

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

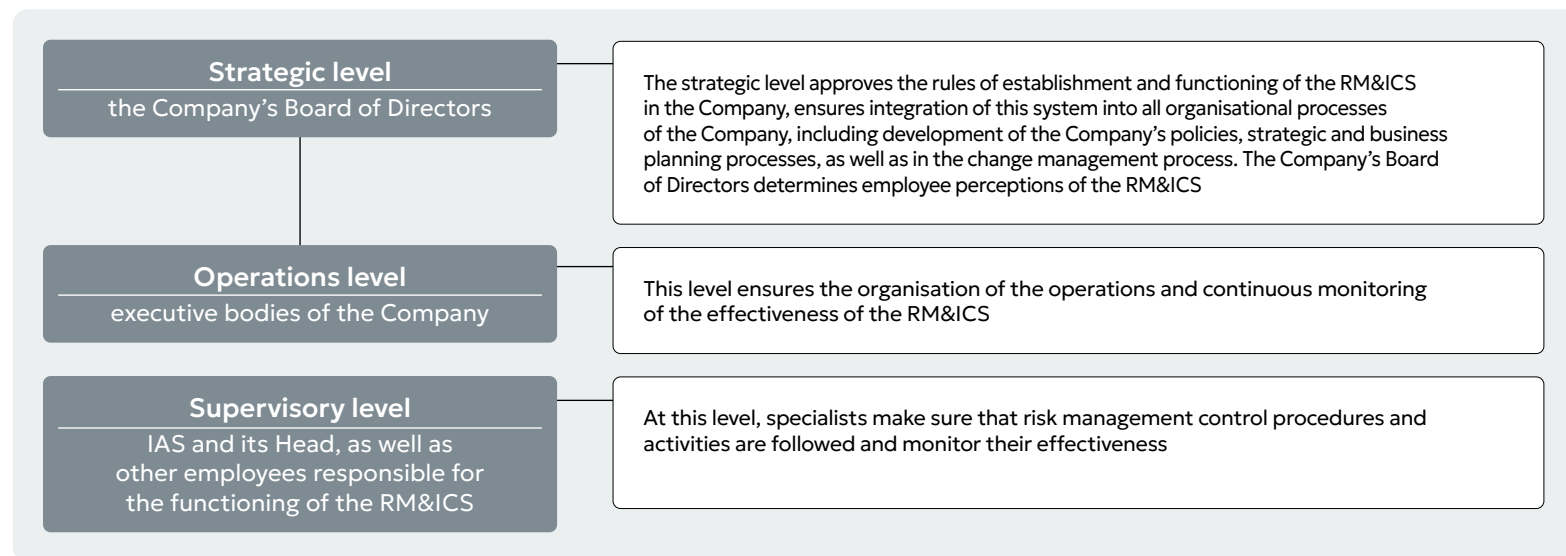
In accordance with the Regulations on the Risk Management and Internal Control System (RM&ICS) and other internal documents, the Group established a system aimed at facilitating the Group's goals, in particular, the growth of financial stability and shareholder value, and improving the quality of corporate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

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](#)

Structure of the RM&ICS



Focus areas of the RM&ICS

Risk management

Timely identification, analysis, assessment and minimisation of risks, including development of criteria for their assessment, control over the risk management process and provision of consolidated reporting.

Integration into business processes

Introduction of risk management into business processes, distribution of responsibility between internal control subjects and development of risk mitigation mechanisms in the Company's projects.

Control procedures

Development, optimisation and automation of control procedures, prevention of fraud and conflict of interest, and due diligence of counterparties.

Evaluation and development of the RM&ICS

Generation of system development plans, their annual performance report and proposals for improvement.

Information systems and reporting

Cleation of systems to collect and analyse data, accurate and transparent reporting, compliance with legislation and disclosure of information to strengthen the investment case.

