

MOEX

MOSCOW
EXCHANGE

SUSTAINABILITY REPORT | 2022

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MOSCOW EXCHANGE 2022 SUSTAINABILITY REPORT

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OVERVIEW OF MOSCOW EXCHANGE GROUP'S REPORTING SUITE

2022 Annual Report

The [2022 Annual Report](#) provides comprehensive information on the business model, strategic priorities, products, corporate governance system, and operational and financial results of Moscow Exchange Group for the year ended 31 December 2022.

2-3

2022 financial statements

The [2022 financial statements](#) describe Moscow Exchange Group's financial position as of 31 December 2022.

Investor presentations

The [2022 investor presentations](#) outline trends in Moscow Exchange Group's key operational and financial results, describe products and services for customers, and present the Group's position on the global market.

THE 2022 SUSTAINABILITY REPORT

2-3 2-14

Moscow Exchange (MOEX) published its fourth sustainability report (the "Report") not later than 30 June 2023, which contains information on its responsible business practices in the calendar year ended 31 December 2022. It is an important tool for communicating with stakeholders.

The Report also provides information on the mission and strategy of Moscow Exchange, management approaches, and key events in the reporting year. It sheds light on significant topics¹ such as responsible investment, decent working conditions, sustainable financial infrastructure, financing, and corporate governance. Likewise, it describes the position of the Group regarding climate change, discerning use of resources, charity, and other environmental and social issues.

The Group publishes a sustainability report every year. The previous report was published in June of 2022.

In accordance with the Charter of the Moscow Exchange, the authority to approve the report is vested in the Executive Board.

2-5

The 2022 Moscow Exchange Sustainability Report was made with professional assurance of FBK LLC, an independent auditor, to insure² that the qualitative and quantitative information contained in the Report is disclosed accordance with the GRI Standards and the SASB Security & Commodity Exchanges standard (for selected information). The auditor's report, which provides limited assurance regarding selected information, is included as an appendix to this Report.

OVERVIEW OF
MOSCOW EXCHANGE
GROUP'S REPORTING SUITE

2022 SUSTAINABILITY
PERFORMANCE
HIGHLIGHTS

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APPENDICES

Structure of the Report

For the convenience of the Report's users, the Group has decided to use a similar structure to that of its 2021 Sustainability Report; accordingly, there are three main sections: 2022 Sustainability Performance Highlights, Sustainability Data, Sustainability Approaches and Procedures. The appendices include Statements, GRI Content Index, SASB Metrics, Independent Auditor's Report, Glossary, and Contact Details.

2022 Sustainability Performance Highlights

This section presents key initiatives and achievements of Moscow Exchange in 2022. These were implemented in line with the Group's Sustainability Roadmap. The section also describes measures taken to apply ESG principles in accordance with the 2024 Group Strategy. The section contains information on Moscow Exchange's plans and objectives for 2023 and in the midterm.

Sustainability Data

The section discloses the key metrics of the company's sustainability performance in 2019, 2020, 2021 and 2022. The structure of this section corresponds to the 2022 Sustainability Performance Highlights section, as well as the Sustainability Approaches and Procedures section.

Sustainability Approaches and Procedures

This section provides information on the approach of Moscow Exchange at the management level to key areas of sustainable development (SD), including an overview of corporate policies, codes, procedures, and responsible departments. The information in this section supplements the 2022 Sustainability Performance Highlights section, the Sustainability Data section, and Moscow Exchange's 2022 Annual Report.

Statements

Moscow Exchange Group supports a number of international initiatives and organisations; it shares their principles, integrating their requirements and recommendations into its activities. The Statements appendix outlines the Group's position on a number of vital issues, including:

- Statement of Moscow Exchange on compliance with the principles of the UN Global Compact;
- Statement of Moscow Exchange on respect for human rights and counteracting modern slavery.

GRI content index

This index consolidates all the GRI disclosures published in the Report, allowing for easier navigation through its sections. It also contains remarks on the disclosures.

SASB metrics

This index includes metrics pertinent to the SASB Security & Commodity Exchanges standard.

Guidelines and standards used in preparing the Report

This Report was prepared in accordance with the GRI Standards: Core option; however, the requirements and recommendations of other standards and guidelines were taken into account as well. These include the WFE ESG Guidance & Metrics (2018), the SASB Security & Commodity Exchanges standard (2018), and the Task Force on Climate-related Financial Disclosures (2017).

2-4

When preparing the 2022 Report the Group the following changes were made:

- the Sustainability Data section includes the volume and number of trades on the National Mercantile Exchange due to the inclusion of certain data of this subsidiary in the reporting perimeter;
- the share of percentage of trades generated from automated trading systems in the foreign exchange market indicator is calculated from the volumes in the spot foreign exchange market instead of calculating the share of the total volumes in the spot and swap segments of the foreign exchange market.

¹ For detailed information on material topics, see the MOEX Group's approach to materiality subsection.

² The audit was carried out in accordance with ISAE 3000 (revised): "Assurance Engagements Other than Audits or Reviews of Historical Financial Information".

- The “Percentage of employees at the end of the year who passed a formalised performance assessment” indicator GRI 404-3 for 2022 was calculated from the number of all employees of the Moscow Exchange Group, and the same indicator for 2019–2021 was calculated from those employees who were assigned a formalised performance assessment, not including employees on parental leave, trainees and those laid off before the assessment is completed.

Reporting boundaries

2-2

The reporting boundaries include the following entities of Moscow Exchange Group: Moscow Exchange, the National Settlement Depository (NSD), and the National Clearing Centre (NCC) and the National Mercantile Exchange (NAMEX).

The Report does not include seven other companies, the financial results of which are included in the consolidated financial statements of the Moscow Exchange Group, due to the fact that these companies employ less than 0.5% of the Group’s headcount.

2-1

In this Report, “Moscow Exchange” and “MOEX” mean the organisation whose full corporate name as stated in its Charter is Public Joint-Stock Company Moscow Exchange MICEX-RTS. “Moscow Exchange Group”, or simply the “Group”, means the pool of companies that are part of Moscow Exchange Group; they fall within the scope of this Report.

Information about shareholders who own five or more percent of MOEX capital is included in the subsection “Genuine corporate governance and business ethics” of the section “2022 Sustainability Performance Highlights” of the current report.

The boundaries of the indicators are indicated in the Sustainability Data section. Any information that pertains to different combinations of subsidiaries is accompanied by appropriate disclaimers.

2-2

The reporting information is disclosed within two reporting perimeters:

- the first perimeter comprises information pertinent to Moscow Exchange, NSD, NCC and NAMEX;
- the second perimeter comprises information pertinent to Moscow Exchange.

MOEX GROUP’S APPROACH TO MATERIALITY

3-1 3-2 2-14

Determining material topics for the Report is an essential part of preparing non-financial statements as per the GRI Standards. The purpose of this procedure is to study and identify the economic, environmental, and social issues that are most impacted by Moscow Exchange on its stakeholders.

The new GRI standards that came into force required a new prioritisation of material topics based on a combination of negative and positive impacts on stakeholders. The Moscow Exchange Group Sustainable Development Goals Working Group (SDG WG), formed by the Executive Board’s decision dated 16 November 2021 (Minutes No. 84), conducted a four-step procedure to identify material topics.

Step 1

Defining the context of the activities

- Analysis of all sustainable development objectives of the MOEX Group
- Linking of objectives to the UN Sustainable Development Goals
- Analysis of the proposed topics in the GRI and SASB standards
- **Identification of the stakeholders** affected by each objective
- Identification of **29 potential** sustainability topics related to Moscow Exchange business

Step 2

Identifying actual and potential impacts

- Analysis of the sources of feedback from the following stakeholders:
- **Regulators and government authorities:** Bank of Russia recommendations, SD legislation and bylaws
 - **Stakeholders and investors:** investor perception surveys
 - **Professional associations and ESG agencies:** assessment criteria for ESG agencies and recommendations from associations
 - **Employees:** employee engagement assessments and other staff surveys
 - **Market participants and their clients:** resulting satisfaction score
 - **Issuers:** issuer survey on ESG awareness

Step 3

Assessing the significance of actual and potential impacts

- Conducted a **survey of 12 managers** of the MOEX Group Sustainability Goals Working Group to identify:
- potential and actual **positive** impacts on stakeholders
 - potential and actual **negative** impacts on stakeholders

Step 4

Defining priorities

- **Testing and validation** of material topics by the expert group
- Approval of material topics by the SDG Working Group
- **Disclosure and professional assurance** of indicators of material topics in the Sustainability Report

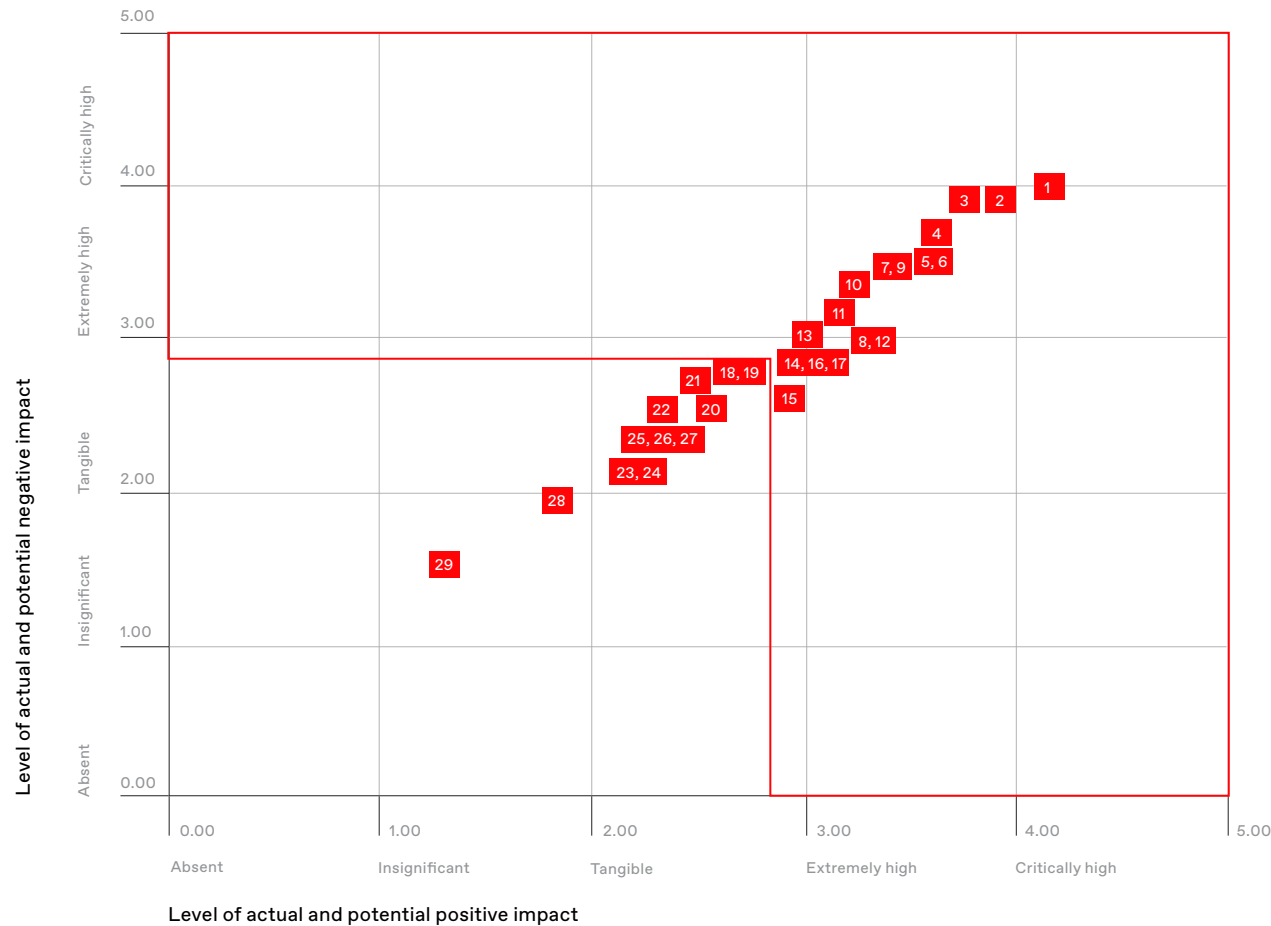
The list of analysed topics was expanded from 16 in the 2020¹ analysis to 29 topics; of these, 17 were recognised as material based on the stakeholder impact criterion. Based on the results of prioritisation, the list of material sustainability topics was approved by a decision of the Moscow Exchange Executive Board dated 25 April 2023 (Minutes No. 29).

New substantive topics have been converted into 22 objectives of the 2023 Sustainability Roadmap.

¹ The matrix and the list of material topics for the last reporting period may be found in Sustainability Report of Moscow Exchange 2021: <https://fs.moex.com/files/24514/>.

Materiality Matrix

- The new GRI Standards (2021) require to distinguish the sustainability topics by the significance of actual and potential, negative and positive impacts on the stakeholders.
- The integral rating of the material topic is calculated as the sum of the levels of positive and negative impact on the stakeholders.
- All of the material topics with an integral impact rating above 5.5 are rated as material.
- Indicators of non-material topics may be disclosed in the sustainability report but are not covered by professional assurance.



Material topics

- | | |
|---|--|
| 1 information security | 10 fair labour relations |
| 2 sustainable technological development | 11 ensuring diversity and equal opportunities for staff |
| 3 compliance with laws and regulations | 12 sustainability sector and ESG-indices |
| 4 ensuring the health, safety and well-being of staff | 13 carbon units market |
| 5 financial literacy | 14 staff training and development |
| 6 quality of corporate governance | 15 equal opportunities and human rights |
| 7 public and regulatory policy influence | 16 management of sustainable development risks |
| 8 development of business ethics and compliance culture | 17 investments to innovation, small and medium-sized enterprises (SME) |
| 9 stimulating ESG-practices | |

Non-material topics

- | | |
|--|---|
| 18 sustainable supply chain | 24 respect for human rights by security personnel |
| 19 sustainable development partnerships | 25 support for freedom of association and collective bargaining |
| 20 marketing communications | 26 recycling and reuse of materials |
| 21 economic impact on the region of presence | 27 customer health and safety |
| 22 charity and sponsorship | 28 biodiversity conservation activities |
| 23 achievement of environmental efficiency | 29 rights of indigenous peoples |

Material topics

Impact rating	Topic name	Impacted stakeholders	GRI and SASB standards
8.58	1. Information security	Market participants and their clients	GRI 418 : Customer Privacy (2016) FN-EX-550a.2
7.92	2. Sustainable technological development	Market participants and their clients Moscow Exchange shareholders and investors	FN-EX-410a.1 FN-EX-550a.1 FN-EX-000.A FN-EX-000.B
7.75	3. Compliance with laws and regulations	Regulators and state authorities (Bank of Russia, Federal Executive and Legislative Bodies)	
7.17	4. Ensuring the health, safety and well-being of staff	Employees	GRI 403 : Professional Health and Safety (2018)
7.17	5. Financial literacy	Market participants and their clients Residents of the region of presence	GRI 413 : Local Communities (2016) GRI 203 : Indirect Economic Impacts (2016)
7.08	6. Quality of corporate governance	Moscow Exchange shareholders and investors	
6.67	7. Public and regulator policy influence	Regulators and state authorities (Bank of Russia, Federal Executive and Legislative Bodies) Professional Associations and ESG-Agencies Development institutions and International Organisations	GRI 415 : Public Policy (2016)
6.58	8. Development of business ethics and compliance culture	Employees	GRI 205 : Anti-corruption (2016) GRI 206 : Anti-competitive Behavior (2016) FN-EX-510a.1 FN-EX-510a.2
6.33	9. Stimulating ESG-practices	Issuers Professional Associations and ESG-Agencies	GRI 203 : Indirect Economic Impacts (2016) FN-EX-410a.3 FN-EX-410a.4 FN-EX-510a.1
6.33	10. Fair labour relations	Employees	GRI 401 : Employment (2016) GRI 402 : Labour Management Relations (2016)

¹ The integral rating of a material topic is calculated as the sum of the levels of positive and negative impact on stakeholders.

Impact rating	Topic name	Impacted stakeholders	GRI and SASB standards
6.17	11. Ensuring diversity and equal opportunities for staff	Employees	GRI 405 : Diversity and Equal Opportunity (2016) GRI 406 : Non-discrimination (2016)
6.17	12. Sustainability sector and ESG-indices	Issuers Market participants and their clients	GRI 203 : Indirect Economic Impacts (2016)
5.92	13. Carbon units market	Issuers Market participants and their clients Regulators and state authorities (Bank of Russia, Federal Executive and Legislative Bodies) Development institutions and International Organisations	GRI 203 : Indirect Economic Impacts (2016)
5.83	14. Staff training and development	Employees	GRI 404 : Training and Education (2016)
5.83	15. Equal opportunities and human rights	Issuers Employees	GRI 408 : Child Labour (2016) GRI 409 : Forced or Compulsory Labour (2016)
5.83	16. Management of sustainable development risks	Moscow Exchange shareholders and investors	GRI 201 : Economic Performance (2016)
5.75	17. Investments to Innovation, small and medium-sized enterprises	Issuers Development institutions and International Organisations	GRI 203 : Indirect Economic Impacts (2016)
Other material topics that can be disclosed selectively			
5.25	18. Sustainable supply chain	Suppliers and contractors	GRI 308 : Supplier Environmental Assessment (2016) GRI 414 : Supplier Social Assessment (2016)

Impact rating	Topic name	Impacted stakeholders	GRI and SASB standards
5.25	19. Sustainable development partnerships	Professional Associations and ESG-Agencies Development institutions and International Organisations	
5.00	21. Economic impact on the region of presence	Residents of the region of presence Regulators and state authorities (Bank of Russia, Federal Executive and Legislative Bodies)	GRI 201 : Economic Performance (2016) GRI 202 : Market Presence (2016) GRI 207 : Tax (2019)
4.75	22. Charity and sponsorship	Residents of the region of presence	GRI 203 : Indirect Economic Impacts (2016)
4.50	23. Achievement of environmental efficiency	Residents of the region of presence	GRI 302 : Energy (2016) GRI 303 : Water and Effluents (2018) GRI 305 : Emissions (2016) GRI 306 : Waste (2020)
4.42	25. Support for freedom of association and collective bargaining	Employees	GRI 407 : Freedom of Associations and Collective Bargaining (2016)
4.42	26. Recycling and reuse of materials	Residents of the region of presence	
3.83	28. Biodiversity conservation activities	Residents of the region of presence Professional Associations and ESG-Agencies	GRI 304 : Biodiversity (2016)

2022

SUSTAINABILITY PERFORMANCE

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STATEMENT FROM THE CHIEF EXECUTIVE OFFICER

2-22

Dear colleagues,

In 2022, Moscow Exchange continued to contribute to the development of the Russian financial sector. Our efforts to support investment activity and expand the range of services and exchange-traded instruments available to investors make a significant contribution to the sustainability of the Russian economy.

One of Moscow Exchange’s key performance indicators is the great trust from market participants. Therefore, in 2022, Moscow Exchange focused on maintaining business continuity: at the end of 2022, the IT system availability rate was 99.99%.

Despite the practical absence of foreign investors in 2022, the demand for securities related to environmental and social projects persisted. This can be seen in the Sustainability Sector, where bonds of more than RUB 100 billion volume were placed in 2022, with a total of RUB 276 billion of securities traded in the sector at the end of the year.

In times of uncertainty, it is particularly important to support and promote investment to SMEs and innovative companies. We therefore continued to develop the Growth Sector and the Innovation and Investment Market (IIM) during the reporting period. At the end of 2022, 49 bond issues of 33 small and medium-sized companies were traded in the Growth Sector. The total volume of securities placed was RUB 5.6 billion. In 2022, 25 SME issuers received subsidies to cover part of their expenses related to bond issue process and coupon payment totalling over RUB 420 million. The total trading volume of securities in the Innovation and Investment Market was over RUB 225 billion.

As part of the fight against global climate change, the Group continued to implement measures to develop the Russian carbon units market. In September 2022, the first on-exchange trades in carbon units were made at auctions run by the National Mercantile Exchange. Among other activities within Moscow Exchange’s climate agenda is switching offices and data centres (DCs) to green contracts. By the end of 2022, over 72% of the Group’s electricity consumption was covered by renewable energy sources (RES).

With the continued influx of individual investors into the Moscow Exchange markets, educational initiatives and training events take on particular social significance. In the reporting period, more than 250 financial literacy events were held, reaching around 500,000 people.

A Memorandum of Social Responsibility was drafted in 2022 and approved in early 2023, declaring respect for human rights, gender equality and socio-cultural diversity.

I thank our employees, partners and representatives of all stakeholders for their contribution in the development of Moscow Exchange and their support in 2022. We are sure that the implementation of measures to achieve sustainability goals is a valuable contribution by Moscow Exchange to the development of the Russian economy and helps us remain a reliable and responsible financial market participant. There is no doubt that this work will continue, with new ambitious objectives ahead of us in the area of ESG transformation of our business.

Chief Executive Officer
Moscow Exchange
Yury Denisov

INTEGRATING ESG PRINCIPLES INTO THE 2024 GROUP STRATEGY

MISSION AND PRIORITIES OF THE 2024 STRATEGY

In 2022, Moscow Exchange Group continued to implement its 2024 Group Strategy, which was approved by the Supervisory Board in 2019. The Strategy identifies two areas of responsibility for the Group and three areas of development, which correspond to the Group’s mission and vision.

The Group’s mission is to bring trust, efficiency, and innovation to financial markets, as well as to help companies and the public achieve sustainable prosperity. The Group’s vision is to be the leading platform for the Russian financial market, providing reliable access to all traded asset classes, and to meet a wide range of clients’ financial needs.

Priorities of the 2024 Group Strategy

Financial platform	Core market penetration	Culture of trust and responsibility	MISSION
Moscow Exchange plans to expand its infrastructure with respect to financial assets; it also intends to broaden its range of services to include more savings instruments and information assets.			
Balance sheet management			
Moscow Exchange plans to create a single interface that provides flexible services for finding liquidity, executing orders, and post-trading. It also plans to develop a platform with convenient tools for investing funds profitably and managing investments.	WE BRING TRUST, EFFICIENCY AND INNOVATION TO FINANCIAL MARKETS, HELPING COMPANIES AND PEOPLE ACHIEVE SUSTAINABLE PROSPERITY	3 Areas of development	2 Areas of responsibility
Market gateway			
Moscow Exchange intends to develop services that provide market participants with new opportunities to promote their services, also offering private investors an interface for accessing the financial market in a single information field.	1 Mission	2 Areas of responsibility	1 Mission

Consistently implementing the 2024 Group Strategy will enable Moscow Exchange Group to increase its customer base, promote the development of financial markets, increase the availability of financial services for issuers and investors, stimulate uptake of best practices, and ensure that Moscow Exchange's business model remains highly efficient and profitable.

THE ROLE OF THE SUSTAINABLE DEVELOPMENT AGENDA IN THE 2024 GROUP STRATEGY

Since 2020, Moscow Exchange Group has been actively integrating Environmental, Social and Governance (ESG) and sustainable development principles into strategic planning, corporate governance, risk management, personnel management, and other areas of its activities.

The Group's Management has assessed the impact on the strategic plans of the complex geopolitical situation unfolded in 2022; however, it intends to continue implementing the key projects of its Sustainability Roadmap.

Moscow Exchange is currently deepening its process for preparing non-financial statements. It has also been improving the quality, completeness, and transparency of non-financial disclosures, which cover the results of the sustainability projects envisaged by the 2024 Group Strategy.

MOSCOW EXCHANGE'S SUSTAINABILITY ROADMAP

On 1 July 2022, the Executive Board of Moscow Exchange approved an updated Sustainability Roadmap for Moscow Exchange Group for 2022 (the "Roadmap"). The document outlines the Group companies' key sustainability activities related to the UN Sustainable Development Goals (SDGs), key projects and 62 indicators of their implementation (metrics), and defines the responsibility of the business units for the progress of the projects.

On 25 April 2023, the Moscow Exchange Executive Board approved the 2022 Roadmap Progress Report prepared by the Moscow Exchange Sustainable Development Goals Working Group (the "SDG WG"). Having analysed 62 metrics of the 2022 Sustainability Roadmap, the SDG WG made the following conclusions:

- 32 target metrics were achieved with no change in timing or parameters (27 were in the plan);

- 21 target metrics were implemented according to the pessimistic scenario or postponed (26 were on the plan);
- 9 metrics were cancelled (9 were in the plan).

At the same Moscow Exchange Executive Board meeting, the 2023 Roadmap was approved, comprising of 59 metrics across 22 objectives in five groups and topics.

In developing the 2023 Sustainability Roadmap, the SDG WG also changed the grouping of objectives to build the acronym in both Russian and English.

MAINSTREAMING THE SUSTAINABILITY OBJECTIVES OF THE MOSCOW EXCHANGE GROUP

G

Genuine corporate governance and business ethics

- G1 Corporate governance system
- G2 Business ethics and compliance
- G3 Supply chain management
- G4 Expanding sustainability partnerships

R

Respect for human rights, equal opportunities and staff engagement

- R1 Employee engagement and efficiency
- R2 Learning and development
- R3 Diversity and equal opportunities
- R4 Health, safety and well-being of employees

E

Environmentally friendly and trusted market infrastructure

- E1 Risk management
- E2 Information security
- E3 Sustainable technological development
- E4 Eco-efficiency and low-carbon development
- E5 Market access and customer outreach

A

Advanced practices of responsible investing

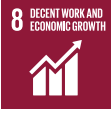
- A1 Development of exchange-based sustainable financing
- A2 ESG indices and market data
- A3 Growth and IIM sectors
- A4 Registry for and trading in carbon units
- A5 Communication of sustainability trends, standards and practices to issuers
- A6 Improvement of Moscow Exchange's ESG disclosure and ESG ratings

T

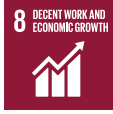
Trusted relations with local communities

- T1 Financial literacy of retail investors
- T2 Charity and sponsorship
- T3 Business, educational and image-making events

IMPLEMENTATION OF THE MOSCOW EXCHANGE SUSTAINABILITY ROADMAP IN 2022

UN SDGs and topic number	Objectives and impact rating	Stakeholders	Activities	Implemented in 2022
Genuine corporate governance and business ethics				
G1 	Corporate governance system (7.08)	Moscow Exchange shareholders	Improving gender balance in corporate governance bodies Conducting an evaluation (internal and external) of the Supervisory Board	Increase in the proportion of women on corporate governance bodies from 20% to 21% Increased level of efficiency of the Supervisory Board's performance based on the assessment
G2 	Business ethics and compliance (6.6)	Employees Market participants and their clients Suppliers and contractors	Preparing for a second (supporting) audit of ISO 37301 Compliance Management Systems Conducting an event to improve the compliance culture in the Moscow Exchange Group	Percentage of employees who successfully completed anti-corruption training: 99% ISO 22301, ISO 37301: NCC certification audit, supporting audit of Moscow Exchange Percentage of incidents of possible violations of the Code of Ethics investigated/accepted: 100%
G3 	Supply chain management (5.3)	Suppliers and contractors	Approving and implementing of the Supplier Code of Responsible Conduct; introduction of a familiarisation procedure Assessing risks of human rights violations with respect to suppliers Introducing an environmental control system for suppliers	Development of the Supplier Code, launch of its approval procedure by the governing bodies of Moscow Exchange Number of suppliers that underwent human rights risk assessment: 0 Number of suppliers that have undergone an environmental assessment: 0
G4 	Expanding partnerships for sustainable development (5.3)	Professional associations and ESG agencies	Joining the UN Global Compact Joining climate change initiatives	Postponement of joining international initiatives
Respect for human rights, equal opportunities and staff engagement				
R1 	Employee engagement and efficiency (6.3)	Employees	Conducting an employee satisfaction survey and identifying opportunities for growth Developing solutions based on the results of employee engagement assessments at company and unit level	Conduct of an employee engagement assessment Percentage of engaged employees: 86.2% Percentage of satisfied employees: 88.6%

OVERVIEW OF MOSCOW EXCHANGE GROUP'S REPORTING SUITE	2022 SUSTAINABILITY PERFORMANCE HIGHLIGHTS	SUSTAINABILITY DATA	SUSTAINABILITY APPROACHES AND PROCEDURES	APPENDICES
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UN SDGs and topic number	Objectives and impact rating	Stakeholders	Activities	Implemented in 2022
R2 	Learning and development (5.8)	Employees	Providing regular training for employees in line with business needs	Average number of training per year per employee: 11 hours Number of senior managers trained: 23 males / 0 females Number of functional managers trained: 20 males / 27 females Number of specialists: 11 males / 7 females
R3 	Diversity and equal opportunities (6.2)	Employees	Developing a gender equality programme Developing an inclusion programme (employees with disabilities)	Development of Moscow Exchange's Social Responsibility Memorandum (approved on 26 January 2023)
R4 	Health, safety and well-being of employees (7.2)	Employees	Implementing a programme to identify emotional health issues of employees and approaches to support Implementing a programme to maintain the physical health of employees (wellbeing, including measures to combat COVID-19) Developing a new occupational health and safety management system for subsequent certification (ISO 45001)	Occupational accidents and diseases: 0 Number of employees trained in occupational health and safety: 384 employees
Environmentally friendly and trusted market infrastructure				
E1 	Risk management (5.8)	Moscow Exchange shareholders	TCFD: Assessing the risks and opportunities associated with climate change Training for employees with a focus on anticipating likely events and threats Conducting external quality assessment of the risk management system	Adoption of a Climate Risk Management Policy, inclusion of climate risk in the risk map, updating risk and opportunity assessments Percentage of employees trained in predicting likely events and threats: 97%
E2 	Information security (8.6)	Market participants and their clients	Confirmation of compliance with ISO 27001, ISO 22301 Testing the Exchange's Business Continuity Plan (BCP)	Data leakage: 0 Conducting an ISO 27001, ISO 22301 audit (external or internal) Percentage of BCP testing activities, plan vs. fact: 100%

UN SDGs and topic number	Objectives and impact rating	Stakeholders	Activities	Implemented in 2022
E3 	Sustainable technological development (7.9)	Market participants and their clients Moscow Exchange shareholders	Maintaining business continuity and service quality of exchange services in the new environment of disrupted former supply chains Bringing the share of green energy to the maximum: covering NSD and data centres Conducting load testing of tender management systems	IT systems availability rate: 99.99% Increase in the share of purchased green electricity to 72% Number of load testing of the trading systems: 1
E4 	Eco-efficiency and low-carbon development (4.5)	Regulators and government authorities Employees Professional associations and ESG agencies	Updating environmental documentation within the framework of applicable environmental legislation Reducing water consumption intensity in office buildings through the purchase of equipment Reducing the intensity of waste generation in office buildings Increasing the percentage of waste transferred for treatment/recycling/reuse Doing renovation work in compliance with all environmental legislation	Development and submission for approval by the Supervisory Board of the Moscow Exchange Environmental Policy Reduction of electricity consumption by 37.85% Reduction of heat consumption by 9.85% Reduction of waste generation by 20.8% 21-fold increase in the amount of waste handed over for treatment 69.85% increase in the amount of waste handed over for neutralisation and recycling
E5 	Market access and customer outreach (5.1)	Clients of the personal finance platform Finuslugi Market participants and their clients	Expanding the product range Developing a platform for retail investors	Increase in the Customer Satisfaction Index (CSI) to 8.7 Number of registered individuals who use two or more Moscow Exchange markets: 3 million Number of new products on the personal finance platform Finuslugi: 1
Advanced practices of responsible investing				
A1 	Development of exchange-based sustainable financing (6.2)	Issuers Trading members	Improving the regulatory framework for the following types of securities: transition bonds, sustainability bonds Conducting activities to stimulate placements in the Sustainability Sector	Volume of new bond issues in the Sustainability Sector: RUB 106.2 billion Seven events for issuers on new types of securities in the Sustainability Sector
A2 	ESG indices and market data (6.2)	Professional associations and ESG agencies Trading members	Expanding and adapting the ESG indices in line with demand from market participants	Launch of one new ESG index (the index was launched on 1 March 2023)

UN SDGs and topic number	Objectives and impact rating	Stakeholders	Activities	Implemented in 2022
A3 	Growth and IIM sectors (5.8)	Issuers Trading members	Enhancing growth opportunities and access to financing for small and medium-sized enterprises (Growth Sector) Enhancing growth opportunities and access to financing for companies developing innovative products (IIM sector)	Volume of placements in the Growth Sector: RUB 5.6 billion Volume of securities issued in the Innovation and Investment Market: RUB 15.6 billion
A4 	Registry and trade in carbon units (5.9)	Issuers Trading members Regulators and government authorities Development institutions and international organisations	Launching the carbon register for NSD Organising and supporting carbon units trading on NAMEX	Launch of the carbon unit registry Launch of trading in quota implementation units
A5  	Communication of sustainability trends, standards and practices to issuers (6.3)	Issuers	Making regular publication of the current Issuer Guidelines on How to Comply with Best Sustainability Practices Conducting ESG events for issuers and other stakeholders Conducting a survey of issuers on sustainability awareness	Updating of the Best Practice Guide for Issuers Conduct of 15 ESG events by Moscow Exchange Conduct of a survey on issuers' awareness of sustainability issues
A6 	Improvement of Moscow Exchange's ESG disclosure and ESG ratings (6.3)	Moscow Exchange shareholders and investors Professional associations and ESG agencies	Preparing and disclosing a Sustainability Report with professional assurance Creating a single file (databook) for the collection and monitoring of quantitative ESG data Updating the website page on sustainable development Increasing ESG ratings by increasing disclosure and demonstrating progress	Issue of the 2021 Sustainability Report with professional assurance Development and posting on Russian and English websites of the ESG-databook containing quantitative indicators of Moscow Exchange activities Updating of the sustainability web-pages on MOEX's Russian- and English-language website Number of ESG rating upgrades and finding in ESG indices: 1
Trusted relations with local communities				
T1 	Financial literacy of retail investors (7.2)	Market participants and their clients Residents of the region of presence	Carrying out events to promote financial literacy (webinars) Partnering with universities and other organisations to promote financial literacy	Number of people who participated in financial literacy events organised by the Exchange: 500,000 Number of unique clients in the trading system: 22.9 million

UN SDGs and topic number	Objectives and impact rating	Stakeholders	Activities	Implemented in 2022
T2   	Charity, sponsorship (4.8)	Residents of the region of presence	Aligning charity policy with business priorities and strategy Establishing a charity data collection system for effective monitoring of spending and impact Incorporating biodiversity protection projects into charitable activities	Value of contributions towards charity: RUB 189 billion Planting of 40,000 trees

KEY NON-FINANCIAL PERFORMANCE INDICATORS

Each year, Moscow Exchange sets targets for key performance indicators (KPIs), which are approved by the Supervisory Board. The KPIs for 2022 included: developing new products and services.

As of year-end, all established KPIs have been achieved.

New products and services were offered to customers of Group companies, helping to make financial markets more accessible, including in the retail

segment. Twenty three (23) financial institutions offered deposits and four banks offered loans on the Finuslugi personal finance platform.

Carbon trading through commodity auctions was launched, providing transparent and open pricing for the new asset category.

Specific, quantifiable goals are set for the members of the Executive Board, as well as for all other employees of Moscow Exchange. Achievement of these goals impacts the compensation received by employees and management.

MEDIUM-TERM ACTION PLAN

Based on the Roadmap, Moscow Exchange has made the following plans in the field of sustainable development and ESG initiatives:

- continue to integrate ESG objectives into business processes;
- develop the competencies of employees and managers in ESG and sustainable development;

- develop new ESG products and services;
- continue to integrate climate risks into the risk management system;
- continue to improve the quality of non-financial disclosures.

MOSCOW EXCHANGE GROUP PROFILE

2-1

Moscow Exchange Group is the largest exchange in Russia, as well as Central and Eastern Europe, in terms of the trade volume of its main asset classes; it also has the largest stock market capitalisation. It plays a key role in the development of the Russian financial sector.

The Group provides a full cycle of trading and post-trading services on five markets (Equity, Bond, FX, Money, Commodities and Derivatives Markets) to individuals and legal entities, implementing the principle of full vertical integration of a trading operator with a clearing house acting as a central counterparty and central securities depository, creating a unique integrated platform together. Securities of companies from all sectors of the economy are represented on Moscow Exchange.

The traditional B2B business model is being transformed into a B2B2C model, where investors trade through licensed participants (broker banks) and have direct access to the financial marketplace, the Finuslugi platform.

2-1 2-6

The Group operates in Russia, and it has a single customer service centre located in Moscow.

Moscow Exchange Group includes Moscow Exchange MICEX-RTS PJSC (Public company), which operates the only multifunctional exchange platform in Russia for trading in equities, money market instruments, derivatives, foreign currencies, precious metals, and other assets. Moscow Exchange PJSC provides trading opportunities for equities, bonds, derivatives, currencies, money market instruments, and commodities.

In 2022, about 6,000 local and 1,000 global instruments, including ESG instruments, were traded on Moscow Exchange.

2-6

Scope of activities and operational indicators

RUB 1,055.89 trillion
total trading volume at all of the markets
(+4.6% compared to 2021)

RUB 83.95 billion
operating income
(+52% compared to 2021)

RUB 6.6 trillion
total assets
(+ 7.7% compared to 2021)

Share of Moscow Exchange Group on the local market against over-the-counter (OTC) market

65%
with respect to FX instruments

90%
with respect to bonds

86%
with respect to repo deals

67%
with respect to derivative financial instruments

89%
with respect to shares

CUSTOMERS AND MARKETS

2-6

In 2022, the Russian retail investors were most active on the Equity and Derivatives Markets, while Russian banks and brokerage organisations were most active on other markets.

In the reporting year, private investors' activity reached a historic high: more than 2 million people executed transactions each month. The share of private investors (Russian retail investors) in equity trading reached 59%; in bonds trading the corresponding figure was 18%, in the FX Market — 9%, and in the Derivatives Market — 59%.

During the reporting period, the public's attention to financial market instruments continued to grow. The number of individuals with brokerage accounts with Moscow Exchange increased by 6.1 million in 2022, reaching a record 22.9 million people.

The number of individual investment accounts – IIAs – increased by 449,000, amounting to about 5.2 million accounts.

22.9 million
individuals have brokerage accounts

+36%
on 2021

OVERVIEW OF
MOSCOW EXCHANGE
GROUP'S REPORTING SUITE

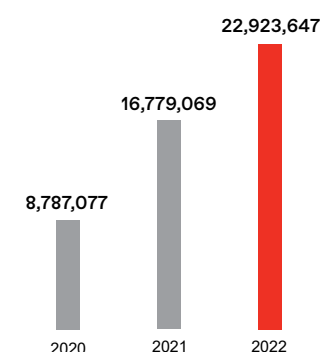
2022 SUSTAINABILITY
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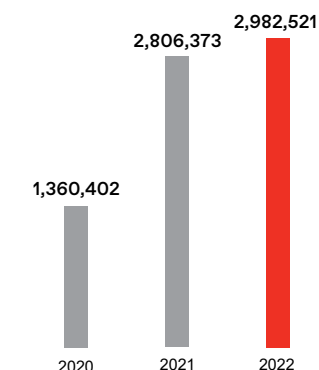
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Number of unique clients on the securities market as of the end of December each year (people)



Number of registered individuals who used two or more Moscow Exchange markets as of the end of each year (people)



TRADING VOLUME AND NUMBER OF TRANSACTIONS

2-6 FN-EX-000.B

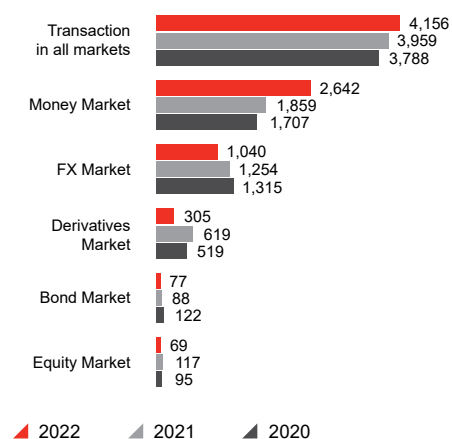
In 2022, the total trading volume on the Exchange's markets amounted to RUB 1 quadrillion 56 trillion (+4.6% compared to 2021).

The average daily trading volume (ADTV) on all markets in 2022 increased by 5.4% compared to 2021, amounting to RUB 4.2 trillion. The highest growth was in the Money Market (+42.3%).

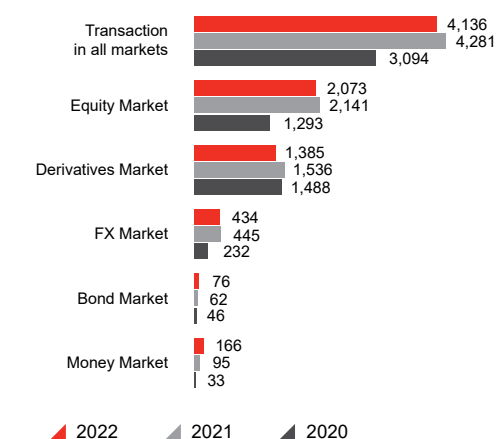
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The average daily number of transactions on all markets in 2022 was down by 3.4% to 4.1 million. However, the Money Market saw the 73.5% increase in the number of transactions.

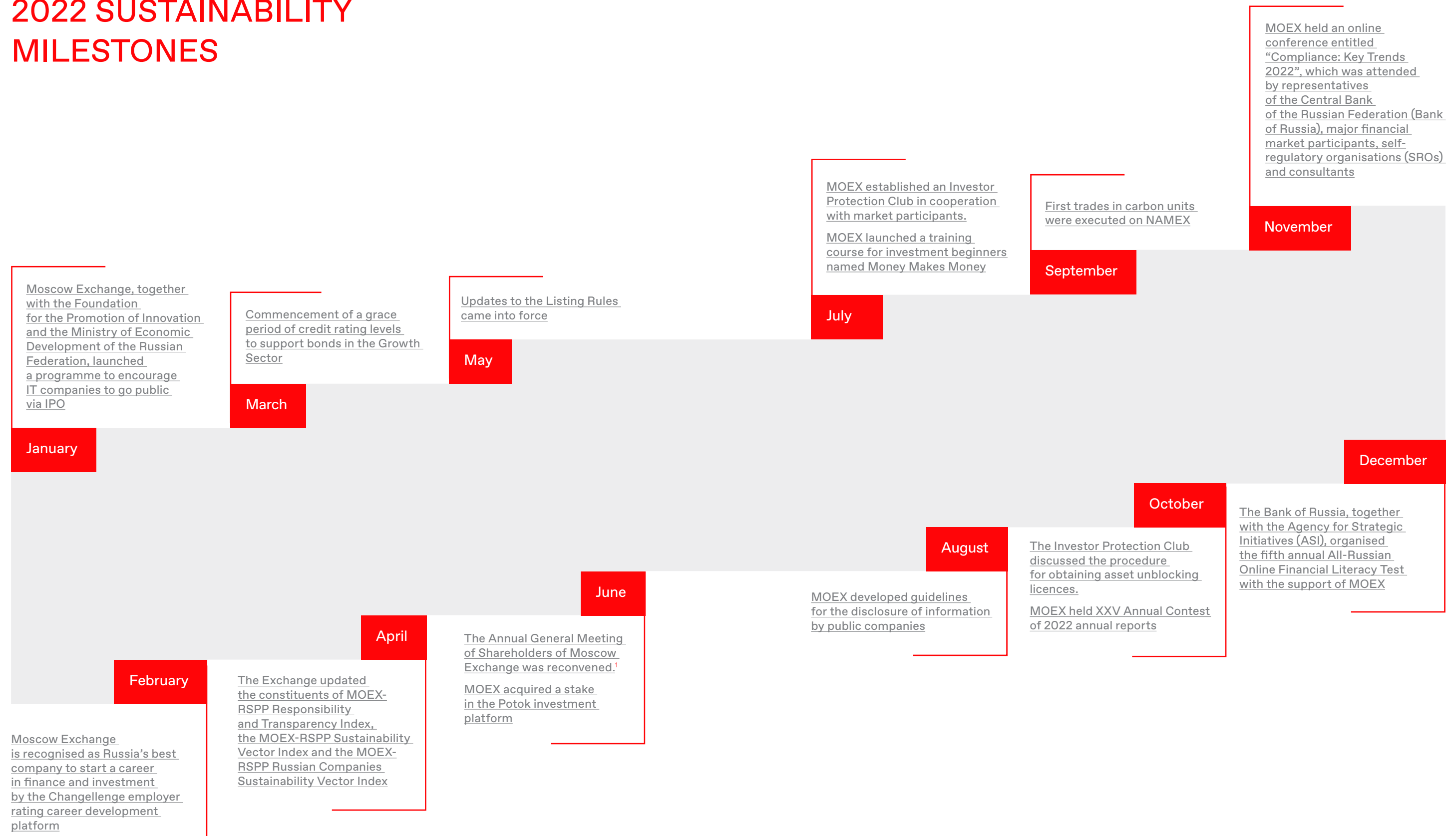
ADTV by market, including placements (RUB billion)



Daily average number of transactions (thousand)



2022 SUSTAINABILITY MILESTONES



¹ The first General Meeting of Shareholders did not take place due to lack of quorum.

CLIMATE AGENDA

For the 2020, 2021 and 2022 metrics, see the Resource Efficiency and Environment Impact subsection of the Sustainability Data section.

3-2

Every year, an increasing number of countries and companies strive to account for and reduce greenhouse gas (GHG) emissions, and their actions are becoming more focused. The participants of the 27th UN Climate Change Conference (COP-27) reached certain agreements, including on Article 6 of the Paris Agreement, which defines how international carbon markets should operate, as well as the development on other mechanisms and financial instruments that may subsequently lead to changes in the legislation of these countries setting the direction of financial flows for financial institutions and companies in response to global climate change.

GOVERNANCE

TCFD 3-3

The Group's general ESG strategy covers the management of climate risks and opportunities. Identifying and assessing climate risks and opportunities and integrating such processes into the activities of the Group companies are part of Moscow Exchange's Sustainability Roadmap. In implementing the roadmap, the Group companies and management bodies get a better understanding of the climate agenda and the tasks faced by the Group.

Moscow Exchange Group works to improve its business processes with due regard for climate risks and introduce new operating models. This approach facilitates the taking of more weighted strategic decisions in planning out the Group's activities.

Climate risks and opportunities management goals:

- build resilience to climate risks;
- take full advantage of climate change;

Moscow Exchange strives to mitigate climate change in three ways:

- through compliance with best global practices in accounting for and reducing greenhouse gas emissions;
- by developing carbon units trading;
- by encouraging the issuers and financial market participants to invest in the implementation of climate action initiatives through responsible investing mechanisms of the Sustainability Sector.

This section describes Moscow Exchange Group's approaches to climate risk management, as well as its activities and initiatives to reduce the greenhouse gas emissions from its operations in line with the recommendations of Task Force on Climate Related Financial Disclosures (TCFD).

- contribute to achieving the Paris Agreement objectives.

The Supervisory Board and the Risk Management Committee consider climate risks and opportunities, analysing the quality of their management and the effectiveness of the Group companies' activities. Members of the Supervisory Board participate in climate risk management by preparing instructions for the Group companies and ensuring that the climate agenda is included in the Group's medium-term and long-term strategy. Members of the Executive Board oversee the Group's climate risk management plans and actions.

Moscow Exchange is guided by the following key international documents:

- UN Framework Convention on Climate Change, and the Paris Agreement dated 12 December 2015;
- Recommendations of the TCFD.

STRATEGY AND SCENARIO ANALYSIS

TCFD 3-3

In 2020–2021, Moscow Exchange analysed the Group's exposure to climate risks, including those related to products and services provided. Moscow Exchange assessed its interactions with customers, partners, and suppliers in this context. To analyse possible options, quantitative and qualitative methods of risk assessment were employed, including scenario analysis. Moscow Exchange also identified new opportunities for the Group companies and financial market participants associated with the transition to a lower-carbon global economy.

The scenario analysis revealed:

- low-impact risks that emerged in the previous two years;
- medium- and high-impact risks that emerged over the previous 20 years.

The calculations used scenario terms of the Intergovernmental Panel on Climate Change (IPCC) and the International Energy Agency (RCP 2.6 and IEA 2DS), supplemented by Group-specific criteria.

For each climate risk scenario, Moscow Exchange develops measures to mitigate the adverse impact of its activities on the climate and increase the Group's ability to adapt to climate change, changes in the regulatory environment, and cater to the market's appetite for responsible investing.

Following the analysis, heat maps of risks and opportunities were prepared.

Moscow Exchange Group's strategic action plan for climate risk management includes the following key areas:

- enhancing the understanding of climate risks;
- regularly assessing climate risks (including physical and transition risks) and formulating actions to manage these risks in the short, medium, and long term;
- integrating climate risks into Moscow Exchange's risk map and embedding them into the general risk management processes;
- disclosing information about:
 - climate risk identification and assessment processes;
 - appropriateness of scenarios related to climate change;
 - key climate risks and, where applicable, their impact on financial performance; and
 - measures taken to adapt to climate change;
- collaborating with regulators, industry associations, and international financial institutions to share best practices for managing climate risks.

The Group believes that this approach is in line with its business strategy, as it will foster a more stable and effective financial system and the achievement of greenhouse gas emissions reduction targets.

RISK MANAGEMENT

TCFD 201-2

Moscow Exchange Group admits that climate change poses risks to business continuity that may have long-term economic, environmental, and social implications for many sectors of the global economy, society, and the Group companies.

As part of its risk management system, the Group regularly identifies and assesses business risks in terms of their likelihood and expected financial losses. Moscow Exchange continuously monitors the legal environment and introduces international best practices to identify and assess climate risks and incorporate climate-related disclosures in its reporting.

Under the business continuity management system, a list of climate risks is compiled and factored in to strategic and financial planning. Moscow Exchange regularly assesses the impact of climate risks on trade and investment portfolios.

Key processes of the climate risk management system:

- compilation of a list of risks and opportunities, categorised and prioritised;
- assessment of the likelihood and impact of the risks identified;
- scenario analysis of risks and opportunities;
- updating the heat map of risks;
- monitoring the implementation of risk mitigation measures.

In line with the TCFD's recommendations, Moscow Exchange distinguishes two main types of climate risks:

- physical: risks of extreme weather events, natural and man-made disasters;
- transition: risks associated with the transition to a lower-carbon economy.

Physical risks involve potentially significant damage to premises and infrastructure, and harm to employees of the Group, its customers and partners, disrupting their businesses and resulting in financial losses that may prove critical.

Transition risks are divided into policy and legal, technology, market, and reputation risks. Each type may have significant financial implications for the Group's business.

In 2022, the Exchange continued to improve its climate risk assessment model by estimating each risk probability and the expected losses. In order to do that all climate risk were divided into five types: market, policy and legal, reputational, physical, and technology, (see the table "MOEX Group climate-related risks for a detailed description of the types of risks) For all types of climate-related the degree of potential financial impact was determined and events (risks) of small and large magnitude were identified. In addition, two scenarios were used (significant and minor impact events) for financial assessment of risks and opportunities.

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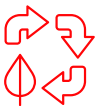
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Top scenarios for climate risks

RUB 207.7 million RUB 103.8 million High cost of switching to low-emission technology Medium-term outlook (1-5 years) 	RUB 112.1 million RUB 112.1 million Investments in inefficient technologies that do not result in significant reductions in greenhouse gas emissions Medium-term outlook (1-5 years)	RUB 41.5 million RUB 20.8 million Refocusing consumers and investors in favour of ESG companies Long-term outlook (5 years and longer) 
RUB 41.5 million RUB 20.8 million Falling energy demand and prices associated with the transition to renewable energy sources Long-term outlook (5 years and longer)	RUB 34.6 million RUB 17.3 million Forest fires 	

Top scenarios for climate opportunities

RUB 83.1 million RUB 62.3 million Incentives to increase market participation: tax breaks or regulatory incentives Medium-term outlook (1-5 years) 	RUB 65.2 million RUB 52.1 million Reducing emissions from employee commuting when working remotely Medium-term outlook (1-5 years) 	RUB 41.5 million RUB 20.8 million Developing and/or expanding services to issuers (with low emissions) Long-term outlook (5 years and longer) 
RUB 17.8 million RUB 5.9 million New renewable energy companies going public Long-term outlook (5 years and longer) 	RUB 12.5 million RUB 4.2 million Implementation of a Sustainable Supply Chain Policy Long-term outlook (5 years and longer) 	

xx Financial impact of a significant impact possibility / high impact event (RUB).

xx Financial impact of a significant impact possibility / high impact event (RUB).

The financial costs for addressing climate risks and achieving climate opportunities mainly consist of staff costs for the areas responsible for climate action to some extent. The exceptions are the costs of commissioning contracts for the purchase

of electricity from RES, not exceeding RUB 2 million, and the contribution to the share capital of Contour (RUB 66 million), which is responsible for the creation and maintenance of the carbon unit registry.

Integration of Moscow Exchange Group climate-related risks into the risk management system

Climate risks	Impact	Probability of small/large-magnitude risk	Response to risk or risk mitigation measures
Physical risks			
Acute risks			
Floods, snowfalls	Changes in precipitation and extreme variability in weather patterns, including floods with destruction of roads, bridges, power lines, buildings, and other infrastructure, resulting in loss of life or injuries and leading to business shutdown	Average/Low	Disaster recovery strategies include: reconfiguration of systems using hardware that remains stable, enabling restoration of communications after a critical failure;
Freezing rain	Power failures (ice-covered power lines become extremely heavy, causing line supports, insulators, and lines to break). Traffic delays due to icy roads. Potential loss of life or injuries	Average/Low	availability and configuration of hot backups to restore major infrastructure applications;
Hurricanes, storms	Destruction of power lines, residential buildings, and other infrastructure, with loss of life or injuries and leading to business shutdown. Traffic delays	High/Low	mirroring and cold backup of affected location and data recovery.
Forest fires	Destruction of property. Release of hazardous chemicals due to wildfires has a significant adverse impact on human health	Average/Average	Employee relocation plan will be rolled out in the event of forest fire emergencies
Chronic risks			
Ice-crusts on ground	Ice-crusts on ground can lead to injury employees and their incapacity	High/High	Employees who work in the office, will be recommended to stay at home
Extremely hot weather	Adverse impact on employee health and operability of equipment Lower productivity	Average/Average	Providing a comfortable workplace environment: workplaces in air-conditioned offices will be offered to employees working from home without air-conditioning
Extremely cold weather	Adverse impact on employee health and operability of equipment, resulting in slowdown or shutdown of operations	Above average / Average	Providing a comfortable workplace environment: employees working in the office will be permitted to stay at home. Employee relocation plan will be rolled out if extremely cold weather is followed by a central heating shutdown

Climate risks	Impact	Probability of small/large-magnitude risk	Response to risk or risk mitigation measures
Transition risks			
Policy and legal risks			
High power costs	Energy prices rising faster than inflation as a result of abrupt transition to zero-carbon power generation	Average/Average	Wider use of energy-efficient equipment
Enhanced emissions-reporting obligations	Additional financial and labour costs to collect information and report greenhouse gas emissions and their reduction	Average/Above average	Establishing carbon reporting procedures, participating in the CDP national and international carbon reporting initiatives. Engaging consultants for carbon reporting
Inaccurate or false emissions disclosures	Fines and reputational damage: this is a developing area with new rules and disclosure standards, such as the TCFD's Recommendations or the EU SFDR, including at the national level (Russia supports the implementation of new climate-related reporting rules along with requirements introduced this year)	Below average/ Below average	
Higher exposure of issuers to litigation.	Increased legal costs and expenses, including court-imposed fines	Below average/ Below average	
New requirements for greenhouse gas emissions disclosures hindering placement of securities	Additional costs for maintaining a dedicated database of greenhouse gas emissions and preparing reports. Additional equity placement requirements	Average/Low	
Lack of clear regulatory targets for carbon emissions	Multiple possible interpretations of laws and regulations. Increased risk of non-compliance	Below average/ Below average	Coordination with issuers of changes in listing requirements concerning the reporting in the field of greenhouse gases
Technology risks			
Costs of transition to lower-emissions technology	Failed investments in new technologies. Costs of setting up new business processes. Increased capital expenses for MOEX transitioning to low-carbon technologies.	Low/Low	Options for hedging financial risks associated with depreciation of assets

Climate risks	Impact	Probability of small/large-magnitude risk	Response to risk or risk mitigation measures
Power outages and emergencies due to low system resilience	Temporary power outages due to insufficient power storage capacity and lack of upgraded power grid services (resulting from a rapid and widespread transition to renewable energy sources). Power outages are expected to become more common at some point during the transition to lower-carbon technologies	Low/Low	Recovery strategies for a prolonged power outage at a single location include: - reconfiguration of systems using hardware that remains stable, enabling restoration if communications after a critical failure; - availability and configuration of hot backups to restore major infrastructure applications; - mirroring and cold backup of affected location and data recovery
Failed investments in new lower-carbon technologies	Purchase/investment in inefficient new equipment/technologies can necessitate repurchases / investments, taking into account the requirements reduction of emissions	Below average/ Below average	Options for hedging financial risks related to investment in high-risk lower-carbon technologies
Market risks			
Refocusing consumers and investors in favour of ESG companies	Shifts in consumer preferences. Reduced demand for services not meeting climate goals due to changes in investor behaviour	Low/Low	Introduction of ESG requirements for issuers and control over their implementation
Lower energy prices as a result of energy transition	Decrease in demand and prices for energy leads to a drop in the income of the exporters and the loss of their capitalisation, which leads to lower commission new income.	Low/Low	Options for hedging financial risks associated with depreciation of assets
Increased tax expenses of issuers (carbon taxes/ allowances)	Changes in the terms of carbon taxation, including increased tax rates, may lead to increased tax costs for issuers	Low/Low	
Increased power and heating prices due to transition to zero-carbon energy sources	Increased office maintenance costs	Below average/ Below average	Switching employees to remote working during winter

Climate risks	Impact	Probability of small/large-magnitude risk	Response to risk or risk mitigation measures
New regulations limiting greenhouse gas emissions	Increased costs due to the implementation of emissions purification technologies. Decreased production due to the introduction of emissions targets	Low/Low	Establishing carbon reporting procedures. Participating in national and international carbon reporting initiatives. Engaging consultants for carbon reporting
Share of green energy in the total power costs of companies is not regulated	Lack of a clear vision on the share of green energy may hinder the growth of the carbon market	Low/Low	Partnership development with issuers
Reputational risks			
Increased concerns or negative feedback of stakeholders regarding Moscow Exchange's ESG policy	Lower demand for services and negative impact on workforce management and planning (hiring and retention), resulting in revenue decrease	Low/Low	Establishing carbon reporting procedures. Participating in national and international carbon reporting initiatives. Engaging consultants for carbon reporting
Reduced revenue from decreased demand for services	Increased stakeholder concerns over issuers' compliance with emissions standards or negative stakeholder feedback. Reduced investor interest due to uncertain market signals	Below average/ Below average	
Lower investor interest	Reduction in capital availability for issuers	Low/Low	Selection of instruments for hedging financial risks associated with investing in high-risk low-carbon technologies

Climate-related opportunities of Moscow Exchange

Climate-related opportunities	Probability of small/large magnitude risk	Description of impact indicator
Developing and/or expanding the list of services to issuers (with low emissions)	Below average / below average	Providing additional incentives for issuers with low emissions, leading to an increase in trading turnover for these issuers and increasing income for Moscow Exchange
External incentives to use more efficient types of transport	Average / above average	Reducing the administrative costs of Moscow Exchange
Reducing emissions from employee commuting when working remotely	Above average / high	The development of working from home will mitigate physical climate risks, reduce indirect greenhouse gas emissions (Scope 3) by eliminating the need for employees to travel to work, and reduce the administrative costs of MOEX and by saving electricity and heat consumption to support employee activities in company offices
External incentives to reduce electricity and heat consumption	Above average / high	Reduced office maintenance costs

Climate-related opportunities	Probability of small/ large magnitude risk	Description of impact indicator
Implementation of a Sustainable Supply Chain Policy	Below average / average	Incentives for low-emission companies will reduce operating costs and increase profits/capitalisation, which will have a positive impact on trading volume
Incentives to increase market participation, such as tax breaks or regulatory incentives	Below average / average	
Development of new services such as climate-related indices, education and training for the market	Above average / high	Creation of services such as the new indices will help to increase revenues from the sale of market data
The development of the market for carbon units	Above average / above average	Developing the carbon market will create a new business segment that can generate revenues on a par with other segments
Recognising the contribution of MOEX to climate protection by society	Below average / below average	Recognising MOEX's contribution to climate protection will increase trust in the company and attract additional customers
New renewable energy companies going public	Below average / average	Creation and development of new industries will increase company revenues through economic growth in the Russian Federation
ESG consulting	Below average / average	Elaboration of a climate agenda / training / advice for market participants

METRICS AND TARGETS

TCFD

Currently, Moscow Exchange is developing greenhouse gas emissions targets and metrics to assess its progress against the targets.

PLANS FOR 2023

In 2023, Moscow Exchange will continue integrating climate risks into the company's unified risk management system to accomplish the following objectives:

- introduce new risk management tools, including with scenario analysis functionality;
- continuously monitor climate risks and their characteristics;

- train employees with a focus on predicting likely events and threats;
- ensure business continuity and agility of the Group.

The Group is committed to accomplishing these objectives despite the potential impact of the global geopolitical situation on their timing.

MOEX GROUP'S FOCUS AREAS: 'GREAT'

G | GENUINE CORPORATE GOVERNANCE AND BUSINESS ETHICS

41.7%

of the members
of the Supervisory Board
are independent directors

50%

of the members of the Audit
Committee and the Nomination
and Remuneration Committee
are independent directors

8.3%

of the members
of the Supervisory Board
are women

Moscow Exchange Group adheres to best practices and standards in corporate governance, ethics, and business conduct. The Group is also developing a system for internal control and risk management. Sustainability principles are reflected in the activities of the Group's corporate governance bodies. The scope of issues considered at Supervisory Board meetings is expanding. Moscow Exchange continues to develop policies to regulate the management of sustainability-related issues, implementing best practices in business conduct among the Group's companies, in the supply chain, and also among issuing companies and other financial market participants.

Moscow Exchange Group's objectives and the UN Sustainable Development Goals:

- SDG 5.5 Ensure gender balance at the Group
- SDG 5.5 Promote gender equality in the business environment
- SDG 12.6, 13.3 Raise companies' awareness of sustainability-related trends, standards, and practices
- SDG 4.7 Ensure the Group's personnel have the competencies they need to manage sustainability issues effectively

Composition of shareholders and the structure of Moscow Exchange's authorised capital as of 31 December 2022

Shareholder	31 December 2022	
	Voting power (voices)	Voting power (%)
Central Bank of the Russian Federation	268,151,437	11.780
Sberbank of Russia	227,682,160	10.002
VEB.RF	191,299,389	8.404
EBRD	120,472,902	5.292
State Street Bank & Trust Company	119,663,685	5.257
MICEX-Finance	18,829,079	0.827
Free float (excl. MICEX-Finance; incl. State Street Bank & Trust Company)	1,449,966,491	63.696

2022 highlights

This subsection describes the Moscow Exchange Group efforts in developing the compliance system, projects aimed at combating corruption and increasing adherence to ethical principles of business conduct, as well as at further improving the quality of corporate governance in the companies of the Group.

Figures for 2019, 2020, 2021 and 2022 are available in the Genuine corporate governance and business ethics subsection of the Key Sustainability Data section. See the Genuine corporate governance and business ethics subsection of the Sustainability Approaches and Procedures section for information on key policies, procedures, and responsible departments.

Corporate governance

2-9

The corporate governance structure of Moscow Exchange consists of the General Shareholders Meeting, the Supervisory Board, the Executive Board, and Chairman of the Executive Board, who is Chief Executive Officer.

General Shareholders Meeting

Moscow Exchange's share capital structure is notable for:

- the absence of a controlling shareholder or shareholders with a stake exceeding 12%;
- high share of free float (64%).

Moscow Exchange strives to balance its shareholders' interests; it performs its infrastructural function on the financial market effectively.

According to the Charter of Moscow Exchange, each share entitles the holder to one vote at the General Shareholders Meeting. See the 2022 Annual Report of Moscow Exchange and [the official website](#) for more details on the decisions made at general shareholders meetings.

Supervisory Board

In order to comply with the corporate governance requirements established by the Listing Rules, as well as to ensure the fullest compliance with the Corporate Governance Code of the Central Bank of the Russian Federation, the following measures were taken in 2022:

2-9 2-10 2-11 2-17

- 11 non-executive directors were elected to the 12-member Supervisory Board, including five independent directors;
- all independent directors meet the independence criteria set by the Listing Rules;
- the Audit Committee and the Nomination and Remuneration Committee consist of independent members of the Supervisory Board;
- a non-executive director was appointed as Chairman of the Supervisory Board;
- in accordance with clause 12.2 of the Charter of Moscow Exchange, the members of the Supervisory Board are elected by the General Meeting of Shareholders for a term until the next Annual General Meeting of Shareholders and may be re-elected an unlimited number of times;
- the proportion of women on the Supervisory Board is 8.3%;
- the principle of forming the Supervisory Board and the Executive Board is based on the professional competences of the members of the Supervisory Board or the Executive Board, respectively;
- the Exchange seeks to ensure that different age groups are represented on the governing bodies; to date, these include those aged 40+, 50+, 60+ and 70+;
- the Supervisory Board brings together professionals with diverse profiles (entrepreneurial, functional, country-specific) and international competencies (in the area of the exchange industry, digital products and finance), which enables the Supervisory Board to address issues comprehensively and engage in meaningful discussions from different perspectives. Two members of the Supervisory Board hold positions in higher education institutions and are representatives of the academic and student communities.

The Supervisory Board includes representatives of the following stakeholders of the Moscow Exchange Group:

- Regulators and authorities
- Shareholders and Investors of Moscow Exchange
- Market participants and their clients
- Issuers
- Employees

Length of service and number of positions held by members of the Supervisory Board of Moscow Exchange

Members of the Supervisory Board	Total length of service (years)	Number of other positions (other than with Moscow Exchange)
Director 1	14	2
Director 2	13	0
Director 3	8	3
Director 4	1	1
Director 5	1	0
Director 6	1	0
Director 7	1	1
Director 8	3	0
Director 9	1	1
Director 10	1	1
Director 11	1	0
Director 12	3	5

In 2022, two strategy sessions were held to dive into the specifics of the Moscow Exchange Group's business, discussing various aspects of Moscow Exchange's business development, including areas such as technology development, the Sustainability Sector, the carbon unit market and risk management.

Further work on these issues is planned in the Group companies.

2-16

The Supervisory Board keeps abreast of critical issues through a specialised system for supporting the governing bodies' activities. Once information on critical issues is received, all Supervisory Board members are sent a special notification. In the reporting year there were no critical issues that would require the involvement of members of the Supervisory Board.

In 2022, the following committees operated under the Supervisory Board, carrying out preliminary consideration of issues and preparing decision-making recommendations:

- Strategic Planning Committee;
- Audit Committee;
- Nomination and Remuneration Committee;
- Risk Management Committee;
- Technical Policy Committee;
- Corporate Governance Committee.

The Supervisory Board's decision to form a new Corporate Governance Committee was taken at the end of December 2022, and as a result, no meetings of the Committee were held during the year.

2-9 2-12 2-13 2-15

Committees under the Supervisory Board

Committee	Key tasks	Number of meetings
Strategic Planning Committee	Improving the efficiency of Moscow Exchange and its subsidiaries through preliminary consideration and preparation of suggestions for the Supervisory Board on the preparation, development, and implementation of long- and medium-term strategic plans and objectives for Moscow Exchange	3
Audit Committee	Ensuring the effective work of the Moscow Exchange Supervisory Board in resolving issues related to control over financial and economic activities (including audit independence), verifying the absence of conflicts of interest, and evaluating the findings of audits of Moscow Exchange's financial statements	11
Nomination and Remuneration Committee	Ensuring the effective work of the Supervisory Board in resolving issues related to the activities of Moscow Exchange and of companies under the direct or indirect control of Moscow Exchange with regard to nomination and remuneration of the members of supervisory boards and governing bodies, as well as of other key executives and members of audit committees	13
Risk Management Committee	Participating in the improvement of the risk management system of Moscow Exchange and the Group in order to improve the reliability and efficiency of Moscow Exchange's operations	10
Technical Policy Committee	Developing and improving the efficiency of Moscow Exchange and the Group by preparing recommendations and expert opinions covering technical policy and the development of IT and software for the Supervisory Board, the boards of directors (supervisory boards) of the Group's companies and their committees, and for the governing bodies of Moscow Exchange and the Group's companies	6
Corporate Governance Committee	Preparing and negotiating with NSD's minority shareholders a draft new version of the Shareholders Agreement, making recommendations to the Supervisory Board of NSD for making the necessary corporate approvals in relation to the Shareholders Agreement, and developing and submitting recommendations to the Supervisory Board of Moscow Exchange and the Supervisory Boards of Moscow Exchange Group companies on corporate governance quality improvement issues, as well as on issues aimed at resolving disputes arising between Moscow Exchange Group companies in the process of coordinating corporate governance matters	0

2-24

The Supervisory Board approves risk appetite and risk management policies (including by topic), reviews reports on the risk management system, and decides on corrective measures based on those reports.

The Supervisory Board has a Risk Management Committee that also involves other companies of the Group in its activities.

2-19 2-20

Each Supervisory Board member is paid a fixed amount, depending on :

- the Supervisory Board member's status (compliance with the independence criteria);

- additional functions performed (as chairman or deputy chairman of the Supervisory Board);
- contribution to the work of the committees under the Supervisory Board (as committee chairman or member);
- attendance at meetings.

Remuneration of Supervisory Board members in 2022

Indicator	Amount (RUB thousand)
Remuneration for work in the governing body	185,324.02
Salary/wage	0.00
Bonus	0.00
Commission fees	0.00
Expense reimbursement	0.00
Other types of remuneration	290.28
Total	185,614.30

Evaluation of the effectiveness of the Supervisory Board and its committees

2-18

Prerequisites and grounds for the evaluation

In accordance with the recommendations of the Corporate Governance Code and international best practices, Moscow Exchange annually evaluates the effectiveness of the Supervisory Board. Pursuant to internal regulations, the Nomination and Remuneration Committee of the Supervisory Board engages external consultants regularly (once every three years) to conduct an independent evaluation.

In 2022, the external evaluation was conducted by Ward Howell, an independent consultant selected by the Supervisory Board after reviewing applications. In addition to the cost of services, the selection criteria included: the consultant's experience in implementing similar projects, academic and practical expertise in corporate governance, and the experience and level of professionalism of the project team. In addition, Ward Howell had already conducted an external evaluation by the Supervisory Board of Moscow Exchange in 2019, which ensured the continuity of the evaluation methodology.

Evaluation objectives and purposes

The objectives of the evaluation are to monitor the dynamics of changes in the work of the Supervisory Board and the commissions and to identify areas for improving the effectiveness of the Supervisory Board and its individual members. In addition, a particular focus of the 2022 evaluation was the vision of the Group's corporate governance model.

In order to achieve these objectives, the following tasks were carried out:

- the role and functions of the Supervisory Board and committees in the corporate governance system of the Company were assessed;

- the composition of the Supervisory Board and committees in terms of its balance and the effectiveness of the formation process was analysed;
- the priorities of the Supervisory Board and committees were identified;
- the effectiveness of the Supervisory Board and Committees' processes and procedures was evaluated;
- the effectiveness of interaction between Moscow Exchange and its subsidiaries was evaluated;
- the dynamics of the Supervisory Board and Committees meetings was reviewed;
- the contribution and effectiveness of the chairman of the Supervisory Board, the chairmen of the committees and the corporate secretary were evaluated;
- an individual assessment of the level of involvement and preparation for Supervisory Board meetings was carried out;
- recommendations were made to improve the work of the Supervisory Board and its collegiate bodies, form optimal composition, plan succession and carry out training and development activities.

Evaluation methodology

The consultants used several tools to gather the necessary information and obtain the most objective results:

- analysis of internal documents;
- analysis of video recordings of meetings of the Supervisory Board and committees;
- questionnaire survey of Supervisory Board members and management representatives;
- interviews with members of the Supervisory Board, Exchange management and representatives of the Supervisory Board and management of NCC;
- an individual 360-degree evaluation of the members of the Supervisory Board.

Members of the Supervisory Boards and management representatives of Moscow Exchange and NCC actively participated in the evaluation. The main

evaluation tool, the structured interview, covered 32 people (94% of the envisaged evaluation participants). The external consultant notes the high quality of the feedback and the openness of the participants during the interviews. For members of the Supervisory Board and the management of Moscow Exchange, participation in the survey was also envisaged - more than half of all management representatives of the Exchange and half of all directors of the board were included in the survey. The participation of NCC was only foreseen during the interview phase (100% of participants were interviewed). Involving participants from different groups allowed the widest and most objective assessment to be obtained.

Evaluation results

Based on the results of the 2022 evaluation, the Supervisory Board has significantly improved its performance in some aspects of its work that were highlighted as areas for development in the previous external evaluation in 2019, namely the quality of the Supervisory Board’s interaction with management; the quality of interaction with the regulator, the Bank of Russia; strengthening competencies in IT, digital product development and operational risk; reducing agenda overload and reducing the number of formal issues.

Among the strengths of the Supervisory Board, the following aspects particularly stood out:

- effective dialogue between the Supervisory Board and management: clear separation of powers, minimal interference by the Supervisory Board in operational management, increased trust, increased management autonomy, mutual support and a high speed of interaction;
- professional and diverse composition¹: the Supervisory Board brings together professionals with diverse profiles (entrepreneurial, functional, country-specific) and international competencies (in the area of the exchange industry, digital products and finance), which enables the Supervisory Board to address issues comprehensively and engage in meaningful discussions from different perspectives. There is also gender and age diversity on the Supervisory Board;

- leadership style of the Chairman of the Supervisory Board: the Chairman is deeply involved in the work of the Supervisory Board, supports directors and management, effectively manages relations with key stakeholders, and represents the company externally;
- Corporate Secretary and support for the Corporate Governance Department: the Corporate Secretary promptly implements best corporate governance practices and ensures the effective operation and support of the Supervisory Board.

Remuneration of executives at Moscow Exchange

2-19

The main elements of remuneration paid to the members of the Executive Board in 2022 are:

- a fixed component (salary);
- a variable component, including a short-term element (annual bonus) and a long-term element (remuneration under the Long-Term Incentive Programme Based on Shares).

The short-term variable component depends on whether the approved KPIs have been met, including general corporate and individual indicators. In contrast to 2021 with the ratio of 50/50, in 2022 it was decided that for all members of the executive bodies, corporate goals are to become equal to individual, meaning that corporate goals are to form 100% of indicators. For the Chairman of the Executive Board of the Exchange, this practice has been applied since 2020.

In order to increase the responsibility of executives, the Long-Term Incentive Programme was launched, granting them the right to receive shares in stages.

Remuneration and compensation paid to the members of the Executive Board in 2022

Type of payment	Amount of payment (RUB thousand)
Remuneration payable separately for participation in the governing body’s activities	0.00
Salary	132,646.16
Bonuses	228,571.89
Commission fees	0.00
Other types of remuneration	130.70
Total	361,348.76

2-21

Due to existing market practices and high sanctions risks, it was decided not to disclose information about the remuneration of the most senior official of Moscow Exchange Group and the ratio of his remuneration to the median remuneration of the Group’s employees.

Reliability of information on issuers

Moscow Exchange’s stance is consistent with international practice regarding the public disclosure of information by listed companies; financial, production, and ESG data; and changes that may affect share prices.

See the “Advanced practices of Responsible investing” subsection for details on requirements for issuers to disclose information that could affect the value of shares.

3-3

In 2022, Moscow Exchange updated its Listing Rules, which define the conditions and procedures for placement on the financial platform, the rules for delisting various types of securities, and other important details. According to this document, the inclusion of securities on the quotation list is subject to the following requirements:

- compliance of the securities with the current legislation of the Russian Federation, including regulatory acts of the Bank of Russia;
- assumption by the issuer of the obligation to disclose information in accordance with the requirements of the Law on the Securities Market and other legal acts of the Russian Federation, including regulations of the Bank of Russia.

Moscow Exchange conducts a review of securities for which applications have been submitted, checking issuers’ compliance against Moscow Exchange’s listing requirements. When preparing an expert opinion, the Listing Department considers official documents received by Moscow Exchange, information disclosed or submitted by the issuer, and messages posted on the websites of competent (regulatory) government authorities and organisations (self-regulated organisations, settlement depository, ratings agencies, organisations specialising in expert review of environmental and social projects, etc.). It may also consider information from the media and other sources.

Moscow Exchange monitors the compliance of market participants’ activities with the listing requirements. Should a violation of these requirements be detected, Moscow Exchange reserves the right to set a deadline to rectify it or to delist the securities.

The NCC is guided by the Rules of Clearing on the stock market, the deposit market, and the loan market.

In 2021, the Bank of Russia published an information letter containing recommendations on disclosure by public joint-stock companies of non-financial information about their activities: companies are recommended to voluntarily disclose information on sustainability and ESG factors — including corporate governance, — as well as environmental and social performance. Moscow Exchange supports the initiatives of the Bank of Russia.

¹ The evaluation considered the composition of the Supervisory Board, which functioned until February 2022.

Compliance system

Compliance is a crucial aspect of good corporate governance. The Group has built a compliance management system with developed business processes, procedures, corporate policies, and local regulations; risk assessments are carried out regularly (at least once a year) in all compliance areas.

Developing a corporate compliance culture, developing a unified approach to compliance risk management, as well as quality support for business processes in the face of a significant number of new regulatory requirements became one of the main areas of focus for corporate governance in 2022.

In 2022, Moscow Exchange successfully passed an independent audit and receive a certificate confirming compliance of its corporate compliance system with ISO 37301:2021 Compliance Management System. The audit covered the following areas:

- anti-corruption;
- countering the legalisation (laundering) of the proceeds of crime and the financing of terrorism;
- countering the misuse of inside information and market;
- manipulation;
- settlement of conflicts of interest;
- exerting internal control over organised trading and activities as a financial platform operator;
- monitoring compliance with the tax legislation, including international legislation (CRS, FATCA), and with economic restrictions.

In 2022, the Exchange successfully completed an operational audit in accordance with International Standard on Assurance Engagements 3402 (ISAE 3402), which resulted in a SOC 1 Type 1 report expressing an independent auditor's opinion on the effectiveness of the design and implementation of control procedures for the following processes:

- admission of financial platform clients;
- admission of trading members;
- listing.

The compliance activities of Moscow Exchange Group are organised into two areas – internal and external:

- internal compliance involves ensuring that the activities of the Group's companies comply with mandatory and voluntary requirements;
- the external compliance includes areas related to: 1) formalisation of requirements for issuers and bidders in the field of compliance; 2) informing market participants about best practices; 3) creation of compliance products for market participants.

“Compliance: Key Trends 2022” conference was held for market participants in 2022. The event looked at trends and modern compliance technologies to improve the quality of regulatory risk management.

Group's compliance practices

2-15 2-16 2-26

In accordance with the “Three Lines of Defence” model, the Supervisory Board of Moscow Exchange approves the Code of Professional Ethics, reviews reports, and assists in developing the ethics function. The managing director for compliance and business ethics is responsible for ethics and compliance-related issues; he/she is directly subordinate to the chairman of the Executive Board of Moscow Exchange.

The leader of the compliance function may take part in meetings of Moscow Exchange's management bodies and committees, in risk assessments of new processes and products, and in procurement procedures.

A self-assessment of Moscow Exchange's compliance system is carried out twice a year; external audits are carried out as part of the annual audit.

Failure by employees to comply with the Code of Professional Ethics and to complete mandatory compliance training affects the results of their annual evaluation.

The Group adheres to the open-door principle: employees are always welcome to ask for clarification, submit questions, or use the compliance portal. Moscow Exchange has developed an initiative to designate active employees (Compliance Ambassadors) who are interested in self-development and refinement of the Company's compliance procedures. They attend training sessions on topics related to compliance culture, and their initiatives in the field of compliance and ethical behaviour are reviewed and may be accepted.

The Group has designed technological solutions, including a communications channel (the anonymous SpeakUp! hotline — Moscow Exchange own creation) that can be used to report possible instances of corruption or violations of ethical business conduct and law. The latest survey held among the employees of the Moscow Exchange Group shows that 83% of employees are aware of the availability and functionality of the SpeakUp! hotline. All employees are welcome to submit anonymous reports via the hotline and receive a response (applicants are sent a link to a web page where they can check the reaction of the Group's companies). Moscow Exchange Group adheres to the principle of non-retaliation against employees who report problems.

In addition to the internal channel for employees, the Group has set up an external one for reports of corruption-related issues. Interested parties are welcome to use the [hotline](#) on the Moscow Exchange website.

Data on the number of applications received regularly reflected in the Sustainability Report. In 2022, 37 reports were received, including eight on possible professional ethics violations. There were no reports of corruption. All reports regarding potential compliance violations are investigated, and corrective action is taken whenever necessary.

The rest of the reports were general in nature and contained information about new and possibly unfair practices on financial markets, as well as suggestions for improving processes at companies of the Group. All appeals were processed by the Internal Control and Compliance Department; replies were sent within five business days.

Significant fines and breaches of the law

206-1 205-3 3-27

In 2022, there were no significant fines or cases of violation of legislation.

Non-significant violations include one order of the Bank of Russia related to a breach of reporting disclosure rules for 2022, as well as one warning of the Bank of Russia related to identified violations of the Moscow Exchange Trading Rules for the Derivatives Market in conducting the Coloured Prospects competition.

In 2022, no lawsuits (pending or completed during the reporting period) regarding anti-competitive behaviour or violation of antitrust legislation were filed against any companies of Moscow Exchange Group. There have been no confirmed cases of business ethics violations or corruption-related violations over the past three years.

Business ethics and anti-corruption

Corporate ethics and anti-corruption measures are important elements of the compliance system, and they are included in Moscow Exchange's Compliance Programme. These measures are constantly being improved in order to enhance the efficiency of operational processes, including by preparing reliable reporting, ensuring compliance with applicable laws, and developing a culture of trust in relations with employees and counterparties.

The Group adheres to the principles of staff involvement in achieving zero tolerance of corruption, avoiding conflicts of interest, and ensuring that actions and procedures are proportional to the level of risks identified during periodic risk assessments.

205-2

As part of implementing the zero-tolerance principle, Moscow Exchange Group takes corruption prevention measures aimed at both internal and external stakeholders, including informing and training employees, developing mechanisms for receiving information on corruption risk events, and including anti-corruption clauses in contracts with counterparties.

The percentage of employees who successfully completed anti-corruption training by the end of 2022 was 99.6%.

In 2022, all members of the Supervisory Board were familiarised with the Policy aimed at preventing corruption offences and the Moscow Exchange Code of Ethics.

The Anti-corruption Policy is publicly available; all partners and counterparties are informed of the Group's stance and the availability of the corruption hotline. All counterparties undergo mandatory checks. Compliance experts are involved in negotiating contracts that may entail corruption risks, including at the procurement stage, as well as in sponsorship and charitable activities.

205-1 205-3

The companies of the Group monitor the effectiveness of and control over anti-corruption procedures. Self-assessments of the quality of corruption risk management are carried out regularly; reports are compiled for the Executive Board and the Audit Committee under the Supervisory Board of Moscow Exchange. Corruption risk assessments are conducted at all 100% of the Group's companies. In 2022, no incidents of corruption or violations of the Code of Professional Ethics were registered. No significant corruption risks were identified, either.

Interaction with suppliers

414-1

The Group's companies have transparent conditions for suppliers and contractors who wish to participate in the procurement process through bids and transactions. Guided by internal regulations such as the regulations on procurement, the Group's companies guarantee the fulfilment of their contractual obligations.

In 2022, management continued to develop the Supplier/Counterparty Code of Business Conduct for the companies of Moscow Exchange Group in order to improve the business environment and reduce risks in the supply chain. It sets out principles of responsible business conduct which

Moscow Exchange expects counterparties to comply with and which are to be taken into account during procurements. The code is to be adopted in 2023.

In 2022, contracts worth

RUB 3.6 billion

were concluded for the supply of products and services.

Plans for 2023

The following corporate governance tasks have been set for 2023:

- to conduct assessment of the Supervisory Board's effectiveness;
- to determine a pool of successors for the members of the Supervisory Board;
- to formalise the Group's management system.

To expand the scope of work and assist employees in the area of compliance, the Group's companies have set the following objectives:

- to implement initiatives in accordance with the Compliance Roadmap;
- to take measures to develop risk and compliance culture.

To implement ESG principles throughout the supply chain, Moscow Exchange Group is planning to take the following actions:

- to approve the Supplier Code of Business Conduct and introduce a procedure for signing a document (or a form) confirming that counterparties are familiar with Moscow Exchange's requirements;
- to continue improving the planning, consolidation, and automation of procurement procedures for Moscow Exchange Group.

The Group's plans for 2023 and the coming years in the areas of internal audit, business ethics, and anti-corruption include continuous work on the Compliance Roadmap, which envisages improving procedures and automating compliance-related risk management processes.

R | RESPECT FOR HUMAN RIGHTS, EQUAL OPPORTUNITIES AND STAFF ENGAGEMENT

2-23

2,236 people

the Group's headcount as of the end of 2022 (+2% compared to 31.12.2021)

44%

share of women in the Group's headcount (43% as of 31.12.2021)

16%

staff turnover in 2022 (18% in 2021)

Building a comfortable, fair, and encouraging work environment is an overriding priority of Moscow Exchange Group. Over the past several years, Moscow Exchange has put considerable efforts into building a culture of respect and trust in the workplace and increasing employee satisfaction and engagement. Today, the Group continues to take part in dynamic activities to that end.

Care for our employees has been a key focus area of Moscow Exchange throughout 2022, which is reflected in the Sustainability Roadmap. Priority areas include pursuing gender equality, encouraging a healthy work-life balance, increasing the flexibility of the working environment, and ensuring the physical and emotional well-being of staff. The Group's management seeks new approaches to developing expertise, managing the agenda, and setting ambitious and quantifiable objectives.

Moscow Exchange Group's objectives and the UN Sustainable Development Goals:

- SDG 4.4 Develop employees' professional and technical skills
- SDG 4.7 Train employees to effectively manage sustainability within the Group
- SDG 5.5 Ensure gender equality in the Group
- SDG 8.5, 8.6, 8.7, 8.8 Ensure decent working conditions for employees

2022 Highlights

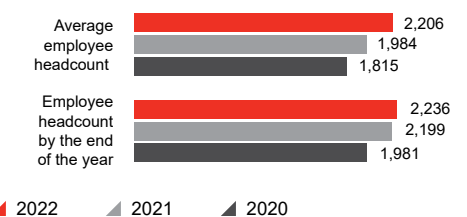
This subsection provides a description of the activities and initiatives of the Moscow Exchange Group to create decent working conditions, a safe and comfortable workplace environment, and the basic principles that ensure a culture of development and equal opportunities.

Particular attention is paid to the Group's efforts to train and develop employees, including raising employee awareness of sustainability issues.

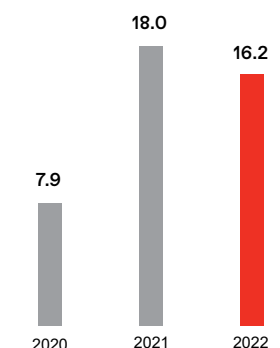
For 2020, 2021, and 2022 metrics, see the Respect for Human Rights, Equal Opportunities and Staff Engagement subsection of the Sustainability Data section. For key policies, procedures, and departments, see the relevant subsection of the Sustainability Approaches and Procedures section.

2-7

Total employee headcount at Moscow Exchange Group (people)

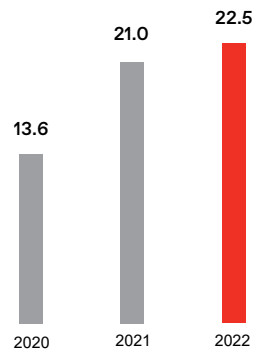


Employee turnover (%)



401-1

Employee Dismissals Rate (%)



In 2022, Moscow Exchange Group was implementing a project to introduce an electronic document management (EDMS) for human resources. The project is scheduled to be completed in 2023.

In 2022, a project was also implemented to optimise the Group's business processes by establishing Competence Centres for supporting functions.

Staff engagement and performance

The total employee headcount of the Moscow Exchange Group increased by 1.6% in 2022. The staff turnover rate was 16.2%, a decrease of 1.8 p.p. compared to 2021. The rate remains relatively high due to external events in 2022, while being significantly lower than the average turnover rate for the financial sector in Moscow (based on data for 2020–2021). There have been no job cuts within the Group over the past three years.

By analysing the reasons for employee resignations, the Group takes measures to reduce turnover on this basis. To this end, employee engagement is monitored. In 2020, the Supervisory Board of the Exchange approved a new long-term incentive programme for 2020–2023 to retain key personnel and ensure their focus on the long-term business development of the entire Group. The Group is also implementing a long-term incentive programme for key personnel based on phantom shares.

Every year, the Group conducts a comprehensive study of employee engagement. In 2022, 84% of the staff took part (Moscow Exchange – 82%, NCC – 92%, NSD – 84%) Polling yielded the following results:

- engagement – 86.2%;
- loyalty – 84.4%;
- satisfaction – 79.1%.

Key areas of development were identified through the survey. In order to create a plan to enhance the efficiency of operations, the Group organised focus groups, identifying critical areas for employees, such as HR issues, career planning, training, remuneration, and work-life balance. Relevant activities and discussions were subsequently arranged.

Learning and development

The employees of have access to an extensive library of training materials.

404-2

Moscow Exchange's training and development system includes educational programmes, workplace development tools and self-study. However, the choice of a particular type of training is left to the employees themselves. To meet their development needs, they can use modern technology, corporate resources and other opportunities such as cross-functional internships, mentoring, wikis (websites), and an e-library.

In 2022, the main focus of training was to maintain business continuity and to substitute import. In 2022, 24% of employees participated in various educational programmes and sessions.

IT communities in the Group were further developed: 22 IT communities were functioning in 2022, and six meetups on professional community topics were organised, with more than 300 employees taking part therein.

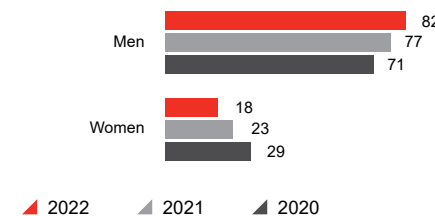
Beginning 2020, onboarding training for new employees takes place in an online format. The training includes topics that allow the newcomer to quickly get up to speed. The newcomer course includes webinars on the operations of all Group companies, HR processes, compliance, information security, and corporate life. In 2022, all new hires remarked on the high quality of the onboarding process.

Diversity and equal opportunity

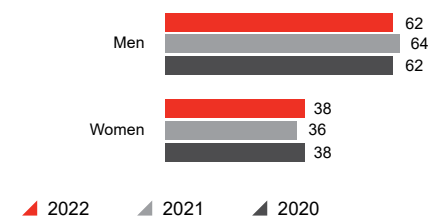
405-1

Gender structure of the Group's employees by levels is shown below. More details on this information is contained in the Sustainability Data section.

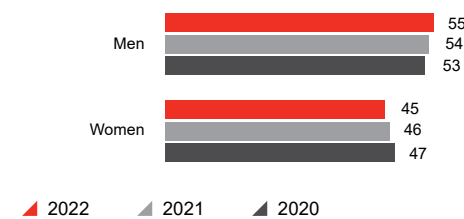
Percentage of men and women in the Executive Boards (MOEX, NSD, NCC) (%)



Percentage of men and women in the functional department managers positions (%)



Percentage of men and women in specialist positions (%)



Moscow Exchange Group focuses on the social and cultural diversity of its employees, providing them with equal opportunities in terms of training, career

development, and social benefits. This approach leads to a more productive and comfortable work environment.

The Group follows the recommendations of the Bank of Russia in forming and maintaining the continuity of the Supervisory Board; including based on the principle of gender diversity.

In terms of the percentage of women among the workforce, the Group adheres to global best practices. Despite some challenges, particularly the fact that there are far fewer women in the Russian IT sector than men, the Group takes active steps to hire women in its IT departments.

202-1

Moscow Exchange Group provides its employees with a competitive level of remuneration. In 2022, the average salary of specialists and workers of the first grade, including bonuses, was 4.22 times higher than the minimum wage set in Moscow as of 1 January 2022.

In 2022, Group companies unified HR processes and developed and approved new documents regulating the remuneration system in all Group companies.

On 26 January 2023, a Memorandum on Social Responsibility was approved, declaring respect for human rights, gender equality and socio-cultural diversity, and condemning all forms of physical violence, verbal abuse and sexual harassment.

In 2022, a survey of Group employees on gender equality was conducted for the first time to identify priority policy areas for promoting gender equality at the Moscow Exchange Group. Similar surveys are planned to be conducted on a regular basis.

During the reporting period, a Moscow Exchange working group on gender equality was formed and a kick-off meeting was held to discuss the Moscow Exchange's current position in terms of gender aspects of operations, including in comparison with foreign exchanges, proposals on improving HR policies with respect to respecting women's rights and supporting maternity and paternity.

In 2022, a programme of additional social benefits and compensation for employees selected as key experts of the units was launched.

Occupational health, security protection, safety and well-being

403-6 403-3

Under certain conditions, employees are offered such opportunities as working from home or flexible working hours. In accordance with the Labour Code of the Russian Federation and at the request of the employee, the employer may establish part-time work for pregnant women, for a parent (guardian, custodian) with a child under the age of 14 or a disabled child under the age of 18, and for employees caring for a sick family member. Women and men (at the choice of the family) are given parental leave to care for a child up to three years of age; mothers who start work early are given breaks to feed their child up to one and a half years of age; and additional four days off per month with pay to care for a child with a disability.

Although working conditions at Moscow Exchange Group are not associated with high risks of injury and occupational disease, the Group invests in maintaining a safe working environment and maintaining the health and well-being of its employees.

403-9 403-10

Over the last three years, no occupational injuries or diseases have been reported in the Group's companies. Also, the Group is not aware of any cases of occupational injuries or diseases among contractors working at Moscow Exchange sites.

In 2022, Moscow Exchange Group did not record any cases that can be classified as micro-injuries or occupational accidents in accordance with the Russian Labour Code.

The cases of employees applying for voluntary health insurance, including to corporate doctors, relate to personal health conditions of employees that are not related to the company's operations.

A procedure for recording and investigating accidents and micro-injuries at Moscow Exchange Group is currently being developed with subsequent approval as a local regulatory document.

Plans for 2023

Moscow Exchange will continue to work to maintain decent working conditions for its employees. At the same time, given the challenging foreign policy environment, the Group does not rule out the possibility of adjusting plans, including those included in the Sustainability Roadmap. Nevertheless, Group companies will continue to develop key initiatives planned for 2023 and beyond, adapting them to the new environment. Sustainability projects that are already underway are likely to continue. The Group's management will do its utmost to preserve jobs and the social programmes most important to employees.

As part of the Sustainability Roadmap, the Group has planned the following initiatives and activities:

- continuing the implementation of the working time mobility programme;
- conducting an analysis of the emotional health problems of employees and possible solutions;
- carrying out a human rights risk assessment.

The key areas of activity in the area of HR management for 2023 are:

- development of corporate culture, including updating corporate values;
- development a Long-Term Management Incentive Programme for 2023-2025;
- further the development of the Supplemental Social Benefits and Compensation Programme for the Group's key experts.

The Exchange will also continue to familiarise its employees with the sustainability agenda and help them develop their knowledge and skills in this area.

E | ENVIRONMENTALLY FRIENDLY AND TRUSTED MARKET INFRASTRUCTURE

0

total number of data privacy incidents or breaches detected

1

number of significant market disruptions

0

IT system malfunctions

99.99%

high availability of Moscow Exchange's IT systems

3-2 FN-EX-550a.3

A market's effective functioning and appeal are determined by its infrastructure¹, which should ensure high-quality and accessible information for end-users, brokers, and investors; reliable barriers to deter market manipulation and conflicts of interest; smoothly operating IT systems; and the ability to process substantial flows of information between issuers and providers of capital.

Cybersecurity is an integral part of Moscow Exchange Group's risk management strategy and system. Measures taken to enhance information security ensure that the quality of management systems and the reliability of infrastructure are in line with global best practices.

This section describes measures that Moscow Exchange Group takes to ensure business continuity, including the reliability of information, data confidentiality, availability of operations, and information security.

Moscow Exchange Group's objectives and the UN Sustainable Development Goals:

- SDG 9.b Ensure sustainable financial infrastructure

2022 highlights

For data from 2020, 2021 and 2022, see the Environmentally Friendly and Trusted Market Infrastructure subsection of the Sustainability Data section. For the key policies, procedures, and responsible departments, see the Environmentally Friendly and Trusted Market Infrastructure subsection of the Sustainability Approaches and Procedures section.

Risk management

3-3 2-24

The overall risk management system aims to guarantee reliable infrastructure. In 2022, Moscow Exchange Group continued to implement the 2021–2024 Risk Management System Development Strategy and Roadmap, which sets out key performance indicators, risks, and preventive actions, including those specifically aimed at information security risks.

The Group's progress towards achieving the goals and objectives established in the strategy is monitored regularly: status reports are submitted to collegial executive bodies for review. We also use KPIs to assess the effectiveness of the risk management system.

¹ The stock market infrastructure refers to payment systems, central securities depositories, securities settlement systems, central counterparties and trading repositories.

As part of the Strategy and Roadmap, Moscow Exchange has implemented an approach to determining its risk appetite. The component risks carry equal weight and are deemed to be material for the Group and all its companies.

ESG risk management

2-24

The expectations and interests of the Group's stakeholders align with Moscow Exchange Group's high level of preparedness for new ESG risks and opportunities. Approaches to identifying priorities and opportunities are determined based on the company's strategic goals and objectives.

By analysing key sustainability trends, risks, and opportunities at an early stage, the Group can enhance its strategic performance. Prioritising key economic, environmental and social issues as risks and opportunities is an integral part of Moscow Exchange Group's operations and internal processes.

201-2

Climate-related risk management

In 2022, Moscow Exchange continued to develop the climate risk and capacity management process in line with the TCFD Recommendations, approved the Climate Risk Management Policy, included climate risk in the risk map, and updated the risk and capacity assessments.

As part of the development of climate risk and opportunity management tools, the following tasks are planned:

- Assessment of the risks and opportunities associated with climate change;
- Training employees to anticipate likely events and threats.

The short-term horizon (12 months) includes an annual review of transitional and physical climate-related risks, as well as regular monitoring of the conditions

and rules for identifying them. Moscow Exchange incorporates international practices for identifying and assessing climate-related risks into its operations.

The following climate-related risks were identified in the reporting period:

- transition risks, including market, reputational, political, legal, and technological risks;
- physical risks (acute and chronic).

Moscow Exchange Group is expanding its partnerships with various institutions in order to disseminate knowledge and expertise. It is developing models for identifying and assessing climate-related risks.

[More information on TCFD initiatives can be found in the Climate Agenda subsection.](#)

In the reporting year, Moscow Exchange Group achieved all its goals and objectives. This lays a solid foundation to further develop the risk and opportunity assessment process with respect to sustainability.

Emerging risks are identified systematically, and the business units responsible for managing the risks detected are designated during the identification phase. For each risk, a management strategy and mitigation measures are developed in accordance with the risk management system. Each risk is controlled and monitored.

Information security

FN-EX-550a.3

Moscow Exchange Group continues to implement its information security programme for the years 2021–2024. The projects under way will help to maintain the Group's development pace and level of reliability.

The Group's companies have electronic and computer crime and personal liability insurance policies to mitigate operational and information security risks.

FN-EX-550a.1

In 2022, MOEX had only one failure that led to the suspension of trading.

On the absence of certain client codes in the FX trading and clearing system

On 5 September 2022 at 10:26 a.m. Moscow time, the Exchange revealed the absence of certain client codes in the current configuration of the FX trading and clearing system (TCS), which restricted the ability of individual trading participants to conduct transactions by their clients.

Updating the necessary data promptly could take considerable time and cause additional problems for traders, so the Exchange decided to suspend trading on the FX and Precious Metals Markets from 10:50 a.m. Moscow time, which it announced on its website in advance.

At 11:57 a.m. Moscow time, the FX Market trading system became available for order withdrawal after the necessary client code data was uploaded and the TCS restarted.

Robust IT infrastructure

In 2022, the Group continued to implement measures to maintain the required level of system reliability. For example, a new disaster recovery data centre NORD Tier II was commissioned and relocating systems from the current backup data centre (M1) began. A VDI project was successfully completed to provide the employees of the Exchange and the operating units with a safe, secure and convenient workplace.

As part of the import substitution programme, multiple tests of equipment and software from Russian providers were carried out, providing MOEX with a large number of reliable suppliers for further system development tasks.

Infrastructural reliability remained at 99.99%. And apart from the short-lived FX Market trading code incident, there were no significant infrastructure failures affecting the availability of critical systems throughout 2022.

Data governance activities implemented:

- development of the previously implemented operational model for data quality management to minimise risks (reputational, regulatory, operational) and increase the level of satisfaction of business users with data services;
- development of flexible methodologies for testing and implementing data monetisation tasks.

Access to products and services

FN-EX-550a.3

Moscow Exchange continues to provide investors and market participants with equal and unhindered access to its products.

In 2022, work continued on developing clients' personal accounts. Clients will be able to sign contracts and submit applications via a single interface, which vastly improves the client path.

The new SIMBA and TWIME ultra-fast protocols for accessing the Equity & Bond and FX Markets were introduced to clients in the collocation zone.

Finuslugi.ru

The Group continues to develop the Finuslugi personal finance platform by connecting new financial service providers and expanding its product line. In the future, new types of people's bonds, loans and other products from banks, asset managers and insurance companies will become available on the platform.

The year 2022 saw the following significant updates to the Finuslugi platform:

- new loan services: a loan calculator, a credit rating, a common loan application on the website and in the Finuslugi app, and a Credit History service;
- an additional issue of Kaliningrad bonds;
- in-app marketing push notifications as a convenient channel for interacting with customers to sell products;
- registration in the personal account of Finuslugi was built into the process of purchasing compulsory car insurance (OSAGO), and each customer now has automatic access to Finuslugi personal account;
- in partnership with banks, exclusive deposits were launched on Finuslugi (MKB, Dom.RF, etc.).

Registrar of Financial Transactions

The Financial Transactions Registry (FTR) was launched in 2019 in conjunction with the launch of the Finuslugi platform. Created on the basis of NSD, the FTR accumulates information on all transactions made on any financial platform.

At the end of 2022, the FTR registered information from six financial platforms on six financial products. The number of users was 21,500 individuals and the total number of registered transactions was 82,800. FTR functionality was expanded to process information on new products (bank cards). A tariff model for all instruments was developed and agreed with the Repository Services Users Committee (FTR subcommittee).

Access to transactions with federal loan bonds

In December 2021, the Finuslugi.ru platform launched the first service for purchasing and selling federal loan bonds of constituent entities of the Russian Federation. Russian regions' guaranteed-income securities will only be traded on the exchange, and no brokerage account will be required to purchase them.

Not only are bonds a tool for improving the financial literacy of the public, they also facilitate ESG projects: funds raised will be used to clean up bodies of water, reclaim landfill sites, and implement urban redevelopment projects.

The Kaliningrad Region's coupon bonds are available for purchase. The coupon rate is 9% per annum, with a minimum investment amount of RUB 1,000. All the funds raised will be put towards development and improvement of the Kaliningrad Region. Investors will be able to choose a project to invest in, and they will receive a quarterly report on its implementation. Information on implementation of the project will be provided by the Kaliningrad Region.

Consumer lending service

In 2022, Finuslugi doubled its customer base to more than 1 million people. Finuslugi covers all regions of Russia, both major cities and towns of 5,000 people or more. In 81 cities from 2022, customer identification and access to all platform products is on the same day.

During the year, five banks and four insurance companies joined Finuslugi, bringing the total number of banks to 19 and insurance companies to 17. In addition, there are offers from 150 banks and 150 insurance companies on the marketplace.

MOEX Treasury platform

In 2020, Moscow Exchange launched MOEX Treasury, a terminal for corporate clients with direct access to trading. MOEX Treasury allows bidders to perform transactions on Moscow Exchange markets through a single user-friendly interface, including:

- conversion and swap transactions on the FX Market;
- deposits with a central counterparty on the Money Market;
- hedging opportunities on the Derivatives Market;
- deposit auctions in the M-deposits segment.

MOEX Treasury also provides integration with bidders' personal accounts, as well as access to the Transit 2.0 system, which is an advanced platform used by banks and corporations to exchange financial messages and electronic documents. The solution is based on NSD's Electronic Data Interchange (EDI) system.

In 2022, a new convenient model for providing access to the MOEX Treasury terminal was introduced – package offers for access to the system, which made it possible to significantly speed up and simplify the entry of new trading participants to the financial market. Also in 2023, new functional services will appear: chats, analytics on operations, RFQ, standardised derivative financial instruments, integration with a clearing terminal and new opportunities in terms of document flow.

Spectra platform

The Spectra platform provides futures and options trading. A second pricing model was introduced in 2022, providing negative-pricing trading and a mechanism for switching between models.

High-speed market data feeds

In October 2021, a new high-speed derivatives market data feed, SIMBA SPECTRA, was rolled out. The service allows clients to receive market signals faster than all previously available connectivity methods.

The service speed is ensured by a newly-established software interaction between the SIMBA SPECTRA gateway with the central component of the trading system and a high-speed segment of the network infrastructure designed specifically for transmitting large volumes of data to multiple recipients in real time.

The new service implements the Public Data First¹ principle and eliminates the need to use multiple sources simultaneously to obtain market signals. The protocol is based on the modern Simple Binary Encoding, which significantly speeds up the process of obtaining and processing market data by clients' trading algorithms. Similar technologies are successfully used at the largest exchanges worldwide, supporting the trend of development of high-tech client trading systems.

The new service, combined with the TWIME trading protocol, delivers an optimal IT solution for clients whose trading strategies are extremely sensitive to the speed of market data feed and order entry latency.

In October 2022, Moscow Exchange introduced new high-speed market data distribution protocols SIMBA ASTS in the Equity & Bond and FX Markets. The new service is an in-house development of the Exchange and is intended for banks, brokers, algorithmic and high-frequency traders, which co-locate their equipment in the Exchange's data centre.

The main advantages of the service are:

- speed which is far superior to all existing protocols;
- unified message formats;
- an ability to quickly assess movements of the best prices;
- a dedicated high-speed network infrastructure in the colocation area.

New access protocol for FX and Equity & Bond Markets

October 2022 also saw the launch of FIFO TWIME ASTS, a new access protocol for FX and Equity & Bonds Markets that significantly accelerates the delivery and processing of trade orders compared with the previous FIFO MFIX Trade protocol.

The new service is able to transmit orders to the trading system without waiting for a response on the processing of a previous order (asynchronous order delivery), making trading more convenient for high-speed traders. Strict First-In – First-Out (FIFO) compliance improves the transparency and predictability of the exchange's IT infrastructure.

Information security highlights:

- RUB 0 in financial losses resulting from failures of the information security system and cybersecurity;
- no breaches involving personal data leakage or disclosure of confidential information.

Plans for 2023

In 2023, Moscow Exchange plans to:

- review and revise the current strategy;
- review the supply chain and import substitution;
- adapt the technological landscape and infrastructure to the revised strategy;
- introduce new risk management tools, including systems that incorporate machine learning and scenario analysis;
- train staff on anticipating probable events and threats;
- analyse financial and non-financial risks integrated in the risk map;
- audit information security in accordance with ISO 27001 and ISO 22301.

¹ Public exchange information is published faster than private data.

RESOURCE EFFICIENCY AND ENVIRONMENTAL IMPACT

The Moscow Exchange Group shares the environmental concerns of its stakeholders, and it strives to make a difference by minimising any negative impact on the environment.

The primary environmental impact of the Group's companies stems from electricity consumption associated with the operation of server and computer equipment processing a significant amount of data (the data centres account for about 36.6% of Moscow Exchange's total electricity consumption). Generation of the electricity consumed by the Group's companies generates GHG emissions that can affect the climate. Therefore, the management of Moscow Exchange Group incorporates climate risks into its risk management system and keeps track of GHG emissions. [See the Climate Agenda subsection for details.](#)

Other environmental impacts, including water consumption and waste generation, are mainly associated with the operation of Moscow Exchange's offices. This subsection provides information on the types and results of environmental impacts of MOEX's activities: energy consumption, water consumption and wastewater discharge, air pollutant emissions and waste management. Quantitative indicators can be found in the section in the Resource Efficiency and Environmental Impact subsection of the Sustainability Data section. Methods for managing environmental issues are described in the Sustainability Approaches and Procedures section.

Moscow Exchange Group's objectives and the UN Sustainable Development Goals:

- SDG 12.2, 12.4, 12.5, 12.6, 12.8 Responsible consumption and production
- SDG 13.1, 13.3 Climate action

2022 highlights

The 2022 Sustainability Roadmap of the Moscow Exchange Group provided for an action to update environmental documentation within the framework of the applicable requirements of environmental legislation. In order to implement this measure, the initial stage included an analysis of the requirements of the current legislation in the field of environmental protection

and environmental management, as well as best practices for the development of strategic documents of companies in the field of the environment, taking into account the approaches to the assessment of these practices by ESG-agencies.

In addition, in 2022, the Moscow Exchange office on Bolshoi Kislovsky Lane was assigned a category III negative environmental impact, which requires more attention to managing environmental impacts.

The best practice in environmental impact management is to implement an environmental management system (EMS) in accordance with the international standard ISO 14001:2015, Environmental Management Systems – Requirements and Guidelines for Implementation. The main element of the EMS is the Environmental Policy, which defines the goals and objectives of the Company in the field of environmental protection and nature management.

In accordance with the analysis carried out, a draft Environmental Policy of Moscow Exchange was developed, taking into account the environmental impact aspects.

The policy covers all environmental elements of the previously adopted MOEX Sustainability Roadmap and the UN SDGs, MOEX ESG Vision and defines the basic principles, objectives and priorities of MOEX's environmental protection and management activities, including the nature, scale and environmental impact of these activities.

The objectives of the Moscow Exchange Environmental Policy in the field of environmental protection and natural resource management are:

- 1) to facilitate the transition to a circular and low-carbon economy;
- 2) to minimise own direct and indirect negative impact on the environment and climate.

In December 2022, the Environmental Policy was approved by the Executive Board and approved on 28 April 2023 by the Supervisory Board.

In addition, the Executive Board was instructed to ensure the development and approval of internal documents establishing the EMS of Moscow Exchange prepared in accordance with the ISO 14001:2015 standard in 2023.

Energy consumption

302-1 302-3 305-4

The Group has continual measures in place to optimise electricity and heat consumption, including the following:

- switching server processors to energy-saving mode when not under load;
- turning off office lighting and climate control equipment outside office hours;
- replacing light fixtures with energy-saving LED lamps when building or renovating premises.

In 2021, Moscow Exchange Group transferred all its office buildings on Bolshoi Kislovsky Lane and Spartakovskaya Street in Moscow to green electricity produced at Ulyanovsk Wind Farm-2. Over the year, Moscow Exchange developed a contractual arrangement that allows end consumers of electricity to purchase power from renewable sources through a commission agreement with a guaranteeing supplier (Mosenergosbyt JSC in the case of Moscow Exchange) on the wholesale electricity and capacity market. This model is unique in Russia.

In early 2022, the Group signed another commission contract for the supply of green energy to the DataSpace data processing centre, where Moscow Exchange's hardware and software systems are located. As a result, the actual energy supply in 2022 amounts to more than 11 million kWh, which represents more than 72% of the MOEX's electricity consumption. The use of clean and renewable energy will enable the Exchange to minimise its carbon footprint, in line with best practice in sustainable development.

At the end of 2022, the electricity consumption of the companies of the Moscow Exchange Group decreased by 1% compared to 2021 and the heat consumption decreased by 9%.

MOEX's immediate plans include continuing to implement measures to reduce gross electricity consumption by switching to more energy-efficient network equipment.

Use of green energy will help prevent GHG emissions and reduce Scope 2 indicators.

Water consumption

303-3

Total water consumption as well as wastewater discharge increased slightly compared to 2021, while the water withdrawal intensity per revenue decreased by 24% to 0.3 cubic meters / RUB million. The water withdrawal intensity per employee is 11.56 cubic metres per person, which is 5% lower than in 2021.

Air emissions

305-7

In 2021, an inventory of emissions of harmful (polluting) substances into the atmospheric air and their sources was carried out for the building complex of Moscow Exchange on Bolshoi Kislovsky Lane.

As a result of the inventory, it was found that 14 types of pollutants are emitted by Moscow Exchange as a result of its operations. Information on the amount of emissions for each type of pollutant is given in the Sustainability Data section (Resource Efficiency and Environmental Impact subsection).

Total air pollutant emissions in 2022 were 0.145 tonnes, including 0.14 tonnes of gaseous and liquid and 0.005 tonnes of solids.

Waste management

306-1 306-2 306-3

The main types of waste in the Group's companies are municipal solid waste, waste electronic equipment, etc.¹

In 2022, the volume of waste generation decreased by 20.8%, mainly due to a reduction in the generation of low-hazardous waste (hazard class IV). In accordance with legal requirements and the Draft Waste Generation and Disposal Limits, all generated waste was transferred to specialised organisations. At the same time, compared to the previous year, in 2022 the amount of waste transferred for treatment increased by 30 times, and the amount of waste transferred for neutralisation and recycling increased by 69.85%.

Group companies have organised separate collection of household waste, and wastepaper is collected and sent for recycling.

Plans for 2023

In accordance with the Sustainability Roadmap, the Group plans to implement the following activities:

- implementation of an EMS at the Exchange in accordance with the international standard ISO 14001:2015;
- increase in the share of green energy consumption in the Group's energy mix;
- implementation of annual energy efficiency measures;
- development of the Group's climate risk management system and engagement of with financial market participants on the climate agenda;
- implementation of annual waste management and water management activities;
- environmental campaigns for the collection of certain types of waste.

A | ADVANCED PRACTICES OF RESPONSIBLE INVESTING

Exchanges contribute significantly to raising capital for improving sustainability. They also play an important role in creating financing facilities to help modernise the economy in line with climate goals.

As a member of the Sustainable Stock Exchanges (SSE) initiative, Moscow Exchange works hard

to develop sought-after financial ESG instruments and promote them among Russian companies, investors, and financial institutions. Moscow Exchange is striving to create a new market segment for environmentally and socially significant projects that are appealing for issuers and investors.

RUB 276 billion
bonds outstanding
in the Sustainability sector
(versus RUB 191 billion in 2021)

RUB 5.6 billion
worth of bonds placed by SMEs
in the Growth sector (versus
RUB 7.9 billion in 2021)

RUB 225 billion
worth of securities
traded in the Innovation
and Investment Market sector
(versus RUB 322 billion in 2021)



Launch of carbon trading system

Moscow Exchange promotes responsible investment both as a company and as a provider of financial infrastructure, recognising that the generation of long-term sustainable returns is dependent on well-governed social, environmental, and economic systems.

Moscow Exchange Group also promotes modern corporate reporting requirements, thereby contributing significantly to more transparent markets. The Exchange has developed infrastructure to foster a local investor base, and it provides access to funding for innovative companies, as well as small and medium-sized enterprises.

FN-EX-410a.3 3-3

Moscow Exchange requires issuers to disclose the following information that may affect stock prices:

- changes related to the company's financial health;
- major corporate transactions, including restructurings, mergers, and acquisitions;
- changes to the management team;
- positive or negative material information on issuers' products and services;
- legal or regulatory changes affecting the issuers's ability to conduct business.

The grounds for suspending trading in securities are set out in the Listing Rules of Moscow Exchange. The decision to suspend trading in securities is made by Moscow Exchange on the basis of an expert opinion issued by the Listing Department. The Exchange contributes significantly to increased transparency of disclosures through its requirements for issuers.

3-3

As part of the work of the Bond Issuers Committee and user committees, the Exchange performs regular analyses of feedback from customers and market participants about new ESG products; it also works to increase their awareness on such topics.

This subsection covers the key responsible investment instruments of Moscow Exchange and its educational programmes for market participants.

Moscow Exchange Group's objectives and the UN Sustainable Development Goals:

- SDG 8.3, 9.3 Increase growth opportunities and access to financial markets for small and medium-sized enterprises
- SDG 8.10 Develop financial infrastructure for better access to capital markets, promote the development of a local investor base
- SDG 9.1 Increase access to financial services for retail investors
- SDG 9.b Increase growth opportunities and access to financial markets for companies that develop innovative products
- SDG 12.6, 12.8 Improve the quality and quantity of ESG information disclosed by issuers
- SDG 12.6, 13.3 Develop instruments to promote responsible investment

Major highlights in 2022

For comprehensive performance metrics for 2020, 2021 and 2022, see the Advanced Practices of Responsible Investing subsection of the Sustainability Data section. For the key policies, procedures, and responsible departments, see the Advanced Practices of Responsible Investing subsection of the Sustainability Approaches and Procedures section.

¹ For more information, see the [Sustainability Approaches and Procedures](#) section.

Sustainability sector

3-2 203-2

In 2019, Moscow Exchange Group established the Sustainability sector to help issuers raise funds for projects that comply with the UN SDGs and national projects of the Russian Federation. The Sustainability sector consists of four segments: green bonds, social bonds, sustainability bonds (as of 2021), and a segment for national and adaptation projects. [For more details on the Sustainability sector and its core listing rules, see the Sustainability Approaches and Procedures section.](#)

The creation of such sector is in line with the global best practices and represents one of the most important steps for Moscow Exchange as part of the UN initiative of SSE. About 130 exchanges take part in the initiative with only 46 of them currently having such a listing category.

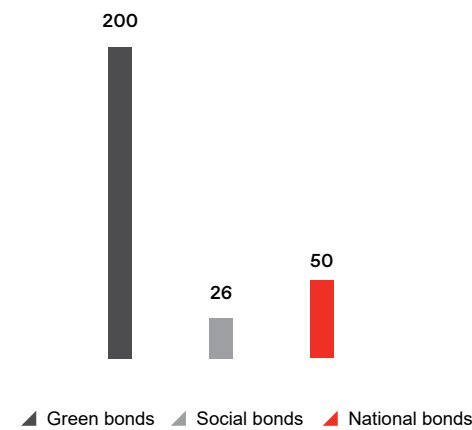
As more and more investors prefer sustainable projects targeting the improvement of ecology and social environment, the Russian business is increasingly thinking about corporate social responsibility and application of the ESG principles in their operations. The sustainability sector will provide for proper positioning of issuers and investors with the targeted nature of investments.

RUB 276 billion
bonds outstanding
in the Sustainability sector

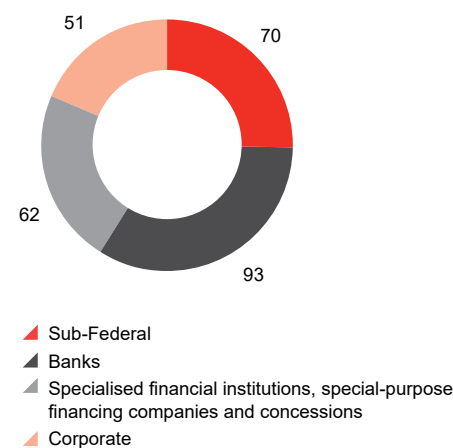
RUB 106.2 billion
of bonds placed in the Sustainability sector
in 2022

As of 31 December 2022, 27 issues of ESG bonds of 17 issuers were in circulation in the Sustainability sector.

Sustainability sector structure by bond type as of the end of 2022 (RUB billion)



Sector structure by issuer type as of the end of 2022 (RUB billion)



Building a market for trading in carbon units

The carbon unit register operated by Kontur JSC has been functioning in Russia since September 2022.

The carbon unit is a verified implementation result of the climatic project expressed as a mass of greenhouse gas equivalent to 1 tonne of carbon dioxide.

The first climatic project was registered and the first carbon units were issued in the same month. DalEnergolInvest Company from the Sakhalin Region acted as the project contractor. The Russian Energy Agency of the Ministry of Energy of the Russian Federation (Minenergo of Russia) coordinated the structuring of the first transaction for the sale of carbon credits.

On 26 September 2022 the first exchange transactions were carried out with carbon units at the NAMEX. Exchange trading in carbon units is organised as a commodity auction: the vendor of carbon units sets the starting price and buyers participate in competitive bidding by increasing their bid prices. At the end of the first day, two deals were concluded purchase and sale with a total volume of 20 carbon-units. Weighted average selling price amounted to 1 thousand rubles per carbon unit. An interest is currently being observed in registering carbon units by Russian companies implementing projects to reduce their own carbon footprint.

Companies, which strategies include achieving carbon neutrality, are also interested in the carbon market as a means of reducing their carbon footprint.

ESG guidelines

3-2 203-2

Education and information of financial and commodity markets participants on the ways to integrate the ESG principles into the companies' operations is an important mission for stock exchanges all over the world. Moscow Exchange meets that role by organizing a conference sessions and webinars, as well as by supporting similar events of its partners.

The first Guidelines for Best Sustainability Practices (ESG Guidelines) published in 2021 by Moscow Exchange was positively received by issuers seeking to follow the sustainability principles. That is why a decision was made in 2022 to update the ESG Guidelines in order to reflect modern ESG trends. In particular, the updated ESG Guidelines included the description of the market for exchange trading of carbon units, the latest trends towards harmonisation of non-financial reporting and the specifics of the non-financial and climatic information disclosure, as well as new aspects of corporate sustainability through the biological diversity support and supply chain management. In addition, the ESG Guidelines were supplemented by detailed instructions on how to prepare for the release of ESG in the Sustainability Sector.

Moscow Exchange believes that the ESG Guidelines may be used as a benchmark in the course of developing or improving corporate sustainability strategies, which will contribute to improving the quality of company management. The fact that some 300 participants joined the presentation of the ESG Guidelines proves its importance for the Russian market.

ESG indices

3-2 203-2 FN-EX-410a.4

Moscow Exchange Group calculates and tracks Russia's first sustainability indices. This is a joint project with the Russian Union of Industrialists and Entrepreneurs (RSPP). The MOEX-RSPP ESG indices help reveal a correlation between the quality of disclosures on responsible business practices and the yield dynamics of issuers' stocks.

3-3

Each year, RSPP evaluates reports and ESG indicators of companies with considerable market capitalisation operating in Russia. Moscow Exchange stock indices are based on this evaluation, as well as their derivatives, which create the basis for ESG exchange-traded funds (ETF). Since January 2021, Moscow Exchange has been listed on the RSPP Responsibility and Transparency Index and the Sustainability Vector Index.

Moscow Exchange's sustainability indices

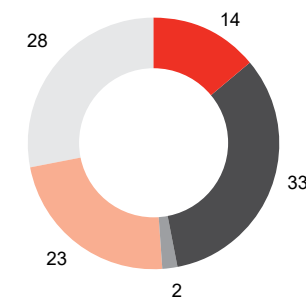
- MOEX-RSPP Responsibility and Transparency Index, MRRT (calculation is based on the stock prices of 25 issuers);
- MOEX-RSPP Sustainability Vector Index, MRSV (calculation is based on the stock prices of 21 issuers);
- MOEX-RSPP Sustainability Vector Total Return Index (calculation base includes companies with the best sustainability indicator dynamics, taking into account reinvestment of dividends);
- MOEX-RSPP Russian Companies Sustainability Vector Total Return Index (launched in 2021 based on the stock prices of 19 issuers);
- MOEX RSPP — RSHB Russian Corporate Eurobonds ESG Index (launched in 2021; based on the Eurobond loans of Russian corporate issuers listed on the MOEX-RSPP Sustainability Vector Index. The calculation of this index was temporarily stopped in April 2022).

A new version of the Sustainability Vector Index, the MOEX-RSPP Russian Companies Sustainability Vector Index. The methodology factors in regulatory requirements for non-state pension funds, making it possible to invest pension savings in a basket of index-linked securities or a financial product whose underlying asset is the new indicator.

FN-EX-410a.4

A total of 43 indicators were used to calculate the RSPP Responsibility and Transparency Index in 2022.

Indicators used in the Responsibility and Transparency Index, 2022 (%)



- ▲ Economic
- ▲ Social (personnel)
- ▲ Social (general public)
- ▲ Environmental
- ▲ Governance

OVERVIEW OF MOSCOW EXCHANGE GROUP'S REPORTING SUITE

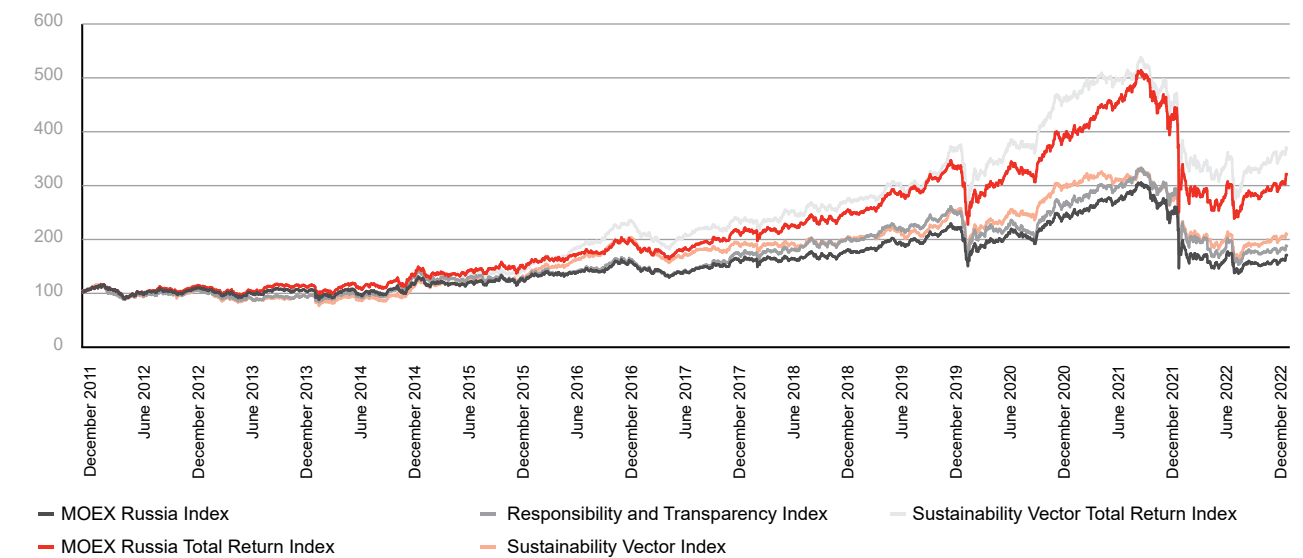
2022 SUSTAINABILITY PERFORMANCE HIGHLIGHTS

SUSTAINABILITY DATA

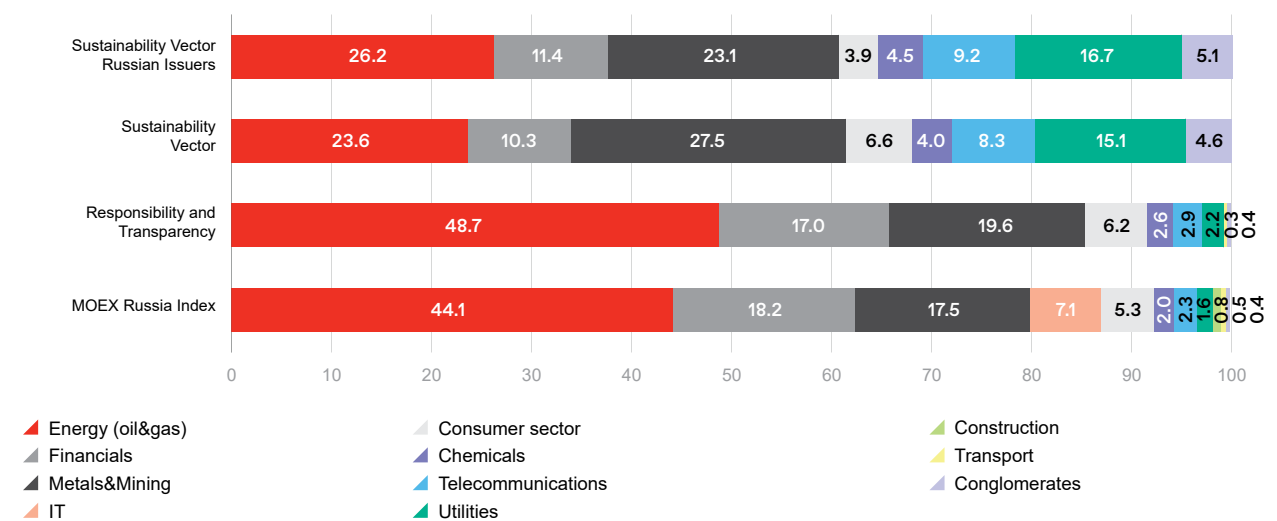
SUSTAINABILITY APPROACHES AND PROCEDURES

APPENDICES

Indices performance, 2011–2022 (%)



Index structure by industry in 2022 (%)



ESG ETFs

As of the end of 2022, the number of ETFs on the ESG indices of the Moscow Exchange amounted to six funds:

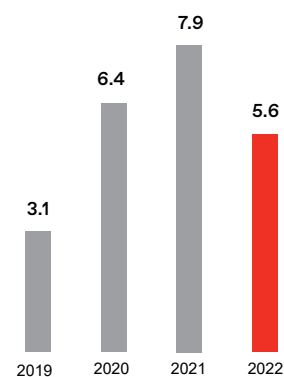
- ESGR ETF RSHB-MOEX-RSPP VecTR (ESGR);
- ESGR ETF RSHB-MOEX-RSPP Russian ESG Eurobonds (PRIE);
- SBRI ETF Responsible Invest (SBRI);
- WIMF ETF Russian Equity ESG (ESGEG);
- TSST ETF TINKOFF ESG LEADERS (TSST);
- ETF “Technologies of the Future” by “Sistema Capital” Management Company (SCFT)

Growth sector

3-3 203-2

In 2022 MOEX Group extended access to funds for small and medium-sized enterprises in the Growth sector, thereby facilitating their growth.

SME bonds placed in the Growth sector, 2019–2022 (RUB billion)



The Growth sector of Moscow Exchange was created for public offerings and for circulating the securities of promising small and medium-sized enterprises (for a detailed description of the sector and its listing rules, see the Sustainability Approaches and Procedures section).

To be included in the Growth sector, bonds need a credit rating of at least BB- on the Russian scale. In order to reduce the consequences of the negative

impact of the geopolitical situation and increased volatility in the financial market, the Exchange made a decision, Moscow Exchange has decided to use until 1 October 2022 the credit ratings of the issuer, bond issue, or guarantor (endorser), assigned as of 1 February 2022. After the end of the credit rating grace period in the Growth Sector, the basic requirements for a rating of at least BB- became effective.

As of 31 December 2022, 49 bond issues of 3 SMEs were traded in the sector. The total volume of SME bond placements amounted to RUB 5.6 billion.

To subsidise listing preparations, 25 issuers received coupon-interest income subsidies with the total amount of subsidies exceeding RUB 420 million.

3-3

As a support measure, Moscow Exchange Group has improved accessibility to the bond market for SMEs by waiving charges for listing bonds for flotations of up to RUB 400 million. The grace period was extended up to 31 December 2023.

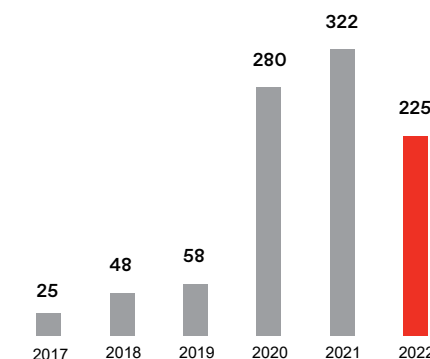
Innovation and Investment Market

3-3 203-2

Moscow Exchange contributes to the development of the innovation market by easing access to the financial market for high-tech companies. Moscow Exchange's goal is to attract investment to innovative companies using its exchange mechanisms and through cooperation with development institutions.

By the end of 2022, 31 securities were being traded on the Innovation and Investment Market sector, including nine shares, 19 bonds, one exchange-traded fund, and one closed-end pre-IPO fund. The total capitalisation of the sector amounted to about RUB 450 billion. The trading volume exceeded RUB 225 billion (~30% YoY). IIM issuers include companies from the following industries: biotech and medical technologies, internet and media, IT and telecommunications, and innovative technologies. In 2022, five new securities were placed on the IIM.

Trading volume in the IIM Sector, 2017–2022 (RUB billion)



To encourage high-tech companies to list on the stock exchange, the following types of government support are available:

- tax relief on income from the sale or other disposal of shares and bonds of Russian entities, and of investment units that are securities from the high-tech (innovative) sector of the economy, provided that they have been continuously owned by the taxpayer for at least one year prior to the date of their sale;
- the tax incentive applies to share transactions in high-tech companies with maximum market capitalisation of RUB 75 billion, bonds of issuers with maximum annual revenues of RUB 75 billion, investment units (maximum net asset value (NAV) of RUB 75 billion);
- as part of the [Take off – From Startup to IPO](#) initiative, approved by the Russian Government in 2022, small innovative enterprises will be eligible for grant support to co-finance innovative projects, with the grants to be provided by Federal State Institution Foundation for Assistance to Small Innovative Enterprises in Science and Technology. Each grant is capped at RUB 30 million; part of that amount may be spent on listing (legal support fees, investment banking services, marketing, and other services).

Plans for 2022

In 2023, the Group plans to keep improving its responsible financing practices:

- to continue to develop the Sustainability sector by issuing new types of bonds; create platforms for ESG market data; extend the ESG index family; improve the non-financial reporting practices of issuers;
- to stimulate the increase of the number of climate projects that have registered carbon units with the Russian operator Kontur JSC with subsequent sale on NAMEX;
- to host more educational events for issuers and market participants to share knowledge and experience in ESG management and responsible investment;
- to improve the Group's own ESG practices and sustainability reporting system;
- to meet KPIs under the national SME projects in terms of the size of securities offerings;
- to implement the Takeoff — From Startup to IPO government initiative at the IIM Sector.

T | TRUSTED RELATIONS WITH LOCAL COMMUNITIES

Moscow Exchange Group is cognizant of its responsibility to catalyse positive change in society and create benefits for the public. By uniting financial market participants (novice and professional investors, issuing companies, financial analysts) and other stakeholders, exchanges help mobilise capital, seek out new opportunities for economic growth, and solve global problems. Moscow Exchange helps create social value by supporting charity organisations, children and youth, and wider society.

This section describes the Group's major programmes, which are aimed at various stakeholders. They include educational and partner projects and charitable and voluntary corporate initiatives. Moscow Exchange Group advocates for financial literacy and strives to support socially vulnerable groups. Throughout its history, it has consistently worked to support its community and taken various actions for the benefit of the market and the public, and to protect the environment.

Moscow Exchange Group's objectives and the UN Sustainable Development Goals:

- SDG 4.3 Improve the financial literacy of the public
- SDG 5.5 Contribute to ensuring equal opportunities for women in business
- SDG 12.6, 12.8 Develop corporate volunteering and charity activities, integrate corresponding information into the reporting cycle
- SDG 12.6, 12.8 Improve the quality and quantity of ESG information disclosed by issuers
- SDG 12.6, 12.8, 13.3 Raise companies' awareness of sustainability trends, standards, and practices
- SDG 17.16, 17.17 Expand partnerships for sustainable development with various institutions to spread knowledge and experience in order to achieve the Sustainable Development Goals

Major highlights in 2022

Performance indicators for 2020, 2021 and 2022 are disclosed in the Trusted Relations with Local Communities subsection of the Sustainability Data section. Information on major policies, procedures, and responsible departments is given in the Trusted Relations with Local Communities subsection of the Sustainability Approaches and Procedures section.

Moscow Exchange Group's efforts to improve financial literacy

203-2 413-1

The Group is expanding its involvement in projects to develop the financial market by attracting new participants and improving their financial literacy. Moscow Exchange's educational programmes have different formats, and most are designed for novice investors.

Against the background of high volatility in the financial markets, the educational initiatives and training activities of the Exchange gain particular social significance.

Over 250 events were conducted in the reporting period to improve financial literacy, which were attended by some 500,000 people.

In 2022, the Exchange continued promoting the Investor's Way basic course both at the Moscow Exchange School and through its partners. For example, in 2022 the Investor's Way course became available on the Okko streaming service and at Tinkoff, the largest retail broker.

In response to high volatility observed in 2022 the following new training courses were launched: Eight Mistakes of the Investor, Financial Markets – Time of Change. The experts on these programmes were leading analysts from brokerage companies who provided investors with up-to-date information in a fast-changing environment.

Educational and outreach programmes of the Exchange also continued in the reporting year. All programmes are constantly being improved based on the analysis of the student behaviour and their feedback.

A mobile application for the Moscow Exchange School project was announced for private investors in summer 2022. The mobile application not only allows you to study educational content in the form of online courses and articles, but also to follow the quotations of exchange-traded instruments. Over 5,000 people have used the mobile application in less than six months.

Apart from own educational programmes of the Exchange, partner projects with the Bank of Russia were proposed and the following actions were taken in 2022.

- The fifth All-Russian Online Financial Literacy Test for Population and Entrepreneurs was organised. Traditionally, the event is open to everyone and there is a separate category for SMEs. In the reporting year participants were given the opportunity to participate individually and in groups. A family test was offered as well.
- The Exchange participated in the Financial Literacy Week in Russian Regions project, as well as continued working in the Expert Council for Financial Literacy under the Bank of Russia and in working groups of the Financial Literacy Development Association.
- The Exchange takes part in the Competent Investor project for giving online financial literacy lessons to adults and students of universities, secondary vocational and general education institutions, children from organisations for orphans and children without parental care. About 1,000 schools participated in the project and over 2,000 school children connected to webinars simultaneously.

In 2022, Moscow Exchange also supported the socially important project for financial literacy named the Finathlon for High School Students, the All-Russian Olympiad in Financial Literacy, Financial Market, and Financial Service Consumers Right Protection. For several years now, the Olympiad has been the largest financial literacy project for high school students in the country. In 2022, over 81,000 high school students from 85 regions participated in the Olympiad.

Charity and sponsorship

Main charity partners of Moscow Exchange Group in 2022:

- Pronikaya v Serdtse (Reaching into the Heart) charity foundation;
- Deti Nashi (Our Children) charity foundation;
- BELA. Butterfly Children charity foundation;
- Klub Dobryakov (Club of Kind Souls) charity foundation;
- Federal State Autonomous Institution "National Medical Research Centre "Treatment and Rehabilitation Centre" of the Ministry of Health of the Russian Federation;
- Miloserdie (Mercy) orthodox support service;
- Nikitsky Scientist and Entrepreneur Club;
- National Research Nuclear University MEPhI;
- Rossiya association.

In total, in 2022 Moscow Exchange donated

RUB 114.05 mln
to charity projects

Sponsorship budget structure in 2022 (%)

Areas	Budget
Education and science	22.5
Community engagement	58.3
Sports and healthy lifestyle	15.2
Biodiversity	4.0

Charity programme structure and coverage in 2022 (%)

Areas	Beneficiaries structure	Cost structure by areas
Science, education and improvement of the financial literacy of the public	0.8	4.8
Support for veterans	1.3	2.8
Healthcare, rehabilitation, and care for people with disabilities and those affected by COVID-19	94.5	92.0
Other	3.4	0.4

In part of its charity activities, Moscow Exchange Group focused in 2022 on supporting Russian medicine. For this purpose the Group allocated RUB 100 million for the Federal State Autonomous Institution “National Medical Research Centre “Treatment and Rehabilitation Centre” of the Ministry of Health of the Russian Federation to purchase the modern medical equipment for surgeries and further physical rehabilitation of patients with musculoskeletal disorders.

In 2022, the Group continued cooperating with a number of charity foundations and organisations. The projects aimed at helping orphans and children with serious diseases were supported. As part of NSD interaction with Pronikaya v Serdtse, Deti Nashi, Butterfly Children, Elizavetinsky Orphanage, Klub Dobryakov charity foundations and Miloserdie orthodox support service, targeted assistance was provided to 14 foundation wards, and social training and individual psychological work was funded for 100 foundation wards, with a therapeutic exercise instructor working with the children for five months. In addition, assistance was provided in preparing the New Year presents for foundation wards.

As a result of the New Year charity event 812 children being the foundation wards received presents.

Moreover, in the framework of veteran support assistance was provided to 35 participants of the Great Patriotic War.

Some educational institutions received support as well. In particular, additional payments were made to the salaries of professors and employees of the Cybernetics Department of the National Research Nuclear University MEPhI.

The Donor’s Day events were held under volunteering projects in the Group. Thanks to three events arranged over a year together with the Blood Centre of the Russian Federal Medical and Biological Agency, the employees donated 40.5 litres of blood to young cancer patients of Dima Rogachev’s Centre (Dmitry Rogachev National Research Centre of Pediatric Hematology, Oncology and Immunology). During the year, two charity fairs were organised with the participation of the employees to collect funds and gifts for the foundation wards, and a campaign was organised for 1 June to collect children for camps together with the Volunteers for Orphans charity foundation. In cooperation with the Step Up educational centre, the necessary stationery was collected for the children in time for the start of the school year. In addition, the Groups’ employees participated in the More than Jogging project, under which funds were raised for treatment and rehabilitation of two wards of the Volunteers for Orphans foundation. As part of the Kind Caps project, 50 kg of caps were collected and delivered to a collection point. The proceeds were directed towards the treatment and rehabilitation of the foundation wards. The employees also

participated in Kind Grandfather project and purchased desirable gifts for 19 beneficiaries of the Klub Dobryakov foundation.

RUB 75.6 mln

were spent for sponsor initiatives in various fields of operation

In 2022, as part of sponsor activities in biological diversity Moscow Exchange Group for the first time implemented a large-scale environmental action to plant 10 hectares of new forest in biosphere reserves of the United Nations Educational, Scientific and Cultural Organization (UNESCO). Forest Save Company became a partner in the project. 40,000 trees were planted during the autumn campaign on two territories: the Ugra national park and the Smolenskoe Poozerie national park. Both parks are among the areas affecting the world’s climate.

About 12,000 two-year-old oak saplings were planted on an area of 3 hectares at the Ugra Berezhichsky forest area. For five years, the young forest will be under the constant control of foresters, guaranteeing the trees priority access to light and moisture. This planting will have a significant impact on greenhouse gases and will ensure that the carbon footprint of economic activity is offset by at least 600 tonnes of CO₂-equivalent over the next 100 years. The restoration of broadleaved forests in Ugra is the Group’s contribution to the conservation of the region’s biodiversity and active support of the existing ecosystem inhabited by the Red Book animals.

Over 28,000 pines were planted in the Smolenskoe Poozerie national park. Seven hectares of the new forest were planted in the abandoned areas of the villages destroyed during the Great Patriotic War and later transferred to the national park’s management. The plantations here are also under the control of foresters and will become a full-grown forest in as little as 7 to 10 years. Poozerie forests are an ornithological area of global importance with a rich bird and animal life. Planting 7 hectares of pine forest can offset the carbon footprint of economic activity by at least 951 tonnes of CO₂-equivalent over the next 100 years after planting.

Interaction with stakeholders

Interaction with the regulatory authorities on sustainable development issues

2-12 2-29

In 2022, Moscow Exchange Group participated in four working groups tackling sustainable development issues:

- the Bank of Russia Working Group on Corporate Governance and Information Disclosure;
- the Bank of Russia Working Group on Carbon Regulation;
- the Interdepartmental Working Group on Development of Investment Activities and Raising Extra-Budgetary Funds for Sustainable Development;
- the Expert Council on Sustainable Development and Green Financing of the Subcommittee for Sustainable Development and Green Financing.

Moscow Exchange Council and user committees

To ensure efficient interaction with trading participants and clients, a special advisory collegial body, the Exchange Council, which is tasked with elaborating strategic proposals for the development of the Russian financial market, and also represents the interests of market participants and the Exchange’s clients, to ensure that their needs are fully reflected when addressing issues related to the organisation and development of financial market infrastructure. The Exchange Council includes management of major market participants, heads of self-regulatory organisations, management companies, investment banks and the Bank of Russia.

The Exchange Council is elected every two years by the Exchange’s Executive Board. The current members of the Exchange Council were approved by the Executive Board in August 2022.

In 2022, ten meetings of the Exchange Council were held to consider the following issues:

- the current situation on the financial markets and the resumption of trading on the Moscow Exchange markets in March 2022;
- plans to organise payments on Eurobonds of Russian issuers;
- depositary receipts on Russian shares;
- the work of the Expert Council for listing;
- the status of the Investor Protection Club;
- settlement in foreign currencies;
- the performance of the Moscow Exchange for certain periods;
- approaches to information disclosure by issuers;
- the project to set up an information and trading terminal;
- the status of asset unblocking process.

In 2022, the Group calculated the Customer Satisfaction Index (CSI) for the second year in a row based on the results of the survey conducted among the market players and customers. About 300 customers of the Group participated in the survey, which composite index reached 8.7 points out of 10. The high index level proves the efficiency of the Group's efforts to improve the quality of interaction with stakeholders.

A working group consisting of Moscow Exchange, the National Settlement Depository, and the National Clearing Centre, together with Magram Market Research, developed the methodology and interviewed respondents. The methodology involved sending online questionnaires to a list of the Group's contacts, after which a satisfaction index was calculated based on the customer service scores received. By ascertaining the level of satisfaction and getting customers to rate the importance of individual service components, the Group can determine priority areas to focus on in further developing customer service. Moscow Exchange Group plans to calculate the CSI on an annual basis.

There are 24 user committees operating under Moscow Exchange and the National Settlement Depository. These committees discuss issues that affect all aspects of the exchange's activities, including regulation of public circulation and issuance of securities, corporate governance, technology, and other matters.

International organisations and initiatives

2-28

Over the years, the Group has cooperated actively with international financial organisations to study global best practices and share experience.

In 2022, Moscow Exchange continued developing actively the cooperation and interaction with foreign exchanges. Apart from the continued cooperation with the Chinese financial institutions in the stock, foreign exchange and precious metals markets, Exchange develops business relations with exchanges of Azerbaijan, Armenia, the Republic of Belarus, Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, and Uzbekistan.

In 2022, the interaction with infrastructure organisations of the Kazakh financial market became one of the key development areas in the CIS countries.

For example, the cooperation was continued as part of the long-term strategic partnership with Kazakhstan Stock Exchange JSC to develop the financial market instruments for a partner stock exchange (currency, money and derivatives markets).

The second key area of interaction with infrastructure organisations of the financial market of the CIS countries was the interaction with Uzbek stock exchanges. For instance, joint seminars with brokers and events to familiarise traders with exchange technology and Russian market development experience were held throughout 2022 at the Uzbek Republican Currency Exchange.

- The Group participates in the UN initiative of Sustainable Stock Exchanges representing a single platform to learn, how exchanges in cooperation with investors, companies (issuers), regulators, politicians, and competent international authorities can improve their sustainability performance and contribute to the development of responsible investments, including funding of UN SDGs.
- Moscow Exchange Group also organised an event as part of the Ring the Bell for Gender Equality international initiative.

Partnership with institutions of higher education

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Moscow Exchange Group collaborates with a number of Russian universities on an ongoing basis. It organises field-specific contests and conferences to develop students' financial market knowledge and skills.

In order to promote the brand in the student audience and improve the awareness of students, the Group participates annually in the career fairs and publishes vacancies in career groups of universities. In 2022, the Group together with the National Research University – Higher School of Economics (HSE University) held a student conference on financial markets.

- Every year, students undergo internships at the Group's companies, with the best interns being offered jobs. In 2022, 29 out of 75 trainees, who completed the internship, were recruited. Moscow Exchange regularly offers paid internships for senior students in three formats: MOEX Start, MOEX Study & Work, MOEX Future Leaders. Students of the Higher School of Economics, the Financial University, and the MEPhI National Research Nuclear University are offered places in practical training and internship programmes under contract.
- The National Settlement Depository and the National Clearing Centre offer paid internships for senior students and graduates of technical and economic universities through programme NSD Perspective.

The Group holds educational lectures for students. In 2022, a series of lectures on financial markets was given to postgraduate students. Group employees also give lectures and hold seminars on financial risk management at the HSE University and St. Petersburg School of Economics and Management.

As part of interaction with the Financial University under the Government of the Russian Federation, the Exchange organised lectures and workshops for senior Bachelor degree and Master degree students. At the workshops the students performed independent transactions on stock markets in a test version of the trading platform. Experience with the multi-purpose terminal will be useful in the careers of future professionals in both financial institutions and non-financial companies. Exchange

management was actively involved in the university events and spoke to the students. In addition, certain managers were engaged in the training process of the financial department as external part-time assistant professors.

Enhancing the professionalism of the investor relations (IR) community

Moscow Exchange operates the MOEX IR-Club and MOEX IR Academy, as platforms for dialogue within the IR community that encourages the exchange of opinions between professionals. It also serves as a discussion club and a centre for the development of professional principles and standards in the field of IR.

In 2022, five meetings were held, where the club members and invited experts discussed current events and shared their experiences. The communication format with the IR community was expanded through digests of interesting professional news.

Project, Three webinars were held within the project of the IR-Academy: "Social aspects in ESG strategies companies", "Why the concept of DEI (diversity, engagement and inclusion) is important for companies? and how companies can integrate the DEI concept into their business processes", "Practical conference based on the results of the jubilee XXV annual report contest of the Moscow Exchange.

As part of MOEX Home Talks, the series of online meetings, the Exchange representatives talk to senior executives from issuing companies and discuss doing business in a changing environment, as well as development plans and new opportunities for the Russian economy and private investors. Five meetings with managers of large issuers were held in 2022.

Plans for 2023

Under Moscow Exchange School, a project for individual investors, the Group plans to train 100,000 new investors through the accredited Investor's Path course, as well as other courses.

SUSTAINABILITY DATA

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GENUINE CORPORATE GOVERNANCE AND BUSINESS ETHICS

ESG indicator	GRI Standards	SASB	Reporting perimeter ¹	Indicator	Unit of measurement	2019	2020	2021	2022
Direct economic value, generated and distributed									
G1	201-1		1	Generated direct economic value: total income (revenue)	RUB million	46,148.9	50,575.1	56,059.0	86,549.5
G1	201-1		1	Distributed direct economic value, total:	RUB million	-44,587.3	-41,875.6	-51,700.3	-39,574.2
G1	201-1		1	Distributed direct economic value: operating expenses ²	RUB million	-7,693.4	-7,530.0	-9,810.2	-10,795.6
G1	201-1		1	Distributed direct economic value: salaries and other payments to employees (including benefits)	RUB million	-7,113.9	-8,459.3	-9,881.7	-11,982.3
G1	201-1		1	Distributed direct economic value: payments to capital providers	RUB million	-20,296.6	-19,883.5	-22,559.2	-3,054.2
G1	201-1		1	Distributed direct economic value: payments to the government	RUB million	-9,459.3	-5,889.6	-9,414.3	-13,628.0
G1	201-1		1	Distributed direct economic value: community investment (charity contributions)	RUB million	-24.1	-113.2	-34.9	-114.1
G1	201-1		1	Difference between generated direct economic value and distributed economic value	RUB million	1,561.6	8,699.5	4,358.7	46,975.3
Corporate governance									
G1			2	Remuneration to the Supervisory Board members	RUB million	126.6	160.1	161.6	185.3
G1			2	Supervisory Board member count	number	12	12	12	12
G1			2	Share of independent directors in the Supervisory Board	%	58	67	67	41.7
G1			2	Attendance by members at meetings of the Supervisory Board	%	98	98	97	92
Anti-corruption and business ethics									
G2	205-3		1	Detected corruption cases	number	0	0	0	0
G2			1	Enquiries from employees about business ethics issues	number	2	7	6	8
G2	2-27		1	Amount of fines received as a result of socio-economic violations	RUB	0	0	0	200
G2		FN-EX-510a.1	1	Amount of fines received as a result of antitrust violations, fraud, insider trading, market manipulation, abuse of power, or other violations of laws applicable to financial institutions	RUB	0	0	0	0

¹ The first perimeter comprises information pertinent to Moscow Exchange, NSD, NCC and NAMEX; the second perimeter comprises information pertinent to Moscow Exchange.

² Operating expenses include depreciation.

ESG indicator	GRI Standards	SASB	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
G2	205-2		2	Employees trained on anti-corruption issues, total	number	725	1,084	1,188	1,300
G2	205-2		2	▪ of which: senior executives	number				3
G2	205-2		2	▪ of which: functional department managers	number				255
G2	205-2		2	▪ of which: specialists	number				1,042
G2	205-2		2	Employees trained on anti-corruption issues, total	%				99.6
G2	205-2		2	▪ of which: senior executives	%				100
G2	205-2		2	▪ of which: functional department managers	%				98.8
G2	205-2		2	▪ of which: specialists	%				99.8
G2	205-2		2	Employees informed of existing anti-corruption policies	%	45	100	100	100
G2	205-1		1	Departments that were assessed on corruption risks	%	–	100	100	100
G2	206-1		1	Lawsuits involving anticompetitive behaviour and antitrust violations, pending or completed during the reporting period	number	0	0	0	0
Supply chain management									
G3			1	Total value of procurements	RUB billion	7.0	4.9	6.9	3.6

RESPECT FOR HUMAN RIGHTS, EQUAL OPPORTUNITIES AND STAFF ENGAGEMENT

ESG indicator	GRI Standards	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
Employment and Efficiency								
R1	2-7	1	Average employee headcount	people	1,680	1,815	1,984	2,206
R1	2-7	1	Average number of male employees	people	924	1,023	1,156	1,278
R1	2-7	1	Average number of female employees	people	756	792	828	928
R1	2-7	1	Total number of employees at year end	people	1,760	1,981	2,199	2,236
R1	2-7	1	Total number of male employees at year end	people	932	1,093	1,246	1,258
R1	2-7	1	Total number of female employees at year end	people	828	888	953	978
R2	2-8	1	Number of employees working on civil law contracts or other forms of contract, except for an employment contract	people	85	36	72	53
R2	2-8	1	Average duration of civil law contracts	months	1.8	2.5	2.0	2.1
R2	2-8	1	Total duration of civil law contracts	months	156.5	88.9	149.4	110.6
R1		1	Wages and other payments to employees (including benefits)	RUB billion	7.1	8.5	9.9	12
R1	401-1	1	New employee hires, total	people	346	484	683	548
R1	401-1	1	New employee hires as a percentage of the workforce	%	20	24	31	25
R1	401-1	1	New male employee hires	people	200	320	435	324
R1	401-1	1	New male employee hires as a percentage of the male workforce	%	21	29	35	26
R1	401-1	1	New female employee hires	people	146	164	248	224
R1	401-1	1	New female employee hires as a percentage of the female workforce	%	18	18	26	23

ESG indicator	GRI Standards	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
R1	401-1	1	New employee hires under 30 years of age	people	147	170	255	188
R1	401-1	1	New employee hires under 30 years of age as a percentage of the workforce under 30	%	56	54	66	51
R1	401-1	1	New employee hires 30 to 50 years of age	people	186	288	405	320
R1	401-1	1	New employee hires 30 to 50 years of age as a percentage of the 30 to 50 years old workforce	%	16	22	27	21
R1	401-1	1	New employee hires over 50 years of age	people	13	26	23	40
R1	401-1	1	New employee hires over 50 years of age	%	4	8	7	11
R1		1	Number of disabled employees hired	people	0	2	0	10
R1		1	Interns	people	37	42	67	75
R1		1	Interns hired upon completion of internship	people	10	12	14	29
R1	401-1	1	Dismissed employees, total	people	265	270	460	503
R1	401-1	1	Dismissed male employees	people	154	163	279	306
R1	401-1	1	Dismissed female employees	people	111	107	181	197
R1	401-1	1	Dismissed employees under 30 years of age	people	78	73	127	139
R1	401-1	1	Dismissed employees 30 to 50 years of age	people	142	155	280	319
R1	401-1	1	Dismissed employees over 50 years of age	people	45	42	53	45
R1	401-1	1	Employee turnover	%	11.1	7.9	18.0	16.2
R1	401-1	1	Turnover of male employees under 30 years of age	%	2.1	1.3	3.5	2.9
R1	401-1	1	Turnover of female employees under 30 years of age	%	1.2	0.6	1.8	1.4
R1	401-1	1	Turnover of male employees 30 to 50 years of age	%	4.0	3.4	7.1	7.2
R1	401-1	1	Turnover of female employees 30 to 50 years of age	%	2.4	1.7	4.2	3.7
R1	401-1	1	Turnover of male employees over 50 years of age	%	0.8	0.4	0.8	0.4
R1	401-1	1	Turnover of female employees over 50 years of age	%	0.6	0.5	0.6	0.6

ESG indicator	GRI Standards	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
R1	401-1	1	Change in employee turnover compared to last year (full-time employees)	p.p.	2.3	−3.2	10.1	−1.8
R1	401-1	1	Employee turnover (as per GRI methodology)	%	15.1	13.6	21.0	22.5
R1	401-1	1	Employee turnover (as per GRI methodology), men	%	16.5	14.9	22.4	24.3
R1	401-1	1	Employee turnover (as per GRI methodology), women	%	13.4	12.0	19.0	20.1
R1	401-1	1	Employee turnover (as per GRI methodology), under 30 years of age	%	29.7	23.0	32.9	37.4
R1	401-1	1	Employee turnover (as per GRI methodology), 30 to 50 years of age	%	11.8	11.6	18.9	21.4
R1	401-1	1	Employee turnover (as per GRI methodology), over 50 years of age	%	15.1	13	16.1	12.1
R1	401-1	1	Change in employee turnover, as per GRI methodology	p.p.	−0.9	−1.5	7.4	1.5
R1		1	Percentage of employees who underwent a satisfaction/engagement review, total	%	−	86.0	85.1	83.6
R1		1	Percentage of engaged employees			85.0	86.2	86.2
R1		1	Percentage of loyal employees			84.0	81.4	84.4
R1		1	Percentage of satisfied employees			87.0	87.9	88.6
R1	2-7	1	Percentage of full-time employees	%	98	98	97	97
R1	2-7	1	Percentage of part-time employees	%	2	2	3	3
R1	2-7	1	Employees with a permanent employment contract, total	people	1,630	1,853	2,077	2,134
R1	2-7	1	Male employees with a permanent employment contract	people	869	1,029	1,188	1,207
R1	2-7	1	Female employees with a permanent employment contract	people	761	824	889	927
R1	2-7	1	Employees with a temporary employment contract, total	people	130	128	122	102
R1	2-7	1	Male employees with a temporary employment contract	people	63	64	58	51
R1	2-7	1	Female employees with a temporary employment contract	people	67	64	64	51
R1	2-7	1	Full-time employees, total	people	1,726	1,939	2,126	2,173

OVERVIEW OF MOSCOW EXCHANGE GROUP'S REPORTING SUITE	2022 SUSTAINABILITY PERFORMANCE HIGHLIGHTS	SUSTAINABILITY DATA	SUSTAINABILITY APPROACHES AND PROCEDURES	APPENDICES
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ESG indicator	GRI Standards	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
R1	2-7	1	Full-time male employees	people	915	1,073	1,213	1,221
R1	2-7	1	Full-time female employees	people	811	866	913	952
R1	2-7	1	Part-time employees, total	people	34	42	73	63
R1	2-7	1	Part-time male employees	people	17	20	33	37
R1	2-7	1	Part-time female employees	people	17	22	40	26
R1	2-7	1	Number of employees whose employment contracts do not guarantee working and paying for a certain number of working hours	people	0	0	0	0
R1	2-8	1	Fulfilment of a significant portion of the Company's activities by workers who are not employees (other employees)		none	none	none	none
R1	405-1	1	Members of the Supervisory Board, total	people	12	12	12	12
R1	405-1	1	Percentage of male members of the Supervisory Board	%	83	83	83	92
R1	405-1	1	Percentage of female members of the Supervisory Board	%	17	17	17	8
R1	405-1	1	Percentage of members of the Supervisory Board under 30 years of age	%	0	0	0	0
R1	405-1	1	Percentage of members of the Supervisory Board 30 to 50 years of age	%	42	42	42	60
R1	405-1	1	Percentage of members of the Supervisory Board over 50 years of age	%	58	58	58	40
R1	405-1	1	Senior executives, total	people	20	14	13	11
R1	405-1	1	Male senior executives	people	13	10	10	9
R1	405-1	1	Female senior executives	people	7	4	3	2
R1	405-1	1	Percentage of male senior executives	%	65	71	77	82
R1	405-1	1	Percentage of female senior executives	%	35	29	23	18
R1	405-1	1	Percentage of senior executives under 30 years of age	%	0	0	0	0

ESG indicator	GRI Standards	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
R1	405-1	1	Percentage of senior executives 30 to 50 years of age	%	70	64	54	64
R1	405-1	1	Percentage of senior executives over 50 years of age	%	30	36	46	36
R1	405-1	1	Functional department managers, total	people	382	408	429	414
R1	405-1	1	Male functional department managers	people	231	254	273	256
R1	405-1	1	Female functional department managers	people	151	154	156	158
R1	405-1	1	Percentage of male functional department managers	%	60	62	64	62
R1	405-1	1	Percentage of female functional department managers	%	40	38	36	38
R1	405-1	1	Percentage of functional department managers under 30 years of age	%	1.8	2.9	2.8	2.0
R1	405-1	1	Percentage of functional department managers 30 to 50 years of age	%	72.8	72.8	76.9	75.0
R1	405-1	1	Percentage of functional department managers over 50 years of age	%	25.4	24.3	20.3	23.0
R1		1	Functional department managers with disabilities	people	0	0	1	1
R1	405-1	1	Specialists, total	people	1,327	1,544	1,742	1,799
R1	405-1	1	Male specialists	people	657	814	948	981
R1	405-1	1	Female specialists	people	670	730	794	818
R1	405-1	1	Percentage of male specialists	%	50	53	54	55
R1	405-1	1	Percentage of female specialists	%	50	47	46	45
R1	405-1	1	Percentage of specialists under 30 years of age	%	19	20	21	20
R1	405-1	1	Percentage of specialists 30 to 50 years of age	%	67	66	66	65
R1	405-1	1	Percentage of specialists over 50 years of age	%	14	14	13	15
R1		1	Specialists with disabilities	people	9	9	8	17
R1	405-1	1	Workers, total	people	31	15	15	12
R1	405-1	1	Percentage of male workers	%	100	100	100	100
R1	405-1	1	Percentage of female workers	%	0	0	0	0
R1	405-1	1	Percentage of workers under 30 years of age	%	0	0	0	0
R1	405-1	1	Percentage of workers 30 to 50 years of age	%	54.8	66.7	66.7	58.0
R1	405-1	1	Percentage of workers over 50 years of age	%	45.2	33.3	33.3	42.0

OVERVIEW OF MOSCOW EXCHANGE GROUP'S REPORTING SUITE	2022 SUSTAINABILITY PERFORMANCE HIGHLIGHTS	SUSTAINABILITY DATA	SUSTAINABILITY APPROACHES AND PROCEDURES	APPENDICES
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ESG indicator	GRI Standards	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
R1	401-3	1	Total number of employees who were entitled to parental leave	people	1,760	1,981	2,199	2,236
R1	401-3	1	▪ of which: men	people	932	1,093	1,246	1,258
R1	401-3	1	▪ of which: women	people	828	888	953	978
R1	401-3	1	Employees who took parental leave, total	people	42	30	29	23
R1	401-3	1	Male employees who took parental leave	people	1	0	1	0
R1	401-3	1	Female employees who took parental leave	people	41	30	28	23
R1	401-3	1	Employees who returned to work after parental leave, total	people	34	26	20	30
R1	401-3	1	▪ of which: men	people	0	0	0	0
R1	401-3	1	▪ of which: women	people	34	26	20	30
R1	401-3	1	Employees who returned to work after parental leave ended who were still employed 12 months after their return to work	people	21	25	14	14
R1	401-3	1	▪ of which: men	people	1	0	0	0
R1	401-3	1	▪ of which: women	people	20	25	14	14
R1	401-3	1	Return to work rate (ratio of the total number of employees who did return to work after parental leave to the total number of employees due to return to work after taking parental leave this year)	rate	–	0.8	0.6	0.8
R1	401-3	1	▪ of which: men	rate	–	0	0	–
R1	401-3	1	▪ of which: women	rate	–	0.8	0.6	0.8
R1	401-3	1	Retention rate (percentage of employees retained in the company after returning to work following a period of parental leave)	rate	0.8	0.7	0.5	0.7
R1	401-3	1	▪ of which: men	rate	–	0	0	–
R1	401-3	1	▪ of which: women	rate	–	0.7	0.5	0.7
R1	2-30	1	Number of complaints received with respect to violations of employees' right to freedom of association and collective bargaining	%	0	0	0	0
R1		1	Percentage of total employees covered by collective bargaining agreements	%	0	0	0	0

ESG indicator	GRI Standards	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
Training and development								
R2	404-1	1	Hours of training, total	hours	48,683	23,993	40,812	20,538
R2	404-1	1	Average hours of training per year per employee (as per GRI)	hours	28	12	19	9
R2	404-1	1	Average hours of training per year per male employee	hours	26	13	20	12
R2	404-1	1	Average hours of training per year per female employee	hours	29	11	17	6
R2	404-1	1	Percentage of employees who completed training, total	%	79	60	43	24
R2	404-1	1	Number of training hours per male senior executive	hours	31	34	84	18
R2	404-1	1	Number of training hours per female senior executive	hours	66	18	50	32
R2	404-1	1	Number of training hours per male functional department manager	hours	53	23	40	20
R2	404-1	1	Number of training hours per female functional department manager	hours	57	26	49	1
R2	404-1	1	Number of training hours per male specialist	hours	18	10	14	10
R2	404-1	1	Number of training hours per female specialist	hours	23	8	10	6
R2	404-1	1	Number of training hours per male worker	hours	2	0	0	0
R2	404-1	1	Number of training hours per female worker	hours	none ¹	none	none	none
R2		2	Percentage of employees of the relevant departments who completed sustainability management training, out of the total number of employees	%	–	–	10	1

¹ These employees are not trained.

ESG indicator	GRI Standards	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
R2	404-3	1	Percentage of employees who underwent a regular performance and career development review, total ¹	%	100	100	100	92
R2	404-3	1	Percentage of male senior executives who underwent a regular performance and career development review	%	100	100	100	100
R2	404-3	1	Percentage of female senior executives who underwent a regular performance and career development review	%	100	100	100	100
R2	404-3	1	Percentage of male functional department managers who underwent a regular performance and career development review	%	100	100	100	98
R2	404-3	1	Percentage of female functional department managers who underwent a regular performance and career development review	%	100	100	100	97
R2	404-3	1	Percentage of male specialists who underwent a regular performance and career development review	%	100	100	100	92
R2	404-3	1	Percentage of female specialists who underwent a regular performance and career development review	%	100	100	100	90
R2	404-3	1	Percentage of employees for whom goals have been set (under a performance appraisal)	%	100	100	100	96
Diversity and equal opportunity								
R3	405-1	1	Percentage of women out of the total number of employees	%	47	45	43	44
R3	405-1	1	Percentage of women on the Supervisory Board	%	25	24	20	21
R3	405-1	1	Percentage of women out of the total number of functional department managers	%	40	37	36	38
R3	405-1	1	Percentage of women out of the total number of senior executives	%	35	28	23	18
R3		1	Percentage of women in managerial positions in profit generating areas of the business (front office)	%	–	31	31	35

¹ Indicator "Percentage of employees who underwent a regular performance and career development review for 2019 – 2021" calculated from those employees who have been assigned a formalised performance appraisal, excluding employees on parental leave, trainees, and dismissed employees until the appraisal is completed.

ESG indicator	GRI Standards	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
R3	405-2	1	Average gender pay gap: all employees	rate	–	1.39	1.33	1.32
R3	405-2	1	Average gender pay gap: functional department managers	rate	1.17	1.16	1.15	1.18
R3	405-2	1	Average gender pay gap: specialists	rate	1.27	1.32	1.27	1.25
R3		1	Employees with disabilities	people	9	9	9	18
R3	406-1	1	Total number of confirmed incidents of discrimination in the reporting period	number	0	0	0	0
R3	202-1	1	Average pay of entry-level specialists and workers, including bonuses: total	RUB	82,500	85,680	94,170	90,162
R3	202-1	1	Average pay of entry-level specialists and workers, including bonuses: men	RUB	82,000	85,260	95,700	98,864
R3	202-1	1	Average pay of entry-level specialists and workers, including bonuses: women	RUB	83,000	88,100	85,700	69,857
R3	202-1	1	Minimum statutory monthly pay in Moscow	RUB	20,185	20,195	20,589	21,371
R3	202-1	1	Ratio of the average pay of entry-level specialists and workers, including bonuses, to the minimum statutory monthly pay in Moscow	rate	4.1	4.2	4.6	4.22
R3	202-1	1	Ratio of the average pay of male entry-level specialists and workers, including bonuses, to the minimum statutory monthly pay in Moscow	rate	4.06	4.2	4.6	4.63
R3	202-1	1	Ratio of the average pay of female entry-level specialists and workers, including bonuses, to the minimum statutory monthly pay in Moscow	rate	4.1	4.4	4.2	3.27

ESG indicator	GRI Standards	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
R3		1	Availability of variable remuneration in the form of shares for employees, other than senior management		yes	yes	yes	yes
Occupational health and safety (OHS), and Employment relations								
R4	403-5	1	Number of employees who completed OHS training	people	374	517	360	384
R4	403-9	1	Number of work-related injuries, total	incidents	0	0	0	0
R4	403-9	1	Number of work-related injuries among employees	incidents	0	0	0	0
R4	403-9	1	Work-related injury rate (ratio of the number of work-related injuries of employees to the total number of hours worked)	rate	0	0	0	0
R4	403-9	1	Number of microinjuries among employees	incidents	–	–	–	0
R4	403-10	1	Cases of work-related illness	number	0	0	0	0
R4	403-10	1	Fatalities because of work-related illness	number	0	0	0	0
R4		1	Rate of absenteeism	rate	0	0	0	0
R4		1	Number of workplaces for which a special assessment of working conditions was carried out	workplaces	103	958	0	648

ENVIRONMENTALLY FRIENDLY AND TRUSTED MARKET INFRASTRUCTURE

ESG indicator	GRI Standards	SASB	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
E3		FN-EX-550a.1 (1)	2	Number of market disruptions	number	1	1	0	1
E3		FN-EX-550a.1 (2)	2	Total downtime of key information systems	hours	0.08	0.7	0.0	1.1
E3			2	Availability of IT systems	%	99.99	99.99	100	99.99
E3			2	Number of operational risk incidents	number	28	31	18	24
E3	418-1		1	Number of privacy incidents and data breaches in the reporting year	number	0	0	0	0
E3	418-1		1	Number of substantiated customer complaints concerning data privacy and information security	number	0	0	0	0
E3	418-1		1	Number of substantiated government complaints concerning data privacy and information security	number	0	0	0	0
E3		FN-EX-550a.2 (1)	1	Number of data breaches	number	0	0	0	0
E3		FN-EX-550a.2 (2)	1	Percentage of data breaches involving personally identifiable information	%	0	0	0	0
E3		FN-EX-550a.2 (3)	1	Number of clients affected	number	0	0	0	0
E3			1	Financial losses incurred because of malfunctions of information security and cybersecurity systems	RUB	–	0	0	0
E3		FN-EX-410a.1.	1	Average duration of trading pauses related to volatility (extreme price change)	minutes	30	30	–	30
E3		FN-EX-410a.1 ¹	1	Number of trading pauses related to volatility (extreme price change)	number	1	2	0	3,164
E3		FN-EX-410a.2	1	Share of trades generated by automatic trading systems including algorithmic or high-frequency trading systems in the Equity Market	%	52.0	51.4	55.3	49.1
E3		FN-EX-410a.2	1	Share of trades generated by automatic trading systems including algorithmic or high-frequency trading systems in the FX Market	%	70.7	72.9	72.1	80
E3		FN-EX-410a.2	1	Share of trades made by automatic trading systems including algorithmic or high-frequency trading systems in the Derivatives Market	%	59.7	61.9	66	63.3

¹ On 24 February 2022, trading pauses for individual securities lasted more than 30 minutes due to the overlap of discrete index auctions with a discrete security auction.

RESOURCE EFFICIENCY AND ENVIRONMENTAL IMPACT

ESG indicator	GRI Standards	SASB	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
E3	302-1		1	Electricity consumption, total	kWh	16,139,892	15,278,009	15,571,967	15,422,157
E3	302-1		1	Electricity consumption, total	TJ	58.1	55.0	56.6	55.5
E3	302-1		1	Electricity consumption, data centres	kWh	5,094,206	5,531,978	5,718,422	5,650,934
E3	302-1		1	Electricity consumption, data centres	TJ	18.3	19.9	20.6	20.3
E3	302-1		1	Heat consumption	Gcal	4,554	3,955	5,111	4,650.9
E3	302-1		1	Heat consumption, total	TJ	19.2	16.7	21.6	19.5
E3	302-1		1	Petrol and diesel fuel consumption, total	thousand litres	77.9	52.2	58.4	58.5
E3	302-1		1	Diesel fuel consumption	thousand litres	7.2	5.9	8.8	6.1
E3	302-1		1	Petrol consumption	thousand litres	70.7	46.3	49.6	52.4
E3	302-1	1		Petrol and diesel fuel consumption, total	TJ	2.56	1.7	1.9	1.9
E3	302-1		1	Diesel fuel consumption	TJ	0.26	0.2	0.3	0.2
E3	302-1		1	Petrol consumption	TJ	2.3	1.5	1.6	1.7
E3	302-1	1		Energy consumption, total	TJ	79.9	73.4	80.1	76.9
E3	302-3		1	Energy intensity per revenue	GJ/RUB million	1.85	1.51	1.46	0.92
E3	302-3		1	Electricity intensity per revenue, data centres	GJ/RUB million	0.42	0.41	0.38	0.24
E3	302-3		1	Energy intensity per employee	GJ/person	47.56	40.44	40.37	34.87
E3			1	GHG emissions					
E3	305-1		1	Direct GHG emissions (based on fuel consumption and coefficients pursuant to Order of the Ministry of Natural Resources and Environment of the Russian Federation No. 15-r dated 16 April 2015), Scope 1	t CO ₂	233.7	119.9	132.9	134.8
E3	305-1		1	Direct GHG emissions (based on vehicle passport characteristics), Scope 1	t CO ₂	96.6	72.8	63.6	60.1
E3	305-2		1	Indirect GHG emissions from purchased electricity (location-based), Scope 2 ¹	t CO ₂	3,966.30	3,626.5	3,838.2	3,907.4
E3	305-2		1	Indirect GHG emissions from electricity consumption (market-based), Scope 2 ²	t CO ₂	–	–	2,939.6	1,077.8
E3	305-2		1	Indirect CO ₂ emissions from purchased heat (location-based), Scope 2	t CO ₂	1,188.9	1,029.2	1,331.9	1,208.2
E3	305-2		1	Gross indirect CO₂ emissions from purchased electricity and heat, Scope 2	t CO₂	5,155.1	4,656.7	4,271.6	2,286.0

¹ Location-based calculation method considers the emission factor from the consumed electricity in the networks in the region.

² Market-based calculation method considers the emissions of suppliers of electricity, including suppliers of energy from RES.

ESG indicator	GRI Standards	SASB	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
E3	305-3		1	Indirect GHG emissions, business trips by air, Scope 3	t CO ₂	264.5	30.6	32.1	23.7
E3	305-3		1	Indirect GHG emissions, business trips by rail, Scope 3	t CO ₂	3	0	1.25	1.13
E3	305-3		1	Indirect GHG emissions from transmission of purchased electricity, Scope 3	t CO ₂	380.2	381.4	373.6	380.0
E3	305-3		1	Indirect CO ₂ emissions from transmission of purchased heat, Scope 3	t CO ₂	108.8	96.3	149.9	135.6
E3	305-4		1	GHG emission intensity per revenue, Scope 1 and 2 ¹	t CO ₂ /RUB million	0.12	0.10	0.08	0.03
E3	305-4		1	GHG emission intensity per employee, Scope 1 and 2	t CO ₂ /person	3.13	2.61	2.21	1.06
E3			1	Gross GHG emissions (Scope 1, 2, 3)	t CO ₂	6,145.6	5,284.5	4,961.3	2,961.2
E3			1	Water consumption² and wastewater disposal					
E3	303-3		1	Water withdrawal, total	thousand m ³	25.2	22.2	24.3	25.4
E3	303-5	1		Water consumption, total	thousand m³	0	0	0	0
E3	303-3		1	Water withdrawal per revenue	m ³ /RUB million	0.6	0.5	0.4	0.3
E3	303-3		1	Water withdrawal per employee ³	m ³ /person	15.0	12.2	12.2	11.5
E3	303-4		1	Water discharge ⁴	thousand m ³	28.2	25	27.2	28.5
E3	305-7		1	Air emissions					
E3	305-7		1	Nitrogen dioxide (nitrogen (IV) oxide)	t				0.01626
E3	305-7		1	Nitrogen (II) oxide (nitrogen oxide)	t				0.002642
E3	305-7		1	Carbon (soot)	t				0.000133
E3	305-7		1	Sulfur dioxide (sulphurous anhydride)	t				0.002864
E3	305-7		1	Dihydrosulfide (hydrogen sulfide)	t				0.0000002
E3	305-7		1	Carbon oxide	t				0.102388
E3	305-7		1	Benzpyrene (3,4-benzpyrene)	t				1.62E-08
E3	305-7		1	Acetaldehyde	t				0.001053
E3	305-7		1	Formaldehyde	t				0.000249
E3	305-7		1	Ethanoic acid (acetic acid)	t				0.001053
E3	305-7		1	Gasoline (petroleum, low sulfur) (in terms of carbon)	t				0.008873
E3	305-7		1	Kerosene	t				0.004936
E3	305-7		1	Alkanes C12–C19 (saturated hydrocarbons C12–C19)	t				0.000072
E3	305-7		1	Paper dust	t				0.005265
E3	305-7		1	Air emissions, total	t				0.145788
E3	305-7		1	▪ Including solid	t				0.0053980
E3	305-7		1	▪ Including gaseous and liquid	t				0.1403902
E3	306-3		1	Waste management					
E3	306-3		1	Waste generated, total	t	243.2	243.7	297.6	235.733

¹ Calculation of GHG emission intensity considers indirect GHG emissions from electricity consumption (market-based).

² Moscow Exchange Group consumes and intakes water only from municipal networks and doesn't operate in regions affected by water security. The Group receives only fresh water. Fresh water means water with a total concentration of dissolved solids of no more than 1,000 mg.

³ The average number of employees was used in this calculation.

⁴ Wastewater disposal exceeds water withdrawal, as the calculation also considers water discharged through the storm drains of Moscow Exchange office buildings. Water is discharged only to municipal sources. Water means only fresh water.

ESG indicator	GRI Standards	SASB	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
E3	306-3		1	Waste generated, hazard class I	t	0.3	0.3	0.38	0
E3	306-3		1	Waste generated, hazard class II	t	0.2	2.6	1.3	1.7
E3	306-3		1	Waste generated, hazard class III	t	0.1	0.4	0.12	0.126
E3	306-3		1	Waste generated, hazard class IV	t	196.8	207.8	266.8	202.1
E3	306-3		1	Waste generated, hazard class V	t	45.8	32.6	29.0	31.8
E3	306-3		1	Waste generation intensity per revenue	t/RUB million	0.006	0.005	0.005	0.003
E3	306-3		1	Waste generation intensity per employee	t/person	0.14	0.13	0.15	0.11
E3			1	Waste directed to processing ¹	t	7.4	3.0	5.8	174.9
E3			1	Waste directed to disposal	t	20.9	8.1	4.0	4.97
E3	306-5		1	Waste sent for detoxification and recycling	t	3.6	5.5	4.8	8.15
E3	306-5		1	Waste sent for storage	t	0	0	0	0
E3	306-5		1	Waste sent for burial	t	216.9	227.1	283.0	47.7
E3			1	Paper procured	thousand packages	15.8	6.0	5.6	5.8
E3			1	Paper waste generated	t	23.2	11.2	21.9	13.9
E3			1	Environmental expenditures and investments, total	RUB thousand	4,365.3	3,127.6	4,629.6	781.6
E3			1	Expenditures and investments for prevention of air pollution and climate change	RUB thousand	1.1	0.0	898.5	0.0
E3			1	Expenditures and investments for collection and treatment of wastewater	RUB thousand	2,765.0	1,692.2	1,973.3	0.0
E3			1	Expenditures and investments for waste management	RUB thousand	1,487.14	773.96	1,296.8	256.60
E3			1	Expenditures and investments for other areas of environmental protection	RUB thousand	166	200	477	525
E3			1	Non-compliance with environmental laws and regulations	cases	0	0	0	0

¹ Processing means release of valuable components, including release of energy.

ADVANCED PRACTICES OF RESPONSIBLE INVESTING

ESG indicator	GRI Standards	SASB	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
A1			2	Market capitalisation (at year end)	RUB billion	245.5	362.5	348.0	215.2
A1			1	Operating income	RUB billion	43.2	48.6	54.9	83.5
A1			1	Dividend per share	RUB	7.70	7.93	9.45	–
Market dynamics									
A2			2	Trading volume on all markets	RUB trillion	798.3	947.2	1,009.6	1,055.7
A2		FN-EX-000.B	2	Average daily trading volume on all markets	RUB billion	3,167.7	3,788.7	3,959.3	4,156.1
A2		FN-EX-000.A	2	Average daily number of transactions on all markets	thousand	1,517.0	3,094.1	4,281.6	4,136.4
A2			2	Trading volume on the Equity Market	RUB trillion	12.4	23.9	30.0	17.6
A2		FN-EX-000.B	2	Average daily trading volume on the Equity Market	RUB billion	112.0	95.6	117.6	69.5
A2		FN-EX-000.A	2	Average daily number of transactions on the Equity Market	thousand	514.2	1,293.5	2,141.4	2,073.7
A2			2	Trading volume on the Derivatives Market	RUB trillion	82.4	129.9	158.0	77.3
A2		FN-EX-000.B	2	Average daily trading volume on the Derivatives Market	RUB billion	326.9	519.5	619.6	305.7
A2		FN-EX-000.A	2	Average daily number of transactions on the Derivatives Market	thousand	898.3	1,488.0	1,536.0	1,385.3
A2			2	Trading volume on the Bond Market	RUB trillion	28.2	30.6	22.4	19.6
A2		FN-EX-000.B	2	Average daily trading volume on the Bond Market	RUB billion	112.0	122.5	88.0	77.6
A2		FN-EX-000.A	2	Average daily number of transactions on the Bond Market	thousand	21.1	46.5	62.9	76.6
A2			2	Trading volume on the FX Market	RUB trillion	308.3	328.9	319.8	263.3
A2		FN-EX-000.B	2	Average daily trading volume on the FX Market	RUB billion	1,223.3	1,315.8	1,254.1	1,040.7
A2		FN-EX-000.A	2	Average daily number of transactions on the FX Market	thousand	72.3	232.5	445.5	434.7
A2			2	Trading volume on the Money Market (excluding CMS repo)	RUB trillion	346.3	426.8	474.0	668.4
A2		FN-EX-000.B	2	Average daily trading volume on the Money Market	RUB billion	1,374.4	1,707.1	1,859.0	2,642.0
A2		FN-EX-000.A	2	Average daily number of transactions on the Money Market	thousand	11.1	33.6	95.8	166.2
A2			2	Trading volume on the Commodity Market	RUB billion	492.6	77.9	223.8	193.6
A2		FN-EX-000.B	2	Average daily trading volume on the Commodity Market	RUB billion	2.0	0.3	0.9	0.8
A2		FN-EX-000.A	2	Average daily number of transactions on the Commodity Market	thousand	0.03	0.04	0.13	3.56
A2			2	Share of international investors in the total trading volume on the Equity Market ¹	%	49	46	48	not indicative

¹ Share of international investors for 2022 reflects the activity of international investors only for the first two months of the year, which is not indicative of the results of the full year.

ESG indicator	GRI Standards	SASB	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
A2			2	Share of international investors in the total trading volume on the Derivatives Market	%	49	49	48	not indicative
A2			2	Share of international investors in the total trading volume on the Bond Market	%	13	16	13	not indicative
A2			2	Share of international investors in the total trading volume on the FX Market	%	12	18	16	not indicative
A2			2	Share of international investors in the total trading volume on the Money Market	%	13	11	9	not indicative
A2			2	Corporate bonds placement volume	RUB trillion	3.2	4.0	3.3	2.7
A2			2	Corporate IPO/SPO volume	RUB billion	455.4	260.4	513.0	3.1
Sustainable financial instruments									
A3			2	SME bond offering volumes in the Growth sector	RUB billion	3.1	6.4	7.9	5.6
A3			2	Number of SME issuers in the Growth sector	number	15	22	28	33
A3			2	Secondary trading volumes in the IIM	RUB billion	58	280	322	225
A3			2	Number of securities in the IIM	number	15	24	28	30
A3			2	Capital raised in the IIM	RUB billion / USD million	–	17.5	12.5/500	15.6
A1			2	Primary offering volumes in the Sustainability sector	RUB billion	1.9	11.5	169.4	106.2
A1			2	Number of bond issues in the Sustainability sector	number	6	13	22	27
A2			2	Number of ESG indices	number	2	2	5	5
A2			2	Number of ESG ETFs	number	–	2	6	6

TRUSTED RELATIONS WITH LOCAL COMMUNITIES

ESG indicator	GRI Standards	SASB	Reporting perimeter	Indicator	Unit of measurement	2019	2020	2021	2022
Engagement and training									
T1			1	Number of unique individual customers	million people	3.9	8.8	16.8	22.9
T1			1	Number of students participating in Moscow Exchange School for individual investor	thousand people	>74	>80	>164	>67
T1			1	Number of people who took part in financial literacy improvement activities	thousand people	>90	>100	>100	>100
T1			2	Number of participants in the student conference MOEX Progress: Development of the Russian Financial Market	people	30	35	35	37
T1			1	Number of employees who took part in financial literacy improvement activities organised by Moscow Exchange	people	–	–	17	13
Charity									
T2	203-1		1	Funds allocated for charity projects, total	RUB million	24.2	113.2	34.9	114.05
T2	203-1		1	Science, education and improvement of the financial literacy of the public	RUB million	10.4	9.5	19.1	5.5
T2	203-1		1	Support for veterans	RUB million	4.2	5.3	3.2	3.15
T2	203-1		1	Healthcare, rehabilitation, and care for people with disabilities or COVID-19	RUB million	8.4	97.9	10.5	104.9
T2	203-1		1	Other	RUB million	1.2	0.7	2.1	0.5
T2	203-1		1	Number of people who received aid from charity programmes, total	people	–	1,081,395	3,559	2,658
T2	203-1		1	Science, education and improvement of the financial literacy of the public	people	–	78	15	21
T2	203-1		1	Support for World War II veterans	people	–	62	43	35
T2	203-1		1	Healthcare, rehabilitation, and care for people with disabilities or COVID-19	people	–	1,081,255	2,470	2,512
T2	203-1		1	Other	people	–	–	1,031	90
Sponsorship									
T2	203-1		1	Funds allocated for sponsorship, total	RUB million	95.0	47.5	57.6	75.6
T2	203-1		1	Community engagement	RUB million	86.0	17.4	21.0	44.1
T2	203-1		1	Education and science	RUB million	0.9	22.6	28.5	17.0
T2	203-1		1	Sports and healthy lifestyle	RUB million	8.1	7.5	8.1	11.5
T2	203-1		1	Biodiversity	RUB million				3.0
Donations by the organisation for political purposes									
T2	415-1		1	Funds allocated for political purposes	RUB million	0	0	0	0

SUSTAINABILITY

APPROACHES

AND PROCEDURES

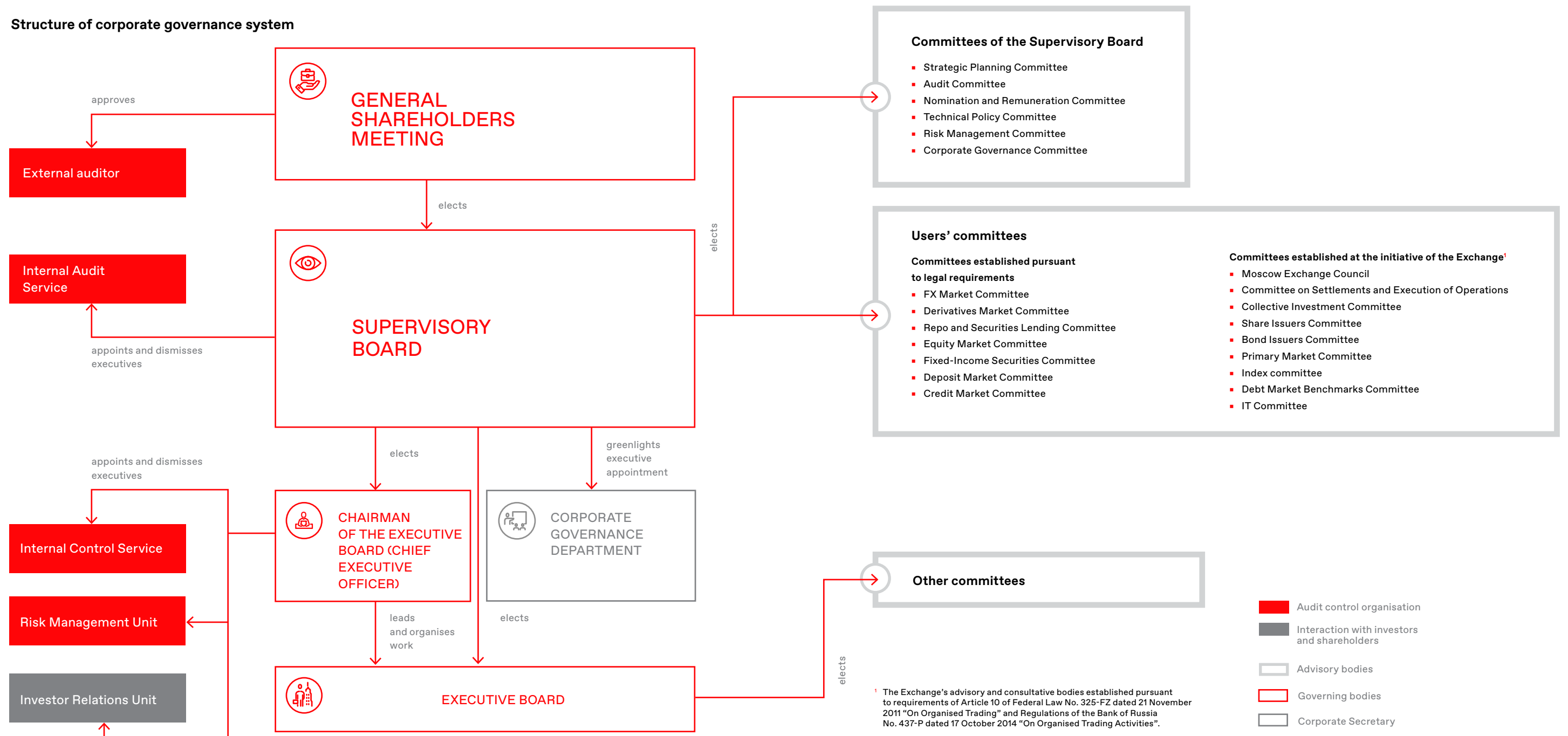
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MOEX GROUP'S FOCUS AREAS: 'GREAT'

G | GENUINE CORPORATE GOVERNANCE AND BUSINESS ETHICS

2-9 3-3

Structure of corporate governance system



Corporate governance system

Moscow Exchange Group's corporate governance system is based on Russian statutory rules and recommendations issued by the Bank of Russia, as well as on international best practices and standards. To improve the quality and effectiveness of corporate governance, the system is constantly being improved to align with the requirements of regulatory bodies, the opinions of shareholders and investors, and the Group's development strategy.

The corporate governance system of Moscow Exchange Group is comprised of the following governing, auxiliary, and supervisory bodies:

- The General Shareholders' Meeting is the supreme governing body.
- The Supervisory Board handles general and strategic management of the Moscow Exchange's activities.
- The committees of the Supervisory Board have an advisory role. Their responsibilities include preliminary consideration and the formulation of recommendations to help the Supervisory Board make decisions on crucial issues.
- The Chairman of the Executive Board and the Executive Board itself are the executive governing bodies. They govern day-to-day activities at the Moscow Exchange.
- The Internal Control and Internal Audit services oversee the effectiveness of risk management and corporate governance practices and compliance with legal requirements, corporate policies, and business processes, and also perform other functions. An independent external auditor reviews and confirms the Group's financial reports.
- The user committees are advisory bodies to Moscow Exchange Group.
- The Corporate Governance Department and the Corporate Secretary coordinate the Exchange's actions to protect shareholders' rights and interests.

Moscow Exchange Group operates according to its Corporate Governance Code. It sets out the core principles and objectives of the corporate governance system, including the principles by which the corporation is governed, which must be followed by the companies of the Group. This is a top-level approach to management approved by Moscow Exchange and then integrated at all the companies

of the Group. The NCC and NSD strive to implement all requirements relevant to Moscow Exchange in their activities.

Key documents:

- [Federal Law No. 208-FZ dated 26 December 1995 On Joint-Stock Companies](#)
- [Federal Law No. 325-FZ dated 21 November 2011 On Organised Trading](#)
- [Bank of Russia Corporate Governance Code](#)
- [Listing Rules of the Moscow Exchange](#)
- [G20/OECD Corporate Governance Principles](#)
- [Internal policies, regulations and other bylaws, including the following:](#)
 - [Charter of Moscow Exchange MICEX-RTS PJSC](#)
 - Regulation on the Identification and Prevention of Conflicts of Interest by Moscow Exchange MICEX-RTS PJSC When Acting as a Trading Organiser and Financial Platform Operator
 - Succession Policy for Members of the Supervisory Board of Moscow Exchange MICEX-RTS PJSC
 - Regulation on the Stock-Based Long-Term Incentive Programme for Key Experts of Moscow Exchange MICEX-RTS PJSC

Governing bodies

General Shareholders Meeting

The General Shareholders' Meeting acts in accordance with Russian legislation and the Charter of Moscow Exchange.

Supervisory Board

The Supervisory Board is the main governing body of Moscow Exchange, acting in accordance with the Charter and the Regulation on the Supervisory Board of Moscow Exchange approved by the General Shareholders' Meeting. The committees under the Supervisory Board consider issues related to sustainability in accordance with their scopes of authority.

Supervisory Board members are elected by the General Shareholders' Meeting to sit on the Board until the next Annual General Shareholders' Meeting. The members of the Supervisory Board are elected by cumulative voting.

2-12 2-14

The competence of the Supervisory Board is defined in the Charter and is delimited from the competence of Moscow Exchange's executive bodies, which manage its day-to-day activities.

In particular, the Supervisory Board:

- defines the vision, mission, and strategy of Moscow Exchange,
- is responsible for the strategic management of the Exchange and its long-term sustainable development, and
- establishes the strategic goals and key performance indicators of the Exchange.

The Supervisory Board also adopts most internal policies.

Internal and external evaluation

2-18 3-3

In accordance with the recommendations of the Bank of Russia's Corporate Governance Code and best international practices, the Supervisory Board of Moscow Exchange self-assesses the effectiveness of its activities annually. In addition, an external evaluation involving an independent consultant is carried out once every three years. In 2022, the external evaluation was carried out by Ward Howell, an independent consultant selected by the Supervisory Board following the consideration of several applications.

Remuneration of Supervisory Board members

2-19 2-20

The current system for the remuneration of Supervisory Board members is set by the Policy for Remuneration and Reimbursement of Expenses (Compensations) (the 'Policy') and by the latest version of the Regulation on Remuneration and Compensation (the 'Regulation'), most recently approved by the Annual General Meeting of Shareholders in 2022.

The Nomination and Remuneration Committee takes active part in the improvement of the system of remuneration for Supervisory Board members, taking into account best practices in corporate governance and the experience of other public companies and international exchanges. The Policy and the Regulation apply only to members of the Supervisory Board of Moscow Exchange.

According to the Policy, the remuneration paid to Supervisory Board members shall be sufficient to attract, retain and properly motivate individuals with the skills and qualifications necessary to work effectively on the Supervisory Board.

The Nomination and Remuneration Committee provides recommendations on the remuneration of Supervisory Board members based on an expert assessment of the remuneration paid by Russian companies with similar capitalisations and by competitors of the Exchange.

The Policy and Regulation govern all types of payments, benefits, and privileges provided to Supervisory Board members and provide for no other forms of short-term or long-term incentives for Supervisory Board members.

To ensure the independence of decision-making, the remuneration of Supervisory Board members is not linked to the performance of the Exchange or to the value of shares on the Exchange and does not include stock option programmes. Supervisory Board members enjoy no pension contributions, insurance programmes (apart from liability insurance for Supervisory Board members and the conventional insurance associated with travelling to perform duties as a director or to participate in Supervisory Board activities), investment programmes, or other benefits or privileges unless these are specified in the Policy or Regulation.

The Exchange does not provide loans to Supervisory Board members and does not enter into civil contracts with them for the provision of services to the Exchange, including on non-market terms.

Remuneration for performing the duties of a Supervisory Board member shall not be paid to government officials, employees of the Bank of Russia, or employees or managers of the Exchange or its subsidiaries.

Remuneration of directors for performing the duties of Supervisory Board members comprises basic and supplementary components.

The level of basic remuneration of a member of the Supervisory Board depends on whether the member is independent or not, and:

- for an independent member of the Supervisory Board, amounts to RUB 9 million;
- for a non-independent member of the Supervisory Board, amounts to RUB 6.5 million.

The following differentiated supplementary remuneration is paid to Supervisory Board members for the performance of the additional duties requiring extra time and effort of the Chairman of the Supervisory Board, Deputy Chairman of the Supervisory Board, Chairman of a Supervisory Board Committee, or member of the Supervisory Board Committee:

- for the Chairman of the Supervisory Board, RUB 11 million;
- for the Deputy Chairman of the Supervisory Board, RUB 4 million;
- for the Chairman of the Supervisory Board Committee, RUB 3.75 million;
- for a member of the Supervisory Board Committee, RUB 1.5 million.

To ensure that the remuneration of Supervisory Board members corresponds to changing market demands between cycles of review of the remuneration level, the Regulation provides for the adjustment of the remuneration of Supervisory Board members in line with the consumer price index at the end of the year in which the corresponding composition of the Supervisory Board was elected and accrued starting from 1 January 2022.

The basic and additional remuneration of a Supervisory Board member may be reduced by 50% if the Supervisory Board member has attended fewer than 75% of the meetings of the Supervisory Board or committees in person, respectively. If a member of the Supervisory Board has taken part in 1/3 or fewer of the total number of meetings of the Supervisory Board or its committees or in ¼ or fewer of in-person meetings of the Supervisory Board or its committees, the corresponding part of the remuneration is not paid.

In addition to remuneration for work on the Supervisory Board and Supervisory Board Committees, members of the Supervisory Board

are reimbursed for travel expenses relating to their participation in in-person meetings of the Supervisory Board or its Committees, General Meetings of Shareholders, as well as events attended while performing the duties of a Supervisory Board member.

As per the current legislation of the Russian Federation, the ‘say on pay’ concept does not apply.

Executive Board

The Executive Board manages the day-to-day operations of Moscow Exchange. The chairman of the Executive Board acts on behalf of Moscow Exchange without the need for a power of attorney. He or she represents its interests, issues orders, gives instructions which are mandatory for all Moscow Exchange employees, and delegates certain powers.

Remuneration of Moscow Exchange executives

2-19 2-20

The system for the remuneration of Moscow Exchange executives is regulated by the Policy on Remuneration and Compensation of Expenses of Executive Body Members. The policy sets out the principles of and approaches to remuneration, and it establishes the procedure for determining the amount of remuneration and the types of payments, benefits, and perks granted to the members of executive bodies. The remuneration consists of fixed and variable components. The variable component accounts for a significant share of annual pay. There are plans to review and implement sustainability KPIs for Executive Board members. Consultants are not involved in determining remuneration.

The total amount of remuneration paid to Executive Board members is assessed by the Nomination and Remuneration Committee to be in accordance with the level of remuneration at comparable companies, based on research purchased from leading consulting companies. Members of Moscow Exchange’s executive bodies are not paid remuneration for their work on the governing bodies of other companies of the Group.

Preventing conflicts of interest

2-15 FN-EX-510a.2

The Policy on Management of Conflicts of Interest and Corporate Disputes has been adopted to prevent conflicts of interest among the members of the governing bodies. The key principles of this policy include:

- a requirement the members of the Supervisory Board, members of the Executive Board, and the Chairman of the Executive Board notify Moscow Exchange of conflicts of interest;
- priority of the interests of Moscow Exchange and its shareholders over the personal interests of the members of Moscow Exchange’s governing bodies;
- contribution of the Supervisory Board to the prevention, identification, and settlement of corporate conflicts;
- priority participation of independent directors in preventing corporate disputes and the performance of significant corporate actions by Moscow Exchange.

A list of affiliated persons is disclosed on the Moscow Exchange website to inform shareholders and other interested parties. See the corresponding report for information on [interested party transactions](#) made by Moscow Exchange in the reporting year.

Sustainability management system

2-12 2-13 2-14

Powers related to sustainability are distributed among the Supervisory Board, the Executive Board, and the Chairman of the Executive Board. This distribution is established in the [Charter of Moscow Exchange MICEX-RTS PJSC](#).

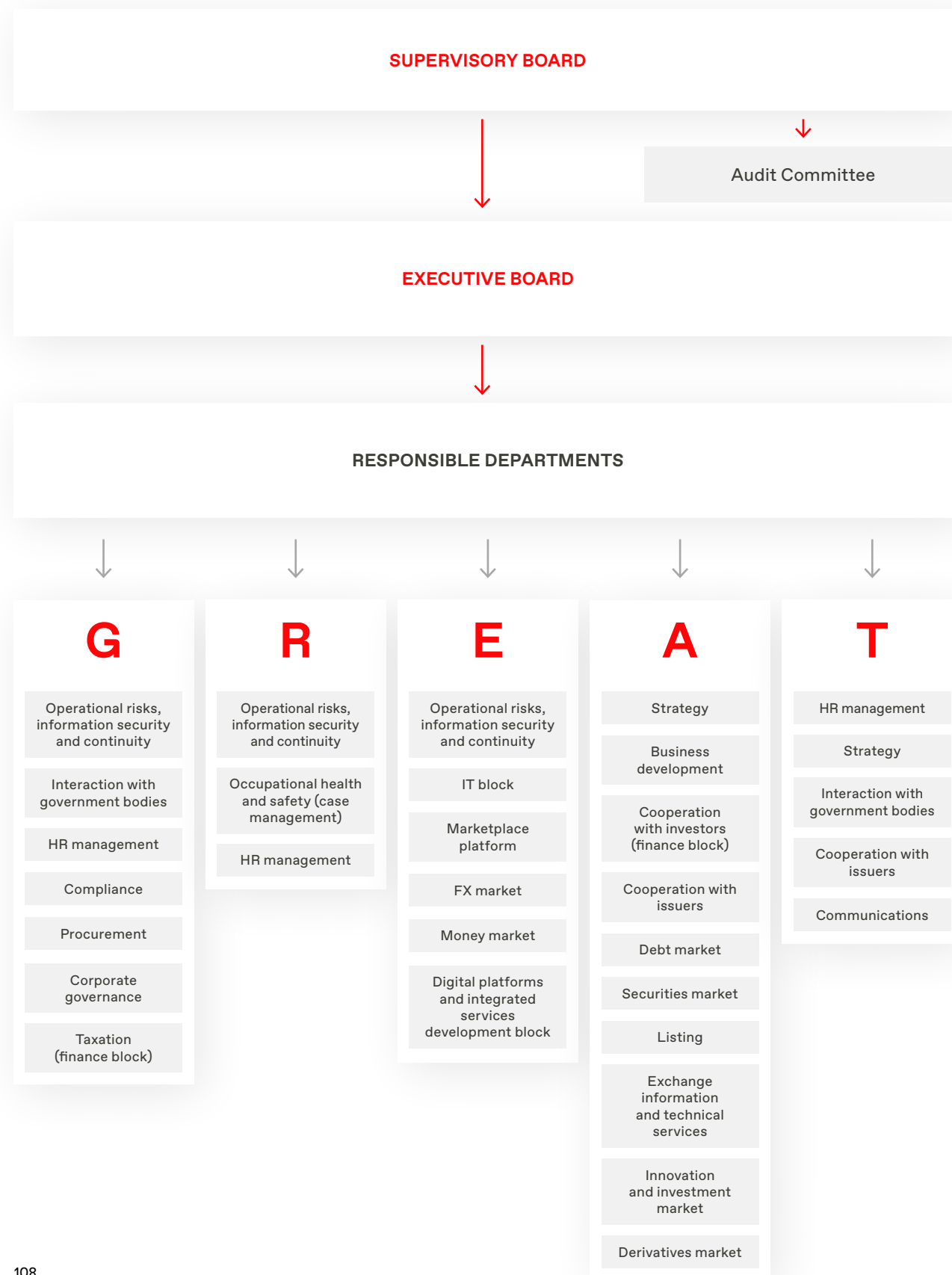
In accordance with the Charter, the Executive Board approves sustainability reports.

The Executive Board shapes Moscow Exchange’s overall sustainability agenda and is responsible for operational decisions in this area. In 2021, the Executive Board decided to form the Sustainable Development Goals Working Group (SDGWG). The body was created under the sustainability roadmap, and its functions include the development of goals on economic, environmental, and social aspects. The body convened twice in 2022 and considered the issues of updating the Roadmap for Sustainable Development for 2022 and the targets of the Environmental Policy. The Chairman of the Executive Board manages sustainability activities and may delegate their management to operational subdivisions. The management of the sustainability agenda at the level of operational subdivisions is shown in the diagram.

The Chairman of the Executive Board reports to the Supervisory Board on a quarterly basis on the status and performance of tasks in the following sustainability areas:

- Information security
- Sustainable technological development
- Risk management
- Business ethics and compliance
- Market access and customer relations
- Development of sustainable exchange financing
- Growth Sector and Innovation and Investment Market Sector
- Employee engagement and performance
- Informing issuers about trends, standards and practices in sustainability
- Financial literacy improvement initiatives

Management of the sustainable development agenda at the departmental level is presented in the diagram.



The Chairman of the Supervisory Board and the independent directors are regularly invited to speak at roundtables and conferences which discuss sustainability issues. There is also interaction with government authorities on relevant issues. The chairman of the Supervisory Board may receive enquiries and requests from stakeholders through the feedback form available on the corporate website, and there are also informal channels for interacting with stakeholders. The members of the Supervisory Board are open to dialogue with all stakeholders, including through informal channels of communication, to receive and process enquiries and requests and submit them to management.

Business ethics

Maintaining and developing a culture of trust and responsibility is a key priority of Moscow Exchange Group's updated strategy. The Group upholds high standards of corporate business conduct and values its reputation. In particular, Moscow Exchange adheres to the following principles:

- zero tolerance principle (aversion to corruption in all forms and manifestations)
- employee engagement principle
- principle of proportionality of anti-corruption procedures to corruption risk
- principle of periodic risk assessment
- principle of mandatory counterparty inspection
- openness principle
- principle of monitoring the efficiency of procedures and their implementation
- principle of accountability and inevitability of punishment
- conflict of interest prevention principle

Key documents:

- [Policy on Preventing Corruption-Related Offenses of Moscow Exchange](#)
- [Code of Professional Ethics](#)
- [Code of Ethics of NSD NCO JSC](#)
- [Code of Business Ethics of NCC NCO JSC](#)
- [Policy on Preventing Corruption-Related Offenses at NCC NCO JSC](#)
- [Procedure for Preventing Conflicts of Interest at NCC NCO JSC](#)
- [Moscow Exchange Information Policy](#)
- NCC NCO JSC Information Policy
- Rules of Internal Control of NCC NCO JSC to Combat the Legalisation (Laundering) of the Proceeds of Crime, the Financing of Terrorism, and the Financing of the Proliferation of Weapons of Mass Destruction

- Regulation on the Contractual Activities of NCC NCO JSC
- [Information on efforts by Moscow Exchange Group counterparties to prevent money laundering and financing of terrorism](#)
- [Moscow Exchange's Know Your Customer/Counterparty Policy](#)
- [Conflict of Interest and Corporate Conflict Management Policy](#)

Responsible bodies:

- Each structural unit of Moscow Exchange is responsible for identifying and assessing risks in its own processes, including corruption-related risks
- Internal Control and Compliance Department
- Audit Committee of the Supervisory Board

2-23

Key principles of the Moscow Exchange Code of Professional Ethics:

- respect for staff and equal opportunity
- respect for staff civil rights, including their right to freedom of speech
- zero tolerance of corruption
- prevention of conflicts of interest
- combating money laundering and the financing of terrorism
- countering the use of inside information
- protection of Moscow Exchange's assets, including intellectual property rights
- protection of shareholders' interests
- non-disclosure of confidential information and protection of intellectual property rights
- maintenance of trust-based relationships with customers, partners, and government authorities
- neutral stance towards political and religious activities (the Group's employees are, however, welcome to engage in such activities at their own expense and as private individuals)
- corporate social responsibility and commitment to sustainability

The Code of Professional Ethics sets out the values that are fundamental to decision-making in the course of Moscow Exchange's activities:

- openness and decency
- continual development and openness to change
- partnership with customers
- responsibility for the future of the Company

Anti-corruption

The Group's companies adhere to the principle of aversion to corruption in all forms and manifestations. The Group's anti-corruption management approaches are defined in top-level documents and local regulations, and they are also specifically implemented in key company regulations (such as procurement regulations).

Key principles of the anti-corruption policy:

- Moscow Exchange prohibits the offering or acceptance of any items of value (including gifts and incentive payments) in soliciting assistance to solve any issues.
- Moscow Exchange prohibits transactions with third parties that would act on behalf of or in the interests of Moscow Exchange.
- Moscow Exchange has corruption risk controls embedded in all aspects of its activities.
- Moscow Exchange incorporates anti-corruption provisions (clauses) into contracts and vets all counterparties.
- Moscow Exchange provides mechanisms for its staff and third parties to report information on corruption risks (including anonymously).

Key documents:

- Code of Professional Ethics of Moscow Exchange
- Regulation on the Identification and Prevention of Conflict of Interest in the Implementation of the Activities of the Organiser of Trading and the Activities of the Operator of the Financial Platform by Moscow Exchange
- The policy aimed at preventing corruption offences
- The new version of the Rules for Reporting Violations and Abuses

Countering Unfair Practices

Measures to prevent, detect and combat the misuse of insider information and/or market manipulation have been developed and are in place at Moscow Exchange, including with regard to the availability of internal documents, the designation of responsible persons, and the enforcement of internal control rules to prevent, detect, and combat the misuse of insider information and/or market manipulation.

Financial monitoring

Moscow Exchange has developed an internal control system to combat money laundering and the financing of terrorism and the proliferation of weapons of mass destruction.

Moscow Exchange has registered with the US Internal Revenue Service (IRS) as a financial institute observing the requirements of FATCA (Participating Financial Institution not covered by an IGA). It has been assigned Global Intermediary Identification Number (GIIN) XNBBND.00005.ME.643.

CRS (Common Reporting Standard) is an international equivalent of FATCA aimed at improving tax transparency and preventing global evasion of taxes. In May 2016, the Russian Federation confirmed its participation in fulfilling the CRS requirements. Organisations in the Russian financial market are obliged to identify customers who are tax residents of foreign countries (territories) and provide data on such customers and their accounts to the Federal Tax Service of Russia.

Compliance for the market

Moscow Exchange creates compliance technologies that help market participants consider their customers and financial instruments through the lens of Moscow Exchange's experience and to improve the quality of their risk assessment and compliance with the regulatory requirements.

Since 1 July 2019, Moscow Exchange has sent requests for the list of insiders to be provided by bidders via the electronic data interchange system (EDI) to the address of the bidder in Moscow Exchange's EDI. The Lists of Insiders system developed is intended for the creation, maintenance, accounting, storage, and transfer of lists of insiders to the trade organiser in accordance with Art. 9 of Federal Law No. 224-FZ, dated 27 July 2010, 'On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation' (the 'Insider Law').

The Lists of Insiders system was designed to provide functionality for the submission of lists of insiders to stock exchanges by entities subject to the Insider Law.

Moscow Exchange guarantees the secure transmission of information over a closed communication channel using SSL connection and data encryption.

In addition, Moscow Exchange mitigates the risks of unauthorised access to the information in the Lists of Insiders system by ensuring that representatives of entities subject to the Insider Law are authorised when they are provided with a login and password to access the system.

Code of Conduct

Moscow Exchange promotes the establishment and propagation of the best compliance practices in the market. In 2021, to establish and maintain standards of good conduct, adherence to which contributes primarily to a favourable investment environment in the Russian financial market, a Code of Conduct was created on the joint initiative of the Bank of Russia, SRO, Moscow Exchange Group, and trading and clearing members. A mechanism for adherence to the Code was implemented, and information on the Code was collected and reviewed. The Code was approved by the Exchange Council and the Supervisory Board of Moscow Exchange.

The Code is advisory in nature. In this, however, taking into consideration the importance of the Code's goals, Moscow Exchange Group encourages organisations to join the Code and strive to conduct their activities in the financial market in accordance with its principles. To join the Code, organisations must send a signed Declaration of Joining the Code to the Department of Internal Control and Compliance of Moscow Exchange.

If a breach of the Code or a situation requiring attention related to the Code or its scope of application is identified, the relevant information can be forwarded to [the Hot Line for Compliance](#). If necessary, the Bank of Russia, SRO, or other organisations (a working group format) will be invited to consider the respective enquiries.

Key documents:

- Federal Law No. 224-FZ, dated 27 July 2010, 'On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation'
- Instruction of the Bank of Russia No. 5129-U, dated 22 April 2019, 'On the Procedure for Transfer by Legal Entities specified in Cl. 1, 3-7, 11, and 12 of Art 4 of Federal Law No. 224-FZ, dated 27 July 2010, 'On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation' of the List of Insiders to the Trade Organiser through which Transactions in Financial Instruments, Foreign Currency, and/or Goods are Carried Out, upon its Request'
- Procedure for the Transfer of Insider Lists to Moscow Exchange MICEX-RTS Public Joint-Stock Company dated 22 July 2022
- Code of Conduct

Responsible body:

- Department of Internal Control and Compliance.

Mechanisms for reporting instances of corruption and violations of standard business practices

205-2 2-23 2-25 2-26 3-3

The Group created SpeakUp!, a portal for reporting compliance issues, which enables the responsible officers to be promptly informed of possible instances of corruption and violations of standard business practices. The information reported is considered confidentially, and the Group's anti-corruption policy guarantees non-retaliation – official or otherwise – against those who report information. After processing, statistics on reports submitted via SpeakUp! are sent to the Audit Committee, and, if necessary, they are escalated to the Supervisory Board. Third parties can use the SpeakUp! function on the [Group's website](#).

Employees can also use the SpeakUp! portal to get advice on ethical business conduct and anti-corruption. Moscow Exchange adheres to the open-door principle. Employees can also directly contact the compliance department by phone, submit questions via a dedicated email address, and use the internal compliance portal. Information about obtaining advice on business ethics is provided to employees in the course of training on anti-corruption policies and methods.

The following procedure to identify situations showing signs of a breach has been implemented and used at Moscow Exchange:

1. A mandatory investigation is conducted.
2. If necessary, the responsible department (compliance) may involve other departments in the investigation.
3. In the conduct of the inspection, written explanations may be obtained from those who have committed violations, along with other documents necessary for the purposes of the inspection.
4. A report is drawn up on the results of the inspection which includes the grounds for and timing of the inspection, the violations found during the inspection, their causes and the persons responsible for them, as well as proposals and recommendations for remedying the violations found and preventing them in the future, which is submitted to the Chairman of the Executive Board of Moscow Exchange.

5. Based on the results of the inspection, the Chairman of the Executive Board of Moscow Exchange decides on the imposition of disciplinary and/or material liability actions on the persons who have committed the violations, as well as on sending documents to law enforcement bodies and/or the courts for the imposition of property, administrative, or criminal liability actions in accordance with the laws of the Russian Federation.

To ensure that staff awareness of anti-corruption practices and methods remains high, Moscow Exchange Group provides information to its personnel at several levels:

1. Upon hiring, new employees undergo a brief training course and read and sign key documents.
2. Whenever the values, principles, or behavioural standards and rules of Moscow Exchange change, staff are informed accordingly through the internal portal and other means of internal communication (the corporate magazine, posters, newsletters, etc.).
3. Supervisory Board members who are not employees of Moscow Exchange Group are introduced to new values, principles, standards, and rules of conduct when approving the relevant documents.
4. The Group also runs an internal training course that is mandatory for all employees.

Approach to identifying material breach of legislation

2-27 3-3

Pursuant to Moscow Exchange's Rules for Managing Risks Associated with the Activities of a Trade Organiser and Digital Financial Asset Exchange Operator, any events which lead to the following consequences shall be treated as a material breach of the legal requirements of the Russian Federation:

1. Penalties imposed by supervisory bodies in the form of fines exceeding RUB 700,000.
2. Possible suspension of certain operations, or the suspension of activities.
3. A surge of negative feedback from customers/ counterparties in excess of 70% of the average number of negative publications for the previous year.

4. Negative information in the media about the management of Moscow Exchange.
5. Financial loss exceeding the limit set for the current year for the relevant type of risk.
6. Disruption of key Moscow Exchange systems.
7. Violation of deadlines for the implementation of key strategic areas by 12 months or more.
8. Significant increase in the implementation cost in key strategic areas.
9. Significant reduction in the profitability of the strategic areas being implemented.
10. Significant reduction in the profitability of key Moscow Exchange products.
11. Significant information leaks or successful attacks on key Moscow Exchange systems.
12. Other consequences which may have a significant negative impact on Moscow Exchange operations.

Approach to taxation

207-1

The approach to taxation is described in the tax strategy of Moscow Exchange Group. In its tax-related activities, the Group relies on the requirements of tax legislation and considers the effective management of tax risks to be a significant factor in increasing the Group's value. In 2022, there were no tax disputes with the Group.

The Company values its reputation as a responsible taxpayer and strictly complies with the tax laws in all jurisdictions where it does business. As a major taxpayer, the Group recognises the importance of being a socially responsible business and strives to balance corporate, government, and public interests.

The tax strategy was developed in 2021 and approved in 2022. As of the date of this report, the tax strategy has not been made public.

The Group adheres to the following guiding principles with regard to taxes:

- systemic, consistent, and transparent management of tax-related issues;
- clear allocation of functions and responsibilities among the parties involved in tax relations;

- participation of the Group's senior management in decision-making on key tax issues, as well as the timely involvement of tax experts in decision-making on corporate issues;
- availability of effective tools for monitoring the implementation of decisions, including the automation of key processes and procedures.

The tax strategy is approved by the Supervisory Board of Moscow Exchange. The tax strategy is revised whenever the approaches set out in the tax strategy are changed.

207-2

The Internal Audit Service (IAS) is responsible for monitoring compliance with the tax strategy and with legal requirements. The tax management system is assessed by the IAS at least once a year. The approach to taxation is set out in the Group's tax strategy.

Moscow Exchange and the NCC take the following approach to tax risks:

- Tax risks are integral to the Group's risk management and internal control system. They are identified according to the principles established by Moscow Exchange's Supervisory Board: continuity, economic feasibility, and efficiency.
- All tax risks identified are subject to assessment and materiality ranking.
- Tax risks are monitored quarterly through control procedures.

The fulfilment of tax obligations is subject to an annual audit procedure and is disclosed in the Group's annual report.

207-3

Moscow Exchange and the NCC are involved in tax monitoring. The NSD plans to join tax monitoring in 2024. Tax monitoring involves an open dialogue between the companies of the Group and the tax authorities. The exchange of information is facilitated via remote access to the information systems of Moscow Exchange and the NCC, as well as to their accounting and tax reports. This method of providing

data to the tax authority allows the Group to promptly coordinate a position with the tax authority on the taxation of planned and completed transactions.

Moscow Exchange has joined the following organisations which discuss issues related to transparent taxation: National Financial Association Self-Regulatory Organisation (SRO NFA), Association of Banks of Russia (ABR), and National Association of Stock Market Participants (NAUFOR). Moscow Exchange is involved in the preparation of amendments to tax legislation based on best practices and representing the interests of financial market participants.

The Group discusses pressing issues associated with the amendment of the tax legislation at working groups, committees, and roundtables. It also prepares draft regulations and requests for clarification of the legislation. It can also analyse, update, and submit proposals to government authorities to amend the tax legislation.

Key documents:

- Tax Strategy of Moscow Exchange Group

Responsible bodies:

- Operational subdivisions: Finance Unit (Accounting, Taxation Group)
- Executive Board of Moscow Exchange (review of risk management regulations)
- Risk Management Committee
- Supervisory Board (taking decisions on the tax risk management policy)

Supply chain management

Moscow Exchange Group emphasises responsible supply chain management and close cooperation with the suppliers of products and services to ensure the economic efficiency of procurement and to mitigate relevant financial and non-financial risks. The Group has a vested interest in developing fair competition in the market and strives to cooperate with reliable and responsible suppliers.

Key documents:

- [Regulation on Procurement of Moscow Exchange](#)
- Internal regulations on interaction between Moscow Exchange and other companies of the Group

Responsible bodies:

- Operational subdivisions (procurement initiation, preparation of requirements and terms of reference)
- Procurement Assurance Department (organisation and implementation of procurement)
- Procurement Committee (approval of purchases exceeding RUB 6 million)
- Executive Board of Moscow Exchange (approval of purchases exceeding RUB 300 million)
- Supervisory Board of Moscow Exchange (approval of purchases exceeding RUB 600 million)

Key principles of procurement:

- Transparent procurement: any supplier may fill out a questionnaire on Moscow Exchange's website. Auctions are held on a B2B digital trading platform.
- Equality, fairness, non-discrimination, and no imposition of unreasonable competition restrictions on participants in procurement: all participants, regardless of the size of their business and their country of registration, enjoy equal rights to participate if the transparency and substantive criteria are met.
- There is no additional bidding stage after the final call for bids is announced, unless there are justified changes in the terms of reference, in which case the process is treated as a new procurement.
- There is no provision of services by suppliers who violate Russian legislation currently in effect, including the Labour Code.
- There is zero tolerance for any corrupt practices.

2-6

The bulk of procurement by Moscow Exchange Group is related to IT, specifically to the development, maintenance, and purchase of modern software and hardware. Due to Moscow Exchange's specific requirements, its activities often demand unique technological solutions. In most cases, such challenges are solved by consultants and contractors. The Group contributes to the increase in the demand for innovative and high-tech products and services and helps create new jobs in the supply chain.

Supply chain risk management

414-1

Moscow Exchange Group always assesses the economic, financial, and related-party risks associated with all its suppliers, using the latest data for verification (which should be no more than one year old). Suppliers assessed to have a high level

of risk are not granted contracts. A supplier found to be dishonest (breaching a contract or bidding requirements) may be disqualified.

In accordance with internal regulations, the procurement documentation includes a link to the corporate portal or an email address where losing bidders can submit feedback on the transparency and fairness of the procurement procedures.

To manage ESG risks in the supply chain, Moscow Exchange Group uses standard contract templates containing clauses stipulating that suppliers must comply with Russian legislation (including the Labour Code), as well as a clause emphasising the Group's zero tolerance for corruption and bribery. In the agreements concluded between Moscow Exchange Group and its suppliers, the parties warrant that their employees will not offer, solicit, or consent to any corrupt payments (in cash or valuable gifts) to any persons, nor accept such money or gifts.

R | RESPECT FOR HUMAN RIGHTS, EQUAL OPPORTUNITIES AND STAFF ENGAGEMENT

2-23

Moscow Exchange Group recognises the important role of employees in the successful achievement of its goals and its consistently high reputation in global financial markets. The Group places great emphasis on professionalism: employees are expected to successfully achieve the companies' objectives in finance and IT. Therefore, HR strategies therefore prioritise training and development, personal growth, well-being, and comfort in the workplace.

The Group fosters a strong corporate culture, which covers gender equality issues, labour rights, and human rights. It continuously improves its incentive and social, programmes and encourages employees to maintain good health. All employees can communicate their opinions on various matters to their employer, and they can have a say in internal

regulations, practices, and business processes in line with their competencies. All this helps the Group in solving its challenges on an international level while building the country's financial market infrastructure.

Key documents:

- Internal labour regulations
- Regulation on Variable Remuneration
- Regulation on Annual Bonuses
- Regulation on Corporate Social Support

Responsible body:

- Personnel and Human Resources Policy Department

Employee engagement and efficiency

Key HR policy objectives

2-24

The Human Resources Policy of Moscow Exchange Group sets the following key objectives:

- engagement, motivation, and retention of high-end professionals
- provision of opportunities for continuing professional development
- creation of an atmosphere facilitating the realisation of employee potential and the achievement of the Group's strategic goals

2-12

The Supervisory Board of Moscow Exchange considers issues associated with HR management, identifies strategic objectives in this area, and monitors the achievement of corporate goals. Among the matters considered at meetings of the Supervisory Board are:

- approval of key HR policy documents, including the Long-Term Incentive Programme;
- setting and controlling the implementation of annual corporate goals that cascade down to senior management and line employees and monitoring their fulfilment.

Social climate

2-29

Moscow Exchange Group is strongly focused on the opinions and motivations of its employees in order to maintain a positive social climate in the workplace, as well as to encourage staff to take a keen interest in operating results (for more details about the specific measures taken, see the Employee Remuneration and Motivation and Corporate Culture subsections. Monitoring is carried out in the form of an annual comprehensive study of employee engagement.

The comprehensive study of employee engagement consists of three sections:

- **Engagement** – an index reflecting employee motivation and the productivity of the working environment in a department
- **Loyalty** – an index reflecting the commitment of company employees

- **Satisfaction** – the extent to which employees are content with their work, working conditions, and the work atmosphere at the company

Each of the three components is measured based

on **58** closed-ended

and

4 open-ended questions.

The results of the study are used to develop and prioritise measures aimed at improving employee levels in these three areas. Employee focus groups are also held to prepare further actions.

Employee performance reviews

404-3

Moscow Exchange Group conducts annual performance reviews of all staff who have worked at the Group for more than three months of the reporting year. The criteria used in the reviews include both the achievement of personal targets and the completion of compulsory compliance training. Any confirmed violations of corporate requirements are also taken into account.

Employee remuneration and motivation

Employment relations

2-23 3-3

Employment relations at the Group's companies fully comply with Russian law. The companies of the Group also provide additional social benefits.

The commitment of the Group's companies to the principle of non-discrimination in their hiring practices and to fill all vacancies objectively are enshrined in the values of the Group and the Code of Professional Ethics of Moscow Exchange.

All types of leave envisaged by Russian law are provided to Moscow Exchange employees. These include annual paid leave, unpaid leave at the employee's request, educational leave, maternity and parental leave, leave to care for a child of up to three years of age, days off to care for a disabled child, days off to donate blood, etc.

402-1

Moscow Exchange strives to avoid forced redundancies. The minimum notice period for future operational changes at the Group's companies is two months, in accordance with Russian law.

Employee remuneration and benefits

Moscow Exchange Group offers its employees competitive levels of pay, which includes fixed and variable (bonus) components. Both components

are determined based on an existing system of levels of seniority (pay grades) and labour market data. The bonus portion depends on the overall performance of the Group and the employee's individual performance.

401-2

Moscow Exchange Group provides its full-time employees with a benefits package that includes insurance services, medical insurance, and other perks (including programmes that encourage a healthy lifestyle and hobbies). Insurance packages are also available to part-time and temporary staff.

The Social Affairs Commission of Moscow Exchange considers requests from employees for financial aid due to accidents or emergencies not covered by the existing insurance programmes¹.

Type of programme	Description of programme	Types of employees covered by the programme
Insurance services	Accident and illness insurance Voluntary health insurance ² International health insurance International travel insurance	All employees All employees; they may also insure their relatives at their own expense All employees; they may also insure their relatives at their own expense All employees covered by voluntary health insurance
Medical services	Paid sick leave of up to 100% (up to 10 days in accordance with Russian law)	All employees
Parental leave	Compensation for parental leave in accordance with Russian law	All employees
Maternity leave	Compensation of up to 100% (in excess of the statutory level established by Russian law)	All employees
Social programmes	PrimeZone corporate discount programme	All employees

In addition to the social package, Moscow Exchange funds the activities of a range of hobby clubs, including Moscow Exchange Smart (for the television quiz show What? Where? When?), a cooking club, Moscow Exchange Walk (walking tours of Moscow), and various sports groups. Because the Group

supports its employees in trying to lead active lifestyles, there is a fitness room at the Moscow Exchange office.

¹ The Commission considers requests from employees of all the Group's companies except NSD, where another similar commission operates.

² Urgent medical aid is provided to all employees, including part-time and temporary employees, under the voluntary health insurance programme.

Corporate culture

Moscow Exchange Group strives to develop its corporate culture based on the principles of leadership, commitment, and employee engagement.

Key corporate culture objectives:

- increasing employee engagement in implementing strategy;
- developing effective models of behaviour for employees to implement business objectives at Moscow Exchange Group;
- improving the efficiency of vertical, horizontal, and cross-functional cooperation by employees.

The corporate values of Moscow Exchange Group are integrated in all key HR processes, including the internal communications system, incentive system, performance review system, and corporate training processes. Staff are encouraged to provide feedback (see the Social Climate subsection) to improve employee engagement.

Employee appreciation

Moscow Exchange has non-financial incentive programmes in place for its employees.

As part of the Appreciation Programme, an annual contest is held to identify the most active and best performing employees of Moscow Exchange, as well as the best functional and project teams. Winners are selected in five categories, and the corporate intranet is used for the voting. The winner of the 'CEO's Choice' category is selected by the Chairman of the Executive Board.

The MEMS project was launched in 2016. Employees receive the currency from their managers in recognition for their performance, from their colleagues for providing help in the course of their work, and from the companies of the Group for active participation in corporate activities. They can redeem the currency at the Group's in-house store to buy special Moscow Exchange souvenirs that are unavailable for purchase elsewhere.

Learning and development

404-2

Moscow Exchange's learning and development system includes educational programmes, development in the workplace, and self-study resources. Employees themselves choose what type of training they would like to engage in. Staff can use state-of-the-art technologies, corporate resources, and other tools to meet their development needs.

Evaluation of learning needs

3-3

Moscow Exchange has traditionally paid considerable attention to the quality of training, and it regularly analyses employee competencies and experience participating in training courses and programmes. This helps Moscow Exchange plan the further development of the professional development system. A Net Promoter Score (NPS) is included in the KPIs of the Training Unit of Moscow Exchange.

To identify learning needs, a comprehensive study is carried out to analyse HR risks, assess the effectiveness of educational activities, obtain 360-degree feedback, and identify the most promising employees.

Every Moscow Exchange employee can apply every quarter to take hard-skills training. All requests are considered and approved based on the allocated budget, provided that there is a confirmed business need for the training. The Group also conducts compulsory training sessions in soft skills for novice managers. Individual development programmes are created for members of the succession pool (successors to key positions).

Diversity and equal opportunity

2-23 3-3

In accordance with Russian law, the principles of Conventions No. 111 and No. 156 of the International Labour Organisation, and the Code of Professional Ethics of Moscow Exchange Group, the Group does not tolerate any form of discrimination in the workplace. Moscow Exchange Group respects all cultures, opinions, and lifestyles. It rejects all forms of harassment and discrimination based on gender, religion, way of thinking, ethnicity, nationality,

physical ability, gender identity, skin colour, marital status, political views, or affiliation/non-affiliation with any social group.

Moscow Exchange does not participate in any actions that could contribute to a workplace atmosphere of intimidation, hostility, abuse, or abasement of human dignity. The Group strives to provide equal employment opportunities and ensure gender equality among its staff.

The work schedule and scope of work of Moscow Exchange employees are regulated by the respective job descriptions and internal regulations, which are fully compliant with the Labour Code of the Russian Federation. Additional hours of work – or any overtime work as stipulated in the respective employment contract – require the personal consent of the employee, and such work is paid in accordance with Russian labour law.

According to the Code of Professional Ethics, hiring, filling vacancies, determining remuneration, and providing opportunities for upgrading employee skills and training are based on the professional qualities and performance metrics of individual employees. The Group has zero tolerance for any forms of favouritism.

Key documents:

- Human Resources Policy of Moscow Exchange Group
- Code of Professional Ethics of Moscow Exchange
- ILO Conventions Nos. 111 and 156
- UN Universal Declaration of Human Rights

Responsible body:

- Personnel and Human Resources Policy Department

Occupational health and safety and well-being of employees

3-3 403-1 403-4 403-7 403-8

Moscow Exchange Group takes responsibility for the health and safety of its employees. It sets corresponding goals and objectives, and it plans

and funds activities to achieve them. The occupational health and safety system of Moscow Exchange conforms to the requirements of Russian law. It covers 100% of the Group's employees. No contractors or business partners of the Group are covered. The Group also has an Occupational Health and Safety Policy, which was approved in 2018 and lays out corporate standards for occupational health and safety.

According to the Occupational Health and Safety Policy, Moscow Exchange Group assumes the following obligations:

- compliance with the requirements of Russian law on the occupational health and safety of employees and assurance of compliant working conditions;
- provision of safe working conditions through consistent and continuous activities aimed at preventing accidents, work-related injuries, and work-related ill health, including by managing professional risks;
- information of all employees of any hazards, harmful factors, or professional risks identified in the workplace;
- improvement of the occupational health and safety management system in order to ensure it meets the Group's needs and facilitates the professional development of employees responsible for occupational health and safety;
- provision of employees with personal protective equipment, if needed;
- involvement of employees (or representative bodies authorised by them) in the occupational health and safety management system and collection of feedback from employees;
- assurance of proper functioning of all levels of control over compliance with OHS regulations;
- reinforcement of the personal interest of each employee in ensuring safe working conditions by increasing responsibility for compliance with OHS requirements;
- assessment of working conditions regularly and monitoring of compliance with statutory OHS requirements, including sanitary rules imposed to combat epidemics.

Evaluation of working conditions and professional risk assessment

403-2

The heads of Moscow Exchange's business units manage OHS activities in accordance with the internal regulations. In the event of any complaints regarding working conditions (such as a lack of light, malfunctioning ventilation or air-conditioning systems, etc.), or where any occupational health and safety violations are identified, any employee can submit a request to technical support describing the problem.

403-8

The OHS management system underwent an external audit in 2020. The audit ascertained that the system conformed to Russian law. No audit was conducted in 2022.

The processes for the internal audit of the occupational safety management system are prescribed in local regulatory documents on occupational safety (regulations, procedures), in which the main significant areas are identified with the allocation of responsibility among officials. The internal audit of the occupational health and safety management system falls within the competence of the Moscow Exchange Internal Audit Service.

Occupational health and safety training

403-5

All new employees of the Group undergo compulsory induction briefings on occupational health and safety, fire safety, civil defence, emergencies, and electrical safety. In addition, the OHS training system includes:

- an interactive video course on occupational health and safety;
- training and exams at a special study centre;
- an intranet portal where employees can review all OHS instructions and regulations and undergo online training.

Good health and employee well-being

403-6

Moscow Exchange has a strong focus on the health of its employees, as well as their relatives, and provides the following types of insurance:

1. Voluntary health insurance (VHI), which ensures that the employee and his or her relatives receive necessary medical services, including paid ambulance, dental care, and treatment in high-comfort wards.
2. Voluntary international health insurance (VIHI), which provides assistance to employees with critical illnesses (cancer, surgical procedures such as cardiovascular surgery, neurosurgery, etc.) in clinics around the world, including in the Russian Federation.
3. Accident and Illness insurance that provides compensation for damage to the life and health of employees, as well as additional financial support for relatives in the event of the loss of a breadwinner or the disability of an employee.

If necessary, the voluntary health insurance provides employees with support for pregnancy and childbirth.

Tips on healthy eating and living are regularly posted on the intranet, and there is also a healthy food station and regular Health Weeks.

Fruit is provided for employees at the Group's offices, the cafeteria offers healthy food, and vending machines feature a healthy assortment of snacks.

There is a gym for employees with cardio machines and table tennis tables, and opportunities are provided for running, swimming, volleyball, basketball, soccer, and hockey. Competitions are also held. The Moscow Exchange indoor soccer league holds a tournament every year, with teams from various investment companies and banks taking part.

To prevent the spread of infectious diseases, especially COVID-19, the Group's companies take comprehensive measures to continually protect their employees.

E | ENVIRONMENTALLY FRIENDLY AND TRUSTED MARKET INFRASTRUCTURE

Risk management

Moscow Exchange Group has successfully established an integrated risk management system that complies with Russian regulatory requirements, as well as with leading international standards and best practices.

Key documents:

- [Market operator-related risk management rules](#)
- [Financial platform operator-related risk management rules](#)
- [Declaration on Business Continuity](#)
- [Business Continuity Policy of Moscow Exchange](#)
- [Regulatory Risk Management Policy of Moscow Exchange](#)
- [Personal Data Processing Policy of Moscow Exchange](#)
- [Regulation on the Audit Committee](#)
- [Regulation on the Internal Audit Service](#)
- [Declaration on Information Security](#)
- [Policy on Information Security Management of Moscow Exchange](#)

Responsible bodies:

- Risk Management Committee of the Supervisory Board
- Risk Management Unit
- Internal Audit Service
- Internal Control Service

Role of management bodies in risk management

3-3 2-24

ESG risk management is handled by the Supervisory Board and other management bodies, such as participants in the Group's integrated risk management system. They perform monitoring and control procedures.

The Supervisory Board of Moscow Exchange is responsible for establishing the principles and approaches of the risk management system, including approving the risk management strategy, internal documents, and policies that stipulate actions to prevent the materialisation of risks and to minimise their consequences.

The Risk Management Committee of the Supervisory Board reviews risk management reports and develops recommendations for managing individual risk profiles, analyses internal procedures and proposes measures for improving them, and monitors the reports submitted. Similar structures have been established within the Group's companies, including the Risk Committee of the NCC Supervisory Board and the Risk Committee of the NSD Executive Board. Moscow Exchange has also created a separate structural unit that is responsible for managing the risks of the market operator.

ESG risks and their potential impact on the Group's operations are identified annually within the Group's integrated risk management system. Risk acceptance and pre-approval of risk management issues are submitted for discussion at Supervisory Board meetings. The Executive Board is responsible for defining the acceptable level of risk.

The Group has conducted regular training sessions for its employees to improve their risk identification skills. The sessions are part of the Development Strategy for the Risk Management System. Risk-management KPIs are included in the criteria used by management for assessing employee performance.

Key risk profile

2-24

Each of the Group’s companies faces different types of risk, depending on the specific nature of their activities. As the parent company of the Group, Moscow Exchange faces risks associated with the organisation of trading, as well as with transactions involving its own assets. The NSD, as a core element of Russia’s financial market infrastructure, faces risks

in its depository activities. The key risk bearer in the Group is the NCC, which acts as a clearing house and central counterparty for all major markets of the Group and as a commodity delivery facility for the commodities market.

The Group’s financial and non-financial risk map is updated annually following the results of the risk identification procedure. Non-financial risks are classed into several categories, as described in the table below.

Risk (level) significance	Description	Risk management activities
High	Operational Risks	- Ensuring that operational risk is identified using various operational risk management tools. - Ensuring operational reliability and protection against information threats. - Ensuring the collection and registration of information about operational risk events and losses from its implementation. - Determining losses and compensation for losses from the implementation of operational risk events. - Determining quantitative and qualitative assessment of the level of operational risk. - Determining the choice and application of methods to respond to operational risk. - Ensuring operational risk monitoring
Strategic risk		
High	Risk of expenses (losses) resulting from - erroneous assumptions made by management in preparing, approving, and executing strategic plans; - inadequate execution of decisions made by management; (the impact of changes caused by external factors and that affect or could affect the Group’s performance	- Developing transformation projects in organised trading or related activities, including providing additional services and access to organised trading for new financial instruments, foreign currency, goods, and other organisational or technology changes in a uniform and structured manner - Conducting feasibility studies for transformation projects, including analysing the following variables: investment feasibility, potential economic benefits, mitigation of identified risks, and potential operational improvements - Analysing the effectiveness of implemented transformation projects, including post-project (post-investment) monitoring - Planning the development of strategic activities (e.g., by designing strategic plans). As part of this process, Moscow Exchange creates a five-year strategic plan, prepares a roadmap to guide the execution of strategy, assesses the resources needed to successfully execute the strategic plan, and receives final approval of the strategic plan from the Supervisory Board, which may decide to amend certain aspects - Evaluating the strategic plan in terms of feasibility and amending it, if needed. This process may also involve the assessment of related risks, as well as the evaluation of whether the strategic plan is consistent, aligned with market conditions, acceptable to stakeholders, and likely to generate a competitive advantage for Moscow Exchange Group

Risk (level) significance	Description	Risk management activities
Compliance risk		
High	Risk of losses due to failure to comply with legislation, internal regulations and standards issued by self-regulatory organisations (if such standards and rules are obligatory), or as a result of sanctions or other enforcement measures taken by oversight agencies	- Monitoring legislative developments - Coordinating with regulatory authorities on the development of new regulations - Identifying regulatory risk in existing and proposed internal procedures - Analysing best practices in internal control - Obtaining preliminary approval and performing background checks when onboarding clients, signing contracts with counterparties, admitting securities to trading, launching new products or services, etc. - Setting up automated controls, including controls to run parties (stakeholders) through compliance checklists - Ensuring that the necessary policies and procedures are in place - Conducting mandatory training The Internal Control and Compliance Department is responsible for managing compliance risk.
Information security Risk		
High	Risk of the security (confidentiality, integrity, accessibility) of information assets being compromised as a result of the materialisation of information security threats	- Ensuring the accessibility, integrity, and efficient use of information assets - Ensuring information confidentiality and preventing harm from the disclosure of confidential information, including personal data - Building an effective system for monitoring and protecting the Group’s information infrastructure - Increasing protection and optimising the cost of ensuring information security via a risk-based approach - Raising awareness of information security risks among Group employees
Reputational risk		
High	Risk of expenses (losses) or any other adverse effects resulting from a negative perception of Moscow Exchange Group by its counterparties, traders and their clients, shareholders, the Bank of Russia, or others which may adversely impact the Group’s ability to maintain its existing relationships and/or to establish new ones and provide access to sources of financing on an ongoing basis	- Collecting and analysing coverage of Moscow Exchange Group in the media - Conducting regular analysis of information that may pose a reputational risk which has been obtained from media and other sources, including analysis of the impact of reputational factors on Moscow Exchange’s financial position, the impact of the reputation of other Group companies on the Group’s reputation, and the impact of Moscow Exchange Group’s corporate charitable and marketing activities on its business reputation - Performing ongoing assessments and monitoring of PR through regular assessment of Moscow Exchange’s performance and monitoring the number of complaints and claims from clients and counterparties and positive and negative coverage of shareholders and related parties in the media - Regularly monitoring the business reputation of shareholders, related parties, and management - Overseeing the fair presentation of information in the financial statements and any other published information provided to shareholders, clients and counterparties, regulatory and oversight bodies, and other stakeholders, including for advertising or promotional purposes - Preventing persons with access to certain information from using that information for their personal benefit - Providing management and employees with data on negative and positive coverage of Moscow Exchange Group in the media and other sources and considering and analysing the completeness, credibility, and objectivity of such information in a timely manner - Taking disciplinary action against employees whose misconduct may create a risk of damage to Moscow Exchange Group’s reputation

Risk (level) significance	Description	Risk management activities
HR risk		
Moderate	Risk of expenses (losses) incurred by MOEX Group as a result of a lack of alignment between HR policy and business objectives, as well as the significant loss of key personnel or expertise	- Review of the parameters of the long-term incentive programme for key management of the Group - Management of the performance evaluation system and review of the compensation structure - Revision of the ratio between components of remuneration - Employee engagement surveys - Annual planned training programme for mid-level managers - Succession planning - Cross-functional internship programme - Internal coaching programme - Talent management programme to identify high-potential employees and facilitate their individual development
Climate risks [TCFD]		
High	Risks of financial losses as a result of reduced demand for listing services and a decrease of investment prospects for issuers in a number of industries; physical damage or loss of property, as well as malfunctions in equipment and in the availability of services to clients; additional expenditures due to regulatory changes and the need to introduce new technologies, which may adversely affect the revenue and reputations of Group companies	- Technological, informational, and organisational solutions for the protection of equipment and data - Diversification of financial risk hedging instruments - Introduction of ESG requirements in listing rules for issuers - Development and implementation of a greenhouse gas emissions accounting system by the Group's organisations See the Climate Agenda subsection for more information on climate risk management

Internal audit and internal control

Moscow Exchange's risk management system is based on the COSO principles and is structured on the 'three lines of defence' model, which stipulates that risk management and internal control responsibilities

be distributed among management bodies, business units responsible for control and coordination, and the internal audit function. The Group continues to improve its internal control system to maintain a high level of performance.

OVERVIEW OF MOSCOW EXCHANGE GROUP'S REPORTING SUITE	2022 SUSTAINABILITY PERFORMANCE HIGHLIGHTS	SUSTAINABILITY DATA	SUSTAINABILITY APPROACHES AND PROCEDURES	APPENDICES
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COSO Internal Control System

Line of defence	Responsibility	Units
First line of defence	Identifying, assessing, and managing risks and developing and implementing policies and procedures governing business processes	All holders of business functions and employees of the operating units of Moscow Exchange
Second line of defence	Ongoing risk monitoring and risk management by units as part of their functions Infrastructure resilience issues include: - Information security - Compliance with legislation and internal documents - Prevention of corruption and unlawful and fraudulent activities - Prevention of improper use of inside information and/or market manipulation - Prevention of conflicts of interest	- Operational Risk, Informational Security, and Business Continuity Department - Internal Control and Compliance Department - Internal Control Service - Security Department - Legal Department - Individual employees and business units of the Finance division
Third line of defence	Overseeing the efficiency of business activities, the management of assets and liabilities, and the effectiveness of the risk management system	- Internal Audit Service - Management Bodies of Moscow Exchange

Compliance with international standards

3-3

The Group conducts an annual audit of its compliance with the CPMI-IOSCO Principles for Financial Market Infrastructures, the COSO Enterprise Risk Management Framework, and the Basel Committee on Banking Supervision risk management guidelines.

counterparty, assessment of the accuracy of the central counterparty model, stress-testing of risks of the central counterparty, determination of the allocated capital of the central counterparty, and recovery of financial stability of the central counterparty. Operational audits are conducted every two years. The most recent audit was conducted in March 2022.

In 2020, NCC successfully underwent an operational audit to verify its compliance with the requirements of the Bank of Russia. The audit covered the following components: management of risks of the central

The NCC also underwent a certification audit in accordance with ISO 9001 Quality management systems in 2022.

Distribution of risk management responsibilities

Management bodies	- Approval of core risk management principles and approaches - Control and oversight of the risk management system - Key decisions to manage the most significant risks
Risk management and internal control services	- Monitoring of risk management processes and reporting to management bodies - Compliance with standards and requirements - Improvement of the internal control and risk management systems - Risk assessment - Development and implementation of risk management measures - Development and improvement of internal policies and procedures
Business and operational units	- Risk identification - Risk assessment

The Group's companies have developed risk and capital management strategies. As part of its risk management strategy, Moscow Exchange

Group reviews its risk appetite and risk tolerance annually in the context of the Group's strategic objectives.

Disclosure

Information policy

3-3

As a market operator, Moscow Exchange applies a transparent investor- and bidder-oriented information policy regarding its activities. This ensures that stakeholders can exercise their rights to reliable information to the fullest possible extent. As per the information policy, the purpose of disclosing information about Moscow Exchange as an issuer of securities is to reach all stakeholders so that they can make balanced decisions on holding Moscow Exchange equity or performing other actions.

Moscow Exchange complies with the following principles of disclosure regarding its activities:

- regularity and promptness of reporting
- accessibility to stakeholders and reliability and completeness of disclosures
- neutrality, namely the avoidance of prioritising certain groups of recipients over others
- accountability for information disclosure

Moscow Exchange does not evade the disclosure of adverse information if such information is material to shareholders or other stakeholders.

Disclosure at the request of government agencies

Moscow Exchange Group is obliged under Russian law to disclose information on market participants (issuers and bidders) to competent government agencies, including law enforcement agencies, for the prevention or investigation of potentially unlawful activities. Such disclosures may cover insider trading, market manipulation (Federal Law No. 224), or money laundering (Federal Law No. 115).

Information security

3-3 FN-EX-550a.3

Information security (IS) entails the protection of information and the equipment used to process it from accidental or deliberate interference, whether natural or artificial.

The main goal of ensuring IS is to appropriately protect the business processes and to minimise IS risks when organising trading and clearing services or when providing services on the Equity, Derivatives, Foreign Exchange, and Money Markets. This goal is achieved by ensuring and continuously maintaining the confidentiality, integrity, and accessibility of the Company’s protected information assets.

Key documents:

- Policy on Information Security Management of PJSC Moscow Exchange MICEX-RTS
- Declaration on Information Security
- Personal Data Processing Policy of Moscow Exchange
- Information Security Strategy

Responsible bodies:

- Operating Risk, Information Security, and Business Continuity Department
- Technical Policy Committee

Moscow Exchange has implemented an information security management system that meets the requirements of Russian law and complies with ISO 27001. Organisational and technical activities are continuously conducted to ensure information security and to manage IT infrastructure and information security incidents. The Security Operations Centre is responsible for monitoring and responding to information security incidents. The Group regularly conducts information security audits, intrusion tests, and anti-phishing tests to manage risks. Moscow Exchange uses its own equipment or that of a provider to protect against malicious attacks.

Market access and customer experience

FN-EX-550a.3

Moscow Exchange offers its clients information and technology services that provide real-time market data and information on indices and the results of trading.

It works to increase the appeal of its services in organising trade on the commodity and financial markets to investors and issuers.

Key documents:

- Listing Rules of Moscow Exchange
- Clearing Rules of the National Clearing Centre (JSC) for the Equity and Bond Markets
- Rules of National Settlement Depository JSC

Responsible departments:

- Customer Service Department
- Customer Support Department
- Technical Access Department

Moscow Exchange’s technology infrastructure provides market participants with a safe and reliable environment that supports uninterrupted trading, clearing, and settlement operations. Reliability is ensured by the following factors:

- high-quality risk management;
- well-capitalised central counterparty and settlement infrastructure;
- high standards of listing and information disclosure by issuers.

Moscow Exchange spares no efforts in ensuring convenience for its customers:

- develops new products, services, and methods of trading;
- extends trading hours;
- implements new technologies for access to trading and market data;
- strengthens cooperation with other markets and exchanges.

To continue developing Moscow Exchange as a trusted market participant, the Group has set the following objectives.

Category	Key objectives
Provision of additional world-class exchange services beyond traditional exchange products	Offer a wider range of exchange products and services beyond those currently available on traditional exchange markets (stocks, bonds, and derivatives)
Creation of uniform infrastructure for the entire Russian market, including traditional over-the-counter segments, based on a single set of post-trading services with integrated settlement, collateral, and risk management systems	Continue to enhance access for market participants and their customers to global OTC markets, offer better prices thanks to the exchange infrastructure, and further expand new tailored mechanisms for liquidity takers/makers that are recognised globally among OTC FX platforms
Development of central counterparty and central depository institutions	- Ensure the operational reliability of depository and clearing services - Modernise equity accounting infrastructure: consolidation of records, collateral management, and segregated record keeping - Maintain the high share of central counterparty repo transactions in the total volume of inter-dealer repo - Develop a market for standardised derivative financial instruments with centralised clearing and make it easier for market participants to sign long-term derivatives contracts
Reliability and efficiency of processes	- Ensure the uninterrupted operation of trading and information systems and promptly respond to potential disruptions - Implement measures to mitigate dependence on services provided by foreign vendors to better manage sanctions-related technological risk and account for macro-political factors

Category	Key objectives
Creation of new services for individuals and corporate clients	- Develop the Finuslugi.ru personal finance platform for retail investors, a one-stop shop for all financial products and services offered on the market - Develop a single marketplace interface for corporate clients, including a wide range of treasury services (asset and liability management) and division of services by trading, clearing, and settlement

RESOURCE EFFICIENCY AND ENVIRONMENTAL IMPACT

Environmental efficiency

Moscow Exchange Group hosts annual events to reduce negative impacts on the environment. In its operations, the Group is guided by the laws and regulations of the Russian Federation as well as corporate standards that ensure compliance with environmental requirements.

Key documents:

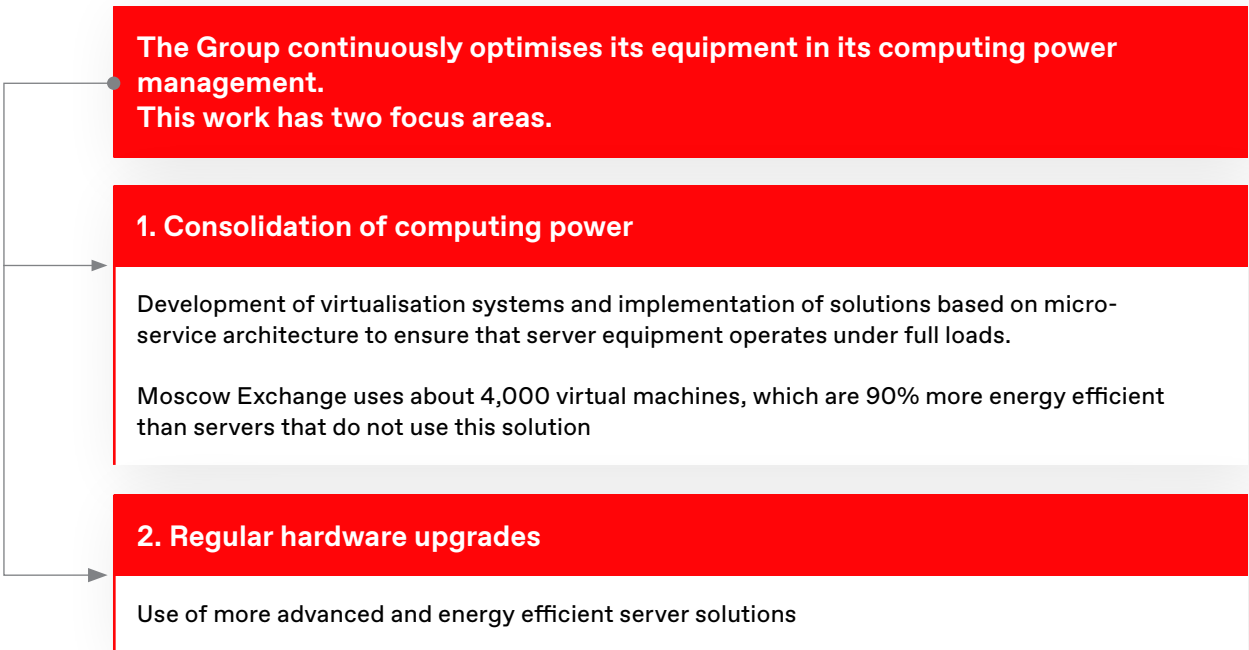
- Russian environmental legislation and standards
- Waste Generation Standards and Waste Disposal Limits approved by the Moscow Department of Resource Management and Environmental Protection up to February 2023
- Moscow Exchange Environmental Monitoring and Industrial Control Programme

Responsible body:

- Administrative Department of Moscow Exchange

Energy efficiency

The Group's companies have an extensive network of server and computer equipment across two data centres. Improvements in energy efficiency are therefore largely dependent on timely upgrades to the Group's equipment and the use of IT technologies to transmit information.



Modern equipment consumes less energy: every new generation of servers is about 2–3% more efficient than the previous one. Moscow Exchange's Technology Policy sets timelines for the upgrade of server equipment.

To reduce electricity consumption in our offices outside of business hours, hallway lighting systems, ventilation systems, and office air-conditioning systems are automatically turned off. In winter, cold air from outside is used to cool server rooms.

Climate change impact

Direct greenhouse gas emissions are emitted by the Group's corporate vehicles and the back-up diesel generators used to create electricity in the event of emergency outages on the part of the supplier. Indirect emissions stem from the use of electricity and heat purchased from energy suppliers.

The Group's modern fleet of vehicles is key to reducing its direct greenhouse gas emissions: most corporate vehicles were manufactured after 2014, and all of them have engines with environmental classifications of IV and V. Measures aimed at reducing indirect emissions are described in [Energy Consumption](#) subsection on p. 55.

Water consumption and waste water disposal

303-4 303-5

Moscow Exchange Group strives to improve the efficiency of water consumption at its offices. The Group receives water only from municipal water systems.

Wastewater (including from storm drains) is discharged only to municipal sewage systems, where it is treated in accordance with applicable regulations. No wastewater is discharged into bodies of water or into natural habitats designated as nationally or internationally protected areas. The Group does not operate in regions affected by water scarcity.

Air emissions

305-7

As a result of an inventory of emissions of harmful (polluting) substances into the atmosphere and their sources, it has been established that the sources of impact on atmospheric air are: emergency diesel generator sets (DGS), the operational printing station, and motor transport, including three organised sources of emissions:

- exhaust and ventilation stack of diesel generator set;
- tanks for diesel fuel;
- equipment of the Operational Printing Unit (paper cutting, creasing, paper boring, and thermal bagging of paper products).

and one fugitive, which is exhaust emissions from vehicles entering and exiting the underground car park.

Taking into account that there are substances of hazard classes I and II in the atmospheric emissions, it is planned to implement methods to calculate the volume of emissions, including cases in which technological equipment operates in a modified mode for more than three months, to determine the volume of pollutants in emissions from stationary sources.

Waste management

306-1 306-2 306-5

The activities of Moscow Exchange Group generate office waste (paper, non-industrial waste, fluorescent lamps, etc.), as well as e-waste and waste associated with the vehicle fleet. The Group aims to reduce its office waste and to increase the share of recyclable waste. For this purpose, the Group has taken the following measures:

- introduction of electronic document management to reduce the generation of paper waste;
- collection and disposal of used batteries;
- use of bins for the separate collection and disposal of non-industrial waste.

Moscow Exchange Group does not handle waste on its own, but transfers it for treatment, utilisation, storage, neutralisation, and disposal to specialised organisations holding appropriate licences for handling waste of hazard classes III–V.

Waste removal from Moscow Exchange Group facilities is carried out under contracts concluded with specialised organisations in accordance with the requirements of environmental legislation, with subsequent request for documents confirming the actual recycling of waste or its disposal in a solid waste landfill.

Disposal of waste of hazard classes I–II is carried out under a contract concluded with the federal operator.

After the planned replacement of office computer hardware, Moscow Exchange promotes its continued use by offering it to employees or by donating it to schools and orphanages.

The waste generated by Moscow Exchange Group does not directly affect any nationally or internationally protected areas.

A | ADVANCED PRACTICES OF RESPONSIBLE INVESTING

Global trends show that investment companies and financial institutions have been transforming their investment strategies. Issuers' commitment to the principles of sustainability is becoming an important factor in choosing recipients of investment. As a participant in the Sustainable Stock Exchanges initiative, Moscow Exchange upholds the principles of responsible investment and creates opportunities to expand sustainable practices in Russia.

Sustainability sector

3-3

In 2019, in cooperation with the Ministry of Economic Development of the Russian Federation, Moscow Exchange launched its Sustainability sector, a special sector for trading target-oriented securities.

Objectives of the Sustainability sector:

- to help companies, public authorities, and other issuers raise funds for environmental and social projects;
- to create an environment conducive to foreign investment in Russian bonds;
- to offer a set of instruments for funding initiatives that meet the objectives of national projects and comply with [Decree of the President of the Russian Federation No. 204, dated 7 May 2018](#), 'On National Goals and Strategic Objectives of the Development of the Russian Federation to the Year 2024'.

The Sustainability sector consisted of four independent segments in 2022.

Segments of Sustainability Sector in 2022

Green bonds	Social bonds	Sustainability bonds	National and adaptation projects
Green bonds are debt securities, the proceeds of which are used to finance projects aimed at improving the environment. Such projects include renewable sources of energy, environmentally friendly transport, the improvement of energy efficiency, reduction of GHG emissions, waste recycling, etc.	Social bonds are debt securities, the proceeds of which are used to finance social projects. Such projects include the creation of social infrastructure or development of social services, construction of affordable housing, development small businesses, and other social objectives.	This segment includes the securities of companies implementing projects that promote environmental and social sustainability.	Securities in this segment must be consistent with the objectives of national projects or be compliant with the taxonomy of climate adaptation projects.

Principles for including bonds in the Sustainability sector

FN-EX-410a.4

The green bonds segment includes bonds issued by Russian issuers whose bond issue(s), investment project(s), or issuer's document(s) meet the internationally recognised Green Bonds Principles (GBP) of the International Capital Market Association (ICMA) or the Climate Bonds Initiative (CBI) and the Russian principles/standards for environmental protection and/or green financing and/or sustainability established by the Securities Issuance Standards, provided that the issue, issuer, or project has received independent verification confirming compliance with these principles or standards.

The social bonds segment includes bonds issued by Russian issuers whose bond issue(s), investment project(s), or issuer's document(s) meet the internationally recognised Social Bonds Principles (SBP) of the International Capital Market Association (ICMA) and the Russian principles/standards for social financing and/or sustainable social projects established by the Securities Issuance Standards, provided that the issue, issuer, or project has received independent verification confirming compliance with these principles or standards.

The sustainability bonds segment may include bonds in relation to which the bond issue(s), investment project(s), or issuer's policy for raising funds has received independent verification confirming compliance with the following internationally recognised standards and documents:

- Green Bonds Principles (GBP) of the International Capital Market Association (ICMA) or the Climate Bonds Initiative (CBI)
- Social Bonds Principles (SBP) of the International Capital Market Association (ICMA)
- Russian Principles/Standards for Green and Social Financing and/or Sustainable Social Projects established by the Securities Issuance Standards

The national and adaptation projects segment may include bonds that meet the following requirements decision of a government body, official, or interdepartmental committee confirming alignment with the objectives and results of one of the following national projects: Environmental Protection, Housing

and Urban Environment, Comprehensive Plan of Modernisation and Expansion of Key Infrastructure, Demographics, Healthcare, Education, Labour Productivity and Employment Support, Culture, or Introduction of Best Available Technologies, independent verification confirming the project's compliance with the criteria (taxonomy) for adaptation projects, with the condition that it be financed with the proceeds from the bond placement

Listing rules

To be considered for inclusion in the Sustainability sector, issuers must submit:

- an application for inclusion in the sector;
- a certificate from an external verification body;
- a statement that the issuer undertakes to disclose information (no less than once a year throughout the lifetime of the bond) confirming that the funds raised are being put to appropriate use;
- for the national projects segment: a statement from a government body, official, or interdepartmental committee confirming that the offering, the issuer, or the investment project are consistent with the objectives and results of one of the national projects.

Key documents:

- [Listing Rules of Moscow Exchange](#)
- Social Bonds Principles (SBP)
- [Green Bond Principles of the International Capital Market Association, \(ICMA\), 2018](#)
- [Climate Bonds Standard of the Climate Bonds Initiative](#)
- [VEB.RF Taxonomy \(VEB.RF National Methodology for Green Financing\)](#)

Responsible body:

- Listing Department

ESG indices

3-3

The Responsibility and Transparency Index and the Sustainability Vector Index are calculated in accordance with the partnership agreement

signed in March 2019 between Moscow Exchange and the RSPP. The purpose of the partnership agreement is to develop and boost sustainable business practices among Russian issuers, improving their investment appeal and helping them become more transparent and trustworthy to investors.

The composition of the indices is reviewed annually through an RSPP analysis of the reporting of major Russian companies. The indices are released daily on the websites of Moscow Exchange and the RSPP, as well as through various news agencies.

Key documents:

- [Calculation Methodology for the MOEX ESG Indices](#)

Responsible body:

- Indices and Market Data Department

ESG ETFs

3-3

ESG ETFs construct their investment strategies and determine their asset structures based on the relevant sustainability stock indices of Moscow Exchange. By purchasing units of ESG ETFs, investors gain access to a diversified portfolio of the most successful Russian companies that adhere to the principles of sustainability. Investors can manage their units independently. ETFs are the most popular securities with retail investors around the world.

Key document:

- Rules for Trading on the Equity and Bond Market of Moscow Exchange

Responsible body:

- Equity Market Department

Growth sector

3-3

In 2017, Moscow Exchange launched the Growth sector in cooperation with the Bank of Russia and a number of other partners, including the Ministry of Economic Development of the Russian Federation, SME Corporation, and SME Bank.

The purpose of the sector is to help promising small and medium-sized enterprises raise capital. The primary objective of the sector is to facilitate the implementation of the 'Small and Medium-sized Entrepreneurship and Support of Individual Entrepreneurship Initiatives' national project. The sector already has a mature ecosystem that includes:

- a set of rules for entry to the sector, including a risk management system for vetting companies
- a set of partners (development institutions)
- a network of professional service organisations
- government support tools

The Growth sector of Moscow Exchange is supported by the government, per [Decree of the Russian Government No. 532, dated 30 April 2019](#), which provides for partial compensation of the costs of issuing shares and bonds and the costs of agreements on the assignment of a credit rating.

Measures to support companies in the Growth sector include:

- subsidies of up to 70% of the coupon rate;
- compensation of up to RUB 2.5 million for the issuer's costs on the placement of the securities;
- anchor investments from SME Bank, with an option that it act as the co-organiser of the offering;
- guarantees and endorsements for SME Corporation's bond offerings (up to RUB 1 billion);
- help from the territorial divisions of the Bank of Russia in organising events for issuers;
- waived listing fees for SMEs placing bonds of up to RUB 400 million up to the end of the year.

Listing rules

Listing rules for SMEs:

- The issuer must have been established at least three years prior to the issue.
- The issuer must have revenue of at least RUB 120 million. The maximum revenue must be less than RUB 10 billion for bond issuers and less than RUB 25 billion for issuers of shares.

For bond issuers:

- the minimum issue volume is RUB 50 million;
- there must be an assigned rating or support from development institutions (guarantees from SME Corporation or anchor investments from SME Bank).

Priority is given to:

- SMEs;
- companies showing growth in their financial results
- industrial companies;
- companies with export revenue;
- companies that have received support from SME Corporation, SME Bank, FRP, REC, or RDIF.

Company screening and risk management

Companies that wish to join the Growth sector must meet a number of criteria. Every new issuer must undergo KYC (Know Your Customer) procedures that include a review by experts from departments of Moscow Exchange who vet every applicant against a set of risk parameters. If the review reveals any potential risks, the issuer's file is forwarded to the Growth Sector Board Committee, which then makes a final recommendation.

Many small and medium-sized businesses joined the Growth sector after receiving support from our partners, such as guarantees and endorsements from SME Corporation, anchor investments from SME Bank, or a subsidised coupon rate (which significantly reduces the likelihood of default).

Innovation and investment market

3-3

The Innovation and Investment Market of Moscow Exchange was launched in 2009 to attract investments to the innovative sector of the Russian economy.

Key document:

- Rules for Classifying Shares and Bonds of Russian Organisations, as well as Investment Units Circulating on the Organised Securities Market as Securities of the High-tech (Innovative) Sector of the Economy ([approved by Decree of the Russian Government No. 156, dated 22 February 2012](#))

Responsible bodies:

- Managing Director for Relations with Issuers and Authorities
- Committee for Development of the Innovation and Investment Market
- Innovation and Investment Market Coordination Council

Listing rules

Key listing requirements:

- market capitalisation of at least RUB 500 million;
- business areas: telecommunications, internet, software, development and production of semiconductor devices, biotechnology, pharmaceuticals, high-tech, knowledge-based technologies, new materials, energy efficiency, etc.;
- credit rating assigned to the issuer and/or its bond issue by one of the approved ratings agencies
- securities prospectus drawn up in line with Russian laws and information disclosure standards
- investment memorandum containing detailed information about the company's financial and operational activity and the main goals and plans for delivering potential growth.

The innovative segment requires the involvement of a listing agent (i.e., an advisory, broker, or investment company accredited by Moscow Exchange).

Measures to support companies in the IIM sector:

- marketing and promotion programmes for issuers conducting IPOs/SPOs;
- attraction of investors targeting companies of the given type;
- IR services and tools: presentations for investors, roadshows, webinars;
- information and analytical coverage based on monthly IIM reports;
- access to pension savings: according to Bank of Russia Regulation No. 580-P, up to 5% of the portfolio of pension savings of NPFs can be invested in shares of issuers included in the IIM-Prime segment;
- tax incentives for investors.

Carbon unit market

3-2

Moscow Exchange believes that the creation of a voluntary market for carbon units is a key step in the creation of real economic incentives for decarbonisation projects as part of the Russian Federation's commitments under the Paris Climate Agreement, adopted on 12 December 2015 by the 21st session of the Conference of Parties to the United Nations Framework Convention on Climate Change. The project is also important in maintaining the competitiveness of exporting companies. The transition to a low-carbon economy requires an interim adaptation phase in which climate projects serve as an emissions regulation tool. Their implementation results in the generation of carbon units, the market for which contributes to the harmonisation of economic relations among the commodity market players subject to international agreement on the rules of the new turnover mechanisms.

3-3

Key document:

- Federal Law No. 296-FZ, dated 2 July 2021 'On Limitation of Greenhouse Gas Emissions' provides for the creation of a registry of carbon units to be operated by a legal entity authorised by the Government of the Russian Federation.

After addressing the issue, the Ministry of Economic Development and Trade of the Russian Federation and Moscow Exchange have proposed the establishment of an infrastructure for the operator of a carbon accounting registry. The operator was established on the basis of Kontur JSC, an existing legal entity.

In the creation of a carbon unit registry operator, Moscow Exchange will have the following tasks:

- assisting the operator in supporting the operational processes of the operator's platform;
- participating in the development of methodological and regulatory documents regulating the operator's operational processes, interaction with registry customers, as well as with state bodies and international organisations;
- developing proposals for the operator's participation in carbon unit trading and implementing such proposals together with other parties.

Carbon project and carbon unit registration process

A set of measures providing for the reduction (avoidance) of greenhouse gas emissions or their increased absorption can be a climate project. The project shall meet the following criteria to be recognised as a climate project:

1. It is consistent with federal and regional law on the territory where the project is implemented and carried out pursuant to the documents of the national standardisation system for limited greenhouse gas emissions.
2. It does not result in increased greenhouse gas emissions or their reduced absorption outside the project.

3. It is supplementary to measures targeting compliance with the mandatory requirements of Russian law effective as of the start of the project.
4. It is not a result of reduced production.
5. The reduction (avoidance) of greenhouse gas emissions and/or their increased absorption within the project implementation period is not a result of factors unrelated to the project activities.
6. Climate projects include low-carbon energy, resource conservation, efficient waste management, sustainable agriculture, and reforestation projects.

The project shall be registered in the carbon unit registry prior to its actual implementation.

To issue carbon units into circulation, it is necessary to:

- 1) register the climate project in the carbon unit registry;
- 2) submit an application for the issue of carbon units from an individual account on the Public Services (Functions) Portal of the Russian Federation with the following documents attached to it:
 - a document certifying the powers of the climate project manager, contractor, or other authorised person who has signed the application for the issue;
 - a verification report;
 - the application for the issue with enclosed documents must be signed with an enhanced encrypted and certified digital signature and sent to the operator;
- 3) submit an order to credit the carbon units to the account of the climate project contractor upon receipt of notification of the issuance of carbon units;
- 4) pay the service.

Carbon unit and quota fulfilment unit

A **carbon unit** is a verified result of the implementation of a climate project expressed as a mass of greenhouse gases equivalent to one tonne of carbon dioxide.

A **quota fulfilment unit** is a verified result of the fulfilment of a set quota expressed as the difference between the set quota and the actual mass of greenhouse gases emitted, quoted in equivalent tonnes of carbon dioxide.

Climate project verification

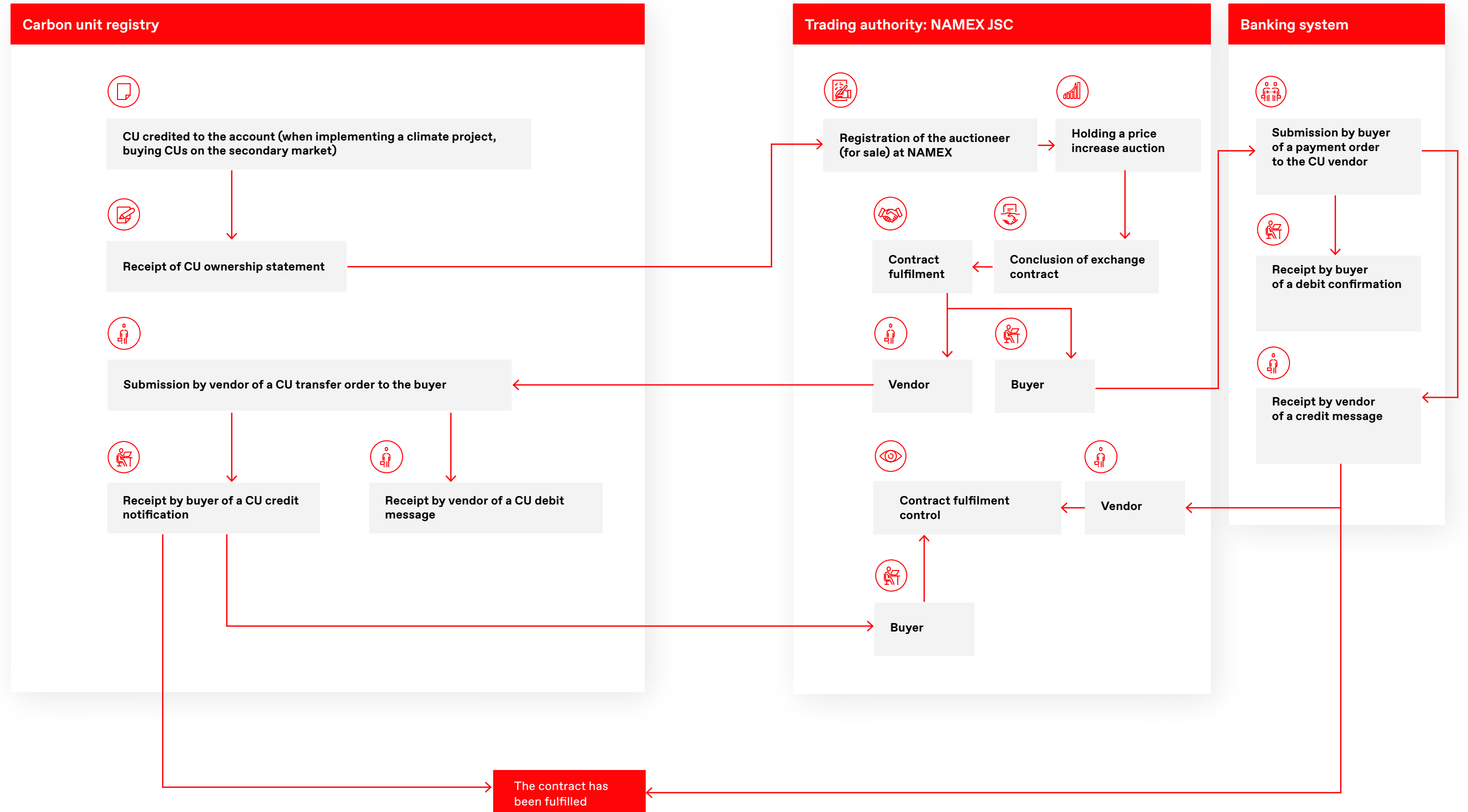
Project verification is a process of evaluating and verifying the calculation of the number of carbon units issued. It must be carried out by a person accredited by the Russian Federal Service for Accreditation (RusAccreditation). The report is generated using the results of the implementation of a climate project verified in accordance with Part 5 of Article 9 of the Federal Law 'On Limitation of Greenhouse Gas Emissions' with a positive conclusion from the accredited person on the verification of the results of the implementation of the climate project (verification report).

The verification report shall be submitted together with the application for the issue of carbon units.

Carbon unit sale in commodity auction

To effect the sale and purchase of carbon units in a commodity auction on the National Mercantile Exchange, the vendor shall provide Moscow Exchange with an extract from the carbon unit registry issued to the applicant/bidder by the legal entity maintaining the carbon unit registry in accordance with the effective law of the Russian Federation which certifies the rights of the applicant/bidder to a minimum of 50 carbon units and/or quota fulfilment units.

Carbon unit (CU) trading scheme



T | TRUSTED RELATIONS WITH LOCAL COMMUNITIES

Financial literacy improvement activities

3-3 203-1 203-2 413-1

Improving the financial literacy of novice investors is a priority of Moscow Exchange Group's ESG strategy. In pursuing this objective, Moscow Exchange can make a significant contribution to achieving its sustainability goals.

Investing is an activity that professional portfolio managers, traders, and the public engage in to develop the modern economy. This includes green financial instruments, which have not only environmental, but also social effects. The successful ESG transformation of financial markets largely hinges on the availability of training for market participants.

To make investment activities more attractive to individual investors and to raise their awareness of the ESG agenda, Moscow Exchange conducts specialised activities, training seminars, and competitions, as well as large-scale financial education projects. It also organises contests to demonstrate the benefits of an informed approach to trading.

- The [Moscow Exchange School](#) has been running since 2014. The materials, video courses, and webinars published on the project's web page help novice and experienced investors understand the stock exchange and how to settle trades effectively and with confidence.
- The [Investor's Path training course](#): Moscow Exchange has developed a free training course for novice investors based on the methodology of the International Organization of Securities Commissions (IOSCO). The course is accredited by the Financial Literacy Association.
- The Best Individual Investor contest has been held since 2003 and is the world's largest exchange competition for traders.
- Moscow Exchange is the general partner of [Fincontest](#), or the All-Russian Financial Markets Knowledge Contest, which has been held annually by the Financial University under the Government of the Russian Federation since 2009.
- Moscow Exchange Group supports projects of the Bank of Russia and the Russian Ministry of Finance to develop financial skills and awareness and improve the financial literacy of the public.

The following activities to improve financial literacy were held in 2022:

- webinars for individual investors;
- contests and 'marathons' (Investmarathon, Invest Battle Championship);
- development and promotion of educational content via the MOEX – Moscow Exchange and Moscow Exchange School Telegram channels and the Money Makes Money podcast.

Key document:

- Strategy for the Improvement of Financial Literacy in the Russian Federation 2017-2023.

Responsible bodies:

- Strategy Department
- Business Development Department
- Department of marketing, PR and services
- Equities Market Department
- Issuer Relations Department

Promoting gender balance and equality in the professional community

Moscow Exchange Group is a party to the global Ring the Bell for Gender Equality initiative. Every year on 8 March, participating exchanges ring bells at the opening or closing of trading as a gesture to promote the principles of gender equality and the empowerment of women in business, politics, and the economy. The main goal of this initiative is to urge businesses to take measures to promote sustainability goals through the empowerment of women. In particular, the role of exchanges involves the promotion of gender equality at companies whose shares are listed on their floors and in calling for adherence to the Women's Empowerment Principles (WEP).

Information about Moscow Exchange Group's adherence to the principles of non-discrimination and gender equality among its employees is provided in the [Respect for Human Rights, Equal Opportunities and Staff Engagement subsection of the 2022 Sustainability Performance Highlights section of the Report](#).

Key documents:

- Code of Professional Ethics of Moscow Exchange
- ILO Conventions No. 111 and No. 156
- UN Universal Declaration of Human Rights

Responsible bodies:

- Internal Control and Compliance Department
- Corporate Communications Department

Investments in communities and charity projects

203-1 203-2 413-1

Moscow Exchange's charity activities aim to address important social issues in areas where it has strong competencies or strategic interests. It also sponsors external projects to strengthen relationships with customer groups and professional and business communities and to develop the Russian financial market. The Group's largest corporate donors are Moscow Exchange and the National Settlement Depository.

Moscow Exchange develops, selects, and implements charity programmes and projects in accordance with the following documents:

- Regulation on the implementation of charitable activities, which defines the principles, priority areas and procedures for interaction with partners;
- Regulation on the Charity Policy Committee;
- Regulation on the Charity Commission of the National Settlement Depository (updated in 2022);
- Corporate Social Responsibility Programme of the National Settlement Depository for 2021-2023 (updated in 2022).

Priority areas of the charity programmes in 2022 include:

- support for Russian medicine;
- support for education and financial literacy;
- helping children, people in need of in difficult circumstances;
- supporting veterans and elderly.

Moscow Exchange set new priorities for its charitable activities in the beginning of 2022:

- educational initiatives for people of all ages aimed at improving the financial, investment, and technological literacy of the public;
- support for educational institutions at all levels, educators and students (e.g., through grants and scholarships), research and popular science, and publications in the fields of finance, economics, and technology;
- assisting children, the economically disadvantaged, people who have found themselves in difficult situations (by helping them get back to an active life and find a decent job), and WWII veterans;
- programmes that promote environmental stewardship among companies and individuals. programmes that protect biodiversity and encourage the development of renewable energy sources;
- programmes that raise awareness among individuals and organisations of the importance of socially responsible behaviour and participation in charitable activities;
- corporate volunteering, i.e., the involvement of Group employees in charitable activities, which includes cash donations by employees.

A Charity Committee has been established. It is responsible for planning, analysing, and evaluating projects, as well as for issuing opinions and recommendations to the Executive Board and the Chairman of the Executive Board of Moscow Exchange when selecting applicants to participate in charity programmes.

413-1

The effectiveness of charitable activities is evaluated using feedback from partners and beneficiaries. Feedback is obtained via email in the form of reports from the charities involved.

Moscow Exchange cooperates with a number of reputable charitable foundations, thereby ensuring the transparency and effectiveness of the allocated funds while also increasing the number of end beneficiaries.

New projects are considered by the Charity Policy Committee based on the following criteria:

- alignment with Moscow Exchange's strategic priorities;
- significance in achieving the UN Sustainable Development Goals, national priorities, and other initiatives and partnerships in which Moscow Exchange is a member;
- the positive impact of the charity programmes;
- the ability of the beneficiaries to continue to make qualitative changes after the programme's completion;
- the absence of compliance risks and negative information about the beneficiaries.

Moscow Exchange seeks to ensure that all of the Group's companies act in accordance with the Charity Policy and harmonise the principles and approaches used in their charitable activities with it.

Moscow Exchange does not support organisations that discriminate based on gender, sexual orientation, or nationality, nor does it participate, directly or indirectly, in financing organisations whose activities involve human rights violations, the creation or proliferation of weapons of mass destruction, or projects that pose a risk of environmental pollution.

Key documents:

- Regulation on Sponsorship and Financing of External Projects by Moscow Exchange
- Regulation on the Charity Policy Committee
- Regulation on Sponsorship by Moscow Exchange

- Regulation on the Moscow Exchange Sponsorship Committee
- Regulation on the Charity Commission of the National Settlement Depository

Responsible bodies:

- Charity Policy Committee of the Moscow Exchange Executive Board
- For charity programmes with budgets exceeding RUB 10 million, relevant opinions, proposals, and recommendations are submitted to the Moscow Exchange Executive Board for consideration

Corporate volunteering

Volunteering is an important aspect of the corporate culture of Moscow Exchange Group: it brings staff together by fostering common values. Moscow Exchange employees can participate in partner projects as volunteers or donors.

Employee participation in charitable projects is encouraged, including by the use of an internal 'currency' ([the description of the MEMS project is provided in the Respect for Human Rights, Equal Opportunities, and Staff Engagement subsection on p. 115](#)).

Employees receive information about charity events in the weekly Company News morning newsletter. They can also find out about charitable activities on the special Corporate Charity page on the intranet. There, staff can apply to participate in volunteer events, make donations, or post announcements about alternative charitable projects to find like-minded people.

Interaction with stakeholders, partnerships, and associations

2-29 413-1

Moscow Exchange Group actively works to build constructive dialogue with Russian and foreign investors, market participants, current and potential issuers, regulators, and professional communities. It pursues this by engaging in direct communication through advisory bodies, working groups, investment conferences, forums, and specialised training events. These efforts help attract new investors to the Group's markets, thereby expanding the client base, increasing the liquidity of financial markets, and bringing an inflow of investment to the Russian economy.

Many areas of Moscow Exchange's activities involve interaction with government authorities. These relations are supervised by the Managing Director for Interaction with Issuers and Government Authorities.

Key documents:

- AA1000 AP AccountAbility Principles
- AA100 SES AccountAbility Principles
- Regulation on the Exchange Council

Responsible bodies:

- Strategy Department
- Corporate Communications Department
- Personnel and HR Policy Department
- Chief Operating Officer (COO)
- Managing Director for Interaction with Issuers and Government Authorities
- Head of Investor Relations

Moscow Exchange Council and user committees

The Moscow Exchange Council is the organisation's main consultative and advisory body. Its objective is to elaborate strategic proposals for developing the Russian financial market and to represent trade participants and consumers of Moscow Exchange's services so that their needs can be fully taken into account. The Moscow Exchange Council is made up of members of the management of leading market participants, the heads of self-regulating organisations, and representatives of management companies, investment banks, and the Bank of Russia.

The Moscow Exchange Council has the following competencies:

- elaborating proposals and providing recommendations to the Supervisory Board on how to improve Moscow Exchange Group's development strategy;
- discussing priority projects and selecting at least one project to be used as a KPI for the management of Moscow Exchange, as well as providing relevant recommendations to the Supervisory Board or other competent management bodies;
- developing proposals to improve Moscow Exchange's infrastructure and clearing technologies and to attract market participants from new client segments and other areas and providing recommendations to the Supervisory Board or other competent bodies.

Moscow Exchange Group interacts with market participants via user committees. Through these committees, Moscow Exchange Group receives feedback from clients on planned innovations to products and services, improves its exchange infrastructure, and prepares proposals for amending financial market regulations.

The user committees are advisory bodies made up of stakeholder representatives. Committee members give recommendations to the management bodies of Moscow Exchange on its strategic development and operations in certain markets. The user committees and the Moscow Exchange Council were created pursuant to Federal Law No. 325-FZ, dated 21 November 2021, 'On Organised Trading'.

As of 31 December 2022, Moscow Exchange had the following user committees:

- Committees created pursuant to legislative requirements:
 - Foreign Exchange Market Committee
 - Derivatives Market Committee
 - Repo and Securities Lending Committee
 - Stock Exchange Committee
 - Fixed-Income Securities Committee
 - Deposit Market Committee
 - Credit Market Committee
- Committees created on the initiative of Moscow Exchange:
 - Exchange Council
 - Settlements and Transaction Documentation Committee
 - Collective Investment Market Committee
 - Share Issuers Committee
 - Bond Issuers Committee
 - Primary Market Committee
 - Index Committee
 - Debt Market Indicators Committee
 - Information Technology Committee
- Committees under the National Settlement Depository:
 - Quality and Risk Committee
 - Committee on Settlement and Depository Activities and Tariffs
 - Committee on Interaction with Registrars and Depositories
 - Central Depository Services Users Committee
 - Repository Services Users Committee

Most committees include members who are professional market participants: banks, brokers, investment companies, issuers, and non-finance companies. They are appointed for terms of one year.

Members prepare proposals for amending legislation and improving the regulatory framework, and they also review issues of the regulation of the public circulation and issuance of securities, information disclosure, and corporate governance. The committees also elaborate proposals for process solutions

to improve the organisation of exchange trading, clearing and settlements, and the expansion of tools and services.

For the convenience of everyone involved, Moscow Exchange publishes a monthly user committee digest containing a list of the issues considered at meetings of the Exchange Council and the user committees, as well as the decisions taken. Information on the work of the committees is available to the public on the websites of [Moscow Exchange](#) and the [National Settlement Depository](#).

Sustainability initiatives and partnerships

2-28

In keeping with its mission and corporate values, Moscow Exchange actively participates in various Russian and international organisations, associations, and voluntary initiatives.

- Moscow Exchange is a regular participant in the Ring the Bell for Financial Literacy initiative of the World Federation of Exchanges. It also participates in the global SSE initiative, which was launched in 2009 on the initiative of former UN Secretary-General Ban Ki-moon. It is a partner programme of the UN Conference on Trade and Development (UNCTAD), the UN Global Compact network, the UN Environment Programme Finance Initiative (UNEP FI), and the Principles of Responsible Investment (PRI).
- Moscow Exchange Group actively participates in numerous working groups on sustainable financing and responsible investing together with other market participants and regulators. One example is the initiative to encourage best practices in business ethics, compliance, and anti-corruption by the Russian Association of Business Ethics and CSR (Russian Business Ethics Network, RBEN).

Interaction with market participants and regulators

Moscow Exchange Group holds conferences, roundtable discussions, and seminars involving various partners from the corporate and public sectors. At these events, participants discuss legislative developments, IR trends, and topics pertinent to sustainability.

Key events in the field of corporate governance and investor relations include a yearly annual report competition, which is held by Moscow Exchange together with the RCB media group. The competition contributes to increasing the transparency of public companies and making disclosures more useful to investors and customers.

Support for political parties and organisations

3-3 415-1

Moscow Exchange Group maintains a neutral position when it comes to political and religious activities, but it does not impinge upon its employees' right to choose their own views, nor does it prevent them from pursuing such activities at their own cost and as private individuals. The Group made no donations to any political organisations in 2022.

Developing partnerships with institutions of higher education

Moscow Exchange works with leading universities to ensure the availability of highly skilled, well-trained personnel for the Group and the financial industry. It also works to promote research projects in the fields of economics and technology.

Moscow Exchange cooperates closely with the Higher School of Economics, the New Economic School, Lomonosov Moscow State University, the Financial University under the Government of the Russian Federation, Plekhanov Russian University of Economics, and the MEPhI National Research Nuclear University. Together with these institutions, Moscow Exchange conducts research on the securities market, IT, and risk management. It creates special software to train young specialists.

Through career guidance programmes, students are given the chance to apply for internships at Moscow Exchange Group in their fields of interest. Group employees help them implement their projects. Information on internships at Moscow Exchange Group is published on its careers page. The Group also actively develops special educational programmes in which senior managers and leading specialists of the Group's companies offer master classes for students.

In 2018, with the support of Moscow Exchange, the Higher School of Economics created the Department of Financial Market Infrastructure in its Faculty of Economics, which brings together HSE professors and employees of Moscow Exchange. Moscow Exchange also helps the Financial University run its Securities and Financial Engineering master's programme. Sponsor support is provided to the Cybernetics Department of the Institute of Intelligent Cybernetic Systems at MEPhI National Research Nuclear University, which, in turn, implements the department's curricula and consults with students on their diploma projects and research in the interests of Moscow Exchange.

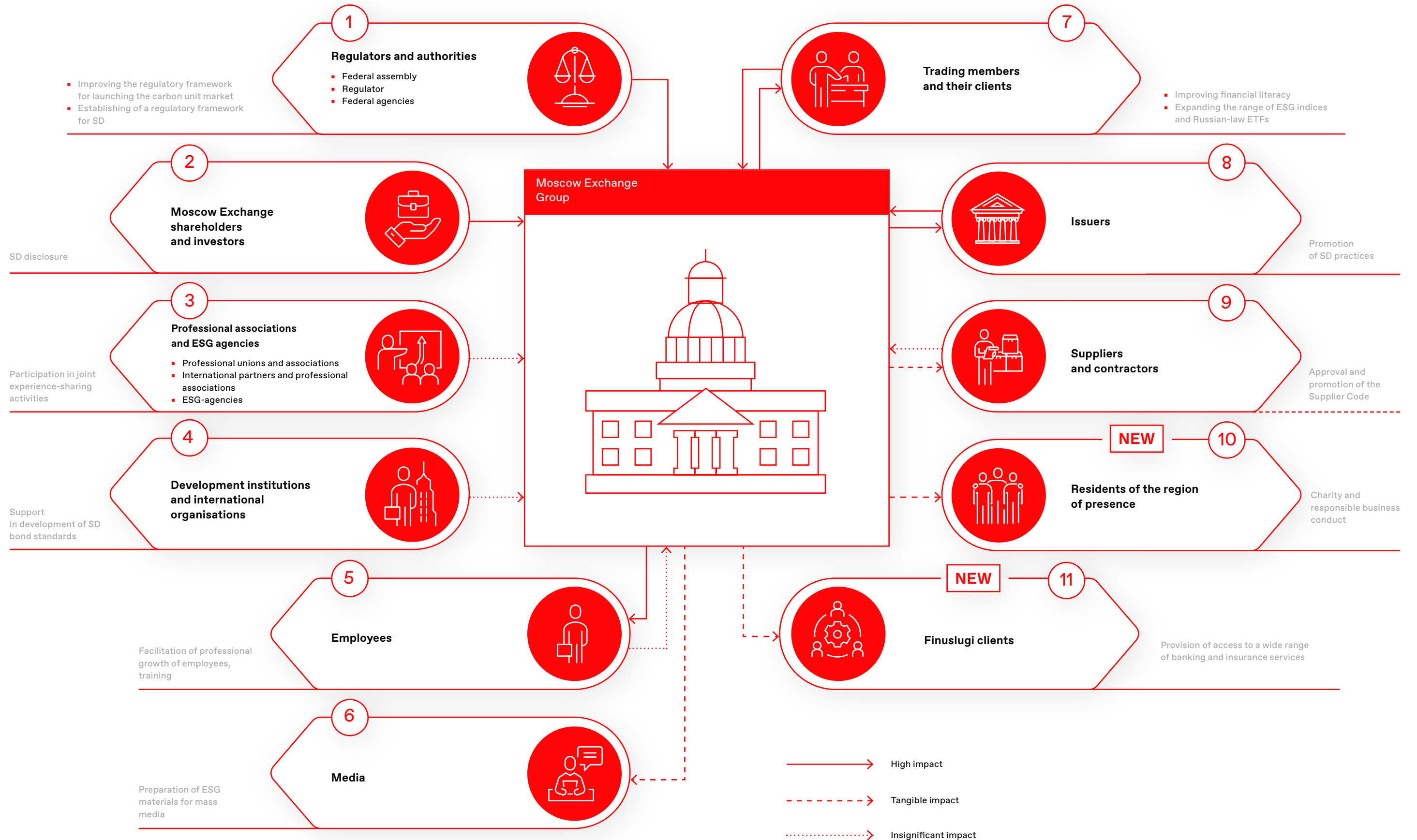
Together with the Financial University, Moscow Exchange organises Fincontest, a specialised knowledge contest about financial markets that was launched several years ago. Moscow Exchange helps assess participants' knowledge in the areas of corporate finance, the securities markets, and financial analysis. It provides contestants with the chance to begin their professional careers.

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Stakeholder groups, areas, and forms of interaction

A stakeholder survey is conducted to rank material topics and prepare sustainability reports. The last stakeholder survey was conducted in 2020. Moscow Exchange conducted the following surveys in 2022, and their results provided feedback on the level and themes of Moscow Exchange's impact on stakeholders:

- survey of issuers' awareness of sustainability issues and perceptions of the products and services in Moscow Exchange's Sustainability Sector;
- assessment of Moscow Exchange Group's Customer Satisfaction Index (CSI);
- staff engagement assessment.



Item	Stakeholder group	Key topics for engagement	Forms of engagement
1	Regulators and authorities: - Bank of Russia - Russian Federal Assembly and Russian government and federal government authorities	Preparation of bills for financial market regulation Preparation of draft regulatory provisions governing the financial market and the development of corporate governance Control and oversight of financial markets, including the activities of the market operator, by the Bank of Russia	Preparation and provision of analytical materials on the development of the financial market. Preparation, submission, and support of proposals for amendments to the Bank of Russia's statutory acts regulating the activities of market operators, clearing organisations, and the central counterparty. Participation in meetings of expert councils and working groups on the development of the financial market. Regular reporting in accordance with the requirements for market operators
2	Moscow Exchange shareholders and investors controlling shareolders and portfolio investors	Corporate governance and exercise of shareholders' rights. Development of the business of Moscow Exchange Group	Interaction involving the presentation of information and analytics at conferences and road shows, and through conference calls and webinars. Participation by stakeholders in the exercise of their shareholder rights and in corresponding corporate governance processes
3	Professional associations and ESG-agencies: National Association of Stock Exchange Participants, National Finance Association, Russian Union of Industrialists and Entrepreneurs, SSE, and Russian and foreign ESG-agencies	Cooperation on development of financial market regulation Improvement of financial literacy	Joint events for financial market participants and consultations on regulatory initiatives in financial market development. Support for activities to improve financial literacy. Exchange forums, participation in conferences, and implementation of joint projects. Development and perfection of methodologies of ESG indices
4	International organisations and development institutions: Eurasian Economic Commission, SME Corporation, VEB.RF State Corporation, Russian Direct Investment Fund, etc.	Interaction with regard to regulation and development of financial markets Development of corporate governance practices Cooperation on implementation of state development policy Attraction of investment for development projects	Participation in joint activities to share experience and to discuss issues and proposals related to the regulation and development of financial markets and corporate governance. Issuance of bonds by development institutions. Cooperation on the development of the IIM, the Growth sector, and the sustainability sector
5	Employees	Working conditions, incentives, personnel management, and staff training processes. efficiency and cross-functional interaction	Creation of conditions for the professional growth of employees Training
6	News agencies and the media	Transparency of relations and provision of relevant information in a timely manner. Moscow Exchange Group news, listing rules, and market news. Disclosure of information by issuers	Awareness-raising events. Distribution of press releases and newsletters
7	Market participants and their clients: brokers, investment banks, legal entities, and individuals participating in market activities	Provision of information on trading at Moscow Exchange and reporting on the results of trading for market participants. Discussion of growth areas and new tools. Providing information on trading at Moscow Exchange, products, quotes, the trading calendar, and training	Participation by appropriately licenced legal entities in trading on Moscow Exchange markets Customer service, including KYC (Know Your Customer) procedures, information on products and services, participation in user committees, and use of Moscow Exchange software. Provision by Moscow Exchange of the current list of traders, quotes, the trading calendar, products, and training for private investors Conducting activities to improve financial literacy

Item	Stakeholder group	Key topics for engagement	Forms of engagement
8	Issuers	Issuers raising capital on Moscow Exchange markets. Assurance of issuers' compliance with listing rules	Provision of direct access to Foreign Exchange, Money, and Bond Markets. Information of potential issuers about financing opportunities. Interaction regarding disclosure by issuers. Issuers' participation in user committees. Joint activities
9	Suppliers and contractors	Procurement procedures. Promotion of competition. Development of new products and services. Requirements for vendors and contractors, responsible supply chains	Creation of transparent conditions for participation in the procurement process. Tenders and conclusion of transactions with vendors and contractors. Fulfilment of contractual obligations
10	Residents of region of presence	Charity and sponsorship programme. Financial literacy programme. Payment of taxes	Charitable and sponsorship assistance. Knowledge from participation in educational and professional events, etc. Moscow Exchange and its employees' role as taxpayers
11	Finuslugi client	Access to financial services. Access to products for retail clients	Provision of access to a wide range of banking and insurance services. Development of special products for retail clients

Participation in initiatives and associations in 2022

2-28

Moscow Exchange Group Company	Name of Initiative/Association
Sustainability initiatives	- UN Global Compact (support of the principles) - UN Sustainable Stock Exchanges (SSE) initiative - Ring the Bell for Gender Equality - Ring the Bell for Financial Literacy - CPMI-IOSCO Principles for Financial Market Infrastructure (evaluation of conformity to the principles for Group companies) - Association for Improvement of Financial Literacy
Other significant associations and initiatives	- International Association of Exchanges of the CIS - Russian National SWIFT Association (ROSSWIFT) - Financial Technology Development Association
NATIONAL SETTLEMENT DEPOSITORY	- Association of Eurasian Central Securities Depositories (AECSD) - Russian National SWIFT Association (ROSSWIFT) - Self-Regulated Organization National Finance Association (SRO NFA)

APPENDICES

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APPENDIX 1. STATEMENT OF MOSCOW EXCHANGE ON COMPLIANCE WITH THE PRINCIPLES OF THE UN GLOBAL COMPACT

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As of 2022, Moscow Exchange is not a party or a signatory to the UN Global Compact (UNGC). Nevertheless, it adheres to the 10 principles set forth in it. Moscow Exchange strives to ensure respect for human rights and fair working conditions. Furthermore, it works to prevent corruption in all forms and to promote environmental protection in regions where it has a presence.

UN Global Compact principle	Position of Moscow Exchange and measures taken to support the principles	Relevant regulatory documents and initiatives of Moscow Exchange
Human rights Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights Principle 2: Businesses should make sure that businesses are not complicit in human rights abuses	Moscow Exchange carries out all its activities in accordance with the Constitution of the Russian Federation. It has also ratified and implements international agreements on the protection of human rights. Moscow Exchange does not participate directly or indirectly in the financing of organisations whose activities involve human rights abuses. Moscow Exchange takes measures to protect employees from verbal and non-verbal harassment, discrimination on any grounds, humiliation, and threats in any form. Human rights risks are included in the risk management system and are regularly evaluated when the risk map is updated. Moscow Exchange Group also regularly assesses the risk of human rights abuses associated with data confidentiality. To evaluate such risks, it uses proprietary methodology for assessing risk appetite. The main tool for detecting and preventing human rights abuses is the Speak Up! hotline, which is available to employees of the Company. There is also a publicly available hotline on the Moscow Exchange website that any stakeholder can use to report human rights abuses committed by companies of the Group. Should there be any cases of human rights abuse in the course of Moscow Exchange’s activities, it is obliged to take measures to rectify them. The Risk Management Commission of the Supervisory Board and the Internal Audit Service are the main structural units that monitor human rights indicators at the Group	Code of Professional Ethics of Moscow Exchange

UN Global Compact principle	Position of Moscow Exchange and measures taken to support the principles	Relevant regulatory documents and initiatives of Moscow Exchange
Labour Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour Principle 5: Businesses should uphold the effective abolition of child labour Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation	Moscow Exchange recognises the rights of its employees to enter into collective agreements, exercise freedom of assembly and association, establish organisations representing their interests, and join them without fearing any consequences. The staff of Moscow Exchange Group have not formed a trade union; therefore, the Group does not consult with trade unions in the course of its activities. Nevertheless, Moscow Exchange supports the right of employees to protect their legitimate labour rights and interests. In the event of labour or human rights abuses, employees may use the hotline or contact the managers of the Group’s companies. Moscow Exchange adheres to high standards of labour protection and provides its employees with a safe and comfortable workplace. Moscow Exchange upholds the principles of diversity and equal opportunity; it respects diverse cultures, opinions and lifestyles. Moscow Exchange prohibits all affronts to human dignity, aggression, and the use of child, forced, or compulsory labour. Moscow Exchange does not tolerate any form of discrimination based on gender, religion, personal belief, ethnicity, nationality, physical ability, gender identity, skin color, marital status, political views, or affiliation with any particular social group. Moscow Exchange is not involved in any activity that could contribute to a workplace atmosphere conducive to intimidation, hostility, abuse, or abasement of human dignity. The Exchange regularly conducts employee satisfaction surveys to assess working conditions; such surveys can also be used to bring interpersonal issues to light. The Exchange informs employees about its human rights approaches by posting the relevant information on the intranet. It also circulates newsletters on the topic and holds relevant training. The employment policies of the Group’s companies comply with the labour laws of the Russian Federation. Russian laws prohibit forced, compulsory or child labour. Moscow Exchange strictly complies with the minimum wage requirements established by Russian law. Employees’ entry-level compensation is higher than the minimum wage in the regions where the Group has a presence. The Group encourages contractors with whom it interacts to adhere to the ethical principles set out in the Code of Professional Conduct, including those that relate to human rights.	Code of Professional Ethics of Moscow Exchange Code of Professional Conduct Social Responsibility Memorandum

[Detailed information is available in this Report in the Respect for Human Rights, Equal Opportunities and Staff Engagement subsection.](#)

UN Global Compact principle	Position of Moscow Exchange and measures taken to support the principles	Relevant regulatory documents and initiatives of Moscow Exchange
Environment Principle 7: Businesses should support a precautionary approach to environmental challenges Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies	Moscow Exchange shares responsibility for the state of the environment and the rational use of natural resources. It supports a precautionary management approach and takes measures to reduce the negative impact of its activities on the environment. Moscow Exchange takes measures to reduce the ecological footprint of its activities. It helps search for solutions to environmental problems in its interactions with business partners, supervisory authorities, and other financial sector participants. Every year, measures are planned and implemented to reduce energy and water consumption, as well as to collect and dispose of waste. Moscow Exchange offers customers various ESG products that comply with responsible investment principles. <u>Detailed information is available in this Report in the Resource Efficiency and Environmental Impact subsection</u>	<u>Moscow Exchange Environmental Policy</u> Programme for Industrial Environmental Control of Moscow Exchange Green Bond Segment of the Sustainability sector
Anti-corruption Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery	Moscow Exchange has a zero-tolerance policy regarding all forms of corruption. The Internal Control and Compliance Department is responsible for general management of corruption risks. Moscow Exchange uses the Speak Up! hotline to receive anonymous reports from employees on compliance issues, including alerts about possible instances of corruption. Persons outside the Group can report violations through Moscow Exchange's <u>website</u>. The identity of anyone who makes such a report is kept confidential. The policy of Moscow Exchange precludes retaliatory measures against such persons by management and in other forms. The principles of anti-corruption and professional ethics also apply to suppliers and partners of Moscow Exchange. Moscow Exchange includes provisions on anti-corruption and/or professional ethics in the contracts with its business partners. <u>Detailed information is available in this Report in the Genuine Corporate Governance and Business Ethics subsection</u>	<u>Code of Professional Ethics of Moscow Exchange</u> <u>Anti-Corruption Policy</u> Policy on Whistle-blowing and Non-retaliation Guarantee

APPENDIX 2. STATEMENT OF MOSCOW EXCHANGE ON RESPECT FOR HUMAN RIGHTS AND COUNTERACTING MODERN SLAVERY

409-1

INTRODUCTION

Moscow Exchange recognises that slavery remains a problem in the modern world. In support of initiatives to stop modern slavery, including the UK's Modern Slavery Act 2015, Moscow Exchange issues this statement setting out the actions it has taken to prevent any form of modern slavery within Moscow Exchange Group and its supply chains.

This statement also aims to confirm Moscow Exchange's position that its business partners must not commit any abuses of human rights in their activities.

Moscow Exchange strives to comply with the UN's Guiding Principles on Business and Human Rights.

BUSINESS OF MOSCOW EXCHANGE

Moscow Exchange operates the only comprehensive exchange platform in Russia for trading equities, bonds, derivatives, currency, money market instruments, and commodities. Moscow Exchange Group includes a central depository (the National Settlement Depository) and a clearing centre (the National Clearing Centre), allowing Moscow

Exchange to provide customers with full-cycle trading and post-trading services. More than 22 million private investors are registered with Moscow Exchange. The head office of Moscow Exchange is located in Moscow, Russian Federation. Moscow Exchange and its subsidiaries employ over 2,000 people.

MOSCOW EXCHANGE’S APPROACH

The activities of Moscow Exchange comply with all applicable human rights laws, and the Group upholds high standards of ethical conduct. Moscow Exchange affirms that it takes a zero-tolerance approach to modern slavery and human trafficking. Provisions to this effect are contained in the Code of Professional Ethics as well as other policies and procedures that regulate its position on these issues.

Moscow Exchange supports Conventions No. 111 and No. 156 of the International Labour Organization and respects the cultures, opinions, and lifestyles of all

employees. It does not take part in any actions that could contribute to a workplace atmosphere conducive to intimidation, hostility, abuse, or abasement of human dignity.

Moscow Exchange communicates information about its approach to suppliers by posting relevant documents on its [website](#). The Supplier Code of Business Conduct is currently being developed to address human rights requirements.

RISK ASSESSMENT

Given the technical nature of its business, the risk of Moscow Exchange participating in any business practices that involve human trafficking or modern slavery is low. Moscow Exchange is not aware of any cases that could be deemed an abuse of human rights in its own activities or in those of its subsidiaries and suppliers.

The IT support services, namely development, maintenance and procurement of software and hardware, hold the dominant position in the Moscow Exchange’s procurement structure.

COMMUNICATION AND TRAINING

At Moscow Exchange, all employees undergo regular training on the approaches, values and principles of professional ethics of the Group.

The Group has a hotline that can be used by any employee to report violations of the Code of Professional Ethics or other compliance

incidents. Whistle-blowers receive a response in full anonymity. The hotline is also available to persons outside the Group, including individuals who work at companies that are part of Moscow Exchange’s supply chain and its business partners.

APPENDIX 3. GRI CONTENT INDEX

Statement of use	Moscow Exchange has prepared the Sustainability report in accordance with the GRI Standards based in GRI 1: Foundation (2021) for the period from 1 January 2022 to 31 December 2022
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Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
GRI 2: General Disclosures (2021)					
The organization and its reporting practices					
2-1	Organizational details	Overview of Moscow Exchange Group’s reporting suite 2022 Sustainability Performance Highlights Moscow Exchange Group Profile	<u>4</u> , <u>21</u>		1
2-2	Entities included in the organization’s sustainability reporting	Overview of Moscow Exchange Group’s reporting suite	<u>4</u>	The reporting boundaries include the following entities of Moscow Exchange Group: Moscow Exchange, the National Settlement Depository (NSD), and the National Clearing Centre (NCC) and the National Mercantile Exchange (NAMEX)	1
2-3	Reporting period, frequency and contact point	Overview of Moscow Exchange Group’s reporting suite Appendix 5. Independent Auditor’s Report Appendix 7. Contact details	<u>2</u> , <u>174</u> , <u>179</u>		1
2-4	Restatements of information	Overview of Moscow Exchange Group’s reporting suite	<u>3</u>		1
2-5	External assurance	Overview of Moscow Exchange Group’s reporting suite Appendix 5. Independent Auditor’s Report	<u>2</u> , <u>174</u>		1
Activities and workers					
2-6	Activities, value chain and other business relationships	2022 Sustainability Performance Highlights Moscow Exchange Group Profile Sustainability Approaches and Procedures Genuine corporate governance and business ethics	<u>21–23</u> , <u>115</u>		1
2-7	Employees	2022 Sustainability Performance Highlights Respect for human rights, equal opportunities and staff engagement Sustainability Approaches and Procedures Respect for human rights, equal opportunities and staff engagement	<u>45</u> , <u>76</u> , <u>78–79</u>		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
2-8	Workers who are not employees	2022 Sustainability Performance Highlights Respect for human rights, equal opportunities and staff engagement	76, 79		1
Governance					
2-9	Governance structure and composition	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Approaches and Procedures Genuine corporate governance and business ethics	36, 38, 102		1
2-10	Nomination and selection of the highest governance body	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics	36		1
2-11	Chair of the highest governance body	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics	36		1
2-12	Role of the highest governance body in overseeing the management of impacts	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Trusted relations with local communities Sustainability Approaches and Procedures Genuine corporate governance and business ethics Respect for human rights, equal opportunities and staff engagement	38, 67, 105, 107, 116		1
2-13	Delegation of responsibility for managing impacts	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Approaches and Procedures Genuine corporate governance and business ethics	38, 107		1
2-14	Role of the highest governance body in sustainability reporting	Overview of Moscow Exchange Group's reporting suite» Sustainability Approaches and Procedures Genuine corporate governance and business ethics	2, 4, 105, 107		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
2-15	Conflicts of interest	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Approaches and Procedures Genuine corporate governance and business ethics	38, 42, 107		1
2-16	Communication of critical concerns	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics	37, 42		1
2-17	Collective knowledge of the highest governance body	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics	36		1
2-18	Evaluation of the performance of the highest governance body	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Approaches and Procedures Genuine corporate governance and business ethics	39, 105		1
2-19	Remuneration policies	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Approaches and Procedures Genuine corporate governance and business ethics	38, 40, 105–106		1
2-20	Process to determine remuneration	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Approaches and Procedures Genuine corporate governance and business ethics	38, 105–106		1
2-21	Annual total compensation ratio	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics	41	Due to existing market practices and high sanctions risks, it was decided not to disclose information about the remuneration of the most senior official of Moscow Exchange Group and the ratio of his remuneration to the median remuneration of the Group's employees	1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
Strateg					
2-22	Statement on sustainable development strategy	Statement from the Chairman of the Executive Board	12		1
2-23	Policy commitments	2022 Sustainability Performance Highlights Respect for human rights, equal opportunities and staff engagement Sustainability Approaches and Procedures Genuine corporate governance and business ethics Respect for human rights, equal opportunities and staff engagement	45 , 109 , 112 , 115–116 , 118		1
2-24	Embedding policy commitments	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Environmentally friendly and trusted market infrastructure Sustainability Approaches and Procedures Respect for human rights, equal opportunities and staff engagement Environmentally friendly and trusted market infrastructure	38 , 49–50 , 116 , 121–122		1
2-25	Processes to remediate negative impacts	Sustainability Approaches and Procedures Genuine corporate governance and business ethics	112		1
2-26	Mechanisms for seeking advice and raising concerns	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Approaches and Procedures Genuine corporate governance and business ethics	42 , 112		1
2-27	Compliance with laws and regulations	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Data Genuine corporate governance and business ethics Sustainability Approaches and Procedures Genuine corporate governance and business ethics	43 , 72 , 112		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
2-28	Membership associations	2022 Sustainability Performance Highlights Trusted relations with local communities Sustainability Approaches and Procedures Trusted relations with local communities	68 , 142 , 147		1
Stakeholder engagement					
2-29	Approach to stakeholder engagement	2022 Sustainability Performance Highlights Trusted relations with local communities Sustainability Approaches and Procedures Respect for human rights, equal opportunities and staff engagement Trusted relations with local communities	67 , 116 , 141 , 143		1
2-30	Collective bargaining agreements	Sustainability Data Respect for human rights, equal opportunities and staff engagement	81	Collective agreements are not concluded with employees. The Moscow Exchange Group recognises the right of its employees to conclude collective agreements, the right to freedom of assembly and association, and the right to form and join organisations representing their interests without fear of any consequences	1
GRI-3: Material Topics (2021)					
3-1	Approach to identifying material topics	Overview of Moscow Exchange Group's reporting suite MOEX Group's approach to materiality	4		1
3-2	List of material topics	Overview of Moscow Exchange Group's reporting suite MOEX Group's approach to materiality Climate Agenda 2022 Sustainability Performance Highlights Environmentally friendly and trusted market infrastructure Advanced practices of responsible investing Sustainability Approaches and Procedures Advanced practices of responsible investing	4 , 26 , 49 , 58–59 , 62 , 134		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
Material Topics					
Information Security					
GRI-3: Material Topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Environmentally friendly and trusted market infrastructure	126		1
GRI 418: Customer Privacy (2016)					
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Sustainability Data Environmentally friendly and trusted market infrastructure	86	In 2022, the Group received no complaints about the leakage or loss of personal data	1
Sustainable technological development					
GRI-3: Material Topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Environmentally friendly and trusted market infrastructure	126		1
Compliance with laws and regulations					
GRI-3: Material Topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Genuine corporate governance and business ethics	112		1
Health, safety and well-being of employees					
GRI-3: Material Topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Respect for human rights, equal opportunities and staff engagement	119		1
GRI 403: Occupational Health and Safety (2018)					
403-1	Occupational health and safety management system	Sustainability Approaches and Procedures Respect for human rights, equal opportunities and staff engagement	119	At the moment, the Labour protection management system does not cover persons who are not employees of the company	1
403-2	Hazard identification, risk assessment, and incident investigation		120		1
403-3	Occupational health services	2022 Sustainability Performance Highlights Respect for human rights, equal opportunities and staff engagement	48		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
403-4	Worker participation, consultation, and communication on occupational health and safety	Sustainability Approaches and Procedures Respect for human rights, equal opportunities and staff engagement	119	Employees can discuss any issues of interest to them related to labour protection and safety with technical support specialists, employees can send requests, complaints and suggestions on labour protection issues	1
403-5	Worker training on occupational health and safety	Sustainability Data Respect for human rights, equal opportunities and staff engagement Sustainability Approaches and Procedures Respect for human rights, equal opportunities and staff engagement	85 , 120		1
403-6	Promotion of worker health	2022 Sustainability Performance Highlights Respect for human rights, equal opportunities and staff engagement Sustainability Approaches and Procedures Respect for human rights, equal opportunities and staff engagement	48 , 120		1
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Sustainability Approaches and Procedures Respect for human rights, equal opportunities and staff engagement	119	At the moment, the labour protection management system does not cover persons who are not employees of the company.	1
403-8	Workers covered by an occupational health and safety management system	Sustainability approaches and procedures Respect for human rights, equal opportunities and staff engagement	119–120	Partially disclosed. The labour protection system covers 100% of employees of the Group's companies. The Group's contractors and business partners are not covered by the health and safety management system	1
403-9	Work-related injuries	2022 Sustainability Performance Highlights Respect for human rights, equal opportunities and staff engagement Sustainability Data	48 , 85	Partially disclosed. Data is collected only for employees of the Moscow Exchange Group	1
403-10	Work-related ill health	Respect for human rights, equal opportunities and staff engagement	48 , 85	Partially disclosed. Data is collected only for employees of the Moscow Exchange Group	1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
Financial Literacy					
GRI-3: Material Topics (2021)					
3-3	Management of material topics	2022 Sustainability Performance Highlights Trusted relations with local communities	138		1
GRI 203: Indirect Economic Impacts (2016)					
203-2	Significant indirect economic impacts	2022 Sustainability Performance Highlights Trusted relations with local communities Sustainability Approaches and Procedures Trusted relations with local communities	64 , 138		1
GRI 413: Local Communities (2016)					
413-1	Operations with local community engagement, impact assessments, and development programs	2022 Sustainability Performance Highlights Trusted relations with local communities Sustainability Approaches and Procedures Trusted relations with local communities	64 , 69 , 138–139 , 141	Partially disclosed. Local community engagement programmes are implemented through the activities of Moscow Exchange PJSC to improve financial literacy	1
Quality of Corporate governance					
GRI-3: Material Topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Genuine corporate governance and business ethics	102 , 105		1
Influence on government and regulatory policy					
GRI-3: Material Topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Trusted relations with local communities	143		1
GRI 415: Public Policy (2016)					
415-1	Political contributions	Sustainability Data Trusted relations with local communities Sustainability Approaches and Procedures Trusted relations with local communities	98 , 143	In 2022, the Group made no political donations	1
Development of business ethics and compliance culture					
GRI-3: Material topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Genuine corporate governance and business ethics	112		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
GRI 205: Anti-corruption (2016)					
205-1	Operations assessed for risks related to corruption	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Data Genuine corporate governance and business ethics	44 , 74		1
205-2	Communication and training about anti-corruption policies and procedures	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Data Genuine corporate governance and business ethics Sustainability Approaches and Procedures Genuine corporate governance and business ethics	43 , 74 , 112		1
205-3	Confirmed incidents of corruption and actions taken	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Data Genuine corporate governance and business ethics	43 , 44 , 72	In 2022, there were no incidents of corruption or violations of the Code of Professional Ethics. Also, no significant corruption risks were identified	1
GRI 206: Anti-competitive Behavior (2016)					
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Data Genuine corporate governance and business ethics	43 , 74	There have been no confirmed cases of antitrust violations over the past three years	1
Stimulating ESG-practices					
GRI-3: Material topics (2021)					
3-3	Management of material topics	2022 Sustainability Performance Highlights Advanced practices of responsible investing Sustainability Approaches and Procedures Advanced practices of responsible investing	57 , 59 , 132		1
GRI 203: Indirect Economic Impact (2016)					
203-2	Significant indirect economic impacts	2022 Sustainability Performance Highlights Advanced practices of responsible investing	59		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
Fair Labour Relations					
GRI-3: Material topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Respect for human rights, equal opportunities and engagement of staff	116		1
GRI 401: Employment (2016)					
401-1	New employee hires and employee turnover	2022 Sustainability Performance Highlights Respect for human rights, equal opportunities and engagement of staff Sustainability Data Respect for human rights, equal opportunities and engagement of staff	46, 76–78		1
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Sustainability Approaches and Procedures Respect for human rights, equal opportunities and engagement of staff	117		1
401-3	Parental leave	Sustainability Data Respect for human rights, equal opportunities and engagement of staff	81		1
GRI 402: Labour/Management Relations (2016)					
402-1	Minimum notice periods regarding operational changes	Sustainability Approaches and Procedures Respect for human rights, equal opportunities and engagement of staff	117	The Group is required to notify employees of significant changes in the company's activities no later than two months in accordance with the Labour Code of the Russian Federation	1
Ensuring Diversity and Equal Opportunities for staff					
GRI-3: Material topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Respect for human rights, equal opportunities and engagement of staff	118		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
GRI 405: Diversity and Equal Opportunity (2016)					
405-1	Diversity of governance bodies and employees	2022 Sustainability Performance Highlights Respect for human rights, equal opportunities and engagement of staff Sustainability Data Respect for human rights, equal opportunities and engagement of staff	47, 79–80, 83		1
405-2	Ratio of basic salary and remuneration of women to men	Sustainability Data Respect for human rights, equal opportunities and engagement of staff	84	The ratio of remuneration by grade is disclosed, except for senior management, due to the lack of practice of calculating this indicator in relation to senior managers only represented by members of the Management Board	1
GRI 406: Non-discrimination (2016)					
406-1	Incidents of discrimination and corrective actions taken	Sustainability Data Respect for human rights, equal opportunities and engagement of staff	84	No cases of discrimination were recorded at any of the Group's entities in 2022	1
Sustainability sector and ESG-indices					
GRI-3: Material topics (2021)					
3-3	Management of material topics	2022 Sustainability Performance Highlights Advanced practices of responsible investing Sustainability Approaches and Procedures Advanced practices of responsible investing	59, 130, 132		1
GRI 203: Indirect Economic Impact (2016)					
203-2	Significant indirect economic impacts	2022 Sustainability Performance Highlights Advanced practices of responsible investing	58–59		1
Carbon Units Market					
GRI-3: Material topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Advanced practices of responsible investing	134		1
GRI 203: Indirect Economic Impacts (2016)					
203-2	Significant indirect economic impacts	2022 Sustainability Performance Highlights Advanced practices of responsible investing	59		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
Staff Training and Development					
GRI-3: Material topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Respect for human rights, equal opportunities and engagement of staff	<u>118</u>		1
GRI 404: Training and Education (2016)					
404-1	Average hours of training per year per employee	Sustainability Data Respect for human rights, equal opportunities and engagement of staff	<u>82</u>		1
404-2	Programs for upgrading employee skills and transition assistance programs	2022 Sustainability Performance Highlights Respect for human rights, equal opportunities and engagement of staff Sustainability Approaches and Procedures Respect for human rights, equal opportunities and engagement of staff	<u>46, 118</u>		1
404-3	Percentage of employees receiving regular performance and career development reviews	Sustainability Data Respect for human rights, equal opportunities and engagement of staff Sustainability Approaches and Procedures Respect for human rights, equal opportunities and engagement of staff	<u>83, 116</u>		1
Equal opportunities and Human rights					
GRI-3: Material topics (2021)					
3-3	Management of material topics	Sustainability Approaches and Procedures Respect for human rights, equal opportunities and engagement of staff	<u>118</u>		1
GRI 408: Child Labour (2016)					
408-1	Operations and suppliers at significant risk for incidents of child labour	Appendix 1. Statement of Moscow Exchange on compliance with the principles of the UN Global Compact GRI Content Index	<u>150</u>	No risk of child Labour has been identified at any of the Group's entities The information about suppliers at significant risk for incidents of child labour is omitted because the Group does not currently assess suppliers for that risk	1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
GRI 409: Forced or Compulsory Labour (2016)					
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory Labour	Appendix 2. Statement of Moscow Exchange on respect for human rights and counteracting modern slavery GRI Content Index	<u>150, 153</u>	No risk of forced or compulsory Labour has been identified at any of the Group's entities. The information about suppliers at significant risk for incidents of forced or compulsory Labour is omitted because the Group does not currently assess suppliers for that risk.	1
Management of sustainable development risks					
GRI-3: Material topics (2021)					
3-3	Management of material topics	2022 Sustainability Performance Highlights Climate agenda Environmentally friendly and trusted market infrastructure Sustainability Approaches and Procedures Environmentally friendly and trusted market infrastructure	<u>26-27, 49, 121, 125</u>		1
GRI 201: Economic Performance (2016)					
201-2	Financial implications and other risks and opportunities due to climate change	2022 Sustainability Performance Highlights Climate agenda Environmentally friendly and trusted market infrastructure	<u>28, 50</u>		1
Investments to Innovation, small and medium-sized enterprises					
GRI-3: Material topics (2021)					
3-3	Management of material topics	2022 Sustainability Performance Highlights Advanced practices of responsible investing Sustainability Approaches and Procedures Advanced practices of responsible investing	<u>62, 132-133</u>		1
GRI 203: Indirect Economic Impacts (2016)					
203-2	Significant indirect economic impacts	2022 Sustainability Performance Highlights Advanced practices of responsible investing	<u>62</u>		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
Other material topics that can be disclosed selectively					
Sustainable Supply Chain					
GRI 414: Supplier Social Assessment (2016)					
414-1	New suppliers that were screened using social criteria	2022 Sustainability Performance Highlights Genuine corporate governance and business ethics Sustainability Approaches and Procedures Genuine corporate governance and business ethics	44 , 115	To improve the business environment and reduce risks in the supply chain, in 2022, the Code of Business Conduct for the supplier/counterparty of the Moscow Exchange Group companies was developed, which introduces the principles of responsible business conduct. The Exchange expects counterparties to comply with the principles of the Code, which will be considered when conducting procurement procedures. The Code will be adopted in 2023	1
Economic impact on the region of presence					
GRI 201: Economic Performance (2016)					
201-1	Direct economic value generated and distributed	Sustainability Data Genuine corporate governance and business ethics	72		1
GRI 202: Market Presence (2016)					
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	2022 Sustainability Performance Highlights Respect for human rights, equal opportunities and engagement of staff Sustainability Data Respect for human rights, equal opportunities and engagement of staff	47 , 84		1
GRI 207: Tax (2019)					
207-1	Approach to tax	Sustainability Approaches and Procedures Genuine corporate governance and business ethics	113		1
207-2	Tax governance, control, and risk management	Sustainability Approaches and Procedures Genuine corporate governance and business ethics	113		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
207-3	Stakeholder engagement and management of concerns related to tax	Sustainability Approaches and Procedures Genuine corporate governance and business ethics	113		1
Charity and Sponsorship					
GRI 203: Indirect Economic Impacts (2016)					
203-1	Infrastructure investments and services supported	2022 Sustainability Performance Highlights Trusted relations with local communities Sustainability Data Trusted relations with local communities Sustainability Approaches and Procedures Trusted relations with local communities	69 , 98 , 139		1
203-2	Significant indirect economic impacts	2022 Sustainability Performance Highlights Trusted relations with local communities Sustainability Approaches and Procedures Trusted relations with local communities	69 , 139		1
Achievement of Environmental Efficiency					
GRI 302: Energy (2016)					
302-1	Energy consumption within the organization	2022 Sustainability Performance Highlights Resource efficiency and environmental impact	55 , 88	The Group does not sell energy to third parties. The Group does not consume fuel from renewable energy sources	1
302-3	Energy intensity	Sustainability Data Resource efficiency and environmental impact	55 , 88		1
GRI 303: Water and Effluents (2018)					
303-3	Water withdrawal	Sustainability Data Resource efficiency and environmental impact Sustainability Approaches and Procedures	55 , 90	Moscow Exchange Group consumes and intakes water only from municipal networks and doesn't operate in regions affected by water security	1
303-4	Water discharge	Resource efficiency and environmental impact	90 , 129		1
303-5	Water consumption		90 , 129		1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
GRI 305: Emissions (2016)					
305-1	Direct (Scope 1) GHG emissions	2022 Sustainability Performance Highlights	88		1
305-2	Energy indirect (Scope 2) GHG emissions	Resource efficiency and environmental impact Sustainability Data	88		1
305-3	Other indirect (Scope 3) GHG emissions	Resource efficiency and environmental impact	90		1
305-4	GHG emissions intensity		55, 90		1
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	2022 Sustainability Performance Highlights Resource efficiency and environmental impact Sustainability Data Resource efficiency and environmental impact Sustainability Approaches and Procedures Resource efficiency and environmental impact	55, 90, 129		1
GRI 306: Waste (2020)					
306-1	Waste generation and significant waste-related impacts	2022 Sustainability Performance Highlights Resource efficiency and environmental impact	56, 129		1
306-2	Management of significant waste-related impacts	Sustainability Approaches and Procedures Resource efficiency and environmental impact	56, 129	Waste disposal from the Moscow Exchange Group facilities is carried out within the framework of agreements concluded with specialised organisations in accordance with the requirements of environmental legislation, with a subsequent request for documents confirming the actual processing of waste or their disposal at a solid domestic waste landfill	1

Indicator	Disclosure	Location in the Report	Pages	Omissions and comments	Reporting boundaries
306-3	Waste generated	Sustainability Data	56, 90–92		1
306-5	Waste directed to disposal	Resource efficiency and environmental impact	92, 129	Breakdown of the total weight of waste directed to disposal by composition of the waste is omitted due to unavailability of the necessary information. The Group does not collect waste disposal data by type of waste	1
Support for freedom of association and collective bargaining					
GRI 407: Freedom of Association and Collective Bargaining (2016)					
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	GRI Content Index		No risk of infringement of the right to freedom of association has been identified at any of the Group's entities. The information about suppliers in which workers' rights to exercise freedom of association or collective bargaining may be violated or at significant risk is omitted because this risk is not assessed for the Group's suppliers	1
Biodiversity conservation activities					
GRI 304: Biodiversity (2016)					
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	GRI Content Index		Organisations included within the reporting boundaries operate in the city of Moscow, far from protected areas and areas of high biodiversity value	1

APPENDIX 4. SASB METRICS

Security & Commodity Exchanges

Code	Accounting metric	Unit of measurement	Disclosure status	Section	Pages	Scope
Promoting transparent and efficient capital markets						
FN-EX-410a.1	(1) Number and (2) average duration of (a) halts related to public release of information and (b) pauses related to volatility	(1) Number, (2) Minutes	Partially disclosed	Sustainability Data Environmentally friendly and trusted market infrastructure Due to the absence of regulatory requirements, Moscow Exchange does not collect statistics on trading suspensions that occurred due to material events in accordance with the requirements specified in the SASB standards. As such, the Exchange cannot disclose these indicators in a verified form	<u>86</u>	1
FN-EX-410a.2	Percentage of trades generated from automated trading systems	%	Disclosed	Sustainability Data Environmentally friendly and trusted market infrastructure Advanced practices of responsible investing	<u>86</u>	1
FN-EX-410a.3	Description of alert policy regarding timing and nature of public release of information	–	Disclosed	2022 Sustainability Performance Highlights Advanced practices of responsible investing Listing Rules of Moscow Exchange	<u>57</u>	1
FN-EX-410a.4	Description of policy to encourage or require listed companies to publicly disclose environmental, social, and governance (ESG) information	–	Disclosed	2022 Sustainability Performance Highlights Sustainability Approaches and Procedures Advanced practices of responsible investing	<u>59–60, 131</u>	1
Managing conflicts of interest						
FN-EX-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	RUB	Disclosed	Sustainability Data Advanced governance and responsible business practices	<u>72</u>	1

Code	Accounting metric	Unit of measurement	Disclosure status	Section	Pages	Scope
FN-EX-510a.2	Discussion of processes for identifying and assessing conflicts of interest	–	Disclosed	Sustainability Approaches and Procedures Advanced governance and responsible business practices Conflict of Interest and Corporate Conflict Policy of Moscow Exchange	<u>107</u>	1
Managing business continuity and technology risks						
FN-EX-550a.1	(1) Number of significant market disruptions and (2) duration of downtime	Hours	Disclosed	2022 Sustainability Performance Highlights Sustainability Data Environmentally friendly and trusted market infrastructure	<u>50, 86</u>	1
FN-EX-550a.2	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected	Number, Percentage (%)	Disclosed	Sustainability Data Environmentally friendly and trusted market infrastructure	<u>86</u>	1
FN-EX-550a.3	Description of efforts to prevent technology errors, security breaches, and market disruptions	–	Disclosed	2022 Sustainability Performance Highlights Sustainability Approaches and Procedures Environmentally friendly and trusted market infrastructure	<u>49–51, 126–127</u>	1
Activity metrics						
FN-EX-000.A	Average daily number of trades executed, by product or asset class	Number	Disclosed	2022 Sustainability Performance Highlights Moscow Exchange Group Profile Sustainability Data Advanced practices of responsible investing	<u>23, 94</u>	1
FN-EX-000.B	Average daily volume traded, by product or asset class	RUB	Disclosed	2022 Sustainability Performance Highlights Moscow Exchange Group Profile Sustainability Data Advanced practices of responsible investing	<u>23, 94</u>	1

APPENDIX 5. INDEPENDENT AUDITOR'S REPORT



INDEPENDENT PRACTITIONER'S LIMITED ASSURANCE REPORT [TRANSLATION FROM RUSSIAN ORIGINAL]

To the management of Public Joint-Stock Company Moscow Exchange MICEX-RTS

We have undertaken a limited assurance engagement of the accompanying Moscow Exchange 2022 Sustainability Report (hereinafter referred to as the Report)¹.

Responsibility of Public Joint-Stock Company Moscow Exchange MICEX-RTS

Public Joint-Stock Company Moscow Exchange MICEX-RTS (hereinafter referred to as Moscow Exchange) is responsible for preparation of the Report in accordance with the applicable criteria:

- GRI Sustainability Reporting Standards, as specified in the Report section GRI Content Index;
- requirements of the SASB "Security and Commodity Exchanges" Standard

(hereinafter jointly referred to as Applicable criteria).

This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation of the Report that is free from material misstatement, whether due to fraud or error.

Our Independence and Quality Management

We have complied with the independence and ethical requirements of the Rules of Independence of the Auditors and Audit Organizations and The Code of Professional Ethics of the Auditors, as well as of The International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

Our firm applies International Standard on Quality Management 1, which requires our firm to design, implement and operate a system of quality management, which is supported by policy or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our Responsibility

Our responsibility is to express a limited assurance conclusion on compliance of the Report with the Applicable criteria based on the procedures we have performed and the evidence we have obtained.

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information. This standard requires that we plan and perform this engagement to obtain limited assurance about whether the Report is free from material misstatement.

A limited assurance engagement undertaken in accordance with this standard involves assessing the suitability in the circumstances of Moscow Exchange use of Applicable criteria as the basis for the preparation of the Report, assessing the risks of material misstatement of the Report whether due to fraud or error, responding to assessed risks as necessary in the circumstances, and evaluating the overall presentation of the Report.

A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

The procedures we performed were based on our professional judgment and included inquiries, inspections of documents, analytical procedures, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

Given the circumstances of the engagement, in performing the procedures listed above we have undertaken the following activities:

- Interviewing the management and employees of Moscow Exchange and obtaining documentary evidence.
- Study of information available on the websites of the Moscow Exchange Group companies related to their activities in the context of sustainable development.

¹ The report discloses the results of the activities of the following organizations of Moscow Exchange Group: Moscow Exchange, the National Settlement Depository, the National Clearing Centre and the National Mercantile Exchange (hereinafter jointly referred to as Moscow Exchange Group).



- Study of public statements of third parties concerning economic, environmental and social aspects of the Moscow Exchange Group companies activities, in order to check the validity of the declarations made in the Report.
- Analysis of non-financial reports of comparable companies for benchmarking purposes.
- Study of the existing processes of collection, processing, documenting, verification, analysis and selection of data to be included into the Report.
- Selective review of documents and data on the performance of the economic, environmental and social impact management systems in Moscow Exchange Group companies.
- Assessment of conformity of the reported information, which is referenced in the section of the Report "GRI Content Index" and is required to comply with the requirements of GRI Sustainability Reporting Standards as well as the reported information, which is referenced in the section of the Report "SASB Index", to the documents provided to us, including external and internal reporting documents.
- Analysis of information in the Report for compliance with the Applicable criteria.

The procedures were undertaken exclusively in relation to data for the year ended 31 December 2022.

The procedures were not performed in relation to forward-looking statements; statements expressing the opinions, beliefs and intentions of Moscow Exchange as the parent company of Moscow Exchange Group to take any action related to the future; as well as statements based on expert opinion.

The procedures were performed in relation to the Russian version of the Report, subject to be published by the date specified in the GRI 2-3 Disclosure, as well as to be sent to Global Reporting Initiative in order to notify it of the use of the GRI Sustainability Reporting Standards in the Report preparation.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion about compliance of the Report, in all material respects, with the Applicable criteria.

Limited Assurance Conclusion

Based on the procedures we have performed and the evidence we have obtained nothing has come to our attention that causes us to believe that the Report is not prepared, in all material respects, in accordance with the Applicable criteria.

FBK, LLC

Practitioner
Partner
acting under Power of Attorney No. 130/21 of September 09, 2021
The Russian Federation, Moscow

June 28, 2023

V.Y. Skobarev
(registration
21606080523)

number

APPENDIX 6. GLOSSARY

Term	Definition
ADTV	Average daily trading volume
Carbon unit	A verified implementation result of the climatic project expressed as a mass of greenhouse gas equivalent to one tonne of carbon dioxide.
CBI	Climate Bonds Initiative: a bond initiative for financing global climate change projects
CDP	Carbon Disclosure Project: an international project aimed at disclosing information on GHG emissions
Climate Project	A set of measures to reduce (prevent) greenhouse gas emissions or increase their absorption
COP27	The 27th UN Climate Change Conference
COSO	Committee of Sponsoring Organizations of the Treadway Commission. For the purposes of this report, COSO is a guide for organising internal control systems issued by this organisation
COVID-19	A coronavirus disease caused by the SARS-CoV-2 virus
CRS	Common Reporting Standard: a unified standard for automatic exchange of tax information
DC	Data centre
Direct greenhouse gas emissions	Emissions from greenhouse gas sources owned or controlled by the reporting entity
EGRUL	Unified State Register of Legal Entities
ESG	Environmental, social, and governance: principles of environmental protection, social responsibility, and corporate governance
ETF	Exchange-traded funds
FATCA	Foreign Account Tax Compliance Act
FESE	Federation of European Securities Exchanges
FIA	Futures Industry Association
FIFO	First in, first out: a principle strictly applied to processing applications of participants
FX	Foreign exchange
Green bonds	A type of bond that meets the four principles of green bonds defined by the ICMA, with proceeds used by the issuer to finance projects committed to these principles. In general, such projects should result in specific environmental benefits and should be aimed at developing activities that contribute to environmental sustainability
GRI SRS (GRI)	Global Reporting Initiative Sustainability Reporting Standards: the global standards for sustainability reporting
Growth sector	An initiative of Moscow Exchange and a number of partners—an exchange sector designed to help SMEs attract investment
HR	Human resources
HSE	Higher School of Economics (National Research University)
ICMA	International Capital Market Association
IHI	International health insurance
IIM	Innovation and Investment Market

Term	Definition
Indirect GHG Emissions	Emissions that result from the activities of the reporting entity, but which occur beyond its established boundaries. Scope 2 covers indirect greenhouse gas emissions associated with the company's consumption of electricity, heat, or steam received from external generation facilities. Scope 3 corresponds to other indirect emissions, including emissions from extraction and processing of purchased materials, fuel and services; freight transportation by vehicles not owned or controlled by the reporting entity; external contractor activities; waste disposal; etc.
IOSCO	International Organization of Securities Commissions
IPCC	Intergovernmental Panel on Climate Change
IPO	Initial public offering of shares on a stock exchange
IR	Investor relations
ISO	International Organization for Standardization
IT	Information technology
KPI	Key performance indicators
KYC	Know Your Customer: a principle of banking and exchange organisations that involves vetting a counterparty before conducting a financial transaction
MEMS	MOEX extra motivation system
MEPhI (MEPhI National Research Nuclear University)	Moscow Engineering Physics Institute (National Research Nuclear University)
MICEX	Moscow Interbank Currency Exchange
MSCI	Morgan Stanley Capital International
MVP	Minimum viable product: a concept facilitating the creation of a product with features that attract customers
NCC	National Clearing Centre
NAMEX	National Mercantile Exchange
NAUFOR	National Association of Stock Market Participants
NP	Non-profit partnership
NSD	National Settlement Depository
OECD	Organization for Economic Co-operation and Development
OSAGO	Compulsory car insurance
PJSC	Public joint-stock company
PRI	Principles of Responsible Investment: a UN initiative to promote responsible investment principles
Quota fulfilment unit	The quota fulfilment unit is a verified fulfilment result of the set quota expressed as a difference between the set quota and the actual mass of greenhouse gas emissions equivalent to one tonne of carbon dioxide.
RBEN	Russian Business Ethics Network: a network of business ethics and CSR associations
Repo	A transaction on the purchase (sale) of a security with an obligation to resell (purchase) after a certain period of time at a predetermined price specified in the agreement

Term	Definition
Responsible investment	An investment approach that takes into account environmental, social and governance factors, as well as issues of long-term market stability
RES	Renewable energy sources
Ring the Bell for Financial Literacy	An international initiative of exchanges that seeks to ensure general access of the public to basic financial literacy as part of the UN Sustainable Development Goals
Ring the Bell for Gender Equality	An international initiative of exchanges that promotes gender equality as part of the UN Sustainable Development Goals
RSHB	Russian Agricultural Bank
RSPP	Russian Union of Industrialists and Entrepreneurs
SASB	Sustainability Accounting Standards Board
SASB Security & Commodity Exchanges, Sustainability Accounting Standard	Sustainability accounting standard for security and commodity exchanges, developed by the SASB
Scope 1	Scope 1 (GHG), see Direct GHG Emissions
Scope 2	Scope 2 (GHG), see Indirect GHG Emissions
Scope 3	Scope 3 (GHG), see Indirect GHG Emissions
SME	Small and medium-sized enterprises
Social bonds	A type of bond that meets the four principles of social bonds defined by the ICMA, with proceeds used by the issuer to finance social projects committed to these principles. In general, such projects should aim to solve significant social problems
SPO	Secondary Public Offering: a public offering of shares from an issuer already listed on a stock exchange
SRO NFAh	Self-regulatory organisation National Financial Association
SSE	Sustainable Stock Exchanges initiative: a UN Partnership Programme organised by the UN Conference on Trade and Development (UNCTAD), the UN Global Compact, the UN Environment Programme Finance Initiative (UNEP FI), and the UN Principles for Responsible Investment (PRI)
Sustainability sector	An initiative of Moscow Exchange and the Ministry of Economic Development—an exchange sector aimed at promoting investment in environmental and social projects
TCFD	Task Force on Climate-Related Financial Disclosures, created by the Financial Stability Board
TTA	Technical training aids
UN SDGs	United Nations Sustainable Development Goals
UNEP FI	United Nations Environment Programme—Finance Initiative
UNGC	United Nations Global Compact
VEB.RF Taxonomy	The Russian National Green Finance Methodology, developed from March 2020 to May 2021 and approved by a decree of the Russian Government on 21 September 2021; the National Methodology covers the taxonomy of green projects, the taxonomy of adaptation projects, and green finance standards
Verification of the climate project	The process of evaluating and verifying the correctness of the calculation of the number of carbon units produced
VHI	Voluntary health insurance
WFE	World Federation of Exchanges
WHO	World Health Organization

APPENDIX 7. CONTACT DETAILS

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Full name	Moscow Exchange MICEX-RTS PJSC
Headquarters	13, Bolshoy Kislovsky per., Moscow, Russia Federation, 125009
Corporate website	www.moex.com
Tel.	+7 (495) 232 33 63 +7 (495) 363 32 32
Fax	+7 (495) 234 48 40

List of contacts

For the media	pr@moex.com
For investors and analysts	ir@moex.com
For issuers	issuersconsulting@moex.com
For questions about listing	listing@moex.com
For technical support	help@moex.com
For questions about the activities of the Supervisory Board	SeniorIndependentDirector@moex.com
Contact person for this report	Maxim Kochetkov Maxim.Kochetkov@moex.com