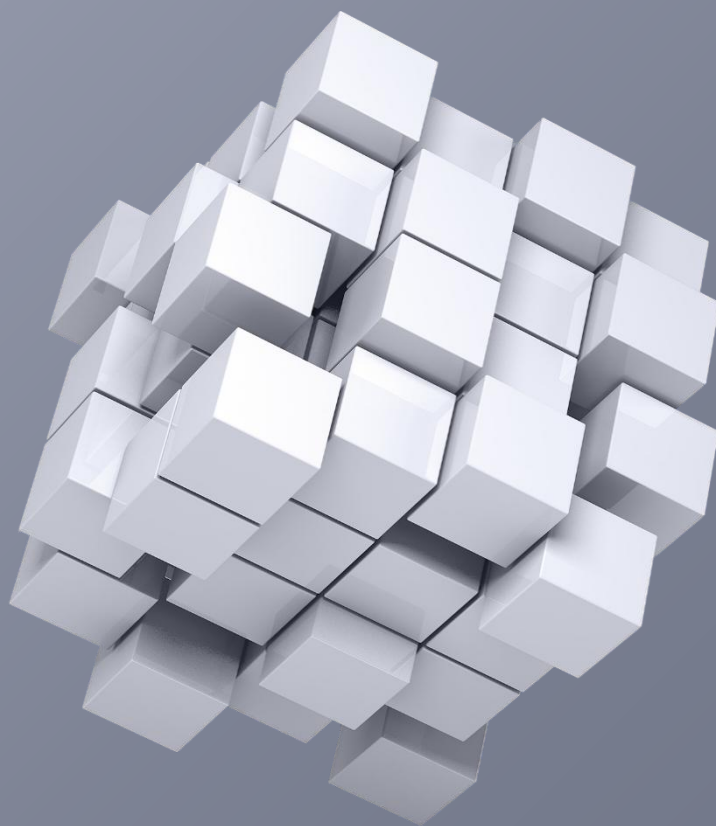




PUBLIC JOINT-STOCK COMPANY "SOFTLINE"

Softline Group Security Policy



Moscow, 2026

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1. Key Provisions

Ensuring the security of the Softline Group of Companies as it expands into new areas and regions places effective security risk management and protection from internal and external threats among the key factors for successful development.

In this regard, the Softline Group of Companies undertakes to take all possible measures to protect its assets, namely personnel, material resources, information, business reputation and business processes from the risk of harm, loss and damage that may arise as a result of illegal acts.

Responsibility for ensuring security lies with the management of the Softline Group of Companies and its business units.

The organization and direct implementation of the necessary security measures and their improvement are assigned to the Security Department of the Softline Group of Companies, whose main tasks are the continuous identification and assessment of internal and external security threats to the Softline Group of Companies and an adequate response to them in conjunction with the heads of business units.

The Security Department develops security procedures and standards in accordance with corporate requirements (appendix to this Policy) and monitors their implementation by business unit managers and employees of the Softline Group of Companies. The Vice President of Security's orders on matters within his or her purview are binding on business unit managers and employees of the Softline Group of Companies.

All employees of the Softline Group of Companies must strictly comply with the Corporate Security Requirements and promptly report to their functional manager any violations of Russian legislation, corporate policies, standards and procedures, unethical behavior, or conflicts of interest that become known to them.

The Softline Group of Companies ensures security based on the principles of legality, respect for and observance of human and civil rights and freedoms, cooperation and mutual understanding, and personal responsibility. In all its interactions with organizations and individuals, the Softline Group of Companies welcomes their commitment to the principles contained in this Policy.

2. Corporate security requirements

The Softline Group of Companies' corporate security requirements apply to all regions of operation and all business units of the Softline Group of Companies.

Business unit managers are responsible for ensuring the security of the Company's assets. Together with the Security Department, they conduct risk assessments and develop and implement measures and methodologies to ensure effective security risk management. All

measures taken must comply with the Softline Group Security Policy and corporate ethics standards.

The Softline Group of Companies maintains an open dialogue and consultations with all interested organizations and individuals to identify and resolve issues that may arise as a result of its activities, as well as to ensure effective risk management in the area of security.

The Vice President of Security provides expert assessments on strategic security issues to the Softline Group's senior management, coordinates the development of security standards and procedures, and oversees their implementation by business unit managers and employees of the Softline Group.

Security risk assessments are conducted on a regular basis at least once a year in all business units of the Softline Group of Companies.

Security measures are based on a comprehensive risk assessment and must be proportionate to those risks and cost-effective. Security requirements apply to all corporate assets, including personnel, inventory, information resources, and business processes, and are taken into account during the planning and implementation of all Softline Group projects.

Business unit managers, in conjunction with the Security Department, develop and implement an effective security management system, distributing resources and responsibilities, to ensure that all employees and partners of the Softline Group of Companies understand the need to comply with these Security Requirements.

All candidates for vacant positions within the Softline Group of Companies and its business units are subject to mandatory screening in accordance with established procedures.

When concluding any contract or agreement, the Security Department conducts a thorough check of potential counterparties in accordance with established procedures and makes its conclusion on the advisability of entering into contractual relations with them.

All security incidents are recorded and subject to internal investigation. If necessary, appropriate legal (disciplinary) measures are taken against violators.

The Vice President of Security must be informed by the heads of business units about all security incidents that could significantly complicate the activities of the Softline Group of Companies or cause significant harm to its business reputation.

The Security Department is responsible for conducting all internal investigations into instances of illegal attacks on the assets of the Softline Group of Companies, violations of corporate policies, standards and procedures.

Where appropriate, the Security Department, in coordination with business managers, organizes interaction with law enforcement and other government agencies, local government bodies, third-party organizations and their security services to ensure the security of the assets of the Softline Group of Companies.

Vladimir Lavrov,
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