

**SBERBANK OF RUSSIA
OPEN JOINT STOCK COMPANY**

APPROVED BY
the Order of the Management Board
of Sberbank of Russia OJSC
Minutes No. 441 §10a dated January 24,
2012

January 24, 2012

No. 2396

**POLICY
for Corporate Social Responsibility
of Sberbank of Russia OJSC**

Moscow
2012

IRD Details:

<i>IRD name and number</i>		Policy for Corporate Social Responsibility of Sberbank of Russia OJSC (Version 1) No. _____	
<i>Division responsible for IRD development</i>		Strategy and Development Department	
<i>Responsible for IRD execution</i>		D.A. Shuvalov, 11-697, S.S. Babayev, 10-697	
<i>Business line code</i>			
<i>IRD applies to the following divisions</i>	<input checked="" type="checkbox"/>	Headquarters	
	<input checked="" type="checkbox"/>	Regional banks	
	<input checked="" type="checkbox"/>	Branch offices	
	<input checked="" type="checkbox"/>	Business units	
<i>Top level IRD</i>		-	
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<i>Version No.</i>	<i>Order document which approves/amends IRD</i>		
1			
<i>IRDS invalidated with the issue of this IRD</i>			
<i>IRD distribution</i>			
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<input checked="" type="checkbox"/>	Headquarters units		
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CONTENTS

<i>1. General Provisions. The Bank's CSR Goals and Objectives</i>	<i>4</i>
<i>2. Policy Goals and Objectives</i>	<i>4</i>
<i>3. General Principles of the Bank's CSR Activities</i>	<i>5</i>
<i>4. The Bank's risks related to corporate social responsibility</i>	<i>6</i>
<i>5. Definition and Classification of Stakeholders</i>	<i>6</i>
<i>6. The Bank's Social Corporate Responsibility Priorities</i>	<i>8</i>
<i>7. Organization of Corporate Social Responsibility Management</i>	<i>9</i>
<i>8. Corporate Social Responsibility Reporting</i>	<i>11</i>
<i>Appendix No. 1 (List of Terms and Definitions)</i>	<i>12</i>
<i>Appendix No. 2 (List of Abbreviations)</i>	<i>14</i>
<i>Appendix No. 3 (List of Documents Used)</i>	<i>15</i>
<i>Appendix No. 4 (Distribution of CSR Functions)</i>	<i>16</i>

1. General Provisions. The Bank's CSR Goals and Objectives

1.1. Sberbank of Russia OJSC (hereafter the “Bank”) has the following goals and objectives regarding its corporate social responsibility (hereafter “CSR”):

The Bank’s CSR is a series of principles and obligations the Bank is governed by while carrying out its activities as it pertains to:

- Management of relations with the stakeholders
- Evaluation and management of its impact on the national economy, social sphere and environment.

The Bank’s CSR goals are:

- Integration of the Bank’s Mission with the goals and objectives of the Bank's Development Strategy.
- Consolidating the Bank’s competitive edge by creating an image of a socially responsible company, in particular, in connection with the development of its international activities.
- Control over, and management of, the Bank’s reputation risk level as it pertains to CSR-related matters.
- Participation in the creation of new markets of environmentally and socially oriented products and services.
- Enhancement of employee loyalty by expanding their involvement in the resolution of socially significant issues.

1.2. The Bank’s CSR objectives:

- Integration of CSR principles in the Bank’s activities.
- Capitalization (attaining an additional positive effect) of the Bank's social activities and increase of its brand value.
- Improvement of the Bank's CSR activity management by organizing system-based work. Organization of a planning process for operations and enhancing the cost efficiency of its implementation.
- Creation of mechanisms for defining and accounting for the stakeholders' interests in the Bank’s activities, and notifying the stakeholders of the results of the Bank’s CSR-related activities in compliance with best international practice.

2. Policy Goals and Objectives

2.1. The goal of the Bank’s CSR Policy (hereafter the “Policy”) is to establish the fundamental standards, principles, rules and approaches to be met by the Bank in organizing and managing its CSR.

2.2. The Policy objectives are to define:

- The Bank’s CSR priorities
- The main stakeholders
- The Bank’s main CSR risks
- The approach to managing the Bank's CSR activities and to establishing a culture of socially responsible conduct.

2.3. In resolving its CSR objectives, the Bank is governed by its Mission, the Bank's Development Strategy, and it applies the international code of conduct and principles set forth by

international standards for CSR and sustainability. ISO 26000, AA1000. The Bank's approaches to CSR reporting are based on the information disclosure standards developed by GRI (Global Reporting Initiative).

2.4. The Bank views its adherence to the international CSR standards as a prerequisite for ensuring the Bank's compliance with best international practice and attaining the goals and objectives of its development.

2.5. The provisions of this Policy shall be binding on all the Bank's employees as it pertains to interaction with the stakeholders, planning and performance of their activities, development of internal regulatory documents (policies, regulations, procedures, flow charts, standards, etc.), distribution of information and other types of communication.

2.6. CMSA, ITD, units supervising the subsidiaries and affiliates, and representatives of the Bank in its subsidiaries and affiliates and subsidiary banks shall, within the scope of their competence, initiate development and approval of CSR internal regulatory documents of the subsidiaries and affiliates, and subsidiary banks subject to the provisions of this Policy, exert control over compliance therewith, and ensure preparation and timely submission to the Bank of information required to draw up consolidated corporate social responsibility reporting.

3. General Principles of the Bank's CSR Activities

The implementation of the Bank's CSR Policy and building of relations with the stakeholders are based on the following social responsibility principles defined by ISO 26000 international standard:

Principle of Accountability

The Bank is aware of the need for regular reporting on the impact its activities have on society, the economy and environment. The Bank considers constructive criticism of the stakeholders as a source for the improvement of its CSR-related activities and assumes an obligation to respond to such criticism, including by taking measures to prevent repetition of unintentional and unforeseen negative impacts.

Principle of Transparency

The Bank strives to ensure the transparency of its decisions and activities that have an impact on society, the economy and environment.

The Bank strives reasonably and adequately to disclose its policy, decisions and activities it is responsible for in a clear, accurate and full manner, including their known and possible impact on society, the economy and environment. The bank endeavors to make such information available to the stakeholders in order for them to be able to evaluate accurately the influence of the Bank's decisions and activities on their interests.

The transparency principle does not imply disclosure by the Bank of any restricted information, nor provision of any confidential information or information the provision of which would entail violation of legal and commercial obligations or safety and privacy obligations.

Principle of Ethical Conduct

By ethical conduct, the Bank understands such conduct of its employees that complies with the Bank's Mission, rules and values defined in the Bank's Development Strategy.

Principle of Respect for Stakeholders' Interests

The Bank is involved in constant dialogue with the stakeholders, regularly identifies, evaluates and factors in the expectations and interests of the stakeholders through meetings, interviews, surveys, focus groups, and analysis of the stakeholders' applications.

The Bank is open to discussing any issues of common interest with the stakeholders, creates conditions required to conduct such dialogue and aims to come to mutually acceptable solutions.

Principle of Complying with the Rule of Law and International Code of Conduct

The Bank observes the rule-of-law principle, realizes its supremacy over all by-laws, and makes the Bank’s internal regulatory documents subject to it, and adheres to the principle of equality before the law and agrees that all the laws equally apply to all without any exceptions, and that no person may avoid liability for his/her actions.

The Bank observes all applicable laws and regulations, takes measures to identify and study the laws and regulations that apply to it, informs its employees of their responsibility for compliance therewith and takes appropriate and timely measures to ensure compliance with the law in all jurisdictions where the Bank operates, even if such laws and regulations do not directly apply to the Bank.

Principle of Respect for Human Rights

The Bank observes human rights and acknowledges their importance and universality. The Bank respects the universal character of such rights and understands that they are indispensably applicable in any country of the Bank's presence, in any culture and in any circumstances, takes measures to ensure observance thereof, considers it inadmissible to benefit from situations where the law or compliance therewith does not provide for the adequate protection of human rights.

4. The Bank’s risks related to corporate social responsibility

4.1. The actions of the Bank reflect on the stakeholders' interests and might be subject to criticism on their part. Any criticism of the stakeholders is viewed by the Bank as a source of possible negative influence on the Bank’s reputation. The Bank considers reputation risk to be the main risk related to CSR.

4.2. Constant dialogue with the main stakeholders is considered by the Bank as the primary tool for managing reputation risk, which helps to identify a conflict of interest and prevent such risk in a timely fashion. For this purpose, the Bank regularly:

- Considers approaches made by the stakeholders
- Surveys the stakeholders
- Holds working meetings with representatives of the stakeholders
- Monitors mass media on matters pertaining to CSR
- Uses other forms and tools of communication.

4.3. The Bank evaluates and manages reputation risk in accordance with the Procedure for Evaluation of the Bank's Reputation Risks as adopted by the Bank.

4.4. Handling of the stakeholders' applications is based on the Policy for Handling of Applications of Customers, Shareholders and Employees of Sberbank of Russia OJSC, and on other internal regulatory documents of the Bank.

5. Definition and Classification of Stakeholders

5.1. The Bank's relations with the main stakeholders constitute the scope of application and management subject of CSR.

5.2. In defining and classifying the main stakeholders, the Bank is governed by its Mission, its Development Strategy, and expert judgments of possible immediate influence of a given person (group of persons) on the Bank’s activities or reputation.

5.3. To implement this Policy, the Bank distinguishes the following main stakeholders and their classes (Table 1):

Table 1. Definition and Classification of Main Stakeholders

Class	Type	Rationale
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1.	Customers	Corporate customers	Customers are consumers of the Bank's services. Its business substantially depends on their preferences. Practically every family in the Russian Federation uses the Bank's services. The Bank accumulates about half of all savings of the population and is the largest creditor of the Russian economy. Companies and organizations playing a significant role in the generation of the country's GDP have accounts with the Bank.
		Retail customers	
2.	Employees	Employees	The Bank is one of the largest employers in the Russian Federation with a staff of over 200,000 people. The employees are the main asset of the Bank. They work with customers and create the Bank's reputation, contribute to the development of its infrastructure, and ensure implementation of the Bank's strategic and business objectives.
3.	Society (local communities)	Society (local communities)	The Bank operates in every constituent entity and in most district centers of the Russian Federation and, consequently, is interacts actively with society (local communities). The Bank's activities are closely related to the social and ecological environment in which it operates.
4.	Shareholders and investors	Majority	There are over 100,000 persons registered in the register of the Bank's shareholders. The Bank is a public company with securities traded both on the Russian and foreign markets. The influence of shareholders is determined by applicable law, and the corporate management practice applied by the Bank. The Bank aims at increasing its market capitalization and is interested in transparent and open relations with its shareholders.
		Minority	
5.	Government	Federal authorities	The Bank is a major tax payer and participates in the implementation of important governmental projects and programs both on a federal and on regional levels. The government represented by its agencies and companies, with its share in the capital, is an important partner and customer of the Bank.
		Regional authorities	
		Municipal authorities	

5.4. To arrange management of relations with the stakeholders, the Bank focuses its CSR activities on the following priorities (Table 2):

Table 2. The Bank's CSR Priorities

A group of stakeholders	CSR Priorities
For customers	Ensuring the quality of products and services. Ensuring the availability of financial services. Responsible financing. Offering socially oriented products and services.
For employees	Human capital investments.
For society (local communities)	Supporting local communities. Charity and sponsorship. Enhancing the financial literacy of the population. Minimizing the negative impact on the environment.
For shareholders and investors	Responsible corporate conduct.
For the government	Contributing to the economic development of the country.

6. The Bank's Social Corporate Responsibility Priorities

Subject to the priorities of the Bank's CSR development, in its activities the Bank pays special attention to the following aspects:

In contributing to the economic development of the country

- Development of small business and private enterprise; the Bank's participation in major nationwide projects, in particular, using a private partnership mechanism. The Bank's efforts in this area will contribute to the creation of new workplaces, the development of the regions' economy, in particular, by increasing the tax proceeds of the Bank and its customers to the budgets of various levels.

In ensuring the quality of products and services

- Reduction of queues in the Bank's branches, accounting and handling of applications and complaints submitted to the Bank as one of the most important sources of information to improve its own activities and to enhance the Bank's competitiveness; ensuring the required level of reliability and security of the Bank's products and services for the consumers thereof.

In ensuring availability of financial services

- Quality development of the Bank's branch network, development of remote bank service channels, and ensuring the availability of financial services for people with disabilities. These efforts are aimed at enhancing the access to financial services for various population categories and the convenience with which customers receive the bank's services.

In development of responsible financing

- Ensuring the full awareness of customers of loan terms and, in case of corporate financing, conducting the necessary environmental and other expert reviews of the possible environmental impact of projects, financing of reequipment of production facilities with energy saving technologies. The Bank refuses to finance gambling businesses ¹ and pawnshops.

In enhancing the financial literacy of the population

- Implementation of special measures aimed at enhancing the financial literacy of the population, raising the awareness of the Bank's customers and consumers of various social and age groups about the Bank's products and services, development of their skills in using the Bank's products and services in everyday life, and explanation of the practical benefits of using them.

In offering socially oriented products and services

- Development of products and services contributing to resolution of social tasks, including development of housing finance, education loans, young family loans, special products and services for pensioners, creation and promotion of a universal electronic card, and ensuring state social transfers and tax payments. The Bank provides such products and services, maintaining a balance between its commercial interests and the interests of the above social groups.

In human capital investment

- The Bank's focus on enhancing its competitiveness by constantly improving the existing processes based on the Sberbank Production System (SPS), and using state-of-the-art breakthrough technologies and management solutions in the Bank's activities. The Bank views innovations as a tool for ensuring customer loyalty and enhancing the motivation of its employees. Human capital investments imply continuous training of personnel, holding of professional contests and competitions, development of the system of a personnel reserve and professional development. Human capital investments also include investment in employee health, development of sports programs, disease prevention programs, and programs of social, medical and pension insurance.

¹ As defined by Federal Act No. 244-FZ On *government regulation of the activities for the organization and holding of gambling games and making amendments to some legal acts of the Russian Federation* dated December 29, 2006.

In supporting local communities

- Practical participation of the Bank in the implementation of various initiatives contributing to the development of local communities and local territories where the Bank operates.

In charity and sponsorship

- Participation of the Bank in charitable and volunteer programs for support of child and social institutions (including orphan asylums and hospitals), support of social projects and initiatives, charitable organizations and foundations, etc.
- The Bank's support of, and active participation in, socially significant culture and art, science and education projects, major business events (forums, conferences, exhibitions), publishing business and special mass media projects, as well as support of national sport and the Olympic movement, active involvement in preparation of the XXII Winter Olympic Games of 2014 in Sochi in the status of General Partner.

In minimizing negative environmental impact

- Implementation of resource (energy, water consumption, etc.) saving and efficient nature management initiatives aimed at reducing the Bank's negative impact on the environment, implementation of projects for carbon financing and energy saving events funding.

In responsible corporate conduct

- Compliance by the Bank's employees and management with the code of ethics and rules determined by the Bank's Development Strategy, counteracting corruption and possible infringement of human rights, counteracting all forms of discrimination within the Bank, prevention of violations of the minority shareholders' rights; development of communication channels ensuring efficient interaction between the Bank and the stakeholders in accordance with the principles of accountability and transparency established by this Policy.

7. Organization of Corporate Social Responsibility Management

7.1. CSR management within the Bank is performed under the general management system of the Bank's activities and is an integral part thereof.

7.2. The main tool of the Bank's CSR planning and implementation is its business plan and project management system as it pertains to fulfillment of the priorities determined by this Policy.

7.3. The Strategy and Development Department is responsible for planning the Bank's CSR-related activities and controlling the efficiency thereof, planning and implementing measures aimed at identifying the interests of the stakeholders, coordinating the activities of the Bank's units for attaining the goals and objectives of this Policy in accordance with the expectations of the main stakeholders, developing proposals for implementation of the CSR priority areas, drawing up a list of the Bank's key CSR projects, developing management methodology and participating in the elaboration of the Bank's CSR standards, working out the main areas and methodological guidelines regarding training and retraining of the Bank's employees in CSR management approaches, participating in the implementation of CSR projects, and issuing CSR reports.

7.4. The functions of current planning of the Bank's activities for the CSR priority areas defined hereunder are vested with the Bank's operating units (both for business planning and project implementation). The operating units plan their activities subject to the provisions hereof. The Bank's operating units are responsible for initiating and implementing projects under the procedure established by the Bank, and for attaining targeted business plan values. Project managers and those coordinating and performing operational management of the activities of the Bank's respective operating units are personally responsible for the achievement of the target values and implementation of CSR projects.

7.5. The system of rewarding employees for achieving goals set for CSR is determined by the Bank's regulatory documents [15-17].

7.6. Resolutions on the Bank's participation in funding of charity and sponsor projects and programs shall be taken by the Bank's Management Board after they are reviewed by the Committee for Charitable and Sponsorship Activities of Sberbank of Russia OJSC or by the relevant Committees and collegial bodies of the regional banks in accordance with [13,14].

7.7. Appendix No. 4 hereto lists the main participants and their functions for the management of the Bank's CSR related activities.

7.8. While implementing this Policy, the Bank's operating units, foreign branches, subsidiaries and affiliates, and subsidiary banks shall determine not only the goals and objectives, but also management approaches in each of the Bank's CSR areas. Management approaches shall be formalized in the IRDs of the Bank (its foreign branches, subsidiaries and affiliates, and subsidiary banks), determining the principles of management of various CSR performance indicators.

7.9. In formalization of management approaches (development of internal regulatory documents describing approaches to managing the impact on the stakeholders / methodologies, approaches, limits, standards, etc.), the Bank's operating units, foreign branches, subsidiaries and affiliates, and subsidiary banks shall be governed by the need to comply with the following requirements:

When interacting with customers:

- Production of goods and services which are safe for customers and meet the mandatory requirements set forth by the laws and regulations
- Ensuring availability of their goods and services
- Ethical business conduct, no competition restrictions
- Enhancement of the financial literacy of consumers and their customers to the extent possible and in available forms
- Presence in various market segments and ensuring the required variety of products for various customer groups.

When interacting with employees:

- Support of freedom of association and the right to execution of collective agreements
- Prevention of child and forced labor
- Prevention of any labor or employment discrimination by race, nationality, religion, sex, membership in any organization, political beliefs or age upon employment, remuneration, providing training, promotion, dismissal or retirement
- Maintenance of employees health, social, medical and pension insurance of employees and veterans
- Providing safe labor conditions and taking measures aimed at reducing workplace hazard factors
- Stimulation of employees to further their training and professional development.

When interacting with governmental authorities and public organizations and associations:

- Observance of human rights and the rule-of-law principle
- Counteracting corruption, including abuse of office, blackmail and bribery

- Evaluation of environmental impacts of the Bank's decisions on providing loans to customers and its own activities
- Contribution to the development and distribution of environmentally friendly and safe technologies
- Introduction of a system of environmental management and economical consumption of electricity, heat, water, fuel, materials and other resources by implementing resource saving technologies.

When interacting with shareholders:

- Profitability of their activities, economical consumption of resources and reasonable dividend policy, and respect for the minority shareholders' rights.

8. Corporate Social Responsibility Reporting

8.1. The Bank shall annually disclose information on the results of its CSR activities by issuing a Bank CSR Report. The Bank's CSR Report shall be issued in accordance with the Sustainability Reporting Guidelines prepared by GRI (Global Reporting Initiative).

8.2. The procedure for drawing up the CSR Report is determined by the Bank's respective internal regulatory documents.

8.3. The Bank's Management Board, as advised by the Head responsible for the coordination and operational management of the CSR activities, may decide to audit or verify the Bank's CSR Report. In this case, the Bank's Management Board shall, along with the decision on the audit or verification, decide on the Report parameters. The decision on whether to call upon an auditor shall be taken as prescribed by the Bank.

8.4. In the event of issuing an unaudited and unverified CSR Report of the Bank, the Head responsible for the coordination and operational management of the CSR activities may make an unilateral decision on the Report parameters.

*Appendix No. 1 (List of Terms and Definitions)
to the Policy for CSR of Sberbank of Russia OJSC*

LIST OF TERMS AND DEFINITIONS

“Audit (Verification)” means a method making it possible to evaluate the Bank's Reports and implying that the results of such evaluation will be open to the general public, which will serve a guarantee of the Report authenticity for the recipients thereof.

“Interaction with the Stakeholders” means actions taken to enable a social dialogue between **the Bank** and one or more **stakeholders** to provide an informational basis for **the Bank's** decisions.

“Bank’s Impact” means a positive or negative change of society, the economy or **environment** resulting, fully or partially, from past and current decisions and activities of **the Bank**.

“Report Boundaries” mean the organizational units of the Bank group (Headquarters offices, regional banks, foreign branches, subsidiaries and affiliates, and subsidiary banks, etc.) the performance results of which are presented in the Report.

“Subsidiaries and Affiliates” means a group of non-bank subsidiaries and affiliates of the Banks determined in accordance with Policy for Management of Non-Credit Subsidiaries and Affiliates of Sberbank of Russia OJSC No. 2240 dated July 15, 2011.

“Subsidiary Banks” means foreign subsidiary credit organizations determined in accordance with Regulations on Interaction of Sberbank of Russia with Foreign Subsidiary Credit Organizations No. 1722 dated July 3, 2009.

“Stakeholders” means individual persons and legal entities or groups of persons having an influence on the Bank and its activities and/or being influenced by the Bank (customers, employees, shareholders, governmental authorities, public organizations, etc.).

“Corporate Social Responsibility Initiative” means a program or activity aimed directly at attaining a certain goal pertaining to **corporate social responsibility**.

“Bank’s Corporate Social Responsibility (Bank’s CSR)” refers to a number of principles and obligations the Bank is governed by while carrying out its activities as it pertains to:

- Management of relations with stakeholders
- Evaluation and management of impact on the national economy, social sphere and environment.

“International Code of Conduct” means expectations regarding **the Bank’s** socially responsible conduct based on traditional international law, generally accepted principles of international law or intergovernmental agreements which are generally or almost generally recognized.

“CSR Scope” means the CSR scope of application in the Bank's activities.

“Environment” refers to the natural environment in which **the Bank** operates, including air, water, earth, natural resources, flora, fauna, people and their interrelation.

“CSR Report” means the Bank's voluntary social reporting (Social Accountability), prepared in accordance with the GRI’s G3 Sustainability Reporting Guidelines.

“Report Parameters” means a complex of boundaries, coverage and application level of the CSR Report.

“Transparency” means openness with respect to decisions and activities influencing society, the economy and **environment**, and readiness to exchange information about them in a clear, accurate, timely, honest and full manner.

“Bank’s Management Board” refers to the President, Chairman of the Bank’s Management Board, and members of the Bank’s Management Board.

“GRI’s G3 Sustainability Reporting Guidelines” means the international CSR reporting standard developed by the network organization Global Reporting Initiative (www.globalreporting.org).

“ISO 26000 Standard ‘CSR Guidelines’” developed by the International Organization for Standardization, ISO).

“AA1000 Standards” means a set of tools and standards of non-financial reporting management and ensuring its quality which are developed by the AccountAbility Institute (Institute of Social and Ethical Accountability)

The series of AA1000 standards include:

- AA1000 Accountability Principles Standard (AA1000PS)
- AA1000 Assurance Standard (AA1000AS)
- AA1000 Stakeholder Engagement Standard (AA1000SES).

“Report Coverage” means a number of sustainability related subjects set out in the report. The subjects and indicators reflected in the report shall be sufficient to have a significant impact on the economy, environment and society.

“Report Applicability Level” means a volume of information disclosed by the Bank in the CSR Report, determined in accordance with the classification of the GRI’s G3 Sustainability Reporting Guidelines.

“Sustainability” means a development that meets the demands of the present generation without prejudicing the capabilities of next generations to satisfy their demands.

“Ethical Conduct” means conduct compliant with the principles of right and good conduct adopted by the Bank in the context of a specific situation, and in accordance with **the international code of conduct**.

Appendix No. 2 (List of Abbreviations)

to the Policy for CSR of Sberbank of Russia OJSC

LIST OF ABBREVIATIONS

“**Bank**” means Sberbank of Russia OJSC

“**IRD**” means Internal Regulatory Document

“**SDD**” means Strategy and Development Department

“**CSR**” means Corporate Social Responsibility

“**RF**” means the Russian Federation

“**RB**” means Regional Bank

“**ITD**” means International Transactions Department

“**BH**” means the Bank’s Headquarters

“**CMSA**” means the Center for Management of Subsidiaries and Affiliates

Appendix No. 3 (List of Documents Used)

to the Policy for CSR of Sberbank of Russia OJSC

List of Documents Used

1. GRI's G3 Sustainability Reporting Guidelines.
2. ISO 26000 Standard "CSR Guidelines".
3. AA1000 Assurance Standard (AA1000AS);
4. AA1000 Stakeholder Engagement Standard (AA1000SES).
5. GOST R ISO 14001-2007 of October 1, 2007.
6. United Nations Global Compact Principles.
7. Declaration on Environment and Development signed at the United Nations Conference on Environment and Development Rio Declaration on Environment and Development, 1992.
8. Corporate Social Responsibility International Standard. Requirements. CSR-2008 of Russian Organization for Quality.
9. Procedure for Evaluation of Reputation Risks of Sberbank of Russia No. 1485-r dated March 12, 2007.
10. Temporary Methodology for Legal Risk Assessment No. 1996 dated November 22, 2010.
11. Policy for Handling Applications of Customers, Shareholders and Employees of Sberbank of Russia OJSC No. 2081 dated February 16, 2011.
12. Regulations on the Labor Committee of Sberbank of Russia No. 2228-r dated August 26, 2011.
13. Regulation on Charitable Activities in Sberbank of Russia OJSC No. 2326 dated November 24, 2011.
14. Regulation on Sponsorship Activities in Sberbank of Russia OJSC No. 2029 dated December 14, 2010.
15. Temporary Regulation on Evaluation of Personal Performance of Employees of Sberbank of Russia OJSC under 5+ System No. 2182 dated June 30, 2011.
16. Regulations on Providing Incentives to Employees of Sberbank of Russia OJSC No. 1031-2-r dated December 22, 2010.
17. Regulations on Providing Incentives to Employees of the Headquarters of Sberbank of Russia OJSC No. 732-2-r dated December 17, 2010.

Appendix No. 4 (Distribution of CSR Functions)

to the Policy for CSR of Sberbank of Russia OJSC

Distribution of CSR Functions

Office	Main Functions
Management Board of Sberbank of Russia OJSC	<ul style="list-style-type: none"> • Approval of 1st level IRD for CSR • Making a decision on auditing or verifying the Report
Strategy and Development Department	<ul style="list-style-type: none"> • Drawing up of 1st–3rd level IRD for CSR, including with respect of drafting a CSR report • Planning and implementation of measures aimed at organizing a dialogue with the stakeholders, identification of interests of the main stakeholders, their satisfaction, determination of key subjects and interests to be reflected in the CSR Report • Planning of the Bank’s CSR activities and control of their efficiency, and coordination of the activities of the Bank's offices aimed at attaining the goals and objectives of this Policy in accordance with the expectations of the main stakeholders • Preparation of proposals for development of the Bank’s CSR activities, initiation of programs/projects, coordination of the results of the Bank’s CSR projects, and participation in the implementation of CSR projects • Monitoring of the management of the Bank’s CSR activities, drawing up of a list of key CSR projects, and preparation of proposals for identifying CSR priority areas • Requesting of information from the Bank’s operating units on their performance and attainment of planned and target CSR indicators • Drawing up of management methodology and participation in the development of CSR standards within the Bank, methodological and organizational support of the activities of operating units, projects and ensuring efficiency of CSR events • Working out the main areas and methodological recommendations for training and retraining of the Bank's employees for approaches to CSR and sustainability management • Organization of preparation and issuance of a report on the results of the Bank’s CSR related activities
Operating units	<ul style="list-style-type: none"> • Preparation of 2nd–3rd level IRD in CSR priority areas within the scope of their competence • Initiation and implementation of programs/projects in CSR priority areas in their business lines

	<ul style="list-style-type: none"> • Preparation of proposals for setting target non-financial indicators within the Bank, for Blocks, Headquarters, offices, regional banks, etc. • Attainment of target CSR indicators • Dialogue with the stakeholders, evaluation of their satisfaction, definition of key subjects and interests • Provision of SDD with information on CSR performance, projects and events • Collection of the required data under the process “Drawing up of the Bank’s Statistical Reporting”, preparation of reports and materials in their business lines to be included in the Bank’s CSR report
Regional banks	<ul style="list-style-type: none"> • Planning of CSR events (programs/projects, etc.) at the level of a regional bank and implementation thereof in their business lines • Participation in the implementation of general bank programs and projects in CSR priority areas • Drawing up of reports and materials to be included in the Bank’s CSR report • Dialogue with the stakeholders to identify key subjects and interests.

APPROVAL SHEET

Policy for Corporate Social Responsibility of Sberbank of Russia OJSC

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