



THE ANTI-CORRUPTION POLICY

OF PJSC "LUKOIL"



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1. GENERAL PROVISIONS

1.1 Purpose

This *Anti-Corruption Policy of PJSC “LUKOIL”* (hereinafter – the “Policy”) establishes the principles, key elements and activities to prevent and combat corruption, comply with Russian and foreign anti-corruption laws and international guidelines, including local laws of jurisdictions of LUKOIL Group’s presence.

The Policy reflects LUKOIL Group’s (hereinafter also referred to as the “Group”) zero tolerance to corruption. The Policy sets in detail the provisions of the *Code of Business Conduct and Ethics of Public Joint Stock Company “Oil company “LUKOIL”* dealing with the prevention and combatting corruption.

The Policy applies to PJSC “LUKOIL” and other LUKOIL Group entities. Local regulations of PJSC “LUKOIL” and other LUKOIL Group entities shall not contradict the provisions of the Policy.

1.2 Goals and objectives

The goals pursued by the Policy are as follows:

- developing zero tolerance to any forms and signs of corruption both within LUKOIL Group and in liaison with counterparties and persons representing LUKOIL Group interests and acting on the authority without a contract;
- increasing transparency of LUKOIL Group’s operations;
- encouraging honesty, integrity and responsibility; and
- securing compliance of LUKOIL Group’s operations with applicable anti-corruption laws.

The Policy’s objectives are as follows:

- determining risk-susceptible business areas in terms of potential corruptive acts and determining activities to mitigate such risks; enhancing mechanisms for corruption risk management and perfecting the relevant controls;
- managing conflicts of interest, setting up activities to identify, prevent and respond to conflicts of interest;
- raising the overall awareness of the society, business partners, counterparties, members of the governing bodies of “LUKOIL” Group entities and employees regarding the ongoing anti-corruption activities across LUKOIL Group;
- training employees and members of the governing bodies of LUKOIL Group entities on anti-corruption measures and rules set out by the Policy;
- developing an integrated anti-corruption monitoring and reporting system across LUKOIL Group;

- securing continuous and uninterrupted functioning of the alerting system (whistleblowing hotline) to report corruption offenses related to the LUKOIL Group activities; and
- identifying, investigating and communicating corruption offenses violations to law enforcement agencies.

1.3 Scope of application

The Policy is binding upon LUKOIL Group entities and their employees, including the President of PJSC “LUKOIL”, members of the Management Committee and the Board of Directors of PJSC “LUKOIL”, as well as members of the governing bodies of LUKOIL Group entities. The Policy provisions apply to interactions between LUKOIL Group entities, their business units and employees, as well as to interactions between LUKOIL Group entities and third parties. The Policy is binding upon non-employees entitled to act for and on behalf of any LUKOIL Group entity.

1.4 Policy updates

The Policy shall be amended in case of introducing any changes to applicable anti-corruption laws, its application practices, the authority of responsible persons or business units, in case of detecting lack of efficiency of anti-corruption measures and in other cases.

1.5 Terms and definitions

The following defined terms are used throughout this Policy:

Close relatives and family members – family members who may influence or be influenced by the person. They include spouses, children (minors and of majority age), brothers, sisters, parents and dependents of the person.

LUKOIL Group (Group) – PJSC “LUKOIL”, business entities and other legal entities directly or indirectly controlled by PJSC “LUKOIL”. Direct control means the ability of PJSC “LUKOIL” to directly influence decisions taken by the governing bodies of the relevant legal entity. Indirect control means that PJSC “LUKOIL” cannot directly influence decisions taken by the legal entity but through third parties (both legal entities and individuals) whose decisions PJSC “LUKOIL” has the right to direct. LUKOIL Group comprises PJSC “LUKOIL”, its subsidiaries and non-profit organizations controlled by PJSC “LUKOIL”.

United Kingdom Bribery Act, 2010 – the anti-corruption law of extraterritorial legal effect.

Foreign Corrupt Practices Act, 1977 – the U.S. federal law on combating corruption in international activities that is of extraterritorial effect.

Counterparty/potential counterparty – legal entities or individuals having or intending to have contractual relations (such as under contractor or supply agreements) with LUKOIL Group entities.

Conflict of interest – any situation in which the employee’s vested interest has or may have an impact on the proper execution of his/her job duties in a way causing harm to legal interests, including business reputation of his/her employer (a separate LUKOIL Group entity or the LUKOIL Group in general).

Corrupt practices – proposing, giving, promising, extorting or obtaining bribes, contributing to bribery, making payments to facilitate administrative, bureaucratic and other formalities in any form whatsoever, including in the form of cash funds, other items of value, services or by rendering / obtaining any improper financial or non-financial advantage from or to any persons / organizations, including public officials, public associations, private companies and political figures.

Corruption risk – risk arising out of non-compliance by the Group with applicable anti-corruption laws, as well as policies and procedures governing anti-corruption activities.

Vested interest – social, property, financial and other interest of any Group employee not related to execution of his/her job duties.

Facilitation payments – cash funds, property, property rights, services and any other financial or non-financial advantage provided to secure or accelerate any standard way of performing statutory procedures or acts that are, however, not stipulated by laws and regulations of any specific country but are related to its business practices.

Political figure – any person involved in political activity, including as a political party official.

Public official – any person exercising functions of a public official or organizational and administrative functions in governmental or local authorities, state-owned and municipal institutions, whether permanently, temporarily or based on special authority.

1.6 Regulatory framework of the Policy

The Policy is based on the following documents, among others:

International laws and standards:

- UN Convention Against Corruption (adopted in New York on October 31, 2003);
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (adopted in Istanbul on November 21, 1997);
- Criminal Law Convention on Corruption (adopted in Strasbourg on January 27, 1999);
- International Standard *Compliance Management Systems – Guidelines* ISO 19600:2014; and
- International Standard *Anti-Bribery Management Systems* ISO 37001.

Russian laws and guidelines:

- Criminal Code of the Russian Federation dated June 13, 1996 No. 63-FZ;
- Code of Administrative Offenses of the Russian Federation dated December 30, 2001 No. 195-FZ;
- Labor Code of the Russian Federation dated December 30, 2001 No. 197-FZ;

- Federal Law dated December 25, 2008 No. 273-FZ *On Combating Corruption*;
- Federal Law dated August 7, 2001 No. 115-FZ *On the Prevention of the Legalization (Laundering) of the Proceeds of Crime and Financing of Terrorism*;
- Decree of the President of the Russian Federation dated June 29, 2018 No. 378 *On the National Anti-Corruption Plan for 2018-2020*;
- Guidelines of the Ministry of Labor of the Russian Federation dated November 8, 2013 *Methodological Guidelines for the Development and Adoption by Entities of Measures to Prevent and Combat Corruption*; and
- Corporate Governance Code (recommended by Letter No. 06-52/2463 dated April 10, 2014 of the Bank of Russia to be applied by joint stock companies whose securities have been admitted to organized trading).

Foreign anti-corruption laws and international guidelines:

- Foreign Corrupt Practices Act (1977);
- United Kingdom Bribery Act (2010);
- UK Ministry of Justice Recommendations on development and implementation of appropriate procedures for the compliance with the United Kingdom Bribery Act (2010);
- Resource Guide of the U.S. Department of Justice and the U.S. Securities and Exchange Commission on the U.S. Foreign Corrupt Practices Act; and
- Transparency International: The 2010 UK Bribery Act Adequate Procedures Guidance on Good Practice Procedures for Corporate Anti-Bribery Programmes.

2. KEY ANTI-CORRUPTION SYSTEM PRINCIPLES

LUKOIL Group adheres to the following principles in its activity:

2.1 Principle of legality

In its operations, LUKOIL Group entities act in strict compliance with the effective legislation of the Russian Federation or those jurisdictions in which they carry out (either directly or through intermediaries) or intend to carry out their business. LUKOIL Group entities strictly adhere to the provisions of anti-corruption charters and conventions of which they are a party and which they join.

2.2 Principle of zero tolerance

In its business, LUKOIL Group abides by the principle of zero tolerance understood as the complete non-acceptance of corruption in any forms whatsoever, irrespective of the jurisdiction and local laws, even if such laws permit certain types of corruption (such as facilitation payments).

LUKOIL Group is not involved in, and does not encourage, any corrupt practices, including on the part of business partners, and uses its best endeavors to prevent any corrupt practices and acts that may be treated as such.

Zero tolerance to corruption also implies the prevention of any conflict of interest that arises or may arise out of any engagement with public officials, public organizations, political figures and other persons, including employees of LUKOIL Group entities, who may abuse their official or employment status in connection with any vested interest ultimately aimed at gaining benefit (either financial or not), obtaining any advantages, rewards, preferences, rebates, etc.

2.3 Segregation of incompatible duties

PJSC “LUKOIL” and other Group entities use their best endeavors to separate incompatible duties of employees and to prevent concurrent attribution to the same employee of functions of implementing any process and exercising control or evaluating performance of such process in order to minimize any potential involvement in, and concealment of, any corrupt practices.

2.4 Principle of openness and transparency

PJSC “LUKOIL” and other Group entities notify their employees, business partners, media and the society in general of their anti-corruption principles, measures taken and their improvement by making public their fundamental local anti-corruption regulations, via top management speeches, communications for employees, media publications and annual reporting.

2.5 Principle of corruption risk prevention

In the first place, LUKOIL Group’s anti-corruption activities are designed to take measures contributing to the prevention and mitigation of corruption risks to avoid any breaches of the Policy and applicable laws.

To do so, PJSC “LUKOIL” and other Group entities identify on a regular basis potential corruption risks inherent in Group’s operations in general and in separate business processes, assess the level of such risks and carry out risk-based activities to combat, prevent and respond to corrupt cases across the LUKOIL Group.

2.6 Principle of inevitability of investigating incidents

LUKOIL Group thoroughly investigates all corruption offenses and examines all reports regarding any actual or threatened offense, including conflicts of interest.

LUKOIL Group collaborates with governmental authorities, as and where required to investigate and apply any statutory punishment.

LUKOIL Group brings all persons to disciplinary liability for corruption offenses in the manner established by applicable laws, irrespective of their status, employment record or position held.

2.7 Principle of due care and diligence

PJSC “LUKOIL” and other Group entities perform due diligence of counterparties and applicants before deciding on whether to start or continue business/employment relations for their good standing, zero-tolerance to corporate fraud and corruption and for the absence of conflicts of interest.

This principle is also implemented by checking whether counterparties of LUKOIL Group entities have their own anti-corruption procedures or policies in place, whether they are ready to comply with the

Policy and incorporate provisions for compliance with applicable anti-corruption laws into their contracts and to render mutual assistance in maintaining business ethics and preventing fraud and corruption. Non-employees entitled to act for and on behalf of any LUKOIL Group entity shall confirm their readiness to comply with the Policy in writing.

3. ANTI-CORRUPTION SYSTEM ELEMENTS

3.1 Tone from the top

Senior management of the LUKOIL Group (the President of PJSC “LUKOIL”, members of the Board of Directors and of the Management Committee of PJSC “LUKOIL”, as well as members of the governing bodies of other LUKOIL Group entities, top managers) leads by example in terms of honest, good faith and independent conduct towards their subordinates, peers, business partners, other parties to business relations and the society in general.

Through personal example, senior management of the LUKOIL Group demonstrates leadership in carrying out anti-corruption activities.

Senior management of the LUKOIL Group is responsible for arranging the work and ensuring efficient performance of the system used to combat, prevent and respond to corrupt cases across LUKOIL Group entities.

The Policy is implemented by the Company’s executive bodies. The Board of Directors of the Company exercises control over the Policy compliance.

As and where required, the Management Committee of PJSC “LUKOIL” issues a resolution to appoint a business unit of PJSC “LUKOIL” in charge of arranging the work of combating, preventing and responding to corrupt cases across the LUKOIL Group.

Senior management of the LUKOIL Group is involved in implementing efficient measures to prevent corruption, including through the integration of anti-corruption procedures into business operations of the Group with the highest risk.

Through personal example, senior management of LUKOIL Group demonstrates adherence to ethical and anti-corruption principles in fulfilling their job duties, including through strict compliance with local regulations, which, among others, contributes to the creation among employees of the culture of zero tolerance to any forms of corruption.

3.2 Identification and assessment of corruption risks

LUKOIL Group regularly assesses and re-assesses corruption risks with regard to the following key factors of its business:

- the jurisdictions in which LUKOIL Group operates;
- the current and expected operations and business development plans (including new countries and jurisdictions in which LUKOIL Group may potentially start its business);
- the existing and potential counterparties with which LUKOIL Group intends to enter into business relations;

- potential and actual interaction with public officials;
- laws applicable to the industry in which LUKOIL Group operates.

LUKOIL Group performs the reassessment and update of corruption risks at least once a year and in case of making material changes to the business or organizational structure, as well as in case of introducing new or amending the existing laws.

The results of corruption risk assessment are documented and maintained in accordance with local regulations.

3.3 Conflict of interest

LUKOIL Group recognizes and respects the variety and importance of out-of-office interests of its employees. Along with that, the Group is concerned about situations where, as a result of personal, family and other circumstances, an employee of any LUKOIL Group entity ceases (or may cease) to be loyal and unbiased towards the Group. The resulting conflict between personal interests and interests of LUKOIL Group may have a negative impact on its performance. Therefore, each LUKOIL Group employee shall avoid conflicts of interest. No concealment of any conflicts of interest is permitted.

The Group has in place a set of preventive and control procedures designed to avoid any abuses of position, to identify and resolve conflicts of interest.

To set up a consistent procedure of preventing conflicts of interest and, where any conflict of interest has already occurred, to rule out its negative impact on the process and results of LUKOIL Group's business operations, the Group has drawn up a local regulation governing the activity of LUKOIL Group entities and their employees in a conflict of interest. Upon detecting any actual or potential wrongdoings, corrupt practices and conflicts of interest, internal investigations and, as and where required, additional activities aimed at identifying the causes and conditions of offenses violations are performed. The Company requires compliance with laws by its employees. Compliance with laws and local regulations by employees is considered in evaluating their performance and remuneration.

Conflicts of interest across the Group are managed in compliance with applicable laws in the following forms:

- prevention and elimination of conflicts of interest; and
- identification and resolution of conflicts of interest, elimination of their negative implications.

Conflicts of interest are prevented and eliminated, inter alia upon hiring a candidate and/or transferring an employee to another position, he/she is checked and evaluated with the use of all available legal methods for the absence of actual/potential conflicts of interest. In particular a newcomer is checked as of whether he/she held any office with civil or municipal service, and the relevant measures are taken pursuant to applicable laws.

3.4 Notification, training and advice

The Group makes its fundamental anti-corruption documents (the Policy, the *Code of Business Conduct and Ethics of Public Joint Stock Company "Oil company "LUKOIL"*) publicly available at its

official website (<http://www.lukoil.com>) in Russian and in English. As and where required, the Policy is translated into the national language of the jurisdiction in which the Group operates.

A decision to translate the Policy into the national language of the jurisdiction in which the Group operates is adopted by the head of the LUKOIL Group entity operating in such jurisdiction.

Employees are necessarily familiarized with local anti-corruption regulations with written acknowledgement upon their employment, election (appointment) to the governing bodies of LUKOIL Group entities and subsequently on a regular basis but at least once every three years, as well as upon appointment to a higher position or any position related to increased corruption risks.

Anti-corruption training of employees is performed at least once a year and is of a regular nature. Such training is based on materials that are updated on a regular basis in the event of amending local anti-corruption regulations or statutory framework.

Training materials may either be of a general nature for all employees of Group entities or reflect special aspects of activities of any employees of Group entities (for example, potential risky situations may differ depending on business processes).

If any employee has doubts or questions in respect of combating corruption, business ethics or conflicts of interest, he/she shall contact his/her immediate superior or the whistleblowing hotline.

3.5 Monitoring, control and reporting

The Group regularly monitors the existing preventive and control anti-corruption procedures for their sufficiency, relevance and efficiency, and exercises control over compliance with the same.

Based on the results of monitoring the anti-corruption system, PJSC “LUKOIL” and other Group entities identify areas of increased corruption risks and deficiencies in implementing Policy provisions and take measures to improve anti-corruption activities and controls.

As and where required, the Group carries out an independent efficiency assessment of the existing anti-corruption procedures and controls with the involvement of external consultants.

The Company incorporates information regarding ethical practices, including anti-corruption compliance, into annual reports of PJSC “LUKOIL”.

3.6 Reporting corruption offenses (whistleblowing hotline)

Each Group entity employee shall timely report actual or suspected violations of applicable anti-corruption laws and/or provisions of this Policy to his/her immediate superior or to the whistleblowing hotline and render assistance in performing related investigations.

For employees, counterparties (suppliers and clients) and other interested parties to report any actual or suspected violations of this Policy or anti-corruption laws, the Group has the whistleblowing hotline in place.

The whistleblowing hotline functions via anticorruptionline@lukoil.com and secures confidential transmission of messages.

The whistleblowing hotline accepts messages from any interested parties in the languages of the countries of presence of LUKOIL Group entities regarding any aspects of Group's operations meeting the criteria of corruption offenses, irrespective of the level at which they were committed, on a 365/24/7 basis.

The Group maintains confidentiality of the person who has reported information about any actual violations of anti-corruption laws and the established Group's practices in the area of business ethics within limitations imposed by the effective legislation.

Exerting pressure or influence on the person who has reported actual or suspected violations in good faith is prohibited (except where knowingly false information is reported).

3.7 Response to violations

Employees are personally responsible for violating the Policy and anti-corruption laws. In addition, immediate superiors bear personal responsibility for compliance by their subordinates of this Policy, the *Code of Business Conduct and Ethics of Public Joint Stock Company "Oil company "LUKOIL"* and anti-corruption procedures.

Employees in breach of the established standards and principles of combating and preventing corrupt practices may be brought to disciplinary, administrative or criminal liability pursuant to the effective legislation.

Each violation of anti-corruption provisions shall be thoroughly investigated and analyzed in the manner set forth by the Group's procedures and pursuant to applicable laws.

A standard period of preliminary internal investigation after reporting a potential corruption offense shall not exceed one month. During the investigation, the causes and possibilities of committing a corruption offense are established in order to further improve anti-corruption measures.

The Group maintains a register of corruption offenses storing information about the method of identifying any such offense, investigation conducted, punitive measures and investigation results (including the identified cause of committing an offense). The period of retaining materials regarding investigations matches the period of storing documents set forth by local regulations.

The Group collaborates with law enforcement agencies and governmental authorities in identifying and investigating corruption offenses.

4. ANTI-CORRUPTION ACTIVITIES

4.1 Gifts, hospitality and representation expenses

Offering or accepting reasonable and relevant gifts and hospitality is allowed if and only if the following conditions are met:

- a gift shall comply with applicable laws, this Policy, the *Code of Business Conduct and Ethics of Public Joint Stock Company "Oil company "LUKOIL"* and other local regulations;
- a gift shall not be directly or indirectly aimed at influencing a decision favoring the Group to be adopted by the person accepting such business gift or hospitality;

- a gift shall not give rise to any commitment towards the donor and/or shall not constitute a remuneration (including a hidden one) for the service rendered or work performed; and
- a gift shall not take the form of cash or non-cash funds, securities, precious metals and shall not constitute other types or equivalents of cash funds and/or luxury items.

Exchanging gifts and hospitality with the same public official or representative of the Group's counterparty or competitor shall not be regular.

The procedure of exchanging gifts and hospitality and of approving business gifts and hospitality is established by local regulations of LUKOIL Group entities.

4.2 Charity and sponsorship

Recognizing its role in supporting the community and carrying out charity and sponsorship activity and the special demand of certain entities and persons for such activity, the Group makes use of the existing opportunities for implementing charity and sponsorship programs.

All financial operations related to providing charity and sponsorships are accurately and fully accounted for in books and records.

The Group offers charity and sponsorship based on the following principles:

- compliance with applicable laws, principles and provisions of local regulations, including the Policy; and
- positive impact on the Group's reputation and actual efficiency in attaining socially significant goals.

The Group renders charity and sponsorship aid directly to ultimate beneficiaries and via non-profit organizations and funds. Charity and sponsorship agreements shall be necessarily supplemented with the provision on the intended use of cash funds and the submission of funds application reports to confirm their charity and sponsorship nature.

Following application of funds granted for charity and sponsorship purposes, all documents confirming the intended use of such funds shall be retained during the periods set forth in local regulations.

The Group does not provide charity and sponsorship with the direct or indirect purpose of influencing any decision to be adopted by public officials or other persons for the preservation or expansion of the Group's operations or if such assistance may be treated as an attempt to produce such influence.

4.3 Interaction with counterparties

All counterparties with which the Group interacts are subject to integrity checks. The time and resources spent on an integrity check are commensurate with the counterparty's risk profile.

The counterparty's integrity check covers the following activities:

- filling in the anti-corruption form (or notification in free form), including in respect of conflicts of interest and connections with public officials;
- analyzing and verifying information about a potential counterparty;
- analyzing and verifying documents to confirm the financial standing, assets, headcount and other details requiring verification for the expected collaboration with a potential counterparty; and
- making the anti-corruption and business ethics policy and procedures available for review and receiving a written confirmation that the counterparty has read such documents.

LUKOIL Group exercises control and monitoring of operations and strives to train counterparties to comply with the Policy throughout the entire term of contracts with such counterparties.

When establishing contractual relations with counterparties, the provisions on compliance with applicable anti-corruption laws and the Policy are incorporated into contracts with them. The Group reserves the right to terminate contracts with counterparties in case of detecting any corrupt practices on the part of such counterparties.

4.4 Involvement in political activity

The Group is not involved in any political activity. The Group does not exert, either directly or indirectly, any influence on any decisions of public officials or any other persons that affect the preservation or expansion of the Group's operations or may be treated as such.

The Group provides no financing for political parties and movements or any other activity benefiting political parties and their representatives.

Employees of Group entities may participate in any political activity, provided that such participation does not contradict their rights and duties related to employment with LUKOIL Group entities.

Employees are prohibited from signing up with social media in the name or in lieu of any other Group entity's employee, public officials or political figures ("false account") and from misrepresenting their identity.

When commenting and posting on social media information that is directly or indirectly related to the activity of the Group, governmental authorities, political parties and public organizations, employees shall clearly and unambiguously designate that their comments reflect their own opinion, rather than the official position of the Group.

Employees shall notify their immediate superiors of their intention to participate in any political activity to avoid any conflict of interest.

The Company respects and secures human rights, including the freedom of speech, and recognizes their significance. The commitment to secure human rights for employees is laid down by the *Code of Business Conduct and Ethics* of the Group.

4.5 Interaction with competitors

LUKOIL Group does not accept any manifestations of bad faith competition and abuse of dominant or monopolistic position. PJSC “LUKOIL” and other Group entities are prohibited from entering into any relations with competitors that may be treated as restricting competition or contradicting the relevant antitrust laws.

It is prohibited to enter into any agreements with competitors and/or other persons, if such agreements result or may result, among others, in:

- establishing or maintaining prices (rates), discounts, markups and/or surcharges;
- increasing, decreasing or maintaining tender prices;
- dividing the commodity market under the territorial principle, volume of selling or purchasing goods;
- decreasing the output or stopping production; and
- denying the conclusion of contracts with certain sellers or purchasers (customers).

Striving for leadership in the global oil and gas sector, having significant advantages in production and sales and playing a major role in its regions of presence, the Group supports and encourages honest, free and fair competition and avoids acts (omissions) that may cause any restriction of competition. The Company demonstrates a respectful attitude towards its competitors and interacts with them pursuant to generally accepted rules of business ethics, while complying with antitrust laws of jurisdictions in which the Group operates.

4.6 Interaction with governmental authorities and public officials

The Group strictly observes effective laws and presents its position during public discussions of draft regulations and other regulatory decisions that may directly or indirectly affect the Group’s business.

The Group does not tolerate any payments or other forms of incentives provided to representatives of governmental authorities and local governments to facilitate formalities.

All employees of the Group entities shall:

- abstain from taking any acts that may be treated as a hint, promise or guarantee of providing any cash funds, property, property rights, services and other financial or non-financial advantages in order to secure or accelerate any standard method of performing statutory procedures and acts that are not covered by applicable laws;
- not pay any expenses for or in favor of public officials, their close relatives and members of their families (such as transportation, accommodation, meals, entertainment and other expenses), except for the expenses related to the participation of such persons in official events arranged and/or financed by the Group;

- if any governmental authorities or other regulators request information – provide complete and accurate information pursuant to the procedure accepted by the Group within their competence or address such requests to the competent unit;
- contact their immediate superior and/or the competent unit, if they can't evaluate correct course of action during dealings with public officials, governmental authorities, local governments and public organizations; and
- report any violations related to dealings with public officials, governmental authorities, local governments and public organizations to their immediate superior and/or the whistleblowing hotline.

4.7 Financial, tax and managerial accounting; preparation of financial, management and other statements

Financial, tax and managerial accounting, as well as the preparation of financial, tax, managerial and other statements at the Group shall be performed in strict compliance with applicable laws and local regulations.

The Group presents all financial and business operations and transactions in financial, tax and managerial accounting and reporting accurately, timely and in sufficient detail.

Any misrepresentation or fraud in respect of financial, tax, managerial accounting data and other reporting is strictly prohibited and constitutes a breach of applicable laws to be investigated by the Group pursuant to the established procedure.

The Group arranges and exercises internal control over business transactions.

The Group has dedicated employees in charge of keeping financial, tax and managerial accounts and preparing financial, tax, management and other statements within statutory deadlines.

5. FINAL PROVISIONS

The Policy shall take effect upon its approval by the Board of Directors of PJSC “LUKOIL”. Any amendments and variations to this Policy shall be approved by the Board of Directors of PJSC “LUKOIL”.

Any issues that are not covered by the Policy shall be governed by applicable anti-corruption laws and other local regulations of the Group.

If, resulting from any changes to Russian laws or applicable foreign laws, certain provisions of the Policy come into conflict with them, the relevant provisions of Russian laws or applicable foreign laws shall apply, respectively. Any provisions of the Policy that contradict Russian laws or applicable foreign laws have no bearing on the remaining provisions of the Policy.