

PREVENTION OF CONFLICTS OF INTEREST

Rusagro Group is cautious about situations in which an employee loses or can lose loyalty and objectivity towards the Company or the performance of their job duties. The resulting conflict between personal interests and the interests of Rusagro Group has a negative impact on job performance, which is why the Company feels it has the right to safeguard itself against such conflicts. To prevent conflicts of interest, the Company does not engage in business relations with customers, suppliers, or competitors in any way other than in the course of carrying out business on Rusagro's behalf.

It is planned to include provisions on the prevention of conflicts of interest during the preparation of the Code of Business Conduct and Ethics. The Code of Business Conduct and Ethics will specify the need to inform direct management and the Compliance Officer of any instances of conflict of interest or risk of conflict of interest via appropriate communication channels.

The following situations are also defined by Rusagro Group as conflicts of interest:

- 1 Romantic or amorous relationship between managers and their subordinates
- 2 Family relationships (close or distant) with another employee of the Company or the employee of a customer, supplier, or competitor
- 3 Spousal relationships (including former spousal relationships) with another employee of the Company or the employee of a customer, supplier, or competitor
- 4 Joint participation with another employee in a commercial enterprise, joint membership in religious or other non-profit organisations

INSIDER INFORMATION

As a public company, Rusagro Group has extensive responsibilities on establishing and observing a special procedure for the disclosure of information that can materially affect the value of the Company's securities.

Since 2011, the Company has had the List of Insider Information in place that applies to all Company employees and members of the Board of Directors. The Company plans to bring the internal document that regulate the handling of insider information in line with the latest changes in the Company's corporate governance and global best practices in this area. There are plans to develop and adopt a Code of Conduct on Insider Information.

With the Code of Conduct on Insider Information in place, the Company intends to ensure that all securities market participants have equal access to sensitive information in an effort to prevent misuse of insider information – information that could affect the value of the Company's securities.

As expected, it is planned to include the obligation of employees to abide by international acts on the use and disclosure of insider information in addition to the Code of Conduct on Insider Information.



The list of insider information is available on the website of the Corporate Information Disclosure Centre (e-disclosure)