

GIFT-GIVING AND HOSPITALITY POLICY

Business gifts, entertainment and hospitality are widely used in business as a way to express appreciation and consolidate business relationship between partners. Invitations to visit entertainment events timed with particular formal occasions, favors and small gifts could be considered appropriate subject to meeting certain requirements¹.

1. Gifts

Receiving gifts from business partners is a common practice in business relationship area. However, it is very important to ensure that such gifts do not affect objectivity of decisions taken by individuals.

Employees of the Group **are authorized to take gifts** from business partners on condition that such gifts:

- Have assessed value not exceeding \$ 200;
- Are branded promotional products of the business partner;
- Meet the following criteria:
 - Relevance i.e. suitable to the situation;
 - Adequacy i.e. type and value of the gift should be adequate to the position held by the receiving individual, his/her financial and social status;
- Do not imply any reciprocal commercial advantage;
- Do not contradict the Law and cultural habits of the country where the gift is made.

The gifts falling out of this Policy principles but, which if rejected (in the opinion of the Group employee) would be otherwise understood as offensive or even insulting for the presenting business partner could after all be accepted, however, in cases like that the Group employee receiving such gifts should deliver the gift to Business Ethics Division to be subsequently publicly auctioned for charity purposes.

Group employees **shall not accept** from business partners:

- Cash or equivalent (for example, Gift Certificates (Vouchers) or Gift Cards);
- Gifts in the form of services and/or other non-monetary benefits for example such as promise to employ.

Group employees **can make gifts** on behalf of the Company on the condition that such gifts:

- Have value not exceeding \$200 (preference should be given to the gifts included in the Promotional Products Catalogue, which could be found on the Group Intranet site);
- Do not contradict the Law and cultural habits of the country where the gift is made.
- Do not imply any reciprocal commercial advantage;
- Approved by Compliance Director of the Group and Executive President of the relevant BU of the Group (Managing / General Director) where the value exceeds \$200.

Employees **shall not make the following gifts** on behalf of the Company:

- Cash or equivalent (for example, Gift Certificates (Vouchers) or Gift Cards);

¹ In case of any doubts whether to take or make a gift or participation\ invitation for any event, Group employees should refer to Business Ethics Division for clarifications.

- Gifts in the form of services and/or other non-monetary benefits, for example, such as promise to employ.

2. Events

In business relationships participation in formal events arranged by business partners plays a significant role in strengthening mutual collaboration.

Group employees **are allowed to take invitations** from business partners **to attend events** where:

- Events are formal by status;
- It is an exhibition, conference or a business meeting;
- Purpose of the event is directly linked with business;
- Events meet local Law and cultural habits/traditions of the country of such event.

Participation in entertainment events (tourist trips) organized by business partners must be approved by the Group Compliance Director and Executive President of the relevant Business Unit of the Group (General / Managing Director).

Group employees are allowed to accept / make invitations to visit partners' **events** aimed at support and consolidation of business relationships where such invitations meet criteria of appropriateness and adequacy and approved by the immediate superior. Employees should understand that "events organized by business partner" assume presence of the Inviting Party. Invitations to events without the presence of the Inviting Party shall be regarded as gifts.

3. Government Officials

Government Officials mean individuals acting as official representatives on behalf of and under instruction from the Government, Public or Municipal Authorities of any level, International Entities, Political Parties or Candidates for any political position. By virtue of the fact that many national laws prohibit gifts to Governmental officers with the purpose of obtaining benefits, every Group employee should be confident that gifts made to such individuals will not be regarded as bribes.

Acceptable for Government Officials would be a gift containing Company logo with maximum value about Three Thousand (3000) roubles or equivalent in any foreign currency unless any other limit exists for this purpose in accordance with current law.

Events or trips organized for Government Officials would be acceptable where these contain no indication of a bribe and cannot be regarded as such and approved by Compliance Director and Executive President of the Company (General / Managing Director of the Group of companies).