

APPROVED

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SUPPLIER CODE OF BUSINESS CONDUCT
of Technopolis Moscow Special Economic Zone Joint-Stock Company

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1. Introduction

We, the Technopolis Moscow Special Economic Zone Joint Stock Company team, adhere to our mission and strategic priorities. We strive to pool together efforts of the representatives of business, scientific and educational community, public authorities and international partners to develop new high-tech sectors of the Russian economy.

Our actions are directed towards creating favorable conditions for sustainable development of the high-tech sectors of economy, attracting investments shaping an ecosystem for the best practices' exchange, developing innovative potential of the special economic zone resident companies and improving efficiency of the asset management. We also call on the next generation to join Moscow production culture.

We actively advance the Agenda for Sustainable Development (ESG Agenda) in line with the United Nations Sustainable Development Goals (hereinafter - the UN SDGs), national indicators for achieving the Sustainable Development Goals, and make efforts to build a sustainable community adhering to the principles of responsible environmental stewardship, sustainable production and consumption, responsible business and investment, and respect for and observance of the human rights.

We recognize our responsibility to a wide range of stakeholders to engage on sustainable development issues.

We expect our suppliers (contractors, providers) to share our sustainability principles and approaches, and we encourage their commitment to comply with such principles.

We expect our partners to implement sustainable development principles (ESG Principles) everywhere, including chaining sustainable supply of goods, works and services for the needs of the customer.

We also expect our suppliers (contractors, providers) to conduct their activities in strict compliance with the laws of the Russian Federation and applicable international standards and regulations.

Our principles of Sustainable Development reflect the following goals:

Ensure healthy lives and promote well-being for all at all ages;

Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation;

Make cities and human settlements inclusive, safe, resilient and sustainable;

Ensure transition to rational consumption and production models;

Taking urgent measures to combat climate change and its effects.

Values we hold:

Development: we set high goals, expand our competencies, and take the lead;

Trust: we value the trust of those who work with us;

Partnership: constructive dialogue with partners makes our projects and services better;

Teamwork: we value our team members, their competence and experience;

Openness: we stand for information openness, feedback development as a driver for business activity and goodwill building.

2. General Provisions and Scope

2.1. Supplier Code of Business Conduct (hereinafter referred to as the Code) defines basic principles that we expect suppliers (contractors, providers) to comply with to when interacting with

Technopolis Moscow Special Economic Zone Joint Stock Company (hereinafter referred to as the SEZ Management Company).

This Code is an element in shaping the infrastructure platform model aimed at achieving sustainable development goals.

2.2. The Code is aimed at promoting sustainable development practices in relation to the supply chain of goods, works and services procured by the SEZ Management Company.

2.3. The Code was issued as 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 UN indicators (goals) and National SDG indicators developed by Rosstat.

2.4. The Code is a corporate regulation and is publicly available on the official Technopolis Moscow SEZ website in the “Procurement” section.

3. Terms and Definitions

3.1. The following terms, definitions and abbreviations shall be used throughout this text for the purposes of this Code:

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.
Supplier (contractor, provider)	a legal entity or a private individual, including sole proprietor, supplying goods, performing works, rendering services to the Customer.
Stakeholders	government authorities, shareholders, private individuals, including sole proprietors, legal entities, regardless of their incorporation form and place of registration, associations, unions, public organizations, population of the region where the SEZ is located, affecting the SEZ activity and the results thereof to a certain extent, as well as being influenced by the SEZ.
United Nations Sustainable Development Goals (SDGs)	17 goals adopted as part of the 2030 Agenda for Sustainable Development by the UN General Assembly in 2015.
National SDG Indicators	a list of national SDG indicators developed in line with the UN General Assembly resolution ALTE S/71/313 of July 6, 2017 on the development of national SDG indicator sets based on national priorities, local conditions and available statistical capacity.

4. Code Application

4.1. Compliance by the supplier (contractor, provider) with the provisions of the Code is voluntary.

4.2. If the supplier (contractor, provider) takes a decision to join the Code, the SEZ Management Company expects it to sign the Supplier Code of Conduct Compliance Declaration during the period of contractual obligations for the supply of goods (works, services) in the form according to Appendix No. 1 to this Code and send it to the address of the SEZ Management Company.

4.3. The Supplier Code of Conduct Compliance Declaration is indefinite, and the Supplier (contractor, provider) has the right to revoke the Declaration at any time by notifying the SEZ Management Company in writing.

4.4. Upon signature by the supplier (contractor, provider) of the Supplier Code of Conduct Compliance Declaration, the SEZ Management Company expects the Supplier (Contractor, Provider) act as follows:

4.4.1. Filling out Sustainability Assessment Questionnaire (Appendix No. 2 hereto) to determine the level of environmental, social and corporate responsibility using the Technopolis Moscow SEZ official website Procurement section. The completed Sustainability Assessment Questionnaire should be sent to the SEZ Management Company using the Procurement section of the Technopolis Moscow SEZ official website.

The SEZ Management Company would expect to receive corresponding information within one year upon signature by the supplier (contractor, provider) of the Code Compliance Declaration and thereafter, provided that the supplier (contractor, provider) has not withdrawn its Declaration.

4.4.2. Informing the SEZ Management Company about plans and progress achieved in sustainable development in terms of environmental and social policy, corporate governance (its own initiatives, participation in sustainable development events), including proposals on experience exchange, initiative implementation.

4.4.3. Assistance in compliance with and implementation of the Code provisions in its supply chain.

4.5. The SEZ Management Company reserves the right to:

4.5.1. Give feedback to the supplier (contractor, provider) basing on the information provided on the plans and progress achieved in sustainable development, in accordance with p. 4.4.1.- 4.4.3. 4.4.1.- 4.4.3. of the Code.

4.5.2. Assess compliance with the provisions of the Code through internal assessment mechanisms.

4.5.3. Amend the Code aiming to update it.

5. Main Provisions

5.1. Legal Compliance.

Suppliers (contractors, providers) working with SEZ Management Company are obliged to strictly comply with all applicable laws and regulations in force in the territory of the Russian Federation, as well as all agreements, international standards and regulations that may be applicable in the context of their activities.

Service providers should observe the laws of the Russian Federation concerning service provision on the Technopolis Moscow SEZ territory, i.e. comply with the rules and requirements established for the provision of services on this territory.

Suppliers (contractors, providers) shall comply with international trade rules, including sanctions legislation, export control measures and antimonopoly legislation applicable in the Russian Federation.

5.2. Fighting Corruption.

Suppliers (contractors, providers) should strive to

- Comply with the anti-corruption principle of not offering, promising, giving or accepting any form of payment or incentive payment, either directly or through intermediaries, to gain an improper business advantage;

- Deliver zero tolerance for involvement in fraudulent schemes, bribery (including facilitation payments), money laundering, embezzlement, extortion or any other form of corruption. Suppliers (contractors, providers) shall comply with the principles and provisions contained in the international documents, such as the UN Convention against Corruption, as well as in the applicable national legislation, build a system of anti-corruption measures in accordance with the applicable legislation and internal corporate procedures;

- Avoid actions that may violate applicable anti-bribery or corruption laws, including initiating, participating in or facilitating such violations by their business partners.

5.3. Conflict of Interests.

Technopolis Moscow SEZ strives to establish fair and unbiased relations between all stakeholders.

Suppliers (contractors, providers) should endeavor to record information about any situation that may present a potential conflict of interest, which would also imply economic ties or personal relationships such as family, romantic or close personal ties between employees of the supplier (contractor, provider), employees of the SEZ Management Company or elected officials in the region where Technopolis Moscow SEZ operates.

Suppliers (contractors, providers) should be aware that a conflict of interest may create unfavorable business conditions and adversely affect the credibility and reputation of both the supplier (contractor, provider) and the SEZ Management Company.

Providing accurate information about potential conflicts of interest is an important step in preventing such situations and maintaining ethical standards of business conduct.

Suppliers (contractors, providers) shall disclose in good faith any existing or potential conflicts of interest to ensure transparency and prevent situations that could undermine trust and ethical business relationships.

5.4. Business Gifts.

In accordance with the SEZ Management Company's Regulation on Handling Conflict of Interest, the SEZ Management Company employee is forbidden to receive gifts from suppliers (contractors, providers), including those who have completed fulfillment of contractual obligations, private individuals and legal entities that are parties to legal proceedings involving the SEZ Management Company, and may not accept (present) gifts in the course of negotiating a deal in connection with the performance of their official duties. Any such actions are considered by the SEZ Management Company as a potential source of conflict of interest.

5.5. Procurement Procedures.

Suppliers (contractors, providers) shall not engage in unlawful cooperation with competitors, such as price fixing, bid rigging, market sharing agreements or any other prohibited acts that restrict free and fair competition.

The SEZ Management Company is committed to creating a favorable and fair business environment where competition is based on quality of goods and services, innovation, efficiency and providing the best conditions. Suppliers (contractors, providers) shall market their goods and services on

the basis of their competitiveness and shall not cooperate with competitors to distort competition or gain illegal advantages.

In case procurement proceedings violations are identified, the SEZ Management Company shall take due measures, including termination of cooperation with violators and passing information on the violation to the authorities.

5.6. Confidential Information.

Suppliers (contractors, providers) should strive to ensure safety of confidential information provided by the SEZ Management Company, use such information only in accordance with contractual obligations and take all necessary measures to protect it from unauthorized or unintended disclosure.

No disclosure of confidential information to third parties or using such information in one's own interests or in the interests of another party without prior written consent of the SEZ Management Company is allowed.

5.7. Quality and Safety of Goods and Services.

Suppliers (contractors, providers) shall strive to ensure compliance of the goods, works, and services sold with mandatory quality and safety standards adopted in the Russian Federation;

- ensure quality control and safety at all stages of production and delivery of goods, work performance, service provision.

- implement quality and safety management systems, including certification in compliance with international ISO standards;

- ensure delivery of goods, performance of works, rendering of services is in line with the specifications;

- disclose data on the composition, technical and qualitative characteristics of the products supplied, work performed, services rendered, confirmed by certificates, licenses and other documents.

5.8. Occupational Health and Safety.

Suppliers (contractors, providers) shall strive to provide employees with healthy and safe working conditions that meet the requirements established by the regulations, in particular:

- Take measures to reduce risks and prevent threats of injuries and occupational diseases, including fatal accidents;

- Develop internal health and safety documents that prioritize the life, health and well-being of the employees;

Improve safety standards and train employees in occupational health and safety standards.

5.9. Working Conditions and Workers' Rights.

Suppliers (contractors, providers) should strive to ensure continued suitability of the safe and compliant working conditions to current requirements of the legislation of the Russian Federation and accepted international standards, in particular:

- Provide health care services, opportunities to meet the needs of the employees in the workplace, necessary conditions for pregnant women, young mothers and persons with disabilities;

- Ensure cleanliness, light levels and air exchange in working areas and rooms, production facilities;

- Provide maintenance of equipment, monitor technical condition of the buildings and premises;

- Respect working time regulations and fair pay.

Suppliers (contractors, providers) shall strive to build labor relations with employees on the basis

of respect for human dignity, non-discrimination, observance of rights and legitimate interests, absence of humiliating working conditions and any forms of forced or compulsory labor, child labor and modern forms of slavery.

Unconditional adherence to internationally recognized human rights must be a basic priority.

5.10. Non-Discrimination.

Suppliers (contractors, providers) shall strive to comply with the principle of equal opportunities for all, not allowing discriminatory actions when making personnel decisions, regardless of race, nationality, gender, age, social and family status, religious beliefs, political views, other values and social factors.

5.11. Emergency Preparedness.

Providers (contractors, providers) shall endeavor to identify and assess potential emergencies and develop appropriate response procedures for all of their facilities and areas of operation, including the following:

- Emergency reporting.

A reporting system that facilitates emergency detection and reporting in a timely manner.

- Employee notification and evacuation procedures.

Public announcement and evacuation system (evacuation plan) for prompt and safe leaving the danger zone.

- First Aid Supplies.

Having appropriate first aid supplies for emergency medical care in case of an emergency.

- Fire detection and suppression equipment.

Special equipment for quick and effective response to a fire.

- Training and drills.

Regular training and drills for employees in case of emergency.

- Emergency exit routes.

Emergency exit routes should be clearly marked, preferably using infographics, for quick and error-free evacuation guidance.

5.12. Environment and Biodiversity.

Suppliers (contractors, providers) shall strive to comply with environmental legislation and international environmental obligations of the Russian Federation, develop corporate environmental responsibility programs, improving and assessing environmental and social performance both in their own business operations and throughout the supply chain.

Activities that may be taken by suppliers (contractors, providers) shall include implementation of best practices or sustainable development initiatives aimed at optimizing the use of energy, water resources and materials used in economic activities in order to mitigate adverse impact on the environment (reduce greenhouse gas emissions, use water resources rationally, ensure their treatment and recycling, reduce waste generation).

Suppliers (contractors, providers) may take efforts to restore damaged or lost ecosystems in the territory of presence, monitoring the impact of their activities on biodiversity and ecosystems to identify potential threats to living organisms and take appropriate measures to protect them.

Suppliers (contractors, providers) shall strive to avoid practices that may be harmful to biodiversity and ecosystems, including banning or restricting the use of harmful chemicals, reducing waste and polluting emissions that negatively impact the environment and biodiversity.

5.13. Social Policy.

Suppliers (contractors, providers) shall strive to ensure sustainable positive changes in human well-being in their activities, taking into account the following aspects of social development:

- Maximum disclosure of the human potential through the creation of 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 secure environment at the organization's location;
- 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.

5.14. Economic Efficiency and Innovation.

The principle of innovation and economic efficiency in terms of sustainable development means that suppliers (contractors, providers) should strive to develop and/or apply technological solutions that both reduce the burden on the environment and ensure economic performance.

Companies should strive to encourage innovation and conduct research to develop new environmentally and socially responsible technologies, products and services.

Suppliers (contractors, providers) shall strive to implement environmentally effective technologies and approaches to use resources efficiently, reduce waste generation, reduce emissions, improve energy efficiency, and strive to apply circular economy principles with reuse of resources, including such practices as recycling and reuse of materials, production and/or sale of durable and repairable goods, as well as product lifecycle management.

5.15. System Approach.

Suppliers (contractors, providers) shall strive to maintain a culture of professional ethics and compliance, ensure sufficient controls over conformity of their activities to applicable laws and accepted standards, including this Code, in all relationships with counterparties, including their own supply chains.

5.16. Business Practices and Business Ethics.

In order to develop supply chains, suppliers (contractors, providers) should observe a fair competition principle, avoid illegal forms of economic struggle, comply with the rules of participation in procurement procedures, and avoid conflicts of interest that may adversely affect the company's reputation.

Relationships with counterparties and other stakeholders should be built in compliance with generally accepted norms of business conduct, based on the principles of fairness and honesty.

5.17. Information Disclosure.

Suppliers (contractors, providers) shall strive for open conduct of their activities, constructive interaction with the stakeholders, observance of the balance of interests, including through regular disclosure of information on key aspects of their activities and on sustainable development issues in order to inform a wide range of the stakeholders about their steps taken and results achieved in this area.

**Sample
Supplier (Contractor, Provider)
Code of Conduct Compliance Declaration**

Technopolis Moscow SEZ JSC

On the Company's letterhead ¹

On following provisions of the
Supplier Code of Business Conduct

Declaration

(name of the organization) hereby by signing this Technopolis Moscow JSC Supplier Code of Business Conduct Declaration expresses its desire to cooperate with Technopolis Moscow SEZ JSC on the basis of mutual trust, ethics and responsibility, shares basic principles and approaches of Technopolis Moscow SEZ JSC for sustainable development and declares its intent to strive to implement sustainable development principles in its operations.

(name of the organization) expresses its willingness to engage in an open dialogue with Technopolis Moscow SEZ JSC for sustainable development and compliance with this Code.

(name of the organization) recognizes the right of the Technopolis Moscow SEZ JSC to assess compliance with the provisions of the Code through internal assessment mechanisms and make amendments to the Code in order to update it.

Contact person from *(name of the organization)* - name, surname, email, phone number.
Director General ²

(signature) (full name)

¹ Declaration is drawn up on the letterhead of the organization with the date and number (if any).
² Or another position of the sole executive body of the organization (director, president, etc.).

**Sustainable Development Assessment Questionnaire
of the Technopolis Moscow SEZ JSC supplier (contractor, provider).**

Technopolis Moscow SEZ JSC, as the Management Company of the Special Economic Zone, is committed to work towards the achievement of the Sustainable Development Goals (United Nations SDGs).

One of the sustainable development priorities is supply chain sustainability, including the analysis of suppliers (contractors, providers) for compliance of their business and management processes with sustainability requirements, including environmental and social considerations, as well as business conduct standards.

This Questionnaire is designed to assist in building a sustainable supply chain of products (works, services) for the needs of the SEZ Management Company and involving organizations of various forms of ownership in solving sustainable development tasks, analyzing information on the level of environmental, social and managerial responsibility.

For reference:

1. The Questionnaire is filled out by the supplier organization (contractor, contractor) independently and on a voluntary basis.
2. Scoring and assessment are for informational purposes only and do not entail legal implications for the interacting parties.
3. Documents and informational materials confirming compliance with the criteria specified in the Questionnaire are not exhaustive, are indicated as justification for the response and do not impose additional obligations.

Calculation Formulas:

Section Score (S_s) = Sp No. / Msp No. * 100%

Where:

Sp is the sum of all the points actually received in the section

Msp is the maximum possible amount of points in the section

No. is the section number

Total Score $TS = \frac{S_1+S_2+S_3}{3}$

Name of the supplier (contractor, provider)organization:

No.	Indicator	Supporting document (corporate document, informational material, Internet link, publication)	Score (1- match, 0- non-match)
1	Environmental Block		
1.1.	Environmental Management		
1.1.1.	Corporate environmental policy, other regulations or standards that define the goals, principles, tasks and mechanisms for implementing the organization's environmental policy, commitments to environmental protection and environmental safety	Corporate Document or Standard	
1.1.2.	Environmental management system: valid ISO 14001 certificate. GOST R 14001 or functioning quality management system in place	Certificate of Conformity	
1.1.3.	No fines for violations of environmental legislation	Confirmation Letter	

1.1.4.	Having a goal/plan to reduce greenhouse gas emissions	Corporate Document (Plan or Program)	
1.1.5.	Measures to reduce greenhouse gas emissions (compensatory measures, measures to mitigate the adverse impact on the climate)	Corporate document (Plan or Program)	
1.1.6.	Greenhouse gas emissions are calculated by the entity Information required to generate a greenhouse gas emissions report is collected.	Information on greenhouse gas emissions (Scope 1.2)	
1.2.	Energy Efficiency		
1.2.1.	Energy efficiency measures (energy consumption reduction/optimization) developed and implemented	Action plan or program for energy efficiency (reduction/optimization of energy consumption)	
1.2.2.	Energy management system: valid ISO 50001 certificate or a functioning QMS system in place	Certificate of Conformity	
1.2.3.	Use of electricity from renewable energy sources (RES)	In-house facilities RES/supporting documents on RES-electricity consumption	
Section 1 Environmental Block Score			
2	Social Block		
2.1.	Occupational Safety and Health Protection		
2.1.1.	Corporate policy, other corporate documents or standards on occupational safety and (or) occupational safety management system in place	Corporate Document or Standard	
2.1.2.	Occupational Safety and Health Management Systems: valid ISO 45001 certificate. GOST R ISO 45001 or a functioning QMS system in place	Certificate of Conformity	

2.1.3.	Social management system: valid ISO 26000 certificate or a functioning QMS in place	Certificate of Conformity	
2.1.4.	Personnel (including managers and specialists) are trained and certified in occupational health and safety, fire and industrial safety, electrical safety, etc.	Protocols on completion of labor protection knowledge testing, industrial, fire, and electrical safety and other standards, as prescribed by the Russian legislation	
2.1.5.	Uniform standards or requirements for working conditions in accordance with legislative, regulatory and other requirements	Standards/requirements for working conditions	
2.1.6.	Standards and/or programs to improve occupational safety and reduce occupational injuries	Program, standard, or plan	
2.1.7.	Recording and monitoring of occupational injury rates, including fatalities	Annual statistical reporting forms No. 1-T (working conditions) and No. 7- injury rate.	
2.2.	Working conditions		
2.2.1.	Labor relations management in compliance with the employment laws and regulations (employment contract conclusion/termination, job descriptions, professional development)	Standard employment contract and related documentation	
2.2.2.	Established working hours	Policy or another corporate document	
2.2.3.	Flexible working hours available		
2.2.4.	Remote work option		
2.2.5.	Financial incentive measures		
2.2.6.	Financial assistance		
2.2.7.	Additional child care allowance		
2.2.8.	Voluntary Health Insurance		
2.2.9.	Accident Insurance		

2.2.10.	Staff turnover for the previous year is below 30%	Confirmation letter from the HR manager and/or head of the organization / report	
2.2.11.	Claims from employees (teams of employees) related to labor law violations (over the last 12 months)	Written confirmation	
2.2.12	Professional training, retraining, advanced training, training on sustainable development	Written confirmation	
2.3.	Quality and safety of products (works, services)		
2.3.1.	Quality management system: valid ISO 9001 or GOST R ISO 9001 certificate	Certificate of Conformity	
2.4.	Human rights		
Policy, other corporate documents or standards setting out objectives, principles and commitments on internationally recognized human rights, labour rights and non-discrimination, including:			
2.4.1.	Respect for internationally recognized human rights	Corporate Document or Standard	
2.4.2.	Avoidance of any form of discrimination on the grounds of gender, race, religion or ethnicity		
2.4.3.	Prohibition of any forms of forced labor, child labor and modern forms of slavery as defined by international and Russian legislation		
2.4.4.	Compliance with the wages and salaries laws and regulations		
2.4.5.	Procedure for registering staff complaints on human rights issues	Hotline phone number, e-mail	
Section 2 Social Block Score			
3.	Corporate Governance		
3.1.	Business Conduct and Anti-Corruption		
3.1.1.	Anti-corruption policy, other corporate documents or standards on anti-corruption	Corporate Document	
3.1.2.	Code of Business Conduct or other corporate document establishing general principles of professional ethics and basic rules of business conduct of the entity's employees	Corporate Document	

3.1.3.	Policy on Handling Conflict of Interest or another corporate document that establishes measures to regulate, prevent and avoid conflicts of interest	Corporate Document	
3.1.4.	Anti-bribery management system: valid ISO 37001 certificate or a functioning QMS in place	Certificate of Conformity	
3.1.5.	Sustainability policy/strategy/standards of the organization in place	Corporate Document	
3.1.6.	Action plan for Sustainable Development Goals in place	Corporate Document	
3.1.7.	Regular disclosure of information on sustainable development issues to raise awareness among stakeholders	Annual reports posted on the organization's website, available for review by all stakeholders	
Section 3 Corporate Governance Score			
Total Score			
Full name of the responsible person from the organization:			
Contact details of the responsible person:			
Questionnaire date:			