

QIWI PLC

Anti-Corruption Policy

December 2018

Terms and Definitions

Anticorruption Clause	Provisions of the agreement establishing the counterparty's obligation to comply with the norms of anti-corruption legislation applicable to the activities of the company of QIWI Group, with which the agreement is concluded.
Close Relatives	Husband, wife, parents, children, adoptive parents, adopted children, siblings and sisters, grandfather, grandmother, grandchildren.
Charitable Contributions	Payments to be made without request or expectation of receiving commercial benefits in registered charitable organizations solely for the benefit of the whole society for the purposes of charity, support for education, social assistance or similar purposes.
Hotline	<p>A set of communication channels that are designed to collect information about the facts of potential violations of the law and internal regulatory documents of the Company by its employees, counterparties or other third parties acting on behalf of the Company. The number of communication channels includes:</p> <ol style="list-style-type: none"> 1) Multichannel telephone line, which is available for employees of companies of QIWI Group; 2) Web form of information message, which is available on the Company's website in the public domain; 3) Dedicated e-mail address, which is available on the Company's website in the public domain.
Company	Company means QIWI plc, incorporated in accordance with the laws of Cyprus, registration number HE 193010, QIWI JSC, QIWI Bank (JSC) and other companies of QIWI Group.
QIWI Group	<p>QIWI Group means QIWI plc (incorporated in accordance with the laws of Cyprus, registration number HE 193010) and the companies and/or undertakings, which directly or indirectly Control QIWI plc, are Controlled by QIWI plc or under common control with QIWI plc.</p> <p>Control, in relation to a legal entity (undertaking) means the direct or indirect holding or control of:</p> <ol style="list-style-type: none"> (a) a majority of the voting rights exercisable at general meetings of the members of that undertaking on all, or substantially all, matters; (b) the right to appoint or remove directors having a majority of the voting rights exercisable at meetings of the board of directors of that undertaking on all, or substantially all, matters; or (c) the right (whether pursuant to a contract, understanding or other arrangement) to direct or cause to be directed directly or indirectly a dominant influence over such other undertaking,

	and (i) where an undertaking is not a company, references above to directors, general meetings and members shall be deemed to refer to the equivalent bodies in such undertaking; and (ii) “Controlled” and “Controlling” shall have a corresponding meaning.
Compliance Officer / Compliance Division	Responsible officer / division of the Company, that is responsible for implementing the anti-corruption procedures adopted by the Company, in accordance with the requirements of applicable anti-corruption legislation and internal documents of the Company.
Counterparty	Any Russian or foreign legal or natural person (including individual entrepreneurs) who has or is in the process of formalizing contractual relations with the Company, with the exception of labor ones.
Conflict of Interest	<p>Situation or circumstances in which:</p> <p>a) the personal interest (direct or indirect) of the Company's employee affects or may affect the proper performance of his official duties, including questioning the objectivity of his decisions;</p> <p>and/or</p> <p>b) there is or may arise a conflict between the personal interest of the Company employee and the rights and lawful interests of the Company, which in turn can lead to harm to the Company's rights and legitimate interests, property and (or) business reputation.</p>
Corruption and Corrupt Practice	<p>a) offering, promising, providing and receiving illegal benefits, tangible and intangible, in any form, directly or through intermediaries, including in the form of bribes and commercial bribes;</p> <p>and/or</p> <p>b) mediation in the conduct of corruption;</p> <p>and/or</p> <p>c) abuse of power, abuse of authority, as well as other unlawful use by an individual of his official position, contrary to the legitimate interests of the Company, including for the purpose of obtaining an unlawful gain, tangible and intangible, for himself or third parties, or unlawfully providing such benefit to the said person by other individuals.</p>
Public Figure	A person who heads the governing bodies forming part of or actively participating in the work of political parties, social movements and associations, foundations, trade unions both at the federal and regional levels.

<p>Representative of the State</p>	<ol style="list-style-type: none"> 1) A person permanently, temporarily or by special authority performing the functions of a representative of the authority or performing organizational management, administrative and economic functions in state bodies, local government bodies, state and municipal institutions, as well as in the Armed Forces of the Russian Federation and other military formations; 2) A person who is a candidate / applicant for a position in state bodies, local self-government bodies, state and municipal institutions, as well as in the Armed Forces of the Russian Federation and other military formations; 3) A person who is an employee of a commercial organization whose shareholder or owner is a state or municipal entity; 4) An appointed or elected person who replaces a position in the bodies of the legislative, executive or judicial power of a foreign state or a person who performs public functions in a foreign country, including ministries or public organizations, or a person who previously served these positions, if upon his resignation less than 1 year elapsed.
<p>Representative of International Public Organization</p>	<p>A person exercising his powers within an organization whose members (on the basis of joint activities to protect common interests and achieve statutory goals in civil, political, cultural, social and economic spheres) are subjects from different countries and registered in a state whose legislation allows foreign individuals or legal entities to create public organizations and be elected to the governing body of such an organization. An extensive list of data is available in 22 U.S.C. Sec. 288 - International Organization.</p>
<p>Management</p>	<p>Chief Executive Officer, Chief Financial Officer, members of the Board of Directors and its committees, heads of Companies, heads of Companies' units.</p>
<p>Employee</p>	<p>An individual who is in labor relations with the Company on the basis of a labor or civil law contract.</p>
<p>Third parties</p>	<p>Individuals or legal entities that do not have contractual relations with the Company.</p>

1. General

- 1.1. In its activities, the Company strives to comply with the highest standards of ethical business conduct. One of the Company's main strategic goals is to ensure a high level of corporate culture that will establish trustful and open relationships between employees of the Company, its counterparties and the society.
- 1.2. This Anti-Corruption Policy (hereinafter referred to as the Policy) is one of the most important documents for the Company's achievement of the stated objective and defines the key principles and requirements that the Company puts forward in relation to its managers, employees and counterparties.
- 1.3. The policy shall establish the administrative and organizational basis for preventing corruption / corrupt practices, and minimizing and / or eliminating the consequences of corruption violations.
- 1.4. The provisions of this Policy shall be binding upon all companies of QIWI Group, including subsidiaries and affiliates.
- 1.5. The Anti-Corruption Policy has been developed in accordance with the requirements of legislation and regulations:
 - United Nations Convention against Corruption as of 31.10.2003 (ratified by the Russian Federation on 17.02.2006);
 - Convention of the Council of Europe on Criminal Responsibility for Corruption as of 27.01.1999 (ratified by the Russian Federation on 14.07.2006);
 - Federal Law as 25.12.2008 No.273-FZ “On Combating Corruption”;
 - US Foreign Corrupt Practices Act as of 1977.
- 1.6. Control over the full implementation of the requirements of the Anti-Corruption Policy is vested in the Chief Compliance Officer of the Group.

2. Policies and Procedures

- 2.1. To ensure compliance with the requirements and principles set forth in this Policy and the Code of Business Ethics and Business Conduct, the Company has developed a number of internal procedures that are designed to help its employees and counterparties comply with the applicable anti-corruption legislation and business ethics standards.
- 2.2. These procedures shall be binding upon the management and employees of the Company, as well as its suppliers, agents and other persons acting in the interests and on behalf of the Company.
- 2.3. For the avoidance of doubt, the Company shall, in the process of conducting its financial and economic activities, adhere to the principle of not accepting any kind of corruption in any form or manifestation. Employees of the Company and counterparties of the Company shall, acting on behalf of, in the interests and on behalf of the Company, not commit corrupt activities in the course of the performance by such persons of their duties and contractual obligations of the Company's counterparties, respectively.
- 2.4. In particular, in accordance with this Policy, employees of the Company, its counterparties and other persons acting in the interests and on behalf of the Company shall be prohibited from offering, promising, transferring, directly or indirectly, tangible or intangible benefits in exchange for the protection, action or omission of the following persons:

- Representatives of the state;
- Public figures;
- Representatives of international public organizations;
- Other third parties.

2.5. Hospitality events, public relations events, gifts

All public relations activities, as well as hospitality events carried out by the Company, donation and receipt of gifts shall comply with the following requirements:

- not to violate the provisions of this Policy, internal regulations of the Company, as well as the norms of applicable anti-corruption legislation;
- the purpose of hospitality and gifts is not a concealed remuneration for the service, action (inaction), patronage, the granting of rights, the adoption of a specific decision on a transaction / agreement, decision or attempt to influence the recipient with other illegal activities;
- be directly related to the Company's activities (for example, with presentation or completion of business projects, successful execution of contracts, generally accepted holidays);
- Hospitality expenses and gifts correspond to the accepted business practice and do not go beyond the norms of business communication;
- be coordinated with the Management of the Company;
- the cost of hospitality and gifts on behalf of the Company shall be reasonably justified and commensurate with the significance of the event or the goals and scope of the event. The procedure for determining the value of gifts and allowable threshold criteria for the costs of conducting hospitality events and public relations activities shall be governed by the Procedure for the preparation and delivery of documents confirming hospitality and gifts, setting the limits of hospitality and gifts, given in Annex 1.
- Not to create a reputation risk for the Company, its employees and counterparties when disclosing information about this event, a gift.

Gifts on behalf of the Company, Company's employees, and Company's representatives to third parties in the form of cash, regardless of the form (cash / non-cash) and currency shall not be allowed.

Employees of the Company shall be prohibited from accepting from any third parties the gifts:

- for the commission of any actions (inaction) related to the work in the Company;
- more than the value determined by the internal regulatory document of the Company;
- in the form of cash or cash equivalents;
- in the absence of a common cause for a gift.

In order to ensure compliance with the said requirements, the Company shall monitor the conduct of public relations activities, representative events, donation and receipt of gifts.

In the event that the business customs do not allow rejection of a gift, the gift shall be subject to acceptance with simultaneous notification of such a gift to the compliance department and the accounting department (in the form of Annex 2). Employee upon receipt / planned receipt from a third party of a gift, the value of which exceeds ten thousand Rubles (as the employee believes / has reason to believe the employee shall notify the compliance department thereof no later than the business day following the day of detection. Information on gifts received and handed over

by employees shall be recorded in the Company's gift register in accordance with the procedure established by the Company's internal regulatory documents (Annex 3). The accounting department of the Company shall be liable for keeping the register of received and transferred gifts, the compliance with the information in the register shall be controlled by the compliance department.

In accordance with the legislation of the Russian Federation, donations shall not be allowed, except for ordinary gifts, the value of which does not exceed three thousand Rubles to persons who replace state posts of the Russian Federation, public offices of subjects of the Russian Federation, municipal offices, civil servants, municipal employees, employees of the Bank of Russia in connection with their official position or in connection with the performance of their official duties.

The ban on donating to persons that hold state posts of the Russian Federation, public offices of the constituent entities of the Russian Federation, municipal offices, civil servants, municipal employees, employees of the Bank of Russia shall not apply to donations in connection with protocol events, business trips and other official events.

2.6. Charitable contributions and donations, sponsorship

The Company shall not finance charitable and sponsor projects in order to obtain commercial advantages in specific projects of the Company.

Charitable activities of the Company and participation in the implementation of projects in the field of social responsibility shall be carried out in accordance with the decisions of the Company's head within the established budget. In the framework of ensuring compliance with anti-corruption, the compliance officer of the Company shall take part in the control over the allocation of funds for the specified purposes.

Employees of the Company are entitled to make contributions for charitable purposes on behalf of the Company in the form of supplying goods or services, providing technical assistance, training or financial support.

The Company shall take measures to ensure that the beneficiary of the assistance is a bona fide charitable foundation/organization, and the Company shall have no reason to believe that this fund/organization is directly or indirectly managed to benefit the civil servant or persons closely associated with it.

Employees of the Company are prohibited from receiving gifts, making contributions for political purposes, organizing entertainment for political parties/candidates for political positions on behalf of the Company.

The restrictions established by this Policy shall not apply to charitable contributions sent by the Company's employees on its behalf to third parties (including other employees of the Company), as well as for such charitable contributions sent to the Company's employees (for example, fund raising for treatment, elimination of consequences of natural disasters).

2.7. Violation of the requirements specified in clauses 2.3-2.6 of this Policy shall be allowed only in cases where the refusal to commit a corruptive action may entail damaging the health of Company's employees or employees of the Company's counterparties, as well as their close relatives. In this case, the person responsible for the violation shall, at the first opportunity, report a violation to his immediate supervisor or the Compliance Officer of the Company.

2.8. The Company shall undertake to disseminate these principles and requirements to any new subsidiaries, representative offices and joint ventures that will be established by the Company in the future, subject to the laws of the countries of business presence of these enterprises.

3. Anti-corruption Activities of the Management

3.1. The management of the Company shall consider ethical conduct of business as one of the competitive advantages of QIWI Group. In the long run, business reputation has a significant impact on the cost and sustainability of the business.

3.2. The management of the Company seeks, as an example, to support employees and counterparties in forming an irreconcilable attitude to corruption.

3.3. As part of ensuring the effectiveness of the anti-corruption system, the management of the Company carry out the organization of activities for:

- prevention of corruption – corruption avoidance, including the identification and subsequent elimination of the causes of corruption;
- fight against corruption - detection, prevention, suppression, disclosure and investigation of corruption offenses;
- minimization and / or elimination of consequences of corruption violations.

3.4. Understanding its role in the process of forming a unified corporate culture, the management of the Company shall undertake:

- To follow the provisions of this Policy in its work activities, including by interacting with shareholders, investors, counterparties, state representatives, representatives of political parties and other third parties;
- To participate in the development, introduction, implementation, evaluation and updating of anti-corruption measures, as well as key requirements and provisions of the Company aimed at reducing corruption risks.
- To encourage initiatives aimed at improving the effectiveness of anti-corruption measures in the Company.

4. Training and Communication

4.1. The Company seeks to inform the widest possible circle of people about the standards of ethical business conduct adopted by the QIWI Group, including the existing anti-corruption measures, in a timely manner. To ensure sufficient level of awareness, three main target groups are identified, which include:

- employees of the Company at all levels;
- counterparties of the Company;
- third parties involved in the business of the Company.

4.2. Employees of the Company shall regularly conduct training courses on compliance with the norms of applicable anti-corruption legislation and ethical business practices adopted by the Company in accordance with the established schedule of annual training.

- 4.3. Based on the results of these training activities, employees of the Company of all levels shall be tested to assess the effectiveness of the training activities being carried out.
- 4.4. In order to inform counterparties and third parties, the Company shall publish this Policy, the Code of Business Ethics and Business Conduct, the Code of Business Conduct of Counterparties, which is an annex to this Policy, on the Company's website in the public domain (Annex 4).
- 4.5. The Company shall inform its counterparties of the main principles and requirements of the applicable anti-corruption legislation, and also disseminate the main principles and prohibitions of this Policy to counterparties through an anti-corruption clause to be included in the contracts / agreements concluded by the Company with the specified persons. For small business transactions, the value of which does not exceed 3,000,000 (three million) Rubles, the inclusion of an anti-corruption clause in the contract is not necessary, since the counterparty, entering into relations with the Company, accepts the Code of Business Conduct of Counterparties.
- 4.6. Employees, counterparty representatives and third parties shall have the opportunity to inform the Company of any facts of violation of the provisions of this Policy by filling out the web form posted on the Company's official website: <https://corp.qiwi.com/company/violation.action>.

The information received shall be checked for each incoming message. For each reasonably justified suspicion or established fact, official investigations shall be carried out within the framework of the applicable laws of the Russian Federation and the national legislation of the Company.

5. Staff Engagement

- 5.1. All employees of the Company, irrespective of the position held, shall bear personal responsibility for compliance with the principles and requirements of this Policy.
- 5.2. All employees at the time of hiring shall sign a written commitment to comply with the requirements of this Policy (Annex 5).
- 5.3. The Company reserves the right to apply disciplinary measures commensurate with the revealed violations to employees who have been exposed to violations of anti-corruption legislation and ethical conduct of activities.
- 5.4. In addition, pursuant to the decision of the Management of the Company regarding employees who violated the above standards and requirements, an internal investigation may be initiated for each established or potential corrupt action within the limits permitted by applicable law.
- 5.5. At the same time, when making decisions on bonuses, raising the position or salary level of an employee, the Company shall take into account the results of regular inspections of the actual execution of internal procedures and the compliance with the anti-corruption requirements.

6. Control and Liability

- 6.1. In order to ensure the full implementation of the requirements of the Policy, anti-corruption control procedures shall be carried out in the Company on the main lines of business / business processes of the Company on an ongoing basis.
- 6.2. The Company shall regularly check the actual implementation of control procedures aimed at minimizing corruption risks.

- 6.3. This check can be carried out by a responsible employee of the Company appointed by the Management of the Company, provided that the independence of the auditors is ensured, or with the assistance of external experts.
- 6.4. Based on the results of the check, the responsible employee shall prepare a report, which is submitted for consideration to the Compliance Officer and the Board of Directors of the Company.
- 6.5. In the event that a potential violation of the anti-corruption legislation is revealed during the verification of the facts, the Company may initiate an internal investigation within the limits permitted by applicable law.
- 6.6. The Company shall provide a sufficient level of protection of the accounting system from committing illegal actions, including distortion and falsification of the financial performance of the Company, as well as unauthorized access to accounting data.
- 6.7. All committed financial transactions shall be conscientiously, fully and with due diligence recorded in the Company's accounting records, confirmed by primary documents and available for inspection.
- 6.8. The Company shall carry out continuous monitoring of the Company's financial and economic activities through a system of internal management accounting.
- 6.9. The Company shall continuously monitor applicable anti-corruption legislation and relevant court practice.
- 6.10. In the event that changes are made in the applicable law that directly or indirectly affect the provisions of this Policy, the Code of Business Conduct and Business Conduct and other internal documents of the Company, the responsible employees shall examine the compliance of the Company's internal documents and procedures with the amended norms.

7. Risk Assessment

- 7.1. Within the framework of risk management procedures implemented by the Company on a regular basis, an assessment of the corruption risk present in the Company's activities shall be also conducted.
- 7.2. To ensure the effectiveness of the conducted assessment of corruption risk, the Company shall consider the following factors:
 - level of corruption perception in the country of the Company's business presence;
 - level of corruption perception in the industry of the Company's business presence;
 - likelihood of corruption risks arising from certain operational activities of the Company.
- 7.3. Based on the results of the assessment, the employee responsible for conducting this assessment shall prepare a report on the basis of which a plan is made to improve the effectiveness of anti-corruption procedures. These documents shall be submitted for consideration to the Board of Directors of QIWI plc.
- 7.4. In addition, when the Company conducts mergers and acquisitions, the Company shall carry out a comprehensive assessment of the inherent corruption risk prior to the implementation of these transactions.

8. Checking of Counterparties and Payments

- 8.1. In order to reduce the likelihood of involvement of employees and counterparties of the Company in corrupt activities, responsible employees of the Company shall conduct an operative assessment of the corruption risk associated with interaction with counterparties and the performance of certain types of payments.
- 8.2. This assessment shall be carried out as part of the verification of the trustworthiness of a counterparty. Verification of the trustworthiness of the counterparty shall be carried out at a time (pre-contract with the counterparty) and on a periodic basis by the Company's Security Service for all counterparties. In this case, the periodicity of verification of the trustworthiness of the counterparty should be determined depending on the level of risk originally determined for a given counterparty.
- 8.3. The Company shall analyze the reputation of potential counterparties and their participants / shareholders for the purpose of tolerance to corruption.
- 8.4. In the event that, based on the results of this check, the counterparty has been exposed to signs of increased corruption risk, this ground cannot be considered as the only reason for refusing to cooperate with the counterparty. However, in order to fulfill the "due diligence" principle, the Company reserves the right not to enter into agreements with counterparties that were deemed unreliable by the results of the audit.
- 8.5. In order to combat corruption, the Company shall maintain a register of contracts with state-owned companies, companies with state participation. Responsible for maintaining the register is the accounting department of the company, control in terms of the information reflected in the registry shall be carried out by the compliance department.
- 8.6. The Company shall extend the basic principles and prohibitions of this Policy to counterparties by means of an anti-corruption clause to be included in the contracts/agreements concluded by the Company with the said persons. The development of an anti-corruption clause shall be carried out by the legal department of the Company with the involvement of the compliance of the unit/compliance officer, taking into account the requirements of the national legislation, this Policy. An anti-corruption clause is subject to inclusion in all concluded contracts of the Company.
- 8.7. The Company shall also exercise additional control over payments made on potentially risk contracts, as well as payments that have signs of corrupt and fraudulent activities.
- 8.8. The payment checks referred to above shall be made only with respect to the Company's own expenses and shall not affect the payments made by its customers.
- 8.9. At the same time, in order to comply with the current legislation on combating money laundering and terrorist financing, the Company shall check customer payments for signs of possible violations.

9. Interaction with Public Bodies and Employees (Including Former Employees)

- 9.1. In the event of concluding an employment contract (civil contract) with a citizen who held certain posts of the state or municipal service, within two years after his dismissal from the state or municipal service, the Company shall notify the employer / his representative at the last place of his service. The Company shall implement this principle in accordance with the requirements of national legislation.

- 9.2. The Company shall determine the list of the Company's employees who, in connection with the functions, activities and business processes performed, interact with state bodies and employees. Functional duties for interaction with state bodies and employees, requirements for compliance with anti-corruption legislation and this Policy, as well as responsibility for its compliance shall be established by the job descriptions of these employees, which are familiarized with under the signature.

10. Confidentiality and Protection

- 10.1. The Company guarantees the anonymity of the communication channels for which information is collected within the Hotline and does not intend to establish the identity of the person who provided the information, unless the person who provided the information agrees to provide additional information or in cases where this information is received by a law enforcement agency.
- 10.2. The Company guarantees that employees who refuse to commit corrupt actions will not be sanctioned, even if this refusal resulted in losses or lost profits for the Company.
- 10.3. The employee will also not be subjected to sanctions if the message about possible facts of corruption offenses was made with good intentions, but was not confirmed in the course of his verification. However, if such a message is made with malicious intent, as knowingly false, for example, for the purpose of slandering or receiving any preferences or avoiding liability, such an employee will be subjected to exposure measures in accordance with this Policy and applicable law.
- 10.4. Internal investigation procedure

Any information received by the Company's Hotline or transmitted directly to the Compliance Officer will be disclosed exclusively to the staff responsible for conducting the internal investigation. To ensure maximum objectivity of ongoing investigations when selecting responsible employees, the Company shall take into account the potential conflict of interests of the employees and the content of the incoming message.

The internal investigation shall be carried out jointly by the employees of internal security units, the compliance officer (compliance unit) with the involvement of the necessary experts from among the Company's employees to form an objective and independent opinion on the nature and mechanism of committing a corruption violation (potential intent). According to the Compliance Officer's decision, the results of the investigation, if confirmed, could be disclosed to any of the Company's employees, law enforcement agencies and the media.

Persons recognized as a result of official investigation guilty of violating the requirements of this Policy may be brought to disciplinary, including dismissal, property, civil liability, or persons recognized by a court decision as guilty of violating the requirements of the anti-corruption law, may be brought to administrative or criminal responsibility in the manner and on the grounds provided for by the current legislation, internal regulatory and organizational documents, as well as employment contracts with employees of the Company.

11. Business Expansion and Integration

- 11.1. When planning mergers and acquisitions, prior to making a decision on the feasibility of the proposed transaction, the Company shall conduct a comprehensive check of the object, including to identify signs of corruption risk.
- 11.2. The results of this audit shall be reviewed by the Management of the Company when making a final decision on the implementation of the proposed transaction.
- 11.3. If, as a result of the audit, the risk of corruption inherited by the Company after the completion of a merger or acquisition transaction and the potential economic and reputational damage to it for the Company exceeds the economic benefit of the transaction, the Management of the Company must decide not to integrate the object into the QIWI Group.
- 11.4. Regardless of the level of corruption risk to be acquired by the Company, in making a decision in favor of a merger or acquisition transaction, the Company shall, within six months from the date of signing the relevant contract, introduce into the object of the transaction a counter-corruption system similar to that adopted by the Company.
- 11.5. When establishing a joint venture, the Company shall seek to disseminate the provisions of this Policy and the Code of Business Ethics and Business Conduct to the activities of the enterprise under formation.

12. Conflict of Interest

- 12.1. Employees and the Management of the Company in the performance of their duties and / or representing the interests of the Company shall avoid situations that can lead to a conflict of interests, including:
 - in the context of making decisions on any business matters and fulfilling their duties, to be guided only by the interests of the Company;
 - not to use one's official position in private interests;
 - to avoid financial and other obligations that could lead to a conflict of interest;
 - not to hold a management position and / or position related to decision making, in competitive companies, not to form part of their board of directors or other management bodies, as well as not to have any other personal interest in the performance of such companies, including number of investments in their securities;
 - not to hold a management position and / or decision-making position in companies that are contractors of the Company and/or subsidiaries and affiliates, except for the companies of QIWI Group and its joint ventures, and not to hold office of the director of the board of directors or other management bodies of such companies.
- 12.2. When deciding on business matters and / or other issues related to the performance of their duties, employees should be guided by the interests of the Company, not taking into account their personal interests or the interests of their close relatives.
- 12.3. Employees of the Company are required to disclose information about their private interests, which may lead to a conflict with the business interests of the Company and / or potential conflicts of interest.

13. Basic Functions and Powers of the Management Bodies, Units and Employees of the Company within the Anti-Corruption System

13.1. The Board of Directors of QIWI plc shall:

- exercise overall control over the counteraction of corruption and measures taken in this area;
- participate in the formation and maintenance of an ethical standard of irreconcilable attitude to any forms and manifestations of corruption at all levels, its members are a personal example of ethical behavior;
- make decisions in terms of sponsorship, charitable activities;
- monitor compliance with this Policy, including ensuring the effective and prompt resolution of issues by other bodies in the anti-corruption system.

13.2. The Audit Committee of QIWI plc shall:

- deal with the issues of conflict of interest and other ethical issues within the scope of its authority;
- take decisions on significant issues and ongoing activities in the framework of building an anti-corruption system;
- review reports on anti-corruption work as required.

13.3. The Compliance unit/Compliance Officer of the Company in accordance with the authority and competence granted shall:

- participate in the development of a common methodology in the field of combating corruption;
- identify activities and business processes in the Company with a high level of corruption risks;
- implement measures to introduce anti-corruption procedures and activities;
- initiate carrying out of official checks in the anti-corruption field;
- notify the security units of the facts or intentions of corrupt actions by employees of the Company;
- have the right to introduce compliance representatives to the collegiate bodies that consider procurement issues, sponsorship and charitable projects;
- approve payments and expenses in the framework of the procedure for controlling gifts and representation expenses in disputable cases;
- participate in official checks in the field of combating corruption;
- prepare training materials in the field of combating corruption;
- advise the Company's employees on anti-corruption issues;
- identify potential areas of conflict of interest and take measures to manage and resolve them;
- take part in supporting the "hotline" operation.

13.4. The Internal audit service in accordance with the authority and competence granted shall:

- introduce and maintain a hotline.

13.5. Internal security units in accordance with their competence shall:

- prepare and conduct activities aimed at identifying and suppressing corrupt practices of employees of the Company;
- carry out anti-corruption expertise of documentation on the procurement procedures conducted by the Company;

- initiate carrying out of official checks in the field of counteraction to corruption;
- interact with law enforcement agencies in the transfer of materials on the identified facts of corrupt practices by employees of the Company with a view to bringing them to justice in accordance with applicable law;
- implement measures to protect the Company's employees from the influence of other persons whose actions are aimed at organizing corrupt schemes and manifestations in the Company;
- interact with the compliance unit to identify information about intentions or about the facts of committing corruptive actions by employees of the Company.

13.6. The legal department of the Company shall:

- draft, together with the compliance of the unit / compliance officer, an anti-corruption clause and ensure its mandatory inclusion into the contracts with the Company's counterparties.

13.7. The Accounting division / Financial division of the Company shall:

- approve payments and expenses under the procedure for control of gifts and hospitality (in disputable cases - with the involvement of a compliance officer / compliance unit);
- maintain a register of gifts accepted and received;
- maintain a register of contracts with state-owned companies, companies with state participation.

13.8. All employees of the Company shall:

- interact with the compliance unit on all issues of countering corruption;
- strictly observe the requirements of the legislation in the sphere of combating corruption, this Policy, as well as the principles of professional ethics and ethical standards of business conduct;
- in the performance of their labor functions or in the conduct of their activities on behalf of the Company in any country of the world comply with anti-corruption national legislation, local legislation of foreign countries and the norms of international law in the field of combating corruption, as well as the requirements of this Policy;
- within the limits of their powers, carry out duties in the field of combating corruption.

14. Final Provisions

14.1. This Policy may be amended to record new trends in corporate conduct practices, including in the event of changes in legislation requirements. In the event that certain provisions of this Policy are in conflict with applicable law, the provisions of applicable law shall apply.

14.2. In case of conflict of the provisions of this Policy with the norms of the national legislation in the territory of which the companies of the Group are registered and / or operating, the provisions of local legislation shall apply.

14.3. The Company shall place this Policy freely available on the Company's official website on the Internet, openly declares its rejection of corruption, welcomes and encourages compliance with the principles and requirements of this Policy by all counterparties, employees of the Company and other persons.

Procedure for Registration and Delivery of Documents Confirming Hospitality and Gifts, Setting Limits on Hospitality and Gifts

1. General

1.1. In order to control hospitality expenses and gifts, the Company has determined the procedure for processing and submitting documents confirming hospitality/gifts (hereinafter - the Procedure).

1.2. The provisions of this Procedure shall be binding upon all companies of QIWI Group including subsidiaries and affiliates.

2. Procedure for Establishing Limits of Hospitality Expenses

2.1. In order to control the reasonableness and validity of hospitality expenses, the Company shall apply a system for establishing and controlling the limits of hospitality expenses.

2.2. Limits of hospitality expenses shall be set taking into account the position and specificity of the activities of the employee and division, the Company's target areas of activity and key regions of the Company's business presence.

2.3. Limits shall be approved by the head of the Company on the basis of the calculated limits of the financial unit, the compliance control of the limits shall be carried out by the division responsible for maintaining the accounting records.

2.4. If there is a need to increase / reduce the size of the limit of hospitality, the existing limits on hospitality expenses shall be revised.

2.5. By the order of the head of the Company, the right to approve the actual exceeding of the limit by an operative procedure of no more than 30% of the established limit can be given to the head of the financial unit / accounting department, in disputable cases the reconciliation procedure shall be carried out with the involvement of the compliance officer / compliance unit.

3. Procedures for Control of Hospitality Expenses/Gifts

3.1. Providing funds for the purposes of hospitality expenses, purchase of gifts using corporate cards (bank cards, provided there is no corporate card system in the Company).

3.2. Based on the established limits, the administrative document shall approve the list of employees entitled to receive the funds transferred to corporate cards (bank cards) for expenses under the report, in accordance with the attachment to the administrative document.

3.3. The transfer of funds beyond the limit, for each type of expenditure, shall be carried out by order of the head of the Company or another authorized person.

3.4. In the event that the amount of payment exceeds the technical limit of the corporate card (when issued to the corporate card), payments over the limit approved by the administrative document shall be made on the employee's personal bank card.

3.5. Submission to the accounting department of the advance report with the attachment of supporting documents shall be carried out within a period not later than 3 working days after the event / purchase of the gift.

3.6. Confirmation documents for hospitality expenses and purchase of gifts shall include contracts, invoices, certificates of performed work / services, invoices, payment orders, receipts for tax purposes, meeting minutes, orders, memos (subject to obligatory submission of payment documents).

3.7. The procedure for approving payments and expenses in the framework of the procedure for controlling gifts and representation expenses in disputable cases shall be carried out with the involvement of the compliance officer / compliance unit.

3.8. An employee who has received a corporate card for use may spend the funds listed on the card strictly according to the intended purpose in accordance with the established limits.

3.9. It is prohibited to withdraw cash in cash from a corporate card (a bank card in part of the amount listed for representation expenses / gift purchases).

3.10. In the case of documentary unconfirmed and (or) unjustified, non-earmarked expenses, the accounting department shall deduct from the employee's salary within 1 month from the date established for the provision of the advance report.

3.11. The head of the accounting department shall be delegated the authority to block the corporate card in case of violation of the terms of the employee providing a full report on the previously received advance.

4. Final Provisions

4.1. This Procedure may be amended to take account of new trends in corporate conduct practices, including in the event of changes in the requirements of the law. In the event that certain provisions of this Policy are in conflict with applicable law, the provisions of applicable law shall apply.

4.2. The Companies of the Group may develop separate internal regulatory documents regulating the procedure for issuing and submitting documents confirming hospitality expenses and gifts, setting limits on hospitality expenses, taking into account the specifics of the Company's business, national legislation, subject to compliance with the main provisions and requirements of the Procedure. Within 1 month from the date of entry into the Policy, the Company is required to approve the limits of hospitality / expenses for the purchase of gifts subject to the requirements of this Policy.

Notice of Gift Receipt

1	Full name and position of the employee that received a gift	
2	Full name/ designation of the person on whose behalf the gift is given	
3	Is the donor an active client / counterpart of the Company (yes / no)	
4	Date of offer / receipt of gift	
5	Circumstances of offer/receipt of the gift	
6	Purpose (proposed) of gift offer	
7	Estimated value of the gift (in Rubles)	
8	Has the employee previously received gifts from the specified person / from other persons (yes / no)	
9	Additional comments	

_____ “ ____ ” _____ 20

Signature _____ Full name of the Company's employee

GIFT REGISTER

Date	Gift Description	Recipient (Full Name, Entity)	Donor (Full Name, Entity)	Approximate Value	Gift Justification



Code of Business Conduct for QIWI Counterparties

QIWIⁱ expects that all employees will always abide by the laws and behave ethically. We expect the same from our suppliers, partners and other counterparties. This Code of Business Conduct shall summarize the relevant requirements for our Counterparties.

With fact of entering into business relations with QIWI the Counterparty confirms that it has accepted and undertakes to comply with this Code of Business Conduct for the Counterparties.

Conflict of Interest

QIWI Employees shall act for the benefit of the Company. Accordingly, employees are not entitled to be in any financial or other relationship any Contractor that conflict or create the impression of a contradiction of the employee's duty to act in the Company's interests. In particular, the Counterparties shall not hire or make any payments for any other reasons in favor of QIWI employees in connection with the transaction between the supplier and the Company. Counterparties shall ensure that no personal relationship is used to influence decision-making by QIWI employees in the conduct of business. If the Counterparty employee is related to a QIWI employee, or if the Counterparty has any other relationship with a QIWI employee that may create a conflict of interest, the Counterparty shall notify QIWI thereof or take the necessary measures for a QIWI employee to do so.

Gifts, Treats and Entertainment

QIWI Employees shall be prohibited from accepting expensive gifts, treats and entertainment from the Counterparties. It is acceptable to accept common food during business meetings and inexpensive attention signs, but the Counterparties should not offer QIWI employees travels, frequent meals or expensive gifts. Under no circumstances there shall be allowed gifts in the form of cash or their equivalents, such as, for example, gift certificates.

Business and Financial Reporting

Both the supplier and QIWI shall maintain accurate reporting on all matters relating to the supplier's business relations and QIWI. This includes proper reporting of all expenditures and payments. If QIWI invoices are issued based on the hourly performance of the supplier's employee, the reporting of the time spent must be complete and accurate. Counterparties should not delay billing, or in any way contribute to assigning costs to another reporting period.

Bribes

Counterparties acting on behalf of QIWI shall comply with the US Foreign Corrupt Practices Act, as well as all local anti-corruption laws. In any transaction in which the Counterpart acts as a QIWI representative, or which in any way relates to QIWI, the Counterpart has no right to transfer, directly

or indirectly, any tangible or other values to any public servant, employee of the state company or institution, or political party in order to obtain any benefits or benefits.

Information Protection

Counterparties are required to protect confidential information of QIWI. Counterparties who have access to confidential information in the course of a business relationship shall not share this information with anyone unless they have received permission from QIWI. Counterparties shall not trade securities, or encourage others to do so, on the basis of confidential information received from QIWI. If the supplier believes that he has access to confidential information of QIWI by mistake, the supplier must immediately notify the Company employee through whom he is contacting QIWI and refrain from further dissemination of information.

Similarly, the Counterparty shall not share with QIWI information relating to any other company if the supplier bears a contractual or legal obligation not to disclose such information.

Reporting Possible Violations

Counterparties that believe that a QIWI employee, or someone else acting on behalf of QIWI, commits illegal or otherwise unsuitable actions, are required to inform QIWI thereof with a message to the hotline through <https://corp.qiwi.com/company/violation.action>

Undertaking to Comply with the Anti-Corruption Policy

Full name _____

Title _____

I shall undertake to comply with the requirements and restrictions established by the Anti-Corruption Policy.

I have been informed that for violating the requirements of the Anti-Corruption Policy, I can be brought to disciplinary, even dismissal, property, civil liability in accordance with applicable law.

_____ “ _____ ” _____ 20

signature

ⁱ In this document *QIWI* shall include all companies of *QIWI Group*, such as *QIWI PLC*, *QIWI JSC*, *QIWI Bank (JSC)* and other companies of *QIWI Group*