

APPROVED
by the Supervisory Board of
CREDIT BANK OF MOSCOW
(minutes No. 30 dated 02.12.2019)

CREDIT BANK OF MOSCOW's Code of Corporate Ethics

1. Purpose and objectives of the Code of Corporate Ethics

1.1. The purpose of this Code is to set forth the standards of CREDIT BANK OF MOSCOW's (the "Bank") activities and employees' conduct which focus on maintaining ethical standards, quality of service provided to customers, increasing the Bank's profitability, financial stability and efficiency.

1.2. The objectives of this Code are:

- defining the Bank's mission and corporate values;
- ensuring the Bank's employees understand their personal responsibility to the Bank's customers, business partners, shareholders and their colleagues for executing their official duties and performing their functions in the implementation of the Bank's mission;
- setting forth the fundamental principles of the Bank's relationships with customers, business partners, state and municipal authorities, competitors and the Bank's employees, protecting the interests of the Bank's shareholders, customers, business partners and employees.

2. Scope of the Code of Corporate Ethics

2.1. This Code is based on generally accepted principles and rules of international law, legislation of the Russian Federation, applicable foreign law and good business practices.

2.2. This Code contains the rules of conduct which are mandatory for all of the Bank's employees regardless of their position, including members of management bodies of the Bank (an "Employee").

2.3. All of the Bank's documents, including those shaping relationships with customers, business partners, state and municipal authorities, the Bank's competitors and Employees, shall be developed and approved subject to the provisions hereof.

2.4. The provisions hereof shall be amended and supplemented by the decision of the Bank's Supervisory Board according to generally accepted principles and rules of international law, legislation of the Russian Federation and good business practices.

2.5. All additional internal procedures, rules and provisions of the Bank specifying individual sections of this Code shall comply with the principles incorporated herein.

3. Main principles of corporate conduct and business ethics

The Bank's activities are organised and carried out based on the following corporate conduct and business ethics principles:

- compliance with the applicable legislation of the Russian Federation;
- mandatory execution of the higher management's decisions for all Employees;

- controllability and accountability of the Employees to their superiors, their responsibility for non-performance or undue performance of their obligations;
- consistent compliance with the generally adopted business ethics standards;
- equal access to vacant positions subject to abilities and professional training;
- provision of social security to the Employees;
- presumption of good faith in the Employees' mutual relationships: none of the Employees may be suspected of bad faith without good reason;
- mutual respect among Employees;
- no intentional defamation or libel among Employees.

4. Mission

The Bank's mission is to create a universal financial institution aimed at strengthening market positions in areas of operation, while maintaining the high quality of services provided to corporate and individual customers.

5. Values

5.1. The Bank adheres to socially responsible business practices and ensures compliance with international standards of business efficiency and quality.

5.2. The Bank maintains efficiency of work and coherence of the team through provision of ethical and professional guidelines and values that allow for the creation of a unified professional team.

5.3. The Bank's basic fundamental values are:

1) Productivity

The Employees work together towards achieving high performance and improving the Bank's activities to an acceptable level of risk. The Bank's activities are aimed at achieving its strategic goals and ensuring the activities are productive.

2) Mutual respect

The Employees understand that they work for the people, among the people and with the people. Maintaining friendly internal relationships in the team based on team spirit and mutual assistance is the Bank's priority, while ensuring and increasing the level of trust and loyalty among customers.

3) Pleasure working

The Bank offers the Employees an opportunity to achieve personal and corporate goals. Working at the Bank allows the Employees to unlock their personal, professional, creative and leadership potential. In realizing it, the Employees enjoy working together in a team of like-minded people.

6. Relationships with customers, business partners and representatives of state and municipal authorities

6.1. The Bank builds relationships with customers, business partners and representatives of state and municipal authorities based on the principles of good faith, fairness, professionalism, mutual trust and respect, priority of customers' interests, inviolability of obligations, complete disclosure of relevant information, priority of negotiations over legal proceedings, transparency and predictability.

6.2. The Employees use their best endeavours to minimize any risks for customers, business partners.

6.3. The Employees use their endeavours to ensure that customers and business partners share the principles of good faith, fairness, professionalism, mutual trust and respect in their relationships with the Bank. The Employees use their best endeavours to ensure that customers and business partners share and follow these principles.

6.4. In their activity, the Employees are governed by the Bank's internal documents aimed at prevention of corrupt practices and bribery. Under no circumstances can the Employees admit any offense related to corruption or bribery, or emergence of grounds for such an offense.

6.5. The Employees thoroughly review and promptly respond to comments, claims and complaints addressed to the Bank.

6.6. The Employees do not (directly or through affiliated parties) grant privileges and advantages to customers, business partners, representatives of state and municipal authorities.

6.7. The Employees are not authorized to investigate and assess a customer or a business partner on behalf of the Bank, unless it is related to the execution of their official duties at the Bank.

7. Relationships with competitors and counterparties

7.1. The Bank builds relationships with competitors based on the principles of fairness and mutual respect. The Bank considers competitors an additional incentive for development.

7.2. The Bank builds relationships with counterparties based on the principles of responsible partnership.

7.3. The Bank selects suppliers and contractors on the basis of competitive bidding. The governing principle of selecting suppliers and contractors is ensuring fair competition.

7.4. The Bank works with reputable counterparties complying with laws and generally accepted standards of corporate and business ethics.

8. Relationships with the Employees

8.1. The Bank builds relationships with the Employees based on the principles of long-term cooperation, mutual respect, rigorous performance of mutual obligations, and follows standards widespread in the global business culture.

8.2. The Bank does not tolerate any forms of discrimination towards the Employees on political, religious, national and similar grounds in the matters of employment, labour compensation and promotion.

8.3. The Bank takes actions aimed at protection of health, labour and ensuring safety for the Employees. The Bank creates all necessary conditions for professional growth, increasing social well-being of the Employees.

8.4. The Employees must immediately inform his or her direct manager in case he or she received an offer and makes a decision to transfer to another job.

8.5. The Bank understands its Employees' participation in social and entrepreneurial activities if such activities do not negatively impact the Bank and directly the performance by such Employees of their official duties.

8.6. The Employees do not admit emergence of situations which may damage the Bank's business reputation, and other non-material or material interests.

8.7. Employees do not abuse their office or use the Bank's confidential or insider information to which they have access to elicit personal benefits.

8.8. The Bank encourages development of risk management culture. When performing their functions, the Employees need to pay special attention to potential risks. The Employees are advised to inform their direct manager, the Internal Audit Department and the Compliance Section (or contact the Hotline for Employees) of any risks which may result in losses for the Bank.

9. Corporate style

9.1. The Bank's image is an important tool for achievement of general goals and execution of tasks, and shall be used with maximum efficiency.

9.2. The Employees are polite, regardless of communication level, form and method, well-intentioned, responsive. The Employees tolerate the facts of incorrect communication demonstrated by customers, business partners and other parties.

9.3. The Employees rigorously comply with labour discipline. When the circumstances may result in the breach of discipline, the Employees inform their direct managers. The Employees try to minimize emergence of such circumstances.

9.4. The Employees must follow business style in clothes complying with the Bank's image. The Employee's appearance must not be provocative or negligent.

Not following business style in clothes is a violation of labour discipline and may result in a disciplinary award.

10. Accounting and reporting

10.1. The Bank ensures completeness, accuracy and reliability of data reflected in accounting statements and reporting.

10.2. The Bank reflects all conducted transactions in strict compliance with accounting and reporting requirements, and, particularly, precludes preparation of counterfeit primary accounting documents, execution of invalid accounting transactions.

The Employees having information about violation of accounting and reporting principles, particularly, about embezzlement, the Bank's unaccounted property, must inform of it its direct manager and operating units without delay.

11. The Bank's information policy

11.1. The Bank discloses information about its activity according to the legislation of the Russian Federation, based on the principles of credibility, regularity, promptness of provision and the Bank's openness.

11.2. The scope of information provided to customers, business partners is defined by the nature of banking services rendered to them, according to the legislation of the Russian Federation, this Code and the Bank's internal documents.

11.3. The Bank's customers and business partners can be certain that the information about them, their business and other activity, including their status as its customers, is confidential and shall not be disclosed by it except as provided for by Russian laws or, to the extent contractually allowed, upon their request or with their informed consent.

11.4. The Bank follows a strategy of information openness and publicity. The units and Employees acting as sources of information think in advance over plans of its distribution, define the completeness of information, and check its credibility. The Bank identifies the range of persons entitled to provide comments in the media. No other persons may give comments to mass media

and must refer them to the External and Internal Communications Department of the Marketing and Advertising Division.

11.5. Information about the Employees, internal structure, operational procedures, financial flows, transactions, accounts and deposits of customers and business partners, representatives of state and municipal authorities, and other data which may damage the business reputation, other material or non-material interests of the Bank, customers, business partners, representatives of state and municipal authorities, except for publicly available information, is considered confidential, unless disclosure of such information is provided for in the legislation of the Russian Federation. The Employees undertake to protect confidential information in writing.

11.6. The Employees having access to the Bank's inside information only uses it for the purposes of performing his or her official duties, according to the provisions of the legislation of the Russian Federation, this Code, the Bank's internal documents. The Bank's Employees and subdivisions deal with mass media, investment community or regulator's representatives on the basis of the Bank's bylaws regulating treatment and disclosure of information, including documents governing the rules for treatment of trade secret information and/or insider information.

11.7. If moved to another position, the Bank's Employees continue to preserve the Bank's inside information confidentiality. The Bank in its turn does not force new Employees to disclose such information on their previous employers.

12. Protection of shareholders, customers, business partners and Employees.

12.1. The Bank uses its best endeavours to protect the rights of shareholders, customers, business partners and Employees.

12.2. The Employees shall care about protection of the Bank's material and non-material values.

12.3. The Employees actively participate in prevention of any illegal actions on the part of the Employees, customers, business partners, other third parties with regard to the state and community on the whole, and with regard to the Bank's shareholders, customers, business partners and the Bank.

12.4. The Employees actively participate in countering legalization (laundering) of criminally gained income and financing of terrorism.

12.5. The Bank's Employees do not act, if such acts are considered information abuse and/or market manipulation according to applicable laws or the Bank's bylaws.

12.6. The Bank ensures timely and reliable public disclosure of insider information as required by applicable laws to provide free and equal access to the information to its shareholders, investors and other stakeholders. Any insider information disclosed by the Bank must be true, up-to-date and disclosed as required by applicable laws and the regulator.

13. Prohibition of insider trading, compliance rules for the Bank's Insider information treatment

13.1. Insider information about the Bank may materially affect the value of the Bank's securities and give unfair commercial advantages to those who possess it.

13.2. It is strictly prohibited that the Bank's Employees (personally or via representatives):

- make any trades in the Bank's securities based on insider information;
- make derivative contracts of which the underlying assets are the Bank's securities, based on insider information;
- disclose any insider information to third parties except on the need-to-know basis and in compliance with certain rules, restrictions and conditions set out in the Bank's bylaws;

– give any recommendations to third parties based on insider information, bind or induce them otherwise to sell or purchase the Bank’s securities.

13.3. For the purposes of mitigating the risk of insider trading, the Bank keeps an up-to-date list of persons (the “Insiders List”) having access to insider information and subjected to special rules when dealing in its financial instruments (the “Bank’s Insiders”), and introduces a moratorium (prohibition) on transactions with the Bank’s securities before the Bank discloses its quarterly and annual financial statements and during the period needed for the market to react to the publicly disclosed insider information.

13.4. Members of the Supervisory Board, Management Board and Audit Panel, and the Chairman of the Management Board have access to insider information by virtue of applicable laws and must be added in the Insiders List.

13.5. Any insider information may be disclosed to any of the Bank’s Employees not specified in cl. 13.4 hereof to perform their job duties under employment contracts and/or job descriptions provided that they are added to the Insiders List.

13.6. The Bank provides the Insiders List as required by the regulator or the exchange.

13.7. The Bank’s Insiders must refrain from making any trades in its securities and making derivative contracts of which the underlying assets are the Bank’s securities within the following closed periods:

– when the Bank’s annual accounting statements prepared in accordance with the Russian Accounting Standards (RAS) are published: from 03 March to the end of the second exchange day after their publication;

– when the Bank’s annual financial statements prepared in accordance with the International Financial Reporting Standards (IFRS) are published: from 20 February to the end of the second exchange day after their publication;

– when the Bank’s RAS quarterly statements are published: from 18 April, 18 July, 17 October (for the 1st, 2nd, 3rd quarters respectively) to the end of the second exchange day after their publication;

– when the Bank’s IFRS quarterly financial statements are published: from 26 April, 31 July, 27 October (for the 1st, 2nd, 3rd quarters respectively) to the end of the second exchange day after their publication.

13.8. It is recommended that the Bank’s Insiders:

– purchase its securities only for the purposes of long-term (more than 6 (six) months) investments;

– do not make any repo transactions, and sell or purchase its securities on credit.

13.9. It may be recommended that the Bank’s Insiders refrain from making any trades in its securities in other periods of time besides closed periods defined in cl. 13.7 hereof. Any recommendations to the Bank’s Insiders may be sent by e-mail, fax or post.

13.10. The Bank’s Insiders must notify the Bank of any trades they make in its securities within 10 (ten) business days of making such trades.

The Bank’s Insiders must notify the Bank of Russia of any trades they make in the Bank’s securities within 10 (ten) business days of receipt of the relevant request from the regulator.

13.11. Any members of the Supervisory Board, Management Board and Audit Panel, and the Chairman of the Management Board must, within 1 (One) month of their election, give the Bank a written notice of any of the Bank’s securities that they hold and of any derivative contracts they have made of which the underlying asset is such securities.

13.12. When making, receiving, processing or delivering any documents (in particular by e-mail), each Employee must check whether they contain any insider information.

13.13. Employees must store any documents containing insider information only on carriers registered with the Bank and only in protected places.

13.14. Employees dealing with agreements, transactions, projects etc. must monitor transfer of insider information to any counterparties in preparing, making or performing any agreements / transactions / projects in which they are responsible officers or that have become known to them.

13.15. No restrictions on making trades in the Bank's securities as provided for by this section of the Code apply to any trades made under any direct or indirect equity-linked remuneration programmes that may be approved in future.

14. Conflict of interest

A situation of conflict of interest occurs when any Employees have an opportunity to gain financial or other benefit for him/herself, relatives or friends, to the prejudice of the Bank's commercial and corporate interests, and he/she needs to make a difficult moral choice.

The Employees avoid situations, circumstances or transactions where personal interest may conflict with or contradict the Bank's interest. In the event of occurrence of such a situation, the Employees should seek advice from the direct manager, or obtaining advice in another way (see section 15 hereof).

The Bank does not deny employment to relatives or friends, however in all cases where any Employee refers his/her close relative (parents, children, spouses or siblings) therefor, it is required to get an approval of the Compliance Section.

Employees acknowledge that they may not influence decisions regarding the promotion of their relatives or friends. Close relatives may not be in relations of strict mutual subordination, if their activities are associated with the disposition of the Bank's financial and physical resources.

Employees shall inform the Compliance Section if they know of any close relatives working at the Bank's direct competitors, as this may lead to a conflict of interest.

The conflict of interest in the course of professional activities in the securities market means discrepancy between the Bank's interests and its obligations caused by a conflict between property-related and other interests of the Bank, its management bodies, officers or Employees and property-related or other interests of customers, and a conflict between self-interest of the Bank's Employees, its officers and customers' lawful interests whereupon the customers suffer losses or are otherwise adversely affected.

Measures to prevent conflicts of interest in the course of professional activities in the securities market and procedure for their implementation are set out the Bank's bylaws.

15. The Bank's gift policy

The Bank admits acceptance by the Employees of gifts from customers / potential customers and business partners, only if such gifts meet the following conditions:

- the gift complies with the adopted business practices and standard ethics;
- approximate cost of the gift does not exceed 5,000 (five thousand) roubles;
- acceptance of the gift by the Employees cannot be interpreted as a bribe in the interests of the giver;
- disclosing the fact of accepting such gifts by the Employees will not put the Bank or the Employees in an unpleasant position.

If acceptance of a gift envisages granting any privileges to the customer or the cost of the gift exceeds 5,000 (five thousand) roubles, any Employee shall inform of it his or her direct manager when receiving such a gift.

Gifts can only be given to the Bank's customers, if the customer's company does not have any restrictions related to accepting gifts.

Members of the Supervisory Board and their related persons should not accept gifts from, or use any other direct or indirect benefit provided by, any parties interested in their decisions (other than tokens of attention in accordance with generally accepted rules of courtesy or souvenirs given during official events and subject to compliance with conditions listed in the first paragraph of this clause).

16. Conflict resolution

As provided for in the Regulation on the hotline of the Audit and Risk Committee of the Supervisory Board.

17. Enforcement

The importance of this Code in achieving general goals depends, in particular, on each of the Employees' compliance with its provisions and on personal willingness to cease or prevent its violation.

This Code imposes additional obligations on managers at all levels. Managers shall:

- serve as a role model in complying with ethical standards;
- ensure that the subordinates understand the requirements set forth herein;
- consistently ensure practical application of the provisions hereof.

Compliance with the norms and standards hereof is an important criterion for the assessment of personal and professional qualities of the Employees, quality of their work, making decisions on remunerations, and also for granting the Employees opportunities for professional or career growth.

Execution of the provisions hereof is supported by the system of internal organizational and administrative documents of the Bank.

The Bank's Compliance Section is responsible for:

- controlling compliance with provisions hereof when the Bank's subdivisions develop internal organisational and executive documents;
- monitoring compliance with the provisions hereof by the Bank's Employees.

Chairman of the Supervisory Board

William Forrester Owens