

## Governance structure

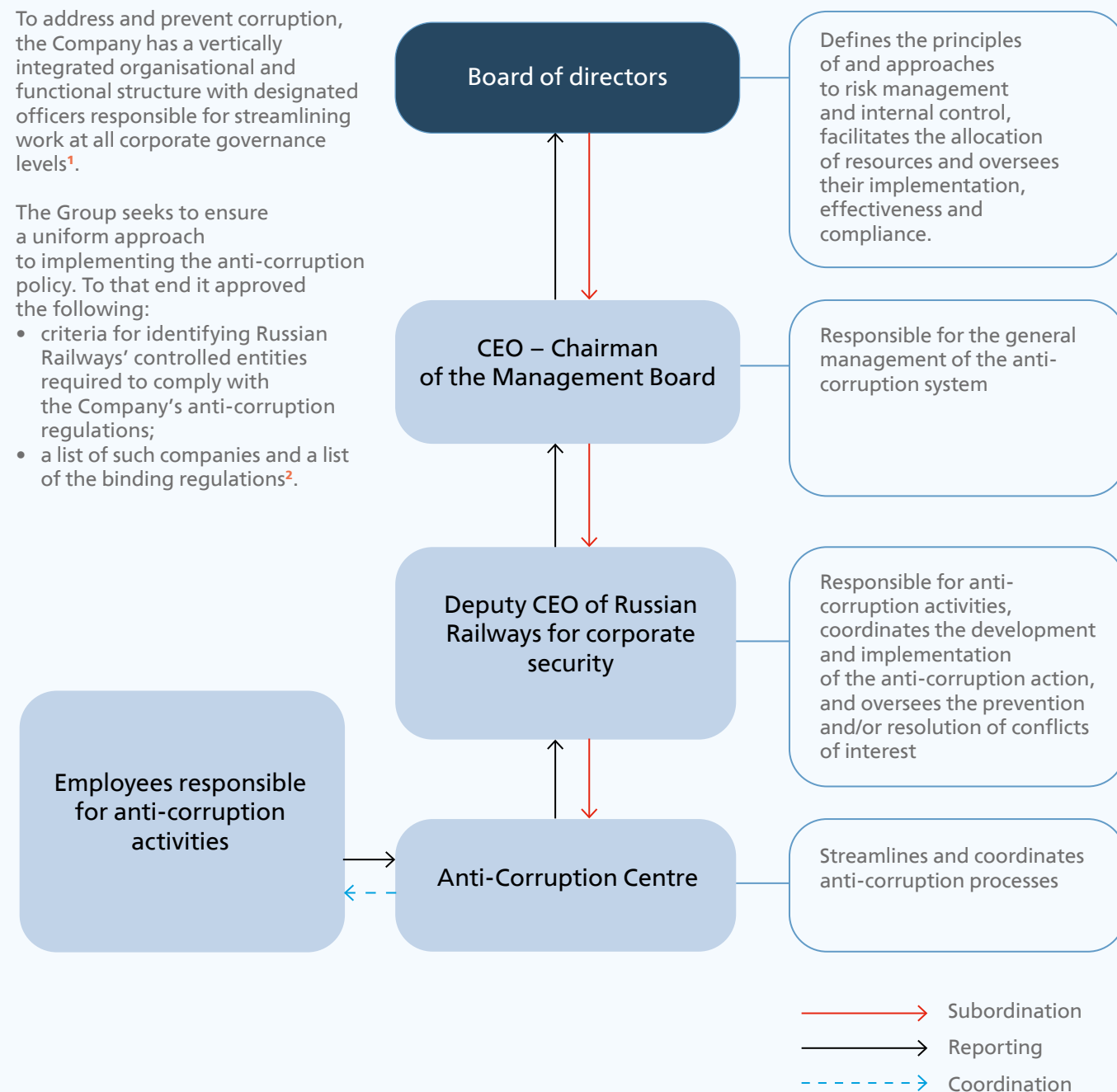
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To address and prevent corruption, the Company has a vertically integrated organisational and functional structure with designated officers responsible for streamlining work at all corporate governance levels<sup>1</sup>.

The Group seeks to ensure a uniform approach to implementing the anti-corruption policy. To that end it approved the following:

- criteria for identifying Russian Railways' controlled entities required to comply with the Company's anti-corruption regulations;
- a list of such companies and a list of the binding regulations<sup>2</sup>.

### Governance structure



<sup>1</sup> Russian Railways' Order No. 2051/r dated 16 September 2019.

<sup>2</sup> Russian Railways' Order No. 2063/r dated 22 September 2021.

## Russian Railways' Anti-Corruption Action Plan

Russian Railways' Anti-Corruption Action Plan approved for the relevant period in accordance with the National Anti-Corruption Plan<sup>1</sup> and the respective Instructions of the Russian Government provides a legal and organisational framework for the Company's anti-corruption action.



### Key focus areas of Russian Railways' Anti-Corruption Action Plan for 2021–2024<sup>2</sup>:

- corruption risk management;
- prevention and resolution of conflicts of interest;
- reporting any inducement to corruption to the employer;
- reporting receipt of gifts by an employee;
- anti-corruption compliance in real estate management;
- engagement with law enforcement agencies;
- analysis of anti-corruption measures in procurement;
- expert review of draft contracts to identify and eliminate corruption risks;
- assessment of RMICS from an anti-corruption perspective;
- Anti-Corruption Hotline;
- anti-corruption awareness raising;
- staff training and development;
- improvement of digital technologies in anti-corruption activities;
- social surveys on anti-corruption.

In 2023, Russian Railways fully implemented the anti-corruption action plan for the reporting period, focusing on managing corruption risks and conflicts of interest and making its educational, awareness raising and other anti-corruption initiatives more efficient.

<sup>1</sup> Approved by the Russian President's Decree No. 478 dated 16 August 2021.

<sup>2</sup> Russian Railways' Order No. 2106/r dated 28 September 2021.