

**APPROVED BY**

Resolution of the Board of Directors  
of OJSC “PC “Kristall”  
of September 14, 2016  
(Minutes No.3 (107) of September 14, 2016)

**ANTI-CORRUPTION POLICY**  
**OF OPEN JOINT-STOCK COMPANY**  
**“PRODUCTION CORPORATION “KRISTALL”**

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## 1. GENERAL PROVISIONS

1.1. This Anti-Corruption Policy (hereinafter – “the Policy”) of OJSC “PC “Kristall” (hereinafter – “the Company”) is the fundamental document determining primary tasks, principles and requirements aimed at corruption combating, mitigation of corruption risks and their effects, and compliance of the Company, its officials, employees and other persons who may act on behalf of the Company with key provisions of the applicable Russian and foreign anti-corruption legislation.

1.2. The Policy highlights adherence of the Company and its management to high ethical standards and fair business principles and commitment of the Company to enhancing its corporate culture, following best practices for corporate governance and maintaining a good business reputation.

1.3. The Policy has been developed in compliance with the legislation of the Russian Federation, Guidelines on Risk Management and Internal Control for Corruption Preventing and Combating in Joint-Stock Companies with the Participation of the Russian Federation approved by Order No.80 of the Russian Federal Agency for State Property Management on March 2, 2016, the Articles of Association and other internal documents of the Company, local legal acts and other regulatory and administrative documents on combating corruption, with consideration to the generally recognized principles and norms of international law.

1.4. The legal basis of the Policy includes generally recognized principles and norms, standards of the international law and international contracts (agreements) of the Russian Federation for corruption combating, Constitution of the Russian Federation, the Criminal Code of the Russian Federation, the Code of Administrative Offences of the Russian Federation, Federal Law No.273-FZ “On Combating Corruption” dated December 25, 2008, other statutes and regulations providing for preventive measures against corruption, repression of corruption offences and liability for them.

1.5. The Company secures the compliance with the Policy by legal entities controlled by the Company, in respect of which the Company may (directly or indirectly, independently or jointly with its affiliates) exercise decisive influence over their decisions due to the majority equity interest in those companies or otherwise, as well as by the contractors and partners of the Company to the extent that the corresponding liabilities have been formalized in contracts with them.

1.6. All the officials and employees of the Company shall abide by this Policy and comply with its principles and requirements.

1.7. This Policy including all amendments (additions) hereto shall be approved by the Resolution of the Board of Directors.

The Company shall at least once every two years evaluate the Policy in terms of its correspondence to the applicable legislation. In case if not effective provisions hereof or business processes of the Company related hereto are identified, or the requirements of the applicable legislation of the Russian Federation or the international legislation ratified by the Russian Federation are changed, the Director General of the Company shall organize the preparation and implementation of the plan of actions to update this Policy and/or business processes.

## 2. TERMS AND DEFINITIONS

The following terms and definitions are used in the Policy:

**The Policy** means the anti-corruption Policy of Open Joint-Stock Company “Production Corporation “Kristall”.

**The Company** means Open Joint-Stock Company “Production Corporation “Kristall” (short name – OJSC “PC “Kristall”).

**The Officials** mean the Director General of the Company, Deputies Director General, Heads of structural subdivisions and all other persons authorized to act on behalf of the Company.

**The employees** mean natural persons being in employment relationships with the Company.

**The Contractor** means any Russian or foreign legal entity or natural or other person entering into any contractual (written or oral) relationships with the Company, exclusive of employment relationships.

**Corruption** means any abuse of office, giving or acceptance of a bribe, abuse of authority, commercial bribery or any other illegal use by a natural person of his/her job position against the lawful interests of the society and the government aimed at receiving benefits in the form of money, valuables, other property or property-related services, other property rights for him/herself or third parties, or illegal provision of such benefits to the said person by other natural persons. Corruption also means the commitment of the above acts on behalf or in the interests of a legal entity.

**Corruption combating** means the Company’s activities aimed at preventing corruption, including the identification and subsequent elimination of corruption causes (preventive measures); detecting, preventing, repressing, revealing and investigating corruption (measures for combating); mitigating and/or eliminating the consequences of corruption offences.

**Corruption prevention** means the Company’s activities aimed at integrating anti-corruption elements into its corporate culture, organizational structure, rules and procedures regulated by the internal regulations (local acts).

**Corruption offence** means any action (inaction) of the officials or the employees of the company, having the signs of corruption or facilitating it.

**Compliance manager** means an employee of the Company who provides the compliance with the requirements of the Policy and the applicable anti-corruption legislation.

**Risk manager** means an employee of the Company who is entrusted through an executive document with the periodical risk assessment.

**Gifts** mean any gifts presented by the officials and employees of the Company on behalf and/or at the account of the Company to contractors or any other third parties, as well as gifts received by the Company, its officials or employees from contractors or any third parties.

**Business hospitality expenses** mean any expenses of the Company for third parties or in their favor, or expenses of the third parties for or in favor of the representatives of the Company related to establishing and/or maintaining business relationships, incurred in the normal course of business, including expenses for business meals, transportation, accommodation, entertainment, etc.

**Bribe** means money, securities, other assets or any illegal property-related services, granting of other property rights transferred/received for committing actions (inaction) by an official in favor of the bribe giver or other persons represented by him/her, if such actions (inaction) fall within official powers (authorities) of the official or if such a person holding the official position may facilitate such actions (inaction), as well as for overall patronage or connivance in office.

**Commercial bribery** means 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 the unlawful rendering of property-related services to him/her for committing actions (inaction) in favor of the giver in connection with the official position held by this person.

**Conflict of interests** means a situation when personal interests (direct or indirect) of an employee of the Company affect or may affect proper fulfillment by such an employee of his/her job responsibilities and when the personal interests of an employee collide or may collide with legitimate interests of the Company, which may cause harm to the legitimate interests, property and (or) business reputation of the Company.

**Personal interest of an employee** means interest of an employee of the Company related to a possibility to obtain by the employee in the course of performance of his/her job responsibilities income in the form of money, valuables, other assets or property-related services, other property rights for himself/herself or third parties.

### **3. GOALS AND TASKS OF ANTI-CORRUPTION POLICY**

3.1. The main goals of the Policy of the Company are as follows:

- develop and implement diversified consecutive measures to prevent, eliminate (mitigate) causes and conditions giving rise to corruption;
- provide compliance of the Company's activities with the Russian and foreign anti-corruption legislation requirements, high ethical standards in business;
- mitigate and/or eliminate risk of involvement of the Company, its employees in corruption;
- shape the anti-corruption consciousness, characterized by intolerance to corruption offences committed by the officials and employees of the Company.

3.2. To achieve the set goals the Company hereby specifies the following tasks for the implementation of the Policy:

- forming a uniform understanding among the contractors, officials and employees of the Company about the Company's opposition to corruption in any forms and aspects;
- mitigation of risk of involvement of the Company, its officials and employees, irrespective of the position held, in corruption;
- prevention of corruption offences and providing liability for corruption offences;
- reimbursement for the damage caused by the corruption offences;
- anti-corruption monitoring for the efficiency of anti-corruption policy measures;
- shaping the anti-corruption corporate consciousness;
- obliging the officials and employees of the Company to be aware of and comply with the principles and requirements hereof, key norms of the applicable anti-corruption legislation;
- motivation of vacancy filling in the Company by incorruptible persons.

#### **4. KEY PRINCIPLES OF ANTI-CORRUPTION POLICY**

4.1. Compliance of the Policy of the Company with the applicable legislation and generally accepted rules.

Anti-corruption measures taken by the Company shall comply with the applicable domestic and international anti-corruption legislation.

4.2. Leadership by example.

Members of the Board of Directors, Director General and top managers of the Company shall form an ethical standard of uncompromising attitude toward any forms and aspects of corruption at all levels of corporate governance, leading by example.

The Company sets the principle of non-admission of corruption in any forms and aspects when carrying out daily activities and strategic projects, including cooperation with shareholders, investors, contractors, government officials, self-governing bodies officials, political parties' representatives, the Company's employees and other persons.

4.3. Employee involvement.

The Company places this Policy freely available on the corporate website in the Internet, openly declares non-admission of corruption, welcomes and encourages observation of the principles and requirements hereof by all contractors, officials and employees of the Company, its subsidiaries, members of their governing boards, their employees and other persons.

The Company contributes to raising the level of anti-corruption culture by informing and educating the employees in order to maintain their awareness of the Company's Anti-Corruption Policy and mastering the ways and methods of applying the Anti-Corruption Policy in practice.

4.4. Efficiency of anti-corruption procedures.

The Company develops and implements anti-corruption procedures, which are economically sound, easy to put into practice and produce a significant result.

4.5. Responsibility and inevitability of punishment.

Inevitability of punishment for the employees regardless of their positions, duration of employment and other factors for corruption offences committed by them.

4.6. Business transparency.

Notification of contractors, partners and the public about the Company's position regarding corruption combating.

4.7. Permanent control and regular monitoring.

Due to possible changes of corruption risks or other factors, which may influence the business operations, the Company regularly monitors the efficiency of the implemented anti-corruption procedures, controls over their observance, reviews and improves them, if necessary.

#### **5. ANTI-CORRUPTION MANAGEMENT STRUCTURE**

5.1. Effective anti-corruption management of the Company is achieved through productive and prompt cooperation of the following participants:

- The Board of Directors;
- Director General;
- Compliance manager;

- Risk manager;
  - Employees of the Company.
- 5.2. Functional roles of the above participants in connection with the anti-corruption activities of the Company are as follows:
- 5.2.1. The Board of Directors shall:
- approve this Policy;
  - consider and approve alterations and additions hereto;
  - control over the total results of implementation and application hereof.
- 5.2.2. Director General of the Company shall be responsible for organization of measures aimed at implementation of principles and requirements hereof, including the appointment of persons authorized to develop, implement and control over the anti-corruption procedures.
- 5.2.3. Compliance manager shall:
- monitor the functioning of adequate procedures aimed at mitigation of corruption risks, specific for the Company's activities;
  - initiate updating of the Company's internal regulatory documents in view of changes in anti-corruption legislation;
  - carry out routine and extraordinary inspection of the Company's compliance with the principles hereof, draw up reports based on the inspection results.
- 5.2.4. Risk manager shall:
- coordinate the process of corruption risks identification, specific for the Company's activities;
  - carry out regular updating and assessment of corruption risks based on the information obtained from the compliance manager, as well as from other sources;
  - provide information on corruption risks to the compliance manager for the preparation of the annual plan of supervision over the compliance of the Company with the requirements of the anti-corruption legislation.
- 5.2.5. Cooperation with the structural subdivisions and employees of the Company on the issue of compliance of their activities with the anti-corruption legislation requirements is performed pursuant to the applicable regulatory documents of the Company.

## **6. FUNCTIONS AND POWERS OF THE COMPLIANCE MANAGER**

- 6.1. The compliance manager of the Company is responsible for organization and efficiency of all measures aimed at implementation of principles and requirements of the present Policy, development, introduction and control over the anti-corruption procedures.
- 6.2. None of the heads or employees of any structural subdivision of the Company, who are responsible for such business areas as purchases, sales, lease relations and personnel recruitment may become the compliance manager of the Company.
- 6.3. Goals, tasks, powers and responsibilities of the compliance manager are specified in his/her job description and the present Policy.
- 6.4. In order to achieve the set goals the compliance manager performs the following tasks:
- 6.4.1. Risk identification and assessment, monitoring of areas exposed to corruption risks through monitoring transactions exposed to corruption risks pursuant to the procedures established by internal regulatory documents of the Company.
- 6.4.2. Coordination of efforts to ensure the development and introduction of measures for preventing and combating corruption as follows:
- promotion of corporate ethical values of the Company;

- making up a plan (program) to develop, implement and introduce measures for preventing and combating corruption;
  - consulting of employees of the Company regarding the introduction of measures for preventing and combating corruption;
  - methodological support for the employees of the Company regarding the improvement of measures for preventing and combating corruption;
  - development of internal regulatory documents aimed at implementing measures for preventing and combating corruption (Anti-Corruption Policy, Code of Corporate Ethics, etc.);
  - collection and analysis of information about offences having signs of corruption detected through the checks/investigation or information obtained through violation reporting channels (such as the telephone hotline);
  - implementation of/supervision over/participation in investigation of offences having signs of corruption;
  - preparation of reports on measures taken to prevent and combat corruption;
  - analysis of proposals on improving anti-corruption procedures obtained, inter alia, through violation reporting channels.
- 6.4.3. Informing and training of the employees of the Company, including:
- monitoring and analysis of changes in the anti-corruption legislation/judicial practice regarding corruption cases (on an international scale);
  - training of employees on the issue of compliance with anti-corruption legislation and requirements of local regulatory documents on preventing and combating corruption.
- 6.5. For the avoidance of conflicts of interests, the compliance manager shall not participate in such events as inspections, internal investigations, etc. if he/she has a competing professional or personal interest (financial, property, related or any other interest) in the held event.
- 6.6. Compliance manager cooperates with structural subdivisions of the Company for the development and improvement of measures aimed at preventing and combating corruption.
- 6.7. Within the scope of his/her employment the compliance manager cooperates with the state regulatory and law enforcement authorities according to the procedure envisaged by the law and internal documents of the Company.
- 6.8. Compliance manager's report on the results of his/her work aimed at providing compliance of Company's operations, activities of the officials and employees of the Company with the principles and requirements of the present Policy and the applicable anti-corruption legislation shall be submitted periodically (at least once per six months) to Director General of the Company.

## **7. ANTI-CORRUPTION POLICY AND THE EMPLOYEES OF THE COMPANY**

- 7.1. The Company requires from its employees to comply with this Policy and notifies them on key principles, requirements and sanctions for corruption offences. All the employees of the Company shall be guided by this Policy and strictly comply with its principles and requirements.
- 7.2. The employees of the Company get acquainted with the Policy and commit themselves to adhere to the requirements of the Policy in their professional activities.  
Employee's compliance with the Policy shall be considered when assessing business proficiency of an employee, including appointment of the employee to the higher position, and when settling other personnel issues.



- 7.3. The employees of the Company shall strictly adhere to the restrictions and requirements stipulated by the Policy, including those related to presenting and obtaining gifts; charity or sponsor activities; interaction with the representatives of governmental authorities and public organizations, contractors, intermediaries, third parties; avoiding conflicts of interest.
- 7.4. All employees of the Company shall be forbidden to do the following:
- participate in corruption offences, whether directly or indirectly, personally or through third parties;
  - offer, promise, give bribes, solicit or receive items of commercial bribery, make payments for easing administrative, bureaucratic and other formalities in any form, including money, valuables, services or other benefits to any persons or from any persons or organizations, including commercial organizations, governmental or public authorities, Russian and foreign public officials, private companies and their representatives with the aim of receiving benefit for themselves, the Company or third parties.
- 7.5. The employees of the Company shall comply with the anti-corruption requirements and restrictions stipulated by other local regulatory and administrative documents of the Company (the Code of Corporate Ethics, etc.)
- 7.6. The employees of the Company shall inform the compliance manager of the Company on any corruption offences or non-compliance with the Anti-Corruption Policy of the Company, of which they become aware.

## **8. ANTI-CORRUPTION POLICY AND THE MANAGERS OF THE COMPANY**

- 8.1. Managers of the Company shall create the atmosphere of intolerance to any possible forms and aspects of corruption in business processes of the Company, leading by example of their adherence to fair business principles.
- 8.2. Managers of the Company shall assume liability to be guided by the below mentioned principles in their professional activities:
- compliance with the requirements of the applicable legislation of the Russian Federation, and in the absence of the applicable legislation adherence to the provisions hereof and the Code of Corporate Ethics of the Company;
  - honesty and integrity in business relations, avoidance of any unfair business operations;
  - notification of top managers of the Company about possible risks of loss and reputation risks;
  - prohibition to use the employment status, confidential information, tangible or intangible assets of the Company for personal benefit;
  - mutual assistance in important decision-makings and extraordinary situations;
  - consulting the compliance manager of the Company in case the officials have any doubts regarding correctness of their actions or doubts on ethical issues;
  - notification of the compliance manager of the company about any corruption offences or facts of non-compliance with the Anti-Corruption Policy of the Company, of which they become aware.

## **9. GIFTS AND HOSPITALITY EXPENSES**

- 9.1. The Company welcomes the development of partnership relations and admits the exchange of modest business gifts with business partners. The Company acknowledges that exchange

of business gifts and reasonable hospitality expenses is part and parcel of doing business and a standard business practice.

9.2. Adhering to the principles of business legitimacy and transparency, the Company establishes the following requirements for its employees regarding obtaining, presenting, exchanging gifts and incurring hospitality expenses:

- full compliance with the Russian anti-corruption legislation and the corresponding legislation of the country, where the exchange of business gifts takes place and hospitality expenses are incurred;
- compliance with the provisions of the Code of Corporate Ethics of the Company establishing restrictions for the exchange of business gifts.

9.3. No gifts are allowed on behalf of the Company, its employees and representatives to third parties in the monetary form, both cash and non-cash, regardless of currency and in the form of securities.

## **10. CHARITY AND SPONSORSHIP**

10.1. The Company performs charity and sponsorship activities aimed at creating the image of a socially oriented entity.

The Company does not provide any charity or sponsor support with the aim of receiving commercial benefits for its business processes.

10.2. Charity activities of the Company and implementation of corporate social responsibility projects are performed in compliance with the internal documents, regulating the Company's operations in these areas.

## **11. PARTICIPATION IN POLITICAL ACTIVITIES**

11.1. The Company does not finance any political parties and does not make any sponsor or other payments in favor of them or their regional offices.

## **12. INTERACTION WITH PUBLIC EMPLOYEES AND GOVERNMENTAL AUTHORITIES**

12.1. The Company refrains from paying any expenses for Russian and foreign public employees and their close relatives (or in their favor) for the purpose of gaining commercial benefits in specific projects of the Company, including expenses for transportation, accommodation, food, entertainment, etc.

## **13. INTERACTION WITH SUBSIDIARIES, PARTNERS AND CONTRACTORS**

13.1. The Company initiates within its competence the implementation of their own anti-corruption policies similar to this Policy in its subsidiaries and uses all reasonable endeavors to ensure compliance with the fundamental principles and requirements hereof by its partners and contractors.

The Company notifies its partners and contractors on the principles hereof prior to entering into business relations by placing the Policy publicly available.

13.2. The Company and its employees are prohibited from engaging or using intermediaries, partners, agents or other persons to perform any operations contrary to the principles and requirements of the Policy and applicable anti-corruption legislation.

- 13.3. The Company tends to develop business relations with the partners complying with the applicable anti-corruption legislation.
- 13.4. In order to fulfill the principles and requirements stipulated in the Policy, the Company suggests including anti-corruption conditions (clauses) into the contracts with the contractors of the Company. Anti-corruption conditions (clauses) shall include information on the Policy.

#### **14. CONFLICT OF INTERESTS MANAGEMENT**

- 14.1. In order to exclude the possibility of any damage to the interests of the Company, the Company takes a set of measures aimed at avoiding any conflicts of interests and precluding the possibility of obtaining any material and/or personal benefit either directly or through the intermediary due to the rights giving such possibility as a result of the use of the employment status by the Company's employees, their family members or close relatives (parents, spouses, children, brothers, sisters, as well as brothers, sisters parents, children of spouses and spouses of children).
- 14.2. Legal relationships related to the conflict of interests shall be regulated by the Code of Corporate Ethics, Regulations for managing conflicts of interests in the Company, Regulations for maintaining the register of interested parties of the Company and other organizational and administrative documents of the Company.
- 14.3. The Company tends to avoid and promptly resolve conflicts that may arise among the Company's employees.
- 14.4. Procedure for detecting and resolving conflicts of interests in the Company shall be governed by the local regulation of the Company.

#### **15. PROCEDURE FOR NOTIFICATION ON MEASURES TO PREVENT AND COMBAT CORRUPTION**

- 15.1. Continuous notification of the employees/contractors/prospective business partners of the Company on measures taken by the Company to prevent and combat corruption provides efficient functioning of the risk management and internal control system in the area of preventing and combating corruption.
- 15.2. Notification by the Company on procedures for preventing and combating corruption includes the following:
- periodical information messages from the executive bodies and heads of structural subdivisions of the Company for the employees on the issue of non-admission of corruption;
  - notification of the employees/contractors/business partners on measures taken by the Company to prevent and combat corruption;
  - timely notification of the employer by the employee on any possible/existing conflict of interests.
- 15.3. The Company may use all available communication channels to notify on measures for preventing and combating corruption, including but not limited to corporate portals; posters, leaflets, guidelines, instructions; corporate radio and TV-channels; newspapers, magazines and other news media, issued by the Company; oral communication on corporate meetings; e-mail.
- 15.4. The company may use various forms of education (including full-time and online education) in the area of preventing and combating corruption.

15.5. The Company informs contractors and business partners on measures to prevent and combat corruption according to the procedure stipulated by the internal documents of the Company.

## **16. NOTIFICATION ON VIOLATIONS**

16.1. Using available transmission facilities (telephone, e-mail), the Company receives messages from the employees of the Company, partners, contractors and other persons on possible corruption deeds, violation of the Policy, Code of Corporate Ethics by any employee of the Company.

The compliance manager considers thoroughly each message and brings the findings to the attention of top managers of the Company. In case of any evidence a respective check shall take place.

Information on available contact methods is posted on the official website of the Company, on information boards and in other public places.

16.2. In case of any doubts regarding legality of his/her actions, as well as actions, inaction or proposals of other employees, contractors or other persons cooperating with the Company, or doubts regarding compliance of those actions with the objectives, principles and requirements of this Policy, any employee of the Company or any other person may communicate about such doubts through the available transmission facilities (telephone, e-mail) either to his/her line manager or the compliance manager of the Company, who shall give recommendations and explanations with respect to the current situation.

Proposals to the top managers of the Company for the improvement of anti-corruption procedures and control may be submitted through “the Hotline”.

16.3. Procedure for notifying by the employees on any cases with signs of corruption is established by the internal documents of the Company.

16.4. In the context of the existing procedure for notification on corruption offences the Company shall guarantee the following:

- confidentiality with respect to the person, who has notified on the deed of corruption;
- no responsive measures or sanctions against the employee (including dismissal, demotion, forfeiture of bonuses) shall be taken after he/she has notified on any alleged corruption offence, or after he/she has refused to give a bribe, commercial bribe or mediate in bribery, even if such refusal had negative effect on the Company’ activities, including the loss of profits, or if the Company did not gain any commercial or competitive advantages.

16.5. Compliance by the employees of the Company with the principles and requirements of the Policy is taken into account in creating a candidate pool for promotion to higher positions and imposing disciplinary penalties.

## **17. CORRUPTION RISKS ASSESSEMENT**

17.1. The Company regularly reveals, analyzes and assesses using all available information potential external and internal corruption risks attributable to its activities in general and in specific areas.

17.2. In order to reveal and assess corruption risks the Company uses methods facilitating early recognition and accurate assessment of corruption risks.

- 17.3. The procedure for corruption risks assessment is as follows:
- division of the Company's activities into separate business processes;
  - identification of business processes and positions mostly exposed to corruption risks;
  - description of possible corruption offences;
  - registration of corruption risks;
  - integration of corruption risks into Consolidated Risk Register of the Company;
  - corruption risks mapping;
  - integration of corruption risks map into Consolidated Risk Map of the Company;
  - development of measures to mitigate and eliminate corruption risks.
- 17.4. Director General of the Company and heads of structural subdivisions who cooperate with the compliance manager on the issues of completeness of identified risks and accuracy of their assessment are responsible for the development and improvement of measures to prevent and combat corruption.
- 17.5. Information on identified risks constitutes grounds for the development of new and analysis of existing measures to prevent corruption.
- 17.6. Measures are taken for prevention and/or proper management of potential conflicts of interest, which may arise among the employees of the Company exposed to corruption risks.

## **18. LIABILITY FOR FAILURE TO COMPLY (IMPROPER COMPLIANCE) WITH THIS POLICY**

- 18.1. Director General of the Company is responsible for the organization of measures intended to implement principles and requirements of the present Policy, including the appointment of persons authorized to develop, implement and control over the anti-corruption measures.
- 18.2. Members of the Board of Directors, Director General and employees of all structural subdivisions of the Company, regardless of the position held, bear personal responsibility for the compliance with the principles and requirements of the present Policy. Heads of structural subdivisions are responsible for the compliance of their employees with this Policy.
- 18.3. Inasmuch as sanctions may be imposed against the Company for the participation of its employees, contractors and other persons dealing with the Company in any corruption activities, internal investigations shall be initiated into each reasonable allegation or established fact of corruption as legislation allows, the results of which shall be brought to the attention of Director General of the Company.
- 18.4. The Company shall reserve the right to sue a person in a civil court for breaching this Policy, if such a breach caused any damage to the Company.
- 18.5. Persons guilty of violating the requirements of this Policy may be held disciplinary, administratively, civilly or criminally liable on the initiative of the Company, law-enforcement authorities or any other persons in the manner and on the grounds set forth by the applicable anti-corruption legislation, internal regulatory documents of the Company and employment contracts.
- 18.6. According to the resolution of the management of the Company, information on any violation of this Policy may be placed publicly available (pursuant to the requirements of the privacy laws), including on the official website of the Company in the Internet, in the corporate newspaper, etc.

## **19. PUBLICITY OF ANTI-CORRUPTION POLICY OF THE COMPANY**

19.1. The Company places this Policy publicly available, openly declares on non-admission of corruption, welcomes and encourages compliance with the principles and requirements of this Policy by all contractors, its employees and other persons.