



Anti-Corruption Policy

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JSC SUEK

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1. Terms, abbreviations and definitions

Terms, abbreviations and definitions are relevant at the time of approval of the document.

Term (abbreviation)	Definition
Company	JSC SUEK
Compliance Directorate	the division of the Consultant, which, in accordance with the agreement concluded with the Company, ensures the functioning of the Compliance system
Compliance system	an internal system for ensuring compliance with mandatory requirements, that is, a set of legal and organizational measures aimed at ensuring that the Company's activities comply with mandatory requirements and preventing the Company from violating mandatory requirements, including anti-corruption requirements
Consultant	a legal entity engaged to provide compliance services
Authority	established under the Russian law state bodies, local government bodies, state and municipal institutions, state non-budgetary funds, state corporations, state companies, public not-for-profit organizations, state and municipal unitary enterprises, business entities, in the supreme governing body of which is the Russian Federation, a constituent entity of the Russian Federation or a municipal formation has the right, directly or indirectly (through persons controlled by them) exercise more than 50% of the votes or in which the Russian Federation, a constituent entity of the Russian Federation or a municipal formation has the right to appoint (elect) the single executive body and (or) more than fifty percent of members of the executive board, joint-stock companies in respect of which the Russian Federation, constituent entities of the Russian Federation or municipal formations have the special right to participate in their management ("golden share"), as well as the Armed Forces of the Russian Federation, other troops and military formations of the Russian Federation
Employee	an individual engaged in labor relations with the Company
Senior Officer	an employee endowed with organizational and administrative powers in relation to other employees who are subordinate to him/her
Anti-Corruption Requirements	the requirements to the company's activities for the prevention of corruption established by the regulatory legal acts of the Russian Federation, as well as the measures (procedures) established by the Company's local regulatory acts aimed at compliance with these requirements

2. Applicable scope

2.1. Purpose of the document

- 2.1.1. Anti-Corruption Policy is adopted in order to fulfill the obligations of the Company to prevent corruption that were imposed on organizations by the legislation of the Russian Federation, and to develop in the Company a corporate culture of combating corruption.
- 2.1.2. Anti-Corruption Policy defines the Company's goals and principles in the field of combating corruption and measures taken by the Company to prevent corruption.
- 2.1.3. All the employees of the Company, regardless of their position (profession, specialty) must comply with the Policy, from its effective date.

3. General requirements

- 3.1. The Company proceeds from the inadmissibility of violations of generally accepted principles and norms of international law and international agreements of the Russian Federation, the Constitution of the Russian Federation, federal laws, other regulatory legal acts in the field of combating corruption and carries out all possible measures to prevent corruption.
- 3.2. The Company's goals in the field of combating corruption are:
 - identification and elimination of corruptive violation risks;
 - implementation of anti-corruption measures system and ensure the continuous functioning of this system.
- 3.3. The Company, management bodies of the Company:
 - state their official position before the authorities, other organizations and citizens that it is common business practice in the course of the Company's economic (entrepreneurial) activities to comply with anti-corruption requirements, in which any corruptive violation is inadmissible;
 - require all the employees to fulfill their labor (official) duties, including instructions from direct and higher managers, in compliance with anti-corruption requirements.
- 3.4. The Company when combating corruption is guided by the following principles:
 - legality of economic (entrepreneurial) activity;
 - involvement of all Company's employees, whose activities are associated with the corruptive violation risks, in the processes of managing such risks;
 - personal responsibility of employees for compliance with anti-corruption requirements.
- 3.5. When executing professional activities (fulfilling a labor function) in the Company, any employee is obliged to:
 - comply with the anti-corruption requirements;
 - prevent corruptive violations;
 - exclude the influence of personal interest and other interests on the proper, objective and impartial fulfillment of the labor function (exercise of powers);
 - when appointed to a position and during the performance of duties (fulfilling a labor function) in the Company, inform the Company about the employee's personal interest, which affects or may affect the proper performance of the employee's duties (fulfilling a labor function);
 - take measures set forth by Russian legislation and Company's local regulatory acts to prevent and resolve conflicts of interest.

The Senior Officer is obliged to:

- make all reasonable efforts to ensure that subordinate employees comply with the anti-corruption requirements, to prevent them from committing corruptive violations; give a lead to the subordinate employees and actively promote the fulfillment of anti-corruption requirements;
- ensure and support the subordinate employees participation in activities aimed at maintaining awareness (informing, training) about the anti-corruption requirements, as well as in activities of testing the knowledge of employees on these issues.

The Senior Officer is responsible for not making all reasonable efforts to prevent actions or inaction of subordinate employees that violate the anti-corruption requirements.

4. Measures to prevent corruption

- 4.1. Measures implemented by the Company to prevent corruption include:
 - determination of units (officials) responsible for the prevention of corruptive violations;

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- cooperation of the Company with law-enforcement authorities;
 - development and implementation of standards and procedures aimed at ensuring compliance with anti-corruption requirements, including the establishment of requirements for corporate behavior of employees;
 - setting in labor contracts or job descriptions the obligations of employees to comply with anti-corruption requirements;
 - informing the authorities, consumers and business entities about the Company's commitment to the anti-corruption policy;
 - maintaining employees awareness of anti-corruption requirements;
 - measures to prevent and resolve conflicts of interest;
 - a system for reporting violations of anti-corruption requirements;
 - expert support of the Company's employees on the application (interpretation) of anti-corruption requirements.
 - conducting internal audits and investigations;
 - monitoring the state of the Company's corruption prevention system.
- 4.2. Responsible for the prevention of corruptive violations in the areas defined by this Policy are:
- the Corporate Security Directorate;
 - the Human Resources Directorate;
 - the Compliance Directorate.
- 4.3. The Company's cooperation with law-enforcement authorities is carried out in order to prevent and suppress corruptive violations, mitigate and (or) eliminate the consequences of corruptive violations.
- Cooperation of the Company with law-enforcement authorities is carried out in the form and procedure established by Russian law, by sending notifications (applications) to law-enforcement authorities about corruptive violations, providing law-enforcement authorities with information and documents at their requests (requirements), other interaction with law-enforcement authorities in the course of proceedings on cases of administrative offenses and criminal proceedings.
- The organization of cooperation between the Company and law-enforcement authorities is entrusted to the Corporate Security Directorate.
- 4.4. The Compliance Directorate ensures:
- development and implementation of local regulations of the Company (standards and procedures) in the field of combating corruption, including requirements for corporate behavior of employees;
 - informing the authorities, consumers and business entities about the Company's commitment to the anti-corruption policy;
 - informing employees about anti-corruption requirements;
 - maintaining employees awareness of anti-corruption requirements;
- and also exercises other powers provided for by this Policy and other Company's local regulatory acts.
- The Compliance Directorate has the right to submit proposals to the Chief Executive Officer of the Company on the adoption of organizational measures to ensure compliance with anti-corruption requirements.
- 4.5. The Human Resources Directorate ensures setting the obligations of employees to comply with anti-corruption requirements in labor contracts or job descriptions.
- 4.6. Measures to prevent and resolve conflicts of interest are implemented in the Company in order to:

- exclude situations when persons exercising certain functions (powers) in the Company use their functions (powers) under the influence of personal interest and contrary to the legitimate interests of society, the state and the Company;
- ensure constant and sufficient control for such situations do not violate the legitimate interests of society, the state and the Company.

Procedures aimed at preventing and resolving conflicts of interest are determined by the Company's local regulatory acts.

- 4.7. The system for reporting violations in the field of combating corruption operates in the Company through special communication channels designed for employees and other persons to send messages about committed or possible corruptive violations.

When an employee becomes aware of violation or a threat of violation of anti-corruption requirements, the employee is obliged to immediately inform the Senior Officer, if necessary, the Corporate Security Directorate and (or) the Compliance Directorate.

- 4.8. If an employee has doubts about the compliance with anti-corruption requirements of the actions that he performs or intends to perform (including as part of the labor function assigned to him/her or on behalf of his/her Senior Officer), or his/her inaction, the employee must:

- bring his/her doubts to the attention of his/her Senior Officer and get instructions from him/her on further actions, and if necessary (including if the employee's appeal to his/her Senior Officer was unsuccessful or if the employee disagrees with his/her Senior Officer's instructions on further actions) - report the situation to a higher manager, or the Corporate Security Directorate, or the Compliance Directorate;
- if the employee's action (inaction) being committed or planned does not comply with anti-corruption requirements, withhold action (stop such inaction).

An employee will not be brought to disciplinary liability for refusing to act (continue inaction), provided that the employee has notified the Company in advance, or if the legality of such refusal of the employee is confirmed by a court or an authority that exercise state control (supervision) in the relevant field.

- 4.9. Expert support is provided to employees in order to assist them in resolving complex (controversial) issues of application (interpretation) of anti-corruption requirements.

Expert support is provided by the Compliance Directorate and may include:

- preparation of conclusions;
- individual consultations (oral or written).

Expert support is provided at the request of the employee within a period of not more than 5 working days from the date of receipt of the request. This period may be extended if it is necessary to request and (or) study additional information, conduct consultations (discussions).

- 4.10. Internal audits are carried out in order to establish compliance of the Company's activities with anti-corruption requirements, monitoring the implementation of action plans for combating corruption.

Internal investigations are carried out in order to establish the reliability of information about the violation by the Company (employees) of anti-corruption requirements, identify persons guilty of violating anti-corruption requirements, and bring them to legal responsibility, and take measures to prevent corruption offences.

- 4.11. Monitoring of the Company's anti-corruption measures system is provided by the Compliance Directorate at least once a year using:

- results of internal audits and investigations;
- information received through the whistleblowing system;
- information received from the authorities;

- messages distributed in the media, on the Internet, as well as published or distributed in any other way.

Information on the results of monitoring of the anti-corruption system is submitted by the Compliance Directorate to the Chief Executive Officer of the Company.

Based on the results of monitoring of the anti-corruption measures system, steps can be taken to improve the anti-corruption system, including:

- changing the Company's anti-corruption policy, the Company's local regulatory acts in the field of combating corruption;
- implementation of additional procedures or engaging additional resources for the prevention of corruptive violations;
- changing the whistleblowing system, the processes of conducting internal audits and investigations, and the reporting system.

If necessary, the results of monitoring the anti-corruption measures system are sent by the Compliance Directorate to the Corporate Security Directorate, the Human Resources Directorate, and heads of other departments with suggestions of measures to adjust anti-corruption procedures. Consideration of the suggestions of the Compliance Directorate is carried out by the heads of the Corporate Security Directorate, the Human Resources Directorate, and heads of other divisions with the participation of the Head of the Compliance Directorate within 10 working days.

5. Standards and procedures to ensure compliance with anti-corruption requirements

- 5.1. In order to ensure compliance with anti-corruption requirements and preventing corruptive violations, the Company implements standards and procedures that are mandatory in the course of certain business processes associated with the risks of corruptive violations.
- 5.2. The Company's cooperation with the authorities is carried out exclusively in the forms and limits permitted by law in order to ensure the rights and legitimate interests of the Company in the provision of state and municipal services, the exercise of state control (supervision) and municipal control, bringing to administrative responsibility, granting licenses and other permits, accreditation, conformity assessment of products, other forms of assessment and examination, as well as in order to eliminate gaps (contradictions) in legal regulation (including by promoting the interests of the Company, public associations of entrepreneurs).

Employees authorized by the Company to cooperate with authorities are obliged to comply with the requirements established by laws and other regulatory legal acts of the Russian Federation for the procedure for providing state (municipal) services, exercising state control (supervision), municipal control, bringing to administrative responsibility, granting licenses and other permits, accreditation, conformity assessment of products, other forms of assessment and examination, the exercise of other powers by authorities.

The interests of the Company, public associations of entrepreneurs are promoted when the authorities consider issues of legal regulation in the field of economic activity by sending appeals to the authorities, substantiating them, participating in their discussion, including using tools created in accordance with the regulatory legal acts of the Russian Federation (mechanisms) public discussion of draft regulatory legal acts, assessment of the regulatory impact of draft regulatory legal acts, assessment of the application of mandatory requirements, other forms of interaction between authorities and the expert and business community.

- 5.3. The Company's cooperation with consumers and business entities is carried out solely for the purpose of conducting legitimate business activities by making and executing transactions not prohibited by the Russian law and performing other legally significant actions within the limits allowed by the Russian law.

The Company makes all reasonable efforts to prevent corruptive violations in the Company's cooperation with consumers and business entities by establishing (by the Company's local regulatory acts) the procedure for:

- making and executing transactions (concluding contracts), including the procedure for making purchases for the Company needs;
- carrying out financial transactions, maintaining accounting records (including in order to prevent the preparation of unofficial reports and the use of forged documents).

- 5.4. Representation expenses (expenses associated with the official reception and service of other organizations representatives, including representatives of government bodies and business entities), as well as gifts and signs of business hospitality are allowed by the Company in order to establish and (or) maintain business relations and cooperation, presentation (advertising) goods (works, services) of the Company, as well as a manifestation of generally accepted comity, in compliance with the prohibitions and restrictions established by the Russian law, including anti-corruption requirements.

The purpose of representation expenses, gifts and business hospitality cannot be a bribe, commercial bribery, other illegal remuneration to officials of government bodies, foreign officials, officials of public international organizations, as well as persons exercising administrative functions in commercial and other organizations, or other illegal target.

Company's local regulatory acts may establish representation expense rates, maximum amounts (marginal cost) and (or) frequency of gifts and business hospitality, unified procedure and requirements for registration of representation expenses incurred, a procedure for disclosing information on receipt of gifts (business hospitality) by employees in the performance of their labor duties (powers) in the Company, as well as other rules for the exchange of business gifts and hospitality.

- 5.5. The Company's cooperation with public associations is carried out in the forms and within the limits provided for by laws and other legal acts of the Russian Federation.

The Company does not participate in creation and activities of political parties and other public associations of foreign states, in activities of organizations, unions and associations created by these parties and other public associations, in activities of public associations included in accordance with the Russian law in the register of non-profit organizations performing foreign agent functions, as well as in the activities of other organizations prohibited by federal law.

The Company does not allow violation of the right of employees to associate, including the right to create trade unions to protect their interests, compel employees to join or stay in any association, to participate in the activities of political parties and public associations.

The Company recognizes the right of employees to participate in political activities, activities of public associations, if such participation does not contradict the Russian law and anti-corruption requirements, and also provided that such participation is not carried out on behalf of and not in the interests of the Company and does not bind the Company any obligations, does not express on behalf of the Company an opinion on any issues of public life.

Employees are prohibited on behalf of or in the interests of the Company to make contributions or donations to public associations or provide funds or other property to public associations for holding events or otherwise supporting the activities of public associations without the direct and officially expressed consent of the Company.

- 5.6. The Company carries out charitable activities (voluntary activities for the disinterested (gratuitous or on preferential terms) transfer of property to citizens or legal entities, including funds, disinterested performance of work, provision of services, provision of other support) and sponsorship (providing funds or ensuring the provision of funds for organizing and (or) holding a sports, cultural event, creating and (or) broadcasting a television or radio program or creating and (or) using another result of creative activity) in accordance with the requirements of the current legislation of the Russian Federation.

Donations can be made by the Company to citizens, medical, educational organizations, social service organizations and other similar organizations, charitable and scientific organizations, foundations, museums and other cultural institutions, public and religious organizations, other non-profit organizations in accordance with the law, as well as to the state and municipal formations for generally useful purposes, including to promote activities in the field of education, science, culture, art, enlightenment, in the field of prevention and protection of citizens health, in the field of physical culture and sports (with the exception of professional sports) and for other purposes determined by Russian law.

The purpose of transfer by the Company (on behalf of the Company) of funds and other property to other persons in the course of charitable activities or as a sponsor cannot be a bribe, commercial bribery or other illegal remuneration to government officials, foreign officials, officials of public international organizations, and also to persons exercising administrative functions in commercial and other organizations, or other illegal purpose.

Employees and other persons who, on behalf of the Company, carry out charitable activities or activities as a sponsor must:

- transfer funds or other property of the Company only to persons who attract resources for the purposes determined by the Company and that are specified in paragraph two of this item;
- make all reasonable efforts to exercise due diligence, including examining the information about the person to whom the funds and other property are transferred, in order to make sure that the transfer of funds and other property to a certain person complies with the law;
- not allow the transfer of funds and other property of the Company as bribes, commercial bribery or other illegal remuneration to officials of government bodies, foreign officials, officials of public international organizations, as well as persons exercising administrative functions in commercial and other organizations.

5.7. In order to prevent corruptive violations, the Company makes all reasonable efforts to comply with the procedure established by the Russian law for concluding labor and civil law contracts with citizens who have held positions in the state or municipal office, including:

- the Company obtains from persons entering the work, reliable information about the last place of work;
- the Company sends messages about the conclusion of labor and civil law contracts to representatives of state and municipal employers at their last place of work.

Realization of measures to comply with the procedure established by Russian law for concluding labor and civil law contracts with citizens who have held positions in the state or municipal office is assigned to the Human Resources Directorate.

6. The procedure for familiarizing employees with the Policy

- 6.1. Employees with whom labor contracts were concluded prior the enactment of the Policy are subject to familiarization with the Policy within one month from the Policy effective date.
- 6.2. Persons newly hired by the Company are subject to familiarization with the Policy before concluding a labor contract.
- 6.3. The duty to familiarize the employees and newly hired persons with the Policy is laid upon the Human Resources Directorate.
- 6.4. The Policy is published in the internal electronic document flow system, on the internal and external web-page of the Company for review by all interested parties.

Annex 1. Normative references

The list of sources is current at the time of approval of the document. When working with the document, you should check the relevance of sources and use their latest approved revisions or revisions of documents published in replacement.

No.	ID	Source name
1.		Constitution of the Russian Federation
2.	dated December 30, 2001 No. 197-FZ	Labor Code of the Russian Federation
3.	dated 13.06.1996 No. 63-FZ	Criminal Code of the Russian Federation
4.	dated December 30, 2001 No. 195-FZ	Code of Administrative Offenses of the Russian Federation
5.	dated December 25, 2008 No. 273-FZ	Federal Law "On Combating Corruption"
6.	dated July 31, 2020 No. 247-FZ	Federal Law "On Mandatory Requirements"
7.	dated July 31, 2020 No. 248-FZ	Federal Law "On State Control (Supervision) and Municipal Control in the Russian Federation"
8.	dated 17.01.1992 No. 2202-1	Federal Law "On the Prosecutor's Office of the Russian Federation"
9.	dated July 27, 2010 No. 210-FZ	Federal Law "On the organization of the provision of state and municipal services"
10.	dated 06.03.2006 No. 35-FZ	Federal Law "On Combating Terrorism"
11.	dated July 25, 2002 No. 114-FZ	Federal Law "On counteracting extremist activity"
12.	dated 07.08.2001 No. 115-FZ	Federal Law "On counteracting the legalization (laundering) of proceeds from crime and the financing of terrorism"
13.	No. 82-FZ dated May 19, 1995	Federal Law "On Public Associations"
14.	dated 11.07.2001 No. 95-FZ	Federal Law "On Political Parties"
15.	dated 06.12.2011 No. 402-FZ	Federal Law "On Accounting"
16.	ISO 37301:2021	International standard "Compliance Management Systems. Requirements with Guidance for Use"
17.	ISO 37001:2016	International Standard "Anti-bribery Management Systems - Requirements with Guidance for Use"