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1. GENERAL PROVISIONS

1.1 Purpose

This *Anti*

- securing continuous

- Federal Law dated December 25, 2008 No. 273-FZ *On Combating Corruption*;

- Federal Law dated August 7, 2001 No. 115-FZ *On the Prevention of the Legalization (Laundering) of the Proceeds of Crime and Financing of Terrorism;*

- Decree of the President of the Russian Federation dated June 29, 2018 No. 378 *On the National Anti-Corruption Plan for 2018-2020*;

- Guidelines of the Ministry of Labor of the Russian Federation dated November 8, 2013 *Methodological Guidelines for the Development and Adoption by Entities of Measures to Prevent and Combat Corruption*; and

- Corporate Governance Code (recommended by Letter No. 06-52/2463 dated April 10, 2014 of the Bank of Russia to be applied by joint stock companies whose securities have been admitted to organized trading).

Foreign anti-corruption laws and international guiur8 neonal gui

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- potential and actual interaction with public officials;
- laws applicable to the industry in which LUKOIL Group operates.

official website (http://www.lukoil.com) in Russian and in English. As and where required, the Policy is translated into the national language of the jurisdiction in which the Group operates.

A decision to translate the Policy into the national language of the jurisdiction in which the Group operates is adopted by the head of the LUKOIL Group entity operating in such jurisdiction.

Employees are necessarily familiarized with local anti-corruption regulations with written acknowledgement upon their employment, election (appointment) to the governing bodies of LUKOIL Group entities and subsequently on a regular basis but at least once every three years, as well as upon appointment to a higher position or any position related to increased corruption risks.

Anti-corruption training of employees is performed at least once a year and is of a regular nature. Such training is based on materials that are updated on a regular basis in the event of amending local anti-corruption regulations or statutory framework.

Training materials may either be of a general nature for all employees of Group entities or reflect special aspects of activities of any employees of Group entities (for example, potential risky situations may differ depending on business processes).

If any employee has doubts or questions in respect of combati.1594.r12 Tf 1 0 0 1 268h 0 0J ETsTf tness

The whistleblowing hotline accepts messages from any interested parties in the languages of the countries of presence of LUKOIL Group entities regarding any aspects of Group's operations meeting the criteria of corruption offenses, irrespective of the level at which they were committed, on a 365/24/7 basis.

The Group maintains confidentiality of the person who has reported information about any actual violations of anti-corruption laws and the established Group's practices in the area of business ethics within limitations imposed by the effective legislation.

Exerting pressure or influence on the person who has reported actual or suspected violations in good faith is prohibited (except where knowingly false information is reported).

3.7 Response to violations

Employees are personally responsible for violating the Policy and anti-corruption laws. In addition, immediate superiors bear personal responsibility for compliance by their subordinates of this Policy, the *Code of Business Conduct and Ethics of Public Joint Stock Company "Oil company "LUKOIL"* and anti-corruption procedures.

Employees in breach of the established standards and principles of combating and preventing corrupt practices may be brought to disciplinary, administrative or criminal liability pursuant to the effective legislation.

Each violation of anti-corruption provisions shall be thoroughly investigated and analyzed in the manner set forth by the Group's procedures and pursuant to applicable laws.

A standard period of preliminary internal investigation after reporting a potential corruption offense shall not exceed one month. During the investigation, the causes and possibilities of committing a corruption offense are established in order to further improve anti-corruption measures.

The Group maintains a register of corruption offenses storing information about the method of identifying any such offense, investigation conducted, punitive measures and investigation results (including the identified cause of committing an offense). The period of retaining materials regarding investigations matches the period of storing documents set forth by local regulations.

The Group collaborates with law enforcement agencies and governmental authorities in identifying and investigating corruption offenses.

4. ANTI-

- filling in the anti-corruption form (or notification in free form), including in respect of conflicts of interest and connections with public officials;

- analyzing and verifying information about a potential counterparty;

- analyzing and verifying documents to confirm the financial standing, assets, headcount and other details requiring verification for the expected collaboration with a potential counterparty; and

- making the anti-corruption and business ethics policy and procedures available for review and receiving a written confirmation that the counterparty has read such documents.

LUKOIL Group exercises control and monitoring of operations an

4.5 Interaction with competitors

LUKOIL Group does not accept any manifestations of bad faith competition and abuse of dominant or monopolistic position. PJSC “LUKOIL” and other Group entities are prohibited from entering into any relations with competitors that may be treated as restricting competition or contradicting the relevant antitrust laws.

It is prohibited to enter into any agreements with competitors and/or other persons, if such agreements result or may result, among others, in:

- establishing or maintaining prices (rates), discounts, markups and/or surcharges;
- increasing, decreasing or maintaining tender prices;
- dividing the commodity market under the territorial principle, volume of selling or purchasing goods;
- decreasing the output or stopping production; and
- denying the conclusion of contracts with certain sellers or purchasers (customers).

Striving for leadership in the global oil and gas sector, having significant advantages in production and sales and playing a major role in its regions of presence, the Group supports and encourages honest, free and fair competition and avoids acts (omissions) that may cause any restriction of competition. The Company demonstrates a respectful attitude towards its competitors and interacts with them pursuant to generally accepted rules of business ethics, while complying with antitrust laws of jurisdictions in which the Group operates.

4.6 Interaction with governmental authorities and public officials

The Group strictly observes effective laws and presents its position during public discussions of draft regulations and other regulatory decisions that may directly or indirectly affect the Group’s business.

The Group does not tolerate any payments or other forms of incentives provided to representatives of governmental authorities and local governments to facilitate formalities.

All employees of the Group entities shall:

- abstain from taking any acts that may be treated as a hint, promise or guarantee of providing any cash funds, property, property rights, services and other financial or non-financial advantages in order to secure or accelerate any standard method of performing statutory procedures and acts that are not covere

- if any governmental authorities or other regulators request information – provide complete and accurate information pursuant to the procedure accepted by the Group within their competence or address such requests to the competent unit;

- contact their immediate superior and/or the competent unit, if they can't evaluate correct course of action during dealings with public officials, governmental authorities, local governments and public organizations; and

- report any violations related to dealings with public officials, governmental authorities, local governments and public organizations to their immediate superior and/or the whistleblowing hotline.

4.7 Financial, tax and managerial