

# Code of Business Conduct and Ethics



## **Code of Business Conduct and Ethics of Public Joint Stock Company “Oil company “LUKOIL”**

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LUKOIL is one of the world's largest publicly traded vertically integrated oil and gas companies. The Company supplies its products, power and heat to millions of people improving their quality of life in more than 100 countries all over the world. Over 100 thousand people bring their efforts and talent together to ensure the Company's efficient development and market leadership.

References to "PJSC "LUKOIL", "LUKOIL Group", "Group", "LUKOIL", "Company", "we", and "our" throughout this document shall have the same meaning and refer to the LUKOIL Group in general, to PJSC "LUKOIL" and/or its subsidiaries, depending upon the context in which the terms are used.

## **Address by the President of PJSC “LUKOIL”**

Dear friends,

Since LUKOIL’s foundation we have been emphasizing not only business, but also the ethic qualities of our team and striving to meet the highest international standards and best corporate practices.

Determined by the large scale and extensive geography of our business, our team is represented by thousands of employees of various nationalities, ages, and cultures. At the same time, we have always been united by the corporate mission and common values, which helped us grow into a global energy company in just a quarter of a century.

Today LUKOIL is a highly trusted company among a broad stakeholder community. This trust is a priceless asset developed through the actions of each employee, each executive. Responsibility, professionalism, commitment to the promises made, knowledge of and compliance with the laws, respect of human rights, intolerance to corruption, as well as care for safety and environment are the key drivers of the Company’s sustainable development.

This means we all should adhere to the Company’s values, moral and business ethics standards in our everyday activities. All these requirements are enshrined in the LUKOIL’s Code of Business Conduct and Ethics that takes into account international practices, the Company’s specifics, as well as the principles stipulated in UN and ILO conventions.

Vagit Alekperov,

President of PJSC “LUKOIL”

## **Our Mission**

In its operations, the Company has always pursued its mission to make the energy of natural resources serve the interests of progress and mankind .

Our activities are based on the Company's corporate values that help us conduct business in line with the highest ethical standards. At LUKOIL, we are aware that the reputation does not only depend on rigorous observance of the Russian and international law as well as ensuring the respect of human rights. The Company's goodwill and success largely rely on high social responsibility and commitment to moral and ethical norms and rules.

## **Our Values**

### **Excellence and Efficient Technologies**

High performance and efficient technologies are the key success drivers for our business and a foundation for strong results. Continuous performance improvement and innovation development are the key tools towards achievement of the Company's strategic goals.

### **People**

Our key value is people who work to achieve the goals the Company sets. Whatever the Company does is done by the people and for the people. High level of expertise of our employees and ample opportunities to bring to light and develop their talent and skills for the good of the Company and the employees themselves are essential to achievement of the Company's goals.

### **Safety and Environmental Stewardship**

Our first priorities are: human life, health, occupational safety and environmental protection. LUKOIL has been rigidly following the requirements of the health, safety and environment (HSE) standards applicable in the countries where the Company operates.

### **Social Responsibility**

LUKOIL recognizes the responsibility towards all the stakeholders in the countries and regions of its presence. The Company respects national and cultural specifics, observes the rights of indigenous people, pursues a socially responsible policy in the areas of labor, employment, and industrial management, provides support to employees, disabled people, and veterans, and is engaged into broad charity and sponsorship activities.

## **Partnerships**

The Company builds and cherishes long-term relations with business partners, customers, and non-governmental organizations that are based on respect of and responsibility for the commitments made.

## **Ethics**

In its activities LUKOIL is guided not only by operational goals. It is crucial for the Company to know how and for what sake it operates. LUKOIL conducts its business in an honest, fair, respectful, decent, and open manner, rigorously meeting the commitments it takes.

## **About the Code**

The *Code of Business Conduct and Ethics of Public Joint Stock Company “Oil company “LUKOIL”* (hereinafter referred to as the ‘Code’) represents a set of rules of individual and collective conduct, defines the Company’s corporate values for employees and external stakeholders, and describes the Company’s requirements and expectations as to the compliance with the rules of ethical business conduct.

The Code regulates fundamental ethics of relations within the teams of the LUKOIL Group entities and those with external stakeholders: shareholders, authorities, business partners, competitors, customers, and the society.

The Code is available in the Russian and English languages and can be freely accessed through the Company’s websites at [www.lukoil.com](http://www.lukoil.com) and [www.lukoil.ru](http://www.lukoil.ru).

## **Target Audience**

The Code targets each and every member of LUKOIL’s team: all the employees irrespective of the position they hold (including the President, and members of the Management Committee), and the members of the Board of Directors. The Code sets common principles of business ethics and conduct to be pursued by all the employees of LUKOIL Group entities irrespective of their location.

We also urge our suppliers, contractors, and other stakeholders to share the values contained in the Code and follow the standards of business ethics.

## **Compliance with the Code**

Compliance with the Code is mandatory for all the LUKOIL team members, and is an integral working provision for all of us.

LUKOIL has operations in many countries worldwide, which means that its business is subject to a huge number of various laws, customs, and cultures. In conducting our business we must comply with the applicable law in the regions of operation. In some occasions, certain Code provisions may be inconsistent with the applicable law. Should you face instances where the applicable law imposes more rigid requirements, follow the requirements of the applicable law.

EACH OF OUR TEAM MEMBER MUST:

- comply with legal requirements;
- follow the Code provisions in day-to-day work, avoid any improper conduct;
- respect human rights and treat the colleagues with due respect;

- take care of the Company's assets and reputation, leverage the Company's resources in the efficient way;
- treat the data in a responsible manner, and never disclose any confidential information;
- avoid conflict of interest;
- be intolerable to corruption and fraud;
- take care of the environment, personal and other people's safety;
- make sure the contractor is of good record when engaging any third parties to do business with LUKOIL;
- notify of any infringements of the law and the Code in a timely manner and assist the investigation;
- should there be any questions as to the application of the Code or any doubts as to compliance with ethical standards, seek advice from the immediate superior. Should the immediate superior fail to provide sufficient explanations, seek advice from the Business Ethics Commission.

### **Additional Responsibility of Executives**

LUKOIL's executives and Management Committee members are additionally responsible for developing and maintaining the standards of behavior where employees know and understand their duties and never hesitate to inform their superiors of any doubts and matters of concern.

#### **EXECUTIVES MUST:**

- demonstrate commitment to ethical principles through their personal conduct;
- build an open communication environment in the team, wherein each employee is comfortable bringing up some issue for discussion;
- never give to the employees any instructions that constitute a breach of the law, the Code, or other local regulations;
- support the employees who initiate discussion of ethical issues acting in good faith, and assist their interaction with core subdivisions on ethical issues;
- promptly address any infringements of the law and the Code;
- take into account employees' compliance with the Code's requirements during the annual personnel performance assessment.



## Reporting Code Infringements

### *For employees*

Should you have any reliable information regarding an infringement of the Code, make sure to follow the steps below:

- advise the violator that it is inadmissible to infringe the Code provisions, and request that such actions be discontinued;
- where this doesn't work, report the infringement to the violator's immediate superior;
- should the immediate superior be involved in the infringement, fails to prevent it or is unable to do so, report the Code infringement to the Business Ethics Commission.

The Business Ethics Commission (the Commission) was established to review the issues associated with business ethics and the Code infringements. The President of the PJSC "LUKOIL" is the Chairman of the Business Ethics Commission.

Any Company's employee may apply to the Business Ethics Commission:

- by phone: +7 (495) 627-82-59;
- by email: [ethics@lukoil.com](mailto:ethics@lukoil.com).

The Business Ethics Commission reviews applications and makes appropriate decisions based on the principles of independence and impartiality.

Apart from the Commission, employees may also apply to respective trade union branches regarding infringements of the Code and their rights.

### *For customers*

The Company has a 24/7 communication system for filling station customers:

- hotline: 8 (800) 100-09-11;
- e-mail: [hotline@lukoil.com](mailto:hotline@lukoil.com).

### *For partners*

The Company has a support desk for bidders:

- hotline: +7 (495) 627-80-32;
- e-mail: [tender@lukoil.com](mailto:tender@lukoil.com).

### *For shareholders*

The Company has a Stock-Consultation Center to provide information support and advice concerning shareholder rights:

- tel.: +7 (495) 780-19-43, 8 (800) 200-94-02;
- e-mail: [fkf@lukoil.com](mailto:fkf@lukoil.com).

### *For local communities*

Representatives of local communities may apply to public relations centers of the Company's subsidiaries present in the region.

The Company guarantees that LUKOIL team members or representatives of external stakeholders who reported or are seeking to prevent any infringement of this Code in good faith, will not face any adverse consequences (including dismissal, any forms of discrimination or other persecution by anyone). The applicant is entitled to anonymity of his/her verbal or written report. The Company guarantees confidentiality in the course of inspections and those persons will only be held responsible following an impartial investigation into the infringement.

### **Infringements to be Reported Immediately**

LUKOIL supports building the environment of trust in the team, wherein any ethical issues can be discussed. However, some infringements must be immediately reported to the Business Ethics Commission:

- infringements of the law or any actions that may cause thereof, or actions that pose a risk for the Company's goodwill/reputation;
- proposal or receipt of a bribe, promise of a bribe, or other corrupt activities;
- fraud, including deliberate misstatements in the reporting documents.

## **LUKOIL as an Employer**

Our team of professionals is a key competitive advantage. Therefore, we do our best to make the Company the best place to work at. LUKOIL rigorously complies with the labor law, and seeks a reasonable balance between the work and private life of its employees respecting their out-of-work interests. The Company seeks to create a working environment that promotes the best professional and human qualities of the employees and thus improves labor productivity.

## **Human Rights and Working Environment**

The multinational LUKOIL personnel working in different countries and on different continents is valued in its diversity. The Company respects and supports human rights, and recognizes their significance. We fully support the fundamental principles of the Universal Declaration of Human Rights, Convention for the Protection of Human Rights and Fundamental Freedoms, declarations and conventions of the International Labor Organization, and other international documents on human rights. Our adherence to the said principles is demonstrated by our policies and actions not only in relations with the colleagues, but also with the customers, partners, local communities, and any other persons we cooperate with. Human rights must be observed in all countries, cultures and under any circumstances.

The Company guarantees equality to its employees, ensures that equal opportunities are provided to fulfill their performance potential and creativity.

The Company rules out any discrimination in hiring, labor remuneration, access to training, career promotion, dismissal, or retirement, including on the grounds of gender, sexual orientation, marital status, age, physical limitations, race or ethnicity, religion, political beliefs, membership in non-governmental organizations, etc. The Company rules out any forms of forced or abusive labor and child labor, as well as threats of physical, sexual or other violence, slander and any forms of violation of human dignity.

Standard labor hours are set in strict compliance with the applicable legislation in the countries of the Company's presence and as prescribed by collective bargaining agreements. Any overtime hours are always subject to the employees' consent.

LUKOIL creates the best possible conditions for continuous development of its employees to help them gain knowledge, master new technologies and labor organization forms. The Company encourages innovative approaches, and creates favorable conditions for sharing and dissemination of best practices, new knowledge, innovative ideas, projects and developments.

LUKOIL supports efficient remuneration plans for its employees offering equal payment for the labor of equal value, and providing extra incentives for the employees whose qualifications and performance drive the Company's success in accomplishment of its mission and achievement of business goals. The Company's minimum pay rate is set at the level of at least the minimum living wage of the economically active population or higher in the countries of its presence.

The Company welcomes labor dynasties, which ensure the inheritance not only of the professional experience, but also of the loyalty to the Company and commitment to its values. Belonging to a labor dynasty would not guarantee additional rights and opportunities to its members. The Company adopts zero tolerance for protectionism in any form, primarily in the form of nepotism.

The Company respects diverse mindsets of its employees belonging to different cultures, religious confessions and ethnicities. Company employees are free to form and join trade unions, enter into non-governmental organizations and collective bargaining agreements at their discretion. At the same time, the employees must bear in mind that their involvement in political, religious or other public activities must take place during non-business hours without the use of the Company's resources. The employees involved in such activities must act as private individuals rather than Company representatives, so that such involvement is not treated as the Company's political or social standpoint.

#### YOU SHOULD:

- respect human rights and each employee irrespective of the gender, sexual orientation, marital status, age, physical limitations, race or ethnicity, religion, political beliefs, membership in political, religious or other non-governmental organizations, or work experience;
- support friendly psychological climate in the team;
- work in a team, share experience with the Company's employees, disseminate best practice and work techniques, constantly seek new job-related opportunities.

#### **Health and Safety**

Human life is priceless. Therefore, safety and comfortable work environment, and promoting a healthy life style are among the Company's top priorities.

The Company makes every reasonable effort to prevent accidents and harm to human health at the workplace resulting from or in the course of performance of job duties,

eliminating, as much as possible, the causes for workplace risk factors and indemnifying employees against the loss caused by accidents.

The Company systematically evaluates the employees' working conditions, and undertakes a range of activities to maintain high level safety. LUKOIL makes sure the workplaces are fitted out in an appropriate manner, including protective equipment depending on the type of work. Company's employees regularly receive health and safety briefings and trainings.

As far as work place arrangement is concerned, the Company observes sanitary and hygienic norms, providing the employees with the opportunity to meet their basic physiological needs, including access to drinking water, hot meals, and lavatories. The same requirements apply to the Company's contractors.

We believe that the healthy life style is a basis for harmonious development of our team. We use sports as a tool for teambuilding and creating positive mindsets. Therefore, the Company supports the employees' efforts towards better health and healthy life style, and regularly holds sporting events for the employees and their families.

#### YOU SHOULD:

- take care of your personal safety and that of other people;
- know and comply with the applicable on-site safety instructions at the workplace and in transport.

### **Personal Security**

LUKOIL views solid security of its personnel and protection of their personal data against internal and external threats as a prerequisite for normal operation and development of the Company.

The Company believes that a failure to follow the generally accepted personal security rules may be detrimental to the health of the Company's personnel and goodwill of LUKOIL, or lead to financial or other losses.

PJSC "LUKOIL" provides its personnel with all required protection against emerging threats associated with performance of their duties, or in situations, where someone seeks to pressure the personnel into non-loyal conduct or activities that could be damaging to the Company, posing threats to their personal security.

The preventive effort made by the Company to shield its personnel from criminal offenses or pressure also implies that the personnel themselves must act reasonably, contributing into their personal security.

## YOU SHOULD:

- exercise caution in publishing your personal details in the public domain (on social media, etc.);
- advise your colleagues against acts or actions that could inflict harm.

## Care for the Assets, Interests, and Goodwill of LUKOIL

The Company's goodwill, standing, further successful and sustainable development is dependent on each of us. This must at all times be remembered when dealing with the assets or other resources of the Company (i. e. property, confidential information, intellectual property, funds, or equipment that the personnel are provided with).

### Conflict of Interest

PJSC "LUKOIL" recognizes and respects the variety and significance of outside goals and interests pursued by its personnel.

At the same time, the Company cannot remain unresponsive to a situation when for personal, family or other reasons a Company employee loses (or may lose) his/her loyal and unbiased attitude towards the Company. The so-formed conflict of personal interests and those of the Company may undermine its performance. This is why the Company has been consistently working to prevent such conflicts of interest.

The Company has a range of preventive and control procedures in place, designed to at all times avoid any abuse of power or conflict of interest. Identification of any possible or actual wrongdoings, abuse of power or conflict of interest triggers a formal investigation, and, if necessary, a series of additional measures to establish the causes and conditions in which the wrongdoings occurred.

Seeking to avoid conflicts of interest, one should neither directly nor indirectly be part of the customer, supplier, or competitor relations, other than by running business on behalf of the Company, nor should he/she receive loans, services, presents or other personal benefits from the said persons. A conflict of interest and its causes is always subject to disclosure. One must at all times avoid having vested interest in the operations of the Company's business partners, if such interest is in conflict with the Company's interests.

For the mechanism preventing the Board members' conflict of interest please see the *Regulations on the Board of Directors of PJSC "LUKOIL"*.

### YOU SHOULD:

- demonstrate zero tolerance to corruption and fraud;
- avoid any actions that might affect your ability to make unbiased business decisions in the best interest of the Company;
- prior to establishing relations with an entity whose interests may be in conflict with those of the Company, discuss the issue with your immediate superior and have it approved in accordance with the established procedure.

## **Integrity and Efficient Management of Assets**

Integrity and efficient management of the Company assets is the basis for LUKOIL's sustainable development and one of the Company's fundamental obligations toward its shareholders.

Any assets, including production equipment, tools, computer equipment, expendables, intellectual property, or other production facilities, used in day-to-day operations, may only be utilized for business purposes and in the best interests of the Company.

The Company personnel must protect the assets in their custody against loss, theft, non-purpose, illegitimate or inefficient use.

The Company has been proactively working to prevent corruption, theft, premeditated damage or other offenses involving its assets.

### **YOU SHOULD:**

- take good care of the Company assets, making sure that they are efficiently used to accomplish the goals set;
- refrain from using the Company assets for purposes other than the intended ones, or for personal advantage or gain.

## **Protection of Confidential Information**

Commercially sensitive, internal information, corporate restricted access information or other details of the Company's operations or development in many ways define its competitiveness on the market and are a valuable asset *per se*. Disclosures of confidential information may be detrimental to the interests and good standing of the Company, therefore each of us must protect such information and treat it appropriately.

### **YOU SHOULD:**

- use confidential data solely for the performance of official duties and in accordance with the applicable corporate procedures;
- maintain confidentiality requirements in handling or processing personal data;
- comply with the confidentiality obligations following termination of employment with the Company;
- take good care and be respectful not only of the Company data, but also of the information owned by its partners that is disclosed to you as part of relations with such partners.



## **Inside Trading and Market Manipulation**

In our work we often have to handle information about the Company's operations before such information enters the public domain. Inside information means accurate and specific information put on the Company's list of data disclosure of which may have a profound impact on the price of the Company's financial instruments. No inside information may be used for personal gain on securities markets. Besides, the Company personnel may not disclose such data to their families or other persons even after termination of their employment with the Company until such time when the information disclosed to such persons is no longer categorized as the Inside Information of the Company.

### **YOU SHOULD:**

- in an unbiased and careful manner categorize the internal information provided to you as insider information. If in doubt or unable to definitively categorize it as such, contact your immediate superior or business unit responsible for its disclosure;
- admonish fellow employees against negligence or violations as regards disclosure of information and inside dealing. If your efforts go nowhere, report to your immediate superior, business unit responsible for information disclosure or the Business Ethics Commission;
- communicate the required details of transactions involving the Company securities, or other information, as may be necessary to establish whether a transaction is or is not an interested/related party transaction, if it is your responsibility to advise the Company or the stock market regulator under the applicable law and/or the Charter of the Company.

## **Information Transparency and Reliability of Reporting**

LUKOIL keeps its operations transparent by partnering up with various stakeholders and publishing accurate and timely financial and non-financial data.

Being a public company, we fully abide by the disclosure requirements of the regulatory authorities and trade organizers, and also publish additional information, as may be required for the stakeholders to form a comprehensive and unbiased view

of LUKOIL's operations, investment or other decision-making processes at the Company.

In making its disclosures, the Company is guided by the principles of regularity, consistency, promptness, equal access, accuracy, completeness, and comparability of the data being disclosed. The Company seeks to reasonably balance the interests of the public with those of LUKOIL, maintaining the confidentiality of crucial business data capable of profoundly affecting its competitive capabilities.

LUKOIL prepares its financial and non-financial statements in accordance with the applicable standards and fully reflects, in all material respects, the financial standing and performance of the Company. Dissemination of any data that is untrue, inaccurate, misrepresented and/or detractive from the Company's goodwill is not permitted.

The Company prohibits falsification of documents, misrepresentation of any activities, and works to prevent corporate fraud or misrepresentations in financial or other statements.

## **Public Communications**

The Company has a list of persons entitled to make public statements on behalf of the Company, and established a procedure for approval and communication of information for public dissemination. When interacting with the mass media, shareholders, investors, or other external stakeholders or engaging in other public communications, the authorized persons remain responsible for adhering to the Company regulations, applicable laws, and providing information that is true and complete. Such authorized persons must assist stakeholders to form an unbiased perception of the Company and its operations, and prevent them from being misled through misrepresentation or concealment of any material information about the Company's operations.

It is not allowed to leave unattended any requests or statements made by the stakeholders, or act indifferently and/or rudely.

### **YOU SHOULD:**

- assist authorized persons in the timely provision of information that is true and accurate;
- if contacted by an external stakeholder that you are not authorized to deal with, recommend such stakeholder to contact a respective authorized business unit;

- if not duly authorized to do so, avoid making any public statements about the Company operations, including via publicly accessible websites;
- at all times show politeness and due care in communicating with external stakeholders.

## **LUKOIL and External Stakeholders**

Being aware of its corporate citizenship, PJSC “LUKOIL” seeks to build and maintain sustainable and constructive relations with every external stakeholder.

### **Shareholders**

Respect of rights and legitimate interests of the shareholders is one of the fundamental principles of the Company’s corporate governance system. LUKOIL guarantees that all of the Company shareholders are treated equally and fairly, regardless of the number of shares held by them.

The Company has created a favorable environment for the execution of the shareholder rights to participate in its management, control of the activities of the governing bodies and management of PJSC “LUKOIL”, receipt of information about the Company’s business in the most accessible ways, as well as participate in the profit distribution through dividends.

#### **YOU SHOULD:**

- in the event of a shareholder request, forward such request to a relevant authorized business unit;
- in handling personal data of the shareholders, at all times comply with the applicable laws or local regulations establishing how such personal data must be treated.

### **Governmental Authorities**

PJSC “LUKOIL” relations with governmental and local authorities are premised on the principles of compliance, transparency, cooperation, respect, and inviolability of obligations.

LUKOIL strictly abides by the laws and expresses its views in public discussions of draft regulations or other regulatory decisions capable of directly or indirectly affecting the Company’s operations.

The Company prohibits financial rewards or other practices encouraging representatives of governmental or local authorities to ease up formalities.

## YOU SHOULD:

- follow the public events engagement procedure that is in place at the Company;
- by interacting with governmental and other regulatory authorities, express solely the duly formulated official position of the Company;
- if requested by governmental or other regulatory authorities to do so, provide full and true information in the manner prescribed by the Company to the extent of your authority or forward such request to a relevant authorized business unit;
- if unable to assess, whether you are acting properly in your relations with the governmental or local authorities, or non-governmental organizations (NGOs), contact your immediate superior and/or an authorized business unit;
- upon becoming aware of any breaches of the rules governing relations with the governmental or local authorities, or NGOs, contact your immediate superior and/or the Business Ethics Commission.

## **Business Partners and Competitors**

Activities carried out by the business partners of LUKOIL have a direct impact on the Company's goodwill. This is the reason why LUKOIL partners with entities that meet the Company's highest standards on ethics, legitimacy and transparency, and respect human rights.

The supplier and contractor selection process of the Company is based on fair and competitive interaction. In this regard, the Company personnel must not have any hidden preferences or create advantages for a specific party.

The Company respects its competitors and interacts with them in accordance with the generally acceptable ethics standards and in line with the anti-monopoly laws of the countries of its presence. In its activities PJSC "LUKOIL" assumes that the anti-monopoly laws must at all times be followed. The Company has been purposefully and consistently working to enforce the anti-monopoly laws to foster a sound competitive environment on the target markets.

## YOU SHOULD:

- when engaging any third parties to do business with LUKOIL, make sure the partner is of good record and to shares the provisions of the Code;
- be specific about what the Company expects of its suppliers or other business partners;

- take measures, as provided by the statutory acts or local regulations, if any proposals or actions by the business partners fail to meet the agreed expectations or obligations.

## **Customers**

Customer relations are an important element of the Company's business. We build our customer relations on the basis of honesty and transparency. We always aspire to meet the highest service standards, deliver professional services and take care of our customers.

Each Company employee engaged in customer relations promptly responds to requests, is personally liable for the results of his/her work, takes actions, as may be necessary for proper fulfillment of his/her duties, and gives customers exhaustive advice that is in no way misleading. Customer feedback is an integral part of our development and self-improvement. Handling such feedback enables us to take prompt measures to address the issues that may arise.

The Company works towards continuous customer service improvement and delivering customer-focused services.

### **YOU SHOULD:**

- know and put into practice the components of delivering customer-focused service i. e. care for customers, professional competence, social skills;
- be polite, considerate and attentive to your customers;
- within reasonable limits assist your Customer with the selection of or provide advice on goods, works, or services, avoiding hard sell.

## **Society**

Being aware of its corporate citizenship, the Company contributes to long-term economic growth, social stability, prosperity and progress, thus preserving favorable environmental conditions and biodiversity in the areas of its presence, and ensuring efficient utilization of natural resources.

In its operations, the Company is guided by the sustainable development goals of the UN Global Compact, G20/OECD corporate governance principles, the Russian Business Social Charter (adopted at the RUIE convention in February 2008), and the Corporate Governance Code recommended by the Central Bank of Russia for enforcement across publicly traded joint stock companies, and strives to achieve a good balance between social, economic and environmental development.

Our relations with local communities and indigenous people are based on a dialogue underpinned by the principles of partnership and corporate citizenship. The Company personnel must be polite and professional, show respect for the traditions and customs of the peoples inhabiting the countries and areas where the Company operates, and express solely the official position of the Company.

We have launched a number of voluntary initiatives in different areas in order to protect and preserve the world's cultural, historic, and environmental heritage. We take good care of the environment, seeking to boost resource efficiency.

#### YOU SHOULD:

- promote prudent use of resources i. e. thrifty consumption of heat and power, water, decrease in production waste, and permitted use of territories in accordance with the nature management practices applicable in the areas covered by the Company's projects;
- forward any requests made by the local communities or indigenous people to dedicated public relations units of the Company, or public relations offices across its subsidiaries.