## COMPLIANCE SYSTEM ———

The IAS conducts staff surveys to identify any legal violations related to implementation of and compliance with the regulation. Compliance officers handle any complaints and decide how to respond. After the appropriate checks have been carried out, the results are discussed with management and reports are drawn up for the Audit Committee. Another of the IAS's duties is to monitor the implementation of measures that have been developed and approved to ensure compliance in the course of the Company's operations.

If a violation of the law is identified, the authorised official shall inform the appropriate Company bodies. If it is confirmed that a criminal or administrative offence has been committed, the information will be passed on to the law enforcement authorities. If a breach of the Code is not related to applicable law, the employee held accountable may be subject to sanctions such as disqualifying for bonuses or other incentives, withholding promotion or public sanctioning. The offender may also be subject to disciplinary action if appropriate legal grounds are identified.

## RISK MANAGEMENT AND INTERNAL CONTROL SYSTEM

In accordance with the Regulations on the Risk Management and Internal Control System (RM&ICS) and other internal documents, the Group established a system aimed at facilitating the Group's goals, in particular, the growth of financial stability and shareholder value, and improving the quality of corporate governance through the identification of risks, analysis of their materiality, and working out of their mitigation measures.

Supervisory level

IAS and its Head, as well as

other employees responsible for <u>the functioning of the RM&ICS</u>

The RM&ICS guarantees an impartial, fair, and transparent assessment of the Group's present situation and future prospects, the integrity and openness of reporting, the appropriateness and acceptability of risks taken. The Board of Directors takes the appropriate, required, and sufficient actions to guarantee that the present RM&ICS functions efficiently and adheres to the organisational principles and methodologies determined by the Board. All RM&ICS entities within their competence are responsible for compliance with risk management approaches and standards, as well as for proper fulfilment of control procedures in their focus areas.

For more details on risk management, see the Risk Management section of the Annual Report on p. 210

## Strategic level the Company's Board of Directors The strategic level approves the rules of establishment and functioning of the RM&ICS in the Company, ensures integration of this system into all organisational processes of the Company, including development of the Company's policies, strategic and business planning processes, as well as in the change management process. The Company's Board of Directors determines employee perceptions of the RM&ICS Operations level This level ensures the organisation of the operations and continuous monitoring of the effectiveness of the RM&ICS

At this level, specialists make sure that risk management control procedures and activities are followed and monitor their effectiveness

Structure of the RM&ICS