

**For the attention of the General Meeting of Shareholders  
of Sistema PJSFC**

**INTERNAL AUDITOR'S OPINION  
OF SISTEMA  
PUBLIC JOINT STOCK FINANCIAL CORPORATION  
FOR 2019**

Date and location: 14 May 2020, Moscow

This Opinion has been prepared pursuant to clause 3 of Article 52 of Federal Law No 208-FZ "On Joint-Stock Companies" (as amended on 4 November 2019) and is included in the materials provided to shareholders in connection with the Annual General Meeting of shareholders of Sistema PJSFC (hereinafter also "the Company").

The Company's structural unit performing the functions of internal audit is called the "Internal Control and Audit Department" (hereinafter also "the Department"). In accordance with Section 5 of the Company's Policy on Internal Audit (Minutes No 10-14 dated 17 December 2014), the Head of the Department shall be appointed and dismissed by a resolution of the Board of Directors of the Company and reports to the Board of Directors of the Company.

In accordance with the Policy on Internal Audit approved by the resolution of the Board of Directors of Sistema PJSFC, the Department provides independent guarantees and advice in order to assist the Company's governance bodies in increasing the effectiveness of the risk management, internal control and corporate governance system.

The Department's activities are guided by the International Standards for the Professional Practice of Internal Auditing adopted by the Institute of Internal Auditors.

The Internal Control and Audit Department conducted an independent assessment of the effectiveness of the risk management, internal control and corporate governance systems of the Company for 2019.

The Department's opinion was prepared by studying the internal regulatory documents of the Company, financial and management reporting, results of monitoring risk management processes and implementation of control procedures, and information on financial and economic activities obtained during the audits.

Based on the results of the audits, the Department has good reason to believe that the Company's system of internal control, risk management and corporate governance complies with the approaches and principles established by the Board of Directors and management of

Sistema PJSFC, and provides an understanding of the Company's current status and development prospects in all material aspects.

Based on the data obtained and analysed by the Department, the audit found that the risk management, internal control and corporate governance procedures are integrated into the strategic and operational activities of the Company and are carried out without significant deficiencies that could critically affect the effectiveness of the Company and the reliability of the data; further, there is continuous monitoring and improvement of mechanisms and procedures for risk management, internal control and corporate governance.

According to the Department, the general state of risk management, internal control and corporate governance systems at Sistema PJSFC is assessed as effective.

**Vice President for Internal Control and  
Audit at Sistema PJSFC**

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A. Porokh