

ASSOCIATION OF CLUSTERS, TECHNOLOGY PARKS AND SEZ OF
RUSSIA

«Approved»

Annual general meeting of members of
ASSOCIATION OF CLUSTERS,
TECHNOLOGY PARKS AND SEZ OF
RUSSIA

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POLICY. IN THE FIELD OF SUSTAINABLE DEVELOPMENT ESG

Moscow
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1. GUIDELINES FOR THE CONDUCT OF ACTIVITIES

Policy - a set of principles and strategic goals of the Association of Clusters, Technology parks and SEZ of Russia (hereinafter – Association) to address environmental, social and governance issues.

Integrity and transparency - The Association develops procedures to ensure compliance with the norms and requirements of existing legislation and the best standards in the management of the organization, as well as discloses material information about itself and its activities, including public non-financial reporting, which allows for proper monitoring.

Respect for Human Rights - The Association promotes inclusiveness and diversity, provides equal opportunities, opposes child and forced labour, protects personal data, and respects labour and other fundamental human rights.

Ethics, Loyalty and Honesty - The Association provides comprehensive assistance to the development of ethics in relations with its members, partners, contractors, personnel.

Personnel Care - The Association strives to ensure safety, decent conditions and pay. Develops and implements programs to create conditions for the growth of skills and level of education of staff, the development of leisure and charitable activities, other aspects of social development of the workforce.

Concentration of intellectual and information resources - The Association influences the development of industries that can have a significant impact on the growth of socio-economic and technical potential of the regions of presence of members of the Association.

Environmental Stewardship - The Association strives to ensure responsible resource management and environmental safety of all activities and services.

Socially significant projects and programs - The Association, both through its members and through independent activities, participates in the implementation of projects and programmes aimed at:

- Involving young people in career guidance for employment;
- training of management teams of subjects of the Russian Federation in order to create and develop industrial technology parks and industrial parks;

Popularization of SME entrepreneurship in the high-tech and productive sector.

1. GENERAL PROVISIONS

1.1. On 25 September 2015, UN member states adopted the ESG Agenda 2030. It contains 17 goals aimed at eradicating poverty, preserving the planet's resources and ensuring the well-being of all. Each of the 17 Goals contains a set of indicators to be achieved within 15 years.

1.2. The Agenda 2030 is a blueprint for transformative change with 17 interrelated and indivisible sustainable development goals and targets (hereinafter referred to as the SDGs).

1.3. The list of national indicators of achievement for SDGs has been developed in accordance with UN General Assembly Resolution A/RES/71/313 of 6 July 2017 on the development of national sets of indicators for SDGs based on national priorities, local conditions and existing statistical capacity.

1.4. The national set of indicators of achievement of the SDGs reflects national characteristics and takes into account the tasks defined in the Decree of the President of the Russian Federation of 7 May 2018,204 «On national goals and strategic objectives of development of the Russian Federation for the period up to 2024» strategic documents of the Government of the Russian Federation, as well as, as well as national and federal projects.

1.5. This policy is a public document that regulates the Association's approach to ESG activities and the achievements of the SDGs and is accessible to all interested persons on the main information resources of the Association.

The main objective of the Policy is to ensure the effective and sustainable long-term development of the Association by establishing and implementing plans and activities based on the following ESG criteria:

- **Environmental protection**
- **Social responsibility**
- **Corporate governance**

1.6. The main approaches and principles in the field of sustainable development are determined by international standards on ESG issues, the legislative and ethical norms of the Russian Federation, this Policy, the Regulations on the General Meeting of Members of the Association, Regulations on the Supervisory Board of the Association, Regulations on the Director of the Association and local regulations based on them.

The Association aims to build sustainable development that is socially and environmentally responsible and that creates value for Association members and a wide range of stakeholders in the long term.

2. SCOPE OF APPLICATION

2.1. The policy is binding on all members of the Association. Directions and principles should be taken into account in the day-to-day activities of the Association, which affect interests and are related to communication with the subjects of the external and internal environment: employees of the organization, members, partners, customers, when developing and implementing regulations, projects and other documents) and during the main activities of the Association.

The document is relevant at the time of approval and can be updated, adjusted and modified in the light of changes in the strategy of the Association.

2.2. The association, within the framework of established corporate governance procedures, will promote:

- Ensuring compliance with high standards of corporate governance and responsible business practices, including increasing efficiency and awareness of sustainable development issues;
- Improved approaches to sustainable development management and performance;
- minimization of negative and increase of positive impact of activities through services and work provided.

2.3. The Association shall earnestly endeavour to ensure that the members of the

Association adhere to comparable principles of responsible conduct (business) and shall make reasonable efforts, to encourage the members of the Association to consider incorporating the relevant principles into their activities.

2.4. The Association expects that suppliers, contractors and other business partners with whom the Association works will also adhere to high standards of responsible business conduct in their activities.

3. PRINCIPLES OF THE ASSOCIATION'S ACTIVITIES IN THE FIELD OF ESG

3.1. The Association aims to build long-term partnerships with all its members and business processes and create added economic value for all participants. Sustainable development cannot be achieved without taking into account the interests of all stakeholders, such as:

- members of the Association;
- employees;
- customers;
- partners;
- contractors;
- public authorities at all levels;
- regulatory authorities;
- Associations, public organizations and unions;
- Media.

3.2. The Association constantly improves its activities, reducing the negative impact on the environment, social sphere, improving the efficiency and productivity of internal business processes.

3.3. The Association promotes the development of all spheres of the country's economy, carrying out its activities in the status of the Russian Association and observing the provisions of the legislation of the Russian Federation concerning the use of the official name «Russia» as well as words derived from this name in the name of the Association, and also carries out activities aimed at implementing the foundations of the constitutional order of the Russian Federation.

3.4. The Association develops and implements corporate culture based on ESG principles in all internal processes, increases social responsibility through training, motivation of employees, Introducing and using best practices in corporate governance and best practices to enhance corporate culture.

3.5. The Association is responsible for decisions made by its members, existing contractual obligations with partners, management decisions in the organization, paying special attention to the protection of personal data, information protection with the use of automated CRM-system.

4. ENVIRONMENTAL POLICY. ENVIRONMENTAL FACTOR.



The implementation of the environmental policy includes the following activities and activities:

- 4.1. Ensuring compliance with environmental requirements, national and international legislation, norms and requirements, in particular compliance with the federal law of 24.06.1998 89-FZ «On waste of production and consumption»;
- 4.2. Use of energy-saving technologies and equipment;
- 4.3. Promoting the digitalization of business processes, reducing the use of paper and moving towards electronic digital media;
- 4.4. To reduce the overall level of waste generation by analysing the sources of waste generation, developing and implementing ways to prevent the generation of waste where possible, including through the sorting and recycling of waste.
- 4.5. Participation in mass events aimed at cleaning up the territories of waste and garbage.
- 4.6. Active participation in supporting and implementing projects and activities aimed at the preservation of the environment and the regeneration of natural resources.
- 4.7. Increased environmental awareness and participation of the Association's staff in the implementation of the Policy.
- 4.8. Promotion of environmental and sustainable development policies, using ESG principles among the Association's external and internal environment stakeholders through direct dialogue and using existing information resources.

5. SOCIAL RESPONSIBILITY POLICY.



The implementation of the social responsibility policy includes the following activities and activities:

5.1. Non-discrimination.

6.1.1. Prohibition of restrictions on labour rights and freedoms or any advantages on the basis of sex, race, colour, nationality, language, origin, property, family, social and official status, age, place of residence, attitudes to religion, belief, membership or non-affiliation with public associations or any social group, as well as other circumstances unrelated to the employee's professional qualities.

The company adheres to these anti-discrimination principles in all its activities, including recruitment and dismissal, career planning, salary determination, suppliers and contractors.

6.1.2. Ensuring equal conditions for professional and personal growth, maintaining health and promoting a healthy lifestyle among employees.

5.2. Human rights.

6.2.1. Respect for human rights. The Association avoids and prevents human rights violations and addresses adverse human rights impacts.

6.2.2. The responsibility to respect human rights extends to internationally recognized human rights, which are understood to mean the rights enshrined in the International Bill

of Human Rights and the principles relating to fundamental rights, International Labour Organization Declaration on Fundamental Principles and Rights at Work.

6.2.3. The Association undertakes to avoid or promote adverse impacts on human rights in its activities and to remedy such impacts where they have occurred.

6.2.4. Prevention or mitigation of adverse human rights impacts that are directly related to its activities, products or services as a consequence of its business relationship, even if it has not directly contributed to such an impact.

5.3. Global health and safety at work.

6.3.1. The Association undertakes to ensure safe and favourable working conditions to prevent occupational injuries and health damage, to comply with legislative and other requirements in the field of health and safety at work, including in accordance with ISO 45001 and the Federal Law On the Fundamentals of Labour Protection in the Russian Federation».

6.3.2. Ensuring appropriate working conditions for the Association's staff, their continuous improvement and monitoring of the maintenance of appropriate working conditions for the staff.

6.3.3. Regular training and awareness-raising for all staff in the area of safety and security at work.

5.4. Staff development.

6.4.1. Implementation of joint projects with specialized educational institutions, including the passage of student practice, including the professions of the Association, as well as targeted employment of graduates of educational institutions in the Association.

6.4.2. Conduct of seminars, refresher courses for employees.

6.4.3. The association does not support forced labour, i.e. work that is not done voluntarily or that is done under threat or punishment.

6.4.4. Create an enabling environment for professional development for all Association staff, including through the creation of a pool of Association staff.

6.4.5. Striving for gender equality in staff and management.

5.5. With respect to members and partners of the Association:

6.5.1. Quality assurance of the organization of internal quality control of works and services through the introduced quality management system. The Association is certified in accordance with GOST R ISO 9001-2015 (ISO 9001:2015) for the development of documents necessary for the creation and operation of clusters, technoparks, special economic zones and other objects of industrial and innovative infrastructure.

6.5.2. Provision of services for:

- Promotion of the Interests of the Association's Members at the Federal and Regional Levels and Promotion of State Support.
- Development of key regulatory and strategic documents for industrial infrastructure facilities, clusters and special economic zones.
- Providing business contacts with interested investors and customers in Russia and abroad.

- Expert analytical support for decision-making based on the best practices of innovative and industrial infrastructure.
- Practical knowledge of the work of enterprises and infrastructure abroad.
- Expanding the Presence in the Federal and Regional Information Field.
- Finding and selecting a site for investment projects.

5.6. For socially significant projects:

6.6.1. Participation in socially significant projects aimed at popularization of entrepreneurship with the purpose of forming a positive image of entrepreneurship among the population of the Russian Federation, as well as involvement of various categories of citizens, including the self-employed, into the small and medium-sized enterprise sector, including the creation of new SME players.

6.6.2. Participation in projects aimed at assisting students of higher and secondary vocational educational institutions in full-time training in obtaining practical experience, additional knowledge and skills necessary for employment at enterprises - members of the Association in the constituent entities of the Russian Federation.

6.6.3. Interaction with members and partners to facilitate their development based on ESG principles.

6. CORPORATE GOVERNANCE POLICY.



Implementation of the corporate governance policy includes the following activities and activities:

6.1. Code of Conduct for Partners.

7.1.1. Respect for the interests of partners through the formulation of specified terms and frameworks for partnerships. We act so that all parties are protected from dishonest acts in commercial and non-commercial activities.

7.1.2. Application of ESG principles in the management of its financial resources and assets.

7.1.3. Following the principles of responsible financing and competitiveness through an open economic model, helping to transform ESG counterparties.

6.2. Ethics and anti-corruption.

7.2.1. The Association pays special attention to the creation and maintenance of good reputation, as well as to the limitation and control of reputational risk. Resolutely opposes corruption and in its activities does everything to prevent the possibility of promising, giving, requesting, receiving or accepting a bribe. An association is not allowed to have a personal (direct or indirect) material or intangible interest in an employee who performs financial transactions or any other actions on behalf of the Association making decisions within the scope of his or her responsibilities.

7.2.2. The Association operates within the framework of the legislation of the Russian Federation, which determines the cases and actions when an employee can accept or give gifts to clients and cooperation partners, provide them with hospitality or make donations.

By establishing clear principles and procedures for employees, the Association prevents employees, customers and business partners from being compromised.

6.3. Strict compliance with the norms and principles of the law.

7.3.1. Strict adherence of the Association to the laws and tax policy of the Russian Federation. The Association is open to cooperation and maintains a constructive dialogue with government agencies at all levels, helps to build long-term relationships and enhance the reputation of the Association.

7.3.2. Enforcement of legislation to counter corruption and prevent financial crimes.

7.3.3. Ensuring the fulfilment of commitments to Association members and partners.

7.3.4. Implementation of an internal growth policy consisting in the construction and implementation of career plans for vacancies with the priority of promotion of internal candidates both upwards in the career and in the development of competencies, also opportunities to change jobs with further employment in the organization of members of the Association and the organization of partners.

7.3.5. Establishment of a system of clear performance indicators that make it obvious to all employees of the Association actions leading to personal success.

7.3.6. Involvement of the Association's employees in strategic sessions to develop an informed and responsible attitude.

7.3.7. Interaction of the Association with the state authorities of different levels to connect the development strategy of the Association with the development goals of the constituent entities of the Russian Federation and the country.

8. SET OF INDICATORS TO 2030 FOR THE SDGs.

Goal	Indicator
Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in the life of the Association	Percentage of women in decision-making positions
Ensure universal and equitable access to safe and free drinking water for all Association staff, %	Percentage of staff provided with high-quality and free drinking water from potable water coolers and heaters, %
Ensure universal and equitable access to adequate sanitation	Percentage of staff using secure sanitation services, including hand-washing with soap and water
Promote decent jobs for youth	Percentage of youth employed in the Association, %
Ensure gender balance of staff employed in the Association	Employment rate by sex, %
Ensure equal pay for women and men employed in the Association	Real average monthly wage (% of the previous year)
Reduce waste through prevention and reduction	Solid municipal waste (% year before)

<p>To ensure public access to public information about the Association's activities, respecting the basic principles of open data.</p>	<p>Compliance of indicators of openness and availability of information on the resources of the Association:</p> <ul style="list-style-type: none">• Credibility;• Relevance;• Completeness;• Availability;• Primacy.
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