

Director
COMPASS ENGINEERING
SPÓŁKA Z OGRANICZONĄ
ODPOWIEDZIALNOŚCIĄ
Denys Sliusarchyk
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Coordinated
with the staff

ANTI-CORRUPTION PROGRAM

COMPASS ENGINEERING SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ

CONTENT

Preamble (values)	3
I. General provisions	3
1. Definition of terms	3
2. Purpose and scope	4
3. Responsible leadership, business reputation and integrity	4
4. Norms of professional ethics	5
II. Rights, obligations, prohibitions	5
1. Rights and obligations of founders (participants), the Head, members of management bodies, officials of all levels, employees (except the Commissioner) and representatives of the Company	5
2. Prohibited corrupt practices	6
III. Legal status of the Commissioner and his subordinates	6
1. General Provisions	6
2. Duties and rights of the Commissioner	7
3. Guarantees of independence	8
IV. Corruption risk management	8
V. Educational activities	9
1. Periodic training on prevention and detection of corruption	9
2. Providing employees with explanations and consultations from the Commissioner	9
VI. Prevention and inspection measures	9
1. Prevention and settlement of conflicts of interest	9
2. Interaction with business partners	10
3. Policies and procedures for business hospitality. Presents	11
4. Charity and sponsorship	11
5. Support for political parties	11
6. Verification during the conclusion of transactions on mergers or acquisitions	12
7. Verification of candidates for positions	12
VII. Notifications, their verification and responsibility	12
1. Reports of possible facts of corruption or corruption-related offenses, other violations provided for by the current anti-corruption legislation	12
2. Rights and guarantees for the protection of the whistleblower	13
3. Reports of possible facts of violations of this Program	13
4. Conducting internal investigations	14
5. Disciplinary liability for violation of this Program	14
VIII. Supervision, control, amendments to this Program	14
1. Supervision and control	14
2. Amendments to this Program	15

Preamble (values)

By this Anti-Corruption Program (hereinafter referred to as the Program), COMPASS ENGINEERING SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, a legal entity established and operating under the laws of Poland (hereinafter referred to as the Company), being aware of the responsibility for upholding the values of the rule of law and virtue, striving to ensure its sustainable development, taking care of its own business reputation, encouraging the use of good commercial practices, as well as in the interests, including but not limited to its founders, employees, business partners, customers, declares that its founders (participants), management bodies, officials and employees in their activities, as well as in legal relations with business partners, state authorities, local governments, others legal entities and individuals are guided by the principle of zero tolerance for corruption in any of its forms and manifestations and take (will take) all measures to prevent, detect and combat corruption provided for by law and this Program.

The company declares its principled position and condemns corruption as an illegal and unethical way of doing business.

I. General provisions

1. Definition of terms

1. In this Program, these terms are used in the following meanings:

Charity	voluntary personal and/or property assistance aimed at promoting the legitimate interests of recipients of charitable assistance in the areas of charitable activity determined by law, which does not provide for the Company to receive profit, as well as to pay any remuneration or compensation to the Company in the name of or on behalf of the recipient of charitable assistance
Contribution to the support of a political party	cash or other property, benefits, privileges, services, loans (credits), intangible assets, any other benefits of an intangible or non-monetary nature, sponsorship by the Company of measures or other activities in support of the party, goods, works, services provided by the Company free of charge or on preferential terms conditions (at a price below the market value of identical or similar works, goods and services in the relevant market) received by a political party, its local organization, which, in accordance with the established procedure, acquired the status of a legal entity
Business hospitality	entertainment events (for example, business breakfasts, lunches, dinners, cocktail parties, tastings, other events (conferences, cultural and sports events)), reimbursement of travel expenses, accommodation, other types of expenses incurred by the Company or in relation to the Company in order to establish or adjust business relations or for other purposes related to the activities of the Company
Business relationship	relations between the Company and a business partner related to the business, professional or economic activities of the Company, arising on the basis of a transaction or other activities of the Company and providing for the duration of existence after their establishment
Business partners	legal entities and/or individuals with whom the Company maintains, enters into or intends to enter into business relations
Incentive payments	unofficial and illegal payments to officials for the purpose of facilitating / accelerating / facilitating or, in certain cases, the proper implementation of legal procedures that the Company is entitled to receive without making such payments
Corruption risk	the likelihood of committing a corruption or corruption-related offence or other violation of the current anti-corruption legislation, which will adversely affect the Company's operations
Improper benefit	money or other property, benefits, privileges, services, intangible assets, any other benefits of an intangible or non-monetary nature that are offered, promised, provided or received without legal grounds
Zero tolerance for corruption	absolute intolerance to corruption in any of its manifestations

Company representative	a person duly authorized to act on behalf or in the interests of the Company in relations with third parties
Official person	a person authorised to perform the functions of the state or local self-government in accordance with the applicable law;
Sponsorship activities (sponsorship)	voluntary material, financial, organizational and other support by the Company of any event or activity in order to popularize the name of the Company, marks for goods and services of the Company

2. Purpose and scope

1. The purpose of this Program is to ensure the functioning of an effective system for preventing and combating corruption, the compliance of the Company's activities with the requirements of anti-corruption legislation, taking into account the best world practices.

2. This Program establishes a set of measures (rules, standards and procedures) to prevent, detect and combat corruption in the Company's activities.

3. Measures to prevent, identify and eliminate or minimize corruption risks are recognized as a priority in the Company's activities.

4. This Program is mandatory for the founders (participants), the Head, management bodies, officials of all levels, employees, representatives of the Company and persons who are trained in the Company or perform certain work on the basis of civil law contracts concluded with the Company.

5. This Program is mandatory for all business entities (subsidiaries, separate divisions, branches, representative offices) over which the Company exercises control.

6. This Program is applied in all areas of the Company's activities, including in relations with business partners, officials, state authorities and local governments, other legal entities and individuals.

7. Provisions on the obligatory observance and implementation of this Program are included in the internal labor regulations of the Company, regulations on structural divisions, all labor agreements, including contracts, and job descriptions.

8. This Program was approved by the order of the Head of the Company after its discussion with officials of all levels and employees of the Company.

9. The scanned text of this Program is permanently available on the Company's website for employees, officials of all levels, management bodies, representatives of the Company, as well as for business partners.

3. Responsible leadership, business reputation and integrity

1. The Head, management bodies, officials of all levels of the Company undertake the obligation, by personal example of moral behavior, to form among the Company's employees zero tolerance for corruption, which is the basis of business culture, daily business practice and business reputation of the Company.

2. The Head, the management bodies of the Company undertake to demonstrate leadership and responsibility for:

1) compliance with the requirements of anti-corruption legislation;

2) ensuring proper implementation, effective functioning, periodic analysis, timely review and improvement of the system for preventing and combating corruption in the Company in order to properly respond to corruption risks in the Company's activities;

3) dissemination of a culture of zero tolerance for corruption in all areas of the Company's activities;

4) appointment of a person responsible for the implementation of this Program (hereinafter referred to as the Commissioner), providing it with appropriate material and organizational working conditions, facilitating the implementation by the Commissioner of the tasks and functions provided for by the current legislation and this Programme, ensuring the independence of the Commissioner's activities;

5) encouraging officials at all levels to demonstrate leadership in preventing and combating corruption within their powers;

6) directing employees to support the Company's anti-corruption policy and making a personal contribution to the effectiveness of the system for preventing and combating corruption;

7) informing about the policy of preventing and combating corruption both within the Company and in relations with business partners, officials, state authorities, local governments, other legal entities and individuals;

8) observance of the rights and guarantees of whistleblower protection provided for by the current legislation;

9) timely and proper response in accordance with the law to the facts of commission (possible commission) of corruption or corruption-related offenses by members of the Company's management bodies, officials at all levels, employees.

4. Norms of professional ethics

1. Founders (participants), the Head of the Company, members of management bodies, officials of all levels, the Commissioner, employees and representatives of the Company in the performance of their official (contractual) duties:

- 1) strictly comply with generally recognized ethical standards of conduct;
- 2) tolerantly and respectfully treat political views, ideological and religious beliefs of other persons;
- 3) act, despite personal interests, personal attitude towards any persons, on their political, ideological, religious or other personal views or beliefs;
- 4) do not disclose or use confidential information that became known to them in connection with the performance of their official (contractual) duties, except in cases established by law;
- 5) competently, timely, efficiently and responsibly perform official (contractual) duties, decisions and instructions of the bodies and officials to whom they are subordinate, accountable or controlled, and do not allow abuse and inefficient use of the Company's funds and property.

2. The founders (participants), the Head, management bodies, officials of all levels, the Commissioner, employees, representatives of the Company refrain from obviously criminal actions, decisions and instructions and take measures to cancel such decisions and instructions.

3. Officials of all levels, the Commissioner, employees, representatives of the Company are obliged to refrain from executing decisions or orders of management that are obviously criminal.

4. In the event of receipt for execution of decisions or orders that are obviously criminal, the official, the Commissioner, the employee, the representative of the Company must immediately inform in writing the immediate supervisor or the Head of the Company, or its founders (participants) and the Commissioner.

5. An official, the Commissioner, an employee cannot be dismissed or forced to dismiss, brought to disciplinary responsibility or subjected to other negative measures of influence by the management or the threat of such measures of influence in connection with the refusal to execute decisions or instructions that are clearly criminal.

6. Officials, employees of the company, the Commissioner cannot be held disciplinary liable for refusing to participate in corrupt practices, even if such refusal may lead to the loss of the Company's competitive advantage or potential benefit.

II. Rights, obligations, prohibitions

1. Rights and obligations of founders (participants), the Head, members of management bodies, officials of all levels, employees (except for the Commissioner) and representatives of the Company

1. Founders (participants), the Head of the Company, members of management bodies, officials of all levels, employees and representatives of the Company have the right to:

- 1) provide proposals for the improvement of this Program;
- 2) apply to the Commissioner for consultations and clarifications regarding the implementation of this Program, other internal documents of the Company on the prevention of corruption, anti-corruption legislation;
- 3) receive recommendations from the Commissioner on further actions in case the planned actions or decisions may be a source of corruption risks.

2. Founders (participants), the Head of the Company, members of management bodies, officials of all levels, employees and representatives of the Company are obliged to:

- 1) comply with the requirements of the current anti-corruption legislation, this Program and internal documents adopted for its implementation, as well as ensure the implementation of this Program;
- 2) fulfill their official (contractual) duties based on the legitimate interests of the Company;
- 3) immediately inform, in the manner prescribed by this Program, the Commissioner, the Head (Head of the executive body) of the Company or the founders (participants) of the Company about cases of violation of the requirements of this Program (or cases of incitement to such actions), commission of corruption or corruption-related offenses by the founders (participants), manager, members of management bodies, officials at all levels, employees of the Company or existing or potential business partners;

- 4) promptly inform in the manner determined by this Program about the occurrence of a real, potential conflict of interest; take measures to prevent and resolve real or potential conflicts of interest; not to take actions and make decisions in conditions of a real conflict of interest;
- 5) refrain from behavior that can be regarded as a readiness to commit a corrupt or corruption-related offense related to the activities of the Company;
- 6) inform the Commissioner about the implementation and acceptance of business hospitality, giving and receiving gifts in the manner determined by the Company;
- 7) take into account the recommendations of the Commissioner.

2. Prohibited corrupt practices

1. The Head, members of management bodies, officials of all levels, the Commissioner, employees and representatives of the Company are prohibited from:

- 1) accepting an offer, promise or receiving illegal benefits, as well as asking to provide such benefits for themselves or other individuals or legal entities for committing or not committing any or acting using the position they hold in the Company, or in connection with their activities for the benefit of the Company, for the benefit of offering, promising or providing such benefit, or for the benefit of a third party;
- 2) abusing their powers, i.e. intentionally, in order to obtain an unlawful benefit for himself or another individual or legal entity, use his powers contrary to the interests of the Company;
- 3) offering, promising or providing (directly or through a third party) to officials and / or their relatives, other individuals unlawful benefits for committing or not committing any – any actions / inactions using the power granted to them, official position, authority to obtain or maintain any advantages for the Company;
- 4) taking actions and making decisions in conditions of a real conflict of interest;
- 5) using any property of the Company or its funds for personal interests;
- 6) organizing, acting as an intermediary or personally making any cash or non-cash payments or settlements with business partners of the Company, other individuals or legal entities, if such payments or settlements are not provided for by law or transactions concluded by the Company;
- 7) influencing directly or indirectly the decision of the Company's employees in order to obtain unlawful benefits for themselves or other persons;
- 8) taking any actions that directly or indirectly incite other employees, officials at all levels to violate the requirements of the current anti-corruption legislation or this Programme;
- 9) giving and receiving gifts in violation of the requirements of the law and this Program for the provision and acceptance of business hospitality and gifts;
- 10) after the release or other termination of cooperation with the Company, to disclose or otherwise use in their own interests information, including confidential information, which became known to them in connection with the performance of their powers, contractual obligations, except as otherwise provided by law.

2. The Company prohibits the payment of incentive payments to officials, in particular, for the purpose of speeding up any formal procedures related to obtaining permits, or making appropriate decisions in favor of the Company, or obtaining other benefits for the Company.

The payment for expedited consideration paid to the account of a government body or local government, enterprise, institution, organization, official, state / local budget, the amount and payment of which is provided for by law (for example, payment for expedited registration of patents) is not an incentive payment.

An official, employee or representative of the Company who is requested to make an incentive payment is obliged to notify the person making such a request of the prohibition of its implementation, to refuse to make such a payment, and to immediately inform his immediate supervisor and the Commissioner of the received request.

If an official, employee or representative of the Company has any doubts about whether the payment belongs to an incentive payment and the prohibition of its implementation, such an official, employee or representative of the Company should seek advice from the Commissioner.

3. Prohibitions apply without any territorial restrictions in the territory of any state, regardless of national traditions, local practices or competitive conditions in force in that state.

III. Legal status of the Commissioner and his subordinates

1. General Provisions

1. The legal charter of the Commissioner is determined by this Program.

The Commissioner is appointed by the Head of the Company to a separate position in accordance with labor legislation and documents of the Company.

The Commissioner subordinate, accountable and controlled by the Head of the Company.

2. The Commissioner may be dismissed from office ahead of schedule in cases provided for by current legislation.

2. Duties and rights of the Commissioner

1. Duties of the Commissioner:

- 1) perform his duties impartially;
- 2) organize the preparation, develop and submit for approval to the Head of the internal documents of the Company on the formation and implementation of this Program;
- 3) organize a periodic assessment of corruption risks in the Company's activities;
- 4) ensure interaction and coordination between the structural divisions of the Company for the preparation, implementation and control over the implementation of measures provided for by this Program;
- 5) provide the founders (participants), the Head, management bodies, officials of all levels, employees of the Company with clarifications and individual consultations related to the implementation of this Program and compliance with the requirements of anti-corruption legislation;
- 6) provide employees of the Company or persons who are trained in the Company or perform certain work on the basis of civil law contracts concluded with the Company, methodological assistance and advice on notification of possible facts of corruption or corruption-related offenses, and the protection of whistleblowers, conduct training on these issues;
- 7) ensure that the public is informed about the measures taken by the Company to prevent corruption;
- 8) organize events to improve the skills of the Company's employees to prevent and combat corruption;
- 9) regularly, at least once every 2 years, improve his qualification, initiate issues with the Head of the Company regarding his professional training (advanced training);
- 10) take measures to identify a conflict of interest and contribute to its settlement, inform the Head of the Company about the discovery of a conflict of interest and the measures taken to resolve it;
- 11) organize and conduct audits of the company's business partners, audits in merger and acquisition procedures;
- 12) participate in the Company's personnel selection procedures, in particular, by initiating, organizing, conducting checks of candidates for positions;
- 13) check the presence of corruption risks and coordinate payments and expenses related to charitable and sponsorship activities, making contributions in support of political parties;
- 14) check for the presence of corruption risks and coordinate (approve) draft organizational and administrative documents, transactions of the Company;
- 15) organize the work of internal channels for reporting possible facts of corruption or corruption-related offenses;
- 17) participate in internal investigations conducted in accordance with this Program;
- 18) inform the Head of the Company or founders (participants) about facts indicating the commission of corruption or corruption-related offenses by members of management bodies, officials at all levels, employees, and representatives of the Company;
- 19) in case of detection of a corruption or corruption-related offense or receipt of notification of such an offense by members of management bodies, officials of all levels, employees of the Company, take measures to suppress such an offense and immediately, within 24 hours, report in writing about it a specially authorized entity in the field of combating corruption;
- 20) cooperate with whistleblowers, ensure observance of their rights and guarantees of protection;
- 21) provide supervision, control and monitoring of compliance with this Program, anti-corruption legislation.

2. Rights of the Commissioner:

- 1) receive from the governing bodies and members of the governing bodies, officials of all levels, employees and representatives of the Company, oral and written explanations of circumstances that may indicate a violation of the requirements of the current legislation on combating crime and this Program for the prevention and settlement of conflicts of interest and other stipulated requirements, restrictions and prohibitions, as well as other issues related to the implementation of this Program;
- 2) summon and interrogate persons whose actions or omissions relate to the facts reported by the whistleblower, including officials of all levels of the Company;

3) have, subject to restrictions established by law, access to documents and information, the manager of which is the Company, necessary for the performance of the duties assigned to it, to make or receive copies of them;

4) process information, including personal data, in compliance with the legislation on access to personal data;

5) get access to the warehouse, production and other premises of the Company in case of need for anti-corruption measures;

6) submit for consideration by the Head of the Company proposals for improving the work of the Commissioner / division of the Commissioner;

7) apply to the founders (participants), the Head, the management bodies of the Company on the implementation of their powers and performance of official duties;

8) other rights provided for by the applicable anti-corruption legislation, this Program, the employment contract, the job description of the Commissioner, other internal documents of the Company.

3. Guarantees of independence

1. The performance by the Commissioner of his functions in the Company is independent. Interference in the activities of the Commissioner by the founders (participants), the Head of the Company, management bodies and members of management bodies, officials of all levels, employees, representatives, business partners of the Company, as well as other persons is not allowed.

IV. Corruption risk management

1. To effectively prevent corruption in its activities, the Company applies a risk-based approach and creates a risk management system that provides for the regular assessment of corruption risks that may affect the Company's activities, taking measures necessary and sufficient to eliminate or minimize them, their further monitoring and control, as well as updating existing anti-corruption measures in accordance with changes in the internal and external environment of the Company's activities.

2. The Company carries out a periodic assessment of corruption risks in its activities, the purpose of which is:

1) identification of internal and external corruption risks in the business processes of the Company;

2) assessment of the sufficiency, appropriateness and effectiveness of existing measures for the proper prevention, elimination or minimization of identified corruption risks;

3) analysis and assessment (determination of levels) of identified corruption risks;

4) prioritization of high-risk business processes, taking into account the nature and degree of vulnerability of business processes to corruption risks, the levels of assessed corruption risks;

5) development of measures to effectively eliminate or minimize corruption risks in the Company's activities.

3. The organization of the periodic assessment of corruption risks in the activities of the Company is carried out by the Commissioner.

4. The Company may carry out an internal and/or external assessment of corruption risks.

Internal assessment of corruption risks is carried out by a working group, which is formed from representatives of the Company's structural divisions.

External assessment of corruption risks is carried out by audit, legal, consulting companies or independent experts engaged by the Company.

5. The Company assesses corruption risks in its activities at least once every 2 years.

6. The Company may decide to conduct an assessment of corruption risks in accordance with the procedure established by law.

7. Based on the results of the assessment of corruption risks in the activities of the Company, a register of risks is formed.

8. The register of risks must contain:

1) identified corruption risks, areas (directions) of the Company's activities in which they are identified, their descriptions, sources, existing control measures, assessment of their sufficiency, compliance and effectiveness;

2) levels of identified corruption risks;

3) proposals for measures to eliminate or minimize identified corruption risks (including updated/new anti-corruption measures at the Company level and/or at the business process level), deadlines (terms) for their implementation, responsible departments/executors, necessary resources, performance indicators).

9. The register of risks after its registration based on the results of the assessment of corruption risks is submitted for approval to the Head of the Company.

10. The Head of the Company approves the risk register and ensures the measures taken by him, including by updating existing anti-corruption measures, and allocates the necessary resources for this.

11. At the request of a participant (founder) of the Company, the register of risks is brought to the attention.

12. The risk register is provided for execution by the responsible departments / executors, and can also be posted on the Company's website (if available) for review by all interested parties.

13. The Commissioner monitors the implementation of measures to eliminate or minimize the identified corruption risks, prepares and submits reports on the status of the implementation of measures in the manner and within the time frame specified by this Program.

V. Educational activities

1. Periodic training on prevention and detection of corruption

1. In order to form an appropriate level of anti-corruption culture, the Commissioner ensures the organization of mandatory familiarization with the provisions of the current anti-corruption legislation, this Program and the internal documents of the Company adopted for its implementation by newly appointed employees, representatives of the Company and persons who are trained in the Company or perform a certain work.

2. The Company provides adequate and sufficient proof of the provisions of this Program and internal documents of the Company in the field of preventing and combating corruption, changes in anti-corruption legislation and the practice of its application to all employees, representatives and business partners of the Company by informing (communications).

3. Responsible for informing on the issues of prevention and detection of corruption Commissioner.

4. The Company provides periodic advanced education (training) for the Head, members of management bodies, officials at all levels, employees, the Commissioner and, if necessary, representatives of the Company.

5. The Commissioner shall take into account measures to improve skills in the field of prevention and detection of corruption, take into account those present at such events and evaluate their effectiveness.

2. Providing employees with explanations and consultations from the Commissioner

1. If there are questions regarding the clarification of certain provisions of this Program, the founders (participants), the Head, members of management bodies, officials at all levels, employees and representatives of the Company may apply to the Commissioner for oral or written clarification or advice.

2. The Commissioner provides clarification or advice within a reasonable time, but not more than 10 days from the date of receipt of the application. If it is impossible to give an explanation or consultation within the specified period, the Commissioner may extend the term for consideration of the application, of which the person who applied for an explanation or consultation is necessarily notified. The total term for consideration of the application may not exceed 30 days from the date of receipt by the Commissioner.

3. The Commissioner summarizes the most frequently asked questions on which he is addressed, answers to them and places generalized explanations (consultations, etc.) of an informational nature on resources publicly available to employees of the Company and / or distributes them in another way (for example, by means of electronic mail).

4. The Commissioner may choose other forms of providing clarifications and consultations on the implementation of this Program and anti-corruption legislation (sights, guides, video messages, etc.).

VI. Prevention and inspection measures

1. Prevention and settlement of conflicts of interest

1. The Company strives to ensure that the conflict of interest does not adversely affect the interests of the Company, as well as the interests of its clients / customers, founders / participants by preventing, identifying and resolving conflicts of interest.

2. The Company shall prevent and resolve situations of conflict of interest based on the following principles:

1) the obligation to inform employees about situations that have signs of a conflict of interest;

2) prevention of a conflict of interest;

3) an individual approach to the consideration and evaluation of each particular case that has signs of a conflict of interest.

3. Not later than the next working day from the day when they found out or should have found out that they have a real or potential conflict of interest, employees of the Company are obliged to notify their immediate

supervisor and the Commissioner in writing, not to take actions and not to make decisions in conditions of a real conflict of interest and take steps to manage actual or potential conflicts of interest.

4. In the event of a real or potential conflict of interest with the Head of the Company, he notifies in writing the Commissioner and the person or body (including collegiate), whose powers include dismissal/initiation of dismissal from the position of the Head of the Company.

5. In the event of a real or potential conflict of interest with a representative of the Company, he shall notify the Commissioner of this in writing.

6. In the event of a real or potential conflict of interest with the Commissioner, he shall notify the Head of the Company in writing.

7. Within two working days after receiving a notification that the subordinate has a real or potential conflict of interest, the immediate supervisor of the person, taking into account the recommendations of the Commissioner, makes a decision on the method of resolving the conflict of interest, which is reported to the employee.

8. The immediate supervisor, who became aware of a conflict of interest with an employee subordinate to him (including in the case of independent identification of a conflict of interest that his subordinate has, without making a corresponding notification), is obliged to inform the Commissioner and take the measures provided for by this Program to prevent and resolving conflicts of interest.

9. Settlement of a conflict of interest is carried out using one of the following measures (separately or in combination):

1) removal of an employee from performing a task, taking actions, making a decision or participating in its adoption in conditions of a real or potential conflict of interest;

2) the use of external control over the performance by the person of the relevant task, the performance by him of certain actions or the adoption of decisions;

3) restriction of an employee's access to certain information;

4) revision of the size of the official (functional) duties of the employee;

5) transfer of an employee to another position;

6) dismissal of an employee.

2. Interaction with business partners

1. The Company strives to cooperate with business partners who carry out their activities legally and morally, interaction with which does not bear corruption risks for the Company.

2. The Company informs business partners before establishing business relations with them about the principles and requirements of the Company in the field of preventing and combating corruption, provided for by this Program, other policies developed for its implementation, including the procedure for checking business partners.

3. The Company checks potential business partners (before the date of conclusion of transactions) and existing business partners (after establishing legal relations with them).

4. Checking potential or existing business partners of the Company is carried out by the Commissioner. Other structural divisions of the Company may also be involved in the audit.

5. Criteria, grounds, procedure and frequency of verification of the Company's business partners are determined in the Company's internal documents developed by the Commissioner and approved by the Head (executive body) of the Company.

6. Audit procedures, frequency of audits and criteria for selecting business partners are determined depending on the scope and location of activities, the structure of the Company, the nature and level of corruption risks that may arise in relations with a business partner.

7. Verification of the Company's business partners is carried out in order to:

1) check the business partner's business reputation for tolerance to corruption, namely: whether the business partner has a reputation as an entity whose activities are related to corruption (even in the absence of relevant court decisions), and whether the business partner will act as an intermediary to transfer to third parties (or to receive from third parties) an undue benefit;

2) verify that the business partner has an anti-corruption program (or other anti-corruption policies), the state of its (their) actual implementation, readiness (or refusal) to comply with the principles and requirements of the Company, as well as anti-corruption legislation;

3) identify possible corruption risks in connection with the conclusion (execution) of the transaction;

4) minimize the likelihood of committing or verifying possible facts of committing a corruption or corruption-related offense, other violation of anti-corruption laws when establishing and implementing legal relations with a business partner.

8. If there are reasonable doubts about the business reputation of a business partner, which may lead to corruption risks for the Company, the Company reserves the right to refuse the business partner to establish / continue business relations.

9. Agreements (contracts) that the Company concludes with business partners may include anti-corruption clauses. The purpose of the anti-corruption clause is to provide assurances by the Company that it will comply with anti-corruption laws to which it is subject, and to obtain similar assurances from a business partner.

Versions of anti-corruption clauses are developed by the Commissioner, taking into account the areas of the Company's activities.

3. Policies and procedures for business hospitality. Presents

1. The Company, taking into account the requirements of the law, determines the general policy and procedures for the provision and acceptance of business hospitality and gifts.

2. The Head, members of management bodies, officials of all levels, employees, representatives of the Company are obliged to refrain from offering business hospitality, gifts to officials, their relatives, actual or potential business partners, their employees or representatives, if such business hospitality, gifts can be regarded as an inducement or readiness to commit a corruption offense related to the activities of the company.

3. Giving and receiving gifts, as well as providing and accepting business hospitality within the framework of establishing or maintaining business relations or to achieve other goals of the Company's activities is allowed if it meets the following criteria:

1) does not affect the objectivity of any decision to conclude transactions, provide or receive services, information, or any other benefits for the Company;

2) is not a hidden undue advantage (for example, in order to receive or continue to receive commercial orders or an improper advantage);

3) meets generally accepted ideas about hospitality (for example, souvenirs are gifts);

4) is not prohibited by the legislation of the state in which they are provided and/or accepted;

5) the cost does not exceed the limits established by law and the Company;

6) is not prohibited in accordance with the internal documents of the recipient's organization and does not exceed the cost established by such documents;

7) disclosure of a gift, business hospitality will not create a risk to the business reputation of the Company or the recipient of the gift, business hospitality;

8) gifts, business hospitality are justified, not excessive and appropriate in the context of establishing/maintaining business relations.

4. It is not allowed to give and receive gifts in the form of cash (cash or non-cash), cash equivalent (gift cards or gift vouchers).

5. In case of doubts about the acceptability of a gift, business hospitality, employees should contact the Commissioner in the manner prescribed by this Program for advice and / or clarification.

6. The Head, members of management bodies, officials of all levels, employees, representatives of the Company within one working day notify the Commissioner of the facts of providing (implementing) or receiving a gift / business hospitality within the framework of generally recognized ideas about hospitality in the manner established by the Company.

4. Charity and sponsorship

1. The Company may carry out charitable and sponsorship activities in the absence of prohibitions established by law and internal documents of the Company.

2. The Company carries out charitable and sponsorship activities in accordance with the law and in the absence of a reasonable opinion of the Commissioner on the presence of corruption risks.

5. Support for political parties

1. The Company does not support political parties unless expressly prohibited by law or Company policy.

6. Verification during the conclusion of transactions on mergers or acquisitions

1. When planning and concluding merger or acquisition transactions, the Company checks the legal entity – the potential object of the merger or acquisition – in order to identify corruption risks, verify the objectives and procedure for performing such a transaction for compliance with anti-corruption legislation and this Program.

2. Verification is carried out before the transaction and after it.

3. The scope of the audit is determined by the Company depending on the nature and level of corruption risks that may arise in connection with the transaction on a particular merger or acquisition object.

4. The Commissioner is involved in the inspection and other persons may be involved.

5. Prior to the transaction, verification includes:

1) study of the history and activities of the merger or acquisition object, the structure of its founders/participants/ultimate beneficial owners;

2) determination of possible connections of the object of merger or acquisition with officials and the nature of interaction with them;

3) study of the main elements of the system for preventing and combating corruption (anti-corruption program, corruption risk management system) of the merger or acquisition object;

4) identification of cases of corruption in which the object of the merger or acquisition may be involved (information about the investigation, ongoing / court proceedings);

5) checking the existence of ongoing sanctions applied to the object of the merger or acquisition;

6) establishment of the circle of counterparties of the merger or acquisition object (clients, suppliers, intermediaries) with high corruption risks and the nature of contractual relations with them;

7) study of the internal control mechanisms of the merger or acquisition object (control over transactions with high corruption risks, giving gifts, business hospitality, charitable and sponsorship activities);

8) study of the existence and functioning of the system for reporting corruption or corruption-related offences;

9) determination of the volume and nature of issues that should be given attention after the transaction.

7. Verification of candidates for positions

1. In order to implement this Program, the Company, as part of the personnel selection procedures, checks candidates for positions vulnerable to corruption risks.

2. Verification of candidates for positions is carried out in order to:

1) determine whether the conclusion of an employment contract with a candidate causes corruption risks for the Company;

2) determine whether the conclusion of an employment contract with a candidate will lead to a violation of anti-corruption legislation;

3) make sure that the candidate undertakes to comply with the requirements of this Program.

3. The decision to conclude an employment contract is made taking into account the requirements of anti-corruption legislation.

4. Verification of candidates for positions vulnerable to corruption risks is carried out by the Commissioner. Based on the results of the inspection, the Commissioner prepares a reasonable conclusion for the Head of the company about the presence or absence of corruption risks.

5. The procedure for the verification of candidates for positions and the list of positions vulnerable to corruption risks are determined by the Company.

6. The materials of verification of candidates for positions vulnerable to corruption risks are kept in personal files during the entire period of their storage.

VII. Notifications, their verification and responsibility

1. Reports of possible facts of corruption or corruption-related offenses, other violations provided for by the current anti-corruption legislation

1. The Company creates favorable conditions for whistleblowers and builds respect for whistleblowers as part of the Company's business culture.

2. The Company provides whistleblowers with the conditions for reporting possible facts of corruption or corruption-related offenses (hereinafter – the Notification) by:

1) the mandatory creation and operation of channels through which a person can make Notifications while maintaining their anonymity (hereinafter referred to as the Message Channels);

- 2) providing methodological assistance and advice on the implementation of Notification to potential whistleblowers;
- 3) introduction of mechanisms to encourage and form a culture of the Notification;
- 4) observance of the rights and guarantees for the protection of whistleblowers.
3. Whistleblowers determine which communication channels to use to carry out the Notification.
4. Whistleblowers are guaranteed confidentiality in accordance with the procedure and under the conditions established by the current legislation.
5. A person can make a Notification without attribution (anonymously).
6. Information about the Notification Channels is communicated to all employees, including at the time of hiring.
7. The Company encourages its business partners to report through the Notification Channels any facts of corruption or corruption-related offences committed by the Company's management, members of governing bodies, officials of all levels, employees and representatives.
8. The Notification must contain factual data confirming the possible commission of a corruption or corruption-related offence that can be verified.
9. An anonymous communication is subject to consideration if the information contained in it relates to a specific person containing factual data that can be verified.

2. Rights and guarantees for the protection of the whistleblower

1. The whistleblower is provided with guarantees of protection of his/her rights in accordance with the procedure and under the conditions established by the current legislation.
2. It is prohibited to disclose information about the identity of the whistleblower, his relatives or other data that can identify the identity of the whistleblower, his relatives, to third parties who are not involved in the consideration, verification and / or investigation of the facts reported by him, as well as to persons, actions or inaction which relate to the facts notified to him, except in cases established by law.
3. Access to information about whistleblowers is available only to the Head of the Company, the Commissioner and the employees designated by him, involved in the process of accepting and considering Notifications in the Company.
4. In case of leakage of confidential information about the whistleblower, the Commissioner, the Head (executive body) of the Company, at the request of such a person or on his own initiative, must immediately take all measures to avoid negative consequences for the whistleblower associated with such disclosure.
5. The Company prohibits the intimidation, humiliation or prosecution of whistleblowers, the use of other negative measures of influence against them (denial of employment; dismissal or forced dismissal; bringing to disciplinary responsibility; other measures, including formally lawful decisions and actions that are selective nature, in particular, do not apply to other employees in similar situations and / or have not been applied to an employee in similar situations before, or threats in applying such measures of influence.
6. The whistleblower may not be fired or forced to be fired, disciplined, subjected to other negative measures of influence or the threat of such measures in connection with the Notification.
7. The founders (participants), the Head, governing bodies, officials of all other levels, the Commissioner, within their powers, provide conditions for the protection of whistleblowers.
8. The rights and guarantees for the protection of whistleblowers extend to close persons of the whistleblower.

3. Reports of possible facts of violations of this Program

1. Employees and persons studying at the Company or performing certain work, representatives, as well as business partners of the Company may report any signs of violations of this Program, facts of incitement of employees, a manager, officials of all levels, members of the Company's management bodies before committing corrupt or related corruption violations, directly to the Head (Head of the executive body) of the Company, the Commissioner or founders (participants) of the Company or by sending an electronic message to the Company's email address. The Company may provide for other ways of transmitting and receiving information.
2. The procedure for consideration of such messages, interaction with the applicant, guarantees for ensuring the confidentiality of information about the applicant and protecting his rights are determined by the internal document of the Company.

4. Conducting internal investigations

1. In the event of receipt of the Notification or detection of signs of a corruption or corruption-related offense committed by a member of the management body, an official, an employee or a representative of the Company, or this Program, the Commissioner shall carry out a preliminary check of the received (revealed) information in accordance with the requirements of the current legislation and internal documents of the Company.

2. If the received (detected) information on the commission of a corruption or corruption-related offence relates to the actions or inaction of the Company's manager, the Commissioner shall, without preliminary verification, send such information within three days to the entity authorised to review or investigate it, taking into account the jurisdiction, and send a copy of the relevant letter to the Central Anti-Corruption Bureau, if it is not an entity authorised to review the information.

The received (discovered) information is also sent to the General Meeting of the participant.

3. In case of receipt of a Notification or detection of signs of a corruption or corruption-related offence by the Commissioner or this Program, a preliminary verification of such information shall be carried out in accordance with the Company's internal documents.

4. Based on the results of the preliminary check, the following decision is made:

1) take measures to prevent the detected violation;

2) appoint an internal investigation in case of confirmation of the (revealed) facts set out in the Notification or the need for further clarification of their reliability;

3) in case of detection of signs of a corruption or corruption-related offense, immediately, within 24 hours, in writing, notify the specially authorized entity in the field of combating corruption about it;

4) close the proceedings in case of non-confirmation of the (revealed) facts set out in the Notification.

5. The purpose of the internal investigation is to verify the factual data on the possible commission of a corruption or corruption-related offense.

6. The term for conducting an internal investigation must exceed 30 (thirty) calendar days from the date of completion of the preliminary audit. If it is impossible to verify the notified (revealed) information within the specified period, the Head of the Company extends the period of internal investigation up to 45 days.

7. The procedure for conducting internal investigations is determined by the Company.

8. The Commissioner has access to the materials of the conducted internal investigations, which are kept for at least 5 years.

5. Disciplinary liability for violation of this Program

1. For violation of the provisions of this Program, the Company's employees are subject to disciplinary measures in accordance with the law, the Company's internal labor regulations, and the provisions of labor contracts.

2. The Head (executive body) of the Company ensures that measures are taken for the commission of a corruption or corruption-related offense.

VIII. Supervision, control, amendments to this Program

1. Supervision and control

1. The Commissioner supervises and constantly monitors compliance with this Program by the founders (participants), the Head, members of management bodies, officials at all levels, employees and representatives of the Company.

2. The Commissioner exercises supervision and control over compliance with this Program by:

1) reviewing and responding to Notifications;

2) carrying out inspections of the activities of the Company's employees in the implementation (realization) of this Program;

3) conducting inspections of organizational and administrative documents, transactions, other documents of the Company provided for by this Program, as well as their projects for the presence of corruption risks;

4) carrying out periodic monitoring of the implementation of this program.

The Company may determine the procedure for carrying out scheduled and unscheduled inspections of the activities of the Company's employees, the procedure for conducting document checks, as well as additional forms of supervision and control over compliance with this Program, taking into account the specifics of its activities.

3. If during the supervision or control over the observance of this Program, the Commissioner reveals signs of a corruption or corruption-related offense, he initiates an internal investigation before the Head of the Company in the manner prescribed by this Program and internal documents of the Company.

2. Amendments to this Program

1. The Head of the Company ensures the organization of feedback mechanisms and other internal processes aimed at maintaining and continuously improving this Program.

2. This Program is revised in the following cases:

1) according to the results:

assessment of corruption risks in the Company's activities;

implementation of supervision and control over compliance with this Program, as well as evaluation of the results of the implementation of the measures provided for by it;

2) in case of amendments to the legislation, including anti-corruption, affecting the activities of the Company;

3) in case of changes in the organizational structure and business processes of the Company (if necessary).

3. The Commissioner, as well as the founders (participants), the Head (executive body), officials of all levels, employees of the Company may be the initiator of making amendments to this Program.

4. Proposals for making amendments to this Program are submitted to the Commissioner, who studies and systematizes them.

5. Once a year, the Commissioner provides the Head of the Company with a summary of proposals for making amendments to this Program and provides his recommendations on their consideration or rejection.

6. The Head of the Company, having received from the Commissioner a summary of proposals for amendments to this Program, initiates an open discussion by employees (staff) and founders (participants).