



# “Two Capitals Highway” LLC Policy

“Two Capitals Highway” LLC (hereafter – the Company) in connection with the specifics of its activities, has two types of customers:

- Direct Customer – represented by the “Russian Highways” State Company within the Concession Agreement on financing, construction and toll operation of “Moscow – St. Petersburg highway at sections km 543 – km 646 and km 646 – km 684”;
- Final Customers – users of sections km 543 – km 646 and km 646 – km 684 (sections 7 and 9 respectively) of the M-11 Moscow – St. Petersburg highway.

In order to provide its Customers and other Stakeholders with high standards in terms of health and safety, services quality, environment protection, ethics and sustainability, the Company undertakes to respect following commitments:

## Operation & Maintenance high standards

- Ensure continuous and smooth traffic of vehicles through the Highway through the entire operation stage;
- Maintain capacity of the Highway in accordance with the requirements established by the legislation and Concession Agreement;
- Use modern technologies in the course of the Highway operation stage;
- Maintain the Highway in proper operating conditions within the whole operating period according to legal and contractual criteria;
- Render services to Users as per Legislation and Concession Agreement requirements;
- Develop, implement, maintain and continuously improve the quality management system in accordance with ISO 9001.

## Comply with ethical principles

Ensure the Company’s work on the basis of the next principles:

- “Respect”: for Stakeholders – by taking their opinion into account when making business decisions; for Customers – by providing sufficient, accurate and transparent information about the Company and provided services;
- “Honesty”: implementation and regular analysis of processes aimed at ensuring ethical and anti-corruption behavior; maintenance of trustful approach in all topics related to advertising and communications;
- “Fair competition”: the implementation of objective procedures for selecting suppliers on the basis of established and transparent criteria;
- “Obligation”: acceptance and fulfillment of the Company’s obligations to all Stakeholder;
- “Data protection”: provide to all Stakeholders guarantees regarding personal and commercial information safety by observation of principles of confidentiality and safety rules.

## Environmental protection

- Ensure the compliance with environmental legislation through the entire operational stage;
- Implement working methods aimed at energy and resources saving;
- Minimize amount of waste and maximize their sorting and recycling;
- Develop, implement, maintain and continuously improve the environmental management system in accordance with ISO 14001.



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## Health & Safety

- Strive to achieve zero occupational accidents;
- Perform works based on the results of hazards identification and risks assessment;
- Implement and achievement of identification and elimination of near misses;
- Encourage participation of Employees in the course of occupational, industrial and fire safety issues solving;
- Develop, implement, maintain and continuously improve the occupational health and safety management system in accordance with ISO 45001.

## Providing opportunities for development

- Provide the necessary conditions for training and development of the Company’s Employees;
- Ensure career growth of employees within the Company;
- Implement a system for individual assessment through the implementation of an annual appraisal;
- Increase Employees motivation to achieve Company’s objectives and plans.

The top management of the “Two Capitals Highway” LLC guarantees that this Policy is brought to the attention of each Employee, and also undertakes to implement and maintain this Policy in all departments and activities of “Two Capitals Highway” LLC.

**Chief Operating Officer  
of “Two Capitals Highway” LLC**

**Jean-Christophe Roux**