

	Title Anti-Corruption Policy of the Gazprom EP International B.V. Group Companies	Reg. No. 112	
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Responsible Person A.Y. Kurashvili Deputy Head, Contracts Division	Approval Date 11 February 2021		


1. General Provisions

- 1.1. The Anti-Corruption Policy of the Gazprom EP International B.V. Group Companies (the "Policy") is an underlying document governing the prevention and combating of corruption.
- 1.2. The Policy is in line with:
 - Good Practice Guidance on Internal Controls, Ethics, and Compliance adopted by the OECD Council on 18 February 2010;
 - ISO 19600:2014 ISO 19600, Compliance Management Systems — Guidelines;
 - ISO 37001:2016 Anti-Bribery Management Systems — Requirements with Guidance for Use;
 - National laws applicable to the Group Companies;
 - Anti-Corruption Policy of PJSC Gazprom approved by Resolution No. 2846 of the Board of Directors on 15 November 2016.
- 1.3. The Policy aims to develop a single, transparent approach to the fulfillment by the Group Companies of their preventive anti-corruption obligations to the benefit of civil society, shareholders, and employees.
- 1.4. The Policy reflects the commitment of the management and employees of the Group Companies to the ethical standards of conducting a legitimate, open, and honest business, improving the corporate culture, adhering to the best corporate governance practices, and maintaining a good business reputation.
- 1.5. The Policy pursues the following objectives:
 - Comply with applicable anti-corruption laws;
 - Lay the ground for improved internal anti-corruption regulations in the Group Companies;
 - Develop an effective preventive anti-corruption mechanism in the Group Companies;
 - Ensure investors, counterparties, members of the management bodies, and employees share a company-wide anti-corruption consciousness and common understanding of the Group Companies' negative stand toward corruption in all of its forms and manifestations.
- 1.6. This Policy applies to all the Gazprom EP International B.V. Group Companies.

2. Terms and definitions

Group Company	means Gazprom EP International B.V. and/or its subsidiaries, partially or fully, directly or indirectly controlled by Gazprom EP International B.V., and their separate structural units (branch offices, representative offices, and project management offices). For the purpose of this definition, "control" means direct or indirect ownership of more than fifty percent (50%) of total interest.
Conflict of Interest	means a situation where the personal interest of an employee affects or may affect him/her fulfilling his/her job duties objectively and impartially and where there is or may arise a conflict between the personal interest of an employee and the legitimate interests of the Group Companies, which can be detrimental to the legitimate interests of the Group Companies.
Corporate Service Center (CSC)	means the Branch Office of the private limited liability company Gazprom EP International Services B.V. in Saint Petersburg.
Corruption	means any abuse of office, giving a bribe, receiving a bribe, abuse of authority, commercial bribery or other illegal use by a person of his/her official position contrary to the legitimate interests of the Group Companies for the purpose of deriving profit in the form of money, valuables, other property or property-related services, other property rights for oneself or third parties or illegal provision of such profit to the specified person by others.
Corruption Offence	means an unlawful offense (act or omission) with signs of corruption, for which disciplinary, administrative, penal, or civil liability is established by applicable national law.

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Prevention of Corruption means the actions the Group Companies take to introduce elements of corporate culture, the organizational structure, rules, and procedures governed by internal normative documents that allow preventing corruption offenses.

Combating of Corruption means the actions the Group Companies take within the limits of their mandate to:

- Prevent corruption and, i.a., ascertain and subsequently root out the causes of corruption (safeguard against corruption);
- Trace, prevent, control, uncover, and investigate into corruption offences (anti-corruption);
- Mitigate and/or eliminate the effect of corruption offences.

3. Competence of the Preventive Anti-Corruption Management Bodies

- 3.1. The Management Board of Gazprom EP International B.V. organizes and executes general governance over the actions the Group Companies take to prevent and combat corruption, as well as regularly reviews the reports of corresponding executive bodies on their actions to prevent and combat corruption.
- 3.2. The managing directors of the Group Companies assign powers, duties, and responsibilities for preventing and combating corruption between their employees and units of the Group Companies and ensure measures are taken to enforce the principles and requirements of the Policy, including the appointment of persons responsible for the development, implementation, and supervision of anti-corruption procedures.
- 3.3. The Legal Department at the CSC, in conjunction with the Corporate Security Department at the CSC, drafts proposals on the improvement of internal control procedures to combat corruption and send them to the Management Board of the Company for consideration.

4. Principles for the design of a Preventive Anti-Corruption Risk Management and Internal Controls System

The Preventive Anti-Corruption Risk Management and Internal Controls System is based on the following principles:

- a) Compliance with applicable national law.
Anti-corruption measures must comply with the current national law applicable to each Group Company and other applicable regulations.
- b) Tone at the top.
The Management Board of Gazprom EP International B.V. plays a pivotal role in building a corruption-intolerant culture and a preventive anti-corruption system. It also provides reliable, explicit, and tangible support to programs and measures involving internal controls, ethics, and compliance aimed to prevent and trace acts of corruption.
- c) Involvement of people.
Employees at the Group Companies must be aware of the provisions of applicable anti-corruption laws. Employees are actively involved in developing and deploying anti-corruption standards and procedures declared in the Policy.
- d) Proportionality between anti-corruption procedures and corruption risks.
A package of measures must be developed and deployed to allow for a less likely involvement of Group Company managers and employees in corrupt activities subject to existing corruption risks.
- e) Liability and inevitability of punishment.
Punishment must be inevitable for all employees, regardless of their position, seniority, and other conditions, who have committed a corruption offence at the workplace. Management is personally responsible for the implementation of the Policy.
- f) Open business.
Anti-corruption business standards adopted by the Group Companies must be made known to counterparties, partners, and the public.
Corruption is repudiated in any form or manifestation, including those involving relations with counterparties, public authorities, political parties, employees, et al.
- g) Ongoing supervision and regular monitoring.
Ethics and compliance programs and measures undergo regular improvements with a view to an evaluation and enhancement of their effectiveness in preventing and tracing acts of corruption with consideration to recent developments related thereto and the evolving international and industrial standards.

5. Package of Preventive Anti-Corruption Measures

- 5.1. Ensure risks are identified and assessed and areas with inherent corruption risks are monitored.
 - a) Conducting targeted risk sessions to identify risks in the corruption field and factors contributing to

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- the implementation of corrupt schemes, with the involvement of all interested persons of the Group Companies. Formation of an appropriate register of risks and measures to manage them.
- b) Evaluate, approve, and follow up on transactions with corruption risks in accordance with procedures established by internal normative documents in the Group Companies.
- 5.2. Provide coordination and ensure the preventive anti-corruption measures are designed and deployed:
- a) Development of company-wide ethic values across the Group Companies.
- b) Advice for Group Company employees on the deployment of preventive anti-corruption measures.
- c) Guidance for Group Company employees on the improvement of preventive anti-corruption measures.
- d) Development of internal normative documents for the deployment of preventive anti-corruption measures, including those governing the procedures:
- Communication by an employee of any offence with signs of corruption known to him/her that other employees, counterparties, et al. have committed and the procedure for such communication;
 - Communication by an employee of anyone inducing him/her to commit corruption offences and the procedure for such communication;
 - Protection for employees who communicate any corruption offences in the operations of the Group Companies.
- e) Anti-corruption assessment of internal normative documents in the Group Companies.
- f) Collection and analysis of information on any offences with signs of corruption identified by inspections/investigations or any information obtained via channels of communication providing details of any offences (ukz-info@gazprom-international.com or call: +7 (812) 777-00-05).
- g) Adoption of measures to avoid or solve any conflict of interest, including those bringing about the balance between the interests of the Group Companies and those of an employee in the settlement of a conflict of interest.
- h) Adoption of measures to prevent corruption in the procurement of goods, works, and services by the Group Companies.
- i) Conduct (coordination of or participation in) of a comprehensive investigation into offences showing signs of corruption.
- j) Preparation of reports on the results of the preventive anti-corruption measures.
- k) Evaluation of proposals on the improvement of anti-corruption procedures.
- l) Studying and applying the existing experience of business partners in the field of preventing and combating corruption.
- 5.3. Keep track of and evaluate changes in anti-corruption laws/jurisprudence in corruption-related cases (which includes studying international experience).
- 5.4. Provide employees with updates and training on compliance with anti-corruption law, the requirements of the internal normative documents of the Group Companies governing the prevention and combating of corruption, and anti-corruption measures.
- 5.5. Encourage employees to unconditionally comply with the Policy, as well as the standards and procedures for the prevention of corruption offences established by the Corporate Ethics Code.
- 5.6. Ensure internal controls that allow preventing and combating corruption and related risks are managed as follows:
- Corruption risks, as well as areas (business processes) and operations exposed to corruption risks are revealed and evaluated;
 - The effectiveness of existing preventive anti-corruption measures is evaluated;
 - Existing preventive anti-corruption measures are improved and new ones are developed in areas (processes) and operations exposed to corruption risks;
 - monitoring the implementation of the planned measures to prevent and combat corruption, assess their effectiveness;
 - A list is made to include positions whose functions are related to elevated corruption risks across the Group Companies.

6. Anti-Corruption Standards and Their Enforcement

- 6.1. The Group Companies are governed by a Corporate Ethics Code that uses Europe's and Russia's best corporate governance practices. The Code establishes corporate values and defines major principles and business conduct rules based on such values that minimize conflicts of interests and acts of corruption. The responsibility for enforcing the requirements and provisions of the Corporate Ethics Code rests upon a standing Corporate Ethics Code Commission.
- 6.2. Policy-enforcing mechanisms are included in, i.a.:
 - Risk Management Policy of Gazprom EP International B.V.;
 - Budgeting Regulation of the Gazprom EP International B.V. Group Companies;
 - Internal Audit Regulation of the Gazprom EP International B.V. Group Companies and other internal normative documents.

7. Employees' Liability for Non-compliance with the Policy

- 7.1. In organizing risk management and internal controls to prevent and combat corruption, the Group Companies are guided by a principle establishing that punishment is inevitable for employees who have committed a corruption offence, regardless of their position.
- 7.2. Liability for corruption offences includes disciplinary, administrative, and criminal liability in accordance with local laws.
- 7.3. A Group Company investigates into each known fact of corruption within the scope permitted by applicable national law.

8. Revision and Amendments

The Policy may be amended in accordance with the procedures established by the Group Companies if:

- The Policy needs to be aligned with any change in applicable laws;
- Preventive anti-corruption measures need to be improved across the Group Companies.