

Dated 19 04 2022

Sanctions Policy

1. General provisions

- 1.1. The Company's Policy on compliance with Sanctions restrictions (hereinafter the Policy) is the fundamental top-level document that establishes the minimum requirements for compliance with Sanctions restrictions in all jurisdictions in which the Company operates.
- 1.2. The Policy is designed in accordance with:
 - UN Security Council resolutions;
 - EU sanctions regulation;
 - UK sanctions regulation;
 - Regulations of extraterritorial nature of foreign states;
 - Applicable national laws of the Group Companies;
 - General corporate regulations reflecting the issues of Sanctions restrictions.
- 1.3. The objectives of the Policy are:
 - minimizing the risk of imposition of Sanctions, including secondary ones, on the Company;
 - deterring of activities that may include support or justification of political or military aggression, provision of asylum for criminals and terrorists, development of nuclear or other weapons programs, and violation of human rights;
 - creation in the Company of uniform effective control system in relation to Sanctions restrictions.
- 1.4. The Policy reflects the commitment of the Company management and employees to ethical standards of conducting a legal, open and politically conjuncture free business, follow the best corporate management practices and maintain business reputation at the proper level.
- 1.5. The general principles of the Policy are:
 - Compliance with Sanctions restrictions of jurisdictions in which the Company operates, is registered and/or licensed;
 - Compliance with requirements of UN, EU, UK Sanctions regime or other extraterritorial acts (if applicable) wherever the Company operates, and refusal of business that would violate the regimes of these Sanctions;
 - Taking into account by Company of regimes of Sanctions introduced by other jurisdictions, if it is appropriate for transactions;
 - Failure by Company to provide goods, works or services, even if permitted by relevant regulations, if circumstances constitute the reputational risk;
 - Refuse by Company and its employees to do business with any restricted individual so as not to violate any applicable Sanctions laws;
 - Refuse by Company to do business that would violate the export laws applicable to them.

2. Terms and definitions

Secondary sanctions

Restrictive measures of economic nature applied by international entities, country or group of countries against violators of already existing Sanctions restrictions.

Company

Company and/or its subsidiaries, partially or fully, directly or indirectly controlled by Company, as well as its separate divisions (branches, representative offices and project offices). For purposes of this definition, "control" means ownership, directly or indirectly, of more than 50% (fifty percent) of total interest.

Sanctions/Sanction restrictions

Restrictive measures of economic nature applied by international entities, country or group of countries to another country or group of countries (its individuals and entities) in order to prevent certain activities that may be expressed in complete or partial ban on import and export, as well as in limitation of financial operations with such countries, including the cross-border payments and investments.

3.

4. Measures to comply with sanctions restrictions

- 4.1. The Company determines the general strategy of the Company activities under Sanctions restrictions and regularly reviews the reports of relevant executive bodies.
- 4.2. The Company managers distribute the powers, duties and responsibilities within the framework of this Policy between employees and/or structural divisions of the Company, ensure the organization of activities aimed at implementation of principles and requirements of the Policy, including appointment of persons responsible for development, implementation and control of procedures for compliance with Sanctions restrictions.
- 4.3. Before entering into any business relationships or transactions with individuals or entities, the Company shall ensure that such relationships and transactions comply with applicable UN resolutions, EU / UK Sanctions regulations and other applicable extraterritorial restrictions by checking such individuals or entities for compliance with special Black List of individuals and other relevant Sanctions lists.
- 4.4. The Company shall review its business relationships and transactions for possible violations of Sanctions in relation to particular country, entity or individual.
- 4.5. Contracts with counterparties shall include the provisions:
 - confirming that the counterparty is not listed on Sanctions lists or is otherwise not subject to Sanctions restrictions;
 - requiring the compliance with UN resolutions, EU Sanctions regulations, UK Sanctions regulations applicable extraterritorial restrictions and this Policy;
 - requiring that counterparties not engage in or facilitate any business activities that could cause the Company to violate any applicable obligations under Sanctions;
 - the Company's right to terminate the contract in case the counterparty violates this Policy, including Sanctions lists or is otherwise subject to Sanctions restrictions.
- 4.6. The Company shall not enter into business relationships or transactions that directly or indirectly involve countries or individuals that are subject to Sanctions restrictions unless the proposed business relationships or transactions were reviewed and authorized in accordance with the applicable review systems and procedures implemented by Company from time to time.
- 4.7. The fact that the country is under Sanctions or individual is of such country does not mean automatically that the Company may not enter into any business relationships or transactions involving any such country or individual. However, the transaction shall first be carefully reviewed by compliance control division to ensure that there are no violations of legal obligations related to Sanctions. In case of doubt, the Company employees shall consult with legal division.

5. Consequences of non-compliance with sanctions restrictions

- 5.1. Failure to comply with applicable Sanction restrictions constitutes the violation of legal and/or regulatory requirements and could expose the Company to significant reputational damage, legal action and financial loss, and could expose individual employees involved in violation to significant fines or imprisonment.
- 5.2. The Company takes a zero-tolerance approach to intentional violations of this Policy or applicable Sanctions regimes. In case the employee fails to comply with this Policy, he/she can be subject to disciplinary action including dismissal. Disciplinary measures will depend on circumstances of violation and will be applied in accordance with applicable law and internal regulations of the Company.
- 5.3. The Company may terminate its business relationships with any counterparty (including termination of all existing contracts) by written notice to counterparty, with immediate effect, without need to apply to court and without any obligation to compensate for losses (direct and/or indirect) of any type or character in favor of said counterparty, in case:

- the counterparty fails to comply with any provision of this Policy and cannot remedy the situation (if it is possible to remedy it) within 10 days from the date of written notice of the counterparty of violation; or
- the counterparty is included to any Sanctions list or becomes the subject to other Sanctions restrictions.

6. Final provisions

- 6.1. Contracts and agreements concluded between the Company and counterparties may contain more specific provisions relating to some issues set out in this Policy. Nothing in this Policy supersedes any specific provision in specific contract or agreement concluded between Company and the counterparty, and in case of any inconsistency between this Policy and any other provision of specific contract or agreement, the provision in the contract or agreement shall prevail.
- 6.2. This Policy is intended to complement and not replace the other codes of conduct, policies, rules and procedures applied to employees and contractors from time to time. In case any employee or counterparty has any concerns regarding the codes, policies, rules and procedures applicable in a particular situation, or in case any employee or contractor identifies any conflict or inconsistency between this Policy and any other Company code of conduct or any other policies, he/she shall contact the legal division for clarification.
- 6.3. Legal division shall be responsible for interpretation of this Policy. For this purpose, the legal division has the right to attract specialists and experts from other structural divisions.

7. Review and amendments procedure

- 7.1. While Sanctions regimes may be amended quickly and without notice, this Policy may be updated as required.
- 7.2. Amendments to the Policy shall be made in accordance with the procedure established by relevant internal regulatory documents, including when updating the set of measures to prevent the sanctions risks.