



**CREDIT BANK OF MOSCOW'S
INTEGRATED MANAGEMENT SYSTEM POLICY**

in the field of environmental and social protection,
occupational health and safety,
energy efficiency and energy saving

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Doing business responsibly, reducing environmental and social impacts, improving energy efficiency and energy saving, ensuring occupational health and safety standards, and contributing more to the global sustainability agenda along with achieving strong financial results are key priorities of CREDIT BANK OF MOSCOW (the "Bank"). Fully embracing its responsibility to stakeholders¹, the Bank makes the following commitments:



1. Achieving a positive environmental and socio-economic effect

1.1. Managing direct impact

The Bank undertakes to operate with due diligence, seek to avoid and prevent or, where impossible, mitigate adverse environmental impacts, in particular by reducing effluents and consumption of water, generation of waste and consumption of materials, emissions of pollutants, as well as emissions of greenhouse gases and the overall impact on climate system.

The Bank seeks to reduce its impact at an early stage by design activities and procuring products and services improving energy efficiency going forward.

The Bank undertakes to adhere to the principles of environmental protection, rational use of natural and energy resources, and implement applicable best practices in water use and waste management.

The Bank undertakes to eliminate hazards, ensure safe and healthy working conditions for the prevention of work-related injuries and ill health of employees. The Bank refers to the best standards of corporate governance and business ethics, supports fair competition and counters corruption, seeks more diversity and inclusiveness in its staff, pledges to observe their labour and other rights, in particular by ensuring decent working conditions, access to the grievance mechanisms, freedom of association, prevention of any discrimination, harassment and forced labour.

The Bank acknowledges that its personnel is its core asset and provides career and retraining opportunities.



1.2. Managing indirect impact

The Bank makes every effort to incorporate social and environmental principles into its operations and services, as well as to introduce the responsible product offering concept in order to amplify its positive impact on the environment and promote the socio-economic development of the society and local communities.

The Bank seeks to service sectors and projects promoting the green economy and the transition to sustainable development. The Bank has integrated accounting social and environmental aspects of counterparties into its decision-making process (lending, procurement etc.), seeks to manage the social and environmental aspects of its customers, suppliers, contractors, subcontractors and expects its counterparties to comply with or excel applicable social, environmental and energy legal requirements and best practices. The Bank's counterparties should abide by the principles of ethical conduct with respect to local communities and endorse the importance of allowing them to exercise their civil, political, economic and social rights, and rights to preserve, control, protect and develop their tangible and intangible cultural heritage.



1.3. Voluntary environmental and social initiatives

To achieve the fullest positive environmental and socio-economic effect, the Bank carries out philanthropic and charitable activities unrelated to its business processes, environmental and socio-economic aspects and adverse impacts. The Bank takes an active part in solving salient environmental and socio-economic problems, by running programmes to conserve biodiversity, support certain groups of the population, including socially vulnerable ones. The Bank encourages, and seeks to facilitate, active engagement of its employees in volunteering and charitable projects and initiatives.

PLAN



2. Compliance

The Bank undertakes to operate in line with applicable social, environmental and energy legal requirements, and seeks to adhere to the local recommendations, including the principles for responsible investment of the Bank of Russia. As a public company whose shareholders include international development institutions and foreign investors, the Bank seeks to comply with international treaties and conventions, recommendations of esteemed international financial institutions (World Bank, IFC², EBRD³), and best practices, including standards ISO 26000:2010, ISO 14001:2015, ISO 50001:2018, and ISO 45001:2018.



3. Risk management

The Bank identifies and evaluates potential risks for the natural environment (in particular resulting from wasteful use of energy resources), the social environment, health and safety, and implements a hierarchy of risk control and mitigation measures.



4. Stakeholder engagement

The Bank identifies its stakeholders and seeks to promote the environmental awareness, energy conservation concept, principles of social responsibility and culture of safe work among all of its stakeholders. The Bank cooperates with its stakeholders and takes into account their interests, needs and expectations in making decisions and in achieving objectives and targets on environmental and social protection, occupational health and safety, energy efficiency and energy saving.



5. Allocation of resources

The Bank and its top management undertake to identify the needs for relevant financial, organisational and information resources and make them available for implementing, maintaining and improving a system of environmental, social and energy management (the integrated

management system), and achieving objectives and targets on environmental and social protection, occupational health and safety, energy efficiency and energy saving.



6. Reporting, performance evaluation and continual improvement

The Bank adheres to the principle of transparency, on a regular basis analyses its loan portfolio and prepares reporting on environmental and social protection, occupational health and safety, energy efficiency and energy saving.

The Bank seeks to increase the quality of its non-financial reports by improving its data collection system, analysing best practices of non-financial disclosure and training its relevant staff in line with specified practices.

The Bank's performance is appraised through monitoring, audits and review, both internal and external, of its integrated management system's effectiveness. The Bank seeks to continuously improve its processes, enhance its integrated management system's performance, and improve its environmental, social and energy indicators by analysing and adopting best practices.

Final provision

The Policy is aligned with the Bank's strategic direction and context of development, provides the framework for setting its objectives and targets on environmental and social protection, occupational health and safety, energy efficiency and energy saving, and shall be taken into account in preparing its development programmes.

The Policy shall be communicated to, and is binding on, each employee of the Bank. The Policy should serve as a point of reference for any and all partners of the Bank.

The responsibility for implementing, monitoring and updating the Policy lies with the Chairman of the Management Board.

Chairman of the Supervisory Board
CREDIT BANK OF MOSCOW

William
Forrester Owens

¹Individuals and legal entities or groups influencing and/or influenced by an organisation and its operations. For example, shareholders and investors, employees, customers, local communities and community councils, financial institutions, suppliers, contractors, state supervision, control bodies and representatives of state authorities, mass media, non-governmental organizations and expert communities.

²International Finance Corporation (ex-shareholder of the Bank).

³European Bank for Reconstruction and Development (current shareholder of the Bank).