

	ABAKAN AIR LIMITED LIABILITY COMPANY	QUALITY MANAGEMENT SYSTEM
		P 05-2022/OD
REGULATION ON COMPANY'S POLICY IN THE FIELD OF COMBATING INVOLVEMENT IN CORRUPT ACTIVITIES		

APPROVED BY
GENERAL DIRECTOR

A.N. SALIEV



31, 2022

**REGULATION
ON COMPANY'S POLICY IN THE FIELD OF COMBATING
INVOLVEMENT IN CORRUPT ACTIVITIES**

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INFORMATION ON THE COPY OF THE DOCUMENT

No. 1	Control	Management body
Copy number	Status	Structural division (area of activity)
Responsible for maintenance:	<u>Lead Legal Counsel</u>	<u>D.V. Solomatin</u>
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0.4 LIST OF COPIES OF THE DOCUMENT

Copy No.	Status	Location	Responsible person
No. 1	Control	Management body Printed (paper) and electronic updated copy in PDF	Lead Legal Counsel
No. 2	Working	Human Resources Department Printed (paper) and electronic updated copy in PDF	Head of Human Resources Department
No. 3	Working	Helicopter Squadron Printed (paper) and electronic updated copy in PDF	Helicopter Squadron Specialist
No. 4	Working	Il-76 Squadron Printed (paper) and electronic updated copy in PDF	Il-76 Squadron Specialist
No. 5	Working	Cabin Crew Detachment Printed (paper) and electronic updated copy in PDF	Head of Cabin Crew Detachment
No. 6	Working	Aviation Engineering Service Printed (paper) and electronic updated copy in PDF	Assistant to Deputy General Director for Aviation Engineering Support
No. 7	Working	Transportation Management Service Printed (paper) and electronic updated copy in PDF	Head of Transportation Management Service
No. 8	Working	Department of Inspection of Flight Organisation and Safety Management Electronic updated copy in PDF	Head of Department of Inspection of Flight Organisation and Safety Management
No. 9	Working	Accounting Department Electronic updated copy in PDF	Chief Accountant
No. 10	Working	Aviation Security Electronic updated copy in PDF	Deputy General Director for Aviation Security

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1. PURPOSE OF THE DOCUMENT

1.1. This Regulation on Company's Policy in the Field of Combating Involvement in Corrupt Activities (hereinafter the "Policy") is a local regulatory document of ABAKAN AIR LLC (hereinafter the "Company"), which establishes a set of interrelated principles, procedures and specific measures in the field of combating involvement in corrupt activities and compliance with the requirements of the anti-corruption legislation of the Russian Federation, the applicable anti-corruption legislation of any other country where the Company operates or plans to operate, including the legislation of the United Kingdom and the USA, as well as defines the key principles and requirements aimed at preventing corruption from employees and other persons who may act on behalf of the Company.

1.2. The policy has been developed in accordance with the requirements of the anti-corruption legislation of the Russian Federation, the Code of Business Ethics of ABAKAN AIR LLC and the Charter of ABAKAN AIR LLC, as well as the UK Bribery Act 2010, and the US Foreign Corrupt Practices Act 1977.

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2. GOALS OF THE POLICY

2.1. The Policy reflects the commitment of the Company and its management to high ethical standards of open and honest business and formalises Company's uniform principles and approaches in the field of combating involvement in corrupt activities.

2.2. This Policy has been developed for the purpose of:

- creation among employees and management of the Company, owners of the Company, the investment community and other entities of the common understanding of the rejection of corrupt actions by the Company in any forms and manifestations at all levels of corporate governance;
- minimisation of the risk of involvement of Company's employees, regardless of their position, in corrupt activities;
- summarisation and explanation of the main requirements of the anti-corruption legislation that may apply to the Company and its employees;
- establishment of the obligation of Company's employees to know and comply with the principles and requirements of this Policy, the key provisions of the applicable anti-corruption legislation, as well as the adequate anti-corruption procedures;
- prevention and management of any conflicts of interest.

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3. SCOPE OF APPLICATION

3.1. This Policy shall be binding on:

- employees of ABAKAN AIR LLC;
- management and members of the management bodies of ABAKAN AIR LLC.

3.2. This Policy is advisory rather than mandatory for employees of affiliated companies of ABAKAN AIR LLC.

3.3. The requirements of the Policy shall become binding on the subsidiaries and affiliates of ABAKAN AIR LLC, as well as any other Company in which ABAKAN AIR LLC has a direct or indirect interest, after they are put into effect in the Company in accordance with its Charter and in the prescribed manner.

3.4. When concluding contracts with organisations that perform work/provide services for ABAKAN AIR LLC, ABAKAN AIR LLC shall include a clause on the strict compliance with the requirements and principles of the applicable anti-corruption legislation into the terms of the contracts.

3.5. All employees, management and members of the management bodies of ABAKAN AIR LLC, regardless of their position, shall be responsible for the compliance with the principles and requirements of this Policy, as well as for the actions (omission) of their subordinates, which violate these principles and requirements. This responsibility shall be recorded in official job duties of all employees, management and members of the management bodies of ABAKAN AIR LLC.

3.6. Persons who violate the requirements of this Policy may be brought to disciplinary, administrative, civil or criminal responsibility at the initiative of ABAKAN AIR LLC, law enforcement agencies or other entities in the manner and on the grounds stipulated by the legislation of the Russian Federation, local regulations and employment agreements, and, where appropriate and justified, in accordance with the applicable provisions of the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977 and other regulations of foreign countries where the Company operates or plans to operate.

3.7. Administrative, local regulatory and other internal documents of the Company shall not contradict this Policy.

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4. TERMS AND DEFINITIONS

CONNECTED PERSONS shall mean spouses, children (adult and minor), including adopted children, brothers and sisters (both full- and half-blooded), parents and adoptive parents of the Employee.

DUE DILIGENCE shall mean a principle that is based on the concepts of reasonableness and good faith, as specified in the applicable legislation, according to which the Company and its employees bear responsibility when performing business operations or making management decisions, including for obtaining, before the establishment of contractual relationship, information sufficient to form a reasonably justified opinion regarding the presence of signs of dishonesty of a counterparty or job candidate.

COUNTERPARTY shall mean any Russian or foreign legal entity or individual with whom ABAKAN AIR LLC establishes the contractual relationship, except for labour relations.

CONFLICT OF INTEREST shall mean any situations and circumstances in which the private interests of an employee or his/her connected persons and/or family members conflict or may conflict with the interests of the Company and, thus, affect or may affect the proper execution of his/her job duties, including the objective decision-making within the job duties, as well as may cause harm to the rights, legitimate interests, property and/or business reputation of ABAKAN AIR LLC.

CORPORATE COMPLIANCE SYSTEM shall mean a set of measures and actions to prevent the violations of the legislation, requirements of industry standards and regulatory documents of the Company in order to ensure the compliance with high professional and ethical standards, minimise the risks of non-compliance with the legislation and prevent significant financial losses or loss of reputation.

CORRUPT ACTIONS shall mean offering, giving, promising, soliciting or receiving bribes, mediating in bribery, making payments to simplify administrative, bureaucratic and other formalities in any form, including in the form of money, other valuables, services or providing/receiving unreasonable material or non-material benefit to any individuals/entities or from any individuals/entities, including representatives of the state, public groups, private companies and politicians.

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LOCAL REGULATORY DOCUMENT shall mean a type of the internal official document issued in the form of a set of unambiguous long-term regulations (rules) governing certain aspects of Company's business activities, which are binding on employees specified in this document. Local regulatory documents are approved by management bodies within their competence defined by the Charter, and certain types of local regulatory documents are approved by authorised representatives of the management.

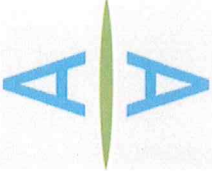
PUBLIC GROUP shall mean any form of:

- public association (national or international public organisations (including interstate and supranational), trade unions, social movements, foundations and institutions, political parties and other forms of public associations);
- non-profit organisation (associations (unions), non-profit partnerships, autonomous non-profit organisations, self-regulatory organisations and other forms of non-profit organisations).

REPRESENTATIVE OF THE STATE shall mean:

- a person performing the functions of a representative of state or municipal authorities on a permanent or temporary basis or under special authority;
- a person performing organisational or administrative functions in a state body, local self-government body, a state or municipal institution or the Armed Forces of the Russian Federation or another military formation of the Russian Federation on a permanent or temporary basis or under special authority;
- any candidate/applicant for a state or municipal position, a state or municipal service position, including a position in the Government of the Russian Federation;
- a foreign official;
- an official of international organisations.

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REPRESENTATIVE OF A PUBLIC GROUP shall mean:

- any official or employee of a public group;
- any candidate/applicant for a position in a public group.

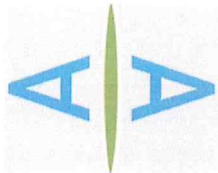
POLITICIAN shall mean a person engaged in political activities, including as a functionary of political parties.

EMPLOYEE shall mean an individual who entered into labour relations with ABAKAN AIR LLC or its Group Company.

PRIVATE INTERESTS OF THE EMPLOYEE shall mean any personal, social, property, financial, political and other interests of the employee or his/her connected persons and/or relatives.

FAMILY MEMBERS shall mean spouses, minor children, including adopted ones, of the Employee.

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5. APPLICABLE ANTI-CORRUPTION LEGISLATION

5.1. APPLICABLE LEGISLATION shall mean the provisions of the anti-corruption legislation of the Russian Federation, the UK legislation, in particular, the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977 (FCPA), and other legislative and regulatory acts of foreign states where the Company operates or plans to operate.

5.2. POLICY'S LEGAL FRAMEWORK

This Policy is based on the principles and regulations contained in the following regulatory legal documents:

- UN Convention against Corruption (adopted in New York on 31.10.2003 by Resolution 58/4 at the 51st plenary meeting of the 58th session of the UN General Assembly);
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (adopted in Istanbul on 21.11.1997);
- Convention "On Criminal Liability for Corruption" (concluded in Strasbourg on 27.01.1999 ETS No. 173);
- Criminal Code of the Russian Federation;
- Code of the Russian Federation on Administrative Offences;
- Federal Law No. 273-FZ dated 25.12.2008 "On Combating Corruption";
- Decree of the President of the Russian Federation No. 226 dated 11.04.2014 "On the National Corruption Combating Plan for 2014-2015";
- UK Bribery Act 2010;

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- Foreign Corrupt Practices Act 1977.

5.3. POLICY'S METHODOLOGICAL FRAMEWORK

The Policy's methodological framework is:

- Guidance of the UK Ministry of Justice about the development and implementation of the system of proper procedures for compliance with the provisions of the UK Bribery Act 2010;
- Resource Guide on the US Foreign Corrupt Practices Act, adopted by the US Department of Justice and the US Securities Commission on November 14, 2012;
- Transparency International 2010 UK Bribery Act Adequate Procedures Guidance on good practice procedures for corporate anti-bribery programmes;
- ICC Rules on Combating Corruption;
- Transparency International Anti-corruption Plain Language Guide 2010;
- Guidelines for Development and Adoption by Organisations of Measures to Prevent and Combat Corruption, approved by the Ministry of Labour and Social Protection of the Russian Federation on 08.11.2013.

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6. BASIC PRINCIPLES OF COMBATING INVOLVEMENT IN CORRUPT ACTIVITIES

6.1. REJECTION OF CORRUPTION IN ANY FORMS AND MANIFESTATIONS

The Company follows the principle of rejection of corruption in any forms and manifestations in the course of operating, investment and other types of activities.

The principle of rejection of corruption shall mean a strict prohibition for employees, management and members of the management bodies of ABAKAN AIR LLC and other persons acting for or on behalf of the Company, directly or indirectly, personally or through any mediation, to participate in corrupt actions, regardless of business practices in a particular country.

The Company emphasises the inadmissibility of corrupt actions, including a conflict of interest, in relation to representatives of the state, public groups, private companies, politicians and other persons, and the Company's employees through abuse of official position in order to gain any personal benefit.

In case of doubts regarding the legality of actions and compliance thereof with the requirements of this Policy, the employee shall consult the immediate supervisor or an official responsible for compliance with business ethics in the Company.

The Company shall reserve the right to make public information on the persons who violated the requirements of the applicable legislation and this Policy.

6.2. INEVITABILITY OF PUNISHMENT

The Company declares its uncompromising attitude towards any forms and manifestations of corrupt actions at all levels of corporate governance, investigates all reasonably justified reports on the violations of proper procedures of combating involvement in corrupt activities and brings the guilty persons to responsibility, regardless of their position, work period, status in the Company and other relationships with the Company in accordance with the applicable legislation.

The Company makes all possible reasonable and legal efforts to ensure the fastest and inevitable restraint of violations.

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6.3. LEGALITY

The Company strictly complies with the legislation of the Russian Federation and other countries in which the Company operates or plans to operate, and any action or omission of the Company, including in the field of combating involvement in corrupt activities, does not contradict the applicable legislation.

6.4. TOP MANAGEMENT'S ATTITUDE

The management of ABAKAN AIR LLC shall declare an uncompromising attitude towards any forms and manifestations of corruption at all levels, demonstrate, implement and follow this principle in practice.

6.5. REGULAR ASSESSMENT OF RISKS OF INVOLVEMENT IN CORRUPT ACTIVITIES

The Company carries out identification, assessment and periodic reassessment of corruption risks that are inherent of its potentially vulnerable business processes. When identifying and assessing risks, the Company takes into account the completeness of information on activities and plans, including investment and strategic ones, which are available as of the date of assessment and reassessment.

6.6. CONSISTENCY AND ADEQUACY OF GOOD PROCEDURES

The Company develops and implements the system of proper procedures of combating and preventing involvement in corrupt activities. The Company strives to make procedures as transparent, clear, practicable and reasonably compliant to the identified risks as possible.

6.7. DUE DILIGENCE PRINCIPLE

The Company checks counterparties and job candidates before making a decision on the establishment or continuation of business relations in terms of good standing, rejection of corruption and the absence of a conflict of interest.

6.8. INSTRUCTION AND TRAINING

The Company publishes this Policy in the public domain on its website and declares its rejection of corruption.

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The Company makes reasonable efforts to inform and explain the principles and regulations of the applicable legislation, the Code of Business Ethics of ABAKAN AIR LLC, this Policy and other local regulatory documents regarding combating involvement in corrupt activities, in particular, conducts training and periodic certification of all managers of ABAKAN AIR LLC, employees of the Company, as well as, where necessary and appropriate, counterparties in the basics of combating involvement in corrupt activities.

6.9. MONITORING AND CONTROL

The Company monitors the implemented proper procedures of combating and preventing involvement in corrupt activities in terms of their effectiveness and controls the compliance with such procedures.

The Deputy General Director for Quality of the Company (Quality Manager) shall supervise special inspections (investigations) of potential corporate fraud, corruption, other dishonest actions of employees of ABAKAN AIR LLC, organise control over the effectiveness of functioning of the system of notification of potential dishonest actions of Company's employees and other persons, as well as control over the implementation of measures taken by the management bodies of ABAKAN AIR LLC as part of system implementation.

6.10. IMPROVEMENT OF THE SYSTEM OF PROPER PROCEDURES

The Company encourages its employees and other stakeholders to report the suspected possible violations and non-compliance with the provisions of this Policy as soon as possible, as well as to propose recommendations and measures to improve the system of combating involvement in corrupt activities.

Reports can be provided in the following ways:

- in accordance with the fault report programme via the Security Hotline on an anonymous basis (by e-mail: solomatin@abakanair.ru or by phone: +7 985 296 00 57);
- to the immediate supervisor or superior manager.

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Employees shall inform their immediate supervisor or General Director of ABAKAN AIR LLC in writing as soon as possible on all cases of inducing them by any persons to commit corruption offences.

The Company brings the persons who have not disclosed information on cases of inducing them by any persons to commit corruption offences to responsibility in accordance with the procedure established by the applicable legislation.

The Company guarantees the confidentiality to all employees and other persons who report corruption offences.

6.11. WAIVER OF REPRISAL AND SANCTIONS

No sanctions can be applied to an employee or counterparty of the Company for:

- refusal to give or receive a bribe, carry out commercial bribery or mediate in bribery, including if such a refusal leads to the Company's losses, lost profits, non-receipt of commercial and/or competitive advantages, or
- reporting in good faith on the alleged violations, facts of corruption, other abuses or the insufficient effectiveness of the existing control procedures.

If a Company's employee or another person provides misleading information or attempts to obtain personal gain that contradicts the interests of the Company, such a person can be brought to responsibility in accordance with the applicable legislation.

6.12. INTERACTION AND COORDINATION

The Company ensures coordination of actions of all interested structural divisions, as well as interaction with state authorities, local self-government bodies, law enforcement agencies in the course of combating Company's involvement in corrupt activities.

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7. MAIN PROVISIONS OF THE PROGRAMME OF COMBATING INVOLVEMENT IN CORRUPT ACTIVITIES

7.1. GIFTS AND HOSPITALITY EXPENSES

The Company recognises the exchange of business gifts and hospitality expenses, including for business hospitality, as the necessary part of business activities and a common business practice. The Company encourages an atmosphere of honesty and transparency regarding business gifts and hospitality expenses in every possible way.

At the same time, the Company considers this area vulnerable in terms of the risk of involvement in corrupt activities, therefore, all such operations carried out for or on behalf of ABAKAN AIR LLC shall meet the following criteria:

- they fully comply with the applicable legislation, the Code of Business Ethics of ABAKAN AIR LLC and other local regulatory documents;
- they stipulate a clear business goal, are not aimed, directly or indirectly, at influencing the adoption by representatives of the state, public groups, private companies, politicians or other persons of decisions that affect the retention or expansion of the activities of ABAKAN AIR LLC;
- they do not create any obligations to the donator or organiser of business hospitality events;
- they do not create a reputational or other risk for the Company, employees and other persons in case of disclosure of information on gifts or hospitality expenses;
- they do not represent cash or non-cash money, securities, precious metals and other types or equivalents of money and/or luxury items.

All expenses for business gifts and business hospitality shall be approved by the Company's management.

The procedure for obtaining the approval for business gifts and business hospitality shall be determined by the relevant local regulatory documents of the Company.

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When doubts arise regarding the compliance of a business gift or business hospitality event with the requirements of this Policy, the employee shall consult with the immediate supervisor or write to the email address: solomatin@abakanair.ru.

7.2. CHARITY, SPONSOR AND FINANCIAL ASSISTANCE

The Company does not provide charity, sponsor and financial assistance with the direct or indirect purpose of influencing the adoption of decisions by representatives of the state, public groups or other persons that affect the retaining or expansion of the activities of ABAKAN AIR LLC, or if such assistance can be regarded as an attempt to have such an influence.

7.3. INVOLVEMENT IN POLITICAL ACTIVITIES

The Company is not involved in political activities with the direct or indirect purpose of influencing the adoption of decisions by representatives of the state, public groups, politicians or other persons that affect the retaining or expansion of the activities of ABAKAN AIR LLC, or if such involvement can be regarded as an attempt to have such an influence.

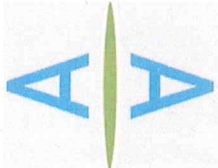
Information on the expenses for involvement in political activities is publicly available.

In accordance with the principles specified in the Code of Business Ethics of ABAKAN AIR LLC, the Company does not show preferences for any political forces or organisations and is not a sponsor of political parties. Company's employees shall always inform the management on their intention to run for political office so as to eliminate the risk of a conflict of interest.

7.4. INTERACTION WITH COUNTERPARTIES, PAYMENTS THROUGH INTERMEDIARIES AND IN FAVOUR OF OTHER ENTITIES

The Company refrains from engaging intermediaries, agents, partners, other persons acting for or on behalf of the Company, and from participating in joint ventures to perform any actions that violate the principles and requirements of this Policy, the Code of Business Ethics of ABAKAN AIR LLC or create risks, including reputational ones, for the Company, employees and other persons in case of disclosure of information on the actions committed.

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Before making a decision on the establishment or continuation of cooperation with an intermediary, agent, partner or other counterparty, or participation in a joint venture, the Company:

- collects, analyses and checks information on potential counterparties and joint venture partners, their reputation, rejection of corruption and the absence of a conflict of interest;
- carries out a preliminary check of potential counterparties (beneficiaries in the transaction) at the stage preceding the legal registration of relations, in terms of the source of funds, as well as the sending bank, jurisdiction in order to counteract the legalisation (laundering) of proceeds from crime;
- informs them on the principles and requirements of this Policy.

The Company encourages in every possible way the adoption of internal regulatory documents on combating involvement in corrupt activities, which are similar to this Policy, by joint ventures and counterparties.

When establishing contractual relationship with counterparties, the terms of the contracts shall include representations and obligations regarding the compliance with the requirements of the applicable anti-corruption legislation and this Policy, as well as the right of ABAKAN AIR LLC to conduct an audit of accounting books in order to ensure the compliance with these requirements.

The Company shall reserve the right to terminate contracts with counterparties and joint venture partners in case of detection of facts of corrupt actions on their part.

7.5. ACTIONS IN MERGER AND ACQUISITION TRANSACTIONS

When conducting merger and acquisition transactions, the Company:

- carries out due diligence (anti-corruption) inspection before/after the transaction
- voluntarily discloses the detected violations to the relevant state regulatory authorities;

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- introduces anti-corruption control mechanisms in the acquired company.

7.6. INTERACTION WITH REPRESENTATIVES OF THE STATE OR PUBLIC GROUPS

The Company refrains from paying any expenses of representatives of any state or public groups, as well as their connected persons and/or family members, or in their interests, including the receipt of material or other benefits at the expense of the Company with the direct or indirect aim of obtaining any commercial and/or competitive advantages.

7.7. ACCOUNTING

In accordance with the principles specified in the Code of Business Ethics of ABAKAN AIR LLC, the Company strictly complies with the requirements of the applicable legislation and the reporting maintenance rules. Carrying out unaccounted financial and business transactions, distortion or falsification of accounting, management and other types of accounting data or supporting documents shall be regarded as corporate fraud and investigated in accordance with the procedure established by the Company.

7.8. CONTROL AND AUDIT

The Company ensures conducting of regular external and internal audits of the internal control system, in particular, the accounting and management accounting system, as well as control over compliance with the requirements of the applicable legislation and local regulatory documents of the Company, including the principles and requirements established by this Policy, as well as the requirements of the legislation in the field of countering the legalisation (laundering) of proceeds from crime.

Since the Company can be brought to responsibility for the participation of its employees, counterparties and other persons acting for or on behalf of the Company in corrupt activities, all reasonable suspicions of corrupt actions will be thoroughly investigated in accordance with the procedure established by the Company.

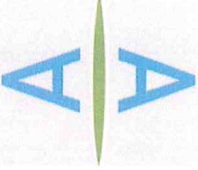
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7.9. ANTI-CORRUPTION EXPERT REVIEW

The Company ensures the anti-corruption expert review of local regulatory and administrative documents and drafts thereof in order to eliminate the risks of establishing the background for corruption offences.

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8. VALIDITY PERIOD AND AMENDMENT PROCEDURE

8.1. This Policy is a permanent local regulatory document.

8.2. If insufficiently effective provisions of this Policy or related business processes of the Company are identified, or if the requirements of the applicable legislation of the Russian Federation are changed, the General Director of the Company shall organise the development and implementation of the action plan to update this Policy and business processes.

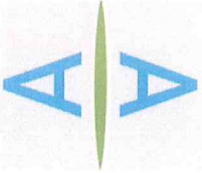
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9. REFERENCES

- UN Convention against Corruption (adopted in New York on 31.10.2003 by Resolution 58/4 at the 51st plenary meeting of the 58th session of the UN General Assembly), ratified by Federal Law No. 40-FZ dated 08.03.2006 “On the Ratification of the United Nations Convention against Corruption”).
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (adopted in Istanbul on 21.11.1997). The Russian Federation acceded to the Convention – Federal Law No. 3-FZ dated 01.02.2012 “On Russia’s Accession to the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions”).
- Convention “On Criminal Liability for Corruption” (concluded in Strasbourg on 27.01.1999 ETS No. 173), ratified by Federal Law of the Russian Federation No. 125-FZ dated 25.07.2006 “On the Ratification of the Convention on Criminal Liability for Corruption”.
- Code of the Russian Federation on Administrative Offences No. 195-FZ dated 30.12.2001.
- Criminal Code of the Russian Federation No. 63-FZ dated 13.06.1996.
- Federal Law No. 40-FZ dated 08.03.2006 “On the Ratification of the United Nations Convention against Corruption”.
- Federal Law No. 3-FZ dated 01.02.2012 “On Russia’s Accession to the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions”.
- Federal Law No. 125-FZ dated 25.07.2006 “On the Ratification of the Convention on Criminal Liability for Corruption”.
- Federal Law No. 115-FZ dated 07.08.2001 “On Countering the Legalisation (Laundering) of Criminally Obtained Incomes and the Financing of Terrorism”; (adopted in connection with the UN Convention against Transnational Organised Crime 2000, the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism).
- Federal Law No. 273-FZ dated 25.12.2008 “On Combating Corruption”.
- Decree of the President of the Russian Federation No. 478 dated 16.08.2021 “On the National Anti-Corruption Plan for 2021-2024”.

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- Guidelines for Development and Adoption by Organisations of Measures to Prevent and Combat Corruption, approved by the Ministry of Labour and Social Protection of the Russian Federation on 08.11.2013.
- The UK Bribery Act 2010, approved by the UK Parliament and Queen Elizabeth II on 08.04.2010 and put into effect on 01.07.2011.
- The US Foreign Corrupt Practices Act 1977 (FCPA).

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