

**SUPPLIER CODE OF CONDUCT  
FOR NOVATEK GROUP SUPPLIERS**

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## 1. GENERAL PROVISIONS

1.1. When purchasing goods, works and services, NOVATEK engages with entities across all industries, both domestically and internationally, always upholding high standards of ethics, business transparency and integrity principles, as well as maintaining a strong commitment to sustainable business development.

1.2. Sustainable development is an integral part of NOVATEK's corporate strategy. In its day-to-day operations, NOVATEK treats sustainable development and all its aspects with utmost responsibility. These include occupational health and industrial safety, corporate governance, business ethics, and environmental protection.

1.3. NOVATEK views sustainable development as providing clean and affordable energy to people and industries, generating economic value and opportunities for society through payment of taxes, creating new jobs, offering comprehensive support to local communities where NOVATEK operates, maintaining human rights, mitigating environmental impact, including optimized and improved approaches to environmental protection, as well as maintaining human rights, upholding basic business ethics, combating corruption and protecting the environment in its procurement activities.

## 2. BASIC TERMS AND DEFINITIONS

2.1. **The Code** means the NOVATEK Group's Supplier Code of Conduct.

2.2. **NOVATEK** means NOVATEK, Joint-Stock Company (NOVATEK JSC), as well as companies it controls (to which NOVATEK is a direct or indirect participant), together constituting the NOVATEK Group.

2.3. **Supplier** means any legal entity or individual that supplies goods, performs works or provides services to NOVATEK.

## 3. SUPPLIERS' COMPLIANCE WITH THE CODE

3.1. NOVATEK expects that Suppliers should:

- uphold business transparency and integrity principles, business ethics and sustainable development, as well as the guiding principles of the UN Global Compact, the International Labour Organization, the Declaration on Fundamental Principles and Rights at Work, and applicable environmental protection and industrial safety laws;
- comply with the Code, including adopting and implementing their own supplier code of conduct, incorporating key provisions hereof; and
- ensure the Code is followed by:
  - their respective employees;
  - companies and entities under their control; and

- subcontractors engaged for performance of contracts between Suppliers and NOVATEK.

3.2. NOVATEK encourages Suppliers to communicate the provision of the Code to their counterparties.

#### **4. LABOR RELATIONS**

4.1. NOVATEK adheres to social partnership principles in its employees relations and strives to be a responsible employer not only by following applicable laws, but also through a number of voluntary undertakings in developing, training, and offering social support to, and incentives for, its employees. NOVATEK expects Suppliers to be committed to these principles.

4.2. NOVATEK expects that Suppliers should:

- recognize the freedom of association and promote the exercise of the right to collective bargaining and freedom of speech, not interfere with the employees in exercise of their labor rights, freedoms and legitimate interests and protection thereof in any manner not prohibited by law;
- prevent the use of child and forced labor;
- provide a working environment free of discrimination and harassment; not discriminate against people on the basis of race, skin color, sexual orientation, nationality, disability, religion, political views, trade union membership and other discriminatory grounds in accordance with applicable laws;
- ensure that fair and objective wages, benefits and other employment conditions are provided in accordance with applicable laws;
- ensure safe working conditions that meet regulatory occupational health and safety requirements, including housing conditions (if required by applicable laws); and
- implement measures for improving work conditions, occupational health and safety and reducing professional risks.

#### **5. HUMAN RIGHTS**

5.1. NOVATEK expects Suppliers to adhere to the human rights principles towards their employees as well as any third parties, respect for their honor and dignity, as well as social responsibility towards local communities in the regions of operations.

5.2. NOVATEK expects that Suppliers should:

- comply with the requirements of applicable laws related to labor conditions and the rights of local communities in the regions of operations;

- support the principles set out in the Universal Declaration of Human Rights and the principles of the United Nations Global Compact;
- respect the human dignity and rights of their employees, as well as those of any third parties;
- contribute to economic and social development in the regions of operations, offer comprehensive support to local communities in the regions of operations, and respect their cultural heritage and traditions; and
- keep personal data confidential and follow applicable laws when processing the same.

## **6. ENVIRONMENTAL PROTECTION, OCCUPATIONAL HEALTH AND SAFETY**

6.1. NOVATEK expects that Suppliers should act responsibly in terms of occupational health and safety, environmental protection, and use of natural resources.

6.2. NOVATEK expects that when manufacturing and supplying goods, performing works and services Suppliers should:

- comply with all applicable laws on environmental protection, occupational health, industrial and fire safety; and
- comply with the requirements of contracts with NOVATEK in terms of environmental protection, occupational health, industrial and fire safety.

## **7. COMPLIANCE IN BUSINESS ETHICS**

7.1. NOVATEK expects that Suppliers should uphold business ethics and integrity principles.

7.2. NOVATEK expects that Suppliers should:

- comply with all applicable laws when having contractual relations with NOVATEK;
- prevent any acts of corruption related to criminal profit legalization (money laundering) and adhere to the requirements of the NOVATEK Anti-Corruption Policy and acts of similar or identical nature of its controlled entities;
- avoid actions or omission giving rise to conflicts in business relationships, commit to settle the arising conflicts based on the balance between interests of all participants to business relations;
- prohibit improper use of Confidential Information and prevent its unlawful use; comply with the requirements of contracts and agreements signed with NOVATEK regarding protection of Confidential Information; and

– ensure fair competition in compliance with anti-monopoly and competition laws.

## **8. REVIEW OF INFORMATION ON CODE VIOLATION**

8.1. Any person may report any known facts of the Code violation to NOVATEK at: [ethics@novatek.ru](mailto:ethics@novatek.ru).

8.2. NOVATEK makes sure all received information is considered and appropriate measures are taken, if necessary.