

APPROVED BY  
Decision of the Board of Directors  
of PJSC “Aeroflot”  
Minutes No.10 dated 28.01.2016

# **PJSC “Aeroflot” Code of Corporate Ethics**

Type of document:	Operating instructions	
Valid as of:	Dates of approval	
Drafted by:	Director, People Development Department	Telephone: +7(499)5006800, extension 7318 e-mail: dkarasev@aeroflot.ru

**DOCUMENT HISTORY RECORD**

Document Status (Basic/ Revised/ Cancelled)	Document Revision	Effective date/Cancella tion date	Comments
Basic			Replacement of PJSC “Aeroflot” Code of Corporate Ethics RI-GD- 201A approved by the Board (Minutes No.1 dated 12.01.2015)

**DOCUMENT VERIFICATION DATE**

Entry number in order	Date of Entry	Extension/ Revision/ Cancellation	Entry Maker Position	Signature	Initials, surname

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## 1. GENERAL PROVISIONS

### 1.1. Introduction

1.1.1. The Code of Corporate Ethics of PJSC “Aeroflot” (hereinafter referred to as “Code”) is a code of ethics, moral norms and rules of conduct approved and shared by the members of the Board of Directors and PJSC “Aeroflot” employees regardless of their positions.

1.1.2. This Code is developed based on the current legislation of the Russian Federation, the Corporate Governance Code approved by the Board of Directors of the Bank of Russia on 21.03.2014, the provisions of the Charter and regulatory documents of PJSC “Aeroflot”, as well as the generally accepted standards of corporate and business ethics and experience of the best Russian and international practices of corporate governance.

### 1.2. Terms and Definitions

The present Code shall use the following terms:

- 1) **Aeroflot Group** – PJSC “Aeroflot” and its controlled organizations;
- 2) **business partners** – individuals and legal entities, who/which have entered into or are in the process of entering into contractual or non-contractual business relations with PJSC “Aeroflot”;
- 3) **stakeholders** – individuals and legal entities, who/which influence the activities of PJSC “Aeroflot” or are subject to the direct or indirect influence on its part, including shareholders, investors, customers, business partners, employees, as well as governmental and regional authorities, local communities, etc.;
- 4) **conflict of interest** – a situation where the personal benefit (direct or indirect) of a member of the Board of PJSC “Aeroflot” or an employee of PJSC “Aeroflot” is in conflict with the rights and legitimate interest of PJSC “Aeroflot”, which affects or may affect a proper, non-prejudicial and unbiased performance of his/her official duties (exercise of powers), or to the detriment of the legitimate interests and/or goodwill of PJSC “Aeroflot”;
- 5) **corruption** – abuse of official position, bribe-taking, bribe-giving, abuse of powers, graft or other illegal use by an individual of his/her official position or status regardless of the legitimate interests of society and the state in order to obtain benefits in the form of money, valuables and other property or property related services, other property interests for himself/herself or for third parties, or illegal provision of such benefits to a specific person by other individuals;
- 6) **controlled organizations** – a legal entity under direct or indirect control of PJSC “Aeroflot”;
- 7) **employees** – individuals employed by PJSC “Aeroflot”, executives included;
- 8) **company’s resources** – funds, property, opportunities, company inventories, sources of income that ensure a stable operation of and profits for PJSC “Aeroflot”;
- 9) **executives** – General Director, First Deputy General Director for Aviation Security, Deputy General Directors, Chief Accountant, heads of business units of PJSC “Aeroflot”, and interim officers;

### **1.3. Goals and Objectives**

1.3.1. The goals of the Code are as follows:

identification and reinforcement of key values, principles, ethical standards and rules of conduct applied in their activities by members of the Board of Directors of PJSC “Aeroflot” and employees of PJSC “Aeroflot”, and which target to improve profitability, successfulness and efficiency of the company;

creation of a sustainable corporate culture, confirmation of ever present readiness of PJSC “Aeroflot” to follow the highest standards of business conduct both within the company and in its relations with third parties;

reinforcement of general principles in order to prevent possible conflicts of interest, detection and prevention of any abuse;

maintenance and improvement of PJSC “Aeroflot” credibility for customers, strengthening the company’s goodwill as an honest and reliable partner.

1.3.2. The objectives of the Code are as follows:

definition of basics for PJSC “Aeroflot” relations with all stakeholders;

prevention of conflicts of interest, to reveal them and to make an effective settlement;

ensure that internal corporate standards are understood and applied by PJSC “Aeroflot” employees in their usual work activities.

### **1.4. Code Scope**

1.4.1. The provisions of the present Code shall apply to all employees regardless of their position, as well as to the members of the Board of Directors of PJSC “Aeroflot”.

1.4.2. All of the above-mentioned persons must read and understand the Code and adhere to the principles and rules stipulated therein.

1.4.3. The present Code shall be the basis for business conduct for all companies of the Aeroflot Group. The boards of directors of controlled organizations of PJSC “Aeroflot” may accept their own codes of corporate ethics not in contradiction to the provisions of the present Code.

## **2. COMPANY MISSION AND VALUES**

### **2.1. Company Mission**

2.1.1. PJSC “Aeroflot” operates to ensure that customers can quickly and comfortably travel great distances, and thus be mobile, meet more often, work successfully and see the world in all its diversity.

2.1.2. PJSC “Aeroflot” gives its customers a choice through an extensive route network and various air carriers within the Aeroflot Group, from low costs to premium class airlines.

2.1.3. The main objective of PJSC “Aeroflot” is to remain the undisputed leader in domestic and international air transport and to number among the best airlines in the world, combining dynamic development and high reliability with quality of service.

### **2.2. Company Values**

2.2.1. Customer Trust:

The customer is always the focus of PJSC “Aeroflot”. Customers’ choice determines the success of the company. Giving preferences to PJSC “Aeroflot”, customers enable the company to grow and prosper. In turn, PJSC “Aeroflot” guarantees its customers faultless safety and high quality service and at all stages of air travel;

PJSC “Aeroflot” strives to exceed customer expectations and do everything possible to ensure that customers come back again and again.

#### 2.2.2. Results for Shareholders:

PJSC “Aeroflot” aims at achieving sustainable and dynamic growth, increasing corporate value and providing stable income for shareholders;

The company is committed to high standards of corporate governance and business ethics;

PJSC “Aeroflot” is a company with transparent reporting, which is always open and accessible to its business partners and shareholders.

#### 2.2.3. Teamwork:

PJSC “Aeroflot” employees are a tightly knit team of professionals who are always open to innovations, initiatives and new knowledge in order to develop and move forward;

Employees respect their colleagues and are ready for constructive dialogue in order to achieve results;

PJSC “Aeroflot” provides a stable working environment with equal opportunities to for learning and personal growth of its employees.

#### 2.2.4. Social Responsibility:

Aware of its responsibility to society, PJSC “Aeroflot”:

takes care of the environment and continuously improves energy and environmental efficiency using a modern and young fleet of aircraft and the most advanced technology;

is actively involved in socially significant and charitable projects;

develops the air transport network in Russia and creates new jobs in the regions;

supports and actively participates in the development of the Russian aircraft industry.

### **3. STANDARDS FOR INTERNAL CORPORATE CONDUCT AND ETHICS**

#### **3.1. Employer-Employee Relationship**

3.1.1. PJSC “Aeroflot” employees are a major competitive advantage of the company. Our employer-employee relationship is based on trust, mutual respect and cooperation.

3.1.2. PJSC “Aeroflot” values in its employees:

their competence - professionalism, competence in neighbouring areas and the ability to build relationships with partners and colleagues;

their involvement - sincere concern about the company’s success, a feel of attachment to a common goal and aspiration to do the job as good as possible for the benefit of the company and its customers;

their initiative - capability to propose new approaches and ideas, aspiration for self-improvement, capability and readiness to upgrade skills by himself/herself, a creative approach to work, activity and independence of thought, readiness and ability to take responsibility;

their personal qualities - honesty, integrity, sincerity, amicability towards colleagues, high personal culture and self-discipline, understanding of the specifics of the company and capability to keep information confidential;

their loyalty to the company - loyalty and dedication to the goals and values of the company, achievement of set goals, contribution to build a cohesive team spirit, and willingness to support and help.

3.1.3. The company’s responsibility before its employees covers:

provision of comfortable and safe working conditions in compliance with current legislation and an adequate level of occupational health and safety;

provision of a remuneration system to reward work aimed at attracting, motivating and preserving highly skilled employees, implementation of advanced techniques for the analysis of deliverables, which allows the company to minimize subjective and unjustified assessments;

conducting regular fair assessments of the results and quality of employees’ activity, using the results to make decisions on raising wages, encouragement and provision of additional benefits and advantages, creation of a candidate pool and offering career opportunities to employees;

supporting proactivity and willingness of employees to acquire new knowledge, improve professional skills, and develop new forms of work organization;

implementing a social policy aimed at increasing the prestige to work at the company, caring about the health and well-being of employees and their families.

3.1.4. PJSC “Aeroflot” respects the fundamental rights and freedoms of its employees, provides for equal opportunities and guarantees protection against all forms of discrimination, as defined by applicable legislation of the Russian Federation and international law. The company prohibits any preferences with regard to political, religious, national and other similar motives in the implementation of personnel policy, wage policy and social benefits. In cases of discrimination, an employee has the right to speak to his/her line manager or the People Development Department. Confidentiality in such cases is guaranteed.

3.1.5. PJSC “Aeroflot” does not prevent its employees from participating in social, religious and political life. Such participation and related financial and time expenditures are entirely voluntary and should not interfere with the activities of the employees in the company.

3.1.6. The mutual responsibility of PJSC “Aeroflot” employees is expressed through:  
performance of official duties in good faith and discharge of personal responsibility for their work results;

compliance with labour discipline, labour safety rules, execution of commands, instructions and orders issued by PJSC “Aeroflot” executives;

respectful and tactful attitude towards colleagues, executives and subordinates;

prudent usage of PJSC “Aeroflot” property, to employee’s own working time and working time of other employees;

acceptance of constructive criticism;

intolerance towards any signs of corruption;

improvement of their professional knowledge and skills;

caring about the PJSC “Aeroflot” goodwill;

adherence to corporate ethics rules established by the present Code.

3.1.7. PJSC “Aeroflot” executives shall serve as personal examples of ethical conduct and shall be guided by the following principles:

unconditional respect for the individual;

compliance with applicable laws and regulatory documents of PJSC “Aeroflot”;

respect to someone’s opinion;

intolerance to any form of discrimination against subordinate employees;

strict monitoring of compliance with occupational safety rules;

non-participation in any corruption schemes both by themselves and their subordinate employees;

knowledge and practical application of the provisions and rules of the present Code.

3.1.8. Executives undertake not to manipulate the company’s performance reporting data and do not participate in any other fraud in order to achieve formalistic goals by PJSC ‘Aeroflot’, committed to the detriment of long-term interests of its shareholders. In case of disclosure of such facts the funds illegally obtained by PJSC “Aeroflot” executives must be voluntarily and completely returned to the company as soon as possible without any legal claims. Relevant responsibilities are specified in labour contracts concluded with executives of PJSC “Aeroflot”.



### 3.2. Corporate Image

3.2.1. PJSC “Aeroflot” devotes great attention to its corporate image made of the elements such as business conduct and the dress code of its employees.

3.2.2. Business conduct rules do not allow the Company employees to:

make public statements, judgments and/or evaluations, including the ones in the mass media (as well as, but not limited to the Internet), with respect to activities of business units of PJSC “Aeroflot”, executives, including, but not limited to decisions and/or actions of superior officers, if it involves the disclosure of secrets protected by law. Any statements with respect to PJSC “Aeroflot” shall be expressed by employees in a strictly regulated procedure and (or) by persons indicated in this procedure;

use drugs or be at work under the influence of drugs or any other toxic substances (in the workplace, at company premises or facilities, where the employee must perform work functions as instructed by PJSC “Aeroflot”);

use alcohol or be at work under the influence of alcohol (in the workplace, at company premises or facilities, where the employee must perform work functions as instructed by PJSC “Aeroflot”), except in cases of special events;

smoke outside designated areas;

express aggressive, humiliating, hostile or intimidating actions, deeds or behaviour;

distribute indecent materials, including pictures;

use PJSC “Aeroflot” resources for personal purposes;

participate in conflicts of various organizations involved in improper activities, which may discredit employees and the company or cause a conflict of interest or direct or indirect damage to PJSC “Aeroflot”;

receive cash or other gifts offered by third parties to influence the decision-making process during performance of employee’s official duties.

3.2.3. The dress code represents a specific element of corporate culture, the PJSC “Aeroflot” goodwill and a specific occupation that creates a guaranteed good impression and inspires confidence in PJSC “Aeroflot”.

3.2.4. Office employees should display neat and tidy appearance. They should wear strict business-style clothes, preferably conservative classic; sportswear is unacceptable. On the last day of the working week office employees may wear casual clothes unless official events or negotiations in person with business partners have been scheduled.

3.2.5. Wearing uniforms and maintenance of a positive corporate image of employees directly engaged in servicing passengers and customers of PJSC “Aeroflot” is regulated by the Rules for Wearing Uniform and employee’s image.

### 3.3. Conflict of Interest

3.3.1. Members of the Board of Directors of PJSC “Aeroflot” and employees of PJSC “Aeroflot” must act in the interests of the company and take measures to avoid situations in which a conflict of interest may arise.

3.3.2. In order to avoid conflict situations, employees shall:

exclude any possible actions under the influence of personal proprietary or other interests that may prevent from the conscientious performance of official duties;

respect the standards of professional ethics and rules of business conduct;

have no personal proprietary or financial interest in the activities of a business partner with whom they interact during the performance of their official duties, comply with the rules of common standard policy for the company’s business partners established by PJSC “Aeroflot”;

decline gifts, personal offers in the form of money, tickets to entertainment or sporting events, paid holidays, etc., which are related to the performance of official duties. Actions of this kind may be regarded by others as acceptance on the part of PJSC “Aeroflot”



of a specific obligation and may involve the employee in a conflict of interest. This rule shall not apply to the exchange of advertising souvenirs commonly accepted in business relationships and to conducting business meetings in restaurants, where each party pays for its own expenses;

be permitted to conduct other business activities or work for more than one employer if such activities do not interfere with proper performance of their official duties at PJSC “Aeroflot”;

disclose information about activities, which may take a considerable amount of time or distract from the direct execution of official duties or otherwise adversely affect their duties and functions at PJSC “Aeroflot”;

if the spouse or a close relative works for the company that is a business partner of PJSC “Aeroflot”, refrain from taking decisions related to business relationships with the said company, and not discuss with a relative working in a partner company any issues related to the cooperation of PJSC “Aeroflot” with the said company.

3.3.3. In case of a conflict of interest or possibility of a conflict of interest, employees must notify their immediate superior seeking to mutually find the best solution without compromising the interests of the parties.

In case of a conflict of interest or possibility of a conflict of interest, the First Deputy General Director for Aviation Security, the Deputy General Directors and the Chief Accountant shall notify the General Director in writing in accordance with the Procedure for Notification of the Employer about the Existence of a Personal Proprietary Interest, which leads to or may lead to a conflict of interest (RI-GD-273H).

In case of a conflict of interest or possibility of a conflict of interest, the General Director of PJSC “Aeroflot” shall notify the Chairman of the Board of Directors of PJSC “Aeroflot” in writing in accordance with the Procedure for Notification of the Employer about the Existence of a Personal Proprietary Interest, which leads to or may lead to a conflict of interest (RI-GD-273H).

3.3.4. In case of a conflict of interest between an employee and PJSC “Aeroflot” and failure to resolve this conflict of interest, priority shall be given to the interests of PJSC “Aeroflot”.

3.3.5. In order to prevent conflicts of interest, the members of the Board of Directors of PJSC “Aeroflot” shall:

notify the Board of Directors of PJSC “Aeroflot” in writing about potential conflict of interest of a member of the Board of Directors of PJSC “Aeroflot”, including the case when there is an interest in making a deal by the company, and in any case put the interests of PJSC “Aeroflot” above his/her own interests;

refrain from any actions that will or may potentially lead to a conflict between their interests and the interests of PJSC “Aeroflot”;

if a member of the Board of Directors of PJSC “Aeroflot” is involved in a conflict of interest, report this fact and the reason for it to the Board of Directors of PJSC “Aeroflot” through the Chairman or the Executive Secretary of the Board of Directors of PJSC “Aeroflot”. This notification in any case must be submitted in written form before the matter is discussed at a meeting of the Board of Directors or its committee with the participation of the said member of the Board of Directors of PJSC “Aeroflot”;

abstain from voting on matters in respect of which a member of the Board of Directors of PJSC “Aeroflot” has a conflict of interest, and not attend any meeting of the Board of Directors of PJSC “Aeroflot” during discussions of this matter, when it is so required by the specifics of the matter or the conflict of interest.

3.3.6. Members of the Board of Directors of PJSC “Aeroflot” and related persons shall not accept gifts from parties interested in decision making by the Board of Directors of PJSC “Aeroflot” or enjoy any other direct or indirect benefits provided by such persons

(except for symbolic tokens of high esteem in accordance with generally accepted rules of courtesy, or souvenirs distributed during official events).

### **3.4. Protection of Company Property and Resources**

3.4.1. Property and resources belonging to PJSC “Aeroflot” represent the basis of its activity, growth and long-term development. Preserving the property and resources and ensuring their rational use is a guarantee of the effectiveness of PJSC “Aeroflot”. Using the property and resources of the company is acceptable for business purposes only and as part of official duties execution.

3.4.2. Company employees shall treat company property with due care and ensure its safety, strictly comply with the instructions for handling equipment, and protect intellectual activity results and means of identification of PJSC “Aeroflot”.

### **3.5. Confidential and Insider Information**

3.5.1. Members of the Board of Directors of PJSC “Aeroflot” and employees of PJSC “Aeroflot”, who have access to confidential and/or insider information of the company, shall only use it for performance of their duties and only in the interests of Aeroflot, and simultaneously comply with the procedure for use and protection of confidential and insider information stipulated in the Corporate Information Policy Regulation (RI-GD-239X), the Confidential Information Regulation (RI-GD-170H), the Insider Information Access Regulation (RI-GD-132H) and other regulatory documents of PJSC “Aeroflot”.

3.5.2. The above-mentioned persons are not allowed to disclose any confidential or insider information (even after the termination of employment or any other contract with the company), transfer it to third parties or use it for their own benefit without the consent of PJSC “Aeroflot”, unless otherwise provided by law or through a reasonable request issued by authorized state authorities or other executive bodies.

### **3.6. Anti-Corruption Measures**

3.6.1. As a company that joined the Anti-Corruption Charter of Russian Business, PJSC “Aeroflot” implements an anti-corruption policy targeted at elimination of any possibility for any kind of corruption within PJSC “Aeroflot” to emerge.

3.6.2. PJSC “Aeroflot” has created and improves legal corruption prevention mechanisms, has developed a system of interrelated principles, procedures and specific measures aimed at preventing and combating corruption. Employees must strictly comply with the requirements and restrictions defined by current legislation on combating corruption and follow the anti-corruption rules specified in PJSC “Aeroflot” regulative documents, and in particular comply with the Procedure for informing the PJSC “Aeroflot” executives about any inducement of PJSC “Aeroflot” employees to commit corruption offenses (RI-GD-272H).

3.6.3. PJSC “Aeroflot” rejects all forms and manifestations of corruption itself and in cooperation with business partners, government representatives, political parties and other persons.

## **4. STANDARDS FOR EXTERNAL CORPORATE CONDUCT AND ETHICS**

### **4.1. Customer Relations**

4.1.1. Passengers are main customers of PJSC “Aeroflot”.

The Company consistently maintains high quality, economic attractiveness and competitiveness of services rendered to customers, which allows it to be successful in the air carriage market.

4.1.2. PJSC “Aeroflot” priority remains flight comfort and safety in any situation.

All activities of PJSC “Aeroflot” are directed to continuous improvement of management, technology and processes ensuring unconditional flight safety. The company’s current safety concept imposes the most stringent requirements, in line with international standards, for the preparation and operation of flights.

4.1.3. Amicability, attentiveness and smiling represent a brand style of PJSC “Aeroflot” passenger service.

The company always shows deference and respects all people equally and without distinction. Negative attitudes, actions and discriminatory statements are unacceptable.

PJSC “Aeroflot” gives additional attention to passengers with special needs (the persons with disabilities, elderly persons, parents with infants, etc.).

4.1.4. All information provided to passengers is complete, true and excludes any possibility of fraud or deliberate misleading.

PJSC “Aeroflot” respects privacy rights of its passengers and strictly complies with the requirements of Russian and international legislation on the protection of personal data.

4.1.5. The company gives great attention to maintain an ongoing dialogue with customers, get feedback from them for regular monitoring of their satisfaction level and provide a timely response to problem situations.

## **4.2. Relations with Shareholders and Investors**

4.2.1. PJSC “Aeroflot” implements a uniform and consistent policy in its mutual relations with shareholders and investors, which basic principle consists in observing the rights and interests of all shareholders regardless of the number of shares owned by them.

4.2.2. PJSC “Aeroflot” is committed to ensure long-term prosperity of its shareholders through regular payments of respectable dividends, increase capitalization, implement strategic objectives and mitigate risks in its activities.

4.2.3. The company makes every effort to ensure a high level of corporate governance in accordance with the requirements of Russian legislation and the best Russian and international practices, providing its shareholders with protection and smooth implementation of their rights.

4.2.4. PJSC “Aeroflot” is interested in increasing its investment attractiveness and implements it through effective activity, greater transparency and higher market value of company securities.

4.2.5. Interaction of PJSC “Aeroflot” with the investment community is built on the timely disclosure of updated and reliable information about the company activities, as well as an active dialogue with investors and analysts within the requirements of applicable law.

## **4.3. Relations with Controlled Organizations**

PJSC “Aeroflot” has mutual relations with its controlled organizations in accordance with the requirements of effective legislation of the Russian Federation, the Charter and regulative documents of PJSC “Aeroflot”, charters of the controlled organizations. PJSC “Aeroflot” policy in relation to its controlled organizations is implemented through corporate management tools.

4.3.2. The priority objectives of mutual relations between PJSC “Aeroflot” and its controlled organizations are to ensure reliable operation, effective use of their potential and assets in corporate interests, PJSC “Aeroflot” capitalization increase and higher value of its controlled organizations.

4.3.3. PJSC “Aeroflot” recognizes the importance to improve corporate governance in its controlled organizations, aims to ensure openness and transparency of their activities, and seeks to introduce there the basic principles and best practices of corporate governance used in the company.

#### **4.4. Relations with Business Partners and Competitors**

4.4.1. PJSC “Aeroflot” is one of the leading players in the air carriage industry, which reputation should be unblemished. The company aims to achieve such a high level of honesty and integrity in relations with various business partners (customers, suppliers, contractors, consultants, etc.), which could become model for other airlines.

4.4.2. PJSC “Aeroflot” respects the professional competence and operation quality of its business partners, builds interaction with them on the basis of mutual cooperation and trust, complies with achieved agreements, fulfils its obligations and demands the same from its partners.

4.4.3. PJSC “Aeroflot” runs business only with partners of an unblemished reputation and complies with legislation and generally accepted standards of corporate and business ethics.

4.4.4. PJSC “Aeroflot” adheres to principles of open and fair competition based on the creation of objective market advantages in terms of quality, reliability and provision of additional services. The company does not tolerate unfair competition and strictly adheres to antitrust laws and competition laws in all countries where it is present.

4.4.5. PJSC “Aeroflot” seeks to solve all disputes through negotiations, complying with all applicable legal requirements on a mandatory basis.

#### **4.5. Relations with the State and Society**

4.5.1. Aware of the social importance of its activities, PJSC “Aeroflot” builds and maintains respectful, responsible, constructive and transparent relationships, which exclude conflicts of interest and strictly comply with Russian legislation, with government institutions, local self-governments and various non-governmental organizations.

4.5.2. PJSC “Aeroflot” focuses on both economic and social components of its activities. The company adheres to the principles of corporate social responsibility in all regions of its presence by implementing social support programs and charity in several priority areas, actively contributes to conducting socially important events and traditionally provides comprehensive support for sports.

4.5.3. Exercising charity and sponsor activities, PJSC “Aeroflot” is guided by principles of transparency and long term applied to the projects for rendering help, their targeting, and control of intended use of the Company’s funds.

#### **4.6. Relations with Mass Media**

4.6.1. PJSC “Aeroflot” closely cooperates with the mass media (hereinafter referred to as “media”) and builds it on principles of openness and transparency. Only PJSC “Aeroflot” executives or their authorized representatives may speak publicly with the media and at events attended by the media. As they do not have such an authorization, the Company’s employees must avoid making any statements or comments, which may be interpreted as an official position of PJSC “Aeroflot”. Documents and information transfer to the media by unauthorized persons constitutes a violation of corporate ethics.

#### **4.7. Environmental Protection**

4.7.1. As the undisputed leader of civil aviation in Russia and aware of its responsibility towards society and future generations, PJSC “Aeroflot” ensures compliance with all the rules established by the Russian Federation and international legal enactments in the field of environmental protection.

4.7.2. The environmental policy of PJSC “Aeroflot” is aimed to improve the energy and environmental efficiency of the Company’s final product - carriage of passengers, baggage, cargo and mail. To achieve environmental policy objectives, the Company looks to resolve several tasks, including the implementation of a modern environmental management

system, modernization of its aircraft fleet, and use of new resource-saving and pollution-free technologies.

## **5. APPLICATION OF THE CODE**

### **5.1. Compliance with Code Rules and Responsibility for Their Violation**

5.1.1. Members of the Board of Directors of PJSC “Aeroflot” and all employees of PJSC “Aeroflot” regardless of their positions shall comply with the provisions of the present Code and bear responsibility for adherence to the ethical standards stipulated therein.

5.1.2. The Company imposes heightened obligations on PJSC “Aeroflot” executives, who act as active guides of corporate ethics in the collective, serve as models of ethical behaviour, and should explain the provisions of the Code to their employees, if necessary.

5.1.3. Compliance with the provisions of the present Code is one of the criteria for an individual assessment of employees work activities at PJSC “Aeroflot” during personnel appraisal, decision making on recognition, occupational or career promotion.

5.1.4. In cases stipulated by the current legislation of the Russian Federation, members of the Board of Directors and employees of PJSC “Aeroflot”, who have violated the provisions of the present Code, may be subject to penalty measures, as appropriate.

### **5.2. Code Implementation Procedures**

5.2.1. All employees of PJSC “Aeroflot” should have a signed acknowledgement of the Code.

5.2.2. The employee’s immediate superior and the People Development Department shall be responsible for provision of explanations to employees, satisfaction of requirements and stipulations of the present Code.

The Executive Secretary of the Board of Directors of PJSC “Aeroflot” shall introduce the present Code to the Board of Directors of PJSC “Aeroflot” and inform them about its practical application.

5.2.3. The Board of Directors of PJSC “Aeroflot” shall exert supervisory control over the implementation and application process of the present Code.

The General Director of PJSC “Aeroflot” shall be responsible for organizing the activities related to the application of the present Code.

The Board of Directors’ Audit Committee of PJSC “Aeroflot” shall control the compliance of members of the Board of Directors with the provisions of the present Code.

5.2.4. Each employee of PJSC “Aeroflot” shall:

refer to the provisions of the Code and the rules of conduct related to his/her work;

apply his/her immediate superior or the People Development Department for explanations, if he/she has any questions regarding the rules of conduct;

promptly notify his/her immediate superior of the contacts of any person on purpose to induce him/her to violate the Code<sup>1</sup>;

comply with all the rules of conduct and restrictions specified in the Code.

5.2.5. PJSC “Aeroflot” employees have the right to report any violation of the Code, no matter who they concern - them personally, their subordinates, executives or other persons – via the Hotline, a system of confidential information provision to the Board, to the Board of Directors (the Board of Directors’ Audit Committee) in accordance with the Hotline Confidential Information Provision System Regulation (RI-GD-283H). PJSC “Aeroflot” shall ensure that employees shall not be exposed to any adverse effects (dismissal, undesirable changes in position, cancellation of bonuses, etc.), if they call the Hotline and provide

<sup>1</sup> If any person attempts to induce the employee of PJSC “Aeroflot”/or another employee of PJSC “Aeroflot” to commit corruption offenses, notification of these facts to PJSC “Aeroflot” management should be carried out in accordance with the Procedure for Notification of PJSC “Aeroflot” Management on Inducing PJSC “Aeroflot” Employees to Commit Corruption Offenses(RI-GD-272H).



information about violation of the Code, including the situations when violation evidences communicated during the call are not later confirmed in the course of the internal investigation.<sup>2</sup>

5.2.6. In case of violation of the provisions of the present Code by a member of the Board of Directors of PJSC “Aeroflot”, the General Director or a member of the Board of PJSC “Aeroflot”, this fact shall be considered by the Board of Directors’ Audit Committee of PJSC “Aeroflot” with produced recommendations to the Board of Directors of PJSC “Aeroflot” regarding liability measures, as applicable.

As for other executives and employees of PJSC “Aeroflot”, violations of the provisions of the present Code shall be reviewed as per procedure established by regulative documents of PJSC “Aeroflot”.

## **6. FINAL PROVISIONS**

6.1. The present Code shall be approved by the Board of Directors of PJSC “Aeroflot”. All amendments and addendums to the Code shall be made upon decision of the Board of Directors of PJSC “Aeroflot”.

6.2. Proposals for introducing amendments and additions to the Code shall be made in accordance with the established procedure by members of the Board of Directors of PJSC “Aeroflot”, the Board of PJSC “Aeroflot”, the People Development Department and other business units of PJSC “Aeroflot”.

6.3. The present Code shall be posted on the internal and external websites of PJSC “Aeroflot”.

D.V. Karasev  
Director  
People Development Department

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<sup>2</sup> Current legislation and organizational, directive and regulatory documents of PJSC “Aeroflot” provide for enforcement measures to be taken in the case of knowingly misleading information.