

- Anti-Corruption Policy;
- Anti-Corruption Programme (available to all TransContainer's employees on its corporate website);
- Regulation on Insider Information;
- Revised Regulation on the Procedure for Addressing Conflict (or Potential Conflict) of Interest at TransContainer (available to all TransContainer's employees on its corporate website).

Applicable to all TransContainer's employees and officers, these documents determine the rules and principles of managing a conflict of interest, including the employee obligation to disclose information on an existing or potential conflict of interest, balancing the interests of the Company and its employees, and non-retaliation for reporting a conflict of interest.

In accordance with internal documents, members of the Board of Directors and the Executive Board had no conflicts of interest in the reporting period.

Combating Corruption

Based on the high ethical standards of behaviour adopted by the Company, TransContainer fully shares the approach to pursuing zero tolerance to any form of corruption.

TransContainer is a member of the Anti-Corruption Charter of the Russian Business. Participation in the Charter and consistent implementation of its provisions bear witness that the Company has adopted appropriate measures to prevent corruption, which, pursuant to the requirements of Art. 13.3 of the Federal Law No. 273-FZ dated 25 December 2008 On Combating Corruption, shall be taken by any organisation.

TransContainer does not tolerate any actions that are directly or indirectly associated with the offering, giving, promising, soliciting or receiving bribes, assisting in bribery, and any payments seeking to facilitate administrative, bureaucratic and other formalities made in any form by or to any persons/organisations, including government officials, public organisations, private companies, and political figures. This standing is confirmed by the CEO's anti-corruption statement on the Company's corporate website proclaiming zero tolerance to any form of corruption.

The Company has in place and regularly conducts training of its employees in anti-corruption and corporate fraud. All newly published and amended regulatory documents are communicated to all employees via e-mail and by placing them in the relevant sections of the corporate website.

In accordance with the Anti-Corruption Programme at TransContainer approved by the decision of the Company's Executive Board¹, the Company set up a working group to develop anti-corruption, anti-fraud, and anti-embezzlement measures².

TransContainer's anti-corruption activities are governed by the following internal documents:

- TransContainer's Anti-Corruption Policy³;
- The list of functions, which are most sensitive to corruption, corporate fraud, and embezzlement⁴;
- The Register of Corruption Risks and the List of Positions Related to Corruption Risks⁵.

Extension of Anti-corruption Activities in 2018

The Risk Committee agreed on the Register of Corruption Risks and included the risk group "corruption risks: conflict of interests, insider trading, bribery, commercial bribery" in the corporate risk map for 2018⁶.

The Regulation on the Procedure for Addressing Conflict (or Potential Conflict) of Interest at TransContainer⁷ was revised.

Stop Corruption Hotline Activities

There is a special hotline (anticorr@trcont.ru) on the Company's intranet site and the Stop Corruption hotline on the corporate website. Complaints received through both lines are sent as e-mails to heads of the Economic Security Department and the Internal Audit Service.

In 2018, 357 complaints were registered, 176 calls of them were made to the hotline (anticorr@trcont.ru), 155 - to the call centre, and 26 - to director@trcont.ru e-mail. All the facts mentioned in the complaints were reviewed, 22 situations were closely and comprehensively addressed.

1. Approved on 23 December 2016 (Minutes No. 34)

2. CEO order No. 87 dated 4 April 2017

3. Minutes No. 43 of TransContainer's Executive Board dated 16 May 2017.

4. CEO order No. 52 dated 9 March 2017.

5. Minutes No. 1 dated 24 August 2017.

6. Minutes No. 6 dated 17 November 2017.

7. Approved by Order No. 182 dated 18 July 2018.