

**Corruption Combating Policy**

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**Corporate policy**

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## Corruption Combating Policy

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## Corruption Combating Policy

### 1. Purpose and Scope

- 1.1. This Corruption Combating Policy (hereinafter referred to as the “Policy”) defines the main goals and principles, and areas of activities of Siberian Coal Energy Company Joint Stock Company (hereinafter referred to as the “Company”) in combating corruption, bribery and money laundering. In its activities, the Company follows the goals and principles of this Policy in order to prevent unfair competition and ensure conditions for stable and efficient business organization.
- 1.2. This Policy governs compliance with rules of business conduct that help eliminate and prevent corruption, and dissemination of these rules in business practice of the Company.
- 1.3. This Policy covers all employees of the Company, both full-time and part-time, regardless of their position, length of service, working conditions and other circumstances.
- 1.4. Organizational, administrative and local regulations of the Company should not contradict this Policy.
- 1.5. The Policy is a publicly available document that may be provided to stakeholders without restrictions. The Policy is brought to notice of all employees of the Company and placed on internal and external electronic resources of the Company.
- 1.6. The Company, within its competence, initiates introduction in the Company’s subsidiaries of their own corruption combating policies similar to this Policy, and makes reasonable efforts to ensure that the Company’s subsidiaries and their counterparties comply with the basic principles and requirements of this Policy.
- 1.7. This Policy is valid for three years, or until a change in laws before expiration of this period that affects provisions of the Policy.

### 2. Terms and Definitions

2.1. The following terms and abbreviations are used in this Policy:

- 2.1.1. “**Asset**” is an independent business or a share in an independent business in the form of participation in capital of a legal entity or in the form of property complex which has independent, unified and indivisible economic purpose.
- 2.1.2. “**Bribery**” is a type of corrupt conduct in the form of offer, promise, giving of a bribe, demand, consent to receive, receipt of a bribe, mediation and other similar actions in accordance with applicable laws.

Varieties of bribery:

- receipt of a bribe (article 290 of the Criminal Code of the Russian Federation);
- giving of a bribe (article 291 of the Criminal Code of the Russian Federation);
- mediation in bribery (article 291.1 of the Criminal Code of the Russian Federation);
- petty bribery (article 291.2 of the Criminal Code of the Russian Federation).

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A bribe can be classified in several ways:

- by the way of giving: veiled or apparent. The first one is given under the guise of a loan or a gift for some event. The second one is openly given for specific things that are expressly specified beforehand;
- by the nature of actions: graft (for proper behavior) and extortion (for deviation from norms);
- by the time of receipt: gratitude (which is transferred after completion of already specified actions or omission) and subornation (which is carried out beforehand).

- 2.1.3. **“Commercial Subornation”** is illegal transfer of money, securities, other property to a person performing managerial functions in a business or other entity, and illegal provision of property services to such person, provision of other property rights (in particular, when the subornation is transferred or provided to another individual or legal person on instruction of such person) for taking (omission of) actions in the interests of the giver or other persons if the above actions (omission) are within job duties of such person, or if such person can contribute to the above actions (omission) by virtue of the position held by such person;
- 2.1.4. **“Company’s Subsidiaries”** are legal entities established in accordance with laws of the Russian Federation, in which the Company can determine decisions taken by such legal entities, by virtue of the Company’s predominant participation in their authorized capital, or in accordance with agreement between them, or otherwise;
- 2.1.5. **“Compliance Unit”** is a structural unit of the Company that carries out compliance functions in accordance with approved unit regulations;
- 2.1.6. **“Counterparty”** an individual or a legal entity with whom the Company enters into civil relations in the process of entering into and performing agreements;
- 2.1.7. **“Conflict of Interest”** is a situation where personal interest (direct or indirect) of an employee affects or can affect proper, objective and impartial performance of such employee’s job duties by such employee, and where conflict arises or may arise between personal interest of the employee and rights and legitimate interests of the Company which can harm rights and legitimate interests, property and (or) business reputation of the Company;
- 2.1.8. **“Corruption”** is abuse of official position, giving bribe, receiving bribe, abuse of powers, commercial bribery or other illegal use by individual of his official position contrary to legitimate interests of the company and the state to obtain benefits in the form of money, valuables, other property or property services, other property rights for themselves or for third parties or illegal provision of such benefits to the person above by other individuals, including commission of the above actions on behalf of or in the interests of a legal entity;
- 2.1.9. **“Legalization (Laundering) of Proceeds from Crime”** is imparting a legal form to possession, use or disposal of funds or other property obtained from crime;
- 2.1.10. **“Illegal Remuneration on Behalf of Legal Entity”** is illegal transfer, offer or promise of funds, securities or other property to an official on behalf of or in the interests of a legal entity (or in the interests of another legal entity related to the legal entity), including a business entity, rendering property services to such official or

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providing such official with property rights (in particular, if the remuneration is transferred, offered or promised to another individual or legal entity on behalf of such official) for taking (omission of) actions in the interests of such legal entity (or in the interests of another legal entity related to such legal entity) connected with the official position held by the official;

- 2.1.11. **“Company”** is Siberian Coal and Energy Company Joint Stock Company;
- 2.1.12. **“Responsible Unit”** is a structural unit of the Company where employees must comply with applicable requirements in the corresponding area when performing their duties;
- 2.1.13. **“Gift”** is any article of value in tangible or intangible form which does not have to be purchased for normal price, including funds, securities and other property, property benefits and services (works, services, payment for entertainments, leisure, travel expenses, loans, discounts, provision of property for use, including housing, charitable contributions, donations, etc.) received or transferred due to work in the Company;
- 2.1.14. **“Prevention of Corruption”** is the Company’s activities aimed at introducing and developing elements of corporate culture, organizational structure, rules and procedures regulated by internal regulatory documents that ensure prevention of corruption offenses;
- 2.1.15. **“Due Diligence” (in relation to an asset)** is collection and analysis of information of status of the Asset and circumstances of its operation aimed at discovering maximum reasonably possible number of material risks that may arise from transaction with, and from ownership and (or) management of the Asset;
- 2.1.16. **“Core Unit”** is a structural unit of the Company that organizes and ensures compliance of the Company with applicable requirements in the corresponding area;
- 2.1.17. **“Employee”** is an individual engaged in labor relations with the Company;
- 2.1.18. **Financing of Terrorism** – provision or collection of funds or provision of financial services, knowing that they are intended for financing of organization, preparation and commission of at least one of the crimes provided for by articles 205, 205.1, 205.2, 205.3, 205.4, 205.5, 206, 208, 211, 220, 221, 277, 278, 279, 360 and 361 of the Criminal Code of the Russian Federation, either to finance or otherwise maintain a person for such person to commit at least one of the above crimes, or to maintain an organized group, an illegal armed group or a criminal community (a criminal organization) created or being created to commit at least one of the above crimes.

## 3. General Provisions

- 3.1.** This Policy is drawn up on the basis of requirements of Russian laws, norms of international laws, the Charter and other regulatory documents of the Company, and generally recognized principles of business conduct and best anti-corruption practices.
- 3.2.** The Company and its employees aspire to create and maintain a corporate culture which has no place for violation of law. The corruption combating system includes activities of the

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Company, including activities of employees and management bodies of the Company (within their powers) to prevent, discover, counter and investigate corruptive violations, to analyze and reduce risks of corruptive violations, to eliminate their causes, and to minimize and (or) eliminate consequences of such violations.

**3.3.** The core anti-corruption unit of the Company is the General Affairs Directorate.

**3.4.** All structural units of the Company are responsible for compliance with the anti-corruption requirements.

## **4. Corruption Combating Goals of the Company**

**4.1.** The Policy reflects commitment of the Company, its management bodies, managers of all levels and employees to the highest ethical standards of business to continue improving the corporate culture, to follow best corporate governance practices, and to maintain business reputation of the Company and the Company's Subsidiaries at a decent level.

**4.2.** The most important goals of this Policy are:

4.2.1. minimization of risk of involvement of the Company and employees of the Company in corruptive activities regardless of their position;

4.2.2. inadmissibility of the Company's participation in any form of money laundering and financing of terrorism;

4.2.3. formation of employees' uniform understanding of the Company's policy for rejection of corruption in all its forms and manifestations;

4.2.4. creation and maintenance of corporate values based on intolerance to corruption;

4.2.5. generalization and clarification of anti-corruption law requirements applicable to the Company and employees of the Company;

4.2.6. establishing the Company's employees' obligation to know and to comply with principles and requirements of this Policy, norms of applicable anti-corruption laws, corruption prevention procedures.

## **5. Policy Implementation Principles**

**5.1.** The Company undertakes to exert its utmost efforts to implement this Policy and comply with the following basic corruption combating principles:

5.1.1. The principle of Policy's compliance with current laws and generally accepted norms.

Compliance of the anti-corruption measures with provisions of the Constitution of the Russian Federation, international treaties of the Russian Federation, laws of the Russian Federation and other legal regulations applicable to activities of the Company.

5.1.2. The principle of management's personal example – “the tone from the top.”

The key role of managers at all levels in formation of culture of intolerance to corruption and in creation of intra-organizational system to prevent and combat corruption.

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### 5.1.3. The employee involvement principle.

Employees' awareness of anti-corruption law requirements and their active participation in formation and implementation of anti-corruption standards and procedures.

### 5.1.4. The principle of resource allocation according to the corruption risk level.

Development and implementation of measures aimed at reducing the likelihood of involvement of the Company, its managers and employees in corruptive activities are carried out on the basis of assessment of the corresponding corruption risks.

### 5.1.5. The anti-corruption procedures efficiency principle.

Implementation of anti-corruption measures in the Company that have justified cost, ensure ease of implementation and bring tangible results.

### 5.1.6. The principle of inevitability of punishment and responsibility.

Inevitability of punishment of an employee regardless of the position, the length of service or other similar conditions if the employee commits a corruption offense related to the employee's job duties, and everyone's responsibility for implementation of the anti-corruption policy in their functional areas.

### 5.1.7. The principle of openness in following the anti-corruption policy.

Notification of counterparties, partners and public of the anti-corruption business standards adopted by the Company.

### 5.1.8. The principle of regular monitoring and continuous monitoring.

Regular monitoring of efficiency of implemented anti-corruption standards and procedures, and control over their implementation.

## 6. Corruption Combating Measures

### 6.1. To combat corruption everywhere, the Company:

6.1.1. monitors Russian laws, international treaties, foreign laws, best anti-corruption practices;

6.1.2. implements measures to prevent and resolve conflicts of interest;

6.1.3. assesses corruption risks, discovers and regulates (adjusts) its business processes which have increased corruption risks;

6.1.4. established procedure of financial transactions which has multi-stage payment control mechanism;

6.1.5. carries out a set of anti-corruption measures in the process of procurement activities;

6.1.6. carries out obligatory verification of counterparties for their compliance with the anti-corruption requirements adopted by the Company;

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- 6.1.7. discloses information on the Company's Policy;
- 6.1.8. develops the system of informing, training, testing, questioning employees on anti-corruption issues;
- 6.1.9. established measures of punishment and motivation of employees in accordance with their actions or omissions in combating corruption;
- 6.1.10. carries out assessment of efficiency and adjustment of measures taken to combat corruption everywhere.

## **7. Political Activities and Political Donations**

- 7.1. The Company does not participate in political activities with direct or indirect purpose of influencing public officials' or other political entities' adoption of illicit decisions aimed at unlawful benefit for the Company, and is wary of cases when legal participation in political activities may be perceived as an attempt to render such unlawful influence.
- 7.2. In accordance with law, during preparation to elections and during elections, the Company does not sponsor any election associations or candidates and does not contribute to their achievement of their political goals.
- 7.3. The Company does not finance political parties, organizations and movements to illegally obtain business advantages in specific projects of the Company.
- 7.4. Employees of the Company do not make donations on behalf of and at the expense of the Company in favor of political parties or candidates for political positions.
- 7.5. The Company:
  - 7.5.1. reserves the right to cooperate with state and other bodies vested with powers, in development of projects and discussion of regulation of relations concerning legitimate interests of the Company in the forms permitted by applicable laws;
  - 7.5.2. recognizes the right of its employees to participate, as individuals, in political activities if such participation does not contradict applicable laws and requirements of this Policy. Personal participation of the employees in political activities should not actually or potentially conflict with interests of the Company or make such conflict inevitable;
  - 7.5.3. The Company does not compensate for political donations made by its employees and (or) counterparties as individuals.

## **8. Market Competition and Ethical Business Conduct**

- 8.1. The Company stands for free market relations and believes that efficient, law-abiding and ethical business benefits from competition. To achieve its statutory goals, the Company actively competes using legal and ethical methods. In particular, the Company:
  - 8.1.1. under no circumstances does not enter into arrangements or agreements that may exclude or limit competition, nor does it impede business activities of direct competitors in any other unlawful way;



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8.1.2. makes every reasonable effort to ensure its business relations with contractors and competitors are not only unconditionally legal, but also ethical. In its business activities, in particular, in its marketing and sales operations, procurement and supply activities, the Company refrains from any illegal forms of competition restriction provided for by applicable laws.

### 8.2. The workers:

8.2.1. do not use unfair methods of manipulation, intentional misrepresentation of information, or other illegal actions when carrying out business activities on behalf of the Company;

8.2.2. may not bind the Company with contractual obligations if it exceeds the powers delegated to them in accordance with requirements of the Company Standard SP 1.14-S-18 “Financial powers. Formation, agreement, approval, application and control procedure.”

## 9. Prevention of Corruption Manifestations

### 9.1. The Company:

9.1.1. does not participate in any activity aimed at legalizing (laundering) illegal proceeds and financing terrorism, that is the activity where the origin of illegally obtained funds – proceeds from crime or corruption – is transformed in a manner that creates impression that they are received from a legal source (from a legal activity);

9.1.2. refrains from any transactions in presence of sufficient grounds to believe that funds and other assets that are the subject of the transaction have illegal origin, in particular, are received from terrorist, corruptive or other criminal activities;

9.1.3. documents all its business relations, reflecting the true nature of transactions;

9.1.4. makes all reasonable efforts to do business only with the counterparties whose reputation is known to the industry and the Company itself as persons not participating in illegal business operations;

9.1.5. uses all available means to establish non-involvement of the Company’s counterparties in terrorist activities;

9.1.6. cooperates with the state, in particular, with law enforcement bodies to combat laundering proceeds from crime and financing terrorism;

9.1.7. makes all reasonable efforts to analyze business activities of potential counterparties in order to obtain sufficient guarantees that they will not violate applicable laws and standards of business ethics in their relations with the Company;

9.1.8. constantly monitors performance of transactions throughout the entire period of relations with counterparties to confirm that the operations carried out do not contradict applicable laws on combating corruption and legalization of funds obtained from crime;

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- 9.1.9. aspire to ensure that special conditions which oblige counterparties to comply with anti-corruption laws are included in contracts and agreements in the corresponding wordings used by the Company;
- 9.1.10. does not carry out actions aimed at obtaining illegal business advantages by exerting unlawful influence on a foreign public person;
- 9.1.11. to ensure guarantees of non-involvement in corruptive relations:
- outlaws offering, transferring or receiving bribes in any form, in particular, so-called “kickback,” that is, deductions from any part of payment under agreement in favor of the employee, his family members, friends, partners or acquaintances, and using other ways or channels to provide illegal benefits to counterparties or representatives of parties involved in the transaction, officials;
  - prohibits offering or receiving gifts, hospitality and any expenses if provided or incurred in bad faith and may result in violation of law;
  - informs counterparties of the Company’s corruption combating policy, monitors their activities and takes measures up to complete termination of relations if violations of anti-corruption laws are discovered;
  - ensures regular audit of operating systems in order to ensure their efficiency in terms of combating corruption;
  - regularly briefs key employees on combating corruption and laundering funds obtained from crime;
- 9.1.12. provides reliable and accessible communication channels through which employees and third parties can express their concerns, report violations of the Policy, offer improvements, and seek recommendations for the Policy application and any other assistance in combating corruption (section 15 of the Policy) freely, confidentially and without fear.

## **10. Due Diligence**

- 10.1.** To discover potential risks when performing certain transactions, the Company has mandatory Due Diligence procedure.
- 10.2.** Bases for the Due Diligence may include:
- sale or purchase of a company, a property complex;
  - assessment of investment attractiveness of a company;
  - public offer of securities on stock market;
  - merger and acquisition, other forms of business reorganization;
  - creation of joint venture, etc.
- 10.3.** Requirements to the procedure of audit in relation to such assets are established by local regulations approved by the Company.

## **11. Conflict of Interest**

- 11.1.** The Company’s activities in managing conflict of interest is based on the following principles:

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- 11.1.1. employee's obligation to disclose information on actual or potential conflict of interest;
- 11.1.2. ensuring rights and legitimate interests of the Company;
- 11.1.3. priority of preventive measures;
- 11.1.4. individual consideration and assessment of specific risks when discovering and resolving conflicts of interest;
- 11.1.5. confidentiality (to third parties) of the process of disclosing information on the conflict of interest and circumstances of its resolution;
- 11.1.6. ensuring protection of the employee who reported a conflict of interest;
- 11.1.7. protection of property interests and business reputation of the Company;
- 11.1.8. ensuring efficiency, creation of atmosphere of trust and openness in relations with third parties.

**11.2.** To prevent and/or resolve a conflict of interest, employees are obliged to:

- 11.2.1. take measures to prevent conflict of interest;
- 11.2.2. try not to allow situations where conflict of interest is inevitable;
- 11.2.3. immediately, before taking any actions, inform the Company of personal interest, of actual or potential conflict of interests, to participate in its resolution acting in good faith.

## 12. Business Gifts and Representation Expenses

**12.1.** Exchange of business gifts and hospitality, as well as representation expenses can be a necessary part of business only when aimed at establishing and (or) maintaining good-faith cooperation. Representation expenses, in particular, gifts and business hospitality, their amounts, frequency and purpose must comply with business ethics practice and the rules established in the Company.

**12.2.** Representation expenses are expenses for official reception and (or) service of partners' representatives participating in negotiations, and participants of official events of the Company, regardless of the location.

Representation expenses include:

- expenses for official reception (breakfast, lunch, dinner or other similar event) of the above persons and representatives of the Company participating in negotiations;
- expenses for ensuring transportation of the above persons to the event venue and back;
- buffet service during events and negotiations;
- other expenses incurred due to representation events included in other expenses connected with production and sale: lease of hall and equipment, design and

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technical support of the site (light, sound, etc.); video recording and photographing, event safeguarding, etc.

- 12.3. The purpose of giving business gifts and representation expenses cannot be a hidden or apparent remuneration for illegal service, action (omission), connivance, patronage, for unlawful provision of rights to make specific decision or attempt to influence recipient for another illegal purpose.
- 12.4. Maximum cost of a gift, procedure of notifying of a gift received due to performance of job duties are determined by local regulations of the Company.

## 13. Charity and Sponsorship

- 13.1. The Company may provide charity or sponsor support in accordance with requirements of applicable laws and principles of the Code of Corporate Conduct.
- 13.2. Donations can be provided to support healthcare (regardless of specific pharmaceutical products), science, culture, social activities, education, art, sports.
- 13.3. Charity or sponsor support cannot be used to transfer a hidden remuneration for illegal service, action (omission), connivance, patronage, for unlawful provision of rights to take certain decision.

## 14. Employment of Citizens Who Substituted Positions in State or Municipal Services

- 14.1. In accordance with laws of the Russian Federation, if the Company enters into agreement with a citizen who substituted a position in a state or a municipal service (according to the established list) within two years after his dismissal from the state or the municipal service, the Company notifies the last employer of such citizen. The notification is carried out in compliance with the requirements and within the terms established by applicable laws.
- 14.2. A citizen who has substituted a position in a state or a municipal service (in accordance with the list established by legal regulations) is obliged to inform the Company of the last place of the citizen's service when entering into labor or civil law agreements with the Company for performance of works (provision of services).

## 15. Corruption Combating Notification

- 15.1. If an employee has information on or suspects possible corrupt actions of other employees, counterparties or other persons interacting with the Company, and if an employee is contacted for the purpose of inducing to commit a corporate fraud or other corruption offenses, the employee must immediately report it to the Company in accordance with the rules established by this Policy and other local regulations.
- 15.2. The following special Company's secure and confidential communication channels are used for such reporting:

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- 8 800 200 12 40 telephone hotline for voice messages;
- secure email boxes Anti-fraud@suek.ru, Compliance@suek.ru for emails;
- the form on the Company's corporate portal on the Intranet for feedback;
- the Company's external website www.suek.ru for complains;
- addressing immediate superior;
- addressing the General Affairs Directorate;
- addressing the Compliance Unit;
- the special box for messages;
- any other way of communication at complain initiator's convenience.

- 15.3.** The Company guarantees that employees are informed on how and where to report on potential or committed corruption violations that have become known to them, or on cases when any persons contact them to induce to corporate fraud and other corruption offenses.
- 15.4.** The Company guarantees confidentiality to employees of the Company and other persons who have reported potential or committed corruption violations, and protection of such persons in the Company from any form of pressure, harassment and discrimination.
- 15.5.** The Company brings employees who did not disclose information on potential or committed corruption actions known to them, or on cases when they were contacted by any persons who tried to incline them to commit a corporate fraud and other corruption offenses, to liability established by law.
- 15.6.** The Company organizes recording, processing, consideration of the incoming messages, and, if necessary, measures to determine reliability of the information received, and to bring to liability the persons guilty in a corruption offense.
- 15.7.** The Company ensures confidentiality of the data received and their protection from leaks. The Company's employee who receives, registers and processes incoming messages is personally responsible for disclosure of the information received in accordance with law.
- 15.8.** Provision of knowingly false crime commission information entails criminal liability.

### 16. Liability

- 16.1.** Compliance with this Policy is unconditional obligation of each employee of the Company regardless of his or her position, length of service, working conditions and other similar circumstances.
- 16.2.** The Company will not put up with actions of employees violating this Policy.
- 16.3.** Managers of all levels are obliged to set an example of law-abiding and ethical conduct, and actively support compliance with requirements of this Policy.
- 16.4.** Employees of structural divisions of the Company, regardless of their position, length of service, working conditions and other similar circumstances, are personally liable for compliance with the Policy. Non-compliance with principles and requirements of the Policy is considered as a disciplinary offense and may be a basis for bringing to the liability established by law.

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- 16.5.** If an employee has doubts about correctness of his/her actions, the employee consults with the employee's immediate superior and, if necessary, with the General Affairs Directorate and the Compliance Unit. If a manager's order conflicts with requirements of applicable laws and this Policy, the employee has the right not to perform it, having notified it to the General Affairs Directorate and the Compliance Unit beforehand.
- 16.6.** The Company guarantees that the employee will not be brought to financial and disciplinary liability for refusing to perform the manager's order if such order contradicts requirements of applicable laws and this Policy, provided that the Company is properly notified in accordance with clause 16.5. hereof.
- 16.7.** The Company guarantees that none of the employees will be brought to liability for voluntary refusal to commit a corruption offense even if it results in lost profit or other adverse consequences for the Company.
- 16.8.** The Company has the right to periodically check employees' knowledge of corruption combating issues.
- 16.9.** The Company is aware that the Company may be held liable in accordance with laws of the Russian Federation if organization, preparation and commission of corruption offenses is carried out on behalf or in the interests of the Company.
- 16.10.** Liability of the Company does not relieve the guilty employee of liability for the corruption offense, as well as bringing employee to criminal or other liability for a corruption offense does not relieve the legal entity from liability.

## 17. Policy Approval and Amendment Procedure

- 17.1.** In accordance with the Charter of the Company, the Corruption Combating Policy is approved by the Board of Directors of the Company. The Policy is amended and supplemented by decision of the Board of Directors.

## 18. Regulatory Documents and References

- 18.1.** References to the following internal regulatory documents of the Company are used in this Policy:
- 18.1.1. Code of Corporate Conduct of the Company;
  - 18.1.2. SO-P-09 Compliance Policy of the Company;
  - 18.1.3. OD-FPR-2 "Policy for prevention, discovery and resolution of conflicts of interest";
  - 18.1.4. CS SP.1.16-S-24 "Regulations for compliance by the company's employees of international sanctions in relation to states, organizations and individuals when making transactions";
  - 18.1.5. YuO-R-36-2-SUEK "Counterparties relations compliance regulations";

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18.1.6. YuO-S-42-7-SUEK “Contractual documents. Drawing up, approval, signing, registration, storage and performance control procedure”;

18.1.7. SP.1.14-S-18 “Financial Powers. Formation, agreement, approval, application and control procedure”;

18.1.8. Financial powers delegation matrix for SUEK agreements signing;

18.1.9. Glossary in EDMS Docsvision.

Other local regulations/DocsVision catalogs.

**18.2.** References to the following external regulatory documents are used in this Policy:

18.2.1. United Nations Convention against Corruption (UNCAC) dated October 31, 2003 (Federal Law dated 08.03.2006 No. 40-FZ);

18.2.2. Criminal Law Convention on Corruption ETS No. 173 dated January 27, 1999 (Federal Law dated 25.07.2006 No. 125-FZ);

18.2.3. Convention on Combating Bribery of Foreign Public Officials in International Business Transactions dated November 21, 1997 (Federal Law dated 01.02.2012 No. 3-FZ);

18.2.4. US Foreign Corrupt Practices Act 1977;

18.2.5. UK Bribery Act 2010;

18.2.6. Transparency International the 2010 UK Bribery Act Adequate Procedures Guidance on good practice procedures for corporate anti-bribery programmes;

18.2.7. UK Ministry of Justice recommendations on building and implementing the system of the 2010 UK Bribery Act adequate compliance procedures, published on March 30, 2011;

18.2.8. Transparency International Anti-corruption Plain Language Guide 2010;

18.2.9. ICC Rules on Combating Corruption;

18.2.10. ISO 37001:2016 “Anti-bribery management systems – Requirements with guidance for use”;

18.2.11. ISO 31000:2009/GOST R ISO 31000-2010 “Risk management. Principles and guidance”;

18.2.12. COSO Enterprise Risk Management – Aligning Risk with Strategy and Performance (COSO ERM) 2017;

18.2.13. Civil Code of the Russian Federation;

18.2.14. Tax Code of the Russian Federation;

18.2.15. Criminal Code of the Russian Federation;

18.2.16. Code of Administrative Offenses of the Russian Federation;

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- 18.2.17. Federal Law dated 25.12.2008 No. 273-FZ on Combating Corruption;
- 18.2.18. Federal Law 30.12.2006 No. 281-FZ on Special Economic Measures;
- 18.2.19. Federal Law dated 07.08.2001 No. 115-FZ on Countering the Legalization (Laundering) of Proceeds from Crime and the Financing of Terrorism;
- 18.2.20. Decree of the President of the Russian Federation dated April 2, 2013 No. 309 “On measures to implement certain provisions of the Federal Law on Combating Corruption”;
- 18.2.21. Decree of the President of the Russian Federation dated July 15, 2015 No. 364 “On measures to improve organization of corruption combating activities”;
- 18.2.22. Decree of the President of the Russian Federation dated June 29, 2018 No. 378 “On national corruption combating plan for 2018 – 2020”;
- 18.2.23. “Corruption prevention and combating measures development and approval guidelines for organizations,” approved by the Ministry of Labor and Social Protection of the Russian Federation on 08.11.2013.
- Other external regulatory documents.