

APPROVED by
Resolution of the Board of Directors of
MTS Center for Artificial Intelligence LLC
Minutes No. _____

Policy
“Compliance with Anticorruption Legislation”

Moscow, 2021

This Policy establishes **key principles** and **requirements** for compliance with the applicable anticorruption legislation, defines the areas of corruption risks and establishes approaches to their overcoming and/or mitigation at MTS Center for Artificial Intelligence Limited Liability Company (hereinafter referred to as the “Company”). The Policy addresses the risks of bribery and corruption in both the public and private sectors.

By implementing this Policy, the Company sets the **following goals**:

- to establish the standards of responsible business behavior, to implement and develop best corporate governance practices;
- to demonstrate the Company's commitment to the principles of legality, transparency and social responsibility;
- to outline the principles aimed at preventing any form of corruption and compliance with the requirements of the Applicable Anticorruption Legislation in the course of conduction of business activity by the Company in any country in the world;
- to raise the level of corporate compliance culture in the Company and MTS Group, as well as to raise awareness of the risks of corruption and to assist in clarifying and observing the rules.

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1. DEFINITIONS OF TERMS AND ABBREVIATIONS

Name of the term	Abbreviation	Term definition (abbreviation expansion)
Applicable definitions:		
Anticorruption Clause	ACC	Obligations, warranties and representations of the party/parties to comply with the applicable anticorruption legislation.
Anticorruption Compliance (Anticorruption Compliance Program)		A system of actions and procedures developed by the Company for the purposes of ensuring compliance with the requirements of the applicable anticorruption laws.
Interaction with Public Officials		Any contact (regardless of its format and duration) with a public Official or a governmental Organization.
Governmental Organization		Any governmental authority of the Russian Federation and foreign states, their constituent entities (including government ministries, services, agencies, government departments and their structural units) and local authorities; any political party; all legal entities directly or indirectly controlled by the state (Russian or foreign); legal entities whose activities are perceived by society as the exercise of a public function for the state, except for the fulfillment of legal requirements; international governmental Organizations.
Public Official	PO	Any Russian or foreign, appointed or elected person holding or filling any position in the legislative, executive, administrative or judicial body or international organization; any person performing any public role for the state, including roles for a governmental institution; leading politicians, officials of political parties, including candidates for political posts, ambassadors, influential functionaries in nationalized industries or natural monopolies; managers and employees of state institutions, including doctors, military personnel, municipal employees, etc.; persons who are known to be related to a state official by kin or in terms of friendly or business relationships, and/or acting on behalf of and/or for the benefit of a PO.
Bribe-Giving		A corrupt practice in the form of a transfer of any (valuable thing) to PO personally or through an intermediary (including the transfer of a bribe at the direction of an official to the other individual or a legal person).
Business Hospitality		The Company's expenses to welcome and serve representatives of other companies (including foreign companies), which participate in business events in order to establish and (or) maintain mutual cooperation, as well as similar expenses borne by another person for the Persons Covered by the Policy. Business hospitality includes entertainment expenses and other entertainment expenses. Business hospitality of the Company includes expenses for: <ul style="list-style-type: none"> • business breakfasts, lunches and dinners, including formal receptions, snacks and drinks; • travel and accommodation expenses related to business breakfasts, lunches, dinners, cultural and entertainment or professional events; • all forms of cultural and entertainment events, such as invitations (tickets) to sports, theater and cultural events or events organized under sponsorship of MTS (if such events are held outside the MTS Group); • expenses related to payment for visiting external (outside MTS group) professional events, such as conferences, trade exhibitions, training events, etc.
Abuse of Powers		A corrupt practice in the form of use by a person performing managerial functions in a commercial or other organization of its powers contrary to the legitimate interests of this organization and in order to derive benefits and advantages for himself/herself or other persons, or inflict harm to other persons, if such act resulted in causing significant damage to the rights and the legitimate interests of individuals or organizations, or the interests of society or the government protected by law.
Commercial Bribery		A corrupt practice in the form of illegal transfer to a person performing managerial functions in a commercial or other organization of money,

Name of the term	Abbreviation	Term definition (abbreviation expansion)
		securities, other property, any other valuable thing, as well as illegal provision of property services to such person, provision of other property rights (including transfer of property at the direction of such a person or provision of a service of a property nature, or granting of property rights to the other individual or legal entity) for performing actions (omission to act) in favor of a person committing commercial bribery or other persons, if such acts (omission to act) are within the official powers of such a person or if such a person, due to his/her official position, may facilitate the specified acts (omission to act).
Company	MTS AI LLC, MTS AI	MTS Center for Artificial Intelligence Limited Liability Company.
Counterparty		Any legal entity or individual, including an individual entrepreneur, hired to perform actions on behalf of and (or) for the benefit of MTS Group or to deliver goods, perform work or provide services to MTS Group, including the procurement categories and the categories not related to procurement, including, but not limited to, sellers and suppliers; dealers and distributors; real estate owners and (or) holders; professional services providers; consultants; agents, intermediaries and other parties. As part of the due diligence in relation to counterparties, third parties that are recipients of payments shall also be deemed to be counterparties, regardless of whether such third parties are specified in the contract or not.
Conflict of Interest		A situation in which a Personal Interest (direct or indirect) of the Person Covered by the Policy, or the fact that such a Person or their Associates occupy positions in the management bodies of other organizations not being a part of MTS Group, affects or may affect proper, objective and impartial performance of their duties (exercise of powers) in the Company.
Corruption		An action undertaken by an individual or a legal entity that is related to offering funds, any financial benefits, advantages or value in the forms of giving and (or) taking a bribe or commercial bribery, mediation in bribery or commercial bribery, abuse of power and in any other forms that are recognized as corrupt, in order to influence any act (omission) of the taker and to induce to perform the employment duties in an inappropriate way and/or to obtain any improper commercial or other advantage or benefit and (or) to obtain reward for the inadequate performance of such duties.
Internal Regulation	IR	A document containing generally binding standards of conduct within the Company which the Company adopts within its competence in accordance with laws and other regulatory legal acts.
Facilitation Payment		Payments or other benefits that are not provided for by applicable law or other regulations and which are offered in order to facilitate or simplify the standard procedure (action) to which the payer has the right in accordance with the law, a contract or on other grounds.
Gift		Anything of value transferred or received by the Company, as well as by the Persons Covered by the Policy, at no cost.
Political sponsorship (financing of political activities)		Assistance in monetary or any other form, provided in support of Governmental Organizations (including parties), their employees, Public Officials or candidates for such positions.
Acceptance of a Bribe		A corrupt practice in the form of receiving by PO personally or through an intermediary of a bribe in the form of money, securities, other property or in the form of illegal provision of services of a property nature, provision of other property rights (including cases when a bribe is given to the other individual or a legal entity at the instructions of PO) for commission of actions (omission to act) in favor of the bribe giver or the persons represented by the bribe giver, if the specified actions (omission to act) fall within the official powers of PO, or if PO, by virtue of his/her official position, is able to facilitate the specified actions (omission to act), as well as for general patronage or connivance while performing official duties.
Intermediation in Bribery		A corrupt practice in the form of direct transfer of a bribe (valuable thing) on behalf of a bribe giver or bribe taker, or other assistance to a

Name of the term	Abbreviation	Term definition (abbreviation expansion)
		bribe giver and/or the bribe taker in achieving or implementing an agreement between them on receiving and giving a bribe.
Intermediation in Commercial Bribery		A corrupt practice in the form of direct transfer of the item of commercial bribery (illegal remuneration) on behalf of the person transferring the item used for commercial bribery, or the person receiving the item used for commercial bribery, or other assistance provided to such persons in achieving or implementing an agreement between them on the transfer and receipt of the item used for commercial bribery.
Applicable Anticorruption Legislation		Russian anticorruption legislation (Federal Law No. 273-FZ dated December 25, 2008 “On Combating Corruption”, the Criminal Code of the Russian Federation, the Civil Code of the Russian Federation, the Code of the Russian Federation on Administrative Offenses, as well as other Federal laws and by-laws of the Russian Federation providing for combating corruption), the FCPA (Foreign Corrupt Practices Act, the United States Congress Foreign Corrupt Practices Act of 1977), the Bribery Act 2010 (the United Kingdom’s Anti-Bribery Act, passed by the United Kingdom Parliament in 2010) and similar legislation of the states where the Company conducts its business activities.
Entertainment Expenses		The Company’s expenses to welcome and serve representatives of other companies (including foreign companies), which participate in negotiations in order to establish and (or) maintain mutual cooperation, and participants that arrived to meetings of the Board of Directors (Management Board) or other management body.
Employees		Individuals employed by the Company.
Valuables (anything of value)		All (tangible or intangible) things that have value for the recipient. Valuables may mean, including, but not limited to the following: cash; transfer of shares, bonds or any other property; payment of expenses; provision of services of any type; gifts; travel vouchers); business hospitality; employment; discounts, debt release; use of the desired telephone numbers (“nice-looking numbers”); job offers and offers of internships, including those for family members; donations to certain charitable organizations; any other transfer of goods, services, tangible or intangible assets that benefits the recipient. Any valuables of any value may be deemed illegal under Applicable Anticorruption Legislation.

2. GENERAL PROVISIONS

Corruption in any of its manifestations is inconsistent with the principles of the Company and damages its business reputation with the government, shareholders, customers, partners, competitors, Employees and society as a whole. Corruption is not only detrimental to the interests of the Company, but also affects every individual Employee. Corruption can lead to imposition of huge fines.

This Policy does not replace or supersede the legal provisions established by the Applicable Anticorruption Legislation, however, it may establish additional requirements.

If the Applicable Anticorruption Legislation establishes greater/other requirements as compared to the requirements set forth in this Policy, then greater/other requirements shall be followed.

In accordance with the requirements of the Applicable Anticorruption Legislation, the Company ensures the implementation of standards, decision-making procedures and compliance with the Internal Regulations, as well as best practices similar to those set out in the Policy in its controlled subsidiaries. The Company will use reasonable efforts to ensure that the uncontrolled subsidiaries fulfill the above requirements in order to comply with best anticorruption practices.

The Policy is **binding on**:

- all Employees,

- members of the management bodies and other bodies of the Company (Chief Executive Officer, Board of Directors, Auditing Commission) (hereinafter referred to as the members of the management bodies and other bodies of the Company),
- Counterparties – to the extent provided for by contracts (agreements) concluded with such persons/entities.

For the purposes hereof, all those obligated to comply with this Policy shall be hereinafter referred to as the **“Persons Covered by the Policy”**.

The Persons Covered by the Policy shall read the provisions hereof in hard copy against signature or, if technically possible, in soft copy using an analog of a handwritten signature, in accordance with the procedure effective in the Company.

3. APPLICABLE ANTICORRUPTION LEGISLATION

The Policy is prepared in accordance with the requirements of the Applicable Anticorruption Legislation, as well as the Charter, the Code of Business Conduct and Ethics and other IRs.

4. KEY PRINCIPLES

The Company adheres to the principles of compliance with the Applicable Anticorruption Legislation and ethical conduct in all types of business relations and regardless of the territory in which the Company pursues its business. The Company expects all persons acting on behalf of or for the benefit of the Company to comply with the Applicable Anticorruption Legislation.

4.1. Zero tolerance for corruption in all forms and manifestations

The Company expressly **declares zero tolerance for corruption** in any form and requires unconditional compliance with the key Policy principles and requirements from the Persons Covered by the Policy.

4.2. Tone-at-the-Top and Tone-from-the-Middle

The Company management, regardless of the level, including members of the management bodies, perform their official and/or corporate duties reasonably and in good faith being guided by the highest professional and ethical standards, rules of law and best corporate governance practices, putting the Company interests above their own.

Members of the management bodies and the Company management shall set the example for the standard of high ethical behavior for the Persons Covered by the Policy, as well as zero tolerance for any corruption forms and manifestations, which is an integral part of the corporate culture and daily business of the Company.

Members of the management bodies and the Company management, regardless of the level, shall be aware of the contents of the Anticorruption Compliance Program, shall allocate the necessary resources for its implementation and provide general monitoring over its implementation, discipline of performance and operational efficiency.

4.3. Reputation strengthening

The Company shall use reasonable efforts to prevent hiring individuals who are known to take or to have taken part in illegal activity or to be involved in activities contradicting the ethical standards established in the Company to Company executive positions or to the management bodies.

4.4. Regular risk assessment and mitigation

The Company shall take steps to identify, assess and reassess corruption risks on an annual basis, based on the results of which reasonable anti-corruption procedures proportional to the level and nature of the risks detected shall be developed and introduced.

4.5. Notification and training

The Company shall continuously monitor the changes in the Applicable Anticorruption Legislation and promptly notify all stakeholders about any relevant changes and trends.

The Company shall implement and maintain a training program for **Persons Covered by the Policy** on the requirements of the Applicable Anticorruption Legislation and corporate compliance controls through a specially designed training system: on a regular basis but in no event less than once per two (2) years in face-to-face, long-distance or other available format according to the Annual Training Plan available on the internal portal and the Intranet.

4.6. Monitoring the effectiveness of controls

The Company shall monitor effectiveness of implemented anticorruption controls, compliance with them and, if required, improve them.

The Company shall take steps to review the relevance of compliance controls with the subsequent update of the IRs containing such controls annually.

4.7. Audit and control

The Company shall ensure regular performance of internal and external audits of financial and economic activities, as well as continuous monitoring of the complete and accurate reflection of all business transactions in accounting and compliance with the Applicable Anticorruption Legislation and IRs, including the key principles and requirements established by this Policy.

4.8. Responsible officer and responsible unit, reporting

The Compliance Manager shall be responsible for the introduction and improvement of the Anticorruption Compliance Program, he/she shall have the experience and competencies required and have independence, powers and resources sufficient to perform his/her duties.

The Compliance Manager can, when necessary, participate in meetings of the collegial management bodies of the Company and provide explanations on the merits of the issues considered, if needed, and communicate his/her opinion to the members of collegial management bodies so that such bodies adopt informed resolutions at both strategic and operational levels.

The Compliance Manager may contact the Chief Executive Officer to convene a meeting of the Board of Directors. The effectiveness of the Anticorruption Compliance Program shall be assessed by the Board of Directors from time to time.

The Compliance Manager shall monitor compliance with the requirements of the Policy and Applicable Anticorruption Legislation, perform day-to-day management of the Anticorruption Compliance Program and its continuous improvement, as well as participate in the coordination of transactions with a high corruption risk.

5. CORRUPTION RISK AREAS

5.1. Interaction with Public Officials (POs) and Governmental Organizations (GOs)

Provision of valuables and benefits of any kind aimed at illegally influencing the decision-making process is forbidden all over the world. Relationships with POs and Governmental Organizations require particular caution as they are subject to Applicable Anticorruption Legislation and are associated with

increased risks related to bribery and corruption. This applies particularly to the preferences provided in favor of the POs.

It is forbidden to the Company and the Persons Covered by the Policy to provide any Valuables to the POs to illegally influence their official decision-making process in order to obtain, maintain or control business opportunities or commercial benefits for the Company. The Company may hire and (or) provide internships to the POs for a legitimate business purpose, subject to compliance with Applicable Anticorruption Legislation and the IRs.



It is forbidden to provide any Valuables to the POs to illegally influence their official decision-making process in order to obtain, maintain or control business opportunities or commercial benefits for the Company.

5.2. Gifts and Business Hospitality

Gifts and Business Hospitality can be used for building long-term partnerships between the Company and the persons with whom it interacts in the course of its business. However, Gifts and Business Hospitality can be used for illegal influence and be deemed a bribe or commercial bribery under certain conditions.

The Persons Covered by the Policy shall avoid Gifts and (or) Business Hospitality gestures that may influence independent decision-making process in the course of the Company business, conflict with the Company interests, or create an impression of such a conflict.

Any corruption scheme using Gifts and (or) Business Hospitality gestures, as well as **extortion** of such, are **unacceptable**.



Giving and receiving Gifts is permissible subject to observing the principles specified in the relevant IR.

5.3. Sponsorship, charity and corporate social responsibility

The company is committed to participating in corporate social responsibility (CSR) projects, to supporting the initiatives of governments and charitable organizations aimed at the welfare of the society and its development and contributes to the creation of equal opportunities in countries where the Company operates.

The Company **shall not finance** and shall **not participate** in any other way in charitable and/or sponsorship activities in order to obtain **any undue advantages** or preferences in connection with economic activities.

Participation of the Company in sponsorship and charitable activities is governed by the procedures developed and introduced in the Company.



Charity, sponsorship and corporate social responsibility activities targeted at illegal influencing are forbidden.

5.4. Participation in Political Activities

The Company shall **not finance** or **support** or **encourage** in any other way any political parties or their members, including candidates for political posts, their election campaigns or political events, as well as any political organizations or movements. The Company shall not allow any political contributions.

The Company does **not prohibit** the participation of Employees in political activities, unless it contradicts the Applicable Legislation and provided that the Employees do not use the Company property and name in such activities. If an Employee is applying for or is elected/appointed to the position in a Governmental Organization and intends to enter upon duty, such Employee shall first notify the Company.



*The Company does **not fund or participate** in political activities.*

5.5. Facilitation Payments

It is forbidden to make any payments or grant other benefits that are not provided for by applicable legislation and which are offered in order to facilitate or simplify the standard procedure (action) to which the Company has the right in accordance with the legislation, a contract or on other grounds.



*Any facilitation payments are **forbidden**.*

5.6. Payments through intermediaries or in favor of third parties

It is forbidden to make payments in favor of any third parties if it is known or there are certain reasons to believe that all or part of such payment will be used for corruption purposes.

The Company may conduct verification procedures regarding any third parties in order to prevent and/or identify the risks of the Company's involvement in corrupt practices.



*Any payments aimed at corruption are **forbidden**.*

5.7. Conflict of interest

The Company does not allow any situations in which the Personal Interest (direct or indirect) of the Person Covered by the Policy affects or may affect proper, objective and impartial performance of his/her duties (exercise of powers). The Persons Covered by the Policy shall comply with the rules regarding the conflict of interest.



Any Conflict of Interest is subject to mandatory settlement.

5.8. Transactions of acquisition and disposal of participation interest in other companies

The Company established special rules for compliance with the Applicable Anticorruption Legislation, including anticorruption verification procedures, for executing the transactions of mergers and acquisitions and (or) acquisition/sale of an interest in any legal entity. When assessing such a transaction, the Company examines the activities of the transaction subject and/or the partner in order to detect the risks of participation of such company or partner in corrupt practices committed by them earlier. This work includes, but is not limited to, due diligence prior to executing a transaction, as well as determination of the measures to be taken within the integration process after acquiring the asset.



*Transactions involving acquisition or sale of participation interests in other companies are subject to **mandatory anti-corruption expert examination**.*

5.9. Contractual Policy

5.9.1. Prohibition of non-contractual relationships

The Company prohibits to enter on its behalf and for its benefit into any non-contractual relations not provided for by the applicable legislation or IRs with any types of counterparties, including any written or oral agreements, including those in soft copy, not included in the main text of the contract with the Counterparty or its annexes, or in any other form, and not having passed the standard approval procedures adopted by the Company.

Any contract or agreement entered into by the Company in writing or electronically shall contain the entire conditions and arrangements subject to which such contract or agreement is entered into.

5.9.2. Due diligence on Counterparties

In relations with Counterparties, the Company shall use reasonable efforts to prevent any manifestations of corruption, both on behalf of and for the benefit of the Company. The Company shall require that its Counterparties adhere to the Applicable Anticorruption Legislation and the IRs related to it, as well as support the culture that bans any unethical conduct, both when participating in procurement procedures of the Company and subsequently conducting business with the Company. The Company developed the due diligence procedures on Counterparties and is implementing them.

5.9.3. Anticorruption clause

The Company may initiate inclusion of an anticorruption clause (ACC) in the contracts/agreements concluded based on the results of the due diligence on Counterparties to minimize the risk of corrupt practices performed by the Counterparty.



*Interaction with Counterparties shall be carried out on a contractual basis and with **mandatory due diligence** in accordance with the Company IRs.*

5.10. Marketing

The Company implements marketing activities to engage, keep and increase customer loyalty.

Any marketing activities shall be **forbidden** if they are aimed at:

- obtaining any unlawful business-related advantages or preferences;
- payment of remuneration to a PO, representative of commercial organizations and/or any other person for the purposes of influencing their actions (ensuring their inaction) and/or inducing them to inadequately discharge their official duties and/or for the purposes of gaining an unfair commercial advantage.



*It is **forbidden** to carry out marketing activities targeted at illegal influencing.*

5.11. Accounting

All financial operations, postings and records shall be reflected accurately, correctly and with the sufficient level of detail in the Company's accounting records, documented and available for audit.

The Company developed and implemented internal financial controls aimed at the following:

(1) execution of financial transactions in accordance with the general or special sanction of the management;

(2) accuracy and completeness of accounting records that enable drawing up statements pursuant to the applicable accounting (financial) reporting standards;

(3) access to management of assets only in accordance with the general or special sanction of the management;

(4) regular reconciliation of accounting records related to the value and composition of assets with the actual value and composition.

The Company shall appoint Employees responsible for the preparation and submission of complete and reliable accounting statements within the time frames provided for by the applicable law.



*Failure to comply with or an attempt of non-compliance with the procedures of internal financial control, misstatement or falsification of accounting statements of the Company shall be **prohibited**.*

6. REPORTING VIOLATIONS

6.1. Those employees, members of the management bodies and other bodies of the Company who became aware of or have reasons to believe that the principles or requirements of this Policy and Applicable Anticorruption Legislation are violated, shall immediately report this in any of the following ways:

- (1) to the direct supervisor or, if this report relates to the actions committed by the direct supervisor, to the superior manager (in any form);
- (2) to the Compliance Manager (in any form);
- (3) by sending an e-mail to the Unified Hotline at: external.hotline.mts@b1.ru;
- (4) via the Our MTS app (including anonymously);
- (5) by calling 8 800 234 44 18 (Russian Federation) or use toll-free telephone lines from a number of foreign countries, see the Unified Hotline website;
- (6) via the feedback form hotline-mts.b1.ru published on Our MTS corporate portal (anonymously or signed with your name);

The Counterparties can send a violation report in any of the following ways:

- (1) to the e-mail of the Unified Hotline at: external.hotline.mts@b1.ru;
- (2) by calling 8 800 234 44 18 (Russian Federation) or use toll-free telephone lines from a number of foreign countries, see the Unified Hotline website;
- (3) via the feedback form hotline-mts.b1.ru published on Our MTS corporate portal (anonymously or signed with your name).

6.2. The Company provides an independent and comprehensive review of all reports of violations of the Policy requirements pursuant to the IRs.

6.3. The Company prohibits any form of prosecution (retaliation) against the Persons Covered by the Policy who reported a violation in good faith, assisted in investigations and refused to participate in the activities contradicting the principles or requirements hereof and of the Code of Business Conduct and Ethics.

6.4. Any Person Covered by the Policy who has violated its requirements may be subject to retaliation up to dismissal and (or) termination of contracts in accordance with the provisions of these contracts and applicable legislation.

7. POLICY EXECUTION

The Persons Covered by the Policy, regardless of their position, shall be responsible for compliance with the principles and requirements of the Policy and Applicable Anticorruption Legislation, as well as for inadequate control of the actions of their subordinates that resulted in the Policy violations.

8. CONSULTATIONS

For consultations on the Policy application, one shall contact the compliance manager.

9. REFERENCE DOCUMENTS

- Federal Law No. 273-FZ dated December 25, 2008 “On Counteraction to Corruption”;
- Criminal Code of the Russian Federation No. 63-FZ dated June 13, 1996;
- Code of the Russian Federation on Administrative Offences No. 195-FZ dated December 30, 2001;
- Foreign Corrupt Practices Act 1977 (FCPA) as passed by the US Congress in 1977;
- The UK Bribery Act 2010 as passed by the Parliament of Great Britain in 2010;
- US Federal Sentencing Guidelines Manual, §8B2.1., 2010;
- The Bribery Act 2010 Guidance, 2011;
- A Resource Guide to the U.S. Foreign Corrupt Practices Act, 2020;
- Evaluation of Corporate Compliance Programs, U.S. Department of Justice Criminal Division, 2020;
- OECD Anti-Bribery Convention to combat bribery of foreign officials during international commercial transactions 1997;
- The United Nations Convention against Corruption, 2003;
- Convention of Criminal Liability for Corruption, 1999;
- Recommended Practice for the Development and Implementation of Actions to Prevent and Combat Corruption (Ministry of Labor and Social Security of the Russian Federation);
- Measures to Prevent Corruption in Organizations (Ministry of Labor and Social Security of the Russian Federation).

In the preparation of this Policy, recommendations and recommended practices were used as are contained in manuals of specialized international organizations, as well as best practices in the field of compliance function building.