

Revision Ревизия 01	Regulation on Anti-Bribery and Corruption, Gifts and Hospitality in Salym Petroleum Development N.V.	 САЛЫМ ПЕТРОЛЕУМ ДЕВЕЛОПМЕНТ
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Revision Change Details

Информация о внесении изменений

Revision Ревизия	Location of Change Характер изменения	Brief Description of Change Краткое описание изменения
	Document transformation to SPD-CMS-STD-00001 "Anti-Bribery and Corruption, Gifts and Hospitality Standard"	The document was amended as a result of amendment in Federal Law FZ-273 "On anti-bribery measures" and amendments in Shell "Manual on Anti Bribery and Corruption Program". This document derogates the following: SPD-CMS-INS-00002 "Anti-Bribery and Corruption Program Instruction" SPD-CMS-REG-00001 "Conflict of Interest and Gift & Hospitality Regulation"
	Document transformation to SPD-CMS-REG-00009 "Regulation on Anti-Bribery and Corruption, Gifts and Hospitality in Salym Petroleum Development N.V."	The document has been transformed due to the introduction of SPD-CMS-MAN-00002 "Ethics and Compliance Management Manual (Ethics Code) "Salym Petroleum Development N.V." Based on the document content review it was confirmed its relevance and compliance with the key ABC regulatory requirements and relevant regulatory documents of Shareholders.

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1 Introduction

The Regulation on Anti-Bribery and Corruption, Gifts and Hospitality (hereinafter “The Regulation”) has been developed in compliance with valid legislation of the Russian Federation, taking into account requirements of generally recognized principles and norms of international law and international contracts, and also embodied the similar regulatory documents of Shareholders including “E&C Manual” developed by Shell. The Regulation governs the issues related to the implementation of ABC and Gifts and Hospitality clauses, formalizes the proper controls related to the business process titled as “Ethics and Compliance Management”. The list of the processes is stated in the document [SPD-CMS-MAN-00001 «Corporate Management System Manual»](#).

The Regulation defines the expected norms of behavior demonstrated by Company’s employees and related to prevention of any potential violations of ABC legal norms and clauses of regulatory documents effective in “Salym Petroleum Development N.V.” and also clarifies and making certain details for [SPD-CMS-MAN-00002 «Ethics and Compliance Management Manual \(Ethics Code\)»](#). The expectation is based on the Company’s General Business Principles namely “Business integrity”.

Application of the clauses of regulatory documents effective in shareholders’ companies without its adaptation is prohibited based on the document [SPD-IM-INS-00003 «Instruction of Salym Petroleum Development N.V. on Management of External Regulatory and Legal Acts»](#).

This document is an internal legal act of "Salym Petroleum Development N.V" including its subsidiary and all of its separate divisions (collectively, the "Company").

1.1 Purpose

Within limits of this Regulation the Company defines the following goals:

- To minimize the risk of involvement of the Company and employees of the Company regardless of occupied position into corruption activities;
- To develop among shareholders, Supervisory Board, The Chief Executive Officer (CEO), the Management team (MT), employees of the Company, contractors, subcontractors and other persons consistent understanding of the Company’s position of zero tolerance to corruption in any forms and manifestations;
- To generalize and explain key requirements of Russian and international anti-corruption legislation, which can be applied to the Company and its employees;
- To define rules for exchange of business gifts and hospitality signs;
- To establish the responsibility of the Company’s employees to know and comply with principles and requirements of this Regulation, the key norms of applicable anti-corruption legislation, and also adequate procedures to prevent corruption.

1.2 Scope

The Regulation is an integral part of the Company’s corporate governance and culture and applies to all Company’s activities. **The CEO** bears the responsibility over initiation and execution of all activities aimed to maintain the compliance with principles and requirements of this Regulation including the appointment of individuals which activities cover the identification and assessment of risks, development of proper controls, their further implementation and periodic self-assessment in line with [SPD-CMS-REG-00005 «Risk Management and Internal Control Regulations»](#).

In the process of conclusion of contracts with entities performing works for the Company, the Company must include an item on strict implementation of requirements and compliance with principles of applicable anti-corruption legislation in terms and conditions of contracted concluded with these entities.

At the minimum, anti-corruption laws:

PROHIBIT the Company and any individual or legal entity acting on its behalf to suggest, promise, perform payment or issue a permit for payment directly or indirectly in any form (for example, a bribe or interest in the deal) to any government official in order to influence or award any actions of such official; and

REQUIRE from the Company and its employees to keep accurate records of all operations in their invoices and registers which clearly reflect the nature of all payments, and also assure a relevant internal control framework in order to identify and prevent illegitimate payments (for example, bribes and fees in deals).

1.3 Target Audience

It is mandatory for all Company's Employees to comply with the Regulation, regardless of their position, work experience and work schedule, previously got awards and nominations, the nature of the contractual relationships and also mandatory for persons acting on behalf of for the benefit of the Company (for instance, under an effective contracts, a power of attorney granted, etc.).

The Regulation is recommended for use by representatives of Shareholders and other stakeholders which interact with Company's representatives.

Persons guilty in violation of requirements of this Regulation can be called to disciplinary, administrative, civil or criminal account initiated by the Company, law-enforcement bodies or other persons in compliance with procedures and on the basis specified in valid legislation of the Russian Federation, local regulatory Acts and labor contracts.

2 The key principles of counteraction to involvement into the corruption activities

2.1 Zero tolerance to corruption in any forms and demonstration

The Company adheres to the principle of zero tolerance to corruption in any forms and demonstrations during performance of its activities.

The principle of zero tolerance to corruption means strict prohibition for the Company MT, the Company employees and other persons acting on behalf of the Company or in its interests, directly or indirectly, personally or through intermediaries to participate in corruption activities regardless of business practice.

The Company stresses unacceptability of corruption activities, including existence of conflict of interests, both in relation to representatives of the governmental bodies, public associations, private companies, politicians and other third parties, and in relation to the Company employees by means of malpractice in order to receive any personal benefit.

In case of origination of doubts in legitimacy of their actions and their compliance with requirements of this Regulation, the employee should consult Line Manager, Compliance Ethics Advisor, Internal Auditor and/or The Head of Security, Business Integrity and ER.

2.2 Inevitability of sanctions

The Company declares its irreconcilable attitude to any forms and demonstrations of corruption activities at all levels of the corporate governance, investigates all reasonable justified messages on violations of appropriate procedures on counteraction to corruption activities and calls to account guilty persons not taking into account their positions, years of work, status in the Company and other relationship with it in compliance with applicable legislation and local regulatory documents of the Company.

The Company uses all possible reasonable and legitimate efforts for maximum prompt and irreversible prevention of offences.

The Company keeps its right to pass information on persons violating requirements of applicable legislation to authorized state power bodies.

2.3 Ligitimacy

The Company commits to strictly comply with legislation of the Russian Federation, and also international legislation in the area of counteraction to corruption activities.

In case of origination of discrepancies between norms of the Russian and international legislation in the area of counteraction to corruption activities, the issue on their application will be additionally discussed with representatives of the Company's Shareholders.

2.4 Anti-corruption controls

The Company develops and implements adequate controls for counteraction to and prevention of corruption activities and controls their compliance taking into account applicable provisions of the Russian and international legislation in the area of counteraction to corruption activities. The description of controls design and implementation is based on [SPD-CMS-REG-00005 «Risk Management and Internal Control Regulations»](#).

2.5 Contractors and applicants due-diligence

The Company performs control of contractors and applicants before making decision on start or continuation of business relationship in relation to their reliability, zero tolerance to corruption and absence of conflict of interests. Job candidates due-diligence is performed based on [SPD-HSSE-INS-00029 « Instruction on due-diligence of applicants »](#).

When building business relationship with contractors the Company performs control of tolerance to bribery, including control over availability of their own anti-corruption procedures or policies, their preparedness to include anti-corruption conditions into contracts, and also provide mutual assistance for ethical performance of business and prevention of corruption. The contractors due-diligence is performed based on [SPD-SCM-REG-00005 «Contracting and Procurement Regulation of the Company Salym Petroleum Development N.V.»](#).

2.6 Acknowledgment and learning

The Company publishes this Regulation in free access at corporate web-site and declares zero-tolerance to corruption, recommends to comply with principles and requirements of this Regulation to all contractors, their employees and other persons.

The Company assists to improvement of anti-corruption culture level by means of informing and training of employees in order to maintain their awareness of the Company anti-corruption activities and Ethics Code. Maintenance of the proper awareness level is performed via awareness sessions devoted to Ethics and Compliance. The sequence of the awareness sessions and other activities is defined with internal regulatory documents of the Company.

2.7 Monitoring

The Company performs monitoring of embedded anti-corruption controls functioning. If any changes in the external environment took place or availability of previously defined risks re-assessment and/or assurance activities outcomes (audits / reviews including the activities with involvement of Shareholders) the authorized Company's representatives develop supplemental controls and/or improve the existed ones. Self-assessments of the existed control framework are initiated based on the updates previously done. Risk management process is formalized in [SPD-](#)

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CMS-REG-00005 «Risk Management and Internal Control Regulations». Self-assessments of controls are conducted in line with SPD-CMS-INS-00005 «Internal Control Framework Instruction».

2.8 Notification on violations

Norms of behavior expected by the Company from employees as well as Company's obligations to its employees, Shareholders, business partners and the society are stated in SPD-CMS-MAN-00002 «Ethics and Compliance Management Manual (Ethics Code)». When you are making a decision, you should always be guided by the Code. The Company's employee has the right to contact the Company personally or anonymously and report concerns or positive examples of compliance with the Regulation. If the Company's employee or another person has any doubts of suspicious about violation of the effective law, Company's regulatory documents of ABC segment and other regulatory documents, they must report this using the verbal or written ways of communication stated below:

- Face-to-face communication with Compliance Ethics Advisor, Internal Auditor or The Head of Security, Business Integrity and ER;
- E-mail communication to the Line Manager or higher ranking manager with the copy to the Internal Auditor, Compliance Ethics Advisor, the Head of Security, Business Integrity and ER;
- E-mail to SPD-L-compliance@salypetroleum.ru;
- Sending a message (including the anonymous option) through the Company's CONFIDENCE LINE:

<https://salym.shell.com/feedback/line-of-trust/> - Company's internal web-site

<https://salypetroleum.ru/confidenceline> – Company's external web-site

[8-800-200-64-07](tel:8-800-200-64-07) – 24/7 telephone communication channel.

The Company guarantees confidentiality to all employees and other persons which have reported on violations in a bona fide manner, except in cases when such information is required by the authorized governmental bodies. Based on the outcomes of inspections and investigations held the Company may issue the information on lessons learned but has no obligation to inform the applicant on taken measures if this information has no value for Company's activity (or the proper adjustments of activity).

If the Company's employee or another person provides deliberately fake information or tries to pursue personal gain running counter to the Company's best interests such a person may be prosecuted according to the effective legislation of the Russian Federation and Company's local regulatory documents.

3 The description of the key principles and proper controls applied for counteraction to involvement in corruption activity

3.1 Gifts and Hospitality and other types of benefit

The Company recognizes exchange of business gifts and implementation of representative expenditures, including business hospitality, as a required part of business performance and commonly accepted business practice. The Company encourages atmosphere of honesty and transparency in relation to business gifts and expenditures for business hospitality.

At the same time the Company believes that this area is sensitive in terms of risk of involvement into corruption activities, therefore all such operations performed on behalf of the Company or in its interests must comply with the following criteria:

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- Fully comply with norms of applicable legislation of the Russian Federation and local regulatory documents of the Company;
- Not to have direct or indirect goal to affect decisions of representatives of the Governmental bodies, public associations, private companies, politicians or other persons which affect maintenance or extension of the Company activities;
- Not to apply origination of any obligations to the grantor or organizer of activities associated with business hospitality;
- Not to create a reputational risk to the Company, employees and other persons in case of disclosure of information on gifts and/or representative expenditures;
- Not to be cash or non-cash resources, equities, precious metals and not to represent other types or equivalents of money and/or luxuries.

Expenditures for gifts to Government Officials must be endorsed with Head of relevant department of the Company. **One-time gift to a government official must not exceed 3,000 Rubles by cost** in compliance with the RF legislation. If combined costs associated with government official exceed equivalent of **15,000 Rubles** during one calendar year the memorandum with data on name, job position, job place and the total costs of the gifts offered should be issued. This memorandum must contain data stated in the *Attachment 4* to this Regulation. Such memo must be developed well in advance by the authorized employee and approved by the Company's Head of Legal and agreed by CEO before they are presented to the recipients. Gifts to governmental officials **must be** registered in the proper register for the purpose of control over total cost of gifts during a year. The hard copies of memo should be kept by the Company's Compliance Ethics Advisor.

No expenditures for gifts to any governmental official can be performed in order to affect any actions or obtaining an illegitimate advantage.

IT IS PROHIBITED to perform any expenditures for family members or guests accompanying a governmental official.

The Company strictly **prohibits** its employees to require gifts and hospitality signs.

As a general principle the Company **does not advise** its employees to accept gifts and hospitality signs from business partners.

Nevertheless, it is recognized that there are cases when refusal to accept a gift or hospitality sign from a business partner, or refusal to suggest them can be reviewed as impoliteness. In such cases the key principle is the fact that acceptance of gifts and hospitality signs must never affect business decisions of the Company or the employee. Before you accepting or offering a gift or hospitality signs, employees must ask themselves the following questions:

- Can acceptance or offering of a gift or hospitality sign result in origination of obligation or imply such obligation?
- Are these gifts or hospitality signs comprise an "award" for business deal?
- Are these gifts or hospitality signs extremely expensive?

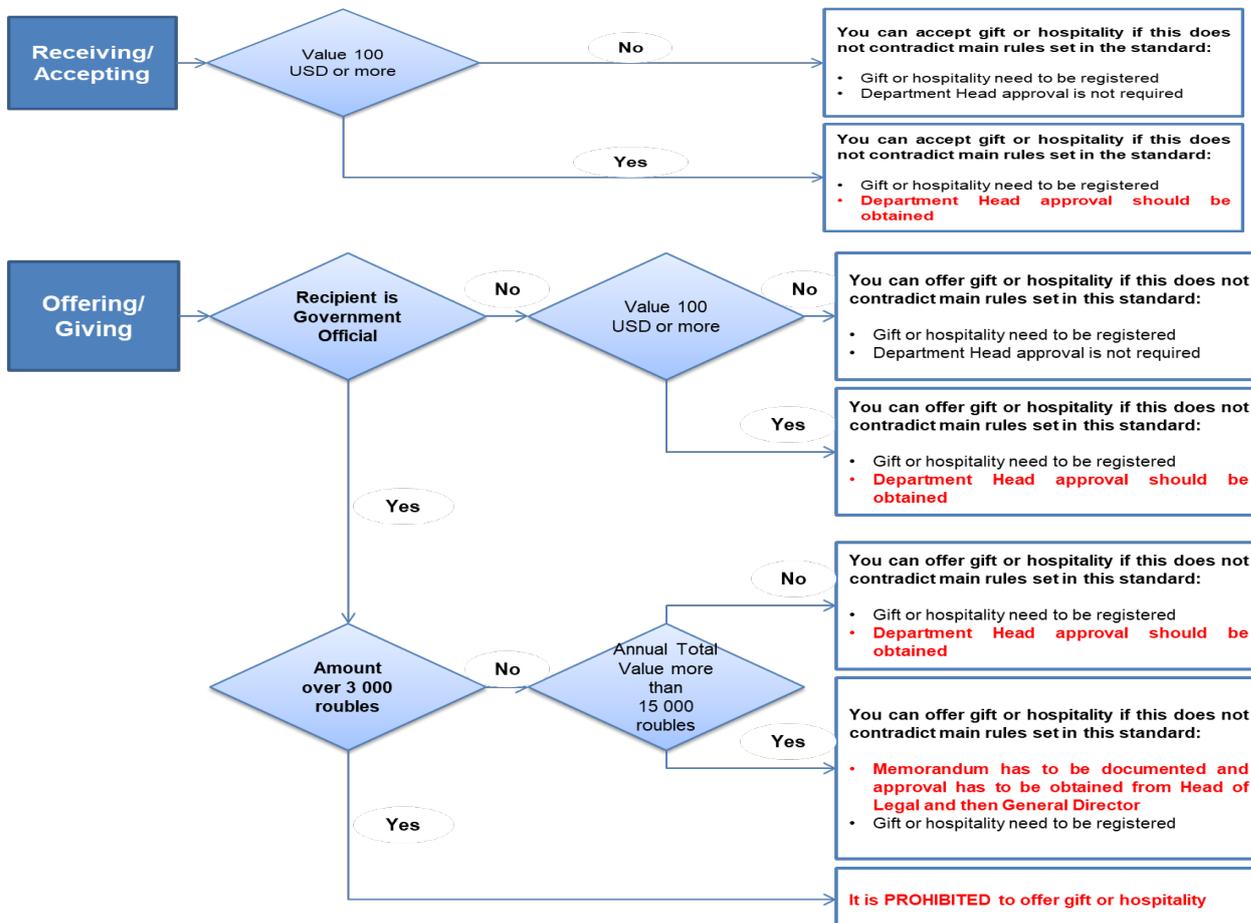
If answer to any of these questions is "yes", then gifts and hospitality signs must not be offered or accepted. If you are not sure how to answer any of these questions, consult Compliance Ethics Advisor.

NEVER ACCEPT AND DO NOT OFFER (general rule):

- Illegitimate or unnecessary gifts and hospitality signs;
- Money or its equivalents;
- Personal services;
- Loans;

- Events or entertainments in the absence of business partner;
- Gifts and hospitality signs in periods of making important business decisions.

Detailed manual on declaration of gifts and hospitality is stated in the scheme below.



In case of preparation of gifts associated with key annual holidays (New Year, Oil Industry Day) by Company’s authorized employees and these gifts would be given on behalf of the Company, it is required to comply with regulations on cost of gifts specified in this Regulation.

If it is required to define the price of the gift received by the employee, the authorized representatives of the Company can perform the review of the existed data on the obtained item in order to identify its market price or the analogue can be found and its price in comparable conditions would be defined. The definition of the price for other items of hospitality can be performed via review of data on prices set for analogues. In line with CEO’s decision the Company’s employees from different departments and independent experts can be involved in the review. The outcomes of the review should be presented at the meeting of Company’s Business Ethics Committee within the deadlines agreed by the CEO. The activities of the Committee are governed with [SPD-CMS-REG-00010 «Regulation on Business ethics and Business integrity Committee of Salym Petroleum Development N.V.»](#).

All gifts and hospitality items offered or received must be properly registered. Employees of the Company within three working days from the time of offering / acceptance of any gift / hospitality sign **must** perform their registration regardless of its cost by means of internet form for registration of acceptance / offering of gifts and hospitality signs posted at internal web-site of the Company (section titled as “Feedback”). **Information on estimated cost of a gift / hospitality sign is mandatory of entry into the above-mentioned forms.**

If an employee of the Company at the time of offering / acceptance of any gift / hospitality sign did not have access to internal web-site of the Company (for example, when being on a business trip

or on vacation, etc.), registration of gift / hospitality sign must be performed within three business days from the time of return to permanent job place.

Other forms of registration of offered or accepted gifts or hospitality signs, excluding those specified above, do not comprise confirmation of the employee actions in relation to compliance with provisions of the Regulation. The only exclusion is made for souvenirs with the grantor logo (daybooks, calendars, caps, pens, T-shirts and other) and postcards in case of annual official holidays (New Year, Christmas, Oil Industry Day, Women's Day, Fatherland Defender Day, etc.), intended for wide range of recipients, including personnel of the grantor and other third parties. Gifts and hospitality which were not accepted by the employee must be also stated in the gifts and hospitality received register. Consulting support on the ways to return the offered gift which was not accepted by the employee can be provided by the Corporate Affairs Department representatives.

In case of any doubts about compliance of business gift or hospitality with requirements of this Regulation, the Company's employee should consult on this issue with the Head of relevant department, Compliance Ethics Advisor, The Head of Security, Business Integrity and ER or Internal Auditor.

Periodically Compliance Ethics Advisor or Internal Auditor can initiate the reviews aimed to verification of the completeness and correctness of data on gifts and hospitality stated in registers and compliance health check of the gifts and hospitality approval process against the requirements of the Regulation and other regulatory documents of the Company. The review outcomes are communicated to CEO and included into the presentation pack for BAC meeting.

3.2 Conflict of interest cases: prevention, monitoring and reporting

Conflict of interests in this Regulation means the situation in which personal interest (direct or indirect) of the Company's employee affects or may affect appropriate implementation of job duties by him/her, and which results or may result in contradiction between personal interest of the Company's employee and rights and legitimate interests of citizens, organizations, society or the state capable to result in damage to rights and legitimate interests of citizens, organizations, society or the state.

Personal interest of the Company's employee, which affects or may affect appropriate implementation of job duties by him/her, means an opportunity that in the process of implementation of job duties, he/she receives income in the form of money, values, other property or services of material nature, other property rights for him/her or third parties.

Any conflict of interest creates the impression of improper conduct, which may erode trust to the Company. That is why any potential conflicts of interest need to be identified and settled efficiently.

Potential conflicts of interest may arise due to:

- Activities associated with employment / management / consulting in organizations beyond the Company boundaries;
- Financial or other participation in companies of contractor, supplier, competitor or partner;
- Family or personal interest or relationship;
- Use of received knowledge, information, experience or occupied position beyond the Company boundaries;
- Other actual or potential conflict of interests.

Activities associated with employment / management / consulting in organizations beyond the Company boundaries mean cases when an employee works or agrees to work / manage / consult in any other company, which performs activities similar to the Company or having business relationship with the Company. Employment in the Company means full occupation during working time. Beyond working time employees can be occupied in other companies or with other activities, but under condition of provision of information confirming that there is no conflict of interests.

This category also includes participation in any ownership (land, buildings, plants, machines, equipment, vessels, vehicles, exploration for minerals, enterprises, companies, etc.), rented, hired or leased to the Company directly by the employee or through third party or organization in which the employee has an interest.

Possession of existing capital in companies being contractors, suppliers or competitors in similar business areas can cause actual conflict of interests, if it affects business decisions of the employee.

Potential conflict of interests may arise if the employee or the employee spouse, child or close relative of the family (parents, brothers or sisters) work or have external financial interest, for example, as an employee, director or consultant in any company being a contractor, supplier or competitor of the Company, or intending to become them.

Employees must not allow situations in which their personal relationship affects decision-making in the Company and must report about all known to them cases of existing and potential conflict of interests to the Line Manager, the Head of Department, Compliance Ethics Advisor and Internal Auditor.

Use of received knowledge, information, experience or occupied position beyond the Company boundaries is always related to intellectual property which includes rights to patents, trademarks and service marks, domain names, copyrights (including rights to software), rights to industrial samples, rights to use databases, technologies or other confidential information (sometimes called commercial secret or operational information). Employees must not use knowledge or position in the Company for gaining financial benefit beyond it.

The Regulation does not contain the full list of situations or relations which may create conflict of interests or its semblance, therefore each situation should be assessed by actual data.

The key activities on monitoring and prevention of conflict of interests:

- Due-diligence of the job applicants on the existence of conflict of interests in line with requirements set in [SPD-HSSE-INS-00029 « Instruction on due-diligence of applicants »](#);
- Annual conflict of interests declaration campaign – must be compiled by all employees without any exclusions;
- Contractors due-diligence on the existence / absence of conflict of interests with Company's employees in line with requirements set in [SPD-SCM-REG-00005 «Contracting and Procurement Regulation of the Company Salym Petroleum Development N.V.»](#);
- Review of data on potential conflict of interests gathered via CONFIDENCE LINE, development of the report on existence / absence of the conflict of interests.

The outcomes of the annual conflict of interests declaration campaign and other related activities are stated in the slide pack for each BAC meeting.

3.3 Donations and charity

The Company does not provide charity, sponsor and financial assistance with direct or indirect purpose to affect decisions of representatives of the governmental bodies, public associations or other entities which affect maintenance or extension of the Company activities, or if such assistance can be objectively perceived as an attempt to provide such affect. All activities are performed in line with General Business Principles stated in [SPD-CMS-MAN-00002 «Ethics and Compliance Management Manual \(Ethics Code\)»](#) and [SPD-CA-REG-00002 «Social Investment Regulation»](#).

Information of the Company expenditures for provision of charity and sponsor assistance is open for review.

The Company undertakes responsibility and participated in the maintenance of well-being of communities with which it interacts. As part of its obligations the Company may make its contribution into local charity organizations or participate in local social investment programs. But it is not

acceptable to make donations in order to obtain prohibited advantages or influence on any government employee and/or official.

In this Regulation “**donation**” means:

- Any value (in monetary or other form) handed over to charity organization;
- Any sponsor assistance for public event, when part of income will be handed over to charity organization;
- Any development of community or similar program and expenditures for it.

The key activities aimed to prevention from the involvement into corruption activity while donations and execution of charity initiatives:

- Before making any donation the Company must make reasonable efforts in order to determine if any government official is affiliated with planned recipients.
- Any **warnings** made during preliminary qualification must be resolved before payment of funds. Contract Holder must consult with Compliance Ethics Advisor or the Head of Legal in case of origination of any doubts.
- Pre-qualification is performed by Corporate Affairs Department jointly with department which plans to present a gift. When required, representatives of Security, Business Integrity and Emergency Response can be involved in implementation of pre-qualification.
- Warning means any evidence that a person or the Company may perform corruption payments, or that a person or the Company are inclined or plan to violate anti-corruption legislation. See examples of possible warnings in Attachment 1 to this Regulation.
- All voluntary donations of the Company comply with Agreement on cooperation between the Company and KHMAO-Yugra Government.
- In relation to donations the Company uses bilateral and trilateral agreements (the Company – Receiving party – Contractor / Supplier). In this case all agreements/contracts of donations must contain anti-corruption conditions in edition presented in *Attachment 2* to this Regulation.
- Corporate Affairs Manager (or authorized representative of the department) must twice a year present a memorandum with description of suggested donations and amounts. The memorandum must be endorsed by the Company CEO after consultations with the Head of Legal and Compliance Ethics Advisor. The above-mentioned documents (memorandums and additional documents) must be kept in Corporate Affairs Department.

Periodically the review of the stated activities effectiveness can be conducted in line with audits and reviews based on which the decision on their strengthening and/or update would be taken.

3.4 Participation in political activities

In line with General Business Principles stated in [SPD-CMS-MAN-00002 «Ethics and Compliance Management Manual \(Ethics Code\)»](#) the Company does not participate in political activities with direct or indirect purpose to influence decisions of representatives of the government, public associations, politicians or other persons which affect maintenance or extension of the Company activities, if such participation can be objectively perceived as an attempt of such influence.

For other purposes of the Company participation in political activities, information on expenditures for participation in political activities is open.

3.5 Interaction with representatives of the governmental bodies and public associations

The Company refrains from payment for any expenditures of representatives of the government or public associations, as well as their close friends and/or relatives, or in their interests, including reception of financial or other benefit by them at the Company account, with direct or indirect purpose to obtain any commercial and/or competitive advantages.

Facilitation Payment - a minor payment to induce a (usually low-ranking) Government Official to expedite or secure performance of a routine duty which that person is already obliged to perform and where such payment would exceed what is properly due.

A Facilitation Payment is not permitted by the Company and is illegal under the UK Bribery Act (2010).

Items stated below cannot be recognized as facilitation payments:

- A payment made in the good faith belief that life, health or safety may be in imminent danger (in such cases the proper report must be developed and the payment must be stated in the accounting system);
- Payments that are required by applicable law;
- The urgent processing of a regular government-provided service, against rates published by the government, for which the payment is made into a government administered account and for which an official receipt is given.

Government intermediary – an individual or legal entity presenting interests of the Company to government official or in government institution.

Intermediaries in relationship with government authorities are:

- Commercial agents: consultants, trade agents, distributors or other persons involved for assistance to obtain government contracts or concessions.
- Agents dealing with arrangement of documents for movement of goods: couriers, forwarding companies, customs controllers, visa services or persons rendering similar services.

It is unacceptable to make payments to government intermediaries if the Company knows, believes or assumes that the government intermediary will perform corruption payment to a government official in the Company interests. The Company must not take position that it did not know about intentions of government intermediary, if there were any warnings (*Attachment 1*), or if the Company did not perform comprehensive verification in relation to the government intermediary.

The key control activities aimed to prevention from the involvement into corruption activity while interaction with representatives of the governmental bodies and public associations:

- It is required to complete certificate on disclosure of affiliated relations with government officials (*Attachment 3*) during implementation of preliminary qualification (for each participation).
- Security, Business Integrity and Emergency Response Service must perform comprehensive verification in line with [SPD-HSSE-REG-00041 «Regulation on Security, Business Integrity and ER Service»](#).
- Written memorandum confirming involvement of government intermediary must be developed by Contract Holder (*Attachment 5*).

Memorandum must:

- contain summed up results of comprehensive verification;
- provide qualification of government intermediaries;
- contain justification of paid awards;
- define any warnings and describe their solution;

- Memorandum must be reviewed by Legal representatives.

The above-listed documents (certificates, reports on comprehensive verification, memorandums, additional documents) must be kept in Supply Chain Management team.

If in the process of work it becomes known or there is an assumption that government intermediary for representation of the Company interests in relations with government bodies committed or is going to commit bribery in relation to government official, all payments to the government intermediary must be immediately stopped, and the case must be handed over for review to Security, Business Integrity and Emergency Response Service with notification of Compliance Ethics Advisor and Internal Auditor which define the necessity to inform Business Ethics Committee taking into account [SPD-CMS-REG-00010 «Regulation on Business ethics and Business integrity Committee of Salyam Petroleum Development N.V.»](#).

3.6 Contracts initiation

In accordance with [SPD-SCM-REG-00005 «Contracting and Procurement Regulation of the Company Salyam Petroleum Development N.V.»](#) prior to conclusion of contract with contractor (third party), in the case when contract value exceeds 50,000 USD (or in Ruble equivalent at internal exchange rate of the Company), it is required to obtain conclusion of representative of Security, Business Integrity and Emergency Response Service on contractor appraisal with comments on potential problems or concerns requiring resolution.

The key control activities aimed to prevention from the involvement into corruption activity while initiation the contracts:

- Prior to conclusion of contract, the Company must make reasonable efforts in order to determine if legal entity (contractor, performer or supplier) is affiliated with government employee and/or official or not.
- Any contract with the legal entity (contractor, performer or supplier) must contain anti-corruption conditions in edition provided in *Attachment 2*. If valid contracts do not contain requirements specified in this Item, it is required to sign an additional agreement to the contract with legal entities to include anti-corruption conditions.
- Any **warnings** (*Attachment 1*) made during preliminary qualification must be resolved before contract conclusion. Contract Holder / Contract Engineer must consult with Legal representatives in case of any doubts.

All contracts initiated by the Company must contain the following conditions:

- Inform legal entities on General Business Principles of the Company;
- Sections requiring implementation of General Business Principles, and also the right to audit and contract termination in case of their violation;
- Legal entity's obligation in the process of contract implementation to comply with valid anti-corruption legislation of the Russian Federation.
- In case of any unregulated warning or disagreement of the legal entity with contract clauses, Contract Engineer must notify Legal representatives and receive an official advice on further actions.

3.6.1 Interaction with legal entities, payments through intermediaries and to third parties

The Company refrains from involvement of intermediaries, agents, partners, other persons acting on behalf of the Company or in its interests to perform any actions violating principles and requirements of this Regulation or creating reputational risk to the Company, employees and other persons in case of disclosure of information on such actions.

Prior to making a decision on start or continuation of cooperation with an intermediary, business partner, agent or other legal entities, or participation in joint venture, the Company:

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- Gathers, analyses and performs verification of information on potential counteragents and partners in joint ventures, their reputation, zero tolerance to corruption and absence of conflict of interests;
- Informs them on principles and requirements of this Regulation and other regulatory documents of the Company including [SPD-CMS-MAN-00002 «Ethics and Compliance Management Manual \(Ethics Code\)»](#).

The Company reserves its right to termination of contracts with counteragents and partners in joint ventures in case of identification of facts of corruption actions on their side.

The Company in any way encourages legal entities to adopt internal regulatory documents on counteraction to corruption activities similar to this Regulation.

3.7 Reporting requirements

The Company strictly complies with requirements of applicable legislation and rules for keeping reporting documentation. Implementation of operations without their reflection in book-keeping, distortion or falsification of data of book-keeping, management and other types of accounting or confirming documents is considered to be corporate fraud and will be investigated in compliance with procedures established in local regulatory document of the Company.

Employees must immediately inform Compliance Ethics Advisor, The Head of Security, Business Integrity and ER, Internal Auditor on any request for illegitimate payment or any evidence that an individual or the Company may perform corruption payment or that an individual or the Company is inclined or plans to violate anti-corruption laws. The information can be also communicated via CONFIDENCE LINE.

Employees have the same obligations in the part of immediate provision to inform Compliance Ethics Advisor, The Head of Security, Business Integrity and ER, Internal Auditor on any information on any hidden fund or asset, any false or falsified entry into accounting records of the Company, or any payments which bypass internal financial control of the Company. The information can be also communicated via CONFIDENCE LINE.

Attachment 1 Examples of red flags indicating the involvement into the corruption activity (warnings)

During cooperation of Company's representatives with contractors and intermediaries the following situations with signs of involvement into the corruption activity can occur:

1. Requests for payment in cash.
2. There are requests for payment to third parties or payment to another country.
3. Suggestions or evidences of payment for acceleration the process of approval the execution of liabilities by the Company and/or its compliance with defined requirements.
4. Several contractors were appointed for the same scope of work, the criteria for distribution of the scope are not defined or not transparent.
5. There are requests for abnormally high or excessive bonuses, facilitation payments or other payments to intermediaries.
6. Gathered information identifies that the Company's employee / Company / contractor / intermediary pays fees for political purposes.
7. There are requests for reimbursement of costs which are insufficiently documented or are not transparent.
8. The contractor / intermediary is not acknowledged with anti-corruption regulatory requirements and can not demonstrate the readiness to agree with Company's General Business Principles.
9. The contractor does not have any assets and qualified personnel or uses legal entities with small number of assets or with no assets at all.
10. The contractor does not have proper experience or "service record" by the type of activities in the industry.
11. The authorized contractor's representatives refuse to sign the contract.
12. The contractor / intermediary was recommended by a government official.
13. There is a reason to believe that violation of local laws or Regulation requirements is available or expected in the contractor's / intermediary's offers.
14. Actually performed payments by the Company do not correspond to contract conditions.
15. Failure to implement relevant delegated obligations of authorized bodies or other notices and endorsement procedures.
16. There is an evidence of double payment (for example, reimbursement of expenses incurred during the business trip and payment of "per diems").
17. It was obtained the requests for expenditures for business trips of family members of a government official or for additional trips which are not directly associated with operations of the Company.

Attachment 2 Sample anti-corruption clauses for inclusion into the contract with contractors and donation contracts

The clauses specified below must be included in all contracts with contractors, suppliers or consultants who are not governmental intermediaries, and also donation contracts. Format of clauses may change to reflect content of business operation or agreement, but the essence of the clauses must not change.

Sample Contract Clauses	Пример статей договора
<p>By this the Contractor confirms he received of a copy of SPD General Business Principles (or familiarized with them at web-site https://salympetroleum.com/about/principles.</p> <p>The Contractor fully agrees that compliance with SPD General Business Principles during cooperation with the Company is a mandatory condition or the Company, and also guarantees their implementation on his side.</p>	<p>Настоящим Подрядчик подтверждает, что получил копию «Общих принципов деятельности «СПД» (или ознакомился с ними на веб-сайте https://salympetroleum.ru/about/principles/.</p> <p>Подрядчик полностью согласен с тем, что соблюдение «Общих принципов деятельности «СПД»» при сотрудничестве с Компанией является обязательным условием для Компании, а также гарантирует их исполнение со своей стороны.</p>
<p>The Contractor confirms that from the beginning of rendering of services under the Contract he adheres to and will continue to adhere to SPD General Business Principles in the process of cooperation with the Company. If the Contractor provides personnel that will render services (perform works) on behalf of the Company or represent the Company, the Contractor also guarantees that such personnel act and will act in compliance with SPD General Business Principles.</p>	<p>Подрядчик подтверждает, что с начала предоставления услуг по Договору, придерживается и будет продолжать придерживаться «Общих принципов деятельности «СПД» в ходе сотрудничества с Компанией. В случае если Подрядчик предоставит персонал, который будет оказывать услуги (выполнять работы) от имени Компании или представлять Компанию, Подрядчик также гарантирует, что такой персонал действует и будет действовать в соответствии с «Общими принципами деятельности «СПД».</p>
<p>During the Contract execution the Contractor confirms the acknowledgement with clauses of the Company Regulation on anti-bribery and corruption, gifts and entertainment, and also must comply with effective anti-corruption legislation of the Russian Federation and immediately notify each other in written form on any cases of violation of anti-corruption legislation.</p>	<p>Подрядчик при выполнении Договора подтверждает факт ознакомления с Положением компании «Салым Петролеум Девелопмент Н.В.» по программе противодействия взяточничеству и коррупции, по вопросам подарков и знаков гостеприимства, а также обязуется соблюдать действующее антикоррупционное законодательство Российской Федерации и незамедлительно уведомлять друг друга в письменной форме о любых случаях нарушения антикоррупционного законодательства.</p>
<p>The Contractor/Grantee confirms that among his founders, employees or affiliated legal entities there are no Government Officials.</p> <p>Government Official means the citizen which performs the professional activity on a position of a governmental official and get a monetary allowance (remuneration, fees) at the expense</p>	<p>Подрядчик/Одаряемый подтверждает, что среди его учредителей, работников или аффилированных юридических лиц нет Государственных должностных лиц.</p> <p>Под Государственным служащим понимается: гражданин, осуществляющий профессиональную служебную деятельность на должности государственной службы и</p>

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of the Russian Federation budget, the budget of the Russian Federation, the budget of the Russian Federation subject.	получающий денежное содержание (вознаграждение, довольствие) за счет средств федерального бюджета, субъекта Российской Федерации.
The Parties shall adhere to policy of full intolerance to bribery and corruption implying full prohibition of corruption actions of the Parties and implementation of payments the purpose of which is to simplify formalities in relation to the Company activities, assure quicker solution of some issues.	Стороны проводят политику полной нетерпимости к взяточничеству и коррупции, предполагающий полный запрет коррупционных действий Сторон и совершения выплат, целью которых является упрощение формальностей в связи с хозяйственной деятельностью Компании, обеспечение более быстрого решения тех или иных вопросов.
During implementation of their obligations under this Contract the Parties, their affiliated entities, employees or intermediaries shall not pay, shall not offer to pay and shall not permit to pay any funds or values, directly or indirectly to any persons in order to affect actions or decisions of such persons to receive some illegitimate advantages or achieve other illegitimate goals.	При исполнении своих обязательств по настоящему Договору, Стороны, их аффилированные лица, работники или посредники не выплачивают, не предлагают выплатить и не разрешают выплату каких-либо денежных средств или ценностей, прямо или косвенно, любым лицам, для оказания влияния на действия или решения этих лиц с целью получить какие-либо неправомерные преимущества или иные неправомерные цели.
In case of violation of the Contract conditions, and also anti-corruption legislation, the Parties bear liability in compliance with legislation of the Russian Federation.	В случае нарушения условий Договора, а также законодательства о противодействии коррупции, Стороны несут ответственность в соответствии с законодательством Российской Федерации.

Attachment 3 Certificate for government intermediaries

CERTIFICATE

Salym Petroleum Development N.V. (hereinafter the "Company") is subject to numerous legal provisions relating to payments, directly or indirectly, to Government Officials or employees of national, regional or local community governing authorities. In this regard, we kindly request that you provide either the following confirmation or the requested information below.

[Intermediary] acknowledges that:

a) It has been informed that Company insists on honesty, integrity and fairness in all aspects of their business and expects the same in its relationships with all those with whom it does business. The direct or indirect offer, payment, soliciting and acceptance of bribes in any form are unacceptable practices. It has received a copy of the General Business Principles (or alternatively has taken notice of them on the public web site

<https://salympetroleum.com/about/principles/>.

b) From the commencement of its services under the Contract, [Intermediary] has adhered, and continues to adhere to the principles contained in General Business Principles in all its dealings with, for or on behalf of Company.

c) [Intermediary] has procedures and controls in place among its employees and its subsidiaries to assure compliance with Anti-Bribery Laws, including due diligence procedures for payments to third party contractors. [Intermediary] has previously given to Company, or has attached hereto, a copy of its code of conduct or manual of procedures for compliance with Anti-Bribery Laws.

d) In connection with the Contract, [Intermediary] is not aware of any behavior by

Company or its employees which is, or may be, inconsistent with the General Business Principles or Anti-Bribery Laws

[Intermediary] or its employees which is, or may be, inconsistent with the General Business Principles or Anti-Bribery Laws.

ЗАЯВЛЕНИЕ

Компания «Салым Петролеум Девелопмент Н.В.» (далее «Компания») руководствуется целым рядом правовых норм в отношении прямых или косвенных платежей государственным должностным лицам или работникам органов управления национального, регионального или местного уровня. В связи с этим мы просим вас предоставить либо следующее подтверждение, либо предоставить информацию, указанную ниже.

[Посредник] подтверждает, что:

а) он уведомлен о том, что Компания настаивает на честном и справедливом ведении дел, и ожидают того же от своих деловых партнеров. Прямое или косвенное предложение, вымогательство, уплата или получение взяток в любой форме является неприемлемым. Подрядчик получил копию Общих принципов деятельности (или ознакомился с ними на веб-сайте

<https://salympetroleum.ru/about/principles/>.

б) С начала предоставления услуг по Договору, [Посредник] придерживается и будет продолжать придерживаться Общих принципов деятельности в процессе сотрудничества или в случаях, когда Посредник действует в интересах или от имени Компании.

в) [Посредник] разработал и использует процедуры и механизмы контроля, позволяющие обеспечить соблюдение Антикоррупционных законов, его работниками и аффилированными лицами, включая тщательную проверку платежей, совершаемых в пользу третьих лиц. [Посредник] ранее предоставил Компании (или прилагает к настоящему Заявлению) копию кодекса деловой этики Посредника или руководства Посредника по соблюдению антикоррупционных законов.

г) В отношении настоящего Договора, [Посредник] подтверждает, что ему не известно о действиях:

Компании или его работников, не соответствующих Общим принципам деятельности или антикоррупционным законам

[Посредника] или работников Посредника, не соответствующих Общим принципам

[Intermediary] will promptly inform Company upon becoming aware of any such information.

e) [Intermediary] confirms that, from the commencement of its services under the Contract, in connection with its services under the Contract, [Intermediary] has complied with all applicable Anti-Bribery-Laws and has not made any payments corruptly to any Government Official for the purpose of: (i) influencing an act or decision of such Government Official in an official capacity; (ii) inducing the Government Official to use his or her influence with any agency or instrumentality of government; or (iii) assisting Company in securing or retaining any business from any agency or instrumentality of government.

f) [Intermediary] confirms that none of its directors, employees or associates is a Government Official or other person who could assert illegal influence on behalf of Company.

Date:

on behalf of [Intermediary] (signature)

деятельности или антикоррупционным законам.

В случае если подобная информация станет известна [Посреднику], [Посредник] обязуется незамедлительно уведомить об этом Компанию.

д) [Посредник] подтверждает, что с начала предоставления услуг по Договору и в связи с их оказанием [Посредник] придерживался всех применимых антикоррупционных законов и не совершил каких-либо ненадлежащих платежей в пользу Государственных должностных лиц с целью: (1) оказать влияние на действия или решения Государственного должностного лица в процессе исполнения им служебных обязанностей; (2) склонить Государственное должностное лицо к использованию его служебного или иного положения в любом государственном органе или организации; или (3) оказать содействие Компании в сохранении или обеспечении каких-либо сделок, договоров или коммерческих проектов, получение или осуществление которых зависит от какого-либо государственного органа.

е) [Посредник] заявляет и гарантирует, что ни один из его директоров, руководителей, работников или партнеров не является Государственным должностным лицом или иным лицом, способным оказывать незаконное влияние от имени Компании.

Дата:

Представитель [Посредника] (подпись)

Attachment 4 Example of memorandum on gifts and hospitality signs for government officials exceeding 15,000 Rubles

Name of employee sponsoring the proposed expenditure: _____

Job Title: _____

Amount of Request: RUB _____

Name of Governmental Department/Agency/Ministry/Other Instrumentality: _____

Name(s) of Government Official(s) and Titles(s): _____

Name of person who will provide the gift, hospitality or travel (= name reporter in online Col and G&H register): _____

Detailed description of proposed expenditure and event (including purpose of request, dates and duration of event and itemized proposed budget): _____

Description of Government Official's role and details of previous and anticipated interactions with SPD: _____

Are there any pending issues or decisions that the Government Official or their entity/agency may be expected to be involved with that could affect SPD – Yes/No? _____

If "Yes" please describe: _____

Is this expenditure a contractual requirement – Yes/No? _____

Is this expenditure required by written local law or regulation – Yes/No? _____

If "Yes" please provide contract or local law or regulation reference and submit this form to SPD Legal for confirmation of this together with any supporting information and documentation such as a copy of the relevant contract. _____ If not contractually required or required by local regulation, please identify the business reason for the expenditure: _____

Could an impartial observer perceive that SPD could secure any improper business advantage by this expenditure (in other words, whether the expenditure could be viewed as having been solicited or proposed in order to influence and/or secure an improper business advantage)– Yes/No? _____

If "Yes" please detail all relevant facts: _____

Approved (Head of Legal Department) _____

Prepared by (Name, Title) _____

Date _____

Attachment 5 Example of memorandum on involvement of government intermediary

Last name of the employee paying for involvement of a governmental intermediary:

Position: _____

Title / last name and address of the governmental intermediary: _____

Describe the proposed involvement (including the scope of services, duration of the involvement, and previous relations with the governmental intermediary, and any other supporting information to justify the involvement):

Describe the skills of the governmental intermediary in terms of service provision:

Describe the emolument, commission, and expense reimbursement offered, as well as why these are considered justified (for instance, comparison with market rates or result of any check-up analysis or bid):

State whether the participation is related to:

- high risk situations due to the fact that the counterpart is a resident of, or will provide services or is operating in, a high risk country;
- medium risk situations due to the fact that the counterpart is a resident of, or will provide services or is operating in, a medium risk country;
- low risk situations due to the fact that the counterpart is a resident of, or will provide services or is operating in, a low risk country.

State the risk:

High / Medium / Low

Provide the information:

In order to sum up the analysis, confirm whether any warnings were identified:

Yes / No _____

If Yes, describe how they were resolved:

Confirm that the contract registering the involvement of the governmental intermediary will contain the articles stated in Appendix 3 for appointment of an intermediary for work with a governmental entity:

Yes / No _____

Approved by (Legal Head) _____

Prepared by (last name, position) _____

Date _____

Attachment 6 Corporate glossary elements used in the document

Attachment 6.1 Normative references

The following external regulatory legal acts are referenced to in the document:

The UN Anti-Corruption Convention	United Nations Anti-Corruption Convention (adopted in New York on 31.10.2003, ratified by the RF Federal Law on 08.03.2006 No 40-FZ)
The Convention on criminal liability for corruption	Convention on criminal liability for corruption (concluded in Strasburg on 27.01.1999, ratified by the RF Federal Law on 25.07.2006 No 125-FZ)
The Convention on counteraction to bribery of officials of foreign countries	Convention on counteraction to bribery of officials of foreign countries during implementation of international business operations (concluded in Istanbul on 21.11.1997, ratified by the RF Federal Law on 01.02.2012 No3-FZ)
The UK Bribery Act	The UK Bribery Act 2010, approved by Great Britain Parliament and Queen Elizabeth II on 08.04.2010, came into effect on 01.07.2011
The USA Foreign Corrupt Practices Act	The USA Foreign Corrupt Practices Act, adopted by USA Senate on 05.05.1977, came into effect on 19.12.1977 (with amendments of 1998 for bringing to compliance with OECD Convention "On counteraction to bribery of foreign officials when making international commercial deals")
The Netherlands Criminal Code	The Netherlands Criminal Code, dated 03.03.1881 in edition of 04.12.1995
The Russian Federation Criminal Code	The Russian Federation Criminal Code, dated 13.06.1996 No 63-FZ
The Russian Federation Civil Code	The Russian Federation Civil Code, dated 30.11.1994 No 51-FZ
The Russian Federation Administrative Code	The Russian Federation Administrative Code, dated 30.12.2001 No 195-FZ
The Federal Law "On counteraction to corruption"	Federal Law "On counteraction to corruption", dated 25.12.2008 No 273-FZ
The Federal Law "On state civil service of the Russian Federation"	Federal Law "On state civil service of the Russian Federation, dated 27.07.2004 No 79-FZ
Anti-corruption guidelines	The guidelines on development and adoption of anti-corruption measures by organizations. Approved by the Russian Federation Ministry of Labor on 08.11.2013

The following internal regulatory legal acts are referenced to in the document:

SPD-CMS-MAN-00001	Corporate Management System Manual
SPD-CMS-MAN-00002	Ethics and compliance management Manual (Ethics Code) "Salym Petroleum Development N.V."
SPD-CA-REG-00002	Social Investment Regulation
SPD-CMS-REG-00005	Risk Management and Internal Control Regulations

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SPD-CMS-REG-00010	Regulation on Business ethics and Business integrity Committee of Salym Petroleum Development N.V.
SPD-SCM-REG-00005	Contracting and Procurement Regulation of the Company Salym Petroleum Development N.V.
SPD-HSSE-REG-00041	Regulation on Security, Business Integrity and ER Service
SPD-CMS-INS-00005	Internal Control Framework Instruction
SPD-HSSE-INS-00029	Instruction on due-diligence of applicants
SPD-IM-INS-00001	Instruction on Management of Procedural Regulatory Documents
SPD-IM-INS-00003	Instruction of Salym Petroleum Development N.V. on Management of External Regulatory and Legal Acts

The document details the following internal RLA:

SPD-CMS-MAN-00002 Ethics and Compliance Management Manual (Ethics Code) “Salym Petroleum Development N.V.”

Attachment 6.2 Terms and Definitions

The following terms and definitions are used in the document:

Anti-corruption legislation – in this case means Convention of Organization of United Nations (UN) On Counteraction to Corruption, dated 2003 (ratified by Russia), UN Convention on criminal liability for corruption (ratified by Russia in 2008), the RF Criminal Code and Federal Law “On counteraction to corruption” (dated December 25, 2008), Foreign Corrupt Practices Act (FCPA), Convention of Organization for Economic Cooperation and Development (OECD) on counteraction to bribery of foreign government officials during implementation of international business operations, Great Britain law on bribery of 2010 (against corruption in foreign countries) which prohibits to bribe foreign officials during implementation of international business operations, and also all applicable state, regional, municipal or local laws and norms prohibiting bribery or provision of illegitimate guarantees or other benefits to any government officials.

Bribe – reception by an official personally or through an intermediary of money, equities, any property or illegitimately rendered services of material nature, provision of any other material rights for actions (inaction) in favor of the briber or persons represented by him/her, if such actions (inaction) are included into job authorities of the official or if due to job position he/she may contribute to such actions (inaction), and equally for general protection or tolerance to illegitimate actions.

Corruption – corrupt practice, bribery, acceptance of a bribe, abuse of authorities, commercial subornation or other illegitimate use of position by an individual contrary to legitimate interests of the society and the state in order to receive benefit in the form of money, values, other property or material services, other material rights for himself/herself or for third parties, or illegitimate provision of such benefits to the above-mentioned individual by other individuals. Corruption is also commitment of the above-listed actions on behalf or in the interests of legal entity (Item 1, Article 1 of Federal Law dated December 25, 2008 No 273-FZ “On counteraction to corruption”).

Counteraction to corruption – activities of Federal State Power Bodies, State Power Bodies in the Russian Federation Constituents, local authorities, institutions of civil society, organizations and individuals within limits of their authorities (Item 2, Clause 1 of Federal Law dated December 25, 2008 No 273-FZ “On counteraction to corruption”):

- a) on prevention of corruption, including identification and further removal of corruption causes (prevention of corruption);
- b) on identification, prevention, suppression, disclosure and investigation of corruption offences (counteraction to corruption);
- c) on minimization and/or removal of consequences of corruption offences.

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Contractor – any Russian or foreign legal entity or individual with which the Company establishes contractual relationship, excluding labor relationship.

Facilitation Payment - a minor payment to induce a (usually low-ranking) Government Official to expedite or secure performance of a routine duty which that person is already obliged to perform and where such payment would exceed what is properly due.

Government official:

- any official or employee of any State Power Body performing functions of power representative, or performing organizational-directive, administrative functions in state authorities, local authorities, state and municipal institutions of the RD (at any level);
- any political party or a member of political party;
- any official or an employee of public international organization, for example, UN or World Bank.

Government intermediary – an individual or legal entity representing interests of the Company to government official or in government institution.

Prevention of corruption – activities of the organization focused on introduction of elements of corporate culture, organizational structure, rules and procedures regulated by internal regulatory documents providing for prevention of corruption offences.

Attachment 6.3 Abbreviations

The following abbreviations are used in the document:

ABC	Anti-Bribery and Corruption
BAC	Business Assurance Committee
MT	The Management Team