

We expect our employees and Board members to comply with the set of rules outlined in this Code of Conduct. Any violation of these rules may entail negative consequences both for the employee and the company. If infringement of this Code also happens to violate the law, it may result in a legal case.

In addition, we expect that our constant contractors, as well as companies and individuals temporarily collaborating with Yandex, will abide by the principles described in Section 8 in the course of their work with us. Failure to follow these principles will eliminate any possibility of continued collaboration with Yandex.

1. We Work For Our Users

As you know from Yandex's mission statement and various internal documents, our core principle is to make services for people, for millions of internet users. It is critical that each of us follows this principle. This means, among other things, that the first thing a service manager should care about is the usability of their service. We expect every employee to feel responsible not just for their part of a project, but for the product as a whole. Take user feedback seriously. Don't be shy to suggest improvements. If you detect a bug or an error on any Yandex's service, please report it to the relevant manager.

Our success as a business largely depends on Yandex's high reputation and on the trust of our users. This trust is a key value of our company and our brand. Remember that many users trust Yandex with their data. These data may include personal information (such as passport details), correspondence with Yandex support specialists, information about user's friends and contacts, and more. Our internal procedures restrict access to any nonpublic personal information of our users. This information is highly confidential and can be used only according to the existing rules. If you deal with such sensitive information, it is your duty to keep it confidential and make sure that it is not disclosed or leaked.

2. Working at Yandex

Equal Opportunities

Yandex is an equal opportunity employer. We select candidates for a position based on their problem-solving competence. People get a job at Yandex because they outperform their competitors in handling tasks we give them and not because they have certain political or religious views, race, nationality, sexual preferences or anything else unrelated to their professional skills and the ability to perform their duties.

We expect our employees to take this as a given when dealing with any labour relations issues, including working conditions and compensation.

Relations with Colleagues

The same principles hold true for professional communication. Any form of harassment, abusive behaviour or jokes that make fun of an employee's gender, age, nationality, religious views, etc. is not acceptable at Yandex.

Company Property and Resources

Our employees are equipped with everything they need for work. This equipment belongs to the company. We expect our employees to use it with care. The company's resources do not come from thin air, so please do not treat them as if they were unlimited. And please respect the effort of our employees who keep our offices clean and comfortable.

While you are free to bring guests to the office, remember that you are the one who takes on full responsibility to make sure that they don't disturb anybody in the office and that no confidential information is leaked after the visit. Please note that your guests should not stay in the office unguided.

Intellectual Property

Our intellectual property includes Yandex's logo, trademarks, patents, software etc. These are important assets, and any use of them must be approved by our marketing department. If you suspect that someone is using our logo or trademarks without authorization, please contact our legal department.

Yandex also respects the intellectual property of others.

Unauthorized use of any copyrighted products may result in lawsuits and fines against both the employee charged with copyright infringement and the company, and may affect the company's reputation. If you need to use any content or software, which is not owned by Yandex, please consult our lawyers.

3. Compliance with Law

As a rule, all Yandex employees are expected to abide by the law.

Yandex complies with all applicable laws in the countries where it operates. Some features of our services may be subject to legislation in specific countries. For instance, in compliance with Turkish law, the Turkish version of Panoramic Views blurs human faces.

All Yandex employees must be aware of the legislation of each country of our presence that directly affects their professional duties, that is, the part of the legislation that regulates how the product they are in charge of can be offered in a specific country. Please consult company lawyers at the early stages of product development.

Bribery is illegal in all countries in which Yandex operates. A simple solution for avoiding problems is never to accept or give bribes. Remember that local customs or common practices do not justify a crime.

Securities Regulation

Since we are a public company (Yandex NV is listed on the NASDAQ stock exchange), we must comply with the NASDAQ rules. These include, among other things, certain U.S. laws, in particular securities regulation.

According to the U.S. federal securities laws, using nonpublic (insider) information for selling or buying securities is illegal. The information is considered insider if it is not officially published on behalf of the company in press releases, data reports and surveys, company blogs, or any other media. If you are unsure whether certain information is public, please consult our public relations department.

This means that no Yandex employee who has any nonpublic information about the company can use it to buy or sell Yandex's shares or provide this information to others who can use it in securities trading.

Read more about it [here](#).

4. Conflict of Interest

Every Yandex employee has certain obligations to the company. We expect, in particular, that in their professional activity our employees are guided predominantly by the company interests and the interests of our users. Conflict of interest takes place when personal interests (or your friends', relatives', or partners' interests) and company interests collide, resulting in making a decision or acting against the company interests.

If you are in doubt whether a certain situation entails a conflict of interest or not, consider how an outside observer would see it. Can you tell about this to your boss or colleagues? If it appears in a newspaper or on a blog, how would it affect the company?

Avoid conflict of interest and even those situations that may be perceived as a conflict of interest.

Accepting gifts from partners is just one such situation that may look like a conflict of interest. Yandex employees are not allowed to receive expensive gifts or any money equivalents such as certificates, e-money etc. Accepting discounts is not acceptable either, unless these discounts are available to everyone at Yandex. It's perfectly okay to accept inexpensive gifts, for example, flowers, fruit baskets, pens, or other kinds of promotional products, but not money. You are also free to accept invitations to business lunches or events, unless you believe that such an invitation is intended to influence your business

decisions.

It is hard to define precisely which gift is acceptable and which one is not, so discretion is recommended when you are offered a gift. For example, accepting a paper calendar is okay, but taking the latest iPhone model is not.

When considering acceptability of group gifts, for example, to all employees of a department, estimate the value of a gift per person.

We also try to follow these rules when giving gifts to our partners. We don't want our partners to feel or look like they are exposed to a conflict of interest.

Other examples of conflict of interest include:

- working for or advising a competitor company alongside your work at Yandex;
- employing a close relative to work at Yandex under your direct supervision;
- having a share in a company that is either a competitor, vendor, or customer of Yandex;
- pursuing personal financial interest in a deal you are making on behalf of Yandex.

5. Confidential Information

We have a lot of confidential information about our services or products, partners, product promotion strategies, financial results prior to their public announcement, etc. Since disclosing such information may cause serious damage to our company, each employee has to sign the Non Disclosure Agreement before they start working at Yandex.

Even if you assume that your professional duties do not give you access to any confidential information, you are still very likely to learn about Yandex's secrets. It might be an overheard conversation or a document you happened to find in a printer. Remember that you are obliged to keep confidential information secret and use it only in your professional activities.

Information Security

Some important recommendations on how to keep sensitive information secret are specified in the requirements issued by the Information security service. Complying with these requirements is essential for protecting our confidential information. If you notice suspicious activity in the company network, see signs of a malware infection, suspect that any of Yandex's services has been hacked, or know of any other information security violations, contact our information security department.

Outside Communications

If you have to answer questions about Yandex, follow common sense, recommendations of our public relations department and the Provision on Commercial Secrets of Yandex LLC. If you need to share our confidential information with a partner, do this only after they have signed the Non-Disclosure Agreement. Please make sure the NDA is signed before you disclose any sensitive information.

Do not attempt to gain our competitors' confidential information when talking to colleagues from competitor companies. We respect our competitors and try to maintain honest competition. If you have friends or close relatives working for a Yandex's competitor, please be cautious when discussing business with them.

When you interact with government authorities in the countries we operate in, follow relevant recommendations of our GR department. When communicating with officials, offer only the company's official position. If you not aware of Yandex's official position, redirect the issue to the GR department.

6. Making Contracts

There are two basic principles you must always follow when making contracts as a representative of Yandex: look for the best deal and pursue the company's interests. While the cost of a deal is undoubtedly important, many other factors, for example, the

reputation of a company we start working with, should not be underestimated.

At Yandex, we have internal procedures that define who is authorized to have access to the company funds or sign contracts on behalf of the company.

We expect all those authorized to sign contracts and have access to the company budget to be careful and considerate in spending company funds. If you sign a contract, make sure you understand and agree with every condition. Each contract must be approved by the manager in charge, our lawyers and tax specialists.

7. Accurate Company Records

Keeping Records

We assume that our employees in charge of keeping any kind of records are committed to keeping them complete, accurate and honest. Misrepresenting or falsifying data or making records in a way that can mislead the reader is unacceptable. The records and reports should also be protected and stored appropriately from the moment they are received or created.

Audit

Like any other public company, Yandex has both internal and external auditors responsible for monitoring the company's financial accounting and evaluating internal control system. If you receive an enquiry from an auditor, you must provide them with complete and accurate information free from any misrepresentation or manipulation.

8. Code of Conduct for Contractors

We expect that our contractors – suppliers, subcontractors, consultants, agents and other providers of goods or services – will abide by the following principles in their dealings with Yandex:

- Comply with all applicable laws in countries where Yandex operates
- Do not offer, extort or receive bribes, expensive gifts, or anything else that could influence business decisions, whether in dealings with Yandex staff or other companies and individuals in the course of carrying out work or providing goods or services for Yandex
- Maintain transparent and accurate accounts in compliance with all applicable laws
- Confidential information, available to contractors in the course of carrying out work or providing goods or services for Yandex, may be used by the contractor only within the framework of contractual relations
- Comply with applicable policies and procedures of Yandex when performing contracted work for Yandex
- Avoid conflicts of interest when making decisions in the framework of performing work, providing services or supplying products for Yandex
- Notify of any violations of the above-listed principles (see Section 9. Questions and Complaints)

9. Questions and Complaints

We offer a confidential hotline, through which employees, users, partners and clients can notify of any violation of the Code of Conduct. The hotline is accessible via a special form through which reports may be sent: <https://yandex.alertline.eu>.

The hotline is run by an independent company, and every report is addressed the alert investigation team. Your message will receive an identification number that you can use to track the response of our alert investigation team or to provide further information.

Questions regarding the work of any Yandex service may be submitted via the 'Contact us' link on the web page of each service.