

Stakeholder communications

The stakeholders of Sovcomflot Group are institutions, organisations, or individuals whose interests are related to the activities of the Group, and which in turn have an impact on its performance.

In 2020 Sovcomflot Group actively communicated with its stakeholders, performing work in parallel aimed at expanding and developing existing platforms and mechanisms for joint dialogue. The key stakeholder groups of

the Company as well as channels and formats of communication with them are set out in the table below.

The main principles and priorities for stakeholder communications are enshrined in the Corporate Governance Code¹.

Mechanisms for stakeholder communications

Stakeholder		Mechanisms for communications
Shareholders and investors	Shareholders Investors Banks and creditors	General meetings of shareholders Presentations, conference calls, meetings between management and the investment community, analyst and investor days Publication of press releases and other materials as part of the disclosure of information on Sovcomflot Group activities Disclosure of information and reporting
Business partners	Group customers Suppliers and contractors	Meetings with clients, including industry conferences and seminars Conducting research among consumers Development of tender procedures for the procurement of goods and services Audit of suppliers in order to confirm their good faith and solvency Implementation of anti-corruption procedures Publication of market overviews
Employees	Group employees	Meetings with employees held by management of all levels and HR department representatives Notifying employees through an intra-corporate communications system Material and non-material incentive programmes Development of the training and skill improvement system for seagoing and onshore personnel Use of feedback tools, employee surveys Consideration of submissions and complaints
State	Russian legislative and executive state authorities	Participating in the activities of working groups and expert councils established under Russian state authorities
Society	Academic institutions Health care institutions Industry veterans Local population in the regions where the Company has a footprint	Charitable assistance to educational and health care institutions and veteran organisations Targeted training programmes for cadets of maritime universities Organising internships for cadets on the Company's vessels Organising internships for teachers of maritime universities Sponsoring sports events and competitions aimed at raising the prestige of the maritime profession
Russian and international professional organisations and NGOs	Industry non-governmental organisations Business associations NGOs	Participation in the activities of working groups and boards of professional non-governmental organisations Implementing joint projects with the maritime community Supporting local projects and discussing individual issues related to the Company's activities

¹ The new version was approved by the PAO Sovcomflot Board of Directors decision dated 10 November 2015, Minutes No. 149.

Stakeholder	Mechanisms for communications	
The media	Print publications Electronic media (including television, the internet, and radio)	Regular publications in the media of materials dedicated to important events in the Group's activities Organising interviews with management Press conferences and other events for media representatives Participation of Group representatives as experts during the preparation of topical subjects on navigation issues in the Arctic region, development trends in various freight market segments, and shipbuilding

PAO Sovcomflot did not receive government support, including subsidies.

Information policy and transparency

Sovcomflot takes a responsible approach, ensuring that information is disclosed in a timely and accurate manner and adhering to the principles of promptness, accessibility and objectivity.

In 2016 the PAO Sovcomflot Board of Directors approved the **Regulations on Information Policy** pursuing the following main goals:

- protecting the rights and legitimate interests of the Company' shareholders and potential investors, professional participants in the securities market, government authorities and other stakeholders in obtaining timely and accurate information about the Company, which is essential for making balanced investment and management decisions;
- enhancing the Company's information transparency;
- improving the level of trust in relations between the Company and its shareholders and stakeholders;
- complying with the requirements of international and Russian legislation concerning mandatory disclosure of information by a joint-stock company.

Information subject to mandatory disclosure according to regulatory requirements

In 2020 the Company's Executive Board approved the Information Disclosure Regulations of the Company taking into account the requirements of the Bank of Russia Regulations on Information Disclosure, rules of the Moscow Exchange, current legislation on the protection of insider information and other regulations governing information disclosure.

The Company's Charter and internal documents, annual and quarterly reports, annual and quarterly accounting (financial) statements under RAS and consolidated financial statements under IFRS, issue documents, information statements, data about affiliates and other information which

may have an impact on the price of **Company's securities are published on the Company's official website** and the portal of **Interfax - Corporate Information Disclosure Centre**.

To ensure that Russian and foreign shareholders are treated equally, the Company discloses financial results of the Group in Russian and English. Conference calls and meetings with institutional investors are held. Representatives of the Company take part in investment conferences. For more detailed information about the mechanisms for interaction with investors see **the relevant section of this Report**.

71
information
messages

were published
by Sovcomflot in
the news feed on
the information
disclosure portal in
2020