

## **ANTI-BRIBERY REGULATIONS**

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## **1. General principles**

Limited Liability Company RUSENERGOSBYT (hereinafter “the Company”) adheres to the principle of zero tolerance to corruption in all its forms and manifestations when carrying out any kind of activity.

The Company requires of its employees to be impartial, fair, open, conscientious and attentive when performing their duties. Compliance with the same requirements is expected from all other stakeholders (management bodies, counterparties and other entities involved in the Company's activities) (hereinafter the “stakeholders”).

The Company implements measures to prevent corruption in accordance with these Anti-bribery Regulations (hereinafter “the Regulations”).

## **2. Commitments**

Based on corruption risk assessment, all available information related to corruption risks is analyzed, both internally and externally. The Company assumes the following commitments in carrying out its business activities.

### **2.1 Corruption violations**

The Company forbids its employees to commit corruption violations for their personal advantage or for the Company’s benefit.

Any intentions of promises, offers and requests for such actions (inactions) must be communicated by the employees to their immediate supervisors and the Internal Audit Department through the dedicated channel set up to collect such reports, as defined in the Regulations. The Internal Audit Department immediately reports them to the Economic Security Department.

### **2.2 Contributions and donations to political parties**

The Company refrains from all forms of pressure, whether direct or indirect, on politicians, it does not finance political parties, their representatives or their candidates, and does not sponsor any event which exclusive purpose is political agitation.

### **2.3 Contributions and donations to charitable organizations and sponsorship**

The Company carries out charitable and sponsor activity in accordance with the legislation of the Russian Federation in force.

The Company carries out charitable and sponsor activities (support) in various forms, paying special attention to health care, promotion of healthy lifestyle, development of physical training and sports, education, science, culture, art, and the improvement of moral and psychological state of citizens.

In all cases, when selecting the proposals to support, the Company pays special attention to any possible conflict of interest of a personal or corporative nature.

Any expenses related to charitable activities (support) must be incurred in accordance with the Charter of the Company.

## **2.4 Facilitations**

The Company forbids any kind of payment or benefit to be made, offered or accepted in order to expedite services, which are in any case to be performed by the entities which the Company enters into relations with.

If facilitations shall be promised, offered or requested, the Company employees must inform their immediate supervisor and the Internal Audit Department through the dedicated channel set up to collect such reports.

## **2.5 Gifts**

Any form of gift which exceeds normal commercial practices or courtesy, or which is in any way meant to obtain favorable treatment in the pursuit of any activity tied to the Company, is prohibited. All forms of gifts to public officials in the Russian Federation or abroad, auditors, directors of the Company and its branches, Company management and committee members or their family members capable of influencing their independence of judgement or obtaining any type of advantage are prohibited.

This rule, which admits no exceptions, not even in countries where offering of valuable gifts to business partners is the custom, regards both gifts promised or offered. The term “gift” implies any kind of benefit (free participation in conferences, promise of employment, etc.). In all cases, the Company refrains from practices not allowed by law, commercial practice or the ethical codes of companies or entities with which it maintains business relations (on condition that these companies made the Company familiarized with their Codes of Ethics). Corporate souvenirs of the Company are intended to promote its image.

All gifts must be documented.

## **3. Implementation**

Respect for the Company’s commitments to the fight against corruption requires the involvement of its stakeholders in implementation of the Regulations.

### **3.1. Relations with third parties**

#### **3.1.1. Subsidiaries**

The subsidiary and associated companies are required to adopt similar Regulations.

#### **3.1.2. Agents, consultants and intermediaries**

The Company does not make illegal payments through agents, consultants and intermediaries.

Any person acting on behalf of the Company shall have prior acquaintance with the Regulations.

### **3.1.3. Contractors**

The Company proposes that those contractors which have no anti-corruption programs elaborate their own similar document and (or) be guided by principles of Company's Regulations in their commercial activity and business relations.

When concluding a contract (amending previously concluded contract), the Company proposes to include in the text of the contracts (additional agreements to contracts) provisions, containing recommendations for the contractors to be guided by principles of Company's Regulations in their commercial activity and business relations.

The documentation is executed and kept so that to guarantee maximum correctness, transparency and traceability of implementation of contracts concluded by the Company.

### **3.1.4. Procurement procedures**

The Company performs procurement procedures in a correct and transparent way.

Internal procurement processes are designed to obtain the maximum competitive advantage for the Company while granting equal opportunity to all suppliers. They are also based on conduct characterized by the essential and reciprocal elements of good faith, transparency and collaboration.

In cases where it is established that the counterparty violates the Regulations, the Company takes appropriate action within the limits of the law.

## **3.2. Human resources**

In the hiring process, the selected candidates are required to become familiar with the Regulations.

No employee must be penalized for refusing to commit corruption violations personally or through intermediaries.

In cases of breach of the Regulations, the Company applies sanctions to its employees provided for in the legislation of the Russian Federation in force.

## **3.3. Reporting**

Employees are required to report all violations or suspected violations of the Regulations to the Internal Audit Department, which is responsible for analyzing the report and, wherever possible, discussing it with the author and the one responsible for the alleged violation.

Such reports shall be sent in a written form to:

anticor@ruses.ru

All other stakeholders may send their reports of violation or suspected violation to the same address or in accordance with agreements, providing for the reporting of corruption offenses, signed between the Company and its counterparties.

In all cases, the confidentiality of the reporting person is guaranteed, with the exception of obligations to the law, and the protection of the rights of the company or the persons involved in the report.

The Internal Audit Department of the Company immediately reports violations to the Economic Security Department and in most serious cases after the relevant analysis reports the violations and recommended measures to the General Director.

### **3.4. Communication**

All employees are to become familiar with the Regulations.

The Regulations are available to all stakeholders on the Company's website [www.ruses.ru](http://www.ruses.ru).

The Internal Audit Department explains the norms of the Regulations and consults the employees on the arising questions.

### **3.5. Control activity**

#### **3.5.1. Internal control system**

Heads of Company structural divisions maintain control over compliance with the Regulations by employees of corresponding structural divisions.

#### **3.5.2. Audit**

Internal Audit Department elaborates recommendations aimed at improving internal control system and informs the General Director on it.

### **3.6. Control and review**

Assessment of the control system over compliance with the Regulations is carried out by the Internal Audit Department in accordance with the annual plan of internal audit of the Company.

The Internal Audit Department provides the General Director with the following information:

recommendations on the revision of the relevant internal policies and procedures to guarantee their consistency with these Regulations;

results of assessment of any modifications or additions to the Regulations proposed by the Internal Audit Department following the results of internal audit.