

OZON

Corporate Ethics and
Business Conduct
Guideline

Version for public access

Message from CEO Alexander Shulgin

Dear friends and partners,

I am proud to present Corporate Ethics and Business Conduct Guideline of Ozon Group of Companies.

This Guideline is not a new document. It contains of the same rules, values and principles which we strictly adhere on the everyday business routine.

Ozon is a great, dynamic, rapidly growing team of employees. We tend to maintain and build common corporate business culture.

We oblige all our employees to follow the Guideline very closely. Ozon also expects employees to be aware of it and stick to the main principals from the Guideline. In any disputable situation – comply to these principals. This is the only way to find proper solution.

OZON Main Principals



We strictly adhere to the following principals in conducting business with our clients and partners:

- We care about clients- we strive to meet their expectations, win their trust and maintain it with the quality of the services.
- We conduct business honestly, with zero tolerance against corruption and fraud- do not steal, do not hide important information, do not commit any crime, behave with the respect to Company's interest.
- We do our job in a good way and take it very responsibly- we are result- oriented, pursue any goals and fulfill promises.
- We respect each other- we value the other party, always assist and support any member of the team (online or offline).

We are confident in these principals and adhere to them under any circumstances.

Compliance to Legislation



We do not violate the law. We interact with the state authorities in the scope of implementation of the applicable law.

We care about the environment and always try to minimize any negative consequences of our activities.

We value and support human rights. We conduct our business with the respect to them

We show zero tolerance to any fraud actions: money laundering, concealment of income, default of taxes, contravention of sanctions, children or compulsory labor.

We do not accept illegal trade: smuggling, distribution of counterfeit (goods with copyright infringement) and adulteration (goods without proper certification, labeling). Ozon does not sell: pornographic products, poaching products, products made from toxic materials and other products. The list of prohibited goods for sale is specified in contracts.

We take all possible actions to prevent, detect and counteract such violations.

We demand the same behavior from our partners and contractors.

Interaction with Clients, Contactors and Partners



We appreciate and tend to keep our clients confidence. Interaction with clients is provided with the respect to ethical principals and standards. Main focus is to exert every effort to improve client services. We listen to all categories of our customers, help them and implement their ideas for permanent improvement of our product and services.

Cooperation with customers and contractors is based on applicable law and the principle of fair competition. We are convinced that free competition gives our customers the freedom to choose the best products at the best prices, and contributes to the improvement of the quality of goods and services.

We know our counterparties: we do due diligence check up (check them for reliability, compliance with legal requirements and other).

We strive to maintain long-term relations with contractors which are based on the principles of fair competition, legal and honest cooperation. Moreover we monitor the compliance of negotiation process and conclusion of contracts with applicable legislation.

Interaction with Competitors



We respect our competitors and maintain fair and open communication in the free market. We do not limit the freedom of choice of our clients.

We do not ask for or receive any confidential information about our competitors. We obtain all information about competitors from open sources. We use legal and ethical methods of data collection.

We do not provide inaccurate and evaluative comments about competitors business, we respect the principles of confidentiality, we obey the law on protection of competition. We do not engage into collusion and preliminary agreements with our competitors (including any pricing policy or markets division).

Anti- Corruption

We do not accept bribery and corruption in all its manifestations and forms.

We do not accept, give or offer money, gifts or services in exchange for receiving any benefits for ourselves, our friends, relatives or for the benefit of Ozon.

Conflict of Interest

We act primarily in the interests of the company and its customers. A conflict of interest is a case where an employee's personal property interest can affect the performance of an employee's job duties (including making business decisions).

We avoid situations when possible conflicts of interest could arise.

Specified anti-corruption rules and conflict of interest controls are set out in the Anti-Corruption Policy and other internal policies of Ozon.

Business Gifts

The company accepts gifts and entertainment which are normal for business practice and do not contradict legal requirements. Such gifts or participation in events should not affect the ability of the employee or counterparty to make impartial and fair decisions. Therefore, you should not make or accept a gift or invitation while making a business decision.

Gifts or invitations should not be made with an intention to receive something in return. Gifts or invitations should not be accepted if they put the receiver in a position of the receiving debtor or obligated person.

Principles We Follow:



never give or accept money or any alternative as a gift



gifts and events must be appropriate to the occasion, cannot be too frequent or too expensive

Specified rules for business gifts and events are set out in Ozon's Anti-Corruption Policy.

Confidential Information



Ozon considers any publicly undisclosed information as confidential.

We store and protect our private data. We do not request, accept or use any confidential information of contractors, competitors, employees and customers (for example, price lists), except information which has been lawfully obtained from open sources or by a contract with a person entitled to transfer it to us.

We realize that insider information from Ozon or from our counterparties and from our partners is also confidential. We follow the restrictions imposed by inside information laws.

Personal Data



We particularly care about personal data protection of our employees, contractors, partners, customers and other persons whose personal data we collect and store.

The company collects and stores personal data which is only necessary for Ozon's activities or required by applicable law. We do not collect redundant personal data.

We take all necessary measures (legal, organizational, technical) to protect personal data from unlawful or accidental processing, including distribution and other illegal actions.

Only authorized employees of the company have access to personal data. We do not disclose personal data to third parties and do not transfer it (including to other countries) without the consent of the subject of personal data, unless otherwise is provided by applicable laws on personal data (for example, disclosure to public authorities).

Public Engagements, Statements and Social Networks Disclosure



Ozon is pro active company in public arena. Ozon employees give interviews and comments in the media space, participate in seminars, conferences and other external events. The company uses social networks for external and internal communications.

We are very serious about the appearance we have in social networks, about statements we make, about materials we publish, we do not use offensive or derogatory expressions.

We act with diligence and care when disclosing any information related to the company.

Company Data Accounting and Compliance with Standards



Ozon maintains accurate, correct and transparent records of company activity data which compiles its financial statements.

We are aware that false or misleading records and documents are strictly prohibited: we do not distort or hide the data to be reported.

Our accounting and financial reports comply with mandatory standards. We render reports based on official documents.

We implement an effective system of internal control in the company to provide correct financial statements to our owners, future investors and government agencies.

Workplace Behavior

Ozon gives full attention on creating a safe and healthy working environment for its employees. In response, the company expects from all employees to take good care of workplace and company property, comply with labor safety, fire safety and other labor discipline requirements.

Teamwork

We follow the rules of business ethics and maintain a friendly atmosphere in the office. We also abide by these norms in communication with contractors, partners, clients, and colleagues in the market.

We do not accept any forms of discrimination, harassment or violence, as well as abusive or disrespectful behavior towards anyone.

We respect special aspects of each person and do not admit any discrimination - by race, skin color, age, sex, religion, language, marital status, political or other beliefs, physical limitations, national origin, lifestyle, social status or others featured.

Use of Company Assets



The results of intellectual work which have been obtained during the performance of employees duties are considered as the property of Ozon. We do not use the company's systems to infringe Ozon's intellectual property rights (for example, unauthorized copying or forwarding of information that is subject to intellectual property rights).

We are against the use and transfer of objects and information created by third parties (results of intellectual activity and (or) means of individualization) and protected by law without official permission for this.

Political Participation

Ozon does not participate in political activities, does not support political parties or related foundations and organizations, candidates for deputies or specific politicians.

Charity

Ozon takes part in solving social problems.

We are involved in the life of society, we can support various charitable projects and events, we implement opportunities for charity within the framework of our services.

Charity projects involving Ozon companies may require additional approval in accordance with Ozon's internal procedures.

Our employees have the right to participate in charity activities on their own initiative. Such involvement must not involve Ozon resources or compromise the Ozon brand.

Hot Line

We ask our clients and partners not to be silent if you see a violation of the corporate ethics, business conduct or legal requirements related to Ozon.

For this purpose we have the Compliance Hotline - a channel you can use to deliver a message that has signs of offenses. **Calls to the Hotline can be submitted anonymously.** In any case, Ozon guarantees that no employees will be prosecuted for reporting their suspicions to the Hotline in good faith.

You can report to the Compliance Hotline by using the contacts specified in the Compliance Hotline section on the OZON.RU website