPTION

## Description of the anti-corruption system

Rusagro Group recognises the importance of anti-corruption to effective corporate governance, the Group's reputation and the achievement of compliance objectives.

The anti-corruption policy is the main document that regulates anti-corruption measures taken by public joint stock companies. The Group plans to put an anti-corruption policy in place.

Compliance with the principles and requirements of the policy, as well as compliance with the requirements of applicable anti-corruption laws and regulations of the Russian Federation shall be mandatory for all employees equally. The policy shall also apply to counterparties and others who may act on behalf of the Company.



## Anti-corruption results in 2024

The Group has the Security Service and the Internal Audit Service (IAS), which are responsible for monitoring, preventing attempted fraud and reporting on anti-corruption activities to the Group's governing bodies. According to internal documents, staff members of the above services, along with any other staff members, are required to notify the Group CEO of any fraud or corruption attempts that are discovered. An annual corruption risk assessment is carried out across all Rusagro divisions.

The Board of Directors is provided with anti-corruption reports, as well as reports on rolled-out anti-corruption measures and the effectiveness of the anti-fraud and anti-corruption system.

### Employee training arrangements

#### Training programmes

Training sessions are constantly given to employees, especially for those who have recently joined Rusagro. Training topics include familiarisation with anti-corruption policies, training on how to identify corruption risks and what to do if they are detected.

#### Online courses

Employees take anti-corruption courses on a distance learning platform.

### Anti-corruption projects

#### Counterparty verification system 1

A system of counterpart integrity checks is in place to reduce the risk of entering into contracts with unreliable organisations.

#### New corruption reporting channels 2

New ways of anti-corruption communication, including anonymous chatbots, were put in place for the convenience of employees and partners.

#### Company-wide hotline 3

A single hotline is in place where an interested party can report an existing, suspected or planned fraud or corruption offence.

 For more details, see [the Company-Wide Hotline section below](#)