

ANTI-CORRUPTION POLICY
of SRDI O&G “Peton” LLC
ПЛЮ 06-03-2018

Foreword

- 1 DEVELOPED BY IS&PD
- 2 THE POLICY ENACTED BY Order No. 264-Y06 dated 25 December 2018
- 3 This POLICY has been developed by reference to the provisions of Federal Law No. 273-FZ dated 25 December 2008 “On Countering Corruption” and Guidelines for Development and Adoption of Measures to Prevent and Counter Corruption
- 4 FIRST ISSUE

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1 Scope

1.1. This Anti-Corruption Policy (hereinafter – the Policy) defines the business entity’s anti-corruption policy and represents a bylaw of SRDI O&G “Peton” LLC (hereinafter – the Company) intended to prevent and suppress corruption offences in the business entity’s activities.

1.2. The basic list of persons falling within the scope of the Anti-Corruption Policy comprises the Company employees irrespective of their position and functions.

1.3. The provisions hereof apply to the other individuals and/or legal entities entering into contractual relations with the Company and shall be enshrined in the contracts made by the Company with such persons.

2 Normative References

This Policy contains references to the following regulations:

Federal Law No. 273-FZ dated 25 December 2008 “On Countering Corruption”;

Federal Law No. 402-FZ dated 6 December 2011 “On Accounting”;

Guidelines for Development and Adoption of Measures to Prevent and Counter Corruption (approved by the Ministry for Labour and Social Protection of the Russian Federation on 8 November 2013)

3 Terms and Definitions

The following terms with the relevant definitions shall be used herein:

Corruption means abuse of position, bribe giving, bribe taking, abuse of authority, trading in influence, or any other illegal use by an individual of its official position in disregard of the legitimate interests of the public and state in order to gain benefit in the form of money, valuables, any other property or monetizable services, any other property rights, whether for himself / herself or for any third party, or any illegal provision of such individual with such benefit by any other individuals. In addition, corruption includes commitment of the acts listed above on behalf or for the benefit of a legal entity (Clause 1, Article 1 of Federal Law No. 273-FZ dated 25 December 2008 “On Countering Corruption”);

Countering corruption means efforts by federal government authorities, government authorities of the constituent entities of the Russian Federation, local government authorities, civil society institutions, non-governmental entities, and individuals within the scope of their authority to (Clause 2, Article 1 of Federal Law No. 273-FZ dated 25 December 2008 “On Countering Corruption”):

- Prevent corruption, in particular, by identifying and ultimately eliminating the causes of corruption (preventing corruption);
- Detect, prevent, suppress, uncover, and investigate corruption offences (combatting corruption);
- Minimise and/or eliminate the consequences of corruption offences.

Counterparty means any Russian or foreign legal entity or individual entering into contractual relations with the business entity, except for employment relations;

Bribe means receipt by an official, a foreign official, or an official of a public international organisation, whether in person or through an intermediary, of money, securities, other property, or in the form of illegal provision thereof with monetizable services or any other proprietary rights in exchange for actions (omissions) for the benefit of the bribe-giver or any persons represented thereby whenever such actions (omissions) fall within the official's powers or if he/she is in the position to use his/her official position in order to facilitate such actions (omissions), as well as for general patronage or connivance in the service.

Trading in influence means illegal provision of an executive officer of a business or any other entity with money, securities, any other assets, monetizable services, any other rights in exchange for actions (omissions) for the benefit of the giver by virtue of this person's office (Part 1, Article 204 of the Criminal Code of the Russian Federation);

Conflict of interest means a situation when an employee's (business entity representative's) self-interest (whether direct or indirect) influences or may potentially influence proper performance of his/her job (employment) duties and gives rise or may potentially give rise to a conflict between the employee's (business entity representative's) self-interest and the business entity's rights and legitimate interests capable of harming the rights and legitimate interests, assets, and/or business reputation of the business entity employing (represented by) this person.

Employee's (business entity representative's) self-interest means employee's (business entity representative's) interest associated with the employee's (business entity representative's) opportunity to receive income in the form of money, valuables, any other property or monetizable services, any other property rights, whether for himself / herself or for any third party, while performing his/her job or other duties;

Corruption offence means an act bearing the marks of corruption subject to civil, disciplinary, administrative, or criminal liability under a law or regulation;

Factor conducive to corruption means a phenomenon or combination of phenomena giving rise to corruption offences or conducive to propagation thereof;

Preventing corruption means efforts by the Company's under the Anti-Corruption Policy intended to identify, examine, limit, or eliminate any phenomena giving rise to corruption offences or conducive to propagation thereof.

4 General Provisions

4.1. The primary goals of the Anti-Corruption Policy in the Company are as follows:

- Minimising the risk that the business entity, its management, and employees will engage in corrupt practices;
- Building a uniform understanding of the Company's Policy as it regards zero tolerance for corruption in all forms and manifestations with the business entity employees (regardless of their position), counterparties, and any other persons;
- Summarising and clarifying the basic requirements of the Russian Federation laws in the area of countering corruption applicable in the Company.

4.2. To accomplish these goals, the Company has set the following objectives for the Anti-Corruption Policy:

- Entrenching the Company's anti-corruption concepts;
- Defining the scope of the Policy and range of persons subject thereto;
- Naming the Company officers responsible for the implementation of the Anti-Corruption

Policy;

- Defining the responsibilities in the area of preventing and countering corruption and assigning them to Company employees;
- Making the list of anti-corruption activities, standards, and procedures implemented by the Company and their implementation (application) procedures;
- Allocating Company employees' liability for failure to comply with the requirements of the Anti-Corruption Policy.

5 Company's Anti-Corruption Concepts

5.1. Pursuant to Article 3 of Federal Law No. 273-FZ dated 25 December 2008 "On Countering Corruption", the efforts to counter corruption in the Russian Federation are based on the following concepts:

- Recognition, enforcement, and protection of fundamental human and civil rights and freedoms;
- Legality;
- Openness and transparency of the Company's core business, in particular, in relations with federal and local government authorities;
- Inevitability of punishment for corruption offences;
- Comprehensive use of organisational, information socio-economic, legal, special, and other measures;
- Priority of corruption prevention measures;
- Cooperation with state and civil society institutions, international organisations, and individuals on the part of the Company.

5.2. The system of measures to counter corruption in the Company is based on the following principles:

- Compliance of the Company's Anti-Corruption Policy with the current laws and generally accepted rules: compliance of the anti-corruption activities with the Constitution of the Russian Federation, international treaties of the Russian Federation, Federal Law No. 273-FZ dated 25 December 2008 "On Countering Corruption", and other laws and regulations applicable to the Company;
- Tone at the top of the Company: the Company's top management is supposed to develop the ethical standard of zero tolerance for corruption in all forms and manifestations at all levels leading by example;
- Involvement of employees: Company employees' proactive involvement in the development and implementation of anti-corruption standards and procedures irrespective of their position;
- Zero tolerance: zero tolerance by the Company for corruption in all forms and manifestations;
- Proportionality of anti-corruption procedures to the risk of corruption: development and implementation of a set of measures intended to reduce the likelihood that the Company, its managers, and employees will engage in corrupt practices with due regard for the relevant risk exposure;
- Regular risk assessment: the Company identifies and assesses the corruption risks inherent in the activities of the Company as a whole and of its individual divisions in particular on a regular basis;
- Mandatory check of counterparties: the Company will check counterparties on an ongoing basis for their tolerance for corruption, in particular, by checking whether they have their own anti-corruption activities or policy, are willing to comply with the requirements hereof, incorporate anti-corruption

provisions (clauses) in contracts, and provide mutual assistance to enforce ethical business practices and prevent corruption;

- Business openness: notification of counterparties, partners, and the public on the anti-corruption business standards adopted by the Company.
- Continuous control and ongoing monitoring: ongoing efficiency monitoring and follow-up control of the anti-corruption standards and procedures in place;
- Responsibility and inevitability of punishment: inevitability of punishment for the employees, regardless of their position, length of service, and any other circumstances, committing corruption offences in connection with the exercise of their employment duties, as well as Company key executives' personal responsibility for the implementation of the corporate anti-corruption policy.
- No retaliation and sanctions: The Company declares that no sanctions (including dismissal, demotion, forfeiture of a bonus) shall be imposed on any Employee who reports a suspected instance of corruption or refuses to give or take a bribe, trade in influence, or mediate in bribery, including the instances when such refusal results in lost profits for the Company or its failure to obtain business and competitive advantages.

6 Company Officers Responsible for the Implementation of the Anti-Corruption Policy

6.1. The General Director of the Company is responsible for the management of all activities intended to counter corruption in the Company.

6.2. Based on the relevant objectives, specific nature, staff strength, and organisational set-up of the Company, its General Director shall appoint the division (officer) responsible for the implementation of the Anti-Corruption Policy.

6.3. Key duties of the officers responsible for the implementation of the Anti-Corruption Policy:

- Preparing recommendations for the purpose of decision-making on countering corruption in the Company;
- Preparing proposals intended to eliminate the causes and conditions giving rise to the corruption risk in the Company;
- Drafting bylaws intended to implement corruption prevention measures and bringing them before the General Director for approval;
- Implementing control activities to detect corruption offences committed by Company employees;
- Administering corruption risk assessments;
- Receiving and reviewing reports on instances of inducing employees to commit corruption offences for the benefit or on behalf of another entity and instances of corruption offences committed by Company employees, Company counterparties, or any other parties;
- Organising completion and review of conflict-of-interest declarations;
- Organising training activities and individual consulting sessions on matters of preventing and countering corruption for employees;
- Providing authorised representatives of oversight and law-enforcement agencies with assistance during the inspection audits of the Company's activities on matters of preventing and

countering corruption;

- Assisting the authorised representatives of law-enforcement agencies with activities intended to suppress or investigate corruption-related crimes, including investigative activities;
- Arranging activities intended to prevent and counter corruption;
- Organising individual consulting sessions for employees;
- Contributing to the management of anti-corruption propaganda;
- Evaluating the Company’s anti-corruption performance and preparing the relevant records for the General Director of the Company.

7 Company Employees’ Duties to Prevent and Counter Corruption

7.1. In connection with their job duties, all employees shall (regardless of their position and length of service with the Company):

- Be guided hereby and observe the principles and requirements hereof at all times.
- Abstain from commitment of and/or involvement in corruption offences for the benefit or on behalf of the Company;
- Abstain from any conduct that may be interpreted by the public as willingness to commit or be involved in a corruption offence for the benefit or on behalf of the Company;
- Report any instances of inducing an employee to commit corruption offences to the immediate superior / officer responsible for the implementation of the anti-corruption policy / management of the Company promptly;
- Report any instances of corruption offences committed by other employees, Company counterparties, or any other parties that come to the employee’s notice to the immediate superior / officer responsible for the implementation of the anti-corruption policy / management of the Company promptly;
- Report any potential or actual conflict of interest involving the employee to the immediate superior or any other responsible officer.

8 Anti-Corruption Activities Implemented by the Company

Area	Activity
Regulatory support, entrenchment of the standards of conduct, and declaration of intent	Developing, adopting, and amending the Company’s the Anti-Corruption Policy
	Incorporating a standard anti-corruption clause in the Company’s business contracts
	Incorporating anti-corruption provisions in employees’ employment contracts
Development and introduction of special anti-corruption procedures	Introducing the procedure for the employees to report any instances of inducing employees to commit corruption offences to the employer and procedure for reviewing such reports, in particular, by creating convenient channels for reporting this information (feedback mechanisms, hotline, etc.)

	Introducing the procedures for employees to report the information on any corruption offences committed by other employees, entity counterparties, or other parties that comes to their notice to the employer and procedure for reviewing such reports, in particular, by creating convenient channels for reporting this information (feedback mechanisms, hotline, etc.)
	Introducing the procedure for employees to report any conflict of interest to the employer and procedure for resolving the conflict of interest revealed
	Introducing the procedures for protecting the employees reporting corruption offences in the business entity's activities against formal and informal sanctions
	The responsibility to arrange the anti-corruption procedures referred to above shall be assigned to the IS&PD
	Conducting a regular assessment of corruption risks in order to identify the business entity's business areas most vulnerable to those risks and develop the relevant anti-corruption measures
Training and notification of employees	Making the employees aware of the regulatory documents governing the matters of preventing and countering corruption in the business entity
	Organising training activities on matters of preventing and countering corruption
	Organising individual consulting sessions for employees on matters concerning the application of (compliance with) anti-corruption standards and procedures
Assurance of compliance of the business entity's internal control and audit system with the requirements of the business entity's anti-corruption policy	Implementing ongoing monitoring of compliance with internal procedures
	Implementing ongoing monitoring of accounting data, availability and validity of primary accounting documents
	Implementing ongoing monitoring of economic feasibility of expenses in the areas characterised by high exposure to corruption risk: exchange of business gifts, representation expenses, charitable donations, external advisers' fees
Involvement of experts	Conducting external audit on a regular basis
	Involving external independent experts for the Company's business activities and organising anti-corruption measures
Evaluation of anti-corruption performance and distribution of records	Conducting an ongoing evaluation of the efforts to counter corruption
	Preparing and distributing the relevant records on performance and deliverables in the area of countering corruption

9 Introducing the Standards of Conduct for Company Employees

9.1. In order to introduce anti-corruption standards of conduct for employees, the Company shall establish general rules and principles of employee conduct touching upon business ethics and intended for Company employees to develop ethical and honest conduct in general as they are enshrined in the Code of Ethics and Business Conduct for Employees.

10 Identifying and Resolving the Conflict of Interest

10.1. Timely identification of the conflict of interest in Company employees' activities is a crucial element of the efforts to prevent corruption offences.

10.2. A Company employee must take measures to prevent any possibility of a conflict of interest whatsoever; A Company employee must report an existing conflict of interest or a potential conflict of interest (as soon as the employee becomes aware thereof) to the hirer / employer representative in writing.

10.3. In case of becoming aware of a Company employee's self-interest that gives rise or may potentially give rise to a conflict of interest, the hirer / employer representative shall take measures to prevent or resolve such conflict.

10.4. A conflict of interest shall be prevented and resolved by employee disqualification or self-disqualification when and as provided for by the laws, alteration of the employment status or job title up to suspension without pay, and/or waiver of the benefit giving rise to the conflict of interest by the Company employee.

10.5. In case of failure to take measures to prevent and resolve a conflict of interest, the following types of disciplinary sanctions may be imposed on Company employees:

- Dismissal due to loss of confidence;
- Reprimand;
- Warning.

The type of disciplinary sanctions to be imposed on the Company employee shall be selected minding the nature of the corruption offence committed thereby, its severity, and circumstances associated therewith, compliance by the employee with the other restrictions and bans, requirements to prevent or resolve the conflict of interest, and performance thereby of the duties assigned to counter corruption, along with the Company employee's previous performance in discharge of his/her job duties.

11 Rules for Exchanging Business Gifts and Business Hospitality

11.1. The gifts that Company employees may give on the business entity's behalf to other individuals and entities or receive from other individuals and entities in connection with their work, along with representation expenses, including business hospitality and Company promotion expenses, are supposed to meet all the criteria below at the same time:

- They shall be directly associated with the Company's legitimate purposes, e.g., with presentation or completion of business projects, successful performance of contracts, or with the commonly accepted holidays and memorable dates (e.g., the New Year, International Women's Day (8 March), Defender of the Fatherland Day (23 February), birthday of the counterparty's contact person, etc.);

- They shall be reasonably justified, proportionate and shall not qualify as luxury items;
- The expenses shall be approved by the General Director of the Company;

- They shall not serve as a concealed payment for a service, action, omission, connivance, patronage, authorisation, certain decision regarding a transaction, agreement, permit, etc., or attempt to influence the taker for any other kind of illegitimate or unethical purpose;
- They shall not give rise to reputational risks for the Company, employees, or any other parties in the event the information concerning gifts and representation expenses is disclosed;
- They shall not be in conflict with the principles and requirements of this Policy, other bylaws of the Company, and applicable statutory provisions.

12 Assessing Corruption Risks

12.1. The purpose of corruption risk assessment is to identify the specific business processes and business operations in the Company's activities characterised by the highest likelihood of corruption offences by Company employees, whether for the sake of personal benefit or for the sake of benefit for the Company.

12.2. Corruption risk assessment is an essential element of the Anti-Corruption Policy. It makes it possible to ensure conformity of the anti-corruption measures implemented by the Company to its specific nature and reasonable application of the resources allocated to corruption prevention.

12.3. The Company shall assess corruption risks on an ongoing basis.

12.4. Corruption risk assessment procedure:

- Conceptualising the Company's activities as a set of separate business processes, breaking down each of these processes into components (sub-processes);

- Identifying the critical points for each business process, establishing the components (sub-processes) that involve the highest risk of corruption offences.

12.4.1 Making a description of potential corruption offences for each sub-process associated with the corruption risk. In particular, such description shall include:

- Outline of the benefit or advantage that may be secured by the Company or its individual employees by means of the corruption offence;
- Positions in the Company crucial for commitment of the corruption offence;
- Company officers to be involved in order to enable the corruption offence;
- Likely methods of corrupt payments.

12.4.2 Making a list of positions with a high corruption risk exposure. Special anti-corruption procedures and requirements may be established for the Company employees in these positions.

12.4.3 Developing a package of measures to rule out or minimise corruption risks. Depending on the peculiarities of a specific business process, the list of such measures may include:

- Re-engineering the functions, in particular, by reallocating them among the divisions within the Company;
- Introducing or expanding the procedural forms of interface for Company employees (with the representatives of counterparties, government authorities, etc.), for instance, using information technologies as the first-choice tool for such interface;
- Introducing restrictions to complicate corrupt payments, etc.

13 Consulting and Training Company Employees

13.1. The training on matters of preventing and countering corruption for Company employees

should be designed minding the goals and objectives of training, categories of trainees, and type of training in terms of timing.

13.2. The goals and objectives of training will shape the subjects and modalities of the sessions. Specifically, the subjects of the training sessions may be as follows:

- Corruption in the public and private economic sectors;
- Legal liability for corruption offences;
- Review of legal requirements and Company bylaws on matters of countering corruption and application thereof in the Company’s activities;
- Identification and resolution of the conflict of interest during performance of employment duties;
- Appropriate conduct in situations involving corruption risk, in particular, in case of bribe solicitation by the officials of federal government, local government, and other entities;
- Interface with law-enforcement agencies on matters of preventing and countering corruption.

13.3. The training should be designed minding the category of trainees. Trainees are normally divided into the following groups:

- Officers responsible for countering corruption in the Company;
- Company executives;
- Other Company employees.

13.4. Depending on the timing, training may be divided into the following types:

- Training on matters of preventing and countering corruption upon recruitment;
- Training upon promotion of the Company employee to a more senior position providing for the duties to prevent and counter corruption;
- Regular training of Company employees in order to maintain their knowledge and skills in the area of countering corruption at an appropriate level;
- Additional training in case of failures with the implementation of the Anti-Corruption Policy, inter alia, due to insufficiency of Company employees’ knowledge and skills in the area of countering corruption;
- Consulting on matters of countering corruption shall be provided case by case. To that end, the Company will appoint the persons responsible for the provision of consulting. It is advisable to provide consulting on individual matters of countering corruption and resolving the conflict of interest in confidence.

14 Internal Control and Audit

14.1. Federal Law No. 402-FZ dated 6 December 2011 “On Accounting” puts all entities under an obligation to subject business operations to internal control.

14.2. The Company’s internal control system contributes to prevention and detection of corruption offences in the business entity’s activities. At that, the internal control and audit system objectives of most interest are as follows: ensuring the reliability and validity of financial (accounting) statements; ensuring compliance of the Company’s activities with the requirements of the laws, regulations, and business entity’s bylaws, as well as:

- Checking compliance with diverse organisational and operating procedures and rules significant in terms of preventing corruption.
- Monitoring the documentation of the Company’s business operations;



- Checking the economic viability of the Company's operations in the areas of corruption risk.

14.3. The efforts to monitor the documentation of the Company's business operations are primarily associated with the Company's duty to maintain financial (accounting) records and are intended to prevent and detect the relevant offences: preparation of off-the-record statements, use of forged documents, recording of non-existent expenses, unavailability of primary accounting documents, corrections in documents and statements, destruction of documents and statements before the due date, etc.

14.4. Economic viability of operations in the areas of corruption risk shall be checked as it regards the exchange of business gifts, representation expenses, charitable donations, external advisers' fees, etc. In this case, it is necessary to pay attention at the presence of indicators of misconduct, e.g.:

- Payment for unidentified or suspicious services;
- Provision of expensive gifts, payment for transportation and entertainment services, issue of preferential loans, provision of other valuables or rewards to external advisers, federal or local government officials, affiliates' and counterparties' employees;
- Payment of a fee to an agent or external adviser in excess of the regular fee for the Company or fee for the relevant type of services;
- Procurement or sale at prices significantly different from market prices;
- Suspicious cash payments.

15 Measures to Prevent Corruption in Company's Relations with Corporate Counterparties and in Affiliates

15.1. The Company's anti-corruption efforts in relations with counterparties may be subdivided into two areas. The first area provides for establishing and maintaining business relations with the entities that stick to scrupulous and honest practices in business relations, take care of their own reputation, demonstrate strong commitment to high ethical standards of doing business, implement their own measures to counter corruption, and take part in joint anti-corruption initiatives. In this case, the Company will implement special counterparty check procedures in order to mitigate the risk that the Company will engage in corrupt and other dishonest practices in relations with its counterparties. Along with the other options, this check may provide for collecting and analysing open data on potential corporate counterparties: their reputation with the business communities, length of experience in the market, involvement in corruption scandals, etc. During the check of corruption risks in relations with counterparties, special attention shall be given to mergers and acquisitions.

The second area of anti-corruption efforts in relations with corporate counterparties provides for distributing the programmes, policies, standards of conduct, procedures, and rules intended to prevent and counter corruption that are used in the Company among the corporate counterparties. Certain provisions concerning compliance with anti-corruption standards should be incorporated in the contracts made with corporate counterparties.

15.2. Anti-corruption programmes, policies, standards of conduct, procedures, and rules will be distributed both among corporate counterparties and among affiliates (controlled entities). In particular, the Company shall enforce the anti-corruption measures with all subsidiaries controlled thereby.

15.3. The Company will take effort to inform the public on the status and deliverables of the anti-corruption measures, in particular, by posting the relevant information on the Company's official website.

16 Cooperating with Law-Enforcement Agencies to Counter Corruption

16.1. Cooperation with law-enforcement agencies is an important indicator of the Company's actual commitment to the anti-corruption standards of conduct declared thereby.

16.2. The Company publicly undertakes to report the instances of corruption offences that come to business entity's (business entity employees') notice to the relevant law-enforcement agencies.

16.3. The entity undertakes to abstain from any retaliation against its employees reporting the information concerning preparation or commission of a corruption offence that comes to their notice during performance of employment duties to law-enforcement agencies.

16.4. Besides, cooperation with law-enforcement agencies may take the following forms:

- Providing authorised representatives of oversight and law-enforcement agencies with assistance during the inspection audits of the Company's activities intended to prevent and counter corruption;

- Assisting the authorised representatives of law-enforcement agencies with activities intended to suppress or investigate corruption-related crimes, including investigative activities.

16.5. The Company management and its employees should assist with detection and investigation of corruption by law-enforcement agencies along with taking effort to retain the documents and information containing data on corruption offences and deliver them to law-enforcement agencies. Report files and responses to law-enforcement agencies' inquiries should be prepared with involvement of specialists in the relevant field of law.

16.6. The Company management and employees shall not interfere with the performance of their duties by judicial or law-enforcement officials.

17 Company Employees' Liability for Failure to Comply with the Requirements of the Anti-Corruption Policy;

17.1. The Company and all Company employees must comply with the statutory provisions of the current anti-corruption laws of the Russian Federation, including the Criminal Code of the Russian Federation, Administrative Offences Code of the Russian Federation, and Federal Law No. 273-FZ dated 25 December 2008 "On Countering Corruption".

17.2. All Company employees, regardless of their position, shall be liable for failure to comply with the principles and requirements hereof as provided for by the current laws of the Russian Federation.

17.3. The persons found in breach of the requirements hereof may incur disciplinary, administrative, civil, and criminal liability as provided for by the relevant laws and regulations of the Russian Federation.

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

18.1. The Company officials responsible for preventing and countering corruption shall implement ongoing monitoring of the Anti-Corruption Policy for implementation efficiency; if necessary, this Policy may be amended and revised accordingly.

18.2. The Anti-Corruption Policy adopted by the Company may be revised in case of the relevant amendments to the current laws of the Russian Federation.

19 Standard Anti-Corruption Clause to Be Incorporated in Contracts Made by the Company

19.1. When fulfilling their obligations hereunder, neither the Parties, nor their affiliates, employees, or agents shall pay, offer to pay, or permit payment of any funds or valuables, whether directly or indirectly, to any persons with a view to influencing these persons' actions or decisions in order to obtain any undue advantages or achieve any inappropriate purposes.

When fulfilling their obligations hereunder, the Parties, their affiliates, employees, or agents shall not take any steps qualified under the laws applicable for the purposes hereof as bribe giving or taking, trading in influence, as well as any other steps in conflict with the requirements of the applicable laws and international treaties on countering the legalisation (laundering) of the proceeds of crime.

19.2. Should either Party suspect that a breach of any of the above provisions has taken place or may take place, the relevant Party shall immediately notify the other Party of the wrongdoing that has come to its notice in writing and provide additional explanations and necessary information (supporting documents) upon request, if required.

19.3. The Party receiving a notice of breach in respect of any provisions in Clause 1 of this Section shall review the notice and report the decision to the other Party within ten (10) business days upon receipt thereof in writing.

19.4. The Parties warrant that they will investigate the breach of Clause 1 of this Section properly in compliance with the principles of confidentiality and adopt effective measures to prevent any possible conflicts. The Parties warrant that there will be no adverse consequences for the notifying Party as a whole and for the specific employees of such notifying Party who reported such breach.

19.5. If the breach of Clause 1 of this Section by either Party is confirmed and/or the other Party receives no information on the decision upon review of the notice of breach in accordance with Clause 2 of this Section, the other Party may terminate this Contract unilaterally and out of court by sending a written notice thirty (30) calendar days prior to the Contract termination date at the latest.