

APPROVED

by the Technopolis Moscow SEZ JSC

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HUMAN RIGHTS POLICY

Technopolis Moscow Special Economic
Zone Joint-Stock Company

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1. Introduction

Respect for and observance of human rights is fundamental to sustainable development.

Technopolis Moscow Special Economic Zone Joint Stock Company (hereinafter — the SEZ Management Company) shares a responsible approach to the comprehensive and guaranteed observance of human rights, committing itself to ensuring a dignified and respectful treatment of people.

The Human Rights Policy of the SEZ Management Company (hereinafter — the Policy) confirms its adherence to the Universal Declaration of Human Rights, International Labor Organization Declaration on Fundamental Principles and Rights at Work, generally recognized standards on protection of human rights and freedoms, applicable legislation of the Russian Federation.

The SEZ Management Company actively develops sustainable development agenda (ESG Agenda) in line with the United Nations Sustainable Development Goals (hereinafter — the UN SDGs), national sustainable development indicators and makes efforts to build a sustainable community in the region of presence, adhering to the principles of respect and observance of human rights.

The SEZ Management Company recognizes its responsibility to a wide range of stakeholders for cooperation on the sustainable development issues.

2. General Provisions and Scope

2.1. This Policy defines the Technopolis Moscow SEZ basic principles on human rights, mechanisms for their implementation in cooperation with the stakeholders, approaches to preventing and minimizing risks of the human rights violations and eliminating effects of such violations.

2.2. The Policy applies to managers of all levels and employees of the SEZ Management Company, regardless of their position. The Policy compliance is mandatory for all SEZ Management Company employees.

2.3. The Policy is one of the elements in shaping the infrastructure site model to promote sustainable development.

2.4. The Policy is issued as a part of the SEZ Management Company's implementation of the sustainable development agenda, in accordance with the Standard of Non-Financial Reporting Disclosure for Infrastructure Sites (industrial parks, industrial technology parks, special economic zones, territories of advanced socio-economic development) based on the Global United Nations indicators (goals) and National SDG indicators developed by Rosstat.

2.5. The Policy is an open, public document and is publicly available at the official Technopolis Moscow SEZ website in the Sustainable Development section.

2.6. The SEZ Management Company reserves the right to amend the Policy aiming at updating it.

2.7. The SEZ Management Company encourages efforts of the resident and leaseholder companies of the Technopolis Moscow Special Economic Zone to observe and protect human rights and freedoms and to take measures to declare their obligations in this area.

3. Terms and Definitions

The following terms, definitions and abbreviations shall be used throughout the text of this Policy:

Technopolis Moscow Special Economic Zone Joint-Stock Company	Technopolis Moscow SEZ Management Company or SEZ Management Company.
Special Economic Zone (SEZ)	A part of the territory of the Russian Federation, as determined by the Government of the Russian Federation, where a special mode of entrepreneurship is in effect, and where the special customs area regime may be applied.
Human rights	A system of universal rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion sex, nationality, religion or social status, which protects the dignity and freedom of each individual person.
Discrimination	Any differentiation, exclusion, restriction or preference based on race, sex, age, religious belief, ethnicity, social status, sexual orientation, nationality, social origin, economic status, political or other opinion, disability, place of birth or any other status.
Child Labor	Work performed by a person under the age of 16.
Forced Labor	Any work or service required of a person under the threat of any penalty and for which that person has not offered his or her services voluntarily (according to ILO Convention No. 29 on Forced or Compulsory Labor).
Stakeholders	Public authorities, shareholders, individuals, including sole proprietors, legal entities, regardless of their organizational and legal form and place of registration, associations, unions, public organizations, population of the region of presence, to a greater or lesser extent influencing the Special Economic Zone activity and results of such activity, as well as being influenced by the Special Economic Zone.
United Nations Sustainable Development Goals (SDGs)	17 Goals adopted as a part of the 2030 Agenda for Sustainable Development by the United Nations General Assembly in 2015.
National SDG indicators	A list of national SDG indicators developed in line with the United Nations General Assembly Resolution A/RES/71/313 of July 6, 2017 on development of the national SDG indicator sets based on national priorities, local conditions and available statistical capacity.

4. Policy Goals

The Policy is aimed at unconditional observance by the SEZ Management Company of internationally recognized human rights and freedoms, assistance in their realization and striving for their support in all areas of activity.

5. Basic Principles of the Policy

5.1. Respect for human rights and freedoms, non-discrimination.

The SEZ Management Company emphasizes respect for and observance of the human rights and freedoms, striving to identify and prevent human rights violations, humiliation of human dignity, including through preventive measures.

The SEZ Management Company supports prohibition of any form of restriction of human rights, freedoms and opportunities based on race, sex, language, nationality, place of birth, age, social and property status, political beliefs, religion, membership of unions, public associations, disabilities and other distinctive features.

The SEZ Management Company adheres to the equal opportunities concept and prevention of any form of discrimination, carrying out its activities in accordance with the applicable legislation of the Russian Federation and the City of Moscow.

5.2. Human Dignity.

The SEZ Management Company has zero tolerance for disrespectful, unethical and other inappropriate conduct, humiliating or otherwise infringing human dignity, unfair treatment of people, harassment of any kind. A disrespectful behavior is unacceptable both in the workplace and in any other non-work-related circumstances.

This principle applies not only to relations between the SEZ Management Company employees, but also to relationships with the representatives of the resident companies and leaseholders localized in the SEZ territory, business partners, public authorities, public associations, unions and representatives of the local community.

5.3. Community Rights and Interests.

The SEZ Management Company is committed to developing local communities and indigenous people by creating sustainable economic opportunities in the region of operations, through the implementation of the priority areas:

- Creating favorable conditions for sustainable development of high-tech sectors of the economy;
- Attracting Russian and foreign investment into Moscow economy;
- Building an ecosystem for sharing best practices of the companies' innovative potential through cooperation and development of local communities;
- Enhancing efficiency of the existing and prospective assets;
- Calling on the next generation to join Moscow production culture.

5.4. Occupational Health and Safety.

The SEZ Management Company ensures safe working conditions, compliance with safety standards, rules and internal requirements of occupational health and safety.

The SEZ Management Company supports environmental and workplace safety by preventing risks of accidents, injuries and health hazards to employees, identifying risk factors and eliminating occupational safety hazards by informing employees about safe work practices and the obligation to comply with them.

5.5. Inadmissibility of Child and Forced Labor.

The SEZ Management Company does not accept employment of individuals who have not reached the age established by the legislation of the Russian Federation and standards of the international law for hiring and employment.

Furthermore, observing the principle of non-acceptance of abusing the right, any form of harassment of the employees, use of various forms of the forced labor, the SEZ Management Company acts in strict compliance with the national and international legislation, local regulations on labor relations.

5.6. Equal Access to Work and Fair Remuneration.

The SEZ Management Company ensures equal, non-discriminatory access to labor, subject to qualifications and skills required for proper performance of the employment duties, as well as competitive salaries, access to corporate events and ample opportunities for training, professional and personal development. KPI system adopted by the Company gives its productive employees the opportunity to influence their level of remuneration.

In its activities, the SEZ Management Company strives to consistently ensure positive changes in the level of human well-being, taking into account the following social development areas:

- Maximum disclosure of the human potential through creation of the favorable conditions for career and professional development;
- Contributing to the sustainability of the employees' financial situation;
- Promotion of the healthy lifestyle, maintenance of physical and psycho-emotional health of the employees;
- Creating accessible and safe environment;
- Respect for the rights, freedoms and cultural specifics of the employees and population in the region of operation, participation in the implementation of public and government initiatives aimed at supporting local communities.

The SEZ Management Company carries out its activities in full compliance with the legislation governing remuneration, organization of the working hours and rest time, overtime work, benefits and guarantees for the employees.

6. Policy Implementation and Information

6.1. The SEZ Management Company maintains an open information exchange environment. This Policy promotes the principle of strict compliance with the legislation on human rights and freedoms, employment relationships, occupational health and safety.

6.2. The SEZ Management Company employees are entitled to ask questions and offer suggestions regarding the Policy or to report violations of the Policy to the management, Human Resources and Talent Development Department, Occupational Health and Safety Department, Legal Affairs Directorate or by sending information to the e-mail address office@technomoscow.ru.

The SEZ Management Company commits to deal with the situation in compliance with the corporate communication mechanisms, give a response to the employee and take necessary and sufficient measures as required by the situation.