

Yandex Group Supplier Code of Conduct

approved on December 24, 2021.
effective from February 1, 2022

Introduction

This Yandex Group Supplier Code of Conduct (hereinafter - "Code") includes the business principles to be followed by all counterparties, including consultants, agents, distributors and other individuals or entities working for any company (or with any company) that is part of Yandex Group (hereinafter - "suppliers"). A supplier's failure to comply with these principles within the framework of our joint activities may result in the impossibility of their continued business relationship with Yandex. We expect that our suppliers will inform all employees and subcontractors that shall interact with Yandex about the contents of this Code.

Yandex is committed to the highest standards of business ethics. Therefore, this Code shall be treated as inextricably linked with the [Yandex Group's Code of Business Ethics and Conduct](#) and [Yandex Principles](#) that Yandex commits to in order to be a reliable and honest partner for their suppliers. We are committed to building mutually beneficial relationships based on openness and mutual respect. We want to have common views and intentions with our partners, including benefiting society and caring about the environment.

Main points about the Code

<p>1. What are the foundations for the Supplier Code of Conduct?</p> <p>The Code is grounded in the Yandex Code of Business and Corporate Conduct. We expect that both our suppliers and their employees demonstrate the same level of commitment as we do. This Code and the Yandex Code of Conduct are based on the principles set forth in the applicable laws and the following international documents: Universal Declaration of Human Rights, United Nations Guiding Principles on Business and Human Rights, ILO Conventions, Principles of the UN global contract.</p>	<p>2. What do I do if the Code's principles are inconsistent with the applicable laws?</p> <p>If the Code includes stricter requirements, our suppliers and we shall follow the provisions of the Code. If the requirements of applicable laws are stricter, we shall follow the laws.</p> <p>We made sure that this Code could be used as a universal guideline in most cases, in line with the requirements of applicable laws.</p>
<p>3. Will Yandex check compliance with the Code?</p> <p>We trust our partners that have assured us that they share the principles of business conduct set forth in the Code and we are happy to familiarize ourselves with their public reporting. However, Yandex reserves the right to implement audit procedures. For example, Yandex may initiate an audit. The audit, its scope, and other details shall be agreed with the supplier in advance.</p>	<p>4. How do I report a violation of the Code?</p> <p>Our hotline is available 24/7 at the link: https://yandex.alertline.eu. The hotline is serviced by an independent third party that guarantees the confidentiality of all reports and complaints. Your report is registered in the system with a unique ID that you can use to track the request status and view the final decision.</p>

Key principles

1. Fair and honest business practices

Competition

Our suppliers must aim to maintain an open, honest, and pro-competitive environment in compliance with applicable anti-monopoly laws. They do not tolerate unfair competition, avoid entering deals that restrict competition, including agreements on market-sharing based on territory, product volume or range, where both buyers and sellers are involved. Our supplier shall not share confidential information with our competitors or use other anti-competition practices.

Anti-corruption

Corruption is a criminal offense in all countries where Yandex operates. We strictly prohibit any form of corruption: bribes, payoffs, and other illegal payments to gain or maintain entrepreneurial advantages.

We select our counterparties impartially, taking into account the competitiveness of provided prices, quality of products or services, and reliability of future suppliers. We never offer or accept any kinds of illegal or inappropriate payments, gifts, or services. We prohibit such actions, even if in certain Yandex regions of presence such payments are considered acceptable. Our supplier shall keep in mind that local customs and practices are not an excuse for a criminal offense.

Our suppliers, their affiliated companies, their employees, representatives and other persons involved in relationships with Yandex may not offer, give, request, or accept money, valuable gifts, services or other payments in order to maintain entrepreneurial advantages or receive more favorable treatment from or on behalf of Yandex.

If our suppliers suspect an actual or possible violation of the principles set out in this section, they shall immediately report their suspicions to Yandex. To do this, they must send an email to: stop_corruption@yandex-team.ru.

Business gifts and hospitality

We expect that any gift and hospitality that we receive from our suppliers or that our suppliers give or accept when doing business with or on behalf of Yandex comply with the following principles:

- They are reasonably priced.
- They don't create any conflict of interest.
- They are legitimate.
- They comply with local customs and business rules.
- The receiver won't feel obligated to give a return gift.
- They are not a bribe or payoff (and don't give anyone any reason to think they are).
- They are not extorted by the receiver.

Yandex has approval procedures that we follow when giving or receiving gifts and hospitality.

We never accept any money or cash equivalents (such as gift certificates or e-money cards), regardless of their nominal value, from our business partners.

For more information about how we receive and give gifts at Yandex (including applicable limits), see the [Code of Business Ethics and Conduct](#).

Conflicts of interest

Our suppliers, their affiliated companies, their employees, representatives and other entities or individuals involved in doing business with Yandex aim to avoid any conflict of interest regarding Yandex.

A conflict of interest is understood as any circumstance that may put into question the company employees' capacity to act objectively in the interest of the employer and the deal. Conflicts of interest include situations where our supplier, their affiliates, employees, representatives, contractors and other persons involved in relationships with Yandex:

- Are immediate family members of Yandex employees who make decisions or participate in the execution or performance of contracts related to doing business with the supplier.
- Are full-time or part-time Yandex employees or individuals that provide any services to Yandex Group companies.
- Have substantial influence on Yandex Group companies.
- Are under substantial influence of Yandex Group companies.

We also consider a conflict of interest to be any situation where the objectivity of making business decisions while interacting with Yandex might be affected.

If our suppliers learn about any possible conflicts of interest, they shall take measures to eliminate the situation and promptly notify Yandex about this in writing. To do this, they must send an email to: stop_corruption@yandex-team.ru.

Money laundering

We expect our suppliers to fully and accurately document all their business and commercial operations and reflect this in their accounting reports in accordance with applicable laws. Moreover, our supplier shall not be involved in money laundering or the facilitation thereof.

Insider trading

Our suppliers shall not use confidential information regarding Yandex to enter any insider deals. They also undertake not to disclose such information to other people who might use such information to trade securities.

Confidentiality

Our suppliers shall treat any business, technical, commercial, and financial information about Yandex, their products, technologies, and partners as confidential. The supplier shall endeavor to protect Yandex confidential information: they shall use it only for the purpose of performing their obligations to Yandex, they shall not publish, transfer, or disclose it to any entities or individuals without prior permission from Yandex. While doing business with Yandex, our suppliers aim to avoid any unauthorized use of confidential information of third parties and neither disclose nor hand over such information to Yandex without the prior permission of such third parties.

Personal data protection

Yandex carefully protects the data of their employees, users and other individuals and treats such data with absolute care. Our suppliers must comply with laws about personal data protection while collecting, storing, editing, using, transferring, and otherwise processing personal data when doing business with or on behalf of Yandex. For example, when processing personal data, the supplier aims to follow the principles of legitimacy, security, and confidentiality of data, fairness and transparency of data processing, data minimization, and data accuracy. The supplier intends to limit the purposes of processing and timeframes of storing personal data, and controls actions with data.

Intellectual property

Yandex respects the intellectual property rights of other entities and individuals and expects that their own intellectual property rights are respected. Our supplier shall not use Yandex intellectual property (including Yandex software products, databases, patented solutions, trademarks, and logos) without prior written permission. While doing business with Yandex, suppliers shall avoid the unauthorized use of intellectual property of third parties.

Information disclosure

We expect that our suppliers adhere to the principle of transparency and aim to regularly inform stakeholders about the results of their activities, including sustainable development. For example, by providing public reporting. If the information may not be publicly disclosed, we expect our suppliers to be willing to share such data and materials with Yandex if requested (provided that no confidentiality restrictions apply to such information).

2. Respect for human rights and freedoms

Prohibition of child labor and forced labor

Our suppliers don't use illegal child labor and employ only persons of the age legally permitted for employment.

Our suppliers do not tolerate any forms of forced labor or slavery stipulated in the national law and applicable international documents (e.g. [ILO's Forced Labor Convention \(No. 29\)](#)). Our suppliers aim to build their relationships with employees based on voluntary agreements. They neither take part in nor encourage human trafficking and take measures to eliminate human trafficking in the context of their business relationships.

Non-discrimination and diversity

Yandex deems discrimination in any form unacceptable, provides equal opportunities, and sees value in diversity. The same principles are expected to be followed by our suppliers. They comply with all applicable laws and prevent discrimination during hiring or employment. They do not tolerate any harassment or persecution on any grounds, including nationality, gender, age, race, political or religious views, sexual orientation, and other characteristics. Our suppliers make efforts to ensure equal opportunities for their employees and partners, fosters social and cultural diversity and, where possible, aims to cooperate with companies of different sizes, with individual entrepreneurs and self-employed partners.

Non-harassment

Our suppliers do not tolerate any forms of sexual harassment, i.e., unwelcome sexual advances towards other persons.

Fair remuneration

Our suppliers ensure compliance with all the requirements of applicable laws regarding wages, benefits and entitlements, and overtime payment. They aim to offer fair remuneration in a timely manner and in full, ensuring a dignified human existence for the person and their family.

Respect to the right to rest

Our suppliers demonstrate respect and ensures the legally enshrined right to rest for their employees. They comply with the provisions of all applicable laws regarding working hours and overtime duration.

Trade union freedoms

Our suppliers recognize and respects the right of their employees to freedom of association and collective bargaining.

3. Ensuring occupational health and safety

Enabling safe working conditions

Our suppliers aim to ensure working conditions that minimize risks to health and safety. They maintain working equipment in operable condition, provide health and safety guidance, inform employees about risk factors, respond to incidents and eliminate their effects, maintain applicable reporting and take other measures to observe requirements of the laws and to improve working conditions.

4. Environmental responsibility

Complying with environmental laws

Our suppliers comply with applicable laws on environmental protection, including regulations on hazardous materials, byproducts, and the emission and dumping thereof in the air and water.

Rational use of resources

Yandex takes their commitments regarding environmental protection seriously and aims to use natural resources rationally. Our suppliers share the principles of rational consumption, aims at optimal spending of energy, water, raw materials, and other resources, and are mindful of climate change mitigation. They also, whenever possible, give preference to less environmentally harmful packing materials.

Handling hazardous materials

Our suppliers do not use, in their technological processes, any chemicals or other materials that pose a hazard to human health and the environment, referring to lists of such chemicals included in applicable state standards and agreements signed with Yandex. Our suppliers ensure proper processing, storage, and disposal of hazardous materials.

Final statements

We will review this Code on a regular basis to account for the best practices and possible legislative changes.

You can send your questions about the contents of the Code to: zakupka@yandex-team.ru.