

Approved by
The Board of Directors of Delimobil Holding S.A.
at the Meeting held on 3 September 2021

Chairman of the Board of Directors
Mr Vincenzo Trani

Deliprinciples

Table of Contents:

Statement from the CEO

Basic terms and definitions

What are Deliprinciples?

Mission and values

Who we are

Teamwork

Working atmosphere and communication

Relations with clients

Relations with partners

Attitude toward company resources

Compliance with applicable laws

Resolving conflicts of interest

Data accounting and reporting

Compliance with Deliprinciples by external partners

Reporting violations

Final provisions

Dear Team:

Delimobil now has a guide to the Company's rules that reflects our values—the Code of Business Conduct and Ethics, which we call Deliprinciples.

We have developed rapidly over the years; we have moved forward in our own unique way and created our internal corporate culture. Deliprinciples are based on this experience. They were developed by a team comprising members from various departments, and they are based on our personal experience. In my opinion, the result is extremely sincere and authentic.

I follow Deliprinciples, and I believe that you will share them and apply them too when working with colleagues and partners, launching new projects, and solving even the most complex tasks.

Elena Bekhtina, CEO of Delimobil

Basic terms and definitions

"Close Relatives" means spouses, parents, children, adoptive parents, adopted children, siblings and half-siblings (who share one parent), grandparents, and grandchildren.

"External Partners" means suppliers of goods and providers of various services as well as corporate users of our service.

"Hotline" means a channel for transmitting information created for the purpose of registering, storing, and processing messages about possible violations, known facts, or suspicions indicating violations of applicable law, the Code of Business Conduct and Ethics, and other Company policies and procedures.

"Prohibited Conduct" means fraud, corruption, coercion, collusion, negligence, money laundering, and terrorism financing as well as any other illegal actions in accordance with the Anticorruption and Antifraud Policy.

"Client" means any legal entity or individual/consumer of services with which the Company enters into the corresponding contractual relationship.

"Company" ("Delimobil") means Delimobil Group of Companies (Delimobil Holding S.A.), including its branches, structural divisions, and controlled entities.

"Confidential Information" means documented information that requires protection and has limited access in accordance with the applicable legal requirements as well as Company policies and procedures.

"Conflict of Interest" means a situation in which the personal interest (direct or indirect) of the Employee (including their Close Relatives) affects or may affect the proper performance of their official (job) duties, and in which there are or may arise contradictions between the Employee's personal interest and the rights and the legitimate interests of the Company that could lead to harm to the rights and legitimate interests, property, and/or business reputation of the Company.

"Personal Data" means any information relating directly or indirectly to a specific or identifiable individual.

"Employee" means an individual who enters into an employment relationship with the Company on the basis of a concluded employment contract.

What are Deliprinciples?

These are tips for carrying out efficient work in a comfortable environment at Delimobil. The Code describes the principles by which we live and our guidelines for making any decisions.

We are one team; therefore, the Code of Business Conduct and Ethics (the "Code") applies to all Employees (including managers) and members of the Board of Directors of the Company. Please make an effort to remember and follow the Code as it will help you in resolving disputes and improving business processes.

This Code is designed to strengthen the Company's business reputation, promote fair and ethical business conduct, and prevent abuse and violations of the law. Despite the fact that the Code is a set of rules and restrictions, it does not infringe upon or in any way limit the legitimate rights and interests of the Employees.

Your actions also contribute to the Company's reputation or can expose it to unacceptable risks. Therefore, when making decisions and taking actions, you should ask the following questions:

- Is it legal?
- Is the decision/action consistent with the Code and other Company policies and procedures?
- Is this action/decision in the interests of the Company?
- Have you received reliable and sufficient information and consultations from the responsible persons for making the decision/taking the action?
- Does this decision/action expose the Company to any unacceptable risks?
- How will it be perceived if the general public finds out about the decision/action?

If you are having difficulty answering the above questions or in doubt about how to act in a particular situation, you should contact your immediate supervisor, the Employees from the HR Department, or other relevant Employees, depending on the matter at hand.

Remember, it is best to consult with the relevant Employees before making a decision/taking an action.

Do you know how to improve the Code? Do you have any questions or suggestions? Contact your manager or send an email to code@delimobil.ru.

That should be all. Let's get the ball rolling! 😊

Mission and values

- We are creating a sharing community and developing an effective business.
- We work every day to make our customer service better.
- We are developing our product.
- We make the customer journey as convenient and enjoyable as possible every day.

Be socially responsible

The desire to change the world always begins with changes from within. How do we make the city safer and easier to get around, and how do we make sure drivers are polite and respectful? Of course, we should start with ourselves.

Surpass yourself

The best and boldest ideas don't come from anywhere. You always have to fight for them with the most difficult rival—yourself.

Share

In real life, "sharing" is totally different from "dividing." The more you give, the more you receive: from inspiration to confidence, from support to motivation.

Who we are

We focus on the result rather than the process

We get our kicks from taking on challenging tasks nonstop.

There is no such thing as an impossible task. Every problem has a solution.

We are always looking for the most effective solutions.

The efforts and actions taken by all divisions are aimed at achieving the Company's main goals.

We are ready for change

We know and keep in mind that solutions are not set in stone. A rule or decision can always be changed if they are no longer relevant, and this change is going to benefit the Company.

We are drivers of change, we are raring to go, and we are looking for new challenges.

Together, we can change the world

We work to change habits, lifestyles and make dreams come true!

We don't run from problems, we face them head on

We go straight to the root of the problem instead of focusing on eliminating its consequences.

We evaluate actions, not people.

We learn new lessons and do not disparage the lessons learned.

We think proactively

We expect success, but we always have a plan B (as well as a plan C, plan D, etc. 😊).

Intuition and experience are great, but we base our decisions on reliable data.

Teamwork

We are a team!

We see a team as a group of colleagues who work together to achieve common goals and share responsibility for achieving results.

Our teams can be both mono- and cross-functional, and they can both function on a permanent or temporary basis. Therefore, you can be a member of several teams at the same time.

When working on a team:

- Evaluate the actions rather than the person, look at the goal as a whole, and think about achieving the goals of the team.
- If you offer criticism, make sure it's constructive. If you make a suggestion, act on it.
- Share responsibility with your team members. Be ready to take the lead; this is always encouraged.
- Give honest and objective feedback openly, and accept feedback calmly.
- Remember that the team's result depends on each participant.

Principles of effective teamwork:

1. Set clear and achievable goals.
2. You should know how to listen and hear your team members.
3. Try to understand and accept different points of view.
4. Provide support and assistance to team members.
5. Record the results and agreements reached after each team meeting.
6. If a team member deviates from the topic/goals/results or repeats what has already been discussed many times, draw their attention to this fact and get back to the topic of discussion.

For managers

If you manage a team, remember that an effective leader is one who sets an example.

Respond to requests from your team and colleagues, maintain an atmosphere of trust.

The result of your team is your responsibility.

Resolving conflicts

Conflicts get in the way of achieving goals! If any conflict arises, do your best to resolve it. Remind all participants of the overall goals of the Company and their paramount importance.

There are several ways to resolve the conflict; any can be chosen depending on the situation:

1. On your own
2. With the participation of the team
3. With a mediator—that is, with the participation of a third party (for example, you might ask your manager to mediate the situation)

Working atmosphere and communication

We strive to create and maintain a friendly and respectful atmosphere in the team.

- We do not allow any form of discrimination.
- We do not tolerate harassment—that is, behavior that interferes with the work of another person or degrades their dignity (physical actions or verbal remarks, offensive emails or messages in instant messengers or social media, etc.).
- As a Company, we put aside politics and religion. We do not participate in any religious or political activity. Any advocacy of political or religious beliefs on the part of the Employees during working hours is unacceptable. Each Employee may express their political and religious views outside business hours solely as an individual and not as a representative of the Company.

We always communicate with colleagues in a respectful and friendly manner.

Relations with clients

Our Clients are an integral part of our business.

We respond quickly to Client feedback.

We identify the need for new products and create them with the whole team.

We make the service more convenient.

Loyal Clients receive the best conditions.

Relations with partners

The Company has both external and internal partners.

External Partners are suppliers of goods and providers of various services as well as corporate users of our service.

An effective relationship with them is a key condition for the future development of our business.

When building relationships with partners, we adhere to the principle that no one should gain an advantage through manipulation, pressure, concealment, abuse of the Confidential Information, falsification, distortion of material facts, or any other dishonest actions. We fulfill all our obligations to partners without fail and insist on similar behavior on their part.

All decisions related to concluding contracts and procuring various types of products and services should be based on a real and fair assessment of the quality, service, and price offered. When choosing a supplier, we evaluate all factors impartially. Our decision should not be influenced by any personal interest or preference. An open tender is always held in order to obtain the best value for money.

A number of divisions in our Company provide services to other divisions that constitute internal customers.

Within the Company, there is also a "partner/client" relationship, and we also apply a client-oriented approach to all internal partners/clients/divisions of the Company. Each division performs the tasks assigned to it on time and without any violations.

Attitude toward company resources

We make sure to use any company resources in an efficient manner. Each of us strives to achieve our goals with the optimal use of resources.

Time resources

When solving a problem, try to make the most of your working hours and the working hours of your colleagues.

Material resources

Any tangible assets, including vehicles, money, equipment, and office materials, are the result of company investments.

Use them reasonably and only for the purpose of business development. Look after company assets to prevent theft, damage, or misuse.

Financial resources

Remember that all expenses in the company are planned in advance. Before launching a project, always check with your manager to make sure the Company is able to finance the project at the given time. Everyone in their respective positions should know what budget they can allow themselves when it comes to achieving goals and implementing company projects and shall not exceed these expenses.

Compliance with applicable laws

We are committed to complying with any applicable legal requirements for the Company, depending on the country of presence or operation.

We develop and implement all the necessary measures to prevent violations and inform the relevant supervisory authorities of any violations in accordance with the applicable requirements of law and the rules of the Company.

We also take into account any applicable sanction requirements—namely, restrictive economic measures related to bans on concluding contracts, carrying out transactions and other restrictions within the framework of personal or sectoral sanctions. The Employees must follow the requirements of the Sanctions Compliance Policy.

Anticorruption, fraud, money laundering, and financing of terrorism

We fully comply with the requirements of law in the field of preventing and combating corruption and fraud as well as the requirements for combating money laundering/financing of terrorism.

We do not tolerate any Prohibited Conduct as set forth in the Anticorruption and Antifraud Policy. You should be aware of and meet the requirements of applicable policies and procedures. The following is prohibited:

- Fraudulent practices—namely, any actions or omissions, including misrepresentation of facts, which knowingly or inadvertently mislead or try to mislead a party in order to obtain financial or other benefits or to avoid any obligations (in particular, it is prohibited to misuse the Company's resources or property in order to obtain benefits for oneself or others).
- Carry out or consent to illegal transfers, offers, promises of money, securities, or other property, the provision of property services, the provision of property rights to government officials or any other persons for any action/inaction for the benefit of the Company, whether directly or indirectly, personally or through intermediaries.
- Seek, demand, extort, receive, or consent to the illegal receipt of money, securities, other property, property services, the provision of property rights from any persons for any action/inaction, whether directly or indirectly, personally or through intermediaries.
- Use one's own powers against the legitimate interests of the Company and in order to derive benefits and advantages for oneself or others or harm others.
- Mediate bribery—that is, directly transfer bribes on behalf of the bribe giver or bribe taker, otherwise assist the bribe giver or bribe taker in reaching or implementing an agreement between them on receiving and giving a bribe, or take part in commercial bribery.
- Demonstrate willingness to perform the above actions.

- Create other reputational risks for the Company in the context of accepting or giving gifts, extending hospitality, or carrying out other operations in areas with high corruption risk.

We strongly prohibit actions on behalf of and/or for the benefit of the Company, involving the extension of excessive, illegal hospitality, giving, or accepting gifts from any persons in the form of cash and cash equivalents, securities, regardless of their market value, precious metals, precious stones and jewelry as well as the financing of political parties and political campaigns.

The Company complies with any applicable legal requirements aimed at combating money laundering and the financing of terrorism. The Company adopts a zero-tolerance policy toward any form of money laundering and terrorism financing. We take appropriate measures aimed at identifying the Clients as well as identifying suspicious transactions that are subject to control from the point of view of applicable legislation on combating money laundering and financing of terrorism.

Transport regulation and traffic rules

We provide car rental services and understand the importance of road safety. We strive to make our contribution to ensuring road safety, and, despite the fact that transport regulation does not directly apply to the Company's activities, we have taken on additional obligations and create all the necessary conditions to ensure that Clients comply with traffic rules, including the following:

- It is only possible to rent a vehicle if you have a driver's license of the corresponding category.
- We notify all Clients of the need to comply with traffic rules as well as of their liability for traffic violations.
- We take appropriate restrictive measures (including a ban on the use of vehicles) in relation to the Clients who commit traffic violations, breach contracts, and violate other Company rules and restrictions.

We expect our Employees to also abide by the established rules and restrictions.

Consumer rights protection

We comply with the requirements of applicable consumer protection legislation and provide services of adequate quality that are safe for health, our Clients, and the environment.

We have implemented all the relevant requirements to ensure that the rights of the Clients are respected, including those of the Employees:

- Accurate and complete information must be given about the services provided and their quality as well as the rules for their effective and safe use, tariffs, and restrictions.
- It is prohibited to deceive or cheat the Clients.

- Only conditions that meet the requirements of applicable law and do not violate the rights of the Clients should be included in the contract.
- Any complaints or claims from the Clients must be reviewed and documented as well as resolved.
- It is prohibited to unreasonably refuse services to the Clients, if such cases are not stipulated in the applicable laws.

Antitrust laws

We adhere to the principles of fair and bona fide competition and comply with the requirements of the applicable antitrust laws depending on the country of presence or operation.

During the performance of their duties, the Employees are strictly prohibited from:

- Entering into any (including oral and written) negotiations with competitors, concluding agreements with them aimed at establishing/maintaining prices, margins, allocating the service market on a territorial basis, creating obstacles to access or entry to the service market by other companies and other ways of limiting competition
- Discrediting competitors and disseminating false, inaccurate, or distorted information that may cause losses to competitors or damage their business reputation
- Misleading the Clients about the quality of the services provided by competitors
- Illegally using designations that are identical to a competitor's trademark, company name, commercial designation as well as a name similar to the name of competitors (including copying or imitating competitors' trademarks)
- Illegally receiving, using, or disclosing information constituting a commercial, official, or another legally protected secret of a competitor
- Carrying out other actions that are aimed at obtaining benefits in doing business that are contrary to the requirements of applicable antitrust laws

We promptly notify the antitrust authorities of any transactions subject to state control in the country where the Company operates, and we obtain approval for any transactions in accordance with the requirements of the applicable antitrust laws.

Confidentiality and use of insider information

We strive for information transparency. That said, information disclosure can be carried out only in cases of compliance with the following conditions:

- The dissemination of information will not violate the requirements of applicable laws (including the requirements of applicable laws on the use of insider information).
- The information is not confidential, and its dissemination is permitted in accordance with the Company policies, procedures, and other documents.
- Information is disclosed only by the authorized Employees in accordance with the Company's Communications Policy.

The Employees who have access to the Confidential Information (including insider information) are not allowed to use this information for illegal purposes or purposes that are not related to their work, disclose this information to other persons, including the Close Relatives, unless such disclosure is permitted by the requirements of applicable laws and also by the Company's policies and procedures.

The Employees who have access to the Company's insider information must not carry out transactions with the securities of the Company, nor recommend/advise third parties, including the Close Relatives, to carry out such transactions. Requirements and restrictions on the use of insider information are set out in the Insider Information Policy.

In the event of a request from media representatives, the Employee must forward the request to the authorized Employee in accordance with the Company's Communications Policy at the address Press@delimobil.ru.

Personal data protection

We are responsible for the collection and processing of the Personal Data—namely, any information relating directly or indirectly to a specific or identifiable individual.

We ensure that the requirements of applicable laws on the protection of the Personal Data are properly complied with. The Employees must comply with any applicable requirements for the processing, protection, and dissemination of the Personal Data in accordance with the requirements of the Personal Data Protection Policy.

We only process the Personal Data according to the following requirements and restrictions depending on the country of presence or operation of the Company as well as in accordance with applicable laws:

- The Personal Data are processed in accordance with the requirements of applicable law.
- Where applicable, the Personal Data are processed only with the consent of the individual to the processing of their Personal Data.
- The Personal Data are processed only for a legitimate purpose and in compliance with the rights and legitimate interests of the individual that is the owner of the Personal Data.

- When processing personal data, their accuracy and timely updating are ensured, where necessary, in accordance with the requirements of applicable law.
- Where applicable, the Personal Data are stored in a form that makes it possible to determine the owner of the Personal Data for no longer than required for the purpose of processing personal data unless the storage periods for the Personal Data are established in applicable laws. The Company ensures the timely destruction or depersonalization of the processed Personal Data based on achieving the goals of their processing and in accordance with the applicable legal requirements.
- Cross-border transfer of the Personal Data is only possible, provided that conditions are provided to ensure an appropriate level of protection of the transferred Personal Data, and only if this is permitted in accordance with the requirements of applicable law.
- The Personal Data are processed taking into account the mandatory measures for their protection (including the implementation of software, technical, and other means/measures to protect the Personal Data).

Access to the Personal Data of individuals can be provided to the Employees only on a need-to-know basis.

Resolving conflicts of interest

We expect each Employee to be guided primarily by the interests of the Company in their professional activities, perform their job duties properly and adequately, and not compete with the Company. We have introduced the corresponding procedures to identify, prevent, and resolve the Conflicts of Interest as we are aware that such conflicts can affect the Employee's proper and professional performance of their job duties.

The Employees must inform their immediate supervisor, authorized Employees of the HR Department or the Compliance and Economic Security Department, in accordance with the established procedure, about a possible Conflict of Interest—that is, about a situation in which the personal interest (direct or indirect) of the Employee (including their Close Relatives) affects or may affect their proper performance of their official (labor) duties, and in which conflicts arise or may arise between the personal interest of the Employee and the rights and legitimate interests of the Company that can lead to harm to the rights and legitimate interests, property, and/or business reputation of the Company.

The Employees should consider the requirements for resolving the Conflicts of Interest and refrain from making key decisions in the case there is a potential Conflict of Interest.

Data accounting and reporting

We must ensure accurate financial, tax, and management accounting since accounting is an important source of data for decision making at all levels of the Company as well as for investors and regulators.

We implement appropriate measures and internal controls to ensure transparency of transactions as well as fully comply with the applicable financial and tax accounting requirements.

It is important to remember the following:

- All Company records must contain complete, accurate, and reliable information and comply with the applicable legal requirements as well as Company policies and procedures in the field of record keeping.
- All transactions must be recorded in a timely manner, accurately, correctly, and with a sufficient level of detail. Falsification of documents or records in financial reporting, tax accounting, and other reports is not allowed.
- The Company will not record or reconcile incomplete, inaccurate, or misleading (falsified) documents and transactions. The Employees must provide the necessary documents and reports in a timely manner and in accordance with the requirements of the Company's policies and procedures.

We disclose any necessary information and reporting in accordance with the applicable laws on financial reporting, tax accounting, and other applicable requirements.

We also disclose and provide the required data, reports, and explanations to external and internal auditors as well as internal control specialists in a timely manner and in full.

Compliance with Deliprinciples by external partners

We expect our External Partners to comply with the provisions and requirements of this Code, including when they act on behalf of and/or for the benefit of the Company. The basic rules include, among other things, the following main requirements:

- Compliance with the requirements of applicable laws, rules, and restrictions established by the Company
- Maintaining transparent, accurate, and reliable data records and reporting
- Compliance with the requirements for the protection of the Confidential Information and the Personal Data. The External Partners must not disclose or use the Confidential Information and the Personal Data for purposes not specified in the relevant agreements
- Reporting any violations by the partner's employees or the Company's Employees of the requirements of this Code, the terms and conditions of contracts, and other Company policies and procedures, specifically to the Company's Hotline

Reporting violations

We encourage the Employees of the Company to report any violations/possible violations of the Code of Business Conduct and Ethics to their immediate supervisor, the Employees of the HR Department, Compliance and Economic Security Department, Legal Department, or other authorized Employees, depending on the type of possible violation, as well as to the Hotline located at www.delimobil.com and under the following phone numbers:

Russia: 8800-100-9675

United States: 800-916-7037

United States (ES): 855-765-7249

United States (FR): 877-591-3211

Canada: 800-916-7037

Canada (FR): 877-591-3211

UK: 800-652-3673

Germany: 800-180-2137

France: 080-091-4677

China: 400-120-0690

Japan: 053-112-2792

Luxembourg – to be added.

Company Identifier: 35625.

We warrant and represent as follows:

- Considering and taking appropriate decisions with regard to any messages received by the Hotline
- Informing about the results in cases where contact information is provided
- Maintaining the confidentiality of reports of violations and the terms of their review
- Avoiding any retaliatory action/discrimination against the Employee or any other person who has made a good faith report of a violation or potential violation

Final provisions

Please keep in mind that any violations of the Code will be investigated in accordance with the applicable legal requirements and Company policies and procedures. Delimobil Holding S.A. reserves the right to take appropriate disciplinary and other measures within the laws in cases of violation of the requirements of the Code by Employees, External Partners, and members of the Board of Directors.

Deviations from the Code may be allowed in specific situations and only in exceptional cases upon additional approval by the Board of Directors of the Company. Such exceptions and deviations from these rules must be publicly disclosed in accordance with the applicable legal requirements and the Company policies and procedures.

This Code may be revised as necessary (at least once a year). You can find the current version of Deliprinciples on Delimobil's official website. They have been approved by default by all the organizations controlled by the Company, and they meet the requirements and restrictions set by the applicable laws.

That should be all. Now, you know Delimobil's core values and our rules and guidelines. All that's left to do now is to maintain a comfortable atmosphere within the team and contribute to the Company's development in accordance with the Deliprinciples.