

APPROVED

by Resolution of the Board of Directors
of JSC INK-Capital
Minutes No. 114 dated October 25, 2021
Chairman of the Board of Directors

**ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-
LEGALIZATION OF PROCEEDS RECEIVED FROM
CRIME (ANTI-MONEY LAUNDERING) POLICY
OF JSC INK-CAPITAL**

Revision 4

Irkutsk

2021

CONTENTS

I.	GENERAL PROVISIONS	3
II.	TERMS AND DEFINITIONS.....	3
III.	COVERAGE.....	9
IV.	GOAL AND OBJECTIVES OF THE POLICY	9
V.	KEY ANTI-FRAUD, ANTI-CORRUPTION, AND ANTI-LEGALIZATION OF PROCEEDS RECEIVED FROM CRIME (ANTI-MONEY LAUNDERING) PRINCIPLES. SYSTEM IMPROVEMENT	10
VI.	PREVENTIVE ANTI-FRAUD, ANTI-CORRUPTION, AND ANTI-LEGALIZATION OF PROCEEDS RECEIVED FROM CRIME (ANTI-MONEY LAUNDERING) MEASURES.....	12
VII.	KEY ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-LEGALIZATION OF PROCEEDS RECEIVED FROM CRIME (ANTI-MONEY LAUNDERING) MEASURES	16
VIII.	PROCEDURE FOR IMPLEMENTATION OF BUSINESS-PROCESSES WHICH ARE AT RISK OF FRAUD, CORRUPTION AND LEGALIZATION (MONEY LAUNDERING).....	20
IX.	LEGAL AND METHODOLOGICAL BASIS OF THE POLICY	26
X.	FINAL PROVISIONS	28

I. GENERAL PROVISIONS

- 1.1 This Anti-Fraud, Anti-Corruption and Anti-Legalization of Proceeds received from Crime (Anti-Money Laundering) Policy (hereinafter referred to as the Policy) is a Local regulatory document of the Company and the Group (as defined below), which sets out for the Company and the Group a range of interrelated principles, procedures and specific activities against corruption, legalization (money laundering) of proceeds received from crime, and compliance with Anti-corruption laws and standards.
- 1.2 Requirements of this Policy meet the principles of open and honest business practices of the Group, its desire to improve corporate culture, follow international practices of corporate governance and high ethical standards. Requirements of the Policy are binding upon all Relevant persons and Management (as defined below).
- 1.3 The Policy was developed in accordance with the requirements of the Anti-corruption laws and standards on anti-fraud, anti-corruption, anti-legalization (anti-money laundering) of proceeds received from crime and taking into consideration the Code of Ethics of the Company (hereinafter referred to as the Code of Ethics), and the Company's Policy on Sanctions Compliance (hereinafter referred to as the Sanctions Policy).

In the process of creating this Policy we took into account experience of the best anti-corruption practices applied both in Russia and internationally. The Policy is not intended to replace the norms and requirements established by the Anti-corruption laws and standards. If the Anti-corruption laws and standards establish more stringent requirements, each of the persons specified in Clause 1.2 of the Policy shall comply with such requirements. In case any provisions of the Policy contradict the Anti-corruption laws and standards, the more stringent regulations shall prevail.

II. TERMS AND DEFINITIONS

- 2.1 For the purposes of this Policy the following terms and abbreviations are used:

Term	Definition
Anti-corruption reservation (Anti-corruption reservation for compliance with anti-fraud and anti-corruption laws)	An appendix to a contract including employment agreement, contract, which is concluded by any company from the Group, or section of such document, governing the agreement between the parties regarding anti-corruption actions in the course of performance of their mutual obligations and the consequences which follow in case such agreement is broken.
Anti-corruption laws and standards	Applicable laws and standards of the Russian Federation on anti-fraud, anti-corruption, anti-legalization (anti-money laundering) of proceeds received from crime, as well as relevant foreign and international laws and standards, including the regulatory documents referred to in Chapter 9 of the Policy (in each case, as amended).
Anti-corruption monitoring	Monitoring of activities which are undertaken by the Group to prevent and combat corruption in order to ensure the assessment of efficiency of such activities, provide assessment and forecast

Term	Definition
	of corruption factors and signals; review and assess the data obtained in the course of monitoring; develop forecasts of the future situation and development trends of related activities.
Beneficiary owner	A physical person, who ultimately, directly or indirectly (through a Third Party, including a legal entity, several legal entities, or a group of associated legal entities) owns (has a predominant participation interest of more than 25 percent in the charter capital) the client, which is a legal entity, or directly or indirectly controls activities of the client, including the ability to determine the decisions made by the client, or is otherwise considered as the beneficiary owner in accordance with the Anti-corruption laws and standards. The beneficiary owner of the client which is a physical person is considered the above-mentioned person, except the cases where there is a reason to believe that the beneficiary owner is another physical person.
Charity	Voluntary activity of the Group aimed at free of charge (gratuitous or on preferential terms) transfer of property, including money, provision of services and other support to physical persons and legal entities.
Close relatives	Any of the following: husband, wife, parents, children, adoptive parents, adopted children, siblings, grandfather, grandmother, grandchildren, and other persons who are considered as “close relatives” in accordance with the Anti-corruption laws and standards.
HR Block	A structural division of Limited Liability Company Irkutsk Oil Company, responsible for recruitment of personnel and personnel record, record management, organizational and staff activities, establishment of salary system, budgeting payroll, organizing and holding trainings of Employees and other Relevant persons.
bribery	A type of corrupt activities including proposal, promise, bribe, request, consent, bribe taking, mediation in bribery or bribe provocation in accordance with the Anti-corruption laws and standards.
Hotline	A system which collects and processes information regarding indications and facts of bribery and corruption, violation of Anti-corruption laws and standards, regulatory documents, and the Code of Ethics, as well as presumed cases of intentional acts or omissions which negatively affect assets of the Group and their effective utilization, reputation of the Group or otherwise infringe interests of the Group or applicable laws. The purpose of the Hotline is to create an opportunity for any person to report (anonymously or openly) about violations which already happened or yet to happen with regard to the activity of the Group.
Group	The Company and companies that constitute one group in accordance with the applicable laws of the Russian Federation or that are controlled by the Company in accordance with International Financial Reporting Standards, including (without

Term	Definition
	limitation) Limited Liability Company Irkutsk Oil Company.
Sanctions Compliance Group	Employees of the Group responsible for the implementation of the Sanctions Policy.
IAD (Internal Audit Department)	A structural division of Limited Liability Company Irkutsk Oil Company, which is responsible for audit procedures.
Due diligence	A principle based on rationality and integrity. In accordance with this principle at execution of business operations or making management decisions one should take into account the data sufficient for creating a reasonably justified opinion on whether a counterparty or applicant for the employment have lack of integrity signs. The term “due diligence” shall in each case be interpreted in accordance with the applicable laws.
Officials	Persons who, on a permanent or temporary basis, or based on special authorization, represent legislative, executive and judicial powers of any state, as well as persons exercising administrative functions including organizational-administrative or administrative-economic functions in governmental bodies and local governments of any state, governmental and municipal organizations, Armed Forces or other military organization in Russia, governmental and municipal entities, profit and non-profit (including international and foreign) organizations, or governmental and other authorities of foreign countries, state or municipal institutions, as well as international organizations, as well as other persons identified as "officials" in the Anti-corruption laws and standards.
Position in the Russian governmental body	A position in the governmental or municipal body included into the List of Positions of the Federal State Service. To be appointed to this position a person or federal public servant should disclose information about his/her income, property and property obligations as approved by the Russian Federation President’s Decree No. 557 dated May 18, 2009 (as amended) or regulatory legal acts replacing such Decree.
Code of Ethics	The Code of Ethics of the Company approved by the Board of Directors.
Audit Committee	The Audit Committee under the Board of Directors.
Company	Joint Stock Company INK-Capital (JSC INK-Capital).
Counterparties	Any Russian or international legal entities or physical persons who interact with the Group based on contracts or other legally binding agreements, including within the frameworks of pre-contractual relations.

Term	Definition
Conflict of Interests	Any situation or circumstances where personal interest (direct or indirect) of a Relevant person influences or may influence proper execution of his/her duties, or other functions, there is or there could be a contradiction between personal interest of an employee and rights and legitimate interests of the Group which can result in infringement of rights, legitimate interests, property and/or business reputation of the Group, and the term “conflict of interests” shall in each case be interpreted in accordance with the applicable laws. Personal interest means interest of a Relevant person acting on behalf of or in the interests of the Group and which is connected with an opportunity for a Relevant person to get money, valuables or other property or property services, other property rights for himself/herself or Third parties in the course of performing his/her job or other functions. When it comes to the Management, the Conflict of Interests includes the cases specified in the Regulations on Settlement of Conflicts.
corrupt practice	External manifestations of corruption through actions.
Risk of corruption	Circumstances and conditions which create a potential opportunity for corrupt actions.
corruption, corrupt actions	<p>1. Promise, proposal or provision of financial or any other kind of benefit (property, including money and securities; property services; property rights; exemption from property obligations) to Officials in order to encourage them to take actions or as a reward for such actions (omissions) which do not comply with the principle of legality, criteria of honesty and impartiality, including for the purpose of defining the conditions of conclusion, execution or termination of transactions, performing or continuing business operations, receiving or retaining the property in business operations, getting advantages or achieving other goals.</p> <p>2. Request, demand, consent to accept and acceptance of financial and any other kind of benefit from any Officials, if a person knows or assumes that in return he/she or its associated persons will need to undertake actions (omissions) on behalf of such Officials where such actions (omissions) do not comply with the principle of legality, criteria of honesty and impartiality.</p> <p>3. All other actions (omissions) deemed by the Anti-corruption laws and standards as malpractice, misuse of power, bribery or bribe taking, bribery mediation, commercial bribery, bribe or commercial bribe provocation, illegal remuneration on behalf of a legal entity or any actions otherwise violating the Anti-corruption laws and standards.</p> <p>4. Other actions related to provision/promise to provide or acceptance/request of financial or other benefits which could be deemed as not meeting the corporate ethics, be unacceptable</p>

Term	Definition
	and/or illegal. 5. Other actions (omissions) that are considered as “corruption” in accordance with the Anti-corruption laws and standards.
legalization (money laundering) of proceeds received from crime	Giving a lawful type of possession, use or disposal of funds or other property obtained as a result of a crime, as well as other actions (omissions) that are considered as “legalization (money laundering) of proceeds received from crime” in accordance with the Anti-corruption laws and standards.
Local regulatory document	An internal regulatory document which is issued in form of a long-lasting clearly understandable set of standards (rules) governing certain aspects of business activities of the Group and binding upon the employees who are covered by this document.
fraud, fraud actions	Actions of Relevant persons, Associated persons, Third parties, or any other persons which are: 1) undertaken by means of deception (provision of false information, non-disclosure of true facts, fraudulent misrepresentation or misrepresentation by negligence, willful actions to mislead a person) or abuse a position of trust (using the relationship of trust based on the position or personal/friend/family relations; undertaking obligations without the intention to fulfill thereof); 2) aimed at theft of property or acquisition of right for a third party (property including money and securities, other property including property rights; results of work and services; protected results of intellectual activity and means of individualization equal to intellectual activity) or gaining financial or other advantage, as well as assignment to a position or avoiding obligation; and 3) other actions (omissions) that are considered as “fraud” in accordance with the Anti-corruption laws and standards.
Gift	Inventory or other benefit gained on a free-of-charge base or on a non-equivalent base and recognized as a gift according to the Anti-corruption laws and standards or customary business practice.
Gift fund	A set of inventories purchased by the Group as Protocol gifts to Third parties.
Policy	This Anti-Fraud, Anti-Corruption and Anti-Legalization of Proceeds Received from Crime (Anti-Money Laundering) Policy of the Company.
Regulations on Settlement of Conflicts	The Regulations on Settlement of Corporate Conflicts and Conflicts of Interest approved by the Board of Directors.
Representation expenses	Expenses of the Group incurred in order to finance public functions, business negotiations, providing services to representatives of other organizations for the purpose of establishing and supporting cooperation and business contacts of the Group, including expenses within the frameworks of existing contracts and in cases set forth by the applicable laws.

Term	Definition
Protocol gift	Inventory recorded in the Gift fund of the Group and intended to be a gift on behalf of the Group in accordance with the Policy and other Local regulatory documents of the Group.
procedures for selecting Counterparties	The procedures for selecting Counterparties of the Group in accordance with the applicable laws and Local regulatory documents.
Risk of fraud	Conditions and circumstances which create a potential opportunity for fraud actions.
Management	Shareholders (members), Board members, Sole and collective executive bodies and other management bodies of legal entities constituting the Group.
Sanctions Policy	The Company's Policy on Sanctions Compliance approved by the Board of Directors.
Associated persons	Physical persons and/or legal entities acting jointly with a company of the Group, and/or under control of the Group, and/or representing the Group (except for Relevant persons) including physical persons who render services to the Group or work based on a civil contract, as well as other persons who are considered as “associated persons” in accordance with the Anti-corruption laws and standards.
Board of Directors	The Board of Directors of the Company.
Relevant person	Employee, Management or other person that acts on behalf of and in the interests of the Group.
Employee	A physical person who has labor relations with legal entities of the Group and works based on a fixed-term employment agreement or permanent contract.
Sponsorship	Provision of voluntary assistance by the Group to physical persons or legal entities including provision of money, services and other support which include justification of sponsorship goals and results of investment and drafting the report on expenses.
Third parties	Officials, Counterparties, and other persons exercising administrative functions including organizational-administrative or administrative-economic functions in various organizations.
IACD (Internal Administrative Control Department)	A structural division of Limited Liability Company Irkutsk Oil Company, which is responsible for implementation of the Policy including, among other things, current monitoring and complex assessment of internal rules and procedures of the Group in respect of their compliance with the tasks of combating fraud and corruption, as well as initiating amendments or introduction of new Local regulatory documents and administrative documents.
Risk and Business Continuity Management Center	A structural division of Limited Liability Company Irkutsk Oil Company responsible for development of risk management (including risk of corruption) methodology.

III. COVERAGE

- 3.1 The Policy sets out the minimum standards of conduct which shall be observed by Relevant persons of the Group regardless of their positions or functions in the course of their interaction with Officials and any Third parties.

The Policy is applied in conjunction with the Sanctions Policy, the Code of Ethics, and other Local regulatory documents. When applying the Policy, it is also necessary to take into account and comply with the provisions specified in the Sanctions Policy, the Code of Ethics, and other Local regulatory documents.

- 3.2 The Policy covers all companies of the Group, Counterparties of the Group, and other persons involved due to mutual obligations between them and the Group including anti-corruption obligations and other anti-corruption agreements.
- 3.3 Relevant persons and other persons are personally liable for compliance with the Policy and (for Employees and Management) for actions (omissions) of their subordinates violating the provisions of the Policy.
- 3.4 In case Local regulatory documents contradict the Policy, the Policy shall prevail.

IV. GOAL AND OBJECTIVES OF THE POLICY

4.1 Goal of the Policy

The goals of the Policy are as follows:

- to combat corrupt activity the Group might be involved into;
- to detect, prevent and mitigate risks of illegal, unethical, and corrupt behavior, and frauds;
- to create a uniform understanding among all Relevant persons, as well as other stakeholders, including Third Parties and Officials, about the essence of corrupt and fraudulent actions in any form and expression; and
- to increase the Group's transparency.

4.2 Objectives of the Policy

The objectives of the Policy are as follows:

- to ensure compliance of activity of the Group with the Anti-corruption laws and standards;
- to create the culture of ethical conduct and negative attitude of Relevant persons towards all manifestations of corruption and fraud;
- to create motivation for good and ethical conduct and zero tolerance of fraud and corruption;
- to summarize and explain the key requirements of Anti-corruption laws and standards;
- to perform anti-corruption compliance-control; and
- to manage Risk of corruption, Risk of fraud, and Risk of legalization (money laundering) of proceeds received from crime.

4.3 Anti-corruption measures

Anti-corruption measures include, but are not limited to the following functions:

- to determine what structural divisions are responsible for prevention of corruption and other violations of law;
- to cooperate with law-enforcement agencies to combat corruption, legalization (money laundering) of proceeds received from crime;
- to prevent and settle Conflicts of interests;
- to prevent drafting unofficial statements and using falsified documents.

V. KEY ANTI-FRAUD, ANTI-CORRUPTION, AND ANTI-LEGALIZATION OF PROCEEDS RECEIVED FROM CRIME (ANTI-MONEY LAUNDERING) PRINCIPLES. SYSTEM IMPROVEMENT

5.1 The Policy is based on the following principles:

- zero tolerance of fraud and corruption, legalization (money laundering) of proceeds received from crime;
- legality;
- inevitability of punishment;
- proportionality of applied procedures and current Risks of corruption and fraud;
- direct participation of the Management in implementation of anti-fraud, anti-corruption, and anti-legalization of proceeds received from crime (anti-money laundering) activities; and
- Due diligence.

5.2 Zero tolerance of fraud, corruption, legalization (money laundering) of proceeds received from crime

Zero tolerance of fraud, corruption, and legalization (money laundering) of proceeds received from crime is a key element of the corporate culture and corporate ethics and means absolutely zero tolerance of fraud, corruption and legalization (money laundering) of proceeds received from crime in the course of interaction of Relevant persons within the Group, interaction with Counterparties, Officials, and other Third parties.

The Group declares about its zero tolerance of corruption and legalization (money laundering) of proceeds received from crime of any kind and prohibits Relevant persons directly or indirectly (in person or through any agents) from participation in corrupt actions including proposal of a bribe, promise of a bribe, bribing, asking for a bribe and bribe taking (commercial bribery) or payment for facilitation of administrative, bureaucratic and other procedures in any way including by means of money, valuables, services or other material or non-material benefit for any persons or from any persons or organizations including, among others, commercial and non-profit organizations, government authorities and local government bodies, public officers including foreign public officers, for the purpose of gaining personal benefit or benefit of the Group, or Third parties.

5.3 Legality

The Group works in strict compliance with the Anti-corruption laws and standards.

5.4 Inevitability of punishment

The Group holds responsible those who have committed violation ignoring his/her position, period of work, status and other relations in accordance with the Anti-corruption laws and standards.

5.5 Proportionality of applied procedures and current Risks of corruption and fraud

The Group develops and implements necessary and sufficient anti-fraud, anti-corruption, anti-legalization of proceeds received from crime (anti-money laundering) procedures which reasonably meet the level of identified risks and monitors their observance. The applied procedures are a set of preventive measures aimed at prevention and mitigation of the fraud, corruption and legalization of proceeds received from crime (money laundering) risks.

All applied procedures should be clear, efficient and implementable. Specific anti-fraud, anti-corruption and anti-legalization of proceeds received from crime (anti-money laundering) procedures shall be proportional to the existing risks.

5.6 Personal example of the Management

The Management creates a single ethical standard of zero tolerance of any kind of fraud, corruption and legalization (money laundering) of proceeds received from crime at any level which serves as a reference of good conduct for all other Relevant persons and forms anti-fraud, anti-corruption and legalization of proceeds received from crime (anti-money laundering) business practice.

Involvement of the Management into implementation of this Policy is a guarantee of its efficient application.

5.7 Due diligence

In order to mitigate risks of being involved into illegal activities , the Group conducts a comprehensive analysis of the submitted financial and tax reporting documents of the Counterparty, and counterchecks them through existing open information resources; checks business reputation, availability of necessary technical and human resources; investigates whether the Counterparty is included in the list of potentially dangerous entities, whose activity is associated with the legalization (money laundering) of proceeds received from crime and determines the presence or absence of the Conflict of interests.

The Group welcomes its Counterparties commitment to the principles of the Policy, their willingness to include an Anti-corruption reservation into contracts and their cooperation in the course of investigation of cases when mutual agreements in this area are violated.

The elements of complex review are used in the course of hiring new Employees and general HR work. The Group examines candidates applying for a job from the point of their reliability, zero tolerance of corruption and absence of Conflict of interests before making a decision on entering or extending employment (civil law) agreements.

VI. PREVENTIVE ANTI-FRAUD, ANTI-CORRUPTION, AND ANTI-LEGALIZATION OF PROCEEDS RECEIVED FROM CRIME (ANTI-MONEY LAUNDERING) MEASURES

6.1 With the purpose to accomplish the tasks set in Clause 4.2 of this Policy, and pursuant to main principles of fraud, corruption, and legalization of proceeds received from crime (money laundering) prevention, the Group implements a set of preventive measures, including:

- determination of the divisions and Employees responsible for prevention of corrupt actions and countermeasures to fraud, corruption, and legalization (money laundering) of proceeds received from crime;
- building the internal control system;
- regimenting personal responsibility of Relevant persons for adherence to the Policy, informing and training of Relevant persons; and
- assessment of the risk of interaction with Third parties and other persons; conducting KYC checks of Third parties and other persons with whom the Group interacts, in terms of applicable law and reputational risks.

6.2 Internal control

In order to comply with the requirements of this Policy, management of the Group builds up an internal control system, including monitoring activities of the Group, Relevant persons for compliance with Anti-corruption laws and standards, preparing reports on compliance with the Policy and Anti-corruption laws and standards, and ensuring an opportunity to inform the Group and law enforcement agencies on instances of fraud, corruption, and legalization (laundering) of proceeds from crime.

6.3 Practical implementation of procedures to ensure fair work on behalf of Relevant persons

6.3.1. The Company provides for implementation of anti-corruption code of conduct for Relevant persons as part of corporate culture of the Group, and, in this connection, applies the Code of Ethics, which determines the following:

- basic and fundamental values, ethic norms and rules of conduct, shared values and principles of the Group; and
- specific rules and standards of conduct for Relevant persons, which guide general ethics of business relations and seek to create an ethical and fair condu.

6.3.2. The Group abides by principles of integrity and objectivity in organizational structure manning (including managerial positions). In this connection, the following is taken into account, among others:

- Employees are appointed or promoted into superior positions only based on their business qualities; and
- it is prohibited to employ Close relatives into positions which are directly subordinated.

6.3.3. Within the implementation framework of this Policy, Relevant persons shall:

- by request of IADC, provide information specified in Clause 6.7 of the Policy;
- refrain from committing and/or participation in committing of corrupt actions or other violations in their own interests or on behalf of the Group;
- refrain from conduct, which may be interpreted by external observers as readiness to commit and/or participate in committing of corrupt actions or other violations in their own interests or on behalf of the Group;
- immediately inform IADC about any instances of proposing Relevant persons to commit corrupt actions or other violations;
- immediately notify IADC about any information, which may become known to a Relevant person, regarding committed corrupt actions or other violations on behalf of other Relevant persons, Counterparties, Third parties, or other persons; and
- inform IADC about potential or actual Relevant person’s Conflict of interests.

6.4 **Conflict of Interests**

In the process of performing their job, civil law, or other functions, Relevant persons shall avoid any Conflict of Interest.

In a situation of Conflict of Interests, Relevant persons shall abide by requirements of this Policy, Regulations on Settlement of Conflicts and other Local regulatory documents. Employees shall inform IADC and (for Employees) their immediate supervisors and about all Conflicts of Interests.

In order to prevent possible Conflict of Interests, Relevant persons shall provide complete and trustworthy information about all prior and current employments and positions held, including Positions in the Russian governmental bodies, as well as all legal entities, where the Relevant person and/or his/her Close relatives are members/shareholders or Beneficiary owners by submitting an application on the presence/ absence of Conflict of Interests:

- prior to entering into employment or civil law relations with the Group;
- upon transferring to another position within the Group; and
- immediately upon appearance of any signs that may be considered as Conflict of Interest.

HR Block shall request applicants for respective job positions to provide information about all prior and current employments and positions held, including Positions in the Russian governmental bodies.

6.5 **Assessment of risks**

Assessment of risks is made by the Risk and Business Continuity Management Center together with IACD and IAD in order to define specific business processes of the Group which realization has the highest risk of corrupt violations by Relevant persons for the purpose of gaining personal benefit or for the benefit of the Group.

In the overall assessment of the legalization of proceeds received from crime (money laundering) risk, there is a ban on transactions with entities that are

included by regulatory and governmental authorities, as well as by other reliable sources, in the list as potentially dangerous entities, which activities are associated with the legalization (money laundering) of proceeds received from crime.

Assessment of risks is made on a regular basis.

The procedure of revealing and assessing specified risks is set forth by a separate Local regulatory document.

6.6 **Training and Informing**

The Group shall take all measures to inform all Relevant persons about the contents of the Policy and ensure compliance with the latter.

Relevant persons training shall be implemented in accordance with schedule adopted by the Group.

Training program shall incorporate informing Employees about applicable Anti-corruption laws and standards, corporate culture and corporate ethics, zero tolerance principles in relation to fraud, corruption and legalization (money laundering) of proceeds received from crime, as well as typical examples of corruption situations and actions pattern to be followed if someone is involved in any such corresponding situations.

Training program can be delivered either through personal presence or remote course. Personal presence at training may be arranged with use of electronic devices (video- or web-conference).

6.7 **Determination of the divisions and officials responsible for prevention of corrupt actions and countermeasures to fraud, corruption, and legalization (money laundering) of proceeds received from crime**

IACD has enough powers to conduct anti-corruption activities, including activity in relation to employees in managerial positions at the Group, it is also provided with adequate staff and technical resources.

IACD functions within implementation of this Policy:

- to conduct activity toward implementation of principles and requirements of this Policy;
- to develop the program of anti-corruption and anti-legalization of proceeds received from crime (anti-money laundering) measures;
- to implement Anti-corruption monitoring of the activity of the Group;
- to conduct control activities targeted to identify any corruption or other violations;
- to audit information about income and expense, property and other assets, material liabilities in relation to applicants for positions within the Group, Employees or their Close relatives, to perform other actions with the purpose to identify any Conflict of interests or facts of affiliation;
- to initiate conducting a Risk of corruption assessment;
- to review reported proposals to Relevant persons to perform corrupt actions or other violations in the interest of or on behalf of a third-party

- organization, as well as possible corrupt actions or other violations committed by Relevant persons, Counterparties of the Group, Third parties, or other persons;
- to provide individual consulting to Relevant persons in relation to corruption prevention;
 - to cooperate with authorized representatives of supervisory and law enforcement agencies or other authorized persons in the course of audits of activity of the Group for prevention of and combating corruption;
 - to cooperate with authorized representatives of law enforcement agencies in taking actions to suppress or investigate corruption crimes, including search and investigation activities;
 - to evaluate the results of anti-corruption activity and draft relevant reports for Management, Audit Committee and Board of Directors;
 - to coordinate the activity of structural divisions in relation to implementation of the Policy;
 - to participate in conducting summits, practical research workshops, conferences at national and international level in the domain of corruption prevention and fighting;
 - to conduct scheduled and unscheduled audits of adherence to principles of this Policy and compile reports on findings of such audits;
 - to develop documents in relation to corruption, fraud, and legalization of proceeds received from crime (money laundering) prevention and countermeasures, and initiate update of documents due to any changes in the laws of the Russian Federation;
 - to procure that the Relevant persons responsible for the anti-money laundering procedures approach the Sanctions Compliance Group in order to perform sanctions screening of each new Counterparty of the Group as of the date of:
 - (a) accreditation as Counterparty of the Group;
 - (b) entry into a contract with any company of the Group; and
 - (c) amendment of the contract;
 - to procure that the Relevant persons responsible for the anti-money laundering procedures provide “know your customer” (KYC) information required for the sanctions compliance screening of the Group’s counterparties to the Sanctions Compliance Group, as well as follow Sanctions Compliance Group’s guidance in relation to Sanctions compliance.

6.8 Personal and Corporate Responsibility

It is an immediate part of duties of the Management and each Employee of the Group, as well as other persons acting on behalf of or in the interests of the Group, and a provision of his/her employment or other contract to comply with requirements of Local regulatory documents, including this Policy.

Employees holding managerial positions of all levels are responsible for informing their subordinates with the requirements of this Policy. Managers of all levels shall be responsible, within the limits of their competence, for adherence to requirements of this Policy on behalf of their subordinates.

If an instance of fraud or corrupt actions on behalf of an Employee or involvement of an Employee in such actions has been established, the employer is entitled to impose disciplinary sanctions onto such Employee, up to dismissal from the company, in manner provided by applicable laws of the Russian Federation or other applicable law. If an instance of fraud or corrupt actions on behalf of a person or involvement of a person in such actions has been established, the Group is entitled to charge the person with liability and also (in certain cases) to terminate the relevant contract.

6.9 No countermeasures and sanctions

The Group protects interests of Relevant persons who have reported (including anonymous reports) about thefts, embezzlements, frauds, bribes, commercial bribes, Conflicts of interests and other violations in the Group which they became aware of, and Relevant persons who refused to commit such violation or be part of such violation as an intermediary.

No disciplinary punishments are imposed to Relevant persons described in the paragraph above.

VII. KEY ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-LEGALIZATION OF PROCEEDS RECEIVED FROM CRIME (ANTI-MONEY LAUNDERING) MEASURES

7.1 The Group shall investigate all reasonably justified reports regarding breach of anti-corruption, anti-fraud and anti-legalization of proceeds received from crime (anti-money laundering) rules and procedures and shall prevent committing of specified actions.

7.2 Hotline

The Group operates a Hotline, an information channel, with one of its goals and objectives to transmit and record information about discovery of fraud, corrupt or legalization of proceeds received from crime (money laundering) actions or any preparations thereto, or breach of the Code of Ethics, to receive proposals toward improvement of anti-corruption procedures or other internal control procedures. The Hotline functioning procedure is governed by this Policy, by the Code of Ethics and other Local regulatory documents.

Prevention of fraud or corrupt actions both within the Group and in its relations with Third parties is one of the fundamental principles of corporate conduct at the Group. By means of development of the above-mentioned principle, all reports by Relevant persons, Third parties, Associated persons, and other persons about any fraud or corrupt actions shall be recognized as examples of positive conduct. The Group is entitled to establish measures of recognition for its Employees or other persons providing trustworthy information about committed fraud and/or corrupt actions to the Hotline, or providing information, which may be instrumental in prevention or suppression of fraud and/or corrupt actions.

In order to prevent fraud or corrupt actions, whenever such instances of committed fraud or corrupt actions have been identified, or in case of reasonably justifiable suspicion in relation to committing/preparation to committing any

such actions on behalf of Associated persons, Relevant persons shall report the respective information either to Hotline, or directly to IADC, as well as (for Employees) to their immediate or next in line superior (except when such superior may be involved in committing of fraud or corrupt actions in the Employee's reasonable opinion). The information may be provided either verbally or in written form.

The information about committing fraud or corrupt actions, breach of the Code of Ethics, which is received at Hotline, shall be recorded as provided in the relevant procedure by commission on ethics of Limited Liability Company Irkutsk Oil Company.

If the received information contains facts of committed fraud or corruption actions, such information shall be submitted to IADC within 3 (Three) business days, where it must be registered and reviewed within 30 (Thirty) days.

The Group guarantees confidentiality of information obtained from Relevant persons or other persons through the Hotline, including non-disclosure of their personal details or the contents of the messages received. In addition, Relevant persons and other persons may provide information to the Hotline anonymously. Information provided to the Hotline, including personal details of the reporting person, shall be exclusively known to persons conducting preliminary reviews and internal investigations in relation to messages received.

Any pressure or any other negative impact onto the informant contradicts corporate values of the Group and this Policy. Any person resorting to such measures of impact shall be subjected to disciplinary sanctions. No sanctions may be applied to the Relevant person or other person for reporting in good faith a committed or suspected fraud or corrupt actions.

The person providing such information shall be advised to refrain from making the Hotline message or contents thereof publicly known, and to refrain from independent investigation actions.

The following methods can be used to provide information to Hotline:

- Hotline page on the Internet:
 - official website of the Group: <http://www.irkutskoil.ru>;
 - Internal corporate portal of Limited Liability Company Irkutsk Oil Company;
- interactive display panels located in Irkutsk and Ust-Kut (Irkutsk region) offices and at production facilities of the Group;
- Hotline telephone: 8-3952-283-101 or ext. 2585, by leaving a message on the recorder;
- Hotline postal address: 664007, Irkutsk, Prospekt Bolshoy Liteyny 4;
- E-mail, Skype for business for electronic messages: doverie@irkutskoil.ru.

7.3 Internal audit and compliance

In order to ensure reliability and accuracy of financial (accounting) statements, compliance with the requirements of legal acts and Local regulatory documents, prevention and revealing corrupt violations, the IAD:

- performs internal monitoring of business operations and financial monitoring including prevention of the following actions: drafting of unofficial (double) statements, absence of primary accounting documents, unrecorded operations or incorrect record of operations, nonexistent costs records, record of liabilities with a subject identified incorrectly, using falsified documents, deliberate destruction of documents and statements before the end of the term stipulated by the laws of the Russian Federation;
- performs internal audit;
- engages independent external auditors and issues the requirements for such auditors such as the requirement to inform about the indicators of corruption revealed as a result of audits; and
- reports to the Audit Committee and the Board of Directors about prevention and detection of corrupt violations.

In the course of the internal audit the IAD takes into account the following requirements of the Policy:

- it is necessary to check how the organizational procedures and rules of operation which are significant from the point of anti-corruption activities are complied with; and
- it is necessary to check the economic justification of operations which are performed in the area of Risk of corruption and Risk of fraud in relation to exchange of business Gifts, Representation expenses, charity donations, remuneration to agents, advisors, mediators, external consultants and compliance with the payment procedure under such cases as prescribed by the law.

Since the Risks of corruption and fraud and other factors may change through the time, the Group periodically monitors, checks and assesses the implemented anti-corruption procedures and, if needed, reviews and refines them.

7.4 Conducting internal investigations

Internal investigations shall be conducted in several stages. At the stage of preliminary assessment, any information about committed fraud and/or corrupt actions, Counterparties' actions associated with legalization (money laundering) of proceeds received from crime or any preparation thereto, shall be checked.

Performance of an internal investigation shall be assigned to a particular specialist of IADC, or a commission, which may be appointed for that purpose.

A commission for internal investigation may be composed of two or more Employees. The commission may include Employees from various divisions of Limited Liability Company Irkutsk Oil Company, which possess relevant experience and knowledge. The Chairman shall be appointed from among commission members. In the course of internal investigation, all facts and circumstances related to the object of investigation shall be established within the limits permitted by applicable laws of the Russian Federation and Local regulatory documents.

Employees in charge of conducting internal investigations shall be granted access to all information and documents of the Group necessary for that purpose. All Employees shall cooperate with the internal investigations being conducted, within the extent of their competence.

Information about conducting preliminary check and internal investigation, as well as information obtained in the course of preliminary check or internal investigation (including the message received on Hotline, personal details of its sender, personal details of the persons subject to check or investigation, the results of check) shall be protected against disclosure or release to any non-members of the investigation Commission and/or those not participating in decision-making process based on results of the internal investigation.

7.5 Charging with liability. Measures taken based on internal investigation results

If the results of internal investigation confirm the fact of committing fraud or corrupt actions, then measures to charge with liability Employees and other Relevant persons responsible for such actions shall be taken by resolution of General Director, Chairman of the Executive Board of Limited Liability Company Irkutsk Oil Company, on the grounds of internal investigation materials containing relevant comments and recommendations pertaining to liability to be imposed onto persons responsible.

Pursuant to Clause 6.8 of this Policy, committing fraud or corrupt actions on behalf of an Employee shall be recognized as gross violation of his/her job functions entailing disciplinary sanctions, including dismissal from the company on respective grounds, in manner provided by applicable laws of the Russian Federation.

In addition, by resolution of General Director, Chairman of the Executive Board of Limited Liability Company Irkutsk Oil Company, disciplinary actions may be taken toward the immediate superior, who permitted to exist or created conditions for the Employee to commit fraud or corrupt actions.

Counterparties may be charged with civil liability in accordance with provisions of civil contract entered by and between the Company and Counterparties, including Anti-corruption reservations.

Other persons may be charged with liability for corrupt actions in accordance with the Anti-corruption laws and standards, and the Group is entitled to inform law enforcement and other authorities about the revealed or suspected fact of corruption, fraud or other activities prohibited by the Anti-corruption laws and standards.

7.6 On the grounds of establishing the facts of fraud or corrupt actions, IADC, jointly with IAD, shall develop and submit to approval of the General Director, Chairman of the Executive Board of Limited Liability Company Irkutsk Oil Company, their proposals regarding improvement of the internal control system or other forms of prevention of fraud or corrupt actions at the Group, including proposals regarding improvement of the system of control over interaction of Relevant persons with Officials, improvement of informing and Employees and other Relevant persons

training in principles of zero tolerance of fraud and corruption, rules of corporate ethics, as well as taking other appropriate measures.

VIII. PROCEDURE FOR IMPLEMENTATION OF BUSINESS-PROCESSES WHICH ARE AT RISK OF FRAUD, CORRUPTION AND LEGALIZATION (MONEY LAUNDERING)

8.1 This Chapter of the Policy sets forth the main requirements to implementation of business processes of the Group which have the highest Risk of corruption (interacting with Officials, accepting and making Gifts, Representation expenses related to protocol events and business trips, Charity and Sponsorship, financial relations with Third parties) and Fraud (financial relations with Third parties), risks of cooperation with Counterparties involved in the legalization (money laundering) of proceeds received from crime (financial relations with Third parties). The detailed regulation of such business processes of the Group is made in accordance with Local regulatory documents.

8.2 Interaction with Officials

All Relevant persons whose job and other functions include communication and contacts with the Third parties on behalf of the Group should strictly follow the rules of corporate conduct specified by the Policy, the Code of Ethics and other Local regulatory documents. Special attention should be paid to monitoring the activities inside the personal responsibility zone in the course of interaction with Officials.

In order to strengthen the principles of corporate conduct in the course of interaction with Officials Relevant persons of the Group should adhere to the requirements of this Policy and the Code of Ethics. Relevant persons are obliged to avoid conduct which may be regarded by the Official as willingness of the Relevant person to commit corrupt actions or help committing corrupt actions. Such requirements shall cover all cases of interaction with Officials including oral and written enquiries and negotiations.

The Relevant person who received from the Official some information regarded by this Employee or other Relevant person as a request, demand, hint for transfer or extortion of financial gain or any other benefit for the Official or his/her Close relatives (for example, payment of some expenses of such persons or in the interest of such persons) should stop business contacts with such Official and immediately inform IACD (and for Employees) also his/her immediate supervisor, or send information to the Hotline.

To mitigate risks of corrupt actions in the course of interaction with Officials and other Third parties, the Group and Relevant persons shall refrain from payment of any expenses of Officials or other Third parties (as well as payment of expenses at the interest of such persons) except for Representation expenses made in accordance with the terms and conditions specified in the Policy and other Local regulatory documents.

8.3 Gifts and Representation expenses

The Group admits that exchange of business Gifts and Representation expenses for business entertainment are indispensable part of business and common business practice.

At the same time, such practice has certain Risk of corruption, as making expensive Gifts and high Representation expenses may cause justified suspicions about pursuing vested interests.

Relevant persons shall refrain from direct or indirect use of Gifts and/or Representation expenses as a tool for remuneration for decisions made by Third Parties and/or Officials for the benefit of the Group, as well as obtaining any other illegal benefits for the Group. The price of Gifts and Representation expenses shall be legal, reasonable and economically justified.

8.3.1. Making Gifts

Any Gifts which are made on behalf of the Group should comply with the requirements to the Protocol gifts specified by this Policy and other Local regulatory documents.

Giving inventories on behalf of the Group which do not meet the criteria of the Protocol gift and/or violate the procedure of making Protocol gifts shall not be allowed.

Making Protocol gifts shall have a legal basis and be justified. The price of Protocol gifts shall meet the criteria below. Making Gifts in cash, in the form of securities, gift certificates or in the form of payment for tourist and other services by Relevant Persons is not allowed.

In case an inventory which does not meet the criteria of the Protocol gift is given by the Relevant person or Associated person of the Group to any Third party or in case an inventory is given in violation of the procedure of making Protocol gifts, such inventory shall be deemed to have been given on behalf of and at the interest of the Relevant person or Associated person. The Group shall not be held liable for such action of Relevant persons and Associated persons.

If in the process of performing his/her job or other functions for the Group, the Relevant person has received from Counterparties, Third parties, or other persons any request or demand about transfer of any inventories, he/she shall immediately inform IACD and (if applicable) his/her immediate supervisor thereof and send information to the Hotline.

The price of the Protocol gift made to Officials shall not exceed 3,000 (Three thousand) rubles (or their equivalent in other currency as of the date of making a gift) (or other amount established by the Anti-corruption laws and standards) and shall not be connected with execution by such person of his/her duties.

The price of the Protocol gift (except for the cases described in the previous paragraph) shall not exceed 10,000 (Ten thousand) rubles, or their equivalent in other currency as of the date of making a gift) (or other amount established by the Anti-corruption laws and standards), unless otherwise instructed by the General

Director, Chairman of the Executive Board, or Chairman of the Board of Directors of Limited Liability Company Irkutsk Oil Company.

8.3.2. **Accepting Gifts**

Any Gift made to the Management or Employee by Counterparties or other Third parties working with the Group shall be deemed to have been accepted by the Employee as a representative of the Group in connection with his/her position.

Any Gift made to other Relevant person by Third party (to the extent that there is or may be any connection between making a Gift and interaction of the Third Party with the Group (or on behalf of or in the interests of the Group) shall be deemed to have been accepted by the Relevant person as a representative of the Group in connection with his/her functions performed for the Group. Employees and other Relevant persons are entitled to accept Gifts from Counterparties and other Third parties provided that the rules set forth by this Policy are complied with.

In order to create a single standard of corporate ethics the following Rules of accepting Gifts by Employees and other Relevant persons shall apply:

- 1) the Employee and (in connection with the activity on behalf of or in the interests of the Group) other Relevant person is entitled to accept unlimited inventories recognized as Gifts in accordance with the current business practice (flowers, pastries, fruits, alcohol, souvenirs) with the total price not exceeding 10,000 (Ten thousand) rubles (or their equivalent in other currency as of the date of making a gift) (or other amount established by the Anti-corruption laws and standards);
- 2) the Employee and (in connection with the activity on behalf of or in the interests of the Group) other Relevant person is prohibited to accept any monetary Gifts, gifts in the form of securities, gift certificates, or gifts in form of payment for tourist or other services;
- 3) the Employee and (in connection with the activity on behalf of or in the interests of the Group) other Relevant person shall have no right to accept the Gift in case there are some grounds to suggest that such Gift is targeted at influencing the objectivity of business decisions of the Employee and other Relevant person at performing his/her job or other functions;
- 4) the Employee and (in connection with the activity on behalf of or in the interests of the Group) other Relevant person who received the Gift which does not meet the criteria specified in Subclauses 1-3 above, shall be obliged to refuse from accepting the Gift. If there is no opportunity of returning the Gift, the Employee is obliged to inform his/her immediate supervisor and IACD thereof and send information to the Hotline as well as to transfer the ownership to such Gift to the respective company of the Group.

In the process of performing their job or other functions for the Group Employees and other Relevant persons are strictly forbidden to express any kind of request or demand to Counterparties and other Third parties about transfer of any inventories. Requests or demands to Counterparties or other Third parties about transfer of any

inventories are deemed to be corrupt actions and entail responsibility specified in this Policy and anti-corruption laws of the Russian Federation.

8.3.3. Gift register

Relevant persons shall report to the Hotline about all Gifts that (i) were made on behalf of the Group – within 30 calendar days from the date of their delivery; and/or (ii) were received by Employees and Relevant Persons (in the latter case, in connection with the activity on behalf of and in the interests of the Group) – within 30 calendar days from the date of their receipt.

IAD maintains a Gift register, which should contain, among other things, the following information:

- date of delivery or the date of receipt of the Gift;
- description of the Gift, sufficient for it to be identified;
- person who received the Gift;
- person who made the Gift;
- fact of acceptance of the Gift; and
- estimated price of the Gift.

8.3.4. Representation expenses

Representation expenses are made in accordance with this Policy and other Local regulatory documents.

Relevant persons who are entitled to organize protocol events shall receive and spend money in strict compliance with the criteria related to the Representation expenses.

Expenses of the Relevant person made in violation of the adopted criteria of the Representation expenses shall be deemed to be made on behalf of and at the cost of such Relevant person at his/her own interest not connected with performing his/her job or other functions. The Group shall not be held liable for such action of the Relevant person.

If in the process of performing his/her job functions the Relevant person has received from Third parties any request or demand to pay for expenses of Third parties or at the interest of Third parties, to render property-related services, to grant other material benefits in form of Representation expenses, he/she shall immediately inform IACD (and for Employee) also his/her immediate supervisor and thereof and send information to the Hotline.

8.4 Procedures for selecting Counterparties

Taking into account that procedures for selecting Counterparties related to procurements for the needs of the Group fall into the category of business processes with a high level of Risks of corruption and fraud, as well as Risks of cooperation with Counterparties involved in the legalization (money laundering) of proceeds received from crime, the Group sets forth the uniform principles of transparency and fairness for all procedures for selecting Counterparties.

Pursuant to the main anti-corruption and anti-fraud principles specified in Chapter 5 of this Policy, in the course of selecting Counterparties the Group is additionally governed by the following basic principles:

- 1) to establish clear and understandable conditions for implementation of procedures for selecting Counterparties;
- 2) to apply objective and understandable criteria of selecting Counterparties;
- 3) to create open and equal conditions for all participants of each procedure for selecting a Counterparty during the competition including provision to all participants of the same information regarding the procedure of selecting a Counterparty, determination of unified timing, creating unified requirements to the participants, explanation of participation conditions and establishment of the clearest criteria of defining the winner;
- 4) to have the system of internal control which supports the procedures for selecting Counterparties, establishment of the Beneficiary owner.

Before making the selection of Counterparties, IACD shall check the Counterparties for publicly available information on the Counterparty's violation of laws and/or business ethics, as well as assess the risk of performing any corrupt actions by the Counterparty. Based on the results of the audit, IACD shall either make a decision on admissibility of interaction between the Group and the relevant Counterparty, or on the need for further investigation of the Counterparty and the methods of such further investigation.

Further investigation of the Counterparty may be carried out, among other things, through the study of additional sources of publicly available information, as well as by obtaining feedback on the Counterparty from third parties.

Based on the results of further investigation, IACD submits the issue of admissibility (inadmissibility) of such interaction for consideration by the General Director, who resolves on the interaction of the Group with the Counterparty based on the results of further investigation.

The Group's relations with the Counterparties shall be properly documented and executed through the conclusion of contracts. Contracts concluded by the Group with Counterparties, as a general rule, shall contain an Anti-corruption reservation.

Contracts concluded with Counterparties shall secure all commercial agreements reached between the parties and provide for a fair market remuneration for the goods and/or services of the Counterparties. Making any payments for the benefit of Counterparties which are not provided for by the concluded contracts is not allowed.

In the work and interaction with Counterparties, Relevant persons shall exercise Due Diligence and inform their immediate supervisors, IACD, as well as report to the Hotline about all known facts of violations by Counterparties of business ethics rules, laws, as well as other significant circumstances that may create Risk of corruption.

8.5 **Financial relations with Third parties**

One of the key principles of the corporate conduct of the Group is to ensure effective monitoring over financial and business operations. Taking into account that business processes related to settlements with Third parties are exposed to the Risks of corruption and fraud, as well as Risks of cooperation with Counterparties involved in the legalization (money laundering) of proceeds received from crime, in order to mitigate such risks, the Group has a single principle of openness and transparency of its financial policy in the relations with Third parties.

To mitigate risks of corrupt and fraudulent actions, the financial policy of the Group with respect to any Third parties including Counterparties shall meet the following requirements:

- compliance of actual schemes of Third parties law relations with the documented conditions of such relations;
- minimization of settlements involving cash;
- cooperation on settlements and payments with banks having positive business reputation at the market of financial services.

Pursuant to the main anti-corruption principles specified in Chapter 5 of this Policy, the internal anti-corruption system within the frameworks of relations of the Group with Third parties includes measures targeted at assessment of potential risks of corruption at the transactions to be entered into and mitigation of such risks. Such measures include the procedures of verification of Counterparties including comprehensive review of operations of Counterparties, complex verification of their financial and market status.

The financial policy of the Group strictly prohibits the following:

- drafting unofficial statements;
- unrecorded operations or incorrect record of operations;
- nonexistent costs records;
- record of liabilities with a subject identified incorrectly;
- using falsified documents;
- destruction of primary accounting documents; documents drafted in accordance with entered transactions including contracts; documents relating to the procedures of competitive selection before the end of the term specified by the laws and Local regulatory acts;
- cooperation with Counterparties and other persons that are included by regulatory and governmental authorities, as well as by other reliable sources, in the list as potentially dangerous entities, which activities are associated with the legalization (money laundering) of proceeds received from crime.

Violation by the Employee of the above requirements of the financial policy of the Group is deemed to be a gross violation of job functions. In case it is revealed and established that the Employee has been a party to such violations, the Group is entitled to impose disciplinary sanctions onto such Employee, up to dismissal from the company, in manner provisioned by applicable laws of the Russian Federation.

Should the above facts be revealed and/or established, the Group will immediately initiate an in-house investigation. The in-house investigation is made in accordance with the same procedure as described in Clause 7.4 of this Policy.

To mitigate Risks of corruption and fraud, the Group actively cooperates with external and internal auditors and supervisory and law enforcement authorities and provides necessary information about its operations to them.

8.6 Charity

Charity is based on the requirements set forth by this Policy, internal regulatory document on social and economic cooperation and charity (sponsorship) of the Group and other Local regulatory documents. Charity for political purposes is not allowed.

Expenses of the Relevant persons made in violation of the established rules of Charity are deemed to have been made on behalf of and at the cost of such Relevant person at his/her own interest not connected with performing his/her job or other functions. The Group shall not be held liable for such actions of the Relevant person.

If in the process of performing his/her job functions the Relevant person of the Group has received from Third parties any request or demand to pay for expenses of Third parties or at the interest of Third parties, to render property-related services, to grant other material benefits in form of Charity, he/she shall immediately inform IACD (and for Employee – also his/her immediate supervisor) thereof and send information to the Hotline.

8.7 Sponsorship

Sponsorship is based on the requirements set forth by this Policy, internal regulatory document on social and economic cooperation and charity (sponsorship) of the Group, and other Local regulatory documents. Sponsorship for political purposes is not allowed.

Taking into account that Sponsorship falls into the category of business processes with a high level of Risks of corruption, the Group sets forth the following criteria towards Sponsorship: openness, transparency, justification of sponsorship goals and results of investments, drafting reports on money spent.

Expenses of the Relevant person made in violation of the established rules of Sponsorship are deemed to have been made on behalf of and at the cost of such Relevant person at his/her own interest not connected with performing his/her job or other functions for the Group. The Group shall not be held liable for such actions of the Relevant person.

IX. LEGAL AND METHODOLOGICAL BASIS OF THE POLICY

9.1 Legal basis of the Policy

At preparation of this Policy the requirements contained in the following regulatory documents were taken into consideration:

9.1.1. **International anti-corruption treaties including:**

- United Nations Convention against corruption dated October 31, 2003 ratified by the Russian Federation in form of Federal Law No. 40-FZ dated March 8, 2006 “On ratification of United Nation Convention against corruption”;
- Criminal Law Convention on Corruption (ETS No. 173) dated January 27, 1999 ratified by the Russian Federation in form of Federal Law No. 125-FZ dated July 25, 2006 “On ratification of Criminal Law Convention on Corruption”;
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions dated December 17, 1997;
- Good Practice Guidance on Internal Controls, Ethics, and Compliance adopted by the Working Group of OECD dated February 18, 2010 (Appendix to Recommendations on Combating Bribery of Foreign Public Officials); and
- other international legal anti-corruption standards.

9.1.2. **National anti-corruption and anti-fraud laws of the Russian Federation (as amended) including:**

- Constitution of the Russian Federation;
- Criminal Code of the Russian Federation;
- Russian Federation Administrative Offence Code dated December;
- Federal Law “On Combating Corruption”;
- Federal Law “On State Civil Service in the Russian Federation”;
- Federal Law “On Charity and Charity Organizations”;
- Federal Law “On ratification of the United Nations Convention against Corruption”;
- Federal Law “On joining of the Russian Federation to the Convention on Combating Bribery of Foreign Officials during International Commercial Transactions”;
- Federal Law “On Combatting Legalization (Laundering) of Proceeds from Crime and Financing of Terrorism”;
- Russian Federation President’s Decree No. 309 dated April 2, 2013 “On implementation of separate provisions of the Federal Law “On Combating Corruption”;
- Russian Federation President’s Decree No. 613 dated July 8, 2013 “On Anti-Corruption Issues” and approved “Procedure for publishing information about income, expenses, property and property liabilities of certain categories of people and their families at federal media for further publishing”;
- Russian Federation President’s Decree No. 147 dated April 1, 2016 “On National Plan to Combat Corruption in 2016-2017”;
- Russian Federation President’s Decree No. 378 dated June 29, 2018 “On National Plan to Combat Corruption in 2018-2020”;
- Russian Federation President’s Decree No. 478 dated August 16, 2021 “On National Plan to Combat Corruption in 2021-2024”; and
- Code of Corporate Governance recommended by the Central Bank of the Russian Federation (letter of the RF CB No. 06-52/2463 dated April 10, 2014).

9.1.3. **National anti-corruption laws of other countries including:**

- The UK Bribery Act 2010;
- The U.S. Foreign Corrupt Practices Act 1977;
- The UK Proceeds of Crime Act 2002;
- The UK Terrorism Act 2000;
- The Money Laundering Regulations 2007; and
- French Loi Sapin II (Law No. 2016-1691).

9.1.4. **Advisory anti-corruption regulatory documents including:**

- Model law “On Combating Corruption” (CIS Inter-Parliamentary Assembly, 13th Plenary session, Decision No. 13-4 dated April 3, 1999);
- Model law “Basics of laws on anti-corruption politics” (CIS Inter-Parliamentary Assembly, 22nd Plenary session, Decision No. 22-15 dated November 15, 2003);
- Review of recommendations on implementation of a complex of organizational, explanatory and other measures to prevent behavior of officials which may be deemed by others as a promise of bribe, or proposal to make a bribe, or consent to accept a bribe, or request for a bribe (Ministry of Labor and Social Protection of the Russian Federation, Information dated March 4, 2013); and
- The French Anticorruption Agency Guidelines.

9.2 **Methodological basis of the Policy**

At preparation of this Policy the following methodological basis was taken into consideration:

- Methodological recommendations of the Federal Property Management Agency on the organization of risk management and internal control processes in preventing and combatting corruption in joint stock companies with the participation of the Russian Federation;
- Methodological recommendations of the Ministry of Labor and Social Protection of the Russian Federation regarding the development and adoption of measures to prevent and combat corruption;
- Recommendations of the Great Britain Ministry of Justice regarding establishment and implementation of the system of procedures in accordance with the UK Bribery Act 2010 dated March 30, 2011;
- Transparency International the 2010 UK Bribery Act Adequate Procedures Guidance on good practice procedures for corporate anti-bribery programs;
- International Chamber of Commerce’s Rules of Conduct; and
- Transparency International Anti-Corruption Plain Language Guide 2010.

X. FINAL PROVISIONS

10.1 The Policy shall be approved by the Board of Directors.

The Board of Directors on a regular basis, but at least once in two years, shall assess the Policy in terms of its compliance with the applicable Anti-corruption laws and standards, other laws, and best international practices in this area.

The Company publishes the Policy and amendments thereto in Russian and English on the official website of the Group.

- 10.2 The Policy becomes effective from the date of its approval by the Board of Directors. Considering the changes and the practice of implementation of the Policy, the Policy may be updated. Updating of the Policy shall be made in accordance with the same procedure used at its adoption.
- 10.3 If, as a result of any changes in the laws and statutory acts of the Russian Federation, the Company Charter, or on other grounds, some chapters (clauses, subclauses) of the Policy shall be deemed invalid, unenforceable or void, such chapters cease to be in force; and until the relevant amendments are introduced into the Policy, the Group and other stakeholders shall act in accordance with the applicable laws and statutory acts of the Russian Federation and the Company Charter.