

**OZON**

Code of Corporate Ethics  
and Business Conduct

# Message from the General Director

Dear colleague,

We would like to present to you the Code of Corporate Ethics and Business Conduct of the Ozon Group of Companies (call it the Code of Ethics or simply the Code).

Our Code is nothing new, these are the same rules of conduct, values and principles that guided us earlier, they are just combined into a single document. As you read the Code, remember that you are a member of a large team that is rapidly developing and growing, but at the same time is striving to build and maintain a common corporate culture.

Working at Ozon means not only fulfilling your job duties, but also taking decisions every minute, taking actions and steps that affect you, your colleagues, the company itself, its partners, and customers. The Company expects you to follow the Code. Acting in accordance with it, you can be sure you are acting correctly in a difficult situation, taking care of our customers, partners, and employees, and protecting the Ozon image.

Nevertheless, the Code cannot be an exhaustive set of rules and cannot cover all work situations, so always ask yourself about the ethics and the correctness of an action being performed. If it is not possible to answer this question independently, you can always contact the Legal Department (Compliance) for advice by e-mail at [compliance@ozon.ru](mailto:compliance@ozon.ru).

# Building a corporate culture



Each of us participates in building the corporate culture – this is our working environment and the foundation for adhering to the company’s values. The Code applies to all employees of companies belonging to the Ozon Group, regardless of position, post, and experience.



The company’s managers play an important role in monitoring compliance with the Code – they are responsible for creating a culture and work environment that fosters correct and fair decisions, actions, and words.



All the company’s managers must set a personal example of good conduct, a commitment to ethical principles, and honest fulfilment of job responsibilities. Managers should be approachable and ready to explain the Code’s provisions to their employees, as well as the general provisions of labour laws and internal policies, procedures and regulations.



The company expects that all employees, and primarily their managers, will report promptly any violations of the Code and other internal policies and procedures about which they are aware.

# Work principles at Ozon



## **We adhere to the following principles in our work:**

- we care about our customers – we strive to meet their expectations as much as possible, and to gain and maintain their trust with the quality of our services;
- we protect our liberty – in dress, style, communication, behaviour – but our freedom shall not limit the liberty of others;
- we behave honestly, openly, and in good faith – we do not take others' things, do not hide important information, do not violate the law, and proceed from the interests of the company;
- we do our work efficiently and responsibly – we work for a result, we achieve our goals and keep the promises we make;
- we respect each other – we respect people we speak with and always help and support each other (both offline and online);
- we know how to work in a team – we work as one, cooperate with each other, and distribute tasks among ourselves correctly.

**We are confident in the values and correctness of our principles and adhere to them in all circumstances.**

# Compliance with legislation



We do not violate the law and, if necessary, cooperate with state and regulatory authorities regarding the implementation of the law.

We are responsible towards the environment and try to minimise any negative consequences of our activities.

We respect and support human rights and build our operations so that they do not create conditions conducive to a violation of these rights. Ozon complies with labor laws: it pays punctually the salary to its employees as provided by the employment contract, provides paid leave, sick leave, benefits, safe working conditions, and other rights stipulated by law.

We reject all types of fraud, money laundering, concealment of income, tax evasion, crime and terrorism, and the use of child or forced labour.

We consider illicit trade to be unacceptable: smuggling, the distribution of counterfeit products (goods with copyright infringement) and fake goods (goods without proper certification and labelling). Ozon does not sell: pornographic products, products for poaching, products made from toxic materials, and certain other goods. A complete list of the goods prohibited for sale on Ozon services is indicated in contracts with counterparties.

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

We demand the same from our partners and counterparties.

# Interaction with customers, counterparties, and partners



We respect, value, and strive to maintain the trust of our customers. We are always ethical and friendly in our dealings with customers. Our task is to make every effort to improve the quality of customer service, and we therefore listen to all categories of our customers, help them, and communicate their ideas and suggestions to colleagues in order to improve our products and service.

We build cooperation with customers and counterparties based on applicable law and are guided by 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 in the quality of goods and services.

We know our counterparties: we verify them for reliability and compliance with legal requirements, and do not cooperate with counterparties that have not passed the “know-your-counterparty” checks.

We strive to maintain mutually beneficial long-term relationships with counterparties, based on the principles of objective selection and legal, honest, fair, and open cooperation. Of course, we monitor compliance with legislation during the negotiation process and entering into contracts.

We do not provide guarantees (letters of guarantee) or recommendations in relation to our business partners, and we do not speak publicly about the results of our collaboration with them or about the reasons and methods for choosing our partners.

# Relations with competitors



We respect our competitors and support fair and open interaction on the free market. We do not limit our customers' freedom of choice.

We do not ask for or receive any confidential information about our competitors. We obtain all information about competitors from accessible official sources and by using legal and ethical methods to collect information. If our friends or people close to us work in competing companies, we will be extremely attentive and careful about what we say or learn when discussing work topics.

We do not give inaccurate or evaluative comments about the work of competitors, we respect the principles of confidentiality of a competitor company, and we comply with antitrust laws, including compliance with legislation on protecting competition. We do not enter into collusion and preliminary agreements with our competitors, including regarding pricing policy or market division.

We report cases of unfair competition of which we have become aware.

# Combatting corruption

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

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

We report any act or suspicion of corruption that has become known to us.

# Conflict of interests

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

We avoid situations in which potential conflicts of interests might arise. If it is impossible to avoid a conflict of interests, we disclose it in good faith and arrange our further work in such a way that the conflict of interests does not affect our actions. We follow the methods developed by the company to resolve conflicts of interests.

In our free time, we may conduct our own projects that are not related to our main activity, and in order to avoid disagreements and conflicts of interests, we notify the company in the prescribed manner.

Detailed rules for preventing corruption in the company and controlling conflicts of interests are set out in Ozon's Anti-Corruption Policy and Conflict of Interests Fair Disclosure Policy.



# Business gifts

The company permits gifts and hospitality or entertainment events that are typical of normal business practice and do not contravene legal requirements. Such gifts or entertainment events should not affect the ability of an employee or counterparty to take impartial and fair decisions. Therefore, you should not give or accept a gift or invitation when taking a business decision.

Gifts or invitations should not be made with a desire to receive something in return, and should not be accepted from a debtor or obligant.

It is prohibited at the company to give gifts or entertain government officials.

## We adhere to the principle that:



money or its equivalent should never be given or accepted as a gift



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

Detailed rules for giving gifts and entertaining are established in the Ozon Anti-Corruption Policy.

# Confidential information



Any information that Ozon does not disclose publicly is considered confidential. Information used by us in the performance of official duties and relating to our company or its customers, employees and counterparties, if disclosed, may have an impact on our company.

If, in order to perform our work, we need to transfer any information to counterparties, we must make sure that a separate nondisclosure agreement (NDA) is entered into with them or a relevant clause is included in the contract.

We not only store and protect our own confidential information, but we also do not request, accept, or use any confidential information of counterparties, competitors, employees, and customers (for example, price lists), other than that which is obtained lawfully from open sources or under a contract with a person entitled to transfer it to us.

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

We work with confidential information carefully: we block our computer screen when absent from the workplace, check the address on the mail before sending it, do not leave documents for open access or in a public place, and transfer depersonalised data to third parties.

If we fear that we have disclosed confidential information, we will immediately inform our immediate supervisor, the Legal Department (Compliance Section) or the Hotline.

# Personal data



We pay special attention to the protection of personal data of our employees, counterparties, partners, customers, and other persons whose personal data we collect.

The company collects and stores only the personal data necessary for the Company's activities or that are required in accordance with legislation. We do not collect superfluous personal data.

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

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

We report cases of which we have become aware of the processing or transfer of personal data without the appropriate permission.

# Public appearances, statements, and disclosing information on social media



Ozon actively publicises its activities in the public arena. Ozon employees give interviews and commentary in the media space and participate in seminars, conferences, and other external events. The company uses social media for external and internal communications.

We inform our manager and the company's PR Department about any planned public appearance and obtain recommendations on possible disclosure of information. We adhere to these recommendations, as well as the company's responses to questions about Ozon's results and plans.

Even if we are not speaking on behalf of the company, we may be associated with it and related questions asked; therefore, it is always preferable for us to receive and use reasonable instructions from the PR Department.

We do not disclose or comment on Ozon's confidential information, and we do not make statements either on behalf of the company without the approval of the PR Department. We do not publish on social media and do not publicly reveal any information about Ozon projects and products that have not already been announced by the company internally and externally through official communication channels.

Even if we do not explicitly identify ourselves as part of Ozon in our personal profiles, our statements and published information may be regarded as the company's position. Therefore, we manage responsibly our appearance on social networks, our words and published materials, and do not use offensive or derogatory expressions. If we have any doubts about the consequences of posting particular information, we always seek advice from the PR Department.

# Company data accounting and compliance with standards



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

We know that it is strictly prohibited to maintain false or misleading accounts and documents: we do not distort or conceal reporting data.

Our accounting and financial reporting comply with RAS and IFRS. We generate reliable reports based on official documents.

HR paperwork is administered in accordance with the requirements of the labor laws and the requirements of state bodies.

We are building in the company an effective internal monitoring system for the reliability of financial statements to provide our owners, future investors, and state bodies with correct and punctual information about financial and business activities.

We report suspicions of distortion or inaccuracy of reporting data.

# Behaviour in the workplace

Ozon places great emphasis on creating a safe and healthy working environment for its employees. In return, the company expects that all employees will take good care of the working environment, the workplace and company property, and comply with labour safety, fire safety, and other labour discipline requirements.

# Working in the team

We treat our colleagues with respect and support them. We help new employees to adapt, comply with the norms of business ethics, and maintain a friendly atmosphere not only in the office, but also in communications with counterparties, partners, customers, and colleagues on the market.

We do not accept any form of bullying, harassment or violence, or abusive or disrespectful behaviour towards anyone.

We respect each person's characteristics and do not permit any possible discrimination according to race, skin colour, age, sex, religion, language, marital status, political or other beliefs, physical limitations, national origin, lifestyle, social status, or other features.

# Use of company assets



Ozon provides and ensures a comfortable working environment for employees and all the resources necessary for productive work. In return, Ozon expects employees to use these resources and technologies wisely and economically. In addition to movable and immovable property, the company owns intellectual property. This includes software, technology, inventions, logos, and other work products created by our employees, including our brand and our trademarks, created as part of our job responsibilities.

The results of intellectual work created as part of work duties are the property of the company. We do not use the company's systems to violate Ozon's intellectual property rights (for example, unauthorised copying or forwarding of information subject to intellectual property rights).

At the same time, we support a culture of open source code and publish the results of our work that might be useful to other teams on official pages and on behalf of the company, and we coordinate each such publication with the manager.

We oppose the use and transfer of objects and information created by third parties and protected by law as the results of intellectual activity and/or means of identification, without obtaining official permission.

If we bring guests to the office, we take full responsibility for their actions in the office.

We must make sure our guests do not interfere with anyone, and do not have access to the company's work resources or confidential information. We never leave our guests unaccompanied, even if they are a former Ozon employee.

# Participation in political activities

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

We respect the right of every citizen to participate in political activities. However, such activities of an Ozon employee must be carried out in their free time, without using the Ozon brand or resources.

# Charity

Ozon strives to make its contribution to resolving social problems.

We participate actively in public life, support various charitable projects and events, and introduce opportunities for charitable work as part of our services.

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

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



# Compliance with policies

All Company policies are posted on the Company's internal resources in the relevant sections.

It is our responsibility to comply with the Code of Ethics, Anti-Corruption Policy, and other Company policies concerning ethical business conduct.

In the event of disputes, we may contact our manager, the Legal Department (Compliance Section) or our HR business partner.

# Hotline

In order to act in accordance with the principles of corporate ethics, we must be as honest and open as possible.

We will not keep silent if we see a violation of the principles of corporate ethics, business conduct, or legal requirements.

For this purpose, our company operates a Hotline – a tool through which it is possible to transmit a message about, in the reporter's opinion, signs of offences. Calls to the Hotline may be submitted anonymously. In any case, Ozon guarantees that employees who have in good faith reported their suspicions to the Hotline will not face retaliation.

## **We will report a violation in any convenient way:**

- We will contact a direct or superior manager.
- We will contact the Legal Department (Compliance Section) at [compliance@ozon.ru](mailto:compliance@ozon.ru)
- We will send a message or call the Hotline using the contact details indicated on the [ozon.ru](https://ozon.ru) website in the Ethics Hotline section