

APPROVED

by the Resolution of the Board of
Directors

of PAO NOVATEK

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**ANTI-CORRUPTION POLICY
OF PAO NOVATEK**

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INTRODUCTION

NOVATEK is convinced that one of the most important prerequisites for a sustainable business development is strict compliance with the international and applicable national laws against corruption.

NOVATEK hereby declares that it completely rejects dishonest and unlawful methods of conducting business and voluntarily assumes additional anti-corruption obligations recommended by Russian and international bodies and organizations.

The Policy discloses goals and objectives of NOVATEK related to countering involvement in corruption activities, determines legal guidelines and key principles of such countering, describes measures taken by NOVATEK in order to prevent corruption, establishes responsibilities of the Employees and other persons concerning countering corruption, as well as the liability for non-fulfillment (improper fulfillment) of the Policy's provisions.

1. GENERAL PROVISIONS

1.1. Policy Goals

The Policy has been developed to:

- ensure compliance of NOVATEK's activities with high ethical standards of business and the requirements of international and applicable national laws against corruption;
- minimize the risks of NOVATEK and its Employees being involved in corruption activities;
- consistently promote the image of NOVATEK renouncing corruption in all its forms among the Employees, shareholders, investors, counterparties, government and municipal authorities, and other stakeholders;
- establish the local regulatory framework for governing NOVATEK's activities on preventing involvement in corruption.

1.2. Policy Objectives

Objectives of the Policy include the following:

- implementing anti-corruption procedures in NOVATEK based on international and applicable national laws against corruption, and communicate the procedures to Employees and other stakeholders;
- establishing that Employees and PAO NOVATEK's non-employee members of governance bodies are to comply with the principles, restrictions, and requirements stipulated by the Policy;
- establishing information channels to communicate any facts of corruption;
- explaining anti-corruption measures adopted by NOVATEK.

1.3. Scope of application

The Policy applies to the activities of NOVATEK and is compulsory for all Employees, including the Top Management, as well as the Board of Directors.

NOVATEK's counterparties must comply with the requirements of the Policy and ensure compliance with the requirements of the Policy by their employees when such obligations are stipulated in the contracts with NOVATEK or directly required by the applicable national law against corruption.

1.4. Validity period and amendments

The Policy is a standing local regulatory document.

The Policy shall be approved by the Board of Directors.

PAO NOVATEK shall assess the Policy in relation to its compliance with the applicable legislation on a regular basis, but, in any case, at least once every two years.

1.5. Divisions in charge

Standalone structural divisions of PAO NOVATEK in charge of implementation of the Policy's provisions in the Company shall be determined by order of Chairman of the Management Board. Standalone structural divisions and officials of PAO NOVATEK's subsidiaries and affiliates in charge of implementation of the Policy's provisions shall be determined by order of their sole executive body.

Deputy Chairman of PAO NOVATEK's Management Board in charge of economic security shall take measures to keep the Policy updated.

Chairman of PAO NOVATEK's Management Board shall control the fulfillment of the Policy's requirements.

2. LEGAL AND PROCEDURAL FRAMEWORK

The Policy was developed with consideration for the requirements of the following Russian and international legal acts.

2.1. Russian law

Russian anti-corruption law includes the following statutes:

- Constitution of the Russian Federation (adopted by a nationwide vote on December 12, 1993, with amendments approved by all-Russian vote on July 1, 2020).
- Federal law On Combating Corruption No. 273-FZ, dated December 25, 2008
- Criminal Code of the Russian Federation No. 63-FZ, dated June 13, 1996
- Code of Administrative Offences of the Russian Federation No. 195-FZ, dated December 30, 2001

In the Russian Federation criminal and administrative liability is prescribed for committing the following actions:

- giving a bribe;
- promising or offering to mediate in bribery-related negotiations;
- mediation in bribery;
- abuse of authority;
- fraud committed with the use of official position;
- embezzlement committed with the use of official position;
- commercial bribery;
- mediation in commercial bribery;
- promising or offering to mediate in commercial bribery-related negotiations;
- minor commercial bribery;
- unlawful remuneration on behalf of a legal entity.

2.2. International law

International legal instruments which govern anti-corruption matters:

- The United Nations Convention against Corruption (adopted on October 31, 2003; ratified by the Russian Federation on March 6, 2006);
- The Organization for Economic Cooperation and Development (OECD) Convention on Combating the Bribery of Foreign Public Officials in International Business Transactions (adopted on November 21, 1997; ratified by the Russian Federation on February 1, 2012).

Main requirements of the documents in so far as they apply to commercial organizations are as follows:

- prohibition of giving a bribe or items of commercial bribery;
- prohibition on bribing foreign public officials;
- prohibition of receipt of a bribe or items of commercial bribery.

2.3. Methodological framework

In the course of the Policy drafting the recommendations of Russian, foreign, and international bodies and organizations concerning countering corruption were considered:

- Ministry of Labor and Social Protection of the Russian Federation, Guidelines for the Formulation and Deployment by Organizations of Measures to Prevent and Combat Corruption (published on November 8, 2013; approved during the Russian Federation Presidential Council Presidium's meeting on Combating Corruption on April 8, 2014);
- Measures to prevent corruption in legal entities, as approved by the Ministry of Labor and Social Protection of the Russian Federation (published on September 19, 2019);

- Recommendations of the Ministry of Labor and Social Protection of the Russian Federation on the procedure for assessing corruption risks in organizations (published on September 19, 2019);
- Methodological guidelines for credit institutions and non-bank financial institutions on compliance with requirements for identifying and with foreign politically-exposed persons, international organizations politically-exposed persons and Russian politically-exposed persons, and doing business with such persons (approved by the Bank of Russia on June 27, 2017, No. 13-MP);
- Methodological guidelines for identifying foreign politically-exposed persons, international organizations politically-exposed persons, as well as Russian politically-exposed persons, as part of KYC, onboarding, and risk management processes when engaging with such persons (Information Letter of the Russian Federal Service for Financial Monitoring No. 53 dated December 12, 2017);
- International Chamber of Commerce Rules on Combating Corruption (as amended in 2011).

3. TERMS AND DEFINITIONS

For the purposes of this Policy, the term “corruption” shall have the meaning given in Federal Law On Countering Corruption No. 273-FZ dated December 25, 2008. For the purposes of this Policy, the terms “giving of a bribe”, “abuse of authority”, “commercial bribery”, “minor commercial bribery”, “minor bribery”, “fraud committed with the use of official position”, “receiving a bribe”, “mediation in bribery”, “embezzlement” shall have the meaning given in the Criminal Code of the Russian Federation. For the purposes of this Policy the term “unlawful remuneration on behalf of a legal entity” shall have the meaning given in the Code of Administrative Offences of the Russian Federation. For the purposes of this Policy, the terms “politically-exposed person”, “foreign politically-exposed person”, “international organization politically-exposed persons” shall have the meaning given in the United Nations Convention against Corruption, taking into account the Methodological Recommendations of the Bank of Russia and the Federal Service for Financial Monitoring of the Russian Federation. For the purposes of this Policy, the term “foreign politically-exposed person” shall be used in the meaning given in OECD Convention on Combating the Bribery of Foreign Public Officials in International Business Transactions taking into account the Methodological Recommendations of the Bank of Russia and the Federal Service for Financial Monitoring of the Russian Federation.

The Policy contains the following terms and their respective definitions:

3.1. **Anti-corruption clause** means a supplement to a NOVATEK’s contract or agreement or a section thereof, which stipulates that the parties involved agree to deter corruption while performing mutual obligations and establish consequences of

breaching such an arrangement; Model Anti-corruption clause shall be approved by NOVATEK's order.

3.2. Affiliated persons – members of the Employee's family (spouse, minor children and children of majority age (including adoptees and those for whom the Employee or the Employee's spouse is the caregiver or the guardian), parents (adoptive parents) of the Employee and of the Employee's spouse, as well as any other persons dependent on the Employee or the Employee's spouse), relatives and friends of the Employee, as well as entities where the said physical persons are founders, participants/shareholders (holding more than 10% of shares/equity stakes), hold positions of a member of the board of directors, a member of a collective executive body, the sole executive body or deputy to it, the chief accountant, a sales officer (manager). For the purposes of the Policy, the term "Employee's friends" shall mean people, who are acquaintances, but not relatives of the Employee, with whom he has personal relations based on mutual interests or affection.

3.3. Security hotline – system for collecting and processing data (information), which was designed to enable individuals and entities to tell about facts of theft and wasteful spending in NOVATEK, fraud, bribery, corrupt business practices, conflicts of interests and other manifestations of corruption and violations of the Policy.

3.4. Public officials– individuals with the status of public officials under the applicable national law.

3.5. Due diligence means a principle based on terms of reasonable manner and good faith, in accordance with which in the course of performance of economic operations or taking managerial decisions it is necessary to consider the data sufficient for formation of reasonable opinion concerning presence of signs of a counterpart's or job applicant's unconscientiousness.

3.6. Prohibition of giving a bribe (item of commercial bribery) means prohibition to submit, offer or promise to submit any benefit in property or otherwise, directly or through an intermediary, with the aim of affecting a decision of another person in favor of itself or in favor of any third person or organization. Applicable to commercial and non-profit organizations, their employees and non-employee members of their governance bodies, as well as to foreign and Russian public officials, foreign and Russian politically exposed persons, international organizations' politically exposed persons.

3.7. Prohibition of receipt of a bribe (item of commercial bribery) means prohibition to receive, accept an offer to receive any benefit in property or otherwise, directly or through an intermediary, for any action or inaction within the job responsibilities in favor of the bribe giver or third parties.

3.8. Conflict of interests – a situation where the personal interest (direct or indirect) of an Employee has or may have an effect on the due performance by that employee of their job duties, and where the Employee's personal interest comes or may

come into conflict with the rights and lawful interests of NOVATEK, thereby resulting in harm to the rights and lawful interests of other individuals, organizations, NOVATEK or the state.

3.9. **Corruption risk** – possibility of a corruption offence being committed by an Employee or any other person acting on behalf or for the benefit of NOVATEK.

3.10. **Employee's personal interest** – an Employee's interest that involves the opportunity for the Employee to acquire, while performing his/her official job duties, profit in the form of cash, valuables, other property, services of a material value, or the conferral of other proprietary rights for themselves or third parties or the desire of the employee to gain non-property benefits due to various motives, such as careerism, protectionism, nepotism, desire to conceal one's incompetence, avoid disciplinary responsibility for violations and mistakes made in the course of work, receive support from important persons, etc.

3.11. **NOVATEK** – Joint-Stock Company “NOVATEK”, as well as its subsidiaries and affiliates, irrespective of their location, comprising a group of companies, in which PAO “NOVATEK” is the parent company determining the overall development strategy.

3.12. **Promise or offer to give or to accept an unlawful remuneration**– willful creation of conditions for committing corresponding corruption offences when the intent expressed by a person to give or receive a bribe or item of commercial bribery was aimed at communicating it to other persons with the purpose of giving them valuables or receiving valuables from them, as well as in the event of an agreement reached between such persons.

3.13. **Gift**– any type of proposed payments, remunerations, presents, benefits, material valuables or other property, as well as other advantages which are not expressed as specific material benefits, which are given free of charge.

3.14. **Policy** – the present Anti-Corruption Policy of PAO “NOVATEK”.

3.15. **Employees** – individuals being in the labor relations with NOVATEK.

3.16. **Managers** mean employees holding positions in the “executive” category.

3.17. **Top Management** – the Chairman of the Management Board of JSC NOVATEK and the Deputy Chairmen, functional directors, PAO NOVATEK's Chief of Staff.

3.18. **Board of Directors**– NOVATEK's Board of Directors.

4. KEY PRINCIPLES

4.1. Legitimacy

NOVATEK carries out its activities in strict compliance with the applicable Russian anti-corruption legislation and applicable laws of the countries where NOVATEK does business.

During inspection (supervision) activities, including those relating to combatting corruption, of federal and local authorities, NOVATEK contributes to promoting objectivity and does not obstruct lawful activities of inspection bodies.

4.2. Non-admission of Corruption in Any Forms and Aspects

NOVATEK declares non-admission of corruption in any forms and aspects and establishes prohibition for its Employees, NOVATEK governance bodies' members, and other persons acting on behalf of NOVATEK or in favor thereof, directly or through intermediaries, to participate in corruption actions, including offering, promising, giving, soliciting, and receiving bribes (item of commercial bribery) or making payments for easing administrative, bureaucratic and other formalities in any form, including money, valuables, services or other benefit in property or otherwise, to any persons and from any persons or organizations, including commercial and non-profit organizations, authorities and local government authorities, foreign or Russian public officials, foreign or Russian politically-exposed persons, international organization politically-exposed persons with the aim of receiving benefit by himself/herself, NOVATEK or for the third parties.

Whenever and wherever they are, all of NOVATEK's Employees and members of its governance bodies who are not Employees, irrespective of the position they hold, shall be aware that their behaviour must be in full compliance with restrictions, prohibitions, and requirements of the Policy and the effective laws, and shall not commit any actions that can cast doubt on their integrity and good faith.

NOVATEK participates in collective initiatives to combat and prevent corruption.

4.3. Tone from the Top

The Top Management shall help Employees understand the inadmissibility of corruption, whatever the form and manifestation, and shall lead by example of ethical behavior, of compliance with Russian anti-corruption laws and applicable laws of other countries where NOVATEK does business.

4.4. Business Openness

PAO NOVATEK is a public company. The Policy and main information about NOVATEK's activities, including financial indicators, reports, and other data subject to disclosure are made available to the public on the Internet, including NOVATEK's official website, subject to legislative requirements.

4.5. Corruption Risk Assessment

NOVATEK regularly reveals, analyzes, and assesses using all available information potential external and internal corruption risks attributable to its activities in general or in specific areas.

NOVATEK acknowledges that corruption risks need to be managed irrespective of their probability and impact.

4.6. Efficiency and Adequacy of Anti-Corruption Procedures

NOVATEK develops and implements into its activities the whole set of proper and efficient procedures preventing corruption and being adequate to the risks detected and controls over their fulfillment.

4.7. Due Diligence

Seeking to minimize the risk of involvement in corrupt practices, NOVATEK will conduct a comprehensive evaluation of its counterparties to determine, among other things, their integrity, the existence of internal anti-corruption procedures, and the absence of any conflict of interest. Also, the Company will welcome its counterparties' commitment to the principles defined in this Policy, their willingness to include anti-corruption provisions in their contracts, and their offers to assist during any investigation of non-compliance with mutual agreements.

Some components taken from the comprehensive evaluation will be applied by NOVATEK to the recruitment of new employees and to human resources management in general.

4.8. Involvement of Employees in Countering Corruption

NOVATEK sets the objective of shaping among its employees a personal attitude of zero tolerance towards corruption in any form or manifestation.

To accomplish this, NOVATEK takes every possible step to implement the Policy at all organizational levels, and bring the Policy to the knowledge of all Employees and other stakeholders.

NOVATEK contributes to the improvement of Employees' anti-corruption culture level through their regular training of the Policy knowledge and practical application. NOVATEK also ensures the involvement of its Employees in implementing anti-corruption programs.

4.9. Monitoring, Control, Reporting

NOVATEK controls, verifies, and assesses implemented anti-corruption procedures on a regular basis and reviews and updates them as necessary.

The progress under action plans envisaged by the Policy and NOVATEK's other internal regulations are reported to the Audit Committee of the Board of Directors and disclosed in PAO NOVATEK's sustainability reports on an annual basis.

4.10. Abandonment of Retaliatory Measures and Sanctions

NOVATEK protects the interests of Employees who blow the whistle in good faith, on condition of anonymity or otherwise, on theft, embezzlement, fraud, commercial bribery, giving a bribe, conflict of interests, and other corruption offences in NOVATEK that come to their knowledge, and Employees who refuse to commit such offences or to participate therein as an intermediary.

Disciplinary actions cannot be taken against such Employees on the grounds stated above.

5. CORRUPTION PREVENTION MEASURES

5.1. Restrictions on Presenting/Obtaining Gifts and Hospitality Costs

NOVATEK acknowledges that exchange of business gifts and reasonable hospitality costs form an integral part of doing business and are a common business practice.

Together with the above, this practice bears certain corruption risks because in case of presenting expensive gifts and incurring high hospitality costs reasonable suspicions in pursuing by NOVATEK of its vested interests may appear.

Adhering to principles of legitimacy and openness of the business, NOVATEK established the following requirements for Employees while obtaining, presenting, exchanging gifts, and incurring/performing hospitality costs/operations:

- provisions of Russian anti-corruption law and the respective law of the country where the operation is made shall be complied with in full, as well as regulations of PAO NOVATEK's Code of Business Conduct and Ethics, other local regulatory acts, and executive documents of PAO NOVATEK;
- performance of the operations in question shall be prohibited if they are performed with the view of direct or indirect influence on decisions taken by persons holding state positions, municipal positions, state officials, municipal officials, foreign and Russian politically-exposed persons, international organization politically-exposed persons, officials of the Bank of Russia, representatives of political parties, counterparts, public organizations, and other persons for the benefit of NOVATEK;
- cost of a gift to persons holding state positions, municipal positions, state officials, municipal officials, officials of the Bank of Russia shall not exceed RUB 3,000 (Three Thousand) and the gift shall not relate to performance of the job responsibilities by said persons;
- cost of gifts being obtained or presented (excluding those stated in the previous paragraph) shall not exceed RUB 10,000 (Ten Thousand) and be of a regular nature (no more than four (4) times per calendar year per recipient);
- participation in conferences, workshops, business meetings, significant events (sports, social, cultural, etc.) and other events at the expense of the hosting party shall be prohibited;

- presenting or obtaining of gifts in the form of cash, cashless money funds, securities or their equivalents shall be prohibited.

When receiving a gift with a value in excess of RUB 10,000 (Ten Thousand), the Employee shall use his/her best efforts to refuse to receive such gift. If this is not possible, the Employee shall notify the person in charge of implementing the provisions of the Policy and/or the Security Hotline.

If an Employee is in doubt about whether committing any actions would be lawful, he/she shall seek consultation from a person who is responsible for implementing the provisions of the Policy and/or through the Security Hotline.

5.2. Restrictions on Charity and Sponsorship

An important part of NOVATEK's activities as a socially-oriented entity is its participation in charity and providing sponsorship.

NOVATEK always complies with the applicable law when providing charity support.

Sponsorship is provided by NOVATEK directly, without involving any other entities or persons as intermediaries, and always with consideration.

NOVATEK does not provide any charity or sponsor support to state and municipal bodies, commercial and non-profit organizations, their representatives, or other persons with the direct or indirect aim of receiving benefit for NOVATEK, or if such support may be objectively considered as being oriented towards pursuing benefit.

Information on NOVATEK's charity and sponsorship activities is public and is made available on the official website and/or in sustainability reports and/or through other disclosures.

5.3. Abandonment of Political Participation

NOVATEK does not participate directly or indirectly in political parties, organizations or funds related thereto, and does not provide any financial or other support to influence the decision-making of political, legislative, or regulatory bodies (for lobbying purposes).

Employees shall be entitled to participate in political activities at their absolute discretion as private citizens in their spare time if such participation does not impair interests of NOVATEK and does not create a Conflict of Interests.

5.4. Proper Interaction with Representatives of State and Public Organizations

Interaction of NOVATEK with law enforcement bodies, supervising authorities, other state government bodies, local governments, their representatives, and public organizations and their representatives shall be effected in strict conformance with the applicable legislation.

NOVATEK does not make any unlawful payments (including facilitation payments) in favor of foreign and Russian politically-exposed persons, international organization politically-exposed persons, state government bodies and local governments, public organizations, their representatives, and other persons, including payments through intermediaries and payment of holiday expenses, travel and other costs, entertainment expenses in order to obtain or keep business advantages.

Labor and civil contracts with former public officials are entered into in strict compliance with Russian legislative requirements.

5.5. Proper Interaction with Counterparts, Intermediaries, Payments to Third Parties

NOVATEK tends to develop business relations with counterparts supporting principles of the Policy and having their own efficient anti-corruption mechanisms.

While concluding civil contracts, NOVATEK gets its counterparts acquainted with the Policy provisions and suggests to include an Anti-Corruption Clause into the contracts stipulating additional anti-corruption commitments and consequences of committing corruption actions by any party while performing the contract.

NOVATEK abstains from material stimulating of the counterpart's representatives, including stimulating by means of services, payments, gifts with the aim to influence its decision in favor of NOVATEK.

Employees shall not attract intermediaries, agents, and other persons to commit any operations contrary to the requirements of the applicable legislation, the Policy, and other local regulatory documents of NOVATEK.

NOVATEK takes action to comply with legislative requirements related to countering laundering of criminal proceeds, terrorist financing, and financing of proliferation of weapons of mass destruction, in order to minimize the possibility of involvement of NOVATEK and its Employees in this illicit process.

5.6. Accurate Reporting

NOVATEK strictly adheres to the requirements of the applicable legislation and reporting regulations. Each fact of economic activity of the Company shall be subject to recording in a primary accounting document. Distortion or falsification of record-keeping, managerial, and other accounting or evidencing documents is not allowed.

All financial operations shall be accompanied by true and accurate recognition in accounts with the necessary level of detail.

Employees in charge of accounting are held liable for preparation and submission of complete and accurate reports within the established terms.

Deliberate distortion or falsification of accounts, tax and management accounting, and reports is prohibited and is subject to legal prosecution.

5.7. Avoiding Conflict of Interests

NOVATEK takes a set of measures to avoid any conflicts of interests in order to exclude the possibility of obtaining material and/or personal benefit directly or through an intermediary due to rights giving such possibility as a result of use of official position by Employees or their family members, or Affiliated Persons.

In NOVATEK, Conflict of Interests is managed based on the following principles:

- disclosure of information on the Conflict of interests, real or potential, shall be mandatory;
- each case of Conflict Of Interests shall be considered and settled individually;
- Conflicts Of Interests disclosure and settlement processes are confidential;
- when resolving Conflicts of Interests, a balance of interests between NOVATEK and the Employee shall be observed;
- information on Conflicts of Interests is disclosed on a regular basis by completing declarations on Conflict of Interests;
- the Employee is guaranteed protection from prosecution in connection with the reported Conflict of Interests, which was timely disclosed by such Employee and resolved (prevented) by NOVATEK.

To prevent/eliminate a Conflict of Interest Employees shall:

- promptly disclose information on a real or potential Conflict of Interests;
- actively assist in resolving the Conflict of Interests;
- when doing their job, be guided by the principle of the sole priority of NOVATEK's interests and not allow personal interests or that of Affiliated Persons to influence the process of business decision-making in NOVATEK;
- abstain from doing anything for the benefit of NOVATEK's competitors when implementing any business transactions and investment projects or otherwise, not have any proprietary or financial interest in the activities of NOVATEK's competitors;
- refrain from participating in business decision-making and in NOVATEK making transactions where there is their personal interest or an interest of their Affiliated Persons;
- avoid Conflicts of Interests caused by giving/receiving gifts, services or any other benefits.

Relationships related to the Conflict of Interests shall be regulated by independent local acts and executive documents of NOVATEK.

5.8. Inspections and audits

NOVATEK performs, on a regular basis, external and internal audit of financial and economic activities, controls fulfillment by Employees of provisions of the applicable anti-corruption legislation, the Policy, and other local regulatory acts of NOVATEK.

5.9. Security Hotline

In order to maintain high level of confidence in NOVATEK, comply with international business ethics standards, and prevent any fraud and corruption, NOVATEK has a Security Hotline, which is accessible both in Russian and in English.

Hotline contacts are posted on NOVATEK's official website, corporate site, on information boards, and other places available to the public.

NOVATEK guarantees that every applicant who discloses its personal details when using the Security Hotline will remain unknown to any Employees or third parties, except for the Employee who is the focal point and other Employees who have access to such information as part of their job.

NOVATEK shall not be liable for maintaining confidentiality if the applicant voluntarily, through negligence or otherwise, discloses the fact that he/she has used the Security Hotline to other Employees or third parties.

NOVATEK shall reserve the right to disclose the information about reports received through the Security Hotline when so requested by law enforcement authorities, provided that such requests are made in accordance with the effective legislation of the Russian Federation.

For each applicant, NOVATEK provides a possibility of making an anonymous report through the Security Hotline.

NOVATEK ensures that reports can be received through the Security Hotline on a 24/7 basis, including by using voice mail.

NOVATEK guarantees that applicants are protected from prosecution and potential implications associated with the fact that they have used the Security Hotline.

NOVATEK guarantees that Employees using the Security Hotline and/or reporting violations committed by other Employees or any third parties will not be subject to any disciplinary action, including employment termination, demotion, etc., save as provided in effective applicable laws.

NOVATEK shall reserve the right to contact law enforcement authorities to hold applicants liable for knowingly providing false information that discredits, defames or compromises another person, through the Security Hotline.

Any concerned person is also entitled to provide suggestions on ways to improve the Security Hotline framework.

5.10. Determination of Divisions or Officials in Charge of Corruption Prevention

With the view of efficient implementation of the Policy provisions NOVATEK determines divisions and appoints officials in charge of implementation of anti-corruption activities and prevention of corruption offences.

Such decisions shall be executed as separate executive documents of NOVATEK.

5.11. Training and Consulting

NOVATEK ensures training for all members of NOVATEK's governance bodies and all Employees to procure their compliance with the requirements of the Policy, provisions and rules of the anti-corruption legislation, and guarantees unrestricted access to such training for any interested Employees.

Persons who are responsible for implementing anti-corruption activities and preventing corruption offences shall improve their qualification on a continuous basis.

For any questions related to the provisions of the Policy or other anti-corruption activities and procedures, Employees may seek consultation from a person who is responsible for implementing the provisions of the Policy and/or through the Security Hotline.

6. ANTI-CORRUPTION RESPONSIBILITIES OF EMPLOYEES AND OTHER PERSONS

6.1. Employees and members of NOVATEK's governance bodies not being its Employees shall strictly adhere to restrictions and requirements stipulated by the Policy, including those related to presenting and obtaining gifts; incurring hospitality costs; carrying out charity and sponsor activities; participation in political activities; interaction with representatives of state bodies and charity organizations, counterparts, intermediaries, third parties; avoiding conflicts of interests; record keeping.

6.2. Employees and members of NOVATEK's governance bodies not being its Employees shall be forbidden to participate in corruption actions, including offering, promising, giving, soliciting, and receiving bribes (item of commercial bribery) or making payments for easing administrative, bureaucratic, and other formalities in any form, including money, valuables, services or other benefit in property or otherwise, to any persons and from any persons or organizations, including commercial and non-profit organizations, their representatives, state government bodies and local governments, public officials, municipal officials, officials of the Bank of Russia, foreign and Russian politically-exposed persons, international organization politically-exposed persons, with the aim of receiving benefit by himself/herself, NOVATEK or for third parties.

6.3. Employees and members of NOVATEK's governance bodies shall comply with requirements and restrictions of anti-corruption nature stipulated by other local regulatory acts and executive documents of NOVATEK (insofar as they do not conflict with the Policy).

6.4. NOVATEK's Employees shall:

- not participate in corruption actions directly or indirectly, personally or through third party intermediaries, not offer, give, promise, solicit, and receive bribes and payments for ease of formalities in any form, including money funds, valuables, services or any benefit to any persons and from any persons or organizations, including

commercial and non-profit organizations, their representatives, state government bodies and local governments, public officials, municipal officials, officials of the Bank of Russia, foreign and Russian politically-exposed persons, international organization politically-exposed persons;

- abstain from behavior that can be interpreted by the people around as readiness to commit or participate in committing a corruption offence in favor or on behalf of NOVATEK;

- notify promptly an immediate supervisor and person in charge of the Policy compliance of, and/or report to the Security Hotline about:

- any effort to induce an Employee to commit corruption offences;
- any facts of committing corruption offences by other Employees, counterparts of NOVATEK, or other persons, which come to the Employee's knowledge;
- possibility of occurrence or occurred Conflict of Interests involving an Employee.

6.5. Compliance by an Employee with the Policy shall be considered when assessing business proficiency of such Employee, including his/her appointment to a higher position and while settling other HR issues.

7. RESPONSIBILITY FOR NON-FULFILLMENT (IMPROPER FULFILLMENT) OF THE POLICY

7.1. All Employees and members of NOVATEK's governance bodies not being its Employees regardless of the position shall be personally liable for non-fulfillment (improper fulfillment) of the Policy provisions.

7.2. Heads of NOVATEK's independent structural divisions shall be responsible for compliance by their subordinates with the Policy.

7.3. If there are any suspicions of committing corruption actions, an internal investigation shall be conducted and the results of the investigation shall be brought to the attention of the Top Management.

7.4. In relation to a person who committed breach of the Policy provisions, disciplinary penalties may be applied depending upon guiltiness, character, and danger level of the offence committed, amount of incurred or potential damage, including injury to NOVATEK's business reputation, and other substantial circumstances.

7.5. NOVATEK shall reserve the right to file a lawsuit to court seeking for civil penalties in relation to the person who committed breach of the Policy provisions in case of incurring damage to NOVATEK.

7.6. NOVATEK shall reserve the right to apply to law enforcement bodies to hold the person administratively or criminally liable in cases when actions of the person have essential elements of an administrative or criminal offence.

7.7. Employees may be held criminally liable for breach of anti-corruption law by initiative of law enforcement or supervisory bodies.

7.8. Information on committed breaches of the Policy may be disclosed to the public upon the Top Management's decision (subject to compliance with requirements of personal data protection legislation), including the corporate site, PAO NOVATEK's official website, corporate newsletter, and mass media.