

<p style="text-align: center;"><b>SIBUR Holding</b></p> <p style="text-align: center;"><b>SIBUR</b></p>	<p style="text-align: center;"><b>SIBUR LLC</b></p>
<p><b>Process owner</b> <b>Member of the Board – Managing Director, Business Administration and Government Relations, Business Administration Support</b></p>	<p><b>Date of introduction 11 May 2022</b> <b>Process Manager</b> <b>Director, Legal Support. Intellectual Property. Bidding Committee</b></p>
<p style="text-align: center;"><b>STP SR/09-01-04/MU01</b></p> <p style="text-align: center;"><b>Guidelines. Policy on Managing Conflicts of Interest</b></p>	

**Revision 2.3**

**Moscow**  
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### Registration of changes

Revision	Date of approval	Date of introduction	Details of approving document
1.0	24.05.2013	24.05.2013	Order No. 90/CP, dated 24 May 2013
2.0	12.12.2016	12.12.2016	Order No. 101/CP, dated 12 December 2016
2.1	08.08.2017	08.08.2017	Order No. 89/CP, dated 8 August 2017
2.2	07.08.2018	07.08.2018	Order No. 54/CP, dated 07 August 2018
2.3	11.05.2022	11.05.2022	Order No. 40/CP dated 11 May 2022

## **1. Field of application**

1.1 These Guidelines. Policy on Managing Conflicts of Interest (hereinafter - "Policy") has been developed as part of 09-01-04 Conflict of Interest Management process.

1.2 The purpose of this document is to manage conflicts of interest and increase confidence in SIBUR LLC and SIBUR Holding PJSC's companies by all stakeholders.

1.3 This Policy is part of the compliance system of SIBUR LLC and SIBUR Holding PJSC companies and establishes the managerial and organizational framework for preventing conflicts of interest, including potential conflicts of interest and measures to minimize and/or eliminate their consequences.

1.4 This Policy shall not supersede the need to comply with applicable Russian Federation law. In the event of a conflict between the requirements of the Policy and the requirements of applicable Russian Federation legislation, the requirements of the legislation shall prevail.

## **2. Main requirements**

2.1 Each situation that could fall within the definition of a Conflict of Interest shall be reviewed on a case-by-case basis. Examples of situations in which a Conflict of Interest may arise are set out in Schedule 2 hereto.

2.2 The termination of a Conflict of Interest shall be understood to mean that the circumstances giving rise to the Conflict of Interest have ceased to exist or cease to be material.

2.3 In certain circumstances specified by law, failure to comply with the requirements of this Policy may result in disciplinary, civil, administrative or criminal proceedings.

2.4 SIBUR LLC and SIBUR Holding PJSC companies shall not be liable for the actions of their Employees who violate this Policy.

## **3. General principles of managing conflicts of interest**

3.1 SIBUR LLC and SIBUR Holding PJSC companies honor the rights of their Employees as individuals and recognize their right to engage in lawful employment, financial, entrepreneurial, political and other activities outside of their main employment hours. SIBUR LLC and SIBUR Holding PJSC companies intend to maintain an environment that enables Employees to perform their duties fairly, openly and without bias.

3.2 Employees shall act in the interests of SIBUR LLC and SIBUR Holding PJSC companies in the performance of their employment duties and shall take measures to prevent any possibility of a Conflict of Interest. Employees shall not abuse their official position.

3.3 Employees may not participate or influence directly or indirectly a business, management or other decision, process or transaction made by SIBUR LLC and/or SIBUR Holding PJSC companies if they have a Conflict of Interest.

3.4 Concealment of a current or potential Conflict of Interest, or deliberate untimely or incomplete disclosure of a Conflict of Interest for any reason, will not be tolerated and will be considered misconduct by the employee. Employees have a duty to disclose in a timely

manner any Conflict of Interest they have and to participate in the resolution of Conflicts of Interest. SIBUR LLC and SIBUR Holding PJSC companies shall guarantee to Employees confidentiality of the process of disclosing details of a Conflict of Interest and the process of resolving it.

3.5 SIBUR LLC and SIBUR Holding PJSC companies shall guarantee compliance with the applicable laws of the Russian Federation when resolving a Conflict of Interest.

3.6 SIBUR LLC and SIBUR Holding PJSC companies guarantee that no retaliatory actions will be taken against an Employee or any other person who reports a violation or potential violation of this Policy. If an Employee knowingly communicates false information that discredits the honor and dignity of another person, he/she may be held liable in accordance with the applicable laws of the Russian Federation.

3.7 The following requirements for disclosure of Conflict of Interest are established in SIBUR LLC and SIBUR Holding PJSC's companies:

- at the time of hiring;
- when transferring to a new position;
- annual declaration of conflicts of interest;
- as situations or circumstances arise.

The Human Resources function shall collect the details referred to in clause 3.7 at the time of hiring and transfer in order to forward the questionnaire to the Compliance Department and the Economic Security Function for verification.

The Compliance Department and the Economic Security Function in their turn shall verify the information received from the HR Department and shall inform about potential conflicts of interest that may be identified when making HR decisions at SIBUR LLC and SIBUR Holding PJSC's companies. If such situations are identified, the Compliance Function and the Economic Security Function shall send the information for review to the Committee for Ethics of SIBUR LLC or the Ethics and Discipline Commissions of SIBUR Holding PJSC's companies.

3.8 Disclosure of details of a Conflict of Interest shall be made in writing in accordance with the requirements of this Policy and local regulations of SIBUR LLC and SIBUR Holding PJSC companies. Details of Conflict of Interest shall be full, clear, accurate and not misleading.

3.9 Employees shall report immediately:

- if they or other employees are in a Conflict of Interest situation;
- purchase, ownership or disposal by the Employee of shares or securities of third-party Business Entities which are or seek to become Counterparties or competitors of the SIBUR Group, the Employee's intention to take up a position in a management body, to take up part-time employment, or to perform work or provide services for such Business Entity before such actions or transactions are carried out. At the same time, if an employee intends to purchase publicly traded shares or debt securities of the aforementioned Business Entities, the employee is advised to

notify of the above if the Employee's share (direct or indirect), following the transaction, exceeds 1% of shares (1% of borrowed capital for debt securities) of the aforementioned Business Entity.

3.10 Employees shall report any Conflict of Interest or other circumstances referred to in this Policy to: [compliance@sibur.ru](mailto:compliance@sibur.ru). The communication must contain the name, position of the Employee and a full and clear description of the circumstances giving rise to the Conflict of Interest or other circumstances set out herein.

3.11 If Employees are in doubt about the existence of a Conflict of Interest or the way in which particular circumstances should be assessed, they should seek clarification from the Compliance Department at: [compliance@sibur.ru](mailto:compliance@sibur.ru).

3.12 Members of the Management Board of the Managing Company and Executive and Managing Directors shall, in the event of a Conflict of Interest or any other circumstances referred to in these Guidelines, immediately notify the General Director of SIBUR LLC or send a notice thereof to: [compliance@sibur.ru](mailto:compliance@sibur.ru).

3.13 Information about Conflicts of Interest received from an Employee shall be subject to scrutiny and review by the Compliance and Economic Security Department.

3.14 The outcome of the review of the situation shall be decided in the manner prescribed in Section 4 of this Policy.

3.15 Each conflict of interest is a unique situation and therefore a variety of methods can be used to manage it, including:

- situation or circumstances do not constitute a Conflict of Interest upon review and consideration by the Committee for Ethics and Discipline or the Ethics and Disciplinary Commission;
- establishing certain rules of conduct for the employee affected by the Conflict of Interest;
- establishing information barriers and special procedures for access to confidential information;
- reconsideration of the duties of employees in the manner and under the conditions provided for by the effective law;
- transfer of an employee to a position that does not involve a Conflict of Interest, in accordance with the procedure and under the conditions provided for by applicable law;
- permanent or temporary voluntary refusal of an employee or his/her suspension from participation in the discussion and decision-making process on matters that are or may be affected by a Conflict of Interest;
- employee's waiver of his/her private interest that creates a conflict with the interests of SIBUR LLC and/or SIBUR Holding PJSC companies;
- dismissal of an employee for disciplinary offences on the grounds set out in the

applicable employment law;

- refusal to enter into a transaction if the Conflict of Interest cannot be resolved by other means;
- other forms of resolving the Conflict of Interest that may be reached as a result of agreement.

3.16 Employees shall mitigate any consequences of a Conflict of Interest, including minimizing loss or damage to SIBUR LLC and SIBUR Holding PJSC companies, should the latter occur.

3.17 In respect of Conflicts of Interest related to fraudulent or corrupt practices, the General Director of SIBUR LLC/ General Director of a Company shall have the right to solely acknowledge if there is or there is no Conflict of Interest for employees of SIBUR LLC/ SIBUR Holding PJSC and to develop solutions for settlement, with subsequent notification of the Committee for Ethics and Discipline/ Ethics and Discipline Commission of the decision taken.

The sole acknowledgement procedure of the existence or absence of a Conflict of Interest by the General Director of SIBUR LLC/Company may only be applied if one or more of the following grounds exist:

- A conflict of interest requires an immediate response due to the need to prevent harm to SIBUR LLC or SIBUR Holding PJSC companies.
- There is a risk of destroying evidence of a Conflict of Interest or otherwise interfering with preliminary due diligence on the Conflict of Interest.

At the initiative of the General Director of SIBUR LLC/Company, the issue of reviewing and making recommendations to resolve a Conflict of Interest may be referred to the Committee for Ethics and Discipline /Ethics and Discipline Commission for review.

#### **4. Committee for Ethics and Discipline of SIBUR LLC. Ethics and Discipline Commissions of SIBUR Holding PJSC companies.**

4.1 The Committee for Ethics and Discipline of SIBUR LLC shall act on the basis of the Committee Regulations. The Ethics and Discipline Commission of a company shall act on the basis of the Commission Regulations.

4.2 The Committee's responsibilities include, inter alia, acknowledgment whether or not there is a Conflict of Interest and making recommendations for the resolution of Conflicts of Interest:

- employees of SIBUR LLC;
- employees of SIBUR Holding PJSC companies who are assigned grade 20 or higher;
- other employees of SIBUR Group companies in cases stipulated herein and in local regulations.

4.3 The matters referred to in clause 4.2 shall be handled by Compliance, Economic Security and Human Resources.

4.4 A joint opinion with a draft decision on a conflict of interest situation prepared by the Compliance, Economic Security and HR departments shall be submitted to the Chairman of the Committee for Ethics and Discipline for approval.

4.5 The Committee Chairman shall approve the solution proposed by the Compliance, Economic Security and Human Resources Department or submit the situation to the Committee for Ethics and Discipline of SIBUR LLC or refer it to the Ethics and Discipline Commission of the Company (in relation to the employee of the Company) for review

4.6 The Commission for Ethics and Discipline of a Company shall be responsible for reviewing Conflicts of Interest arising for Employees of SIBUR Holding PJSC's companies who are assigned grade 19 inclusive. The Commission may seek advice from the Committee when handling Conflict of Interest situations.

4.7 Potential conflicts of interest relating to the subordination of close relatives to one another shall be managed as follows:

- situations related to the subordination of close relatives who are employees at the level of General Director of the company shall be reviewed by the Committee for Ethics and Discipline of SIBUR LLC;
- situations related to the subordination of close relatives who are employees at the level of the Company Director shall be reviewed by the Commission of the Company; the decision of the Commission shall be submitted for approval to the Chairman of the Committee of SIBUR LLC or, upon the decision of the Chairman, for approval to the Committee of SIBUR LLC;
- situations related to the subordination of all other employees shall be reviewed by the Ethics and Disciplinary Commission of the company or by the Committee for Ethics and Discipline of SIBUR LLC according to the general procedure depending on the grade assigned to the relative holding an executive position.

4.8 Preliminary checks on Conflicts of Interest will be conducted by the Economic Security Function in conjunction with the Compliance Function. If necessary, employees from other Functional Areas may be involved in carrying out checks.

4.9 Where the Compliance and Economic Security Team unanimously agree that there is no Conflict of Interest in a situation, an opinion will be sent to the Employee. The conclusions sent shall be communicated to the Committee/Commission members on a quarterly basis.

4.10 If there is no common position of the Compliance and Economic Security Department regarding the assessment of the situation and for choosing the most appropriate form of settling the given Conflict of Interest, the matter together with the findings of preliminary checks shall be submitted to the Committee for Ethics and Discipline of SIBUR LLC or the Ethics and Discipline Commission of the Company for review. Based on the results of the review, the Committee for Ethics and Discipline of SIBUR LLC or the Ethics and Discipline Commission of the Company shall take decisions within their competence.

4.11 Employees shall assist in the conduct of checks and shall provide any information requested as part of the review of Conflict of Interest situations.

## 5. Preventing Conflict of Interest

5.1 In order to avoid conflicts of interest, appointments of Employees who are close relatives of their immediate superior or subordinate shall be avoided when making personnel decisions. Situations where close relatives work in each other's subordination or an Employee participates in the hiring procedure or in solving other personnel issues concerning any close relative employed at SIBUR LLC and SIBUR Holding PJSC companies shall not be allowed.

5.2 No Employee shall be a governmental employee of a governmental authority or governmental organization that performs control, supervisory or regulatory functions with respect to SIBUR LLC and SIBUR Holding PJSC companies. For the purposes of this Policy, "governmental authorities and governmental organizations" shall mean federal governmental authorities and governmental bodies of constituent entities of the Russian Federation (including ministries, services, and agencies), government agencies and their subdivisions.

5.3 Human Resources, Compliance, Economic Security, subject to ensuring compliance with applicable law, when considering candidates for employment as well as in the implementation of regular Conflict of Interest disclosure activities shall:

- request candidates to provide information about their employment with third-party companies during their employment with SIBUR LLC and SIBUR Holding PJSC's companies;
- request candidates to provide information about the ownership of shares (stakes) and other securities in third party businesses;
- request candidates to provide information about employment places of their close relatives.

5.4 Employees may not offer, give or accept any incentives or any Gifts, remuneration, loans, guarantees, sureties, material assistance if this may cause a Conflict of Interest in the performance of their duties or if such actions violate the law, are contrary to the usual business practice, constitute a hidden reward and/or may do damage the business reputation of SIBUR LLC or SIBUR Holding PJSC companies, if disclosed.

5.5 If an Employee receives any Gift with a value exceeding 3,000 rubles, or Gifts which have the characteristics listed in clause 5.4. of this Policy, the Employees must inform thereof by sending a message to the following address: [compliance@sibur.ru](mailto:compliance@sibur.ru).

5.6 The Compliance Department may, subject to the criteria listed in clause 5.4 of this Policy, approve the receipt of the Gift or offer to return the Gift to the Giver as contrary to the corporate rules. The Compliance Department may refer the issue to the Committee for Ethics and Discipline of SIBUR LLC/Ethics and Discipline Commission of a SIBUR Group company.

5.7 Employees shall not tolerate situations or actions that could lead to a Conflict of Interest, such as:

- competition with SIBUR LLC and SIBUR Holding PJSC companies, including, without limitation, competition for any transactions and investment projects, use, in the personal interests or the interests of a third party, information that the Employee became aware of in connection with employment with SIBUR LLC or



SIBUR Holding PJSC companies, or use assets, property and/or information of the said companies;

- personal participation as another party or as an agent/consultant/representative of another party (including on the basis of an employment contract) in order to obtain a profit or other personal benefit in a transaction in which SIBUR LLC and/or SIBUR Holding PJSC companies are a party, if such participation has not been previously approved in writing by the Committee for Ethics and Discipline/Ethics and Discipline Commission of SIBUR Group companies;
- disclosure of confidential information of SIBUR LLC and SIBUR Holding PJSC companies to third parties, in their own interests or in the interests of third parties;
- participation in any commercial and business activities outside the scope of employment at SIBUR LLC or SIBUR Holding PJSC companies, which entails non-compliance by the Employee with his/her employment duties, including non-compliance with the internal employment regulations, which results in the use of assets and resources of SIBUR LLC or SIBUR Holding PJSC companies to the benefit of a third party employer, information the rights to which belong to SIBUR LLC or SIBUR Holding PJSC companies, obtained during the employment at SIBUR LLC or SIBUR Holding PJSC companies.
- failure to report, in due course, any situation and/or conflict of interest of which an employee of SIBUR LLC and/or SIBUR Holding PJSC is aware

5.8 Employees who have reason to believe that this Policy has been breached by other Employees, or that there is a potential risk of such a breach by other Employees, shall immediately report the matter to: [compliance@sibur.ru](mailto:compliance@sibur.ru).

## **6. Final provisions**

6.1 The Human Resources function shall ensure that the Statement of Awareness and Compliance is signed and retained within the employment relationship with individuals. The signed forms of the Statement shall be kept in the Employee's personnel file.

6.2 The Employee's Employment Agreement shall contain a clause prohibiting the concealment and misuse of Conflicts of Interest in accordance with the requirements of this Policy.

## Appendix 1

## Terms, definitions and abbreviations

Corporate dictionary terms

Term	Abbreviation
General Director of LLC SIBUR	
SIBUR Group	
Local regulation	LNA
A SIBUR Holding PJSC company	Company
Employee	
Employer	
Functional area	
Beneficial owner	
Business entity	
Close relatives	
Conflict of interest	
Personal interest	
Employment Agreement	

## Standard Dictionary

Term	Abbreviation	Definition
<i>Terms applicable within the scope of this Standard</i>		
<b>Stakeholders</b>		are groups of individuals or legal entities that have certain expectations regarding the results and activities of SIBUR LLC and SIBUR Holding PJSC companies
<b>Committee for Ethics and Discipline of SIBUR LLC</b>	КОМИТЕТ	a standing collegial advisory body established by a decision of the Management Board of SIBUR LLC and acting in accordance with the Regulations on the Committee for Ethics and Discipline
<b>Ethics and Discipline Commission</b>		a standing collegial advisory body and acting in accordance with the Regulations on the Ethics and Discipline Commission approved by the General Director of the Company.
<b>Counterparty</b>		Any business entity that has business relations with the companies of SIBUR LLC or SIBUR Holding PJSC companies, including a supplier, contractor, subcontractor, client, joint venture partner.
<b>Gift</b>		Any item, thing or service without the corporate logo of SIBUR LLC or SIBUR Holding PJSC, which has any value and which is given, presented, donated or accepted without charge.

**Appendix 2****Circumstances in which a Conflict of Interest may arise**

The following are examples of situations that lead or could lead to a Conflict of Interest, in particular:

- The Employee has an employment relationship with an external Business Entity that is, or seeks to become, a Counterparty or a competitor of SIBUR LLC or SIBUR Holding PJSC companies;
- The Employee engages in entrepreneurial and other income-generating activities not related to the performance of his/her employment duties during working hours;
- The Employee is a member of a management body, committee or commission of a business entity which is or seeks to become a counterparty or competitor of SIBUR LLC or SIBUR Holding PJSC companies, unless such information is disclosed in the public reports of such business entity;
- The Employee owns shares ("equity interests") or other securities of a Business Entity which is, or seeks to become, a Counterparty or competitor of SIBUR LLC or SIBUR Holding PJSC companies, or is a Beneficial Owner of such Business Entity. For Business Entities whose shares are publicly traded, the employee's share (direct or indirect) must exceed 1% of the shares (or 1% of the borrowed capital in case of acquisition of debt securities);
- The Employee receives a loan, guarantee, surety for personal obligations, material assistance, gift, remuneration or other personal benefit from the Business Entity (its employee, agent, consultant, representative) that is, or seeks to become, a Counterparty (excluding credit institutions) of SIBUR LLC or SIBUR Holding PJSC companies;
- The Employee's close relatives are members of management bodies, committees, commissions, own shares (equity interests) or other securities, are Beneficial Owners, or have any other personal material interest in a Business Entity which is a counterparty or competitor of SIBUR LLC or SIBUR Holding PJSC companies. For Business Entities whose shares are publicly traded, the share (direct or indirect) of a close relative of an employee must exceed 1% of the shares (or 1% of the borrowed capital in case of the acquisition of debt securities);
- The Employee's close relatives receive a loan, guarantee, surety for personal obligations, material assistance, valuable gift, remuneration or other personal benefit from the Business Entity (its employee, agent, consultant, representative) that is, or seeks to become, a Counterparty (except for credit institutions) or a competitor of SIBUR LLC or SIBUR Holding PJSC companies;
- The Employee participates in the hiring, supervision, management and career planning of any close relative or in audit discussions and personnel matters relating to any relative employed at SIBUR LLC or SIBUR Holding PJSC companies

- The Employee intends to perform or already performs work under a paid civil or other contract with a Contractor of SIBUR LLC or SIBUR Holding PJSC companies without notifying his/her direct supervisor or without informing compliance@sibur.ru.
- The Employee abuses his or her authority in a way that embarrasses a subordinate or other employee, violates his or her dignity and systematically violates personal boundaries.
- The Employee discloses the information that has become known to him/her in the performance of his/her job duties to a Counterparty or a Competitor of SIBUR LLC or SIBUR Holding PJSC companies.
- The Employee abuses the material benefits provided by the Company (personal use of taxis, fraudulent use of business trip documents).