JOINT STOCK COMPANY

‘ZARUBEZHNEFT’

APPROVED

by the decision

of the Board of Directors

of Zarubezhneft JSC

protocol dated "\_\_" \_\_\_\_\_\_\_\_\_ 2016

№\_\_\_\_\_\_\_\_

**ANTI-CORRUPTION POLICY**

**OF ZARUBEZHNEFT GROUP OF COMPANIES**

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# **GENERAL PROVISIONS**

## Introduction

The Anti-Corruption Policy is a set of interrelated principles, procedures and specific measures aimed at preventing and suppressing corruption offenses in the activities of the Company and subsidiaries, information about which is enshrined in this Anti-Corruption Policy of Zarubezhneft Group of Companies (hereinafter referred to as the Policy).

This Policy reflects the commitment of Zarubezhneft JSC to high ethical standards for conducting an open and honest business in order to improve the corporate culture, follow the best corporate governance practices and maintain business reputation.

The Policy is the basic local regulatory document in the field of countering involvement in corrupt activities and compliance with the requirements of the applicable anti-corruption legislation of the Russian Federation, as well as the applicable anti-corruption legislation of any other country where the Company and/or subsidiaries operate or plan to operate.

## Goal

The purpose of the implementation of this Policy is to develop and implement comprehensive and consistent measures to prevent, eliminate (minimize) the causes and conditions that give rise to corruption, the formation of an anti-corruption consciousness of employees, characterized by intolerance to any form of corruption manifestations.

## Tasks

* formation of a unified understanding of the Company's position on the rejection of corruption in any form and manifestation;
* minimizing the risk of involvement of the Company and subsidiaries, employees, regardless of their position, in corrupt activities;
* prevention of corruption manifestations and ensuring responsibility for corruption manifestations;
* compensation for harm caused by corruption;
* formation of anti-corruption corporate consciousness;
* creation of a legal mechanism that prevents bribery of subjects of anti-corruption policy;
* establishing the obligation of employees to know and comply with the principles and requirements of this Policy, the key norms of the applicable anti-corruption legislation;
* creating incentives to fill positions in the Company and subsidiaries with incorruptible persons.

## Scope, duties and responsibilities of employees and structural units

1. This Policy is subject to mandatory application in the Company, as well as in subsidiaries and joint companies that have joined it. The merger procedure is established by the current Regulation on the Merger of Subsidiaries to the Internal Regulatory Documents of Zarubezhneft JSC (approved by Order № 129 of Zarubezhneft JSC dated 31.03.2014). The list of Subsidiaries that should join this Policy is contained in Appendix № 1.
2. The scope of persons subject to the Policy are employees, regardless of their position and functions performed. All employees of the Company and subsidiaries are responsible for compliance with the principles and requirements of this Policy, as well as for the actions (inaction) of their subordinates that violate these principles and requirements. This responsibility is reflected in the job responsibilities of employees.

Persons guilty of violating the requirements of this Policy may be subject to disciplinary, administrative, civil or criminal liability at the initiative of the Company or subsidiaries, law enforcement agencies or other persons in the manner and on the grounds provided for by the legislation of the Russian Federation, local regulations and labor contracts, as well as, in appropriate cases and if there are grounds, in accordance with the applicable laws of foreign states, on the territory of which the Company or the subsidiary conducts or plans to conduct activities.

1. The Company establishes and includes in the employment contract with the employee the obligations of the employee in connection with the prevention and combating corruption.

The main content of the general duties of employees in connection with the prevention and counteraction of corruption can be the following:

* refrain from committing and/or participating in committing corruption offenses in the interests or on behalf of the Company and/or subsidiaries;
* refrain from conduct that may be interpreted by others as a willingness to commit or participate in the commission of a corruption offense in the interests or on behalf of the organization;
* immediately inform the employer in accordance with the established procedure about cases of inducing an employee to commit corruption offenses;
* immediately inform the employer in accordance with the established procedure about information that has become known to the employee about cases of corruption offenses committed by other employees, counterparties of the organization or other persons;
* inform the employer in accordance with the established procedure about the possibility of a conflict of interest, or about the employee's conflict of interest.

For certain categories of employees (for example, for the management of the Company and subsidiaries, persons responsible for the implementation of anti-corruption policy, employees whose activities are associated with corruption risks, persons exercising internal control and audit, etc.), additional obligations are established, including special anti-corruption procedures and requirements.

1. Structural units of the Company and subsidiaries in the course of procurement / supply of works, goods, services are required to include in the terms of contracts concluded with counterparties a clause on strict compliance with the requirements and principles of applicable anti-corruption legislation, this Policy - an anti-corruption clause.
2. Responsibility for the prevention of corruption and other offenses is assigned to the heads of subsidiaries and structural units of the Company.
3. The General Director of Zarubezhneft JSC determines the structural unit responsible for organizing risk management and internal control in the field of preventing and combating corruption in the Company and the group of companies as a whole. The main responsibilities of such a unit in this area are:

* development and submission for approval to the General Director/Board of Directors of draft internal regulatory documents of the Company aimed at implementing measures to prevent corruption;
* carrying out control measures aimed at identifying corruption offenses by employees;
* organizing the assessment of corruption risks;
* consideration/participation in the consideration of reports on cases of inciting employees to commit corruption offenses in the interests or on behalf of another organization, as well as cases of corruption offenses committed by employees, contractors or other persons;
* organizing the completion and consideration of declarations of conflict of interest;
* organization of training events on prevention and combating corruption and individual counseling of employees;
* rendering assistance to authorized representatives of control and supervision and law enforcement agencies during their inspections of the activities of the Company and subsidiaries on issues of preventing and combating corruption;
* rendering assistance to authorized representatives of law enforcement agencies in carrying out measures to suppress or investigate corruption crimes, including operational-search measures;
* evaluation of the results of anti-corruption work and preparation of relevant reporting materials to the General Director of the Company.

## The period of validity of the Policy, the procedure for making changes

This Policy is applicable without limitation of validity.

The initiators of making changes to the Policy may be the heads of subsidiaries, structural units of the Company, the Corporate Risk Management Committee, the General Director of the Company, the Board of Directors of the Company.

The Corporate Security Department of the Company (hereinafter referred to as the CSD) is responsible for the timely introduction of changes to this version of the Policy.

The Policy (changes to it) is approved by the Board of Directors of the Company.

# **BASIC CONCEPTS, DEFINITIONS AND ABBREVIATIONS**

For the purpose of application in this Policy, as well as for use in anti-corruption activities in general, the following concepts, definitions and abbreviations apply:

|  |  |
| --- | --- |
| **Concept, abbreviation** | **Definition** |
| **Group of companies Zarubezhneft JSC (Group of companies)** | Zarubezhneft JSC and subsidiaries that have joined this Policy |
| **Company** | Zarubezhneft JSC |
| **Subsidiary** | subsidiaries of Zarubezhneft JSC |
| **CSD** | The Corporate Security Department of Zarubezhneft JSC |
| **Close persons and relatives** | close relatives - spouse, parents, children, adoptive parents, adopted children, siblings, grandfather, grandmother, grandchildren.  close persons - persons (with the exception of close relatives) whose life, health and well-being are dear to a representative of the state, a public organization or an employee of the Company due to established personal relationships |
| **Due diligence** | a principle based on the concepts of reasonableness and good faith formulated in the current legislation, according to which the Company and its employees are responsible when performing business operations or making managerial decisions, including for obtaining, prior to the emergence of contractual relations, information sufficient to form a reasonably justified opinions on the presence of signs of dishonesty of the counterparty or job candidate |
| **Counterparty** | any Russian or foreign legal entity or individual with whom the Company enters into contractual relations, with the exception of labor relations |
| **Conflict of interest** | a situation in which the personal interest (direct or indirect) of the employee affects or may affect the proper performance of his/her duties and in which a conflict arises or may arise between the personal interest of the employee and the rights and legitimate interests of the Company and / or the subsidiary, which can lead to harm rights and legitimate interests, property and/or business reputation of the Company and/or the subsidiaries of which he/she is an employee |
| **Employee's personal interest** | the employee's interest related to the possibility for the employee to receive income in the form of money, valuables, other property or monetized services, other property rights for himself or for third parties in the performance of official duties |
| **Corrupt actions** | offering, giving, promising, soliciting or receiving bribes, mediating bribery, making payments to simplify administrative, bureaucratic and other formalities in any form, including in the form of money, other valuables, services, or providing / receiving unreasonable material or intangible benefits from any persons/organizations or to any persons/organizations, including representatives of the state, public groups, private companies and politicians |
| **Facilitation payments** | payments intended to expedite the standard course of action in connection with business practices in a particular country, related to compliance with the procedural requirements of applicable law (with the provision of licenses, permits, visas, provision of utility services, etc.) and not enshrined in legislative and country-specific regulations |
| **State Representative** | * a person who permanently, temporarily or by special authority performs the functions of a representative of state or municipal authorities * a person who permanently, temporarily or by special authority, performs organizational and administrative or administrative and economic functions in a state body, local self-government body, in a state or municipal institution or in the Armed Forces of the Russian Federation or another military formation of the Russian Federation |
| **Representative of a public organization** | * any official or employee of a public organization |
| **Political figure** | a person professionally engaged in political activities, including as functionaries of political parties |
| **Employee** | an individual who has entered into labor relations with the Company or its subsidiaries |
| **Private interests of the employee** | any personal, social, property, financial, political and other interests of the employee or his close persons and/or relatives |
| **Applicable legislation** | provisions of the legislation of the Russian Federation, legislative and regulatory legal acts of foreign states on the territory of which the Company and / or subsidiaries are represented |
| **Self-Interest** | the interest of an employee of the Company or subsidiaries, his close persons and / or relatives in obtaining intangible benefits and other intangible benefits. Promotion and acknowledgment are not personal gains |
| **Material benefit** | economic benefit in cash or in kind that can be assessed and defined as income in accordance with the tax legislation of the Russian Federation |
| **Monitoring** | anti-corruption monitoring of measures taken by the Company in the field of combating corruption, carried out in order to ensure an assessment of the effectiveness of these measures; analysis and evaluation of data obtained as a result of observation; development of forecasts of the future state and development trends, relevant activities |
| **Anti-corruption expertise** | activities to prevent the inclusion in draft documents, provisions that contribute to the creation of conditions for the manifestation of corruption; to identify and eliminate such provisions in existing documents |
| **Anti-corruption clause** | section of agreements, contracts of the Company and/or subsidiaries declaring that the Company and/or subsidiaries carry out an anti-corruption policy and develop a culture that does not allow corruption manifestations |

# **MAIN PART**

## Basic principles of anti-corruption policy

* 1. Rejection of corruption.

The Company and subsidiaries do not accept corruption in any form and manifestation in the course of both operating, investment and other types of activities.

The principle of non-acceptance of corruption means a strict prohibition for employees and other persons acting on behalf of the Company and / or subsidiaries or in its interests, directly or indirectly, personally or through any mediation, to participate in corrupt practices, regardless of business practices in a particular country.

The Company and subsidiaries emphasize the inadmissibility of corrupt practices, including manifestations of a conflict of interest, both in relation to representatives of the state, public organizations, private companies, politicians and other third parties, and in relation to employees of the Company and subsidiaries through abuse of official position in order to extract any personal gain.

* 1. Compliance with current legislation.

The anti-corruption measures implemented by the Company and subsidiaries must comply with the Constitution of the Russian Federation, international treaties concluded by the Russian Federation, the legislation of the Russian Federation and other regulatory legal acts applicable to the Company and/or subsidiaries.

* 1. Unconditional observance.

The anti-corruption requirements of the applicable legislation and internal regulations must be unconditionally and strictly observed by all employees of the Company and subsidiaries, regardless of their position, term of work, status and other conditions.

* 1. Inevitability of punishment.

The Company and subsidiaries declare an uncompromising attitude to any forms and manifestations of corrupt practices at all levels of corporate governance, investigates all reasonably justified reports of violations of proper procedures to counter involvement in corrupt activities and holds those responsible to account without regard to their position, term of work, status in the Company and / or subsidiaries, other relationships with them in accordance with the procedure established by law and local regulatory documents of the Company and subsidiaries.

The Company and Subsidiaries reserve the right to publicize information about persons who have violated the requirements of applicable law and this Policy.

* 1. Top management personal example.

All senior officials of the Company and subsidiaries, realizing their key role in shaping a culture of intolerance towards corruption and in creating an internal system for preventing and combating corruption, set a personal example with their behavior, including declaring, demonstrating and putting into practice an uncompromising attitude towards any forms and manifestations of corruption both within the Company and subsidiaries, and in relations with contractors and representatives of state bodies.

* 1. Openness to the business community, involvement and training of employees.

The Company and subsidiaries make reasonable efforts to inform all employees about the applicable anti-corruption procedures and requirements, openly declare this to third parties, up to the publication of this Policy on the Company's corporate website and the inclusion of relevant anti-corruption provisions in contracts.

The Company and subsidiaries urge their employees and interested third parties to report their suspicions about possible violations and cases of non-compliance with the provisions of this Policy and applicable anti-corruption legislation as soon as possible, as well as to propose recommendations and measures to improve the system for combating involvement in corruption activities.

Messages can be transmitted in the following ways with the option to remain anonymous:

* to the security hotline of Zarubezhneft JSC, information about which is posted on the official website of the Company and its subsidiaries;
* directly to the CSD or the unit responsible for organizing risk management and internal control in the field of preventing and combating corruption, as well as to officials in the subsidiaries responsible for ensuring security;
* to your immediate or superior manager.

The Company and the Subsidiaries guarantee the confidentiality of all employees and other persons who report violations in good faith.

The Company and subsidiaries contribute to raising the level of anti-corruption culture by informing and systematically training employees in order to maintain their awareness of anti-corruption policy issues and mastering the methods and techniques for applying anti-corruption policy in practice.

* 1. Regular risk assessment.

The Company and subsidiaries periodically identify, review and evaluate corruption risks specific to its activities in general and to individual potentially vulnerable areas and business processes in particular.

* 1. Adequacy and effectiveness of anti-corruption procedures.

The Company and subsidiaries develop and implement a system of appropriate procedures (measures) to combat and prevent involvement in corrupt activities. The Company and subsidiaries strive to make procedures not only as transparent, clear and feasible as possible, but also reasonably responsive to identified risks, low cost, easy to implement and bring significant results.

* 1. Exercising due diligence.

The Company and subsidiaries check contractors and job candidates before making a decision to start or continue business relations for their reliability, rejection of corruption and the absence of a conflict of interest.

* 1. Refusal of retaliatory measures.

The Company and its subsidiaries state that no employee can be sanctioned if they report in good faith an alleged fact of corruption, other abuses or the lack of effectiveness of existing control procedures, or if they refuse to give or receive a bribe, commit commercial bribery or provide mediation in bribery, including if, as a result of such a refusal, the Company and / or subsidiaries incurred losses, lost profits, or did not receive commercial and / or competitive advantages.

If an employee of the Company and/or subsidiaries or any other person provides knowingly false information or tries to obtain personal benefit that is contrary to the interests of the Company and/or subsidiaries, then such person may be held liable in accordance with the current legislation and internal regulatory documents of the Company or its subsidiaries.

* 1. Monitoring and control.

The Company and subsidiaries regularly monitor the relevance (legality) and effectiveness of the anti-corruption procedures implemented in its activities and control their compliance. The specified principle is implemented by the system of internal control and audit of the Company and subsidiaries, as well as through periodic external audit and involvement of external independent experts.

Based on the results of monitoring and control, the Company and subsidiaries improve the system of measures to implement the anti-corruption policy and/or update this Policy.

## Main areas of action and requirements of the Policy

* 1. Gifts and representational expenses.

The Company and the Subsidiaries recognize the exchange of business gifts and representational expenses, including for business hospitality, as a necessary part of doing business and as a common business practice. The Company and the Subsidiaries strongly encourage an atmosphere of honesty and transparency regarding business gifts and business hospitality expenses.

At the same time, the Company and subsidiaries consider this area vulnerable in terms of the risk of involvement in corrupt activities, therefore, all such actions carried out on behalf of the Company and/or subsidiaries or in its/their interests must meet the following criteria:

* fully comply with the applicable laws, the Code of Corporate Ethics and other local regulatory documents of the Company and/or subsidiaries;
* not have a direct or indirect goal of influencing the adoption by representatives of the state, public organizations, private companies, politicians or other persons of decisions that affect the preservation or expansion of the activities of the Company and / or subsidiaries;
* not imply the emergence of any obligations to the donor or organizer of business hospitality events;
* not create a reputational or other risk for the Company and/or subsidiaries, their employees and other persons in case of disclosure of information about gifts or representation expenses;
* not be cash or non-cash money, securities, precious metals and not represent other types or equivalents of money and/or luxury items.

All expenses for business gifts and business hospitality must be approved by the management of the Company and/or the Subsidiary.

* 1. Charity, sponsorship and financial assistance

The Company and subsidiaries do not provide charitable, sponsorship and financial assistance with the direct or indirect purpose of influencing the adoption by representatives of the state, public formations or other persons of decisions that affect the preservation or expansion of the activities of the Company and / or subsidiaries, or if such assistance can be objectively perceived as an attempt to make such an impact.

Information on the expenses of the Company and subsidiaries for the provision of charitable and sponsorship assistance is open.

* 1. Participation in political activities.

The Company and Subsidiaries do not finance political parties, organizations and movements in order to obtain commercial advantages in specific projects of the Company and/or subsidiaries.

The Company and subsidiaries do not participate in political activities with the direct or indirect purpose of influencing the adoption by representatives of the state, public organizations, political figures or other persons of decisions that affect the preservation or expansion of the activities of the Company and / or its subsidiaries, or if such participation can be objectively perceived as an attempt to exert such an influence.

Information about the costs of participation in political activities is open.

Any employee of the Company or subsidiaries has the right to personally participate in the political life of the Company in his free time from his work activity. Personal participation of employees in political life, their corresponding financial and time expenses are completely voluntary and should not interfere with their activities in the Company or subsidiaries.

* 1. Interaction with representatives of the state or public organizations.

The Company and subsidiaries refrain from paying any expenses of representatives of the state or public organizations, as well as their close persons and / or relatives, or in their interests, including the receipt by them at the expense of the Company and / or subsidiaries of material or other benefits, with a direct or indirect purpose obtaining any commercial and/or competitive advantages.

* 1. Interaction with contractors, intermediaries and other persons.

The Company and subsidiaries refrain from engaging contractors, intermediaries, agents, partners and other persons acting on behalf of the Company and/or subsidiaries or in its interests, and from participating in joint ventures to perform any actions that violate the principles and requirements of this Policy, of the Code of Corporate Ethics and/or creating a reputational risk for the Company and/or subsidiaries, their employees and other persons in case of disclosure of information about their commission.

Before making a decision to start or continue cooperation with a counterparty, intermediary or other person or participation in a joint venture, the Company and Subsidiaries:

* collects, analyzes and checks information about potential counterparties and joint venture partners, about their reputation, rejection of corruption and the absence of a conflict of interest;
* informs them of the principles and requirements of this Policy;
* takes any legal measures to prevent and resolve conflicts of interest, including by regulating related party transactions.
  1. Accounting records maintenance

The Company and its subsidiaries strictly comply with the requirements of applicable law and the rules for maintaining reporting documentation. Carrying out business transactions without reflecting them in accounting, distortion or falsification of accounting, management and other types of accounting data or supporting documents are regarded as corporate fraud and are investigated in the manner established by the internal regulatory documents of the Company and subsidiaries, applicable law.

* 1. Audit and control.

The Company and subsidiaries ensure regular external and internal audits of the internal control system, in particular, the accounting and management accounting systems, as well as control over compliance with the requirements of applicable law and internal regulations, including the principles and requirements established by this Policy.

Since the Company and/or subsidiaries may be held liable for the participation of its employees, counterparties and other persons acting on behalf of the Company and/or subsidiaries or in its interests in corrupt activities, all reasonable suspicions of corrupt acts must be thoroughly investigated. in the manner prescribed by internal regulations and applicable law.

## Main anti-corruption measures

The list of the main activities implemented in order to prevent and combat corruption is presented in Table № 1.

Table № 1

**List of main anti-corruption measures**

|  |  |
| --- | --- |
| **Direction** | **Measure** |
| Regulatory support, setting standards of conduct and declaration of intent | Implementation and updating of the Code of Corporate Ethics |
| Enactment and updating of the provision on conflict of interest, declaration of conflict of interest |
| Development, adoption and maintenance of up-to-date rules (regulations) detailing and arranging practical actions related to the exchange of business gifts and business hospitality |
| Joining the Anti-Corruption Charter of the Russian Business |
| Application of an anti-corruption clause in contracts |
| Inclusion of anti-corruption provisions in the employment contracts of employees and job responsibilities |
| Development, introduction, monitoring and improvement of special anti-corruption procedures | Introduction, maintenance and improvement of available feedback channels (‘security hotline’) in order to implement a procedure for informing employees and other persons about corruption violations, regulation of the hotline |
| Introduction of procedures for informing employees of the employer:   * on cases of inciting them to commit corruption violations and consideration of such reports; * about information that has become known to the employee about cases of corruption offenses committed by other employees, contractors of the organization or other persons and consideration of such reports; * on the occurrence of a conflict of interest and the procedure for resolving the identified conflict of interest |
| Introduction of procedures for the protection of employees who reported corruption offenses in the activities of the organization from formal and informal sanctions |
| Conducting a periodic assessment of corruption risks in order to identify areas of activity most exposed to such risks and develop appropriate anti-corruption measures |
| Formation and updating of the list of positions associated with a high corruption risk and the introduction of special anti-corruption measures in relation to employees replacing them, including filling out declarations of conflict of interest upon employment and annually |
| Rotation of employees holding positions associated with a high corruption risk |
| Training and informing employees | Annual familiarization of employees against signature with regulatory documents regulating issues of preventing and combating corruption |
| Carrying out training activities on prevention and combating corruption |
| Individual advice to employees on the application (observance) of anti-corruption standards and procedures |
| Ensuring compliance of the internal control and audit system with the requirements of the anti-corruption policy | Regular monitoring of compliance with internal procedures |
| Implementation of regular control of accounting data, availability and reliability of primary accounting documents |
| Regular monitoring of the economic feasibility of expenses in areas with a high corruption risk: exchange of business gifts, representational expenses, charitable donations, remuneration to external consultants, etc. |
| Engagement of experts | Periodic external audit |
| Engagement of external independent experts in the implementation of economic activities and the organization of anti-corruption measures |
| Evaluation of the results of the ongoing anti-corruption work and distribution of reporting materials | Carrying out a regular assessment of the results of work on combating corruption |
| Preparation and distribution of reporting materials on the work carried out and the results achieved in the field of combating corruption |

For the practical implementation of the above activities, as well as instructions and recommendations of the General Director, the Board of Directors, the shareholder and the Government of the Russian Federation in the field of preventing and combating corruption, the Company may develop and approve a detailed plan for the implementation of specific anti-corruption measures, as well as a plan (program) for the development , implementation and ensuring the functioning of measures aimed at preventing and combating corruption, indicating specific activities, deadlines (for execution) and responsible executors.

Appendix № 1

to the Anti-Corruption Policy of Zarubezhneft Group of Companies

**List of subsidiaries of Zarubezhneft JSC,**

**which are recommended to join this Policy**

|  |  |
| --- | --- |
| **№ /**  **unit** | **Name of the Entity** |
|  | Arсtiсmorneftegazrazvedka JSC |
|  | RMNTK Nefteotdacha JSC |
|  | Orenburgnefteotdacha JSC |
|  | Ulyanovskneftegaz LLC |
|  | NeftegazInKor JSC |
|  | Zarnestservice LLC |
|  | Zarubezhneftestroymontazh LLC |
|  | Explon llc |
|  | JC RUSVIETPETRO LLC |
|  | VNIINEFT JSC |
|  | Giprovostokneft JSC |
|  | Zarubezhneft-dobycha Samara LLC |
|  | Zarubezhneft-dobycha Kharyaga LLC |
|  | OPTIMA Grupa d.o.o. |
|  | Oil Refinery Brod A.D. |
|  | Modriča Motor Oil Plant A.D. |
|  | Nestro Petrol A.D. |

**Дочерние предприятия**

Appendix № 2

to the Anti-Corruption Policy of Zarubezhneft Group of Companies

**Key questions   
to the Anti-Corruption Policy of Zarubezhneft Group of Companies**

1. What is the purpose of implementing the Anti-Corruption Policy?
2. Who is covered by the Anti-Corruption Policy?
3. What are the main principles of the Anti-Corruption Policy?
4. Does the scope of the Anti-Corruption Policy include issues related to charitable, sponsorship and financial assistance?
5. Which category of employees is covered by the provision of the Anti-Corruption Policy on the annual completion and submission of a conflict of interest declaration?