



APPROVED

by order of Director General of JOINT
STOCK «VOLGA SHIPPING»

_____ **Yu.B. Giltz**

No. 0008/22-22 of 29.09.2021

**ANTI-CORRUPTION POLICY
OF JOINT STOCK
“VOLGA SHIPPING”**

1. GENERAL PROVISIONS

1.1. The Anti-Corruption Policy of JOINT STOCK “VOLGA SHIPPING” (the Policy) is a set of interrelated principles, procedures and measures laid down in this document aimed at preventing and suppressing corruption offences in the activities performed by JOINT STOCK “VOLGA SHIPPING” (the Company) and defines basic requirements of anti-corruption laws of the Russian Federation binding on all of the Company’s employees and other persons acting on behalf of and/or as instructed by and/or in the interests of the Company.

1.2. This Policy is based on the provisions of Federal Law No. 273-FZ of 25 December 2008 On Combating Corruption, provisions of the Methodological Recommendations for the Development and Adoption by Legal Entities of Measures Aimed at Preventing and Combating Corruption, as approved by the Ministry of Labour and Social Protection of the Russian Federation on 08 November 2013, other regulations of the Russian Federation and the Company’s local regulations.

1.3. This Policy takes due regard to the fact that according to the laws of the Russian Federation, the “Corruption”, “Corrupt practices” and “Corrupt activities” are construed as the abuse of authority, commercial bribery, abuse of office, giving a bribe, receiving a bribe, or other illegal use by an individual of his/her official position contrary to the legitimate interests of the society and the state in order to obtain benefits in the form of money, valuables, other assets or services of a property nature, other property rights either for the aforementioned individual or for third parties, as well as the illegal provision of such benefits to this individual or other individuals.

1.4. This Policy establishes and defines:

1.4.1. Goals and objectives of this Policy.

1.4.2. The scope of this Policy and the persons to whom it applies.

1.4.3. Basic principles of this Policy.

1.4.4. The Company’s officials responsible for the implementation of this Policy.

1.4.5. Responsibilities of the Company’s management and employees in the field of prevention of corruption.

1.4.6. The list of measures implemented by the Company to prevent corruption.

1.5. This document shall be brought to the attention of all of the Company’s management, employees and representatives against signature.

2. BASIC TERMS, CONCEPTS AND ABBREVIATIONS

Anti-corruption Policy	A set of interrelated principles, procedures and specific measures aimed at preventing and combating corruption in the Company.
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<p>Corruption</p>	<p>Abuse by the Company’s employee of his/her position, giving a bribe, receiving a bribe, abuse of authority, commercial bribery or other illegal use of his/her labour (official) position, contrary to the legitimate interests of the society and the state in order to obtain benefits in the form of money, valuables, other assets or services of a property nature, other property rights either for the aforementioned employee or for third parties, as well as the illegal provision of such benefits to this employee of the Company by other individuals.</p> <p>Corruption also includes the aforementioned offences committed on behalf of the Company or in the latter’s interests.</p>
<p>Bribe</p>	<p>Giving and receiving by an employee of the Company, either personally or through an intermediary, of money, securities, other assets, or in the form of illegal provision of services of a property nature, provision of other property rights for actions (omission) to the benefit of the bribe giver or persons represented thereby, if such actions (omission) form part of the labour (official) powers of the Company’s employee, or if this employee can contribute to such actions (omission) by making use of his/her official position, as well as for general patronage or connivance at work.</p>
<p>Abuse of authority</p>	<p>The use by the Company’s employee performing managerial functions of his/her authority contrary to the Company’s legitimate interests and in order to gain benefits and advantages either for this employee or for third parties, or to cause damage to other persons.</p>
<p>Commercial bribery</p>	<p>Illegal transfer of money, securities, other assets to the Company’s employee performing managerial functions, provision of services of a property nature to this employee to the benefit of the giver, provision of other property rights for certain actions (omission) related to the official position held by this employee of the Company.</p>
<p>Corruption offence</p>	<p>Unlawful guilty act (action or omission) of the Company’s employee having signs of corruption and entailing disciplinary, criminal, civil or administrative liability in accordance with the law.</p>

<p>Counteraction to corruption</p>	<p>Activities performed by the federal state authorities, state authorities of constituent entities of the Russian Federation, local authorities, civil society institutions and the Company’s employees within the scope of their powers:</p> <ul style="list-style-type: none"> – To prevent corruption, including to identify and eliminate its causes (prevention of corruption); – To identify, prevent, suppress, solve and investigate corruption offences (combating corruption); – To eliminate consequences of corruption offences or bring them to a minimum.
<p>Prevention of corruption</p>	<p>Activities performed by the Company to introduce elements of the corporate culture, organizational structure, rules and procedures governed by internal regulations and ensuring the prevention of corruption offences.</p>
<p>Conflict of interest</p>	<p>A situation in which the personal interest (direct or indirect) of an employee of the Company or his/her interests in favour of a third party affects or may affect the proper, objective and impartial performance of his/her official duties with respect to the Company and result in a contradiction between such interest and the interests of the Company capable of causing economic damage and/or harm to the Company’s business reputation.</p>
<p>Personal interest</p>	<p>The possibility of obtaining illegal income in cash or in kind, or benefits directly by an employee of the Company by making use of his/her official powers, or by his/her family members, relatives and other persons to whom this employee has any financial or other obligations (including those arising from his/her business, friendship, family and other ties and relations, position held by this employee and his/her associates in another legal entity, shares, stakes and stakeholdings held by this employee and his/her associates in another legal entity).</p>
<p>Employee</p>	<p>An individual who has entered into employment</p>

	relationships with the Company.
Executive	Representatives (employees) of the Company whose official duties include the performance of managerial functions.
Counterparties	Russian or foreign legal entities and individuals, including individual entrepreneurs, with whom the Company has contractual relations, except for labour relations, or intends to enter into such relations.
Responsible officer (The “RO”)	The Administrative Director of the Company and the director of the Company’s Security Department are the Company’s authorized officers responsible for the implementation of this Policy.

3. GOALS AND OBJECTIVES OF THIS POLICY

3.1. The Company has adopted this Anti-corruption Policy in pursuance of federal anti-corruption laws of the Russian Federation to express its commitment to, and compliance with, high ethical standards and principles of open and honest business, as well as the Company’s desire to enhance the corporate culture, adhere to the best corporate governance practices and keep the Company’s business reputation at the appropriate level.

3.2. The Company pursues the following goals:

3.2.1. To ensure that the Company’s activities comply with the anti-corruption laws of the Russian Federation.

3.2.2. To bring corruption risks, including those related to the involvement of the Company’s employees and management in corruption activities, to a minimum.

3.2.3. To create a unified approach to the organization of anti-corruption work in the Company for the Company’s management, employees, shareholders and other persons related to the Company, including its counterparties;

3.2.4. To make the Company’s management and employees intolerant to corrupt behaviour.

3.2.5. The Company’s management and employees must be acquainted and must comply with the principles and requirements of this Policy, basic provisions of the anti-corruption laws of the Russian Federation, and adequate anti-corruption procedures.

3.3. The objectives of this Policy are as follows:

3.3.1. Determining the Company’s officers responsible for the implementation of this Policy (the ROs).

3.3.2. Informing the Company’s employees of the regulatory and legal support of work performed to prevent corruption and engage responsibility for corruption offences;

3.3.3. Establishing basic principles of work performed to prevent corruption in the Company;

3.3.4. Developing and implementing measures aimed at preventing and combating corruption in the Company;

3.3.5. Securing the Company’s responsibility for failure to comply with this Policy.

3.3.6. Explaining the Company’s intolerance to all forms and manifestations of corruption.

4. THE SCOPE OF THIS POLICY AND THE PERSONS TO WHOM IT APPLIES

4.1. Director General of the Company bears responsibility for ensuring that the directors of structural units and the Company’s employees comply with the requirements of the anti-corruption laws of the Russian Federation and the anti-corruption standards in the performance of their labour (official) duties.

4.2. The principles and requirements of this Policy apply to all of the Company’s management and employees, regardless of their position and functions.

4.3. The provisions of this Policy may apply to other individuals and legal entities acting on behalf of and/or as instructed by and/or in the interests of the Company, provided that the relevant obligations are prescribed by contracts with such persons, internal documents, or directly follow from the law.

5. BASIC PRINCIPLES OF THIS POLICY

5.1. The principle of compliance of this Policy with applicable laws and generally accepted rules of law.

The Company carries out anti-corruption measures in accordance with the laws of the Russian Federation, as well as international treaties concluded by the Russian Federation and generally accepted rules of law.

5.2. The principle of open business.

Notifying the Company’s counterparties and partners, as well as the public about anti-corruption standards and procedures adopted by the Company.

5.3. The principle of personal example set by the management.

Director General of the Company, directors of the Company’s structural units and their deputies must create an ethical standard of absolute intolerance to any forms and manifestations of corruption at all levels, setting an example by their behaviour and promoting the goals, objectives and principles of this Policy among all of the Company’s employees and counterparties and establishing internal corruption prevention systems.

5.4. The principle of intolerance to corruption.

The Company adheres to the principle of intolerance to any forms and manifestations of corruption in all types of activities, which shall be construed as an absolute prohibition of corrupt actions (omission) on the part of the Company’s management, employees and counterparties, committed whether directly or through the intermediary of third parties, including in the form of mediation, regardless of the established business practices in a particular country.

5.5. The principle of employee involvement.

Raising awareness of the Company’s employees about provisions of the anti-corruption laws of the Russian Federation and their active participation in the establishment and implementation of anti-corruption standards and procedures.

5.6. The principle of assessment of corruption risks.

5.6.1. The Company establishes the following basic procedure for assessing corruption risks:

5.6.1.1. Identifying “critical points” – identification of work, services and activities that are most prone to corruption offences;

5.6.1.2. Describing potential corruption offences for each type of work, services and activities that are most prone to corruption offences;

5.6.1.3. Preparing a “roadmap of the Company’s corruption risks” - a brief description of “critical points” and eventual corruption offences;

5.6.1.4. Identifying positions of the Company’s employees characterized by a high level of corruption risks;

5.6.1.5. Developing a set of measures aimed at eliminating corruption risks or bringing them to a minimum.

5.6.2. For the purposes of analysing corruption risks, all available information related to corruption risks, both from internal and external sources, shall be used;

5.6.3. Information on risks identified serves as the basis for the development and analysis of current anti-corruption procedures.

5.7. The principle of effectiveness of anti-corruption procedures:

5.7.1. The Company ensures the implementation of, and compliance with, such generally accepted anti-corruption procedures that are low-cost, easily implemented and yield significant results;

5.7.2. The Company shall arrange for confidential methods of disseminating information across the Company’s Director General and the ROs through the Hot Line using one of the following options:

– By phone (24/7)/a message left on the answering machine at **+7 (831) 416-21-21;**

– By email at **nocrime@volgaflot.com;**

– By mail at: **15/A, pl. Markina, 603001, Nizhny Novgorod, marked as follows: “For the hotline”.**

5.7.3. Anti-corruption procedures and the procedure for their implementation shall be developed with due regard to the Company’s corruption risks and determined by the relevant local regulations of the Company;

5.7.4. Anti-corruption procedures shall be reviewed, improved and updated in response to the changes in the Company’s external and internal environment.

5.8. The principle of proportionality of the anti-corruption procedures to corruption risks.

The Company develops and implements a set of measures aimed at reducing the risk of involvement of the Company’s management and employees in corruption based on the Company’s current corruption risks.

5.9. The principle of due diligence in the Company’s activities and the decision-making process.

5.9.1. In its interactions with third parties, the Company adheres to the principle of due diligence and makes reasonable efforts to bring the risk of business relations with those counterparties that may be involved in corrupt activities to a minimum;

5.9.2. The Company establishes and maintains business relationships with those counterparties that conduct business relationships on a good faith and decent basis, value their reputation, demonstrate support for high ethical standards in their business activities, implement anti-corruption measures, and take part in collective anti-corruption initiatives;

5.9.3. The Company verifies its counterparties’ tolerance to bribery, including whether or not its counterparties have their local anti-corruption regulations, their readiness to comply with this Policy and to include anti-corruption provisions (clauses) in

contracts, as well as to assist each other to conduct ethical business and prevent corruption;

5.9.4. The Company verifies its counterparties (collects and analyses publicly available information about counterparties: their reputation in the business community, duration of their activity in the market, participation in corruption scandals, etc.) in accordance with the laws of the Russian Federation, including those in the field of personal data protection;

5.9.5. The verification shall be conducted on a risk-based approach, according to which it must be proportionate to the level of corruption risks associated with cooperation with the relevant counterparty.

5.10. The principle of information and training support:

5.10.1. The Company publishes this document on the official website in the Internet, declares openly its intolerance to corruption, welcomes and encourages compliance with the principles and requirements of this Policy by all management and employees of the Company, counterparties and other persons acting on behalf of and/or as instructed by and/or in the interests of the Company;

5.10.2. The Company's management and employees, counterparties, as well as other persons acting on behalf of and/or as instructed by and/or in the interests of the Company, shall be informed, in the manner prescribed by the Company, about their obligation to comply with the anti-corruption laws of the Russian Federation and this Policy;

5.10.3. Prior to starting cooperation with counterparties, the Company shall inform them, in the manner prescribed, of anti-corruption procedures effective in the Company;

5.10.4. The Company's management and employees must be acquainted and must comply with the anti-corruption principles, the anti-corruption laws of the Russian Federation, this Policy, the Code of Business Conduct of the Company's employees, as well as provisions of other local anti-corruption regulations of the Company;

5.10.5. The Company shall train its employees so as to create their anti-corruption worldview, intolerance to corrupt behaviour, increase the level of legal awareness and legal culture through anti-corruption education and anti-corruption consulting.

5.10.6. Directors shall organize anti-corruption training for employees of their structural units.

5.11. Principle of control and regular monitoring:

5.11.1. Regular monitoring of the effectiveness of anti-corruption standards and procedures, and control over their implementation;

5.11.2. Based on the principle of intolerance to corruption, the Company shall investigate all reports of alleged corruption offences in the manner prescribed.

5.12. The principle of waiver of retaliatory sanctions.

5.12.1. The Company guarantees that it will not apply any sanctions, including those in the form of dismissal, demotion, deprivation of bonuses, to its management and employees for:

5.12.1.1. Refusal to give a bribe, to engage or take part in commercial bribery, refusal to mediate in bribery (commercial bribery), including in cases where this refusal results in the Company's losses (lost profit) or failure to obtain commercial and/or competitive advantages, as well as for refusal to engage in other corruption offences in personal interests or in the interests of the Company;

5.12.1.2. Informing about cases when the Company’s director or employee is inclined to engage in corruption offences;

5.12.1.3. Informing about breaches of this Policy, with the exception of malicious false reporting.

5.12.2. The Company shall ensure the confidentiality of information received about corruption offences.

5.13. The principle of responsibility and inevitability of punishment.

The inevitability of punishment for the Company’s management and employees engaged in corruption offences related to the performance of labour (official) duties, regardless of the position held, length of service and other factors, as well as the personal responsibility of the Company’s Director General for the implementation of the anti-corruption policy.

5.14. Checking the Company’s management and employees for compliance with the above principles.

The Company shall periodically verify whether or not its directors and employees have a conflict of interest, comply with the provisions of this Policy and the Company’s local anti-corruption regulations.

6. OFFICIALS RESPONSIBLE FOR THE IMPLEMENTATION OF THIS POLICY

6.1. The Company’s Director General assumes responsibility for the organization of all events aimed at preventing corruption in the Company.

6.2. The Company’s Administrative Director and the director of the Company’s Security Department are ROs.

6.3. Key responsibilities of ROs:

6.3.1. Preparing recommendations for making decisions related to the prevention of corruption in the Company;

6.3.2. Preparing proposals aimed at eliminating the causes and conditions giving rise to corruption risks in the Company;

6.3.3. Developing draft local regulations aimed at the implementation of measures to prevent corruption in the Company and submitting them for approval to the Company’s Director General;

6.3.4. Carrying out control measures aimed at identifying corruption offences committed by the Company’s employees;

6.3.5. Organizing the assessment of corruption risks;

6.3.6. Accepting and considering reports on alleged actions taken to incline the Company’s employees to engage in corruption offences in the interests or on behalf of another legal entity, as well as on corruption offences committed by the Company’s employees or other persons acting on behalf of and/or as instructed by and/or in the interests of the Company;

6.3.7. Organizing work involving consideration of reports on alleged conflict of interest;

6.3.8. Assisting authorized representatives of control, supervisory and law enforcement authorities in conducting inspections of the Company’s activities related to the prevention of corruption;

6.3.9. Assisting authorized representatives of law enforcement authorities carrying out activities aimed at suppressing or investigating corruption offences and crimes, including investigation activities;

6.3.10. Organizing events aimed at preventing and combating corruption in the Company;

6.3.11. Individual counselling of the Company’s employees;

6.3.12. Participating in the organization of anti-corruption propaganda;

6.3.13. Annual assessment of the results of the Company’s work on the prevention of corruption and preparation of the relevant reports for the Company’s Director General.

6.4. The Company’s Director General shall be entitled to bring the Company’s employee to disciplinary liability for a failure to fulfil his/her obligations to prevent and combat corruption, provided that such obligations are enshrined in job descriptions.

7. RESPONSIBILITIES OF THE COMPANY’S MANAGEMENT AND EMPLOYEES IN THE FIELD OF PREVENTION OF CORRUPTION

7.1. When performing their labour (official) duties prescribed by employment contracts, all of the Company’s management and employees, regardless of their position and length of service in the Company, must be guided by this Policy and strictly observe its principles and requirements.

7.2. Compliance by the Company’s employee with the requirements of this Policy shall be taken into account when assessing his/her business qualities, including in case of appointment to a higher position or solving other HR issues.

7.3. Obligations of the Company’s employees related to the prevention of, and counteraction to, corruption may be either general, i.e. binding on all of the Company’s employees, or special, i.e. binding on certain categories of employees.

7.4. General obligations of the Company’s employees related to the prevention of, and counteraction to, corruption are as follows:

7.4.1. To refrain from committing corruption offences in the interests or on behalf of the Company and/or participating in such offences.

7.4.2. To refrain from any behaviour capable of being interpreted as a willingness to commit a corruption offence in the interests or on behalf of the Company and/or participating in such offence.

7.4.3. To promptly notify the immediate supervisor and the RO about actions taken to incline the Company’s employee to engage in a corruption offence.

7.4.4. To promptly notify the Company’s Director General or the RO of information brought to the attention of the Company’s employee about corruption offences committed by other employees of the Company, its counterparties or other persons acting on behalf or in the interests of the Company.

7.4.5. To notify the Company’s Director General or the RO about an eventual (potential) or real (emerged) conflict of interest.

7.5. The following officials of the Company may have special responsibilities related to the prevention of, and counteraction to, corruption:

7.5.1. Management of the Company;

7.5.2. The ROs;

7.5.3. The Company’s employees holding positions associated with high corruption risks, including the risks of a conflict of interest;

7.5.4. The Company’s employees in charge of internal control and audit;

7.6. General and special responsibilities shall be reflected in job descriptions of the Company’s employees.

7.7. In case a director or an employee of the Company has any doubts about whether or not his/her actions (omission) comply with the anti-corruption laws of the Russian Federation, this Policy, the Code of Business Conduct of the Company’s employees and other local regulations of the Company, he/she must discuss this situation with the immediate supervisor and/or the RO.

7.8. If there is information or allegation of an violation of the laws of the Russian Federation in the field of counteraction to corruption, the provisions of this Policy, the Code of Business Conduct of the Company’s employees and other local regulations of the Company, including that resulting from employees’ own actions (omission), management and employees of the Company must immediately inform the RO thereof.

7.9. If officials, foreign officials, officials of a public international organization, or other persons induce someone to commit corrupt acts or actions (omission) that can be interpreted as an induction to commit a corruption offence (crime), management and employees of the Company must immediately inform the RO thereof.

8. LIST OF MEASURES ON THE PREVENTION OF CORRUPTION IMPLEMENTED IN THE COMPANY.

Area	Measure
Regulatory support, enshrining standards of conduct and declaration of intent	Development and adoption of the Code of Business Ethics and Service Conduct of the Company’s employees.
	Development and implementation of regulations on the settlement of conflicts of interest in the Company.
	Introducing provisions on compliance with anti-corruption standards (anti-corruption clause) into contracts related to the Company’s business.
	Introducing anti-corruption provisions into employment contracts with the Company’s employees, and employees’ duties in the field of prevention of corruption in the relevant job descriptions.
Development and implementation of special anti-corruption procedures	Introduction of the procedure whereunder the Company’s employee can inform the Company’s Director General and/or the RO and his/her immediate supervisor about cases when the Company’s director or employee is inclined to engage in corruption offences, and the procedure for considering such reports.
	Introduction of the procedure whereunder the Company’s employee can inform the Company’s Director General and/or the RO and his/her immediate supervisor about information brought to the attention of the Company’s employee about corruption offences

	committed by other employees of the Company, its counterparties or other persons acting on behalf of and/or as instructed by and/or in the interests of the Company, and the procedure for considering such reports.
	Introduction of the procedure whereunder the Company’s employee can inform the Company’s Director General and/or the RO and his/her immediate supervisor about a conflict of interest and the procedure for settlement of the identified conflict of interest.
	Introduction of protection procedures for the Company’s employees who report corruption offences in the Company’s activities.
Training and information support of the Company’s employees	Bringing the Company’s local regulations in the field of preventing and combating corruption in the Company to the attention of the Company’s employees, against signature, when entering into employment contracts and adopting local regulations.
	Conducting training on the prevention of corruption and counteraction thereto
	Organization of individual counselling for the Company’s employees on the application of anti-corruption standards and procedures (ensuring compliance therewith), and performance of their duties.
Assessment of the results of ongoing anti-corruption work	Preparation of reports on work performed in the field of combating corruption and results achieved and submitting them to the Company’s Director General.

9. PAYMENTS THROUGH INTERMEDIARIES OR TO THE BENEFIT OF THIRD PARTIES

9.1. The Company and its employees shall be prohibited from engaging or using counterparties, intermediaries, partners, joint ventures or other persons to perform any actions that run counter to the principles and requirements of this Policy or the applicable anti-corruption laws.

9.2. In order to suppress the risks of the Company’s involvement in corruption activities and to bring such risks to a minimum, the Company checks its counterparties and intermediaries for their reliability, affiliation with state officials, state companies (corporations) and structures.

10. GIFTS AND REPRESENTATION EXPENSES

10.1. Gifts that employees may present on behalf of the Company to other individuals and legal entities, or that the Company’s employees may accept from other individuals and legal entities in connection with the performance of their labour (official) duties in the Company, as well as representation expenses, including hospitality expenses

and expenses related to the Company’s promotion that may be incurred by employees acting on behalf of the Company, must meet all of the following criteria:

10.1.1. They must be directly related to the legitimate goals of the Company’s activities (such as a presentation or completion of a business project; successful fulfilment of the contract (agreement); celebration of a national holiday/memorable date or anniversary);

10.1.2. They must be reasonable, proportionate and must not constitute luxury items. The cost of a gift shall not exceed 3,000.00 (Three thousand) rubles;

10.1.3. They must not represent a hidden reward for services, actions (omission), connivance, patronage, granting of rights and opportunities, decision taken with respect to a transaction, consent, license, permission, etc. or for an attempt to influence the recipient in pursuance of any other unlawful or unethical purpose;

10.1.4. They must not create a reputational risk for the Company, employees and other persons acting on behalf of and/or as instructed by and/or in the interests of the Company shall information about gifts or representative expenses be disclosed;

10.1.5. They must not run counter to the principles and requirements of this Policy, the Code of Business Conduct of the Company’s employees, other local regulations of the Company and applicable laws;

10.1.6. The expenses and cost of gifts must be approved by the Company’s Director General.

10.2. Gifts in the form of branded souvenirs (low-cost products) provided at exhibitions, presentations and other events where the Company officially participates, shall be allowed and construed as materials improving the Company’s image.

10.3. Gifts and signs of business hospitality offered to third parties on behalf of the Company, its employees and representatives in the monetary form, both in cash and non-cash, regardless of the currency, are not allowed.

11. INTERNAL CONTROL AND AUDIT

11.1. The Company’s internal control and audit system contributes to the prevention and identification of corruption offences in its activities.

11.2. With respect to the implementation of measures aimed at preventing corruption, the internal control and audit pursue the goal of ensuring the accuracy and reliability of the Company’s financial statements and compliance of the Company’s activities with the laws of the Russian Federation and local regulations of the Company.

11.3. In order to implement measures aimed at preventing corruption, the Company carries out the following activities in the field of internal control and audit:

11.3.1. Verification of compliance with various organizational procedures and operating rules significant for the prevention of corruption;

11.3.2. Control over the document support of the Company’s economic activities;

11.3.3. Analysis of the economic feasibility of operations performed in the areas of corruption risk.

11.3.4. The verification of compliance with organizational procedures and operating rules significant for the prevention of corruption covers both special anti-corruption rules and procedures referred to in Section 9 of this Policy, and other rules and procedures laid down in the Code of Business Conduct for the Company’s employees.

11.4. Control over the document support of the Company’s economic activities is first of all related to the Company’s obligation to keep financial (accounting) statements and aims at preventing and identifying the following violations: preparation of unofficial reports, use of forged documents, record of non-existent expenses, lack of source accounting documents, corrections introduced in documents and reports, destruction of documents and reports until expiration of the statutory period, etc.

11.5. The analysis of economic feasibility of operations performed in the areas of corruption risk extends to the exchange of business gifts, representation expenses, charitable donations, remuneration, and takes due regard to the following circumstances (signs of unlawful actions):

11.5.1. Payment for services, whereof the nature is not defined or is doubtful;

11.5.2. Provision of gifts, payment for transport, entertainment services, issuance of loans on preferential terms, provision of other values or benefits to the Company’s employees, employees of affiliated persons and counterparties;

11.5.3. Payment of remuneration to an intermediary or a counterparty in an amount exceeding the usual amount of payment or payment for similar services made by the Company;

11.5.4. Purchases or sales at such prices that significantly differ from market ones;

11.5.5. Questionable cash payments.

12. PARTICIPATION IN CHARITABLE ACTIVITIES AND SPONSORSHIP

12.1. The Company may take part in charitable projects acting as an organizer (co-organizer) of an event aimed at raising funds to help people with disabilities and those in difficult life situations, inform employees about charitable events.

12.2. The Company’s employees may collectively, either on their own behalf or anonymously, take part in charitable events, transfer funds to assist people with disabilities and those in difficult life situations.

12.3. The Company does not finance charitable and sponsor projects in order to obtain any unlawful advantages or preferences related to its economic activities.

The Company takes part in charitable activities and implements projects in the field of corporate social responsibility in accordance with the Company’s local regulations in the relevant areas.

12.4. The Company shall publish information about charitable and sponsorship activities on its official website or disclose it in another way.

13. PARTICIPATION IN POLITICAL ACTIVITIES

The Company does not finance political parties, organizations and movements in order to gain commercial advantages in the Company’s projects.

14. COOPERATION WITH STATE CONTROL (SUPERVISION) AUTHORITIES AND LAW ENFORCEMENT AUTHORITIES IN THE FIELD OF ANTI-CORRUPTION

14.1. The Company shall report to law enforcement agencies about all corruption offences brought to the attention of the Company.

14.2. The Company shall notify law enforcement authorities about corruption offences brought to the attention of the Company through its ROs.

14.3. The Company shall refrain from imposing any sanctions on its employees who have provided state control (supervision) authorities and law enforcement authorities with information that they have learnt in the course of performance of their labour (official) duties about the preparation or commission of a corruption offence.

14.4. Cooperation with the state control (supervision) authorities and law enforcement authorities shall take the following forms:

14.4.1. Assisting authorized representatives of state control (supervision) authorities and law enforcement authorities in carrying out control and supervisory activities in the Company in the field of preventing and combating corruption;

14.4.2. Assisting authorized representatives of law enforcement authorities carrying out activities aimed at suppressing or investigating corruption offences, including investigation activities;

14.5. The Company's management and employees shall assist law enforcement authorities in the identification and investigation of corruption offences, take measures required to preserve documents and information related to corruption offences and transfer them to law enforcement authorities.

14.6. The Company's management and employees shall not allow interference with the activities performed by officials of state control (supervision) authorities and law enforcement authorities.

14.7. The Company shall refrain from paying any expenses to be incurred by state officials and their close relatives (or in interests thereof) in order to gain commercial advantages in the Company's projects, including transport, accommodation, food, entertainment expenses, expenses related to PR-campaigns, etc. or to gain other benefits at the expense of the Company.

15. RESPONSIBILITY FOR FAILURE TO COMPLY WITH THIS POLICY AND VIOLATION OF THE ANTI-CORRUPTION LAWS

15.1. All of the Company's employees must be guided by this Policy and strictly observe its principles and requirements.

15.2. Directors of the Company's structural units bear responsibility for monitoring their subordinates' compliance with this Policy.

15.3. Persons who have breached this Policy and the anti-corruption laws of the Russian Federation may be brought to disciplinary, administrative, civil or criminal liability at the initiative of the Company, law enforcement authorities and other persons in the manner and on the grounds provided for by the laws of the Russian Federation, the Company's Charter, local regulations and employment contracts.

16. PROCEDURE FOR REVISING AND AMENDING THE ANTI-CORRUPTION POLICY

16.1. The Company regularly monitors the effective implementation of its anti-corruption policy.

16.2. The RO prepares an annual report on the implementation of measures aimed at preventing corruption in the Company, and submits it to the Company's Director

General. Based on this report, the Company may introduce amendments into its Anti-Corruption Policy.

16.3. The Company may revise this Policy in case of amendments introduced into the labour laws, anti-corruption laws, as well as in case of a change in the form of incorporation and staff structure of the Company.

17. FINAL PROVISIONS

17.1. This Policy shall be approved by the order of the Company’s Director General and shall enter into force from its approval.

17.2. This Policy shall remain valid until it is cancelled or until a new Policy is adopted.