



INLINE GROUP JSC
Quality Management System

Anti-Corruption Policy

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Anti-Corruption Policy

Instead of the Anti-Corruption Policy
dated April 09, 2019

APPROVED

CEO

_____ A.I. Romashkin

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Foreword

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Anti-Corruption Policy

1. Purpose, Goals and Objectives

1.1. This documented procedure of INLINE GROUP Joint-Stock Company (hereinafter referred to as “Company”) the Anti-Corruption Policy was developed in compliance with the requirements of Article 13.3 of Federal Law of the Russian Federation No 273-FZ dated 25.12.2008 “On Combating Corruption” and in accordance with the Guidelines for Development and Adoption of Measures by Organisations to Prevent and Combat Corruption developed (issued) by the Ministry of Labour and Social Protection of the Russian Federation and available on the website <http://www.rosmintrud.ru>.

1.2. The Anti-Corruption Policy outlines the main principles, procedures and measures aimed at preventing and suppressing corruption offences in the activities of Company.

1.3. The goals of the Anti-Corruption Policy are prevention and avoidance of corruption offences in the Company’s activities.

1.4. The objectives of the Anti-Corruption Policy are as follows:

- ensure that the Company’s employees comply with the principles and requirements of the Anti-Corruption Policy and are aware of the provisions of the anti-corruption laws applicable to the Company’s activities;
- form a uniform understanding of the Company’s policy on non-acceptance of corruption in any form or manifestation among the Company’s employees, contractors and any other persons;
- to create a system of measures, procedures and mechanisms in the Company aimed at preventing and combating corruption.

2. Normative References

2.1 When developing this standard, the Company used the requirements and recommendations of the following regulatory documents:

Federal Law of the Russian Federation dated December 25, 2008 No. 273-FZ “On Anti-Corruption”
Criminal Code of the Russian Federation

3. Terms and Definitions

This documented procedure uses the terms of the Federal Law of the Russian Federation “On Combating Corruption” and the Criminal Code of the Russian Federation, as well as the following terms with the corresponding definitions:

3.1 Corruption means abuse of office, giving or receiving bribes, abuse of power, commercial bribery or any 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 involving property, other property rights for himself/herself or for third parties, or illegal provision of such benefits to the said individual by other individuals. Corruption also means committing the above-mentioned acts on behalf or for the benefit of a legal entity (paragraph 1, Article 1 of Federal Law of the Russian Federation No 273-FZ dated 25.12.2008 “On Combating Corruption”).

3.2. Combating corruption means activities that are undertaken, within their powers, by federal government authorities, government authorities of the constituent entities of the Russian Federation, local bodies, civil society institutions, organisations, and individuals (paragraph 2, Article 1 of Federal Law of the Russian Federation No 273-FZ dated 25.12.2008 “On Combating Corruption”) and aimed at:

- prevention of corruption, including identification and subsequent elimination of causes of corruption (prevention of corruption);
- detection, prevention, suppression, finding and investigation of corruption offences (fight against corruption);
- minimization and/or elimination of consequences of corruption offences.

3.3. Prevention of corruption means organisation's activities aimed at introducing elements of corporate culture, rules and procedures governed by internal regulations that ensure prevention of corruption offences. Organisation means a legal entity regardless of its form of incorporation, business type or industry affiliation. Contractor means any Russian or foreign legal entity or individual with whom the Company enters into contractual relations, except for labour relations.

3.4. Bribe means bribe-taking by an official, a foreign official or an official of a public international organization in person or through an intermediary, in the form of money, securities or other assets or in the form of unlawful rendering thereto services of property nature, or granting other property rights (including when such official causes the bribe to be transferred to another natural or legal person), for actions (omission) in favour of a bribe-giver or the persons he/she represents, if such actions (omission) form part of the official's official powers or if the official, by virtue of his/her official position, may further such actions (omission), and also for overall patronage or connivance in the civil service (Part 1, Article 290 of the Criminal Code of the Russian Federation).

3.5. Commercial bribery means the illegal transfer of money, securities or any other assets to a person who discharges managerial functions in a profit-making or any other organization, and likewise, unlawful rendering of property-related services, granting other property rights to him/her (including when assets are transferred, or property-related services are rendered, or property rights are granted to another natural or legal entity at the direction of such a person) for the commission of actions (omission) in the interests of the giver or any other persons, if such actions (omission) form part of such person's official powers or if the official, by virtue of his/her official position, may further such actions (omission) (Part 1, Article 204 of the Criminal Code of the Russian Federation).

3.6. Conflict of interests means a situation when personal interest (direct or indirect) of an employee (representative of an organization) affects or may affect the proper, objective and impartial performance of their official (job) duties.

3.7. Personal interest of an employee (representative of an organization) means an opportunity for an employee (representative of an organization) to receive income in the form of money, other assets, including property rights, property-related services, work deliverables, or any benefits (advantages) for themselves or third parties during the performance of their official (job) duties.

3.8. Corrupt practices mean actions (omission) of the Company's employees that contain signs of corruption or contribute to its commission.

3.9. Anti-corruption assessment means an activity to prevent inclusion of any provisions in draft documents that contribute to creating conditions for corruption, to identify and eliminate such provisions in existing documents.

4 Accepted Abbreviations

FZ - Federal Law

UK - Criminal Code

5. Responsibility

5.1 The HR Director is responsible for the development and updating of this documented procedure of the Company.

5.2 The Quality Service Head is responsible for the provision of teaching materials.

5.3 The Company's employees are responsible for compliance with the implementing procedures of the Anti-Corruption Policy provisions.

6. Procedure for Revising and Amending the Company's Anti-Corruption Policy.

6.1 The changes and additions to the Anti-Corruption Policy are made in the following cases:

- revealing the lack of effectiveness of the implemented anti-corruption measures;
- the changes in the legislation of the Russian Federation applicable to the implementation of the Anti-Corruption Policy.

6.2 The changes and additions to the Anti-Corruption Policy are made by the CEO's order.

6.3 The proposals for changes and additions to the Anti-Corruption Policy can be made by all Company's employees to their immediate heads of structural divisions. The latter, in agreement with the person in charge of this structural division, the Deputy General Director, send the appropriate proposals for consideration and decision making to the CEO.

7. Implementation of the Anti-Corruption Policy

7.1. Basic Principles of the Company's Anti-Corruption Activities

7.1.1. The principle of compliance of the Company's policy with the applicable laws and generally accepted standards.

The Company shall implement anti-corruption measures in accordance with the Constitution of the Russian Federation, international agreements entered into by the Russian Federation, the laws of the Russian Federation and other regulations applicable to the Company.

7.1.2. The principle of personal example of the Company's management.

The Company's management shall create a culture of intolerance to corruption in any form by personal example and play a key role in creating the internal system for preventing and combating corruption.

7.1.3. The principle of employee engagement.

Employees of the Company shall be informed of the provisions of the anti-corruption laws and shall take an active part in the development and implementation of anti-corruption measures and procedures.

7.1.4. The principle of the adequacy of anti-corruption procedures to the corruption risk.

A set of measures aimed at preventing and suppressing corruption offences shall be developed and implemented in the Company taking into account the existing corruption risks in its activities.

7.1.5. The principle of effectiveness of anti-corruption procedures.

The Company shall apply such anti-corruption measures that have a low cost, provide ease of implementation and bring significant results.

7.1.6. The principle of responsibility and inevitability of punishment.

If employees of the Company commit corruption offences in connection with the performance of their job duties, they shall be held liable in accordance with the applicable laws, regardless of their position, work experience, or any other conditions. The Company's management shall be personally liable for implementing the internal Anti-Corruption Policy.

7.1.7. The principle of constant control and regular monitoring.

The Company shall regularly monitor the effectiveness of implemented anti-corruption measures and procedures, as well as control their implementation.

7.2. Scope of the Anti-Corruption Policy and Group of Persons that Fall within the Scope

7.2.1. The main group of persons who are subject to the Anti-Corruption Policy are the employees of the Company who have labour relations with it, regardless of their position and functions.

7.2.2. The requirements of this Anti-Corruption Policy shall also apply to the Company's contractors and other persons, in cases when the relevant obligations (requirements) are specified in the agreements (contracts) or directly follow from the laws.

7.3. The Company's Officials Responsible for Implementing the Anti-Corruption Policy

7.3.1. The Company's officials responsible for combating corruption, based on the functions assigned to them, shall be the Director General, Deputies Director General, and heads of Company's business units.

7.3.2. The Company's Director General shall:

- approve local regulations of the Company aimed at implementing measures to prevent corruption, as well as amendments and addenda thereto;
- monitor the overall progress of the implementation and application of the Anti-Corruption Policy and the effectiveness of the anti-corruption measures implemented;
- govern the Company's Committee for Monitoring the Compliance with the Requirements for the Company's Employee Conduct and Management of Conflict of Interests.

7.3.3. Deputies Director General shall:

- exercise general control over the implementation of the Anti-Corruption Policy by the subordinate business units;
- participate in the Company's Committee for Monitoring the Compliance with the Requirements for the Company's Employee Conduct and Management of Conflict of Interest;
- make proposals on amendments and/or addenda to the Anti-Corruption Policy;
- by order of the Company's Director General, participate in reviewing reports on cases of inducing employees to commit corruption offences for the benefit or on behalf of another organization, as well as in cases of corruption offences committed by the Company's employees, contractors or any other persons;
- by order of the Company's Director General, assist authorized representatives of control, supervisory and law enforcement agencies in conducting inspections of the Company's activities related to preventing and combating corruption;
- by order of the Company's Director General, assist authorized representatives of law enforcement agencies in carrying out measures to prevent or investigate corruption offences.

7.3.4. Managers of business units shall:

- monitor compliance with the Anti-Corruption Policy by their subordinate employees;
- make proposals on amendments and/or addenda to the Anti-Corruption Policy on their own initiative or on the initiative of their subordinate employees;
- by order of the Company's Director General, assist authorized representatives of control, supervisory and law enforcement agencies in conducting inspections of the Company's activities related to preventing and combating corruption;
- by order of the Company's Director General, assist authorized representatives of law enforcement agencies in monitoring during carrying out measures to prevent or investigate corruption offences.

7.3.5. The Company's business unit responsible for the development and implementing the Company's Anti-Corruption Policy, which is the Committee for Compliance with the Requirements for Employee Conduct and Management of Conflict of Interest, shall:

- arrange events aimed at implementing the principles and requirements of the Company's Anti-Corruption Policy;
- carry out activities to prevent, identify, review and suppress corrupt practices and/or conflicts of interest;
- coordinates the activities of the Company's business units in the implementation of the Company's Anti-Corruption Policy;
- interact with government authorities and local bodies in the field of anti-corruption measures;
- arrange events to form anti-corruption corporate consciousness;
- monitor Russian anti-corruption laws and monitor amendments made to the laws and regulations;

- develop the Company’s anti-corruption documents and initiate updating of the Company’s documents in connection with amendments made to the anti-corruption laws of the Russian Federation;
- perform other functions within its competence; and
- review issues related to the implementation of the provisions of the Code of Conduct, manage conflicts of interest, including those related to the identification of corrupt practices.

7.4. Duties of Employees Related to the Prevention and Combating Corruption

7.4.1. The employees of the Company shall:

- comply with the requirements of anti-corruption laws;
- refrain from committing and/or participating, directly or indirectly, personally or through the mediation of third parties in the commission of corruption offences for the benefit or on behalf of the organization, including to refrain from any conduct that may be perceived by others as a promise or offer of giving a bribe, or a consent to accept a bribe, or as a request (a hint) for a bribe, but combat any corrupt practices and any other abuses in the Company;
- refrain from any conduct that may be interpreted by others as a willingness to commit or participate in the commission of a corruption offence for the benefit or on behalf of the organization;
- immediately inform their direct manager (the Company’s management) about cases of inducement of him/her (an employee of the Company) to commit corruption offences;
- immediately inform their direct manager (management of the Company) about information that has become known to him/her (an employee of the Company) about cases of corruption offences committed by other employees and/or contractors of the organization or any other persons;
- inform their direct manager or another responsible person about the possibility of a conflict of interests that may arise or has arisen with him/her (an employee of the Company).

7.5. Company’s Cooperation with Law Enforcement Agencies

7.5.1. The Company’s cooperation with law enforcement agencies in combating corruption is one of the indicators of the Company’s real commitment to the declared anti-corruption standards of conduct.

7.5.2. The Company cooperates with law enforcement agencies in order to:

- identify persons suspected (accused) of committing corruption offences, their location, as well as the location of other persons involved in corruption offences;
- identify assets and/or services received as a result of committing corruption offences or serving as a means of committing them;
- exchange information on anti-corruption issues; and
- coordinate activities for prevention and combating corruption.

7.5.3. Cooperation in combating corruption can take the following forms:

- sending materials to the relevant law enforcement agencies about cases of corruption offences that have become known to the Company, for making a decision on the merits;
- assist authorized representatives of control, supervisory and law enforcement agencies in conducting inspections of the Company’s activities related to preventing and combating corruption.

7.6. Anti-Corruption Policy Directions

7.6.1. Anti-Corruption Assessment.

7.6.1.1. The Company shall define a unified procedure for conducting an anti-corruption assessment of the Company’s documents.

7.6.1.2. The Company’s business units shall, within their competence, conduct an anti-corruption assessment of the Company’s documents.

7.6.1.3. The Company’s business unit responsible for the development and implementation of the Company’s Anti-Corruption Policy shall provide methodological assistance in the implementation of the Company’s anti-corruption assessment.

7.6.2. Anti-Corruption Monitoring.

7.6.2.1. Anti-corruption monitoring in the Company includes monitoring of anti-corruption measures and activities carried out as part of the implementation of the Company's Anti-Corruption Policy, as well as of revealed facts of corruption and ways to eliminate them.

7.6.2.2. The main areas of anti-corruption monitoring are as follows:

- synthesis and analysis of the results of the anti-corruption assessment of the Company's documents;
- study of opinions of the employees on the state of corruption in the Company and the efficiency of anti-corruption measures taken;
- analysis of the implementation of anti-corruption measures specified in the Company's regulatory and administrative documents;
- study and analysis of statistical reports on corruption cases revealed in the Company, assessment and forecast of corruption factors and signals;
- analysis of complaints and statements made by individuals and legal entities concerning corrupt practices in the Company;
- study and analysis of measures taken in the Company to combat corruption;
- analysis of publications about the corruption in the Company in the mass media, etc.

7.6.3. Reviewing and Considering Information Regarding the Alleged Corruption.

7.6.3.1. The Company declares openness in combating corruption.

7.6.3.2. The Company resolves conflicts/situations based on the complaints of the Company's employees, contractors and any other persons (individuals and legal entities) concerning corruption.

7.6.3.3. The Company receives complaints about the facts of corruption also by holding personal meetings.

7.6.3.4. The Company creates an efficient system for reviewing and resolving complaints about the facts of corruption in the Company.

7.6.3.5. The Company creates a set of efficient measures to verify information on the alleged corruption, and if such information is confirmed, to eliminate (minimize) its consequences and the causes that contribute to them.

7.6.4. Managing the Conflict of Interests.

7.6.4.1. The Company declares that it shall take measures to comply with the norms of the corporate ethics (outlined in the Code of Conduct), standards of corporate conduct and conflict of interests management.

7.6.4.2. The Company has established and operates the Committee to Monitor the Compliance with the Requirements for Employee Conduct and Management of Conflict of Interests (the "Committee").

7.6.4.3. The main objectives of the Committee are as follows:

- ensure compliance by employees with the Russian laws on combating corruption, Code of Conduct and/or requirements for the prevention and management of the conflict of interests ("requirements for corporate conduct and/or requirements for management of the conflict of interests");
- implement measures for preventing corruption in the Company.

7.6.4.4. The Committee shall consider issues related to compliance with the requirements for corporate conduct and/or requirements for management of the conflict of interests in respect of the Company's employees.

7.6.4.5. The members of the Committee shall be appointed by the order of the Company's Director General.

7.6.4.6. All members of the Committee shall have equal rights when making decisions. In the absence of the Chairman of the Committee, his/her duties shall be performed by the Deputy Chairman of the Committee.

7.6.4.7. The Committee shall be established in such a way as to exclude the possibility of a conflict of interests that could affect decisions made by the Committee.

7.6.4.8. A meeting of the Committee shall be deemed to have a quorum if it is attended by at least two-thirds of the total number of the Committee members.

7.6.4.9. If there is a direct or indirect personal interest of a member of the Committee, which may lead to a conflict of interests when considering an issue included in the agenda of the Committee Meeting, he/she shall declare this before the start of the meeting. In this case, such member of the Committee shall not participate in the consideration of such issue.

7.6.4.10. The following persons may participate in the meetings of the Committee with the right to a deliberative vote:

- direct manager of an employee in respect of whom the Committee considers compliance with the requirements for corporate conduct and/or requirements for management of the conflict of interests;
- other employees of the Company who are able to comment on the matters considered by the Committee; representatives of the concerned organisations; a representative of the employee in respect of whom the Committee considers compliance with the requirements for corporate conduct and/or requirements for management of the conflict of interests, by the decision of the Chairman of the Committee which he/she shall adopt on a case by case basis at least 2 business days before the date of the Committee Meeting at the request of the employee in respect of whom the Committee considers the relevant issue or any member of the Committee.

7.6.4.11. The ground for holding a Committee Meeting:

- shall be the submission by the Company's Director General of materials indicating that an employee does not comply with the requirements for corporate conduct and/or requirements for management of the conflict of interests;

7.6.4.12. The Committee shall not consider any reports of crimes and/or administrative offences, as well as any anonymous appeals, and shall not check disciplinary violations.

7.6.4.13. Upon receipt of the information containing the grounds for holding a Committee Meeting, the Chairman of the Committee shall:

- appoint the date of the Committee Meeting within 3 days. However, the Committee Meeting may not be appointed on a date later than seven days from the receipt of the specified information;
- ensure that the employee in respect of whom the Committee considers compliance with the requirements for corporate conduct and/or requirements for management of the conflict of interests, his/her representative, members of the Committee and any other persons participating in the Committee Meeting are informed of the received information and results of its review;
- review motions of the employee in respect of whom the Committee considers the relevant issue or of any member of the Committee on inviting persons specified in subparagraph b), paragraph

7.6.4.10 of this Anti-Corruption Policy to the Committee Meeting and adopt a decision on upholding (refusing to uphold) such motions and considering (refusing to consider) any additional materials during the Committee Meeting.

7.6.4.14. The Committee Meeting shall be held in the presence of the employee in respect of whom the Committee considers compliance with the requirements for corporate conduct and/or requirements for management of the conflict of interests. If the employee submits a written request to consider the specified issue without him/her, the Committee Meeting shall be held in his/her absence. If the employee or his/her representative fails to appear at the Committee Meeting and there is no employee's written request to consider the specified issue without him/her, the consideration of the issue shall be adjourned. If the above-mentioned persons fail to appear at the Meeting without a good reason for the second time, the Committee may decide the issue in the absence of the employee.

7.6.4.15. At the Meeting, the Committee shall hear explanations of the employee (with his/her consent) and any other persons and consider the materials on the merits of the matters put before this Committee Meeting, as well as any additional materials.

7.6.4.16. The members of the Committee and the participants of the Meeting may not disclose information that has become known to them during the Committee's work.

7.6.4.17. Based on the results of considering the issues specified in subparagraph a) of paragraph 7.6.4.11 of this Anti-Corruption Policy, the Committee shall adopt one of the following decisions:

- establish that the employee has complied with the requirements for corporate conduct and/or requirements for management of the conflict of interests;

- establish that the employee has not complied with the requirements for corporate conduct and/or requirements for management of the conflict of interests. In this case, the Committee shall point out to the employee that it is unacceptable to violate the requirements for corporate conduct and/or requirements for management of the conflict of interests and expose the employee's action (omission) to moral condemnation. The Committee may also decide whether it is possible to eliminate the causes, conditions and consequences of the violations.

7.6.4.18. Based on the results of considering the issues specified in subparagraph b) of paragraph 7.6.4.11 of this Anti-Corruption Policy, the Committee shall adopt a relevant decision. The Committee may develop measures to identify and eliminate the causes and conditions that contribute to the occurrence of a conflict of interests in the Company.

7.6.4.19. The Committee shall adopt its decisions by open voting (unless the Committee decides otherwise) by a simple majority of votes of the Committee's members present at the meeting.

7.6.4.20. The decisions adopted by the Committee shall be executed in the form of the minutes which shall be signed by the Committee's members who have participated in its meeting.

7.6.4.21. The following shall be specified in the minutes of the Committee Meeting:

- a) date of the Committee Meeting, full names of the Committee's members present at the Meeting;
- b) wording of each of the issues considered at the Committee Meeting, indicating the full name and position of the employee in respect of whom the issue of compliance with the requirements for corporate conduct and/or requirements for management of the conflict of interests is being considered;
- c) claims made to the employee and materials on which they are based;
- d) gist of the explanations of the employee and any other persons on the merits of the claims;
- e) full names of the persons who spoke at the meeting and summary of their statements;
- f) source of information containing the grounds for holding the Committee Meeting, the date of receipt of the information by the Company;
- g) any other information;
- h) voting results;
- i) decision and justification for its adoption.

7.6.4.22. A member of the Committee who does not agree with the adopted decision shall have the right to express his/her opinion in writing, and such opinion must be enclosed to the minutes of the Committee Meeting, which the employee shall have read.

7.6.4.23. Copies of the minutes of the Committee Meeting shall be sent to the Director General, to the employee, either in full or in the form of extracts from it, and, by the decision of the Committee, to any other stakeholders.

7.6.4.24. The Company's Director General shall review the minutes of the Committee Meeting and have the right to take into account the recommendations contained therein, within the limits of his/her competence, when making a decision on applying sanctions to the employee provided for in the laws and regulations of the Russian Federation, as well as in respect of any other issues related to countering corruption.

7.6.4.25. If the Committee establishes signs of disciplinary misconduct in the actions (omission) of the employee, this shall be reported to the Company's Director General to decide upon applying sanction to the employee provided for in the laws and regulations of the Russian Federation.

7.6.4.26. If the Committee establishes that the employee has committed an action (omission) that contains signs of an administrative offence or a crime, the Chairman of the Committee shall report information about the commission of the said action (omission) and transfer evidencing documents to the law enforcement agencies.

7.6.4.27. A copy of the minutes of the Committee Meeting or an extract from it shall be attached to the personal file of the employee in respect of whom the issue of compliance with the requirements for corporate conduct and/or requirements for management of the conflict of interests has been considered.

7.6.4.28. An employee of the Company who is in charge of HR management shall be responsible for organizational and document support of the Committee's Meetings, informing the members of the Committee about the issues included in the agenda, date, time and place of the meeting, and providing an opportunity for the members of the Committee to review the materials submitted for discussion at the Committee Meeting.

7.6.5. Interaction with Contractors.

7.6.5.1. The Company seeks to have business relations with contractors who support the Company's Anti-Corruption Policy and contractors who declare their non-acceptance of corruption.

7.6.5.2. The Company declares that it refuses to encourage employees of the contractors in any way, including by providing money, gifts, performing work (providing services) to them free of charge, or in any other way not mentioned here, that makes the contractor's employee dependent and is aimed at ensuring that this employee performs certain actions for the benefit of the Company.

7.6.5.3. The Company declares transparent financial activities with its contractors.

7.6.6. Participation in Charity and Sponsorship.

7.6.6.1. The Company shall not, directly or through its employees, finance any charitable or sponsorship projects in order to obtain or maintain an advantage in commercial activities.

7.6.7. Payments Made through Intermediaries or to Third Parties.

7.6.7.1. The Company and its employees shall not be allowed to engage or use intermediaries or any other persons to perform any actions that contradict the principles and requirements of the Company's Anti-Corruption Policy or the applicable anti-corruption laws.

7.6.7.2. The Company shall maintain procedures for checking intermediaries and any other persons to prevent and/or detect violations described above in order to minimise and prevent the risks of the Company's involvement in the corruption activities.

7.6.8. Disclosure of Financial Transactions, Audit, and Control.

7.6.8.1. All financial transactions shall be accurately, correctly and with sufficient details disclosed in the Company's accounting records, displayed in the documents and available for verification.

7.6.8.2. The Company's employees shall be responsible for preparing and providing complete and reliable financial statements within the time limits established by the applicable laws in accordance with their official duties.

7.6.8.3. Misrepresentation or falsification of the Company's financial statements shall be strictly prohibited.

7.6.8.4. The Company shall regularly conduct internal control and external audits of its financial and economic activities and control the completeness and correctness of the data reflected in the accounting records and compliance with the requirements of the applicable laws and internal regulatory documents of the Company, including the principles and requirements established by this Anti-Corruption Policy.

7.6.9. Awareness Raising Activities.

7.6.9.1. On its website on the Internet, the Company shall publish information about the documents adopted by the Company which are aimed at countering corruption and about measures taken by the Company to combat and prevent corruption, raise legal awareness and form the basis for law-abiding conduct of the Company's employees.

7.6.9.2. The Company shall hold an induction briefing on the provisions of the Company's Anti-Corruption Policy and related documents for all newly hired employees of the Company.

7.6.9.3. Each hired employee gets acquainted with the provisions of the Anti-Corruption Policy on the first working day and confirms in writing that he/she is familiar with this Local Regulatory Act of the Company.

7.6.9.4. In case of arising the questions related to the official behavior and controversial cases of conflict of interest, any employee has the right to ask for clarifications from the members of the Commission on compliance with the requirements for official conduct of employees and the settlement of conflicts of interest to the Company's management or to the HR department.

7.6.9.5. The Company shall conduct awareness-raising activities related to prevention of corruption offences and changes in the applicable anti-corruption laws of the Russian Federation.

7.7. Exchange of Business Gifts and Business Entertainment

7.7.1. The Company acknowledges that exchange of business gifts and entertainment, including business hospitality, is a necessary part of doing business and is a generally accepted business practice. The Company encourages an atmosphere of honesty and transparency regarding business gifts and entertainment expenses.

7.7.2. At the same time, the Company considers this area vulnerable to the risk of involvement in corruption activities, therefore, gifts and entertainment that employees may, on behalf of the Company, provide to other persons and organisations or may receive from other persons and organisations in connection with their activities in the Company (performance of official (job) duties) shall meet the set of criteria listed below:

- shall be directly related to the legitimate goals of the Company's business, such as presentation or completion of projects, the successful holding of events, performance of contracts, or generally accepted holidays such as Christmas, New Year, International Women's Day, as well as memorable dates and anniversaries;
- shall be reasonably justified;
- the cost of the gifts shall not exceed 3,000 Roubles;
- shall not represent a hidden reward for a service, action, omission, connivance, patronage, granting of rights, making a certain decision, etc., or an attempt to influence the recipient for any other illegal or unethical purpose;
- shall not create a reputation risk for the Company, employees and any other persons in case of disclosure of the information about the gifts;
- shall not contradict the principles and requirements of the Anti-Corruption Policy, other local regulations of the Company and the applicable anti-corruption laws.

7.7.3. If the gifts and/or entertainment that employees may receive or have received from other organisations in connection with their activities in the Company in aggregate do not meet the above criteria, employees shall, no later than within 3 business days after the receipt of the gift, send a notice of receipt of the gift in connection with their official position or performance of their official (job) duties (the "Notice") to the authorised business unit of the Company (Committee for Compliance with the Requirements for the Company's Employee Conduct and Management of Conflict of Interests). If a gift has been received during a business trip, the Notice shall be submitted no later than within 3 business days after the person who has received the gift has returned from the business trip. If it is not possible to submit the Notice within the time limits specified in paragraphs one and two of this item, for a reason beyond the control of the employee, it shall be submitted no later than the next day after the elimination of such reason.

7.7.4. The Notice shall be made in two copies, one of which shall be returned to the person who has submitted the Notice with a note of registration and the second copy shall be sent to the Committee for Compliance with the Requirements for the Company's Employee Conduct and Management of Conflict of Interests (the "Committee").

7.7.5. A gift which costs more than 3,000 Roubles or the price of which is unknown to its recipient shall be handed over to the responsible person of the authorised business unit for safe custody against the Acceptance Certificate no later than within 5 business days from the registration date of the Notice in the relevant registry.

7.7.6. In order to enter the gift into the books in the manner established by the laws of the Russian Federation, its price shall be determined based on the market price in effect on the date of recognition of the gift, or the price of a similar item under comparable conditions with the involvement of the Committee, if necessary. The information about the market price shall be proved by relevant documents and, where impossible, by expertise. If the price of the gift does not exceed 3,000 Roubles, it shall be returned to the person who has handed it over against the Acceptance Certificate.

7.7.7. The employee who has handed over the gift may buy it out by sending a relevant application to the Director General no later than within two months from the date when the gift has been handed over.

7.7.8. The gift which has not been requested by the employee for buying out may be used by the Company provided that the Committee has confirmed that it is appropriate to use the gift for the purpose of supporting the Company's activities.

7.7.9. If it is not appropriate to use the gift, it shall be decided to sell the gift and assess its value for sale (buy out).

7.7.10. The funds received from the sale (buy out) of the gift shall be the Company's income.

7.8. Liability of the Company's Employees for Non-compliance with the Requirements of the Anti-Corruption Policy

7.8.1. All employees of the Company, regardless of their position, shall be personally liable for the compliance with the principles and requirements of the Anti-Corruption Policy.

7.8.2. If the Company's employees commit any corruption offences in connection with the performance of their job duties, the disciplinary, administrative or criminal action may be brought to against them on the initiative of the Company's Director General, law enforcement agencies or any other persons in the manner and on the grounds provided for in the applicable laws of the Russian Federation.

8. Circulation

8.1 It is necessary to acquaint all employees of the Company with this document.

9. Approval Page

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