



**Effective since
April 11, 2022**

**ANTI-CORRUPTION POLICY
LLC SIBUR AND COMPANIES OF PJSC SIBUR HOLDING**

1. Terms

1.1. This Policy uses the terms defined in the Criminal Code of the Russian Federation, the Code of Administrative Offences of the Russian Federation, RF Supreme Court Plenum Ordinance No. 19 dated October 16, 2009 "On Judicial Practice in Cases of Misuse of Powers and Office Abuse", RF Federal Law No. 273-FZ dated December 19, 2008 "On Countering Corruption:

Corruption is abuse of office, giving a bribe, receiving a bribe, abuse of powers, commercial bribery or any other illegal use by an individual of their official position contrary to the legitimate interests of society and the state in order to obtain personal benefits in the form of money, valuables, other property or monetized services, other property rights for themselves or third parties, or illegal provision of such benefits to this individual by other individuals, as well as committing of the above acts on behalf or in the interest of the Employer.

Corruption Countering are activities of federal public authorities, public authorities of constituent entities of the Russian Federation, local governments, civil society institutions, organizations and individuals within the limits of their authority.

Giving a bribe is transfer of money, securities, other property or monetized services to an Official, a Foreign Official, or an Official of a public international organization, personally or through an intermediary.

Official is a person who performs the functions of a Representative of the authorities or performs organizational and command or administrative and economic functions in state bodies, local self-government bodies, state and municipal institutions, as well as in the Armed Forces of the Russian Federation, other troops and military formations of the Russian Federation on the permanent or temporary basis, or in accordance with special powers.

Foreign Official is any appointed or elected person, who holds any legislative, executive, administrative, or judicial office in a foreign country, and any person, who performs any public function for a foreign state, including a public agency or a public enterprise.

Official of a public international organization is an international civil servant or any person authorized by such an organization to act on its behalf.

Commercial bribery is an illegal transfer of money, securities, other property, provision of monetized services, provision of other property rights to a person, who performs managerial functions in a commercial or other organization, for performance of actions (failure to act) in the interests of the bribe giver with regard to the official position held by this person.

1.2. This Policy uses the terms defined in the Corporate Dictionary located at: <https://social.sibur.ru/group/607/files/>:

Compliance is compliance of activities of LLC SIBUR, companies of PJSC SIBUR Holding and their employees with the requirements of the applicable laws, in-house standards or any other mandatory documents.

Anti-Corruption Program (Anti-Corruption Compliance) is a system of actions and procedures developed by the Company and companies of PJSC SIBUR Holding to ensure compliance with applicable anti-corruption laws.

Corruption offence is an unlawful act (failure to act) with elements of corruption.

Corruption prevention is the Company's activity aimed at introducing elements of corporate culture, organizational structure, rules and procedures regulated by internal regulatory documents, which ensure prevention of corruption offenses.

Corruption risk is a possibility that (under certain conditions) authorized persons may act or fail to act with a view to illegally obtain benefits, when exercising their powers.

Compliance System is a set of elements of corporate culture, values, organizational structure, rules and procedures governed by internal regulatory documents and implemented by functional areas, which ensure that employees of LLC SIBUR and companies of PJSC SIBUR Holding follow the principles of the Compliance System, regardless of their position.

Conflict of interests is any situation or circumstance, where an employee's personal interests or activities, or those of their close relatives, prevent or may prevent this Employee from acting in the best interests of the SIBUR Group honestly, in good faith, without bias, and effectively performing their duties.

Personal interest is a possibility that an Employee (and their close relatives) may receive income in the form of money, valuables, other property or monetized services, property rights or other benefits for themselves or third parties, when performing their employment duties.

Counterparty is a legal entity or an individual, who has assumed obligations under a contract.

2. General provisions

- 2.1. The Anti-Corruption Policy (hereinafter the "Policy") defines main goals and objectives of LLC SIBUR and companies of PJSC SIBUR Holding (hereinafter the "SIBUR Group") for preventing and combating corruption in accordance with the requirements of Russian and international legislation, as well as subject to the best international practices.
- 2.2. The requirements of this Policy apply to all employees of the SIBUR Group, regardless of their position, as well as to third parties, acting on behalf and/or in the interests of the SIBUR Group, including individuals, legal entities and their representatives, where the respective responsibilities are set forth in contracts with them or are expressly provided for by law.
- 2.3. The Policy is part of the Compliance System and establishes the managerial and organizational framework for preventing corruption (corrupt practices), including actions to minimize and/or eliminate the consequences of corruption offenses, as well as objectives, functions, powers, responsibilities, monitoring and supervision.
- 2.4. The SIBUR Group expects that all its employees and third parties will agree with ethical principles set forth in the PJSC SIBUR Holding's Code of Corporate Ethics and requirements of this Policy.

3. Anti-Corruption Goals and Objectives

- 3.1. This Policy has been developed to identify, prevent and minimize unlawful, unethical and corrupt behavior by employees of the SIBUR Group.
- 3.2. The main objectives of the SIBUR Group's Anti-Corruption Policy are as follows:
 - Establish corruption combating principles and rules in the SIBUR Group.
 - Create effective mechanisms, procedures and controls as well as take other actions aimed at countering corruption and minimize risks of SIBUR Group and its employees getting involved in corrupt activities.
 - Develop a common understanding of the principles and requirements of this Policy among employees and third parties.
 - Develop a culture of ethical behavior and intolerance of all manifestations of corruption, including a unified standard of anti-corruption behavior among employees.
 - Introduce an anti-corruption system into strategic and operational management at all levels of activities of the SIBUR Group.
 - Inform management bodies of the SIBUR Group about corruption offenses and counter-corruption actions taken.
 - Apply civil penalties for corruption offenses.

4. Principles of the Anti-Corruption Program

- 4.1. The SIBUR Group is guided by the following principles, when developing its Anti-Corruption Program:
 - 4.1.1. Compliance of the SIBUR Group's activities with applicable laws and internal regulations.
 - 4.1.2. Management's leadership to build a zero-tolerance corruption culture within the SIBUR Group.
 - 4.1.3. Involvement of employees in implementation of anti-corruption standards and procedures.
 - 4.1.4. Compliance of anti-corruption procedures with corruption risks.
 - 4.1.5. Efficiency of anti-corruption procedures.
 - 4.1.6. Unavoidability of punishment for corruption, regardless of position, length of service and other conditions, if any employee commits a corruption offense when performing their job duties.
 - 4.1.7. Transparency in informing counterparties, partners and the public about the Company's anti-corruption business standards.
 - 4.1.8. Continuous supervision and regular monitoring of the anti-corruption program.

5. Officials responsible for implementation of the Anti-Corruption Policy

- 5.1. For efficient countering of corruption, the SIBUR Group has appointed a person in charge of anti-corruption activities supported by other officers and functional units, involved in developing and monitoring of anti-corruption actions and procedures.

6. Main corruption countering actions

6.1. Management's leadership (the tone from the top)

- 6.1.1 The management of the SIBUR Group (including members of the Board of Directors, General Director and line directors) strives for its employees' understanding that all forms and manifestations of corruption are totally unacceptable. The management shows personal example of ethical behavior, compliance with applicable anticorruption laws and requirements of internal regulatory documents, when performing their job duties.
- 6.1.2 *The tone from the top* is aimed at building a culture of ethical behavior based on the principles of objectivity, honesty, transparency and openness.
- 6.1.3 The management of the SIBUR Group develops an anti-corruption program and monitors compliance with it.
- 6.1.4 The General Director of LLC SIBUR will take actions aimed at implementation of this Policy and appoint persons in charge of developing anti-corruption procedures, as well as implement and monitor them.

6.2. Identification and analysis of corruption risks

- 6.2.1 The SIBUR Group routinely identifies and analyzes corruption risks, inherent in its financial and economic activities due to their specific nature, with regard to its presence in different regions and countries, its organizational structure and other factors.
- 6.2.2. As part of corruption risk identification and analysis and for introduction of appropriate anti-corruption procedures and/or other actions, the SIBUR Group outlines specific business processes and areas of activity with increased risks.
- 6.2.3. The SIBUR Group believes that it is required to manage corruption risks, regardless of their likelihood or exposure.

6.3. Consulting and training of employees

- 6.3.1. If employees of the SIBUR Group have any questions about the provisions of this Policy or any other anti-corruption actions and procedures, they may seek advice by emailing to compliance@sibur.ru.
- 6.3.2. The SIBUR Group arranges regular training for employees on corruption prevention and countering according to its Plan with goals and objectives of the training, category of trainees and the training format (offline or online).

6.4. Monitoring and supervision

- 6.4.1 The SIBUR Group monitors efficiency of the implemented anti-corruption program and procedures as well as assesses their sufficiency and relevance for their improvement.
- 6.4.2 The SIBUR Group implements the following procedures to monitor and supervise efficiency of the anti-corruption system:
 - Monitor changes in applicable anti-corruption legislation and law enforcement practices to identify elements of the anti-corruption system to be improved and/or amended in order to ensure its relevance and compliance with applicable laws.
 - Analyze changes in the SIBUR Group's activities (including its organizational structure, areas of activity, interaction with counterparties) to determine their impact on anti-corruption procedures and the need to adjust them.
 - Analyze the internal supervision environment of the SIBUR Group to identify its weaknesses and ineffective supervision procedures to adjust them and ensure reliability and efficiency of the anti-corruption system.
 - Monitor compliance of employees with anti-corruption requirements and procedures, including identification of corruption offense indicators as part of the regular internal audit of the SIBUR Group activities.
- 6.4.3 The SIBUR Group's anti-corruption system is monitored by and reported to the Ethics and Discipline Committee of LLC SIBUR.
- 6.4.4 This Policy shall be amended, if there are any doubt about efficiency of actions implemented based on the monitoring results.
- 6.4.5 The main results are published on the official website or otherwise disclosed.

6.5. Internal investigations of identified offenses

- 6.5.1 Economic Security Department jointly with Compliance Department of LLC SIBUR and companies of PJSC SIBUR Holding shall verify information on violation of this Policy. If necessary, employees of other functional areas or companies of the SIBUR Group may be involved.
- 6.5.2 Where necessary and when required by applicable law, the SIBUR Group shall cooperate with law enforcement and other regulatory authorities to identify and investigate corruption offenses as well as take actions against the offenders.

6.6. Audit

- 6.6.1. The SIBUR Group conducts regular internal and external audits for compliance with applicable laws and internal regulations, including compliance with the principles and requirements set forth in this Policy.

6.7. Organization of Compliance Hotline

- 6.7.1 The Compliance Hotline is a secure and confidential information channel that allows information to be transmitted anonymously.
- 6.7.2 Employees of the SIBUR Group and other third parties who become aware of a violation or inducement to violate the provisions of this Policy and/or applicable anti-corruption laws must immediately report it in any of the following ways:
- hotline website <https://sibur.deloitte-hotline.ru>,
 - email address sibur-hotline@deloitte.ru,
 - email address compliance@sibur.ru,
 - toll-free telephone number +7 (800) 500-08-74.
- 6.7.3 Information about violations of this Policy shall be subject to careful review by the SIBUR Group within a specified time frame.
- 6.7.4 The report on inspection activities will be submitted to the Ethics and Discipline Committee of LLC SIBUR for review.
- 6.7.5 The SIBUR Group guarantees confidentiality for all applicants.
- 6.7.6 Employees will not be subject to sanctions (dismissal, demotion, loss of bonus, etc.) if they report the alleged fact of corruption and if they refuse to give or receive a bribe, commercial bribery or mediation in bribery, including if such refusal resulted in the SIBUR Group losing profit or not obtaining a commercial or competitive advantage.
- 6.7.7 If a report is made with malicious intent as knowingly false, such as to defame or obtain any preferential treatment or to avoid liability, the employee will be subject to disciplinary action in accordance with applicable law.

7. Fundamental requirements for individual risk areas

7.1. Business gifts, business hospitality and entertainment expenses

- 7.1.1 The SIBUR Group defines basic rules and restrictions on the receipt/giving of gifts and business hospitality in connection with the performance of official duties by employees, including criteria for allowed and unallowed gifts and reasons for accepting/giving such gifts. Any unauthorized gifts must be declined/returned to the giver at the time of giving.
- 7.1.2 The giving and receiving of business gifts, business hospitality and hospitality expenses on behalf and/or for the benefit of the SIBUR Group and its employees must meet the following requirements
- comply with applicable laws, this Policy, the Code of Conduct, and other internal regulations.
 - not be directly or indirectly intended to influence decision-making affecting the SIBUR Group's business by the person receiving the business gift, business hospitality token or participating in events financed by entertainment expenses.
 - not imply any obligation to the giver and/or not represent remuneration (including covert remuneration) for the service or work performed.
 - not pose a reputational or other risk to the SIBUR Group, employees and other persons in case of disclosure of information on business gifts/business hospitality/ entertainment expenses.
 - be appropriate, reasonable and proportionate to the specific occasion/event.
- 7.1.3 Employees are permitted to participate in entertainment and social events held by third parties that are available to all employees regardless of their job title or position within the SIBUR Group.
- 7.1.4 Employees may not give gifts, make contributions for political purposes, or organize entertainment for political parties or candidates for political office on behalf of the SIBUR Group.

- 7.1.5 Permissible limits for business gifts, business hospitality and entertainment expenses given to and received from and for the benefit of employees shall not exceed 3,000 rubles.
- 7.1.6 When receiving or providing business gifts, hospitality, and entertainment as part of their job duties and/or representing the SIBUR Group, employees must ensure that they comply with the SIBUR Group's anti-corruption principles and requirements, for which they are personally responsible.
- 7.1.7 Souvenirs bearing the SIBUR Group logo given at exhibitions, public presentations, forums and other marketing events in which the SIBUR Group officially participates are allowed and considered as promotional or informational materials.

7.2 Charity and sponsorship activities

- 7.2.1 SIBUR Group has developed a systematic approach to charitable activities as part of its corporate charity program *The Formula for Good Deeds*.
- 7.2.2 The participants of the process and the main areas of charitable activities, which cover, among other things, sponsorship of socially significant projects, are set forth in the Memorandum of Corporate Social Responsibility and Charitable Activities available at www.formula-hd.ru.
- 7.2.3. Charity shall not include advertising services.
- 7.2.4. Charitable assistance shall be provided to individuals in exceptional cases in accordance with the established procedure when they submit petitions and documents confirming the validity of such assistance to an individual citizen.
- 7.2.5. In accordance with this Policy and implemented procedures, the SIBUR Group shall not finance or otherwise participate in charitable and/or sponsorship activities in order to obtain any improper advantages or preferences in connection with business activities.

7.3. Conflicts of interest

- 7.3.1. The SIBUR Group respects the rights of its Employees as individuals and recognizes their right to engage in lawful labor, financial, business, political and other activities in their leisure time. The SIBUR Group intends to maintain an environment that enables Employees to perform their duties fairly, openly and without bias.
- 7.3.2. The SIBUR Group shall refrain from any actions that may cause a conflict of interest with any business partners and counterparties.
- 7.3.3. The SIBUR Group has established a procedure for disclosure of Conflict of Interest upon hiring, transfer to a new position, regular declaration of Conflicts of Interest and disclosure of information as the relevant situations or circumstances arise.
- 7.3.4. Prevention or settlement of a conflict of interest may consist in changing the position of a SIBUR Group employee in accordance with the procedure established by the applicable laws of the Russian Federation.
- 7.3.5. When deciding on a particular method of resolving a conflict of interest, the significance of the employee's personal interest and the likelihood that such personal interest will be realized to the detriment of the SIBUR Group's interests shall be taken into account.
- 7.3.6. Concealment of a current or future Conflict of Interest, or deliberate untimely or incomplete disclosure of a Conflict of Interest for any reason, is unacceptable and will be considered improper performance of employment duties.
- 7.3.7. In order to regulate and prevent conflicts of interest in employees' activities and possible negative consequences of conflicts of interest for SIBUR Group, we have adopted the *Guidelines. Regulations on Conflict of Interest Management at LLC SIBUR*, and also included a section in the Employment Contracts with SIBUR Group employees.

7.4 Information about hiring former state and municipal employees

- 7.4.1 The officer responsible for the registration of labor relations, in the case of an employment contract (civil law contract) with a citizen who held certain positions of state or municipal service, within two years after his/her dismissal from state or municipal service, shall notify the employer / his representative at the last place of his/her service in accordance with the legislation of the Russian Federation.

7.5 Public and Political Activities

- 7.5.1 The SIBUR Group does not participate in political or religious organizations or finance their activities. Employees participating in political, religious or other social activities may act in these cases only as individuals and not as representatives of the SIBUR Group, and only outside working hours.

7.6 Payments through intermediaries or to third parties

- 7.6.1 The SIBUR Group, members of the Board of Directors and employees are prohibited from engaging or using SIBUR Group Representatives or other third parties to perform any actions that are contrary to the requirements of this Policy or applicable anti-corruption laws, and from making payments if it is (or should be) reasonably certain that all or part of such payments will be used for corrupt purposes.
- 7.6.2 The SIBUR Group shall not make "facilitation payments" (administrative, bureaucratic or otherwise) to authorities, public officials or other persons, i.e. shall not provide money, property, property rights, services or other tangible or intangible benefits to enable or expedite the execution of standard procedures or actions not provided for in laws and regulations of a particular country.
- 7.6.3 The SIBUR Group shall refrain from paying any expenses for public officials and their close relatives (or for their benefit) in order to obtain commercial advantages in specific SIBUR Group projects, including expenses for transportation, accommodation, entertainment, PR campaigns, etc., or to obtain other benefits at the expense of the SIBUR Group.

7.7 Interaction with counterparts

- 7.7.1 When establishing business relationships with counterparties, the SIBUR Group focuses on:
- business reputation of potential counterparties, their shareholders and beneficial owners,
 - counterparties' systems of compliance with anti-corruption laws,
 - willingness to comply with the requirements of this Policy,
 - willingness to include anti-corruption clauses in contracts,
 - availability of anti-corruption regulations and procedures.
- 7.7.2 The SIBUR Group shall inform potential counterparties about the anti-corruption principles and requirements set forth in this Policy, in particular, by including anti-corruption clauses in the contracts concluded, and by posting information on the SIBUR Group's external website, in the Compliance section.

8. Responsibility

- 8.1. All SIBUR Group employees, regardless of their position, shall be personally responsible for compliance with the principles and requirements of this Policy, as well as for the actions (or inactions) of their subordinates that violate these principles and requirements.
- 8.2. Employees found guilty of violating anti-corruption laws and the requirements of this Policy may be subject to disciplinary action, up to and including termination of employment, as well as other forms of liability in accordance with applicable law.

9. Concluding Provisions

- 9.1. This Policy may be amended in the event of changes in the laws of the Russian Federation or applicable international laws, as well as taking into account new trends in global and Russian corporate conduct practices.
- 9.2. In the event that certain provisions of this Policy conflict with the applicable laws of the Russian Federation, the provisions of the applicable laws of the Russian Federation shall apply.
- 9.3. If certain provisions of this Policy conflict with traditions, customs or perceptions of the relevant rules of conduct, the provisions of this Policy shall apply. 9.3.
- 9.4. By posting this Policy or its individual provisions on the official website, the SIBUR Group openly declares its rejection of corruption, welcomes and encourages compliance with this Policy by all employees, counterparties and other third parties, and promotes an anti-corruption culture in society and among SIBUR Group employees.
- 9.5. The SIBUR Group cooperates in the area of anti-corruption with state and regulatory authorities, as well as with societies and associations, partners and counterparties.

10. Reference documents

10.1 Statutory requirements

- UN Convention Against Corruption (Adopted by the UN General Assembly at its 51st plenary session on October 31, 2003, ratified by the Federal Law of the Russian Federation, No. 40-FZ, dated March 8, 2006).
- Criminal Law Convention on Corruption (concluded in Strasbourg, 27.01.1999 ETS No. 173, ratified by the Federal Law of the Russian Federation No. 125-FZ dd. 25.07.2006).
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (adopted on 21.11.1997 ratified by the Federal Law of the Russian Federation No. 3-FZ dd. 01.02.2012).
- Federal Law of the Russian Federation No. 273-FZ dd. 25.12.2008 'On Countering Corruption'.
- Code of the Russian Federation on Administrative Offenses No. 195-FZ dd. 30.12.2001.
- Criminal Code of the Russian Federation No. 63-FZ dd. 13.06.1996.
- Russian Federation Civil Code No. 51-FZ dd. 30.11.1994 (Part I).
- Russian Federation Labor Code No. 197-FZ dd. 30.12.2001.
- Methodological recommendations on the development and adoption by organizations of measures to prevent and combat corruption, approved by the Ministry of Labor and Social Development of the Russian Federation dd. 08.11.2013.
- The UK Bribery Act (UK Bribery Act, 2010).
- The U.S. Foreign Corrupt Practices Act (1977).
- Anti-Corruption Charter of Russian Business (ACRB) of the Russian Union of Industrialists and Entrepreneurs dd. 20.09.2012.

10.2 Fundamental internal regulations on anti-corruption

This Policy and internal documents form the basis of SIBUR Group's anti-corruption system:

- LLC SIBUR Code of Corporate Ethics.
- Compliance Policy of LLC SIBUR and companies of PJSC SIBUR Holding.
- Regulations on the Ethics and Discipline Committee of LLC SIBUR.
- Regulations on the Ethics and Discipline Committee of SIBUR Holding LLC.
- SR/09-01-04/MU01 Guidelines. Regulations on Conflict of Interest Management at SIBUR Holding LLC.
- SR/09-02/PL02 Personal Data Processing Policy.