

## **ANTI-CORRUPTION PROGRAM LIMITED LIABILITY COMPANY ENCOMPASS**

(Identification code "ENCOMPASS" - 41481738)

m. Kyiv January 19, 2020

**Preamble.** This Anti-Corruption Program LIMITED COMPANY ENCOMPASS (hereinafter referred to as the Enterprise) declares that its employees, officials, managers and founders (participants) in its internal activities, as well as in legal relations with business partners, government agencies authorities, local governments, guided by the principle of "zero tolerance "to any manifestations of corruption and will use all provided legislation on measures to prevent, detect and combat corruption and related actions (practices).

### **I. General provisions.**

1. The anti-corruption program is a set of rules, standards and procedures for detection, counteraction and prevention of corruption in the enterprise. The anti-corruption program was developed in accordance with the Law of Ukraine "On Principles of State Anti-Corruption Policy in Ukraine (Anti-Corruption Strategy) for 2014-2017 ", the Law of Ukraine " On Prevention of Corruption ", the Law of Ukraine " On amendments to some legislative acts in the country regarding the implementation of the Action Plan on the liberalization by the European Union of the visa regime for Ukraine in respect of liability of legal entities ".
2. The anti-corruption program is approved by the decision (order) of the head enterprise after its discussion with employees and officials' persons of the enterprise.
3. The text of the Anti-Corruption Program is permanently open access for employees, officials of the enterprise, as well as for its business partners.

### **II. Scope and range of persons responsible for implementation Anti-corruption program.**

1. The anti-corruption program is mandatory for all employees enterprises, including officials of all levels, managers, founders (participants), as well as for all business entities over which it is carries out, or can carry out control in the future.
2. The anti-corruption program is also applied by the enterprise in its legal relations with business partners, including public authorities and local governments.
3. Implementation of measures to implement (implement) the Anti-Corruption Program within their powers conduct:
  - 1) the founders (participants) of the enterprise- (hereinafter - the founders (participants)).
  - 2) the head of the enterprise (hereinafter - the head).
  - 3) an official of the enterprise responsible for the implementation of the Anti-Corruption program (hereinafter - the Commissioner), the legal status of which is determined by law and Anti-corruption program.

4) officials of the enterprise of all levels and other employees of the enterprise (hereinafter - employees).

The director of the enterprise and heads of structural divisions form ethical standard of negative attitude to any manifestations of corruption, filing example by one's own behavior and acquaintance with anti-corruption legislation of all employees and contractors. The director of the enterprise is responsible for the organization of all activities aimed at implementation of the principles and requirements of the anti-corruption program, including appointment of persons responsible for the development of anti-corruption measures, their implementation in life, implementation and control. All employees of the enterprise must be guided by current legislation and anti-corruption program, adhere to the principles and requirements of this program. The principles and requirements of the anti-corruption program apply to contractors and representatives of the enterprise, as well as other persons in cases when the relevant responsibilities are enshrined in the contracts, in their internal documents, or directly provided by law. The system of anti-corruption measures is based on the principle of conformity of work enterprises to the current legislation, on the principle of personal example enterprise management, and the role of enterprise management in the formation culture of intolerance to corruption and in the creation of internal prevention and anti-corruption. An important role is also played by the awareness of employees of the enterprise, involvement of employees of the enterprise and their active participation in the formation and implementation anti-corruption standards and procedures.

### **III. Anti-corruption measures in the enterprise.**

#### 1. List of anti-corruption measures in the enterprise.

1. The enterprise ensures the development and taking of measures that are necessary and sufficient to prevent, detect and combat corruption in their activities.

2. Anti-corruption measures include:

1) periodic assessment of corruption risks in the enterprise management;

2) anti-corruption standards and procedures in the enterprise.

3. The main anti-corruption standards and procedures of the enterprise are:

1) acquaintance of new employees with the content of the Anti-Corruption Program, conducting training activities on preventing and combating corruption.

2) anti-corruption inspection of business partners; The management of the enterprise and its employees are prohibited from engaging or using intermediaries, partners, agents or others to take any conflicting actions principles and requirements of this anti-corruption program or current norms anti-corruption legislation;

3) provisions on mandatory compliance with the Anti-Corruption Program.

4) criteria for selecting business partners of the enterprise on the basis of a competition, the basic principles of which are the selection of the contractor for the best competitive prices and higher quality; 5) restrictions on the company's support of political parties,

implementation charitable activities only in respect of carefully tested charitable organizations;

6) the mechanism of notification of detection of signs of violation of the Anti-Corruption programs, as well as the confidentiality of such messages and the protection of whistleblowers.

8) the procedure for reviewing whistleblower reports, including internal investigation and imposition of disciplinary sanctions.

9) norms of professional ethics and duties and prohibitions for employees.

10) mechanisms for preventing and resolving conflicts of interest.

11) restrictions on gifts.

12) supervision and control over compliance with the requirements of the Anti-Corruption Program.

## **2. Periodic assessment of corruption risks in the Company's activities.**

1. The enterprise carries out an internal assessment at least once a year corruption risks in their activities.

2. Corruption risk is a reasonable probability of occurrence of an event corruption or corruption-related offense or violation of requirements Anti-corruption program.

3. Assessment of corruption risks in the enterprise is carried out by the assessment commission corruption risks (hereinafter - the commission). The procedure and composition of the commission are approved by the head. The commission consists of the Commissioner (chairman of the commission-head enterprises), heads of structural subdivisions of the enterprise, as well as other employees appointed by the head in agreement with the Commissioner. During the corruption risk assessment on the initiative the commissioner may be involved in the work of the commission without being included in its membership other employees of the enterprise, as well as independent experts or specialists. Commissioner, to prevent conflicts of interest or bias in the work of the commission, in the distribution of functions between members of the commission takes to consider the scope of their job responsibilities in the enterprise.

4. The purpose of the commission is to prevent, detect and eliminate corruption risks in the activities of the founders (participants), managers and employees' enterprises.

5. Corruption risks in the enterprise are divided into internal and external. Internal corruption risks are identified in organizational and managerial, financial, and economic, personnel, legal procedures enterprises. External corruption risks are identified in the activities of business partners, in including public authorities, local governments, with which the company is in a business relationship.

6. Based on the results of identification of corruption risks by the commission in accordance with the order of its activities are their definition and description, classification by categories and types.

7. According to the results of the assessment of corruption risks in the activities of the Enterprise, the commission prepares a written report, which is signed by the members of the commission. The report is compiled according to the form and structure defined in the order of activity commission. The report on the results of the corruption risk assessment is submitted to the head, founders (participants) of the **enterprise and** contain:

1) identified corruption risks, as well as the reasons that give rise to them, and conditions that promote them.

2) assessment of identified corruption risks.

3) proposals for measures to prevent, eliminate (reduce) the level identified corruption risks. The text of the report is provided for review by employees of the Company as well may be published on the Company's website (if any).

8. If during the measures to assess corruption risks the Commissioner reveal the fact of violation of the Anti-Corruption Program, committing corruption or corruption-related offense, he initiates before the head of the issue conducting an internal investigation in the manner prescribed by the regulations Anti-corruption program.

9. The enterprise must be held at least once every three years external assessment of corruption risks conducted by providing organizations audit, legal or consulting services, or independent experts.

10. Based on the results of the internal and / or external evaluation report corruption risks manager, founders (participants) take the necessary measures to prevent, detect and combat corruption in the activities of the Enterprise, including by changing existing anti-corruption standards and procedures.

### **3. Description of anti-corruption standards and procedure of the Enterprise activity.**

1. In order to form an appropriate level of anti-corruption culture Authorized for new employees as well as other persons acting on behalf of Enterprises, there is a mandatory introductory acquaintance with the provisions Law, Anti-Corruption Program and related documents.

2. Provisions on the obligation to comply with the Anti-Corruption Program are included in the rules of internal labor regulations of the Enterprise, provisions on structural units, all employment contracts, and may to be included in the agreements concluded by the Legal Entity. Exemplary forms of anti-corruption warnings are developed by the Commissioner taking into account the spheres of activity of the Enterprise.

3. Business partners of the Enterprise are selected according to the criteria that are based on transparency of activity, specificity, quality of goods, works and services and reliability.

4. Criteria and procedures for selecting business partners for different areas of activity Enterprises are developed by the Commissioner and approved by the head.

5. The Commissioner conducts an anti-corruption inspection of existing or potential business partners of the Company in order to assess the availability corruption risks. In this case, the Commissioner checks whether he has a business partner the reputation of the entity whose activities are related to corruption (even for lack of relevant court decisions), and whether there will be a business partner be used as an intermediary to transfer to third parties (or to receive from third parties) illegal gain. Anti-corruption inspection is carried out in accordance with the requirements of the Anti-Corruption programs, as well as standards for various areas of activity of the Enterprise that are developed and approved by the Commissioner. Verification materials stored for at least 5 years. According to the results of anti-corruption inspection of the business partner of the Enterprise The Commissioner makes a written recommendation to the head. In case of a negative recommendation of the Commissioner, the head to continue or the beginning of a legal relationship with such a business partner must adopt a reasonable decision on this issue.

6. Enterprise (in the absence of prohibitions established by law) may make contributions in support of political parties, as well as make charitable activity only after the conclusion of the Commissioner about the absence corruption risks. The Commissioner adopts an opinion within 5 days after receiving all documents related to the implementation of these contributions or charitable activities and sends it to the head. The charitable activity of the Enterprise as a general rule should be carried out (in the absence of prohibitions established by law) only through charity organizations in accordance with the law.

7. Carrying out charitable activity of the Enterprise is not allowed if: 1) its implementation is a condition for concluding any contract, making a decision public authority, local government or carried out with in order to obtain benefits in business; 2) a business partner or a body of state power, a body of local self-government insists on carrying out one or another type of charitable activity through a certain charitable organization. The Commissioner keeps a register of support contributions made by the company political parties and charitable activities. The data in such a register are subject storage not less than 5 years. Regulations on the procedure for maintaining the said register shall be approved by the head at the request of the Commissioner.

8. To notify the employees of the Enterprise of the facts of violation Anti-corruption program, committing corrupt or corruption-related offenses (hereinafter - the message) the Commissioner places the appropriate information on information stands in the premises of the Enterprise on the official the Company's website (if any). Such information on Enterprises: phone number for messages +380674000553 Sergey Sliusarenko; address electronic mail for implementation messages: s.sliusarenko@encompass.com.ua; hours of reception of a person authorized to receive oral and written notifications every Wednesday from 10:00 to 12:00. The Commissioner develops a standard notification form. The Commissioner keeps a register of reports of violations Anti-corruption program or signs of committing corruption or related corruption offenses. The procedure for maintaining the relevant register is approved the head at the request of the Commissioner. 15 days and the procedure for consideration by the Commissioner of notifications of facts violation of the Anti-Corruption Program, committing corruption or

related corruption offenses are established in the approved position the head at the request of the Commissioner.

#### **IV. Norms of professional ethics of employees of the Enterprise.**

1. Employees of the Enterprise during the performance of their functional responsibilities must strictly adhere to generally accepted ethical standards conduct or requirements of the Code of Ethics of the Enterprise (if any).
2. Employees of the Enterprise are tolerant and respectful of politician's views, ideological and religious beliefs of others, as well as undertake not to use their powers in the interests of politics parties and / or politicians.
3. Employees of the Enterprise act objectively, regardless of personal interests, personal attitude to any person, to their political views, ideological, religious, or other personal views or beliefs.
4. Employees of the Company honestly, competently, on time, effectively and responsibly perform the functional duties, decisions and instructions of the bodies and officials to whom they are subordinated, accountable or controlled, and not allow abuse and inefficient use of funds and property Enterprises.
5. Employees of the Enterprise do not disclose and do not use in another way of confidential information that became known to them in connection with the performance of their functional responsibilities, except as provided by law.
6. Employees of the Enterprise, despite personal interests, are detained from the execution of decisions or instructions of the management of the Enterprise, if any pose a threat to the rights, freedoms or interests of individuals protected by law citizens, legal entities, state or public interests or contradict legislation.
7. Employees of the Enterprise independently assess the legitimacy of the provided management of decisions or assignments and the possible damage that will be caused in the case execution of such decisions or instructions. In the case of receiving for execution decisions or instructions that the employee He considers enterprises illegal or threatening the rights, freedoms or interests of individual citizens protected by law, legal entities, state or public interest, he must immediately in notify the immediate supervisor, or supervisor, in writing Enterprise, or its founders (participants) and the Commissioner.

#### **V. Rights and responsibilities of founders (participants) and employees (except Commissioner) Enterprise.**

1. Founders (participants), manager, employees and other persons acting from name of the Enterprise, have the right to:
  - 1) provide proposals for improving the Anti-Corruption Program;
  - 2) apply to the Commissioner for advice on implementation Anti-corruption program and clarifications on its provisions.
2. Founders (participants), manager, employees of the Enterprise are obliged to:

1) comply with the relevant requirements of the Law and the Anti-Corruption Program and related internal documents, as well as provide practical implementation of the Anti-Corruption Program.

2) perform their direct duties considering the interests Enterprises.

3) immediately inform the Commissioner, manager or founders (participants) of the Enterprise on cases of violation of the requirements of the Anti-Corruption programs (or cases of incitement to such actions), committing corruption or corruption-related offenses by other employees of the Enterprise or other natural or legal persons with whom the enterprise is or plans to be in a business relationship.

4) immediately inform in the manner prescribed by the Anti-Corruption program, the emergence of a real, potential conflict of interest.

5) refrain from behavior that can be regarded as readiness to commit a corruption offense related to the activities of the Enterprise.

6) not to commit and not to participate in the commission of corruption offenses, related to the activities of the Enterprise.

3. Employees and the head of the Enterprise are prohibited from:

1) use their official powers or their position and related opportunities to obtain undue advantage for themselves or other persons.

2) use any property of the Enterprise or its funds in private interests.

3) demand or receive any tangible or intangible benefit (for themselves or for relatives) in connection with the performance of their official duties, which is not provided by the employment or other agreement between them and the Legal person.

4) organize, be a mediator or personally carry out any cash or non-cash payments or settlements with business partners Enterprises, if such payments or calculations are not provided for in force legislation. 5) to influence directly or indirectly on the decisions of employees of the Enterprise for the purpose of obtaining any tangible or intangible benefit for oneself or for relatives, which is not provided by an employment or other agreement between them and Legal entity.

6) commit any actions that directly or indirectly incite other employees, the head of the Enterprise violation of the requirements of the Law or Anti-corruption program.

4. Upon dismissal or other termination of cooperation with the Enterprise, the person is prohibited from disclosing or otherwise using in their own interest information (confidential), which became known to her in connection with the implementation their powers, contractual obligations, except as provided by law.

5. Extorting, requesting, receiving gifts for yourself or third parties from legal entities or individuals by employees, the head of the Enterprise (directly or through other persons) in connection with the performance of their duties or their position and related opportunities are not allowed/

Employees, supervisors can accept gifts that match a generally accepted notion of hospitality (for example, gifts in the form of souvenirs, food and beverages, invitations to entertainment measures, reimbursement of transport costs and hotel accommodation), except cases where they correspond to generally accepted notions of hospitality and their value does not exceed the amounts established by law, namely, if the value of such gifts does not exceed one minimum wage set per day acceptance of a gift, once, and the total value of such gifts received from one source during the year, does not exceed two subsistence minimums, established for an able-bodied person on January 1 of the current year. There is no restriction on the value of gifts provided for in this paragraph applies to gifts that: - donated by relatives; - are received as publicly available discounts on goods, services, public winnings, prizes, prizes, bonuses.

In case of finding a gift in respect of which there is a ban on receiving it, y office space, as well as in case of receipt of a gift offer employees, the head of the Enterprise are obliged immediately, but not later than one working day, take the following measures:

- 1) refuse the offer;
- 2) if possible, identify the person who made the offer;
- 3) involve witnesses, if possible, including from among the employees Enterprises;
- 4) notify in writing the proposal of the Commissioner and the direct the head (if any) or the head of the Enterprise.

About the discovery of property that may be an illegal benefit or gift an act is drawn up, which is signed by the person who showed the illegal benefit or gift, and the Commissioner or his / her immediate supervisor or supervisor Enterprises.

In the case of property that may be an illegal benefit, or a gift detects a person who is the head of the Enterprise or the Commissioner, the act of the discovery of such property is signed by this person or a person authorized to perform duties of the head of the Enterprise in case of his absence.

6. Employees, managers, as well as persons acting on behalf of the Enterprise, refrain from offering gifts to civil servants, people deputies of Ukraine, deputies of local councils, their relatives, actual or potential business partners, their employees or representatives, as well as from any other behavior that may be construed as a willingness to commit corruption offense related to the activities of the Enterprise. Gifts may be permitted where appropriate generally accepted notion of hospitality and their value does not exceed the sizes established by the law. The general policy of the Enterprise concerning offers of gifts on behalf Enterprises within the framework of generally accepted notions of hospitality defines the head considering requirements of the legislation.

7. About each fact of offering a gift or receiving a gift within generally accepted notions of hospitality employees, the head of the Enterprise within one working day notify the Commissioner in writing the form established by him.

**VI. Rights and responsibilities of the Commissioner and his subordinates employees (if any).**

1. The authorized representative of the enterprise is appointed by its head in accordance with labor legislation and constituent documents of the enterprise.

2. The authorized person may be a natural person not younger than thirty years of age who has complete higher economic or legal education, which is capable of their business and moral qualities, professional level, state of health to perform appropriate duties.

3. A person may not be appointed to the position of the Commissioner if available circumstances specified in part three of Article 64 of the Law in cases when:

- has an outstanding or not removed in the manner prescribed by law criminal record.
- by a court decision declared incapable or whose legal capacity is limited.
- dismissed from positions in state authorities, local self-government in connection with the commission of a corruption offense or an offense, related to corruption - within three years from the date of such dismissal.

4. Any other activity is also incompatible with the activity of the Commissioner, which creates a real or potential conflict of interest with the activity Enterprises. In case of incompatibility, the Commissioner within two days from on the day of occurrence of such circumstances must notify the head Enterprises with the simultaneous submission of an application for termination of the employment contract for on its own initiative.

5. The Commissioner may be dismissed early in cases where provided by law in the case of:

- termination of the employment contract at the initiative of the Commissioner.
- termination of the employment contract on the initiative of the director of the enterprise.
- inability to perform their duties due to health conditions, respectively to the conclusion of the medical commission created by the specially authorized body executive power and implements state policy in the field of health care.

-by a court decision declaring him incompetent or restricting his civil jurisdiction legal capacity, recognition as missing or declaring him dead. The Commissioner may be dismissed on the initiative of the head Enterprise or its founders (participants) subject to the consent of the National Agency for the Prevention of Corruption. The procedure for granting such consent approved by the decision of the National Agency for the Prevention of Corruption from October 7, 2016 № 74, registered with the Ministry of Justice of Ukraine 28 November 2016 for № 1542/29672.

6. On dismissal of a person from the position of the Commissioner by the head of the Enterprise reports in writing to the National Agency for the Prevention of Corruption within two working days and ensures the immediate submission of a new candidate to the specified position.

7. The main tasks of the Commissioner are preparation, provision implementation and control over the implementation of measures to prevent, counteract and detection of corruption in the Enterprise.

8. The Commissioner exercises his rights and responsibilities directly. Before execution, the Commissioner may involve (with the consent of the head) others in his / her functions employees of the Enterprise.

9. The Commissioner shall perform his / her functions in the Enterprise independently. Interference in the activities of the Commissioner by employees, founders (participants), the head, business partners of the Enterprise, as well as other persons is prohibited. It is prohibited to impose on the Commissioner duties that do not belong to or go beyond its powers under the Law and the Anti-Corruption program or limit the exercise of their powers.

10. Founders (participants), the head of the Enterprise are obliged:

1) provide the Commissioner with appropriate material and organizational conditions labor;

2) to facilitate the performance by the Commissioner of the functions provided by the Law and Anti-corruption program;

3) promptly respond to written and oral appeals, proposals and recommendations of the Commissioner provided by him within the framework of the Anti-Corruption implementation programs;

4) at the initiative of the Commissioner to send inquiries to public authorities, local governments, enterprises, institutions and organizations independently from the form of ownership in order to obtain relevant information from them and materials required to perform the tasks assigned to the Commissioner.

11. The Commissioner for the performance of the tasks assigned to him is obliged to:

1) perform their functions objectively and impartially;

2) organize the preparation of internal documents of the Enterprise on issues formation and implementation of the Anti-Corruption Program;

3) develop and submit internal documents for approval by the head Enterprises on issues covered by the Anti-Corruption Program;

4) ensure supervision, control and monitoring of compliance employees, the head of the Enterprise Law of the Anti-Corruption Program;

5) evaluate the results of the measures envisaged Anti-corruption program;

6) ensure the preparation of a report on the status of implementation of the Anti-Corruption programs; 7) ensure cooperation with persons who are in good faith report possible violations of the Anti-Corruption Program, committing corruption or corruption-related offenses;

8) ensure the preparation and submission to the head of proposals for the plan conducting inspections of compliance with the requirements of the Anti-Corruption Program;

- 9) participate in conducting inspections and internal investigations, which conducted in accordance with the Anti-Corruption Program;
- 10) participate in the periodic assessment of corruption risks in activity of the Enterprise;
- 11) ensure the formation and maintenance of registers of employees of the Enterprise, prosecuted for violating the requirements of the Anti-Corruption Program, committing a corruption offense or an offense related to corruption: - contributions made by the Company in support of political parties and charitable activities; conducted in accordance with the Anti-Corruption Program anti-corruption inspections; - conducted internal investigations in accordance with the Anti-Corruption Program and inspections; - reports of conflict of interest and violation of anti-corruption requirements programs, committing a corruption offense or an offense, related to corruption.
- 12) organize and conduct anti-corruption inspection of business partners Enterprises;
- 13) ensure the confidentiality of information and protection of employees who reported violations of the Anti-Corruption Program, committing corruption offense or offense related to corruption;
- 14) provide to the founders (participants), manager, employees of the Enterprise clarifications and consultations related to the application of the Anti-Corruption programs; provide methodological assistance on ethical behavior, prevention and conflict of interest resolution, prevention and detection of corruption in divisions of the enterprise and the contractors of the enterprise. For this purpose, the interested person may apply in person during working hours to the Commissioner or send to his address a written request, in incl. via email. In case of detection of signs of corruption or corruption-related offense or receipt of a report of a corruption violation, The Commissioner initiates an official investigation. The Commissioner reports the materials received during the investigation to the general director of the enterprise, who takes measures to attract guilty persons to disciplinary responsibility, and in cases of detection of signs criminal or administrative offense also informs specifically authorized entities in the field of anti-corruption.
- 15) provide information to the public about the implementation Enterprise measures to prevent corruption;
- 16) participate in cooperation with public authorities, local authorities self-government, other legal entities, non-governmental and / or international organizations for the prevention of corruption;
- 17) organize activities to improve the skills of employees Enterprises on issues related to the prevention of corruption;
- 18) participate in the procedures of personnel selection of the Enterprise;
- 19) ensure interaction and coordination between structural units Enterprises for the preparation, implementation and control of implementation of measures to implement the Anti-Corruption Program; 20) perform other duties provided by the Law, Anti-Corruption program, employment contract.

12. The Commissioner for the performance of the tasks assigned to him has the right:

1) receive written and oral from employees, the head of the Enterprise clarifications on issues related to his / her powers (including during the periodic assessment of corruption risks, anti-corruption inspections of business partners, inspections, internal investigations and expertise);

2) receive information and materials from the Company's divisions copies of financial, accounting and legal documents, internal official correspondence) in relation to the activities of the Enterprise, including documents that relating to the conduct (or participation) of procurement of goods, works or services, in competitions, etc. If necessary, the Commissioner is given access to the original's documents, copies of which were given to him. In cases of inexpediency of production a significant number of copies of documents to the Commissioner by decision of the head the originals of the relevant documents to be submitted may be transferred to the subdivision return by him within three working days from the date of completion the event for which they were needed.

3) receive drafts of financial, organizational and administrative documents, agreements for their inspection for corruption risks;

4) gain access to warehouses, production facilities Enterprises, carrying out control measures in them;

5) gain access to electronic means available at the Enterprise storage and processing of data and, if necessary, require registration relevant data on certified paper;

6) to involve employees in the performance of their functions with the consent of the head Enterprises;

7) initiate the sending of inquiries to public authorities, bodies local government, enterprises, institutions, organizations of all forms of ownership to obtain from them information and materials related to the activity Enterprises;

8) initiate the issue of attracting employees, managers to liability, including dismissal in accordance with legislation;

9) apply to the founders (participants), the head of the implementation of their own powers and performance of duties in accordance with the provisions of the Anti-Corruption programs;

10) exercise other rights provided by the Anti-Corruption Law program, employment contract and job description.

## **VII. The order of reporting of the Commissioner to the founders (participants) Enterprises.**

1. The Commissioner shall at least once a year in the terms and in the order determined founders (participants) or the head, prepares the report on results of performance Anti-Corruption Program (hereinafter - the Report).

2. The report shall include information on:

- 1) the state of implementation of measures defined by the Anti-Corruption Program;
  - 2) the results of the implementation of measures identified by the Anti-Corruption program;
  - 3) identified violations of the requirements of the Law, the Anti-Corruption Program and measures, taken to eliminate such violations;
  - 4) the number and results of inspections and internal investigations;
  - 5) facts of obstruction of proper execution by the Commissioner functions, setting unreasonable restrictions for him, cases of interference in its activities by third parties;
  - 6) available proposals and recommendations.
3. If necessary, the content of the submitted Report is additionally discussed Authorized with the founders (participants) or the head of the Enterprise.
4. The general results of the implementation of the Anti-Corruption Program specified in sub-items 1, 2 of item 2 of this section of the Anti-Corruption Program are placed in public access in paper and / or electronic form, as well as on website of the Enterprise (if technically possible).

**VIII. The procedure for supervision, control over compliance Anti-corruption program, as well as evaluation of the results of implementation measures envisaged by it.**

1. The Commissioner shall supervise and constantly monitor compliance employees, the head of the Enterprise of the Anti-corruption program.
2. Supervision and control over the observance of the Anti-Corruption Program is carried out Authorized in the following forms:
  - 1) consideration and response to reports of violations Anti-corruption program, committing corrupt or corruption-related offenses;
  - 2) implementation of scheduled and unscheduled inspections of employees Enterprises for the implementation (implementation) of the Anti-Corruption Program;
  - 3) examination of organizational and administrative, legal, production and financial documents, as well as their projects.
3. If during the supervision or control of compliance The Commissioner's anti-corruption program will show signs of violations Anti - corruption program or signs of committing corruption or related corruption offense, he initiates before the head of the issue internal investigation in the manner prescribed by this Anti-Corruption program.
4. The Commissioner shall ensure the organization of the evaluation of results implementation of measures envisaged by the Anti-Corruption Program. To carry out the assessment, the Commissioner has the right to receive in writing form relevant information from employees, the head of the Enterprise about the results of the implementation of appropriate measures. The results of the assessment are summarized by the Commissioner in a written report, which it is made at least once every six months

and passed to the head and founders (participants). The assessment is carried out according to the criteria determined by the Commissioner.

#### **IX. Terms of confidentiality of informing the Commissioner by employees about the facts of violations of anti-corruption requirements.**

1. Employees of the Enterprise are guaranteed the confidentiality of their messages founders (participants), the head or the Commissioner about the revealed signs violations of the Anti-Corruption Program, corrupt or related to corruption offenses in the activities of other employees of the Company and reports of facts of incitement of employees of the Enterprise to commit corruption or corruption-related offenses.
2. Notification of detected signs of violations of the Anti-Corruption Program, a also reports on the facts of incitement of employees of the Enterprise to commit corruption or corruption-related offenses may be committed in orally or in writing, through the communication channels defined in Anti-corruption program. Messages can also be made employees and officials of business partners of the Enterprise. The manager ensures round-the-clock operation of the specified communication channels and their protection from external interference and information leakage.
3. Submission of knowingly false messages is not allowed.
4. Notification of employees of the Enterprise on the detection of signs of commission corruption or corruption-related offenses may be anonymous. Anonymous report of signs of corruption or corruption-related offenses can only be considered if when the information provided in it relates to a specific employee Enterprises or business partners of the Enterprise and contains factual data that can be checked.
5. Verification of the information set forth in the notification shall be carried out by the Commissioner, and if the notification concerns the actions of the Commissioner himself - an employee, determined by the founders (participants) or the head.
6. Any data that makes it possible to identify the person who reported The Commissioner on the facts of incitement to commit corruption or related with corruption offense or on the detection of signs of violation of the requirements Anti-corruption program, committed by employees or others corruption or corruption-related offenses belong to confidential information and are protected by law. The Commissioner and the persons involved by him in the verification set forth in the notification information, not the right to disclose it.

#### **X. Procedures for protecting employees who report information about corruption or corruption-related offense.**

1. The Head and / or the Commissioner shall, within the limits of their powers, provide conditions for the protection of persons aiding in prevention, detection, and counteraction corruption in the Enterprise.
2. Information about the employee who reported the signs of violation Anti - corruption program, identifying signs of corruption or related corruption offense (hereinafter - the whistleblower), cannot be disclosed, except cases established by law.

3. The whistleblower may not be released or forced to be released, brought to disciplinary responsibility or subjected by management to others negative measures of influence (transfer, certification, change of working conditions, refusal in appointment to a higher position, reduction of wages, etc.) or the threat of such measures of influence in connection with the notification by him of violation of requirements anti-corruption legislation and / or requirements of the Anti-Corruption Program.

4. In case of leakage of confidential information about the whistleblower, the head Enterprises, the Commissioner at the request of such an employee or on his own the initiative must immediately take all measures to avoid an offensive negative consequences for the whistleblower associated with such

5. Measures to protect the whistleblower are determined by the founders (participants) or by the head together with the Commissioner and are implemented with the written consent employee.

#### **XI. Settlement of conflict of interest in the activities of employees Enterprises.**

1. Employees of the Enterprise are obliged not later than the next working day from dates when they learned or should have learned about the existence of a real or potential conflict of interest, report it in writing immediate supervisor, not to take action and not to make decisions in the conditions real conflict of interest and take measures to resolve the real or potential conflict of interest. In the event of a real or potential conflict of interest of the head The enterprise shall notify the Commissioner and the founders in writing (participants). In the event of a real or potential conflict of interest in He notifies the Commissioner in writing to the head.

2. The immediate supervisor of the person within two working days after receipt notification of the presence of a real or potential person subordinate to his interests, as reported by the employee. The immediate supervisor, who became aware of the conflict of interest in the employee subordinate to him, is obliged to take the measures provided by the law to prevent and resolve conflicts of interest (including in the case of self-identification of the existing conflict of interest in his subordinate without implementation of the relevant message).

3. Settlement of conflict of interest is carried out with the help of one of the following measures:

1) removal of the employee from the task, actions, acceptance decision or participation in its adoption; 2) the establishment of additional control over the implementation of the employee the relevant task, the performance of certain actions or decisions;

3) restrictions on the employee's access to certain information;

4) review of the scope of functional responsibilities of the employee;

5) transfer of an employee to another position;

6) dismissal of an employee. The procedure for applying measures to resolve conflicts of interest and its features for different categories of employees of the Enterprise are established Authorized.

4. Decision on the settlement of conflicts of interest in the activities of the head Enterprises are accepted by the founders (participants).

5. Employees of the Enterprise may take measures on their own settlement of conflicts of interest by deprivation of the relevant private interest with the provision of supporting documents to the immediate supervisor and To the Commissioner. Deprivation of private interest should exclude any the possibility of hiding it.

## **XII. Procedure for providing explanations and consultations to employees Authorized.**

1. If there are questions regarding the interpretation of certain provisions of the Anti-Corruption programs founders (participants), managers, employees of the Enterprise can apply to the Commissioner for oral or written explanation.

2. The substance of the request for clarification or advice shall be set out directly to the Commissioner (on days and hours determined by the Commissioner personal reception) or by sending a memo to him or sending a written request to his e-mail address in any form.

3. The Commissioner shall provide an oral explanation during a personal reception or at in writing - no later than within 5 working days from the date of receipt of the request. The Commissioner may extend the term of consideration of the appeal, but not more than for 10 working days, which informs in writing the person who applied for explanation.

4. If during the clarification the Commissioner finds signs violation of the Anti-Corruption Program or signs of corruption or corruption-related offense, he initiates before the head of the issue conducting an internal investigation in the manner prescribed Anti-corruption program.

## **XIII. The procedure for periodic training employees in the field of prevention and detection of corruption in the Enterprise.**

1. Advanced training of employees of the Company in the field of prevention and Corruption is detected in order to provide basic knowledge on issues anti-corruption legislation, increasing the level of compliance Anti-corruption program, the formation of anti-corruption culture, as well education of intolerance to corruption.

2. Advanced training is carried out in accordance with the approved head of the Enterprise thematic plan-schedule for each semester, which prepared by the Commissioner. Further training should be provided as a measure for all employees Enterprises and individual events for the head and / or founders (participants) Enterprises. Topics and form of events (seminars, lectures, workshops, trainings, webinars etc.) for advanced training are determined by the Commissioner taking into account:

1) proposals of the head, founders (participants), heads of structural units;

- 2) the results of the evaluation of the implementation of the Anti-Corruption Program measures;
  - 3) the results of periodic assessment of corruption risks in the activity Enterprises;
  - 4) the results of internal investigations; 5) the report of the Commissioner to the founders (participants).
3. Spending time on training in the field of prevention and detection corruption accounts for at least 3 percent of total working time half a year. 4. Accounting for measures taken to improve skills in the field of prevention and detection of corruption, as well as registration of those present at the events is carried out Authorized.

#### **XIV. Application of disciplinary measures to employees who violate the provisions of the Anti-Corruption Program.**

1. If there is information indicating signs of violation employees of the requirements of the Anti-Corruption Program, the following measures are taken:

- 1) an internal investigation is appointed in accordance with the established procedure Anti-corruption program to confirm or refute information about a probable violation;
- 2) if there are sufficient grounds for the results of the internal investigation the head imposes a disciplinary sanction in accordance with the law.

2. Disciplinary sanctions are imposed by the manager on employees Enterprises in accordance with labor legislation.

#### **XV. Procedure for conducting internal investigations.**

1. In case of receipt of the message or detection of signs of violation Anti-corruption program by an employee of the Enterprise or signs of commission an employee of the Company is corrupt or related to corruption of offenses, the Commissioner shall notify the head, who shall take measures, provided for in paragraph 2 of this section. In case of receipt of the message or detection of signs of violation of requirements Anti-corruption program manager or signs of committing corruption or corruption-related offense The Commissioner shall report this founders (participants) who take the measures provided for in paragraph 2 of this section. In case of receipt of a report or discovery of facts about the commission Commissioner for corruption or corruption-related offenses, violation of the requirements of the Anti-Corruption Program, the head reports founders (participants) of the Enterprise and takes the measures provided for in paragraph 2 of this section.

2. Under the conditions provided for in paragraph 1 of this section, the founders (participants), the head is obliged to take the following measures:

- 1) within two days to initiate an internal investigation with for the purpose of confirming or refuting information about a probable violation Anti-corruption program is either corrupt or related to corruption offense;

- 2) based on the results of the internal investigation disciplinary action against the guilty persons, if there are grounds for that;
- 3) based on the results of the internal investigation to determine ways to eliminate the causes and consequences of the violation, if any, and provide for measures to prevent such actions in the future;
- 4) in case of detection of signs of corruption or corruption-related an offense for which an administrative or criminal offense is provided responsibility, immediately inform the specially authorized entities in the field of anti-corruption.

3. An internal investigation shall be conducted only in cases where or the information found relates to specific individuals and contains factual data that can be checked. The internal investigation is appointed by the head and carried out by the commission. The procedure for conducting internal investigations, which are carried out in accordance with Anti-corruption program, approved by the head. The Commissioner must be included in the commission, except for him cases where an investigation is ordered based on the findings of fact or obtaining information about the commission of corruption or related by the Commissioner with corruption offenses, violation of the requirements of the Anti-Corruption Program. The term of the investigation shall not exceed 15 days. The materials of the conducted internal investigations are stored in the archive Commissioner for at least 5 years. If according to the results of the internal investigation on the Commissioner a disciplinary sanction is imposed, this shall be notified in writing The National Agency for the Prevention of Corruption within two days from the date thereof imposition.

#### **XVI. Procedure for making changes to the Anti-Corruption Program.**

1. The head of the Enterprise ensures the organization of reverse mechanisms communication and other internal processes aimed at support and ongoing improvement of the Anti-Corruption Program.
2. The content of the Anti-Corruption Program can be revised based on the results of:
  - 1) a report on assessments of corruption risks in the activities of the Enterprise.
  - 2) implementation of supervision and control over observance of anti-corruption programs, and evaluation of the implementation of its activities;
  - 3) analysis of the performance of Authorized duties;
  - 4) conducting the Authorized survey, discussion and consultation with employees, the Manager, founders (participants) of the Enterprise and with business partners to improve anti-corruption programs.
- 3) The initiator of any change in the anti-corruption program can be Authorized, and founders (participants), Manager, employees.
- 4) Proposals for amendments to the anti-corruption program serves the Commissioner, who examines and systematizes. Once a year the Commissioner gives the head of a synthesis of the proposals for amendments to the anti-corruption program, which he entered, and provides recommendations regarding their registration or rejection.

5) Head, received from the Commissioner summarizing the proposals for amendments in the anti-corruption program, initiated a public consultation by the labor collective and the founders (participants).

In cases where the founders (participants) or Authorized insist on the urgency of making certain changes in the anti-corruption Program Director as soon as possible, but no later than 10 days from the date of receipt of such proposals, initiates appropriate discussions.

6) As a result, the approval of the proposals by the founders (participants) and employees (labor collective) Enterprise Manager approves appropriate changes to anti-corruption programs, which are its integral part.