

Anti-Corruption Hotline

GRI 205-3

The Company has a whistleblowing hotline in place to report corruption in the Russian Railways Group, including anonymously. The contact channels are available in the Anti-Corruption section of Russian Railways' website.

The Anti-Corruption Hotline is open 24/7 and has a voicemail service. The Anti-Corruption Centre, Russian Railways' structural unit, receives and processes the incoming reports. At the end of each quarter, information on investigation results and actions taken is submitted to Russian Railways' Deputy CEO for corporate security.

In 2023, we received 378 reports, down 5% against the previous year, 212 of which (56%) were on suspected offences. Investigations proved 25 reports (12%) to be true.

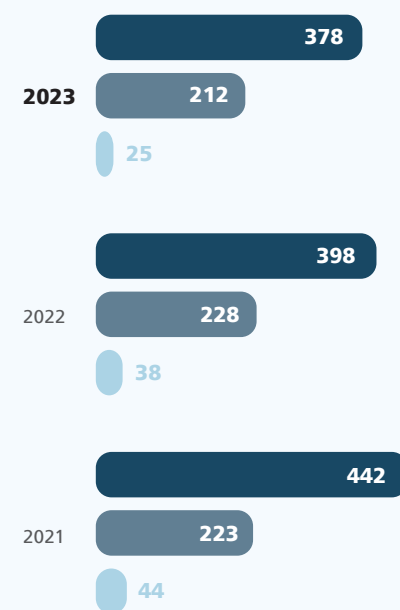
The findings of investigations into the received reports are considered in the management of corruption risks and are escalated to the heads of business units to perform relevant preventive initiatives.

Following the investigation of complaints received through the Anti-Corruption Hotline, the Company took disciplinary action (reprimands) against six employees and dismissed five employees, with materials on seven reports forwarded to law enforcement agencies.

In accordance with Russian Railways' Code of Business Ethics and the Company's anti-corruption policy, we ensure confidentiality and protect whistleblowers from negative consequences arising from their reports of potential corruption in the Company.

212
corruption violations reported in 2023

Number of complaints



- Total complaints received
- Reported corruption violations
- Confirmed violations



[Anti-Corruption Hotline](#)

Reports can be submitted in the following way:

- via the virtual reception desk on the Company's official website (Corruption to be chosen as the topic)
- via e-mail anticorruption@center.rzd.ru;
- by mail at: 2/1 Novaya Basmannaya St., Bld. 1, Moscow 107174, Anti-Corruption Centre, Russian Railways' structural unit
- by phone 8 (800) 775-65-66

Zero tolerance for corruption

GRI 205-2

Staff training

Russian Railways' centralised system of mandatory anti-corruption training is one of the key instruments for fostering responsible conduct culture. Pursuant to Russian Railways' regulations anti-corruption training has become mandatory for all of the Company's employees since 2019, as they have to complete relevant courses within one month of their employment date. Refresher training is required every three years.

In 2023, over 106,000 employees (up 32% compared to 2022) completed relevant training on Russian Railways' distance learning platform, including more than 94,000 people who took the general course and more than 11,000 people who took a special course geared towards executives and employees whose responsibilities included anti-corruption activities.

Furthermore, 429 employees responsible for overseeing anti-corruption efforts received advanced training at the Institute of Legal

Studies at MIIT (Russian University of Transport) in line with the 2023 centralised plan for the training and development of Russian Railways managers and office employees.

All new hires are required to read and sign Russian Railways' Code of Business Ethics, anti-corruption policy and other internal anti-corruption regulations when accepting employment and to get acquainted with any amendments thereto by reading and signing them in a hardcopy, digital¹ or electronic format.

Anti-corruption promotion programme

GRI 205-2

As a result of running the Comprehensive Anti-Corruption Promotion Programme in 2021–2023², the Company developed a platform for raising employee awareness about anti-corruption issues. We paid special attention to educating employees, promoting ethical values, supporting young activist movements and cooperating with controlled entities on combating and preventing corruption.

To raise employee awareness the Company distributed anti-corruption infographics. Our corporate media featured news, interviews and other materials on anti-corruption compliance, and RZD TV broadcast themed videos and satirical articles.

The Group's quarterly almanac Anticorr, a dedicated blog on the Employee Service Portal,

and associated Anticorr channels on Telegram and Rutube have all focused on anti-corruption efforts.



¹ Via the single automated document management system.
² Approved on 24 December 2020 (Minutes No. 1955).

> **1,000**
anti-corruption materials
and 42 relevant videos
released in the corporate
media

200 articles
posted on social
media

4 issues
of the Anticorr digital
almanac distributed to the
Company's business units

We are witnessing the expansion of membership in Anticorr, a voluntary union of the Russian Railways Group employees fostering a culture of zero tolerance to corruption among the Group's teams. The community regularly discusses draft anti-corruption promotion materials and tests some of them on site. On top of that, intellectual anti-corruption volunteering is gaining traction among young employees.

More than 200 authors, including the Company's employees and representatives of educational organisations affiliated with Russian Railways, took part in the Railway Worker's Honour anti-corruption social advertising contest.

In 2023, the Company conducted a survey to explore how Russian Railways' employees perceive its anti-corruption activities. The survey revealed that the majority of respondents (83%) knew how

to deal with attempts at engaging them in corrupt activities. This indicator remained flat compared to 2022.

To make its anti-corruption activities open and transparent, the Company publishes all anti-corruption regulations, rules, guidelines, and information in the Anti-corruption section of its website. The Company's employees can also access these materials from their personal accounts on the Employee Service Portal.



[Anti-corruption at Russian Railways website](#)

Anti-Corruption Rating of Russian Business



Seeking independent due diligence, the Company took part in the Anti-Corruption Rating of Russian Business awarded by the Russian Union of Industrialists and Entrepreneurs based on compliance with the ISO 37001:2016 international anti-corruption standard (Anti-bribery management systems – Requirements with guidance for use) and the provisions of the Russian Anti-Corruption Charter for Business.

In 2023, Russian Railways and three of its controlled entities earned the highest (AAA+) classification in this rating as a company upholding the strongest anti-corruption standards. The Company also received a special award for the Leadership in Promoting Anti-Corruption Principles in Russian Business.

Responsible tax policy

GRI 207-1

As a systemically important company, a large employer and a major taxpayer, Russian Railways is a key contributor to Russia's social and economic progress. We are aware of our responsibility towards the government and society, and are committed to fulfilling our tax liabilities in good faith.

Russian Railways pays all applicable taxes, insurance contributions, levies and charges required by the Russian laws, including VAT, corporate income, property, land, and transportation taxes, insurance fees, MET and others.

The Company adopted the Declaration on Tax Strategy Objectives and Principles (tax strategy)¹, which is in line with the Russian Railways Group's values, mission, strategic priorities, and growth targets.

Higher tax transparency.

The Company takes measures to enhance tax transparency, including through tax monitoring to ensure accurate calculation and timely payment of taxes, levies and insurance fees.

Tax risk management.

The Company uses a comprehensive system to identify and manage tax risks.

Consistency of tax accounting methodology.

Russian Railways develops and sticks to uniform approaches to taxation to ensure the consistency of tax accounting and fair presentation of taxes in its reporting. The Company mitigates tax risks among other things by requesting clarifications from relevant government agencies and reasoned opinions of tax authorities as part of tax monitoring.

In its tax strategy, the Company relies on the following principles:

Taxpayer's good faith.

The Company complies with all tax laws and pays all applicable taxes and levies on time and in full, as well as files tax returns and other documents in a timely manner.

Tax disclosure.

We disclose tax information in accordance with the laws of our countries of operation and international treaties.



¹ Approved by Russian Railways' Order No. 1309/r dated 15 June 2021