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| **ANTI-CORRUPTION POLICY REGULATIONS**  **LLC “EL 6”** | | | |
| **Company:** | LLC “EL 6” | **Field:** | Law enforcement activities |
| **Directorate:** | Asset Protection and Security Directorate | **Director:** | A.V. Myaukin |
| **Department:** |  | **Senior Officer:** |  |
| **Date of adoption or last revision:** | June 2022 | | |

**TERMS AND DEFINITIONS USED**

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| **Company:** | LLC “EL 6” |
| **Company Branches** | El 6 Novosibirsk, El 6 Novocherkassk, El 6 Chelyabinsk. |
| **Company Management** | General Director of the Company, Deputy General Directors, Directors of structural (responsible) units of LLC “EL 6”, Managing Directors of Branches. |
| **Employees** | Individuals who have entered into an employment relationship with the Company or Branches. |
| **Counterparty** | Person recognized as such in accordance with the applicable Regulations on Contractual Work. |
| **Corruption** | Abuse of office, bribery, mediation in bribery, abuse of authority, commercial bribery or other illegal use by an employee of the Company or Branches of his/her official position against the legitimate interests of the Company, Branches and the state in order to obtain benefits in the form of cash, valuables, other property or services of a property nature, other property rights for oneself or third parties, or illegal provision of such benefits to the specified person by other individuals, as well as the commission of such acts on behalf or in the interests of the Company and/or Branches. |
| **Conflict of Interest** | Situation when the personal interest (direct or indirect) of an employee of the Company and/or Branches affects or may affect the proper, objective and impartial performance of his/her official (labor) duties and/or any contradiction between the personal interest of an employee and the legitimate interests of the Company/Managed Company, which may damage the business reputation of the Company or Managed Company, arises or may arise. |
| **Personal Interest of an Employee** | Interest of an employee of the Company and/or Branches associated with any possibility of receiving (in the pursuance of his/her duties) income in the form of cash, valuables, other property or services of a property nature, other property rights, deliverables of works performed or any benefits by such employee and/or of any close relatives or relatives-by-marriage (parents, spouses, children, siblings, as well as siblings, parents, children of spouses, and spouses of children), individuals and entities bound by property, corporate or any other close relations with the employee and/or close relatives or relatives-by-marriage of such employee. |
| **Corruption Practices** | Illegal actions of employees of the Company and/or Branches, that lead or may lead to Corruption. |
| **Corruption Offenses** | Corruption Practices of employees of the Company and/or Branches entailing the imposition of criminal, administrative or disciplinary liability. |
| **Corruption Risks** | The possibility of committing a Corruption Offense by an employee of the Company and the Branch, as well as by other persons on behalf or in the interests of the Company and/or the Branch. |
| **SS** | Asset Protection and Security Directorate of the Company or the Security Services of the Branches |
| **Corporate Network** | A set of local electronic networks of the Company and/or Branches. |

**1. GENERAL PROVISIONS**

1.1. These Anti-Corruption Policy Regulations (hereinafter referred to as these Regulations) have been developed in accordance with the Constitution of the Russian Federation, Article 13.3. of Federal Law No. 273-ФЗ dated 25.12.2008 On Combating Corruption and constitutes a local regulatory document of the Company and its Branches.

1.2. These Regulations shall extend to all employees of the Company and the Branches, regardless of the positions they hold and the functions they perform.

1.3. The Anti-Corruption Policy is a set of interrelated principles, procedures and specific measures aimed at preventing Corruption, as well as preventing and suppressing any Corruption Practices and/or Corruption Offenses of employees of the Company and Branches.

1.4. The Anti-Corruption Policy reflects the commitment of the Company and Branches to the state’s policy striving to improve the performance of the state machinery (in particular, in relations with and between business entities) based on the principles of transparency, predictability and mutual trust.

1.5. Upon entry into employment with Company or Branches, individuals shall familiarize themselves with these Regulations against signature in accordance with the procedure determined by the Human Resources Directorate.

**2. GOALS AND OBJECTIVES OF THE ANTI-CORRUPTION POLICY AND RESULTS OF ITS APPLICATION**

The goal of the Anti-Corruption Policy is to develop and implement the system of measures aimed at combating Corruption and ensuring the prevention of Corruption Practices and/or Corruption Offenses of employees of the Company and Branches.

The objectives of the Anti-Corruption Policy are:

- determination of the list of Corruption Practices and Offenses;

- informing employees of the Company and Branches about the regulatory framework for the prevention of Corruption and responsibility for committing Corruption Offenses;

- determination of the basic principles of preventing Corruption in the Company and Branches;

- methodological support for the development and implementation of all measures aimed at preventing and combating Corruption in the Company and Branches;

- imposition of liability on employees of the Company and Branches for non-compliance with the Anti-Corruption Policy requirements.

As a result of the Anti-Corruption Policy application, the Company will ensure the following:

- elimination of risks of Corruption Practices and/or Corruption Offenses of the Company and Branches and/or employees thereof;

- raising the anti-corruption corporate awareness among all employees of the Company and Branches, as well as a uniform understanding of the position on zero tolerance to Corruption in any of its forms and manifestations;

- establishing an obligation of employees of the Company and Branches to be aware of and comply with the provisions of anti-corruption legislation, as well as the requirements of these Regulations.

**3. BASIC PRINCIPLES OF THE ANTI-CORRUPTION POLICY APPLICATION**

**3.1. Basic Principles of Preventing Corruption Practices.**

3.1.1. Principle of Anti-Corruption Policy compliance with the applicable legislation and generally accepted statutory provisions, which implies that any measures implemented by the Company and/or Branches shall comply with the Constitution of the Russian Federation, anti-corruption legislation, international treaties concluded by the Russian Federation, and other regulations applicable to the Company and Branches.

3.1.2. The principle of prohibition of Corruption Practices, which implies that employees of the Company and Branches shall refrain from any practices that may be considered Corruption.

3.1.3. The personal example principle, which implies that the Management of the Company and Branches shall cultivate intolerance to Corruption among the employees under their control, including through working meetings, consultations, methodological meetings and general corporate meetings in order to prevent any practices that may be considered Corruption.

3.1.4. The principle of awareness of employees, which implies the periodic briefing of employees about the anti-corruption legislation in effect in the Russian Federation, amendments and addenda thereto; implementation of certain standards of conduct and procedures in order to ensure fair work in the practice of the Company and Branches; prevention and settlement of Conflicts of Interest; measures taken in the Company and Branches to prevent Corruption, including those:

- to identify and eliminate possible causes of Corruption;

- to investigate and ensure court consideration of Corruption Offenses, which employees of the Company and/or Branches may have participated in;

- to minimize and/or eliminate Corruption Risks.

**3.2. Basic Principles for Determining the List of Disclosed Information Provided by a Potential Employee at Employment, as well as in the Course of Work.**

3.2.1. Principle of completeness of disclosed information about possible conflicts of interest, which implies that individuals, upon entry into employment with the Company or Branches, shall provide the maximum scope of the following reliable information about:

- ownership of shares and interests in business entities, as well as the participation in business partnerships;

- appointment of the sole executive body (Director, General Director General, General Director of the managing company) and/or collegiate executive body (Directorate, Management Board) of the Counterparty, as well as the election to its Board of Directors;

The procedure for disclosing all information listed in this Sub-Clause is determined in Clause 6.1. hereof.

3.2.2. Principle of disclosure of information about a real Conflict of Interest, implying that when selecting or interacting with a Counterparty, employees of the Company and Branches participating in this procedure shall immediately disclose the following information about:

- ownership of shares and interests of the Counterparty, as well as the participation therein, if the Counterparty is a business partnership;

- appointment of the sole executive body (Director, General Director General, General Director of the managing company) and/or collegiate executive body (Directorate, Management Board) of the Counterparty, as well as the election to its Board of Directors;

- employees of the Counterparty with whom they are in kinship, friendship and other personal relations;

- kinship, friendship and other personal relations with the Counterparty, who is an individual entrepreneur or a self-employed individual.

The procedure for disclosing all information listed in this Sub-Clause is determined in Clause 6.2. hereof.

3.2.3. Principle of disclosing information about public and municipal service, which implies that individuals who have been employed by public and municipal authorities shall disclose the date of their discharge from service upon entry into employment with the Company and Branches.

The procedure for disclosing all information listed in this Sub-Clause is determined in Clause 6.3. hereof.

**3.3. Basic Principles when Introducing Standards of Conduct in Relations with Persons with Whom Employees of the Company and Branches Enter into Business Relations.**

3.3.1. Principle of openness, which implies that when employees of the Company and Branches are induced to engage in Corruption Practices, these employees shall inform the persons with whom they enter into business relations about the anti-corruption standards, norms and rules of conduct in accordance with these Regulations.

3.3.2. Principle of liability and inevitability of punishment, which implies the possible disciplinary liability in the event that actions committed by employees, as well as other failure to comply with the requirements hereof, have caused material damage to the Company and/or Branches, damage to the business reputation, or such actions served as the basis for holding the Company and/or Branches liable for violations of anti-corruption legislation.

**4. LIST AND PREVENTION OF CORRUPTION PRACTICES, INCLUDING OFFENSES**

**4.1. Possible Corruption Practices of Employees of the Company and Branches, which are Recognized as the Corruption Offenses and Entail the Imposition of Criminal Liability on the Employees who Committed the Same.**

4.1.1. Bribery in the form of cash, securities, other property or in the form of illegal services of a property nature (*for example, the provision of free travel packages, apartment renovation, construction of summer residences, etc*.), granting of other property rights *(in particular, the assignment of someone debts with the possibility of reclaiming them*) by an employee personally or at his/her order or at the request of other employees or other persons to a person holding any positions in public and municipal authorities (institutions, corporations), including foreign ones (in particular, international organizations) vested with administrative rights, so that such a person, with their help, commits or facilitates the commission of any acts (omissions) to the benefit of the employees of the Company and/or Branches, or enables it (*for example, bribery committed so that an official of the state control authority does not react to any violations revealed during inspection, issuing no prescription or report on administrative offenses, etc.*) (Article 291 of the Criminal Code of the Russian Federation).

4.1.2. Mediation in bribery, that is, the direct transfer of a bribe from other employees or persons to the persons specified in Clause 4.1.1. (Article 291.1.of the Criminal Code of the Russian Federation).

4.1.3. Abuse of authority by any employee of the Company and Branches having administrative rights, against the legitimate interests of the Company and/or Branches, in order to gain benefits and advantages for themselves or other persons, or inflict damage to other persons, if such actions cause significant harm to the rights and legitimate interests of the Company and/or Branches, Counterparties and other persons with whom employees enter into business relations *(for example, giving an order to sell low-quality goods at the price of high-quality ones, inter alia, in order to fulfill the supply plan and receive bonuses for overachievement, etc.)* (Art. 201 of the Criminal Code of the Russian Federation).

4.1.4. Commercial bribery, that is, the transfer by an employee of the Company or Branches to employees of other organizations with which he/she enters into business relations, as well as the transfer by such employees to an employee of the Company or Branches and his/her receipt of cash, securities, other property, provision of property services, granting of other property rights for interfering with the use of existing authority in the activities of such organizations and performing any actions in the interests of the giver, or any other person on whose behalf acts take place *(for example, an employee of the Counterparty receives cash from an employee of the Company or Branch to interfere with the activities of the Counterparty and lobby for the purchase of goods from the Company or Branch outside the stipulated procurement procedures, while using his/her authority; the employee of the Company or Branch receives cash from the Counterparty’s employee for using his/her authority to interfere with the activities of the Company and lobby for the purchase of goods from the Counterparty outside the stipulated procurement procedures*) (Article 204 of the Criminal Code of the Russian Federation).

4.1.5. Provocation of a bribe, commercial bribery, that is, an attempt to transfer to a person without his consent, securities, other property or to provide him with property services, provision of other property rights in order to artificially create evidence of a crime or blackmail (*for example, giving gifts to a Third Party Entity working for Counterparty, just like that, and then a message to him that this gift was given in order for the latter to interfere with the activities of J (the counterparty and lobby for the purchase of goods by the Counterparty from the Company outside the procedures provided for their procurement procedures) (Article 304 of the Criminal Procedure of the Code of the Russian Federation*).

**4.2. Possible Corruption Practices, which Constitute Corruption Offenses and Entail Imposition of Administrative Liability for the Company and/or Branches**

4.2.1. Illegal transfer, offer or promise of cash, securities or other property, the provision of services of a property nature or the granting of property rights to an official, a person performing management functions in a commercial or other organization on behalf of or in the interests of a legal entity or in the interests of a related legal entity, for the commission of any acts (omissions) by that official, person performing management functions in a commercial or other organization, pertaining to the official position held by such person in the interests of this legal entity or in the interests of a related legal entity (Article 19.28 of the Code of Administrative Offenses of the Russian Federation).

4.2.2. Employment of a public or municipal official holding any position included in the [list](http://www.consultant.ru/document/cons_doc_LAW_102793/#dst100007) determined by regulatory legal acts, or a former public or municipal official holding such a position under the terms and conditions of an employment contract or engagement of such a person to perform works (provide services) under the terms and conditions of a civil law contract (in violation of the requirements stipulated by Federal [Law](http://www.consultant.ru/document/cons_doc_LAW_351246/e319cca703566186bfd83cacbeb23b217efc930e/#dst28) No. 273-ФЗ dated December 25, 2008 On Combating Corruption (Article 19.29 of the Code of Administrative Offenses of the Russian Federation)).

Note: An employer, upon concluding an employment or civil law contract for the performance of work (provision of services) with an individual who held positions in state or municipal authorities, the [list](http://www.consultant.ru/document/Cons_doc_LAW_102793/#dst100007) of which is stipulated by the regulatory legal acts of the Russian Federation, shall within ten (10) days notify the representative of the employer (hirer) of a public or municipal official at the last place of his/her service about the conclusion of such an agreement within two (2) years after his/her discharge from such public or municipal authorities in accordance with the [procedure](http://www.consultant.ru/document/Cons_doc_LAW_203192/#dst100009) set forth in the regulations of the Russian Federation (Part 4 of Article 12 of Federal Law No. 273-ФЗ dated December 25, 2008 On Combating Corruption ).

**4.3. Possible Corruption Practices of Employees of the Company and Branches Entailing the Imposition of Disciplinary Liability in Accordance with the Labor Code of the Russian Federation.**

4.3.1. A Corruption Practice shall be recognized and entail disciplinary liability if an employee of the Company or Branch engages any Counterparty without the consent of the General Director of the Company in all cases where the employee:

- owns shares and interests of the Counterparty, as well as participates in it, if the Counterparty is a business partnership; or

- holds positions of the sole executive body (Director, General Director, General Director of the Managing Company) or collegiate executive body (Directorate, Management Board) of the Counterparty, or is elected to the Board of Directors; or

- is in kinship, family, friendship and other personal relations with employees of the Counterparty; or

- is in kinship, family, friendship and other personal relations with the Counterparty who is an individual entrepreneur or a self-employed individual.

**4.4. Commission of Corruption Offenses Abroad.**

Employees of the Company and Branches, who are national of the Russian Federation and commit any Corruption Offenses abroad as specified in Clause 4.1. hereof, may be prosecuted in accordance with the legislation of the host country or in accordance with the Criminal Code of the Russian Federation, if there is no foreign court decision regarding the committed offense.

**4.5. Prevention of Corruption Practices by the Company's Management.**

4.5.1. When preventing Corruption Practices, the General Director of the Company shall:

- arrange the process of receiving and considering reports on possible incidents of inciting employees of the Company and Branches to engage in Corruption Practices, as well as cases of such engagement;

- implement measures to protect the employee who has reported the case of Corruption Practices by other employees of the Company and Branches, in terms of providing the employee with warranties preventing his/her unlawful discharge, transfer to a subordinate position, deprivation or reduction of bonuses, postponement of leave, imposition of disciplinary liability;

- ensure the confidentiality of consideration of all submitted reports on any possible incitement to engage in Corruption Practices;

- provide assistance to the authorized representatives of law enforcement agencies in implementing measures to suppress and/or investigate Corruption Offenses, including the involvement in various intelligence and surveillance activities;

- organize the assessment of the Anti-Corruption Policy Regulations implementation and drawing up of the relevant reporting materials.

4.5.2. When implementing the requirements of the Anti-Corruption Policy, the Management of the Company shall be responsible for holding working meetings, consultations, methodological meetings and general corporate meetings in accordance with the general principles of preventing Corruption Practices specified in Clause 3.1. hereof.

**4.6. Prevention of Engagement of Employees of the Company and Branches in Corruption Practices**

4.6.1. Employees of the Company and Branches, acting on behalf and for the benefit thereof, shall:

- strictly comply with the provisions of these Regulations in the course of their professional activities, be guided by principles and requirements thereof;

- refrain from engagement and/or participating in any Corruption Practices, regardless of the place of stay in the Russian Federation or abroad;

- refrain from conduct that may be interpreted by others as a willingness to engage in or participate in any Corruption Practices and/or Corruption Offenses;

- immediately inform the Company Management and/or SS of the known facts of inducement to engage in Corruption Practices, using any convenient and accessible method (orally, in writing, by e-mail, telephone message), including the possibility of applying a special form of the Notification provided for in Appendix 1 to these Regulations;

- immediately inform the Company Management and/or SS of the known facts of engagement in Corruption Practices and/or Offences of other employees, Counterparties and/or their representatives, using any convenient and accessible method (orally, in writing, by e-mail, telephone message), including the possibility of applying a special form of the Notification provided for in Appendix 1 to these Regulations;

**5. MEASURES TO PREVENT CORRUPTION IN INTERACTION WITH COUNTERPARTIES**

5.1. The Company and Branches shall take measures to prevent Corruption when interacting with Counterparties in the following areas:

- establishment and maintenance of business (economic) relations with the Counterparties acting in good faith and fairly, taking care of their own reputation, demonstrating compliance with high ethical standards in own business activities, implementing their own anti-corruption measures, participating in collective anti-corruption initiatives;

- implementation of special procedures for checking all Counterparties in order to reduce the risk of involvement of the Company and/or Branch in Corruption Practices and other unfair practices in the course of relations with Counterparties (collection and analysis of all information about potential Counterparties, their reputation in the business community, duration of their economic activity in the market, participation in corruption scandals, etc.);

- communication of programs, policies, standards of conduct, procedures and rules aimed at preventing and combating Corruption, which are applied in the Company and its Branches, to the Counterparties, inter alia by incorporating provisions and conditions on strict observance of standards, principles and rules of conduct in accordance with the effective Anti-Corruption Policy into corporate forms of contracts (Anti-Corruption Clause);

**6. INFORMATION TO BE DISCLOSED UPON ENTRY INTO EMPLOYMENT AND IN THE COURSE OF WORK**

**6.1. Disclosure of Information about Possible Conflicts of Interest.**

6.1.1. Upon entry into employment with the Company or Branch, individuals shall provide the maximum scope of reliable information about:

- ownership of shares and interests in business entities, as well as the participation in business partnerships;

- appointment of the sole executive body (Director, General Director General, General Director of the managing company) and/or collegiate executive body (Directorate, Management Board) of the Counterparty, as well as the election to its Board of Directors;

The above information shall be provided in accordance with the procedure determined by the Human Resources Directorate and transferred to the SS once received.

The SS shall verify the information provided for its reliability before the execution of an employment contract with such persons. In this case, the revealed unreliability of such information shall entail a refusal to execute an employment contract.

6.1.2. Employees of the Company and Branches, having provided the information specified in Sub-Clause 6.1.1. hereof, shall immediately notify the SS of any changes therein by sending an electronic communication using the Corporate Network.

**6.2. Disclosure of Real Conflicts of Interest.**

6.2.1. When selecting a Counterparty or interacting therewith, employees of the Company and Branches participating in the selection of a Counterparty or interaction therewith shall immediately disclose all information about:

- ownership of shares and interests of the Counterparty, as well as the participation therein, if the Counterparty is a business partnership;

- appointment of the sole executive body (Director, General Director, General Director of the managing company) and collegiate executive body (Directorate, Management Board) of the Counterparty, as well as the election to its Board of Directors;

- employees of the Counterparty with whom they are in kinship, family, friendship and other personal relations;

- kinship, family, friendship and other personal relations with the Counterparty who is an individual entrepreneur or a self-employed individual.

This information shall be provided to the Company Management, as well as to the SS immediately upon detection of these facts by sending an electronic communication in the Corporate Network.

**6.3. Disclosure of Information about Public and Municipal Service.**

6.3.1. Upon entry into employment with the Company or Branch, individuals shall provide the information about their positions in public and municipal authorities, as well as the date of their last discharge from such service. Such information shall be provided in accordance with the procedure determined by the Human Resources Directorate.

6.3.2. Upon receipt of information from a hired individual that he/she held public and municipal office and at the same time, more than two years have passed since his/her discharge from that position, he/she shall also disclose information on possible facts of interaction with the Company and/or Branches for period of service in public and municipal authorities. Such information shall be provided in accordance with the procedure determined by the Human Resources Directorate.

**7. STANDARDS OF CONDUCT FOR EMPLOYEES OF THE COMPANY AND BRANCHES IN RELATIONS WITH THE PERSONS WITH WHOM EMPLOYEES ENTER INTO BUSINESS RELATIONS**

7.1. All employees shall be aware of the List of Corruption Practices set forth in Sub-Clauses 4.1.-4.3. hereof and refrain from the same.

7.2. If employees participate in the selection of a Counterparty or interact therewith in the context of a real Conflict of Interest (see Sub-Clauses 3.2.2. and 6.2. hereof), they shall:

When making decisions on business issues and performing their job duties, be guided by the interests of the Company and Branches without regard to their personal interests;

- contribute to the resolution of any Conflict of Interest.

7.3. The Employee, in case of incitement to engage in Corruption Practices or when receiving information about the incitement of other employees of the Company and Branches, Counterparties and/or their representatives to engage in Corruption Practices, and in cases that he/she has become aware in the course of professional activities of the facts of direct engagement of the above persons in any Corruption Practices, shall immediately inform the Company Management and/or SS using any convenient and accessible method (orally, in writing, by e-mail, telephone message), including the possibility of applying a special form of the Notification provided for in Appendix 1 hereto;

7.4. Information received from the employee about possible Corruption manifestations shall be considered within three (3) business days. At the same time, based on the results of consideration of the information received, either a decision will be made to conduct an official investigation upon which a set of necessary measures and responsible persons shall be determined, or a conclusion shall be made on the absence of sufficient grounds for such an investigation, if the information about the fact stated by the employee does not contain obvious characteristics of Corruption Practices or conduct that may be considered Corrupt.

When considering the employee’s report on possible Corruption manifestations and making a decision on the need to conduct an official investigation for the presence of characteristics of Corruption in the information provided, the employee who provided such information may be requested to give a written explanation.

The verification of the information received from the employee about possible corruption manifestations shall be completed no later than one (1) month from the date of the decision on its conduct, and its results shall be presented in the form of a written opinion.

By decision of the Company Management, an employee in respect of whom information has been received regarding the engagement in Corruption Practices or conduct that may be recognized as Corruption in his/her professional activities, may be temporarily suspended from his/her position for the period of the investigation with the retention of wages for this period.

If, as a result of the investigation, circumstances are established that indicate the presence of characteristics of a Corruption Offense, the investigation materials shall be sent to law enforcement agencies.

If the facts reported by the Employee are not confirmed, but any signs of a Conflict of Interest are revealed in the course of the investigation, the relevant measures shall be taken to resolve the same.

7.5. If there are sufficient grounds to believe that a certain employee or certain employees of the Company and/or Branches have engaged in Corruption Practices or conduct that may be recognized as Corruption in their professional activities, the SS may independently initiate an internal investigation in respect of any such employee or such employees, regardless of the position held and functions performed by them.

7.6. If an employee has reported information that clearly indicates the presence of characteristics of a Corruption Offense entailing criminal or administrative liability, then the information about such facts shall be sent to law enforcement agencies no later than ten (10) days from the date of receipt. Further actions on the report shall be carried out in accordance with the requirements of law enforcement agencies and in the manner prescribed by the applicable legislation of the Russian Federation.

**8. COOPERATION WITH REGULATORY AUTHORITIES AND LAW ENFORCEMENT AGENCIES IN THE FIELD OF COMBATING CORRUPTION**

8.1. The cooperation with regulatory authorities and law enforcement agencies is an important indicator of the real commitment of the Company and Branches to the declared anti-corruption standards of conduct.

8.2. The Company and Branches undertake a public commitment to provide law enforcement agencies with all information about any cases of Corruption Offenses revealed in the course of their business activities.

8.3. The Company and the Branches undertake to refrain from any sanctions against employees who reported to the regulatory and supervisory and law enforcement authorities about any threatening or already committed Corruption Offense.

8.4. The cooperation with regulatory authorities and law enforcement agencies shall also take the form of:

- assistance to the authorized representatives of regulatory authorities and law enforcement agencies in the performance of their intelligence and surveillance activities regarding the Company and/or Branches on the issues of preventing and combating Corruption;

- assistance to the authorized representatives of law enforcement agencies in implementing measures to suppress and/or investigate Corruption Offenses, including the participation in various intelligence, surveillance, investigation and procedural activities.

**9. GIFTS AND HOSPITALITY EXPENSES**

9.1. Gifts and hospitality expenses, including business hospitality, which employees of the Company or Branches may use on their behalf as gifts to other persons and organizations or, according to their professional activities, receive from other persons and organizations, shall comply with a combination of the following criteria:

- be directly related to the goals of the Company and its Branches;

- be reasonably justified, proportionate and not attributed to luxury items;

- not constitute a hidden remuneration for the service, action, omission, connivance, patronage, granting of rights, making a certain decision on a transaction, agreement, license, permit and other similar decisions or an attempt to influence the recipient for any other illegal or unethical purpose;

- not obligate its recipient;

- not be in the form of cash and non-cash funds, securities, precious metals or stones;

- not create reputational risks for the Company and Branches, as well as their employees;

- not contradict the provisions of the applicable legislation of the Russian Federation (Para. 4, Part 1, Article 575 of the Civil Code of the Russian Federation), standards, principles, rules or requirements hereof.

9.2. All gifts in the form of souvenirs (low-value products) with the symbols of the Company and/or Branches provided at exhibitions, presentations and other events, where the Company and/or Branches officially participate, are not prohibited and shall be considered as reputational materials.

**10. RAISING ANTI-CORRUPTION AWARENESS OF EMPLOYEES OF THE COMPANY AND BRANCHES**

10.1. The Company and Branches shall raise anti-corruption awareness of employees in order to form an anti-corruption worldview and intolerance to corrupt behavior, increase the level of legal awareness and legal culture of employees by anti-corruption education and anti-corruption consulting services.

10.2. Anti-corruption awareness of employees of the Company and Branches shall be raised at the expense of the Company in the form of messages and publications in corporate periodicals and the Corporate Network, as well as through self-education of employees of the Company and Branches.

10.3. The SS representatives shall provide anti-corruption consulting to the employees of the Company and Branches on an individual basis, including on private issues of combating corruption and resolving the Conflict of Interest.

**11. PROCEDURE FOR REVISION AND AMENDMENTS TO THE ANTI-CORRUPTION POLICY REGULATIONS**

11.1. The Company and Branches shall constantly monitor the efficiency of the Anti-Corruption Policy.

11.2. The revision of these Regulations may take place in case of any changes in the labor and anti-corruption legislation, as well as the organizational and legal form or organizational and staff structure of the Company and Branches.

**12. FINAL PROVISIONS**

Failure to comply with the requirements of these Regulations by employees of the Company and Branches shall entail disciplinary liability.

**13. PERSON RESPONSIBLE FOR COMPLIANCE WITH THIS ANTI-CORRUPTION POLICY**

The person responsible for monitoring compliance with the requirements hereof is Deputy General Director for Asset Protection and Security.

**14. DOCUMENT APPROVED**

Order of the General Director No. \_\_\_ dated \_\_\_\_\_\_\_\_\_\_\_ \_\_\_, 2022

**Appendix 1**

to Anti-Corruption Policy Regulations of LLC “EL 6” (Notification Form)

To General Director \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*(Full name)*

Deputy General Director for Asset Protection and Security \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*(Full name)*

Deputy General Director;

Director of the responsible unit;

Managing Director of the Branch

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Full name)

from\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*(Full name, position, phone number of the employee)*

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**NOTIFICATION**

**on the appeal for the purpose of inciting an employee to engage in Corruption Practices and/or commit Corruption Offenses (information about any incidents of inciting the engagement in Corruption Practices and/or commission of Corruption Offenses by other employees, Counterparties or other persons known to the employee, or the facts of engagement in Corruption Practices and/or Corruption Offenses**

***(underline as necessary)***

Hereby I report that:

1.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*(description of the circumstances of the appeal ensuring the incitement of the engagement in Corruption Practices and/or commission of Corruption Offenses (date and place of the appeal, action (inaction) to be incited, proposed benefits, expected consequences, as well as other circumstances of the appeal)*

2.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*description of the circumstances ensuring the awareness of all cases of engagement in Corruption Practices and/or commission of Corruption Offenses by other employees, Counterparties and other persons, detailed information about possible (committed) Corruption Practices and/or Corruption Offenses*

3.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  *known information about a person (an individual or a legal entity) inciting to any Corruption Practices and/or Corruption Offenses*

4.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ *method and circumstances of incitement to commit any Corruption Practices and/or Corruption Offenses, as well as the information about the refusal (consent) to accept the proposal of a person to commit Corruption Practices and/or Corruption Offenses*

*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

*date signature surname and initials of the employee*