

**ANTI-CORRUPTION POLICY STATEMENT
AND INTERNAL CONTROL**

in NEWMEDTECH LLC

Moscow

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1. INTRODUCTION

1.1. The anti-corruption policy of NewMedTech LLC was developed and adopted in pursuance of subparagraph “b” of paragraph 25 of the Decree of the President of the Russian Federation of April 2, 2013 N 309 “On measures to implement certain provisions of the Federal Law “On Combating Corruption” and in accordance with Article 13.3 of the Federal Law of December 25, 2008 N 273-FZ “On Combating Corruption” in accordance with the Methodological Instructions of the Ministry of Labour of the Russian Federation of 08.11.2013.

This Anti-Corruption Policy of NewMedTech LLC (hereinafter referred to as the “Anti-Corruption Policy”) reflects the adherence of NewMedTech LLC (hereinafter referred to as the “Company”) and its management to high ethical standards of conducting an open and honest business to improve corporate culture, adhere to the best corporate governance practices and maintain a business reputation of the Company, and also defines key principles and requirements aimed at preventing corruption and being in compliance with applicable anti-corruption laws by the Company, members of its management bodies, employees and other persons who may act on behalf of the Company.

The anti-corruption policy is a local regulatory act of NewMedTech LLC (hereinafter referred to as the “Company”), developed and adopted in accordance with anti-corruption legislation, as well as the Charter and other internal documents of the Company.

A policy is a documented procedure for a quality management system.

The requirements of the Anti-Corruption Policy are mandatory for all employees of the Company, its representatives, as well as for other persons, in cases where the relevant obligations are formalized in contracts therewith.

The Policy comes into force from the moment of its approval by the General Director and is valid until the introduction of the new Anti-Corruption Policy. Changes to the current policy are made by the Company’s order.

1.2. The Company’s anti-corruption measures are aimed at:

- prevention of corruption including the identification and subsequent elimination of the causes of corruption (prevention of corruption) including cooperation of the company with law enforcement agencies,
- identification, prevention, suppression, disclosure, and internal investigation of corruption manifestations (combating corruption),
- minimization and (or) elimination of the consequences of corruption manifestations (offenses),

- development and implementation into practice of standards and procedures aimed at ensuring the conscientious work of the company,
- adoption of a code of ethics and official conduct of the Company's employees,
- prevention and settlement of conflicts of interest,
- prevention of unofficial reporting and use of forged documents.

This policy uses references to the following regulatory documents:

- The Criminal Code of the Russian Federation
- Federal Law of 30.12.2001 No. 195-FZ "Code of the Russian Federation on Administrative Offenses"
- Federal Law of 25.12.2008 No. 273-FZ "On Combating Corruption"
- Decree of the President of the Russian Federation of April 2, 2013 N 309 "On measures to implement certain provisions of the Federal Law "On Combating Corruption".

2. GENERAL PROVISIONS

2.1. The Company's anti-corruption policy is a basic document that defines the main tasks, principles and directions of anti-corruption activities, the purpose of which is to coordinate the activities of the Company's employees in the implementation of anti-corruption measures aimed at preventing, detecting, and suppressing corruption in the Company.

2.2. This document defines:

- goal and objectives of the Company's Anti-Corruption Policy,
- principles of the Company's Anti-Corruption Policy,
- structure of management of the Company's anti-corruption activities,
- main directions of the Company's Anti-Corruption Policy,
- main measures for the prevention of corruption, legal education, and the development of law-abiding behaviour of the Company's employees.

2.3. The Company's anti-corruption policy is intended to be used for adherence to compliance provisions of the applicable anti-corruption legislation.

2.4. The anti-corruption policy of the Company applies to contractors and representatives of the Company, as well as to other persons, when the corresponding obligations are enshrined in agreements with them.

2.5. The anti-corruption policy has been developed in accordance with the current legislation of the Russian Federation, the Charter, and other internal documents of the Company.

2.6. All employees of the Company shall be guided by this Policy and strictly abide by its principles and requirements.

2.7. The responsibility for the organization and efficiency of all measures aimed at implementing the principles and requirements of this Anti-Corruption Policy including the appointment of persons responsible for the development of anti-corruption procedures, implementation and control thereof, shall be attached to the General Director of the Company.

2.8. The General Director approves this Anti-Corruption Policy of the Company, reviews and approves amendments and additions to it, controls the overall results of the implementation and application of the Anti-Corruption Policy of the Company. If insufficient effective provisions of this Anti-Corruption Policy or related anti-corruption procedures are detected, or when the requirements of the applicable anti-corruption legislation of the Russian Federation or other states change, the General Director will organize the development and implementation of an action plan to revise and amend this Policy and/or anti-corruption procedures.

3. TERMS AND DEFINITIONS

3.1. Terms and Definitions:

Corruption means abuse of office, giving a bribe, accepting a bribe, abuse of authority, commercial bribery, or other illegal use by an individual of its official position contrary to the legitimate interests of society and the state to obtain benefits in the form of money, valuables, other property, or property-related services, etc. property rights for oneself or for third parties, or illegal provision of such benefits to the specified person by other individuals. Corruption also means to commit the listed acts on behalf of or in the interests of a legal entity (par. 1 of Article 1 of Federal Law No. 273-FZ of December 25, 2008 “On Combating Corruption”).

Anti-Corruption means activities of federal government bodies, government bodies of the constituent entities of the Russian Federation, local government bodies, civil society institutions, organizations, and individuals within their powers (par. 2 of Article 1 of the Federal Law of December 25, 2008 N 273-FZ “On Combating Corruption”):

a) to prevent corruption including the identification and subsequent elimination of the causes of corruption (prevention of corruption),

b) to identify, prevent, suppress, disclose and investigate corruption offenses (fight against corruption),

c) to minimize and (or) eliminate the consequences of corruption offenses.

Organization means a legal entity, regardless of the form of ownership, organizational and legal form, and industry affiliation.

Counterparty means any Russian or foreign legal or natural person with whom the organization enters into contractual relations, with the exception of labour relations.

Bribe means receipt by an official, a foreign official or an official of a public international organization personally or through an intermediary of money, securities, other property, or in the form of illegal provision of property-related services, provision of other property rights for committing actions (inaction) in favour of the bribe-giver or the persons represented by him/her, if such actions (inaction) are included in the official powers of the official or if, by virtue of his/her official position, he/she can contribute to such actions (inaction), as well as for general patronage or connivance in office.

Commercial bribery means illegal transfer of money, securities, other property to a person performing managerial functions in a commercial or other organization, the provision of property services to him/her, the provision of other property rights for actions (inaction) in the interests of the giver in connection with the office (position) of this person (part 1 of Article 204 of the Criminal Code of the Russian Federation).

Conflict of interest means a situation in which personal interest (direct or indirect) of an employee (representative of the organization) affects or may affect the proper performance of his/her job (labour) duties and in which a contradiction arises or may arise between personal interest of an employee (a representative of the organization) and the rights and legitimate interests of the organization, which can inflict harm to the rights and legitimate interests, property and (or) business reputation of the organization of which he/she is an employee (a representative of the organization).

Personal interest of an employee (a representative of an organization) means interest of an employee (a representative of an organization) associated with the possibility of an employee (a representative of an organization) receiving income in the form of money, valuables, other property or property-related services, other property rights for himself/herself or for other persons.

Abuse of powers (Article 201 of the Criminal Code of the Russian Federation) means the use by a person performing managerial functions in a commercial or other type of organization of his/her powers contrary to the legitimate interests of

this organization and in order to derive profit and advantages for themselves or others, or harm others, if the act entailed causing substantial harm to the rights and legitimate interests of citizens or organizations, or the interests of society or the state protected by law.

Corruption manifestations mean actions (inaction) of the Company's employees that contain signs of corruption or encourage a crime.

Illegal remuneration on behalf of a legal entity (Article 19.28 of the Code of Administrative Offenses of the Russian Federation) means illegal transfer, offer or promise on behalf of or in the interests of a legal entity to an official, a person performing managerial functions in a commercial or other organization, a foreign official or an official of a public international organization of money, securities, other property, the rendering of property-related services, the provision of property rights for the commission in the interests of this legal entity by an official, a person performing managerial functions in a commercial or other organization, a foreign official or an official of a public international organization actions (inaction) related to their official position.

Illegal recruitment to work or to the performance of work or the provision of services of a state or municipal employee or a former state or municipal employee (Article 19.29 of the Code of Administrative Offenses of the Russian Federation) means the involvement of the Company in labour activities under the terms of an employment contract or to perform work or render services under a civil contract of a state or municipal employee acting in a position included in the list established by regulatory legal acts, or a former state or municipal employee who held such office, in violation of the requirements provided for by Federal Law No. 273-FZ of December 25, 2008 "On Combating Corruption".

4. APPLICABLE ANTI-CORRUPTION LAW

4.1. Russian anti-corruption legislation: the Company and all employees of the Company must comply with the regulations of the Russian anti-corruption legislation, established, inter alia, by the Criminal Code of the Russian Federation, the Code of Administrative Offenses of the Russian Federation, Federal Law "On Combating Corruption" and other regulations, the main requirements of which are prohibition of the following acts:

- Corruption
- Abuse of official position
- Giving a bribe
- Taking a bribe
- Mediation in bribery

- Abuse of authority
- Commercial bribery
- Illegal remuneration on behalf of the Company
- Illegal recruitment to work or to perform work or render services to a state or municipal employee or a former state or municipal employee.

5. GOALS AND OBJECTIVES OF ANTI-CORRUPTION POLICY

5.1. The purpose of the Anti-Corruption Policy is the development and implementation of versatile and consistent measures to prevent, eliminate (minimize) the causes and conditions that give rise to corruption, form an anti-corruption consciousness characterized by intolerance of the Company's employees, customers, contractors, and management bodies to corruption.

5.2. The objectives of the Company's Anti-Corruption Policy are:

- organizing among clients, contractors, management bodies, employees of a uniform understanding of the Company's position on the rejection of corruption in any form and manifestation,
- minimizing the risk of involvement of the Company and its employees, regardless of the position held, in corrupt activities,
- prevention of corruption manifestations and ensuring accountability for corruption manifestations,
- compensation for harm caused by corruption,
- creation of anti-corruption corporate consciousness,
- creation of a legal mechanism preventing bribery of all and any persons described in the Anti-Corruption Policy,
- establishing the obligation of the Company's employees to know and comply with the principles and requirements of this Policy, key regulations of the applicable anti-corruption legislation,
- creating incentives for incorruptible persons to fill positions in the Company.

6. PRINCIPLES OF ANTI-CORRUPTION POLICY OF THE COMPANY

6.1. The key principles of the Company's Anti-Corruption Policy are:

- The principle of compliance of the Company's Anti-Corruption Policy with the current legislation of the Russian Federation and generally accepted standards.

Compliance of the implemented anti-corruption measures with the Constitution of the Russian Federation, international treaties concluded by the Russian Federation, the legislation of the Russian Federation and other regulatory legal acts applicable to the company.

- The principle of personal leadership example. The key role of the Company's management in fostering a culture of intolerance to corruption and in creating an internal system for preventing and combating corruption.
- The principle of employee involvement. Awareness of the Company's employees about the provisions of the anti-corruption legislation of the Russian Federation and their active participation in organizing and implementation of anti-corruption standards and procedures.
- The principle of proportionality of anti-corruption procedures to the risk of corruption. The development and implementation of a number of measures to reduce the likelihood of involvement of the Company, its managers and employees in corruption activities is carried out considering the corruption risks existing in the activities of this company.
- The principle of the effectiveness of anti-corruption procedures. The use in the Company of such anti-corruption measures that are of low cost, ensure ease of implementation and bring significant results.
- The principle of responsibility and inevitability of punishment. The inevitability of punishment for the employees of the Company, regardless of the position held, length of service and other conditions if they commit corruption offenses in connection with the performance of their work duties, as well as the personal responsibility of the Company's management for the implementation of the internal anti-corruption policy.
- The principle of business openness. Informing contractors, partners and the public about the anti-corruption business standards adopted by the Company.
- The principle of constant control and continuous monitoring. On-going monitoring of the effectiveness of the implemented anti-corruption standards and procedures, as well as control over the implementation thereof.

7. DIRECTIONS OF THE COMPANY'S ANTI-CORRUPTION POLICY

7.1. Prohibition of Corruption

7.1.1. Employees of the Company are strictly prohibited, directly or indirectly, personally or through the mediation of third parties, to participate in corrupt practices, offer, give, promise, ask for and receive bribes or make payments to

facilitate administrative, bureaucratic and other procedures in any form including in the form of funds, valuables, services or other benefits, to any persons and from any persons or organizations including commercial organizations, authorities and local governments, government officials, employees of public medical companies, as well as private companies and their representatives for the benefit of the Company.

7.2. Adequate Anti-corruption Procedures

7.2.1. The company develops and implements adequate procedures for the prevention of corruption, which reasonably meet the identified risks, and monitors the compliance thereof.

7.3. Mission of the Company`s Management

7.3.1. Company officials shall establish an ethical standard for an irreconcilable attitude towards any form and manifestation of corruption at all levels, setting an example by their behaviour and carrying out familiarization with the Anti-Corruption Policy of all employees and contractors.

7.3.2. The Company establishes the principle of rejection of corruption in any form and manifestation (the principle of “zero tolerance”) in the implementation of daily activities and strategic projects including in interaction with shareholders, investors, contractors, representatives of government bodies, self-regulating companies, political parties, its employees, and other persons.

7.3.3. Company officials shall strictly observe the following principles in their professional activities:

- to comply with the requirements of the current legislation of the Russian Federation, other legal regulations in full, and in the absence of applicable legislation, proceed from the requirements of good faith, reasonableness, fairness and the provisions of this Anti-Corruption Policy,
- to be honest and decent in business dealings, refrain from any unfair ways of doing business,
- to respect the right to property, strive for a balance of mutual benefits when making transactions,
- in the event of a risk of loss or reputational risks for the Company, to immediately notify the top management of the Company,
- not to use official position, confidential information, tangible, and intangible assets of the Company for personal purposes,
- to provide mutual assistance in making important decisions and in emergency situations,

- in professional activity, not to allow illegal actions, or actions that may raise suspicions about their legitimacy and ethics,
- to refrain from unethical competitive practices,
- to refrain from action or inaction that gives rise to conflicts in business relations, strive to resolve conflicts that have arisen on the basis of a balance of interests of participants in business relations,
- if officials have doubts about the correctness of their actions or doubts about any other ethical issues, they should seek clarification from the person responsible for compliance with the Anti-Corruption Policy. This person is appointed in accordance with the internal documents of the Company,
- to inform the person responsible for compliance with the Anti-Corruption Policy of any positions held by them outside and without the knowledge of the Company, the performance of their duties creates a conflict of interest for them with the interests of the Company, and before agreeing to take such positions, they must notify the person, responsible for compliance with anti-corruption policies, about their intentions.

7.4. Obligations of the Company`s Employees shall:

- refrain from committing and (or) participating in committing corruption offenses in the interests of or on behalf of the Company,
- refrain from behavior that can be interpreted by others as a willingness to commit or participate in a corruption offense in the interests or on behalf of the Company,
- without delay inform the immediate manager / person responsible for compliance with the Anti-Corruption Policy/the Company`s management about cases of persuading an employee to commit corruption offenses,
- immediately inform the immediate manager / person responsible for compliance with the Anti-Corruption Policy / management of the Company about information that has become known to an employee about cases of corruption offenses by other employees, contractors of the Company or other persons,
- inform the immediate supervisor or other responsible person about the possibility of a conflict of interest or the existing conflict of interest for an employee.

7.5. On-Going Risk Assessment

7.5.1. The Company on an on-going basis identifies, considers, and evaluates the possibility of corruption risks specific to its activities.

7.6. Resolution of complaints from employees of the Company, contractors and other bodies (individuals and legal entities) about the facts of corruption

7.6.1. The Company declares transparency in combating corruption.

7.6.2. The Company accepts complaints about the facts of corruption using an interactive channel for applicants (website, mail including e-mail, sent to info@nmtg.ru and postal addresses of the Company, as well as in person).

7.6.3. The Company is guided by the principles of an effective system for considering and resolving complaints about facts of corruption in the Company, preparing responses within the time limits established by the legislation of the Russian Federation and the internal regulations of the Company.

7.7. Conflict of Interest Management

7.7.1. The Company declares the implementation of measures to comply with corporate ethics (compliance with the Code of Corporate Ethics), corporate conduct standards, compliance with internal documents regulating cases of conflict of interest, as well as measures aimed at controlling such cases.

7.7.2. The Company implements measures to prevent the occurrence of a conflict of interest, which are aimed at eliminating the possibility, including personally or through an intermediary, of material and (or) personal benefits due to the presence of employees of the Company, or their family members, or persons in a relationship with them, close relationship or family (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children), rights that provide such an opportunity because of their use of their official position.

7.7.3. The Company strives to prevent and timely resolve pre-conflict situations among the Company's employees.

7.7.4. The Company adheres to the following principles of conflict-of-interest management:

- the obligation to disclose information about a real or potential conflict of interest,
- individual consideration and assessment of reputational risks for the Company when each conflict of interest is identified and its further settlement,
- confidentiality of the process of disclosing information about a conflict of interest and the process of its settlement,
- maintaining the balance of interests of the Company and an employee when resolving conflicts of interest,
- protection of the employee from harassment in connection with reporting a conflict of interest, which was disclosed by an employee in a timely manner and settled (prevented) by the Company.

7.8. Anti-Corruption Measures

The company plans to carry out the following anti-corruption measures to prevent and combat corruption:

7.8.1. Regulatory support, encouragement of standards of conduct and declaration of intent:

- development and adoption of a code of professional ethics for employees of the Company,
- development and adoption of rules governing the exchange of gifts,
- introduction of a standard anti-corruption clause into contracts related to the Company's business activities,
- familiarization with this anti-corruption policy before signing an employment contract with employees.

7.8.2. Development and introduction of special anti-corruption procedures:

- introduction of a procedure for informing the Company's employees about cases of inciting them to commit corruption offenses and the procedure for considering such messages,
- introduction of a procedure for informing the Company about information that has become known to an employee about cases of corruption offenses by other employees, contractors of the Company or other persons and the procedure for considering such messages,
- introduction of a procedure for informing the Company's employees about a conflict of interest and a procedure for resolving the identified conflict of interest,
- introduction of procedures to protect employees who have reported corruption offenses in the activities of the Company from formal and informal sanctions,
- conducting an on-going assessment of corruption risks to identify the areas of the Company's activities that are most exposed to such risks and develop appropriate anti-corruption measures.

7.8.3. Training and informing the Company's employees:

- familiarization of employees, against signature, with the regulations governing the issues of preventing and combating corruption in the Company,
- conducting training events on prevention and combating corruption including with the participation of partner companies,
- organization of individual counseling for employees on the application (compliance) of anti-corruption standards and procedures.

7.8.4. Ensuring the compliance of the Company's internal control system with the requirements of the Company's Anti-Corruption Policy:

- implementation of regular monitoring of compliance with internal procedures,
- implementation of regular control of accounting data, availability and reliability of primary accounting documents,
- regular monitoring of the economic feasibility of expenses in areas with a high corruption risk: exchange of gifts, hospitality expenses, charitable donations, remuneration for external consultants.

7.9. Interaction with Contractors

7.9.1. The Company chooses large contractors to provide it with works and services based on a tender (bid), the main principles of which is the selection of a contractor at the best competitive prices, which ensures:

- market analysis of offered services,
- equality, fairness, absence of discrimination and unreasonable restrictions on competition in relation to contractors,
- honest and reasonable selection of the most preferred offers with a comprehensive analysis of benefits and costs (primarily the price and quality of products),
- targeted and cost-effective spending of funds for the purchase of goods, works, services (considering, if necessary, the cost, life cycle of purchased products) and the implementation of measures aimed at reducing the Company's costs,
- no limitation of admission to participation in a tender by establishing excessive requirements for a contractor,
- prevention of corruption, conflicts of interest and other abuse of authority.

7.9.2. The Company seeks to do business with contractors that support the requirements of anti-corruption laws and / or contractors that declare non-acceptance of corruption.

7.9.3. The Company declares that it refuses to stimulate in any way the employees of contractors including by providing sums of money, gifts, gratuitous performance of work (services) to them and other methods not enumerated herein, which puts an employee of a contractor in a certain dependence and aimed at ensuring that this employee performs any or all actions in favour of the Company.

7.9.4. The Company makes reasonable efforts to minimize the risk of business relationships with contractors that may be involved in corrupt activities, and in this respect the contractors' tolerance for bribery is checked including checking

whether they have their own anti-corruption procedures or policies, their readiness to comply with the requirements of this Policy, and include anti-corruption clauses (clauses) in contracts, and provide mutual assistance for ethical business conduct and prevention of corruption.

7.10. Gifts and Hospitality

7.10.1. The company encourages the development of partnerships with external clients and contractors and allows the exchange of modest corporate gifts between partner parties.

7.10.2. The Company allows employees of the Company to receive and donate gifts from customers/contractors with an approximate value of not more than three thousand Russian rubles, unless otherwise provided by a special internal order of the General Director.

7.10.3. If the receipt of a gift involves the provision of any benefits, preferences, etc. to a client (contractor), the employee as early as possible notifies his immediate supervisor, as well as the person responsible for compliance with the Anti-Corruption Policy.

7.10.4. The Company employees can make gifts to their clients in accordance with the procedure for spending funds established in the Company.

7.10.5. Gifts to the clients of the Company are made only if there are no prohibitive rules in the Client's Company regarding acceptance of gifts.

7.10.6. Cash gifts are prohibited.

7.10.7. Attending a cultural or sports event or restaurant with a business partner is allowed. Employees must either reject offers of expensive (over 3,000 rubles) or private entertainment or pay for them from their own funds. Employees may invite other people to various events if it is legal and reasonable in the business context.

7.10.8. Tickets for sports and other events (received and intended for donation) for more than three thousand Russian rubles, unless otherwise provided by a special internal order of the General Director of the Company, must be previously agreed with the management of the Company.

Gifts and entertainment expenses related to business hospitality that employees on behalf of the Company may make to other persons and organizations, or which employees, in connection with their work in the Company, may receive from other persons and organizations, must meet the following criteria:

- be directly related to the legitimate goals of the Company, for example, with the presentation or completion of business projects, the successful execution of contracts, or with national holidays, the birthday of the Company,

- not represent a hidden reward for a service, action, inaction, connivance, patronage, granting rights, making a certain decision on a transaction, agreement, permission, etc. or an attempt to influence the recipient for another illegal or unethical purpose,
- not create reputational risks for the Company, its employees and other persons in the event of disclosure of information about donation or entertainment expenses,
- not contradict the principles and requirements of this Policy and other internal documents of the Company, the regulations of the legislation of the Russian Federation.

Donations on behalf of the Company, its employees, and representatives to third parties in the form of monetary funds, both cash and non-cash, in any currency are not allowed.

Souvenirs (low-cost products) with the Company's logo provided at exhibitions, open presentations, forums, and other marketing events, in which the Company officially participates are allowed and considered as image or information materials.

7.11. Participation in Charity Activities and Sponsorship

7.11.1. The Company intends to implement a unified charitable policy aimed at creating the Company's image as a socially responsible business.

7.11.2. The Company does not finance charity and sponsorship projects to obtain commercial advantages in specific projects of the Company.

7.12. Participation in Political Activities

7.12.1. The Company shall not independently or through its employees finance political parties, public associations to obtain or maintain an advantage in commercial activities.

7.12.2. The employees of the Company have the right on their own behalf to participate in public associations, such as political parties, public organizations, social movements, public funds, and other non-profit organizations established in accordance with the current legislation of the Russian Federation, as well as in international public associations whose purpose is not obtaining or retaining the Company's advantage in commercial activities.

7.12.3. Employees of the Company, when participating in public associations, are prohibited from offering, giving, promising, or making payments, depositing property, giving gifts, etc. on behalf of the Company to obtain or maintain an advantage for the Company in commercial activities.

7.12.4. The Company's employees are independently responsible in accordance with the current legislation of the Russian Federation for participation in public organizations.

7.13. Interaction with Government Officials

The Company shall not pay, independently or through its employees, any expenses (monetary remuneration, loans, services, payment for entertainment, recreation, transport costs and other remuneration) for government employees and their close relatives (or in their interests) to obtain or maintain an advantage for Companies in commercial activities.

7.13.1. Interaction with government officials on behalf of the Company is carried out through a person responsible for compliance with the Company's Anti-Corruption Policy and must be previously approved by such a person.

7.13.2. The provision of gifts to government officials shall not violate the requirements of the Anti-Corruption Policy and the legislation of the Russian Federation.

7.13.3. The employees of the Company are independently liable for manifestations of corruption during independent interaction with government officials in accordance with the current legislation of the Russian Federation.

7.14. Payments through Intermediaries or in favour of Third Parties

7.14.1. The Company and its employees are prohibited from engaging or using intermediaries, partners, agents, joint ventures, or other persons to perform any actions that contradict the principles and requirements of the Company's Anti-Corruption Policy or the applicable anti-corruption legislation of the Russian Federation.

7.14.2. The Company ensures that procedures are in place to check intermediaries, partners, contractors, and other persons to prevent and/or detect the violations described above in order to minimize and suppress the risks of the Company's involvement in corruption activities.

7.15. Keeping Books and Records

7.15.1. All financial transactions of the Company must be accurately, correctly and with a sufficient level of detail reflected in the accounting of the Company, documented and available for verification.

7.15.2. The Company has appointed employees who are responsible under the current legislation of the Russian Federation for the preparation and submission of complete and reliable financial statements in a timely manner.

7.15.3. Distortion or falsification of the Company's financial statements is prohibited in accordance with the current legislation of the Russian Federation.

7.16. Preventing Corruption

The Company carries out information and consulting work, which includes informing the Company's employees about the anti-corruption legislation, the measures taken by the Company for these purposes, as well as the provisions and requirements of this Anti-Corruption Policy.

7.16.1. The Company conducts induction training for all newly hired employees of the Company in terms of the applicable number of measures and requirements of anti-corruption legislation and internal documents of the Company.

7.16.2. The Company declares that no employee will be subject to sanctions (including fired, demoted, deprived of bonuses) if he or she has reported an alleged corruption in accordance with the requirements of this Anti-Corruption Policy, or if he refused to give a bribe, commit commercial bribery, or mediate in bribery, even if because of such refusal, the Company has, inter alia, lost profits or has not obtained commercial and competitive advantages.

7.16.3. The Company requires its employees to comply with the Company's Anti-Corruption Policy, informing them of the key principles, requirements, and sanctions for violations. All employees of the Company must be guided by the Company's Anti-Corruption Policy and strictly abide by its principles and requirements. Each employee of the Company must sign a commitment to comply with the principles and requirements of the Company's Anti-Corruption Policy and anti-corruption legislation when concluding an employment contract.

7.16.4. Any employee in the event of doubts about the legitimacy or compliance with the goals, principles, and requirements of the Anti-Corruption Policy of his/her actions, as well as actions, inaction or proposals of other employees, contractors or other persons who interact with the Company, must inform his/her immediate supervisor and/or an authorized person who, if necessary, will provide recommendations and clarifications regarding the situation.

7.16.5. Due to possible changes in corruption risks and other factors affecting business activities over time, the Company monitors the implemented adequate procedures to prevent corruption, controls the observance thereof, and, if necessary, revises and improves them.

7.17. Information

The Company publishes this Anti-Corruption Policy in the public domain on the corporate website on the Internet, openly declares its rejection of corruption, welcomes, and encourages compliance with the principles and requirements of the

Anti-Corruption Policy by all contractors, its employees, members of management bodies, and other persons.

8. LIABILITY

8.1. The General Director and employees of all structural divisions of the Company, regardless of their position, shall be responsible for compliance with the principles and requirements of the Company's Anti-Corruption Policy, as well as for the actions (inaction) of their subordinates that violate these principles and requirements.

8.2. The measures of responsibility for manifestations of corruption in the Company include measures of criminal, administrative and disciplinary liability in accordance with the legislation of the Russian Federation and measures of corporate influence in accordance with the legal regulations of the Company.

8.3. The Company has the right to conduct official checks on every reasonable suspicion or established fact of corruption within the framework permitted by the legislation of the Russian Federation.

9. AUDIT AND CONTROL

9.1. The Company regularly conducts an external audit of financial and economic activities, control over the completeness and correctness of data reflection in accounting and compliance with the requirements of the legislation of the Russian Federation and internal documents governing the Company's activities including the principles and requirements established by this Policy.

10. CHANGES

10.1. If insufficiently effective provisions of the Company's Anti-Corruption Policy or changes in the requirements of the applicable legislation of the Russian Federation are discovered, the Company ensures the development and implementation of an action plan to update the Company's Anti-Corruption Policy.