VLADIMIR POTANIN FOUNDATION

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ANTICORRUPTION POLICY

OF THE VLADIMIR POTANIN FOUNDATION

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GENERAL PROVISIONS

The mission of the Vladimir Potanin Foundation (hereinafter, the **Foundation**) is to develop a culture of giving, unite active creative professionals involved in addressing socially significant issues and making sustainable social changes, as well as to offer opportunities for new ideas and create conditions for their implementation.

Effective charitable activity relies upon mutual trust, an impeccable reputation, and strict compliance with the law. The Foundation declares its unconditional rejection of all forms of corruption, fraud, legalization (laundering) of proceeds of crime and terrorist financing. We voluntarily accept the obligations for the prevention of offences as set forth in this Anticorruption Policy.

The basic operating principles of the Foundation are:

1. legality and high quality standards and prohibition of discrimination;

2. zero tolerance towards corruption: the unequivocal rejection of all forms of corruption, fraud, and violations related to legalization (laundering) of proceeds of crime and terrorist financing;

3. working for the public benefit;

4. independence, transparency and accountability;

5. honesty and fairness.

The Foundation's Anticorruption Policy is a set of interrelated principles, procedures and specific measures aimed at preventing and suppressing corruption and violations related to legalization (laundering) of proceeds of crime and terrorist financing within the scope of the Foundation's activities.

This Anticorruption Policy was developed in accordance with the laws of the Russian Federation and subject to guidelines, best practices, as well as, in particular:

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

- The Federal Law No. 115-FZ On Countering Legalization (Laundering) of Proceeds of Crime and Terrorist Financing dated August 7, 2001;

- The Criminal Code of the Russian Federation;

- The Code of Administrative Offenses of the Russian Federation;

- Guidelines of the Federal Financial Monitoring Service (Rosfinmonitoring) for the NGO sector relating to combating terrorist financing;

- Guidelines on the Development and Taking Corporate Actions to Prevent and Combat Corruption, developed by the Ministry of Labor and Social Protection of the Russian Federation (published on November 8, 2013, and approved on April 8, 2014, at the meeting of the Presidential Council of the Russian Federation on Combating Corruption);

- Other regulations of the Russian Federation.

The Anticorruption Policy also takes into account applicable international laws and best practices, and is based on local regulations of the Foundation, including but not limited to, the Principles and Guidelines for Conducting Charitable Activities and Risk Management of the Foundation, the Foundation's Policy on

the Protection of Whistleblowers Reporting on Facts of Corruption and Violations Related to Legalization (Laundering) of Proceeds of Crime and Terrorist Financing.

The Anticorruption Policy establishes a comprehensive approach to countering corruption, legalization (laundering) of proceeds of crime and terrorist financing, sets out the duties of Employees and other persons involved in the Foundation's activities, as well as the liability for non-compliance (improper compliance).

1. TERMS AND DEFINITIONS USED IN THE ANTICORRUPTION POLICY

1.1. **Anticorruption Clause** is the Anticorruption and Russian Laws Compliance Clause, a short and full versions of which are attached to a contract or agreement of the Foundation, or a section in such documents, according to which the parties agree on the prevention of corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing when performing mutual obligations, specify the consequences of the violation of such an agreement.

1.2. **Beneficiary** is an individual or a legal entity receiving funds or other means of support from the Foundation within the framework of realization of charity programs.

1.3. **Close relative** is a spouse, parent, son or daughter, spouses of the children, full and half siblings, uncle, aunt, nephew (niece), cousin, grandchildren, grandmothers, grandfathers, as well as the following relatives on the spouse's part: mother, father, sister, brother, son or daughter.

1.4. **Bribe** is, in accordance with Article 290 of the Criminal Code of the Russian Federation, the taking by an official, a foreign official or an official of a public international organization, in person or through an intermediary, of money, securities or other assets, or unlawful provision of property-related services, granting of other property rights for actions (inaction) in favor of the bribe-giver or persons the bribe-giver represents, if the official takes such acts (inaction) within his/her official powers or, by virtue of his/her official position, may further such actions (inaction), as well as for overall patronage or connivance in the service.

1.5. **Public Official** is any Russian or foreign person appointed or elected to hold (occupy) a position in a legislative, executive, administrative, law enforcement or judicial authority or public international organization; any person exercising a public function for the state, including for a public authority, state corporation, state-owned company, public-law company; leading political figures, officials of political parties, including candidates for political office; ambassadors, heads and employees of public authorities, state corporations, state-owned companies, and public-law companies.

1.6. **Grantee** is an individual or a legal entity receiving free and irrevocable support from the Foundation in forms of funds or in kind for the implementation of projects in areas of activity supported by the Foundation.

1.7. **Due Diligence** is a principle based on the reasonableness and good faith according to which it is necessary to take into account the information sufficient to form a reasonable opinion on whether a Counterparty or an applicant shows signs of bad faith, when performing business transactions or making management decisions.

1.8. **Abuse of Office or Powers** is the use by a Foundation's Staff Member of his/her powers contrary to the legitimate interests of the Foundation and for gaining benefits and advantages for himself/herself or other persons, or infliction of damage on other persons, if such action caused significant damage to the rights and legitimate interests of citizens or organizations or the legally protected public or state interests.

1.9. **Commercial Bribery** is, in accordance with Article 204 of the Criminal Code of the Russian Federation, the illegal transfer to a person, exercising management functions in a for-profit or any other organization, of money, securities, any other assets, provision of any property-related services to such person, granting of any other property rights to such person for any actions

(inaction) for the benefit of the giver in connection with the position held by such person (including where, at the instruction of such person, property is transferred, or property-related services are rendered, or property rights are granted to another individual or legal entity).

1.10. **Ethics Committee** is a permanent special unit of the Foundation, established to maintain high ethical standards and implement the requirements of the Code of Ethics, the Anticorruption Policy, and applicable legislation.

1.11. **Counterparty** is a legal entity or an individual with which the Foundation enters into contractual relations, except for the labor relations.

1.12. **Conflict of Interest** is a situation where personal interest (whether direct or indirect) of a Foundation's employee affects or may affect proper performance by such employee of his/her employment duties and where a conflict arises or may arise between personal interest of a Foundation's employee and rights and legitimate interests of the Foundation, which may cause damage to the rights and legitimate interests, assets and/or goodwill of the Foundation.

1.13. **Corruption** is abuse of office, bribe giving or taking, abuse of powers, commercial bribery or other illegal use by a person of their position contrary to the legitimate public and state interests for gaining benefits in the form of money, valuables, other assets or property-related services, other property rights for himself/herself or third parties, or illegal granting of such benefits to such person by other individuals. Corruption also includes such actions taken on behalf or for the benefit of a legal entity.

1.14. **Legalization (laundering) of proceeds of crime** is, in accordance with Paragraph 3 of Article 3 of the Federal Law No. 115-FZ On Countering Legalization (Laundering) of Proceeds of Crime and Terrorist Financing dated August 7, 2001, giving a legal form to the possession, use or disposal of the funds or other assets obtained as a result of a crime.

1.15. **Whistleblowing Hotline** is a set of organizational measures and technical means that makes it possible to receive from the Foundation's Staff, Counterparties and other third parties reports on facts of corruption within the Foundation and violations committed in the course of the Foundation's business activities, as well as to record and review, analyze and summarize the information received.

1.16. **Personal Interest** is the interest of a Foundation's Staff Member related to the possibility of such Staff to receive income in the form of money, valuables, other assets or property-related services, other property rights for himself/herself or for third parties when performing their duties.

1.17. **Gift** is any valuables in tangible or intangible form, for which there is no obligation to pay, that is, transferred free of charge, including items, stuff, gift certificates for any goods and services, event invitations (for concerts, tours, sports, etc.), money, securities and other assets, benefits and property-related services, including works, services, payment for entertainment, transportation costs, loans, discounts, making property available for use, including housing, etc.

1.18. **Supervisory Board** is a collegial body of the Foundation that oversees the activities of the Foundation, decisions made by other bodies of the Foundation and their implementation, the use of the Foundation's funds and compliance with the laws of the Russian Federation.

1.19. **Mediation in Bribery** – according to Article 291.1 of the Criminal Code of the Russian Federation direct transfer of a bribe on behalf of the bribe giver or bribe-taker or other assistance to the bribe-giver and (or) bribe-taker in reaching or implementing an agreement between them on receiving and giving a bribe to a significant extent.

1.20. **Prevention of corruption** is, in accordance with Clause 2 of Article 1 of the Federal Law No. 273-FZ On Combating Corruption dated December 25, 2008, the actions of federal public authorities, public authorities of the constituent entities of the Russian Federation, local governments, civil institutions, organizations and individuals taken within their powers: a) to prevent corruption,

including identification and further elimination of the causes of corruption (corruption prevention); b) to identify, prevent, suppress, disclose and investigate corruption offenses (combating corruption); c) to minimize and/or eliminate the consequences of corruption offenses.

1.21. **Employees** are the individuals employed by the Foundation.

1.22. **Council for the Endowment Use** is a collegial body of the Foundation formed in accordance with Federal Law No. 275-FZ On the Procedure for Establishment and Use of Endowment by Non-Profit Organizations dated December 30, 2006.

1.23. **Foundation Board** is the supreme collegial body of the Foundation, the main function of which is to ensure that the Foundation meets the goals for which it was established.

1.24. **Report** is any form of communication (whether written, electronic, or oral) submitted to the Foundation through established communication channels by any person regarding facts, indications, or threats of corruption and violations related to legalization (laundering) of proceeds of crime or terrorist financing**,** committed by the Foundation's Employees or other persons in connection with the Foundation's activities, or against such persons.

1.25. **Staff Members** are the Foundation's Employees as defined above, as well as persons that perform work or provide services for the Foundation under civil law contracts entered into therewith, including members of the Foundation Board, Supervisory Board, Council for the Endowment Use, Experts and members of the Expert Councils.

1.26. **Management companies** are established in accordance with the legislation of the Russian Federation legal entities licensed to carry out activities in securities management or related to management of investment funds, mutual funds and non-state pension funds with which the Foundation has concluded agreements on asset management.

1.27. **Terrorist Financing** is, in accordance with Paragraph 4 of Article 3 of the Federal Law No. 115-FZ, On Combating Legalization (Laundering) of Proceeds of Crime and Terrorist Financing dated August 7, 2001, provision or collection of funds or financial services with the knowledge that they are intended to finance the organization, preparation, and commission of at least one crime specified in Articles 205, 205.1, 205.2, 205.3, 205.4, 205.5, 206, 208, 211, 220, 221, 277, 278, 279, 360, and 361 of the Criminal Code of the Russian Federation, or to finance or otherwise provide material support to a person for commission of at least one of the specified crimes, or to support an organized group, illegal armed group, or criminal association (criminal organization) established or to be established in order to commit at least one of the specified crimes.

1.28. **Expert Council** is a collegial body of the Foundation, formed from among experts of specific competition to determine the composition of finalists or winners.

1.29. **Experts** are specialists hired by the Foundation to evaluate competitive applications of potential Beneficiaries, Grantees, conducting research, participating in events held by the Foundation and (or) its partners. Represent a non-profit sector, charity, areas of endowment, fundraising, jurisprudence, social sphere, culture, museums, creative industries, education, and popularization of science, information technology and other areas adjacent to the Foundation's spheres of activity.

1.30. **Code of Ethics** is Principles and Guidelines for Conducting Charitable Activities and Risk Management of the Vladimir Potanin Foundation approved by the General Director of the Foundation subject to changes and amendments made from time to time, which are available on the Foundation's website at http://www.fondpotanin.ru/en.

2. GOALS AND OBJECTIVES OF THE ANTICORRUPTION POLICY

2.1. The basis of the Foundation's professional approach to charitable activities is its reputation and the trust of the Founder, Subscribers, Beneficiaries, Grantees, Counterparties, partners, and professional community in Russia and abroad, the public as a whole.

2.2. The goals of the Anticorruption Policy are as following:

- maintaining the reputation of the Foundation;
- ensuring ethical behavior;
- prevention of corruption and legalization (laundering) of proceeds of crime and terrorist financing;
- formation of anticorruption consciousness among Employees;
- raising openness and transparency of the activities within the scope of the Foundation's Anticorruption Policy.

2.3. The main objectives of the Anticorruption Policy are as following:

2.3.1. establishment of an effective arrangement for preventing corruption and legalization (laundering) of proceeds of crime and terrorist financing and minimizing risks of involvement of the Foundation and the Foundation's Staff in such activities;

2.3.2. nurturing legal and civic awareness and anticorruption education of the Foundation's Staff Members by forming a negative attitude to corruption, other violations among the Staff Members, as well as anticorruption education;

2.3.3. minimization of property and reputational damage of the Foundation by preventing corrupt practices and violations related to the legalization (laundering) of proceeds of crime and terrorist financing, as well as punishment therefor;

2.3.4. establishment of the operating principles for the prevention of corruption and violations related to legalization (laundering) of proceeds of crime and terrorist financing;

2.3.5. methodological support for the development and implementation of anticorruption measures through the adoption of internal regulations of the Foundation regarding combating corruption;

2.3.6. engagement of Foundation's Staff Member in the implementation of measures to prevent corruption and other violations specified in the local regulations of the Foundation, and development of anticorruption awareness among the Foundation's Staff Members;

2.3.7. prevention of corruption and other violations related to legalization (laundering) of proceeds of crime and terrorist financing, ensuring responsibility and the compensation for the damage;

2.3.8. implementation of a set of legal, organizational, and informational measures aimed at preventing illegal conduct by the Foundation's Staff Members, including inter alia, for the purposes of preventing and resolving the conflict of interest; preventing conduct by Employees that could be perceived by others as participation or inducement to commit corruption; as well as monitoring compliance with ethical conduct requirements and the prevention of corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing.

3. KEY ANTICORRUPTION PRINCIPLES

3.1. The Foundation's anticorruption measures shall be based on the following key principles:

3.1.1. compliance of the Foundation's Anticorruption policy with the laws and generally accepted standards, i.e. compliance of the Foundation's policy and implemented anticorruption

measures with the Constitution of the Russian Federation, laws of the Russian Federation and international treaties of the Russian Federation and other regulations applicable to the Foundation's activities;

3.1.2. personal example of the management, i.e. the key role of the Foundation's management in the building of a corruption intolerance culture and in the creation of an internal system for preventing and countering corruption, intolerance to the violations related to the legalization (laundering) of proceeds of crime and terrorist financing;

3.1.3. staff's involvement, i.e. active participation of the Foundation's Staff in the development and implementation of the anticorruption standards, ensuring continuous awareness raising and training in order to maintain a high level of anticorruption culture and the prevention of corruption, legalization (laundering) proceeds of crime and terrorist financing, their awareness in terms of compliance with the Foundation's Anticorruption Policy, mastering methods and techniques for implementing anticorruption measures in practice;

3.1.4. zero tolerance to the corruption and violations related to legalization (laundering) of proceeds of crime and terrorist financing, i.e. rejection of such violations in any forms and manifestations;

3.1.5. adequacy of the anticorruption procedures as to the corruption risk, i.e. a set of measures making it possible to reduce the likelihood of involvement of the Foundation and its Staff in corrupt practices, shall be developed and implemented subject to existing corruption risks of the Foundation;

3.1.6. effectiveness of the anticorruption procedures, i.e. taking the anticorruption measures that ensure the effectiveness and simplicity of their implementation for prevention of corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing in the future;

3.1.7. responsibility and the unavoidability of punishment, i.e. unavoidability of punishment of the Foundation's Employees, regardless of their role, positions, period of service and other conditions in case of corruption offenses on their part;

3.1.8. continuous control and regular monitoring, i.e. regular monitoring of effectiveness of the implemented anticorruption standards and procedures, as well as control over implementation thereof. Systematic improvement of the proposed measures and standards subject to changes in the conditions of the internal and external environment, including in the laws of the Russian Federation;

3.1.9. due diligence and, in order to minimize the risks of involvement in corrupt practices, comprehensive analysis by the Foundation of the Counterparties' and partners activities, including evaluation of their reliability, checks for conflicts of interest, and verification of their own anticorruption procedures. The Foundation welcomes Counterparties and partners commitments to the values of the Anticorruption Policy, includes an Anticorruption Clause in the contracts and expects assistance in investigating potential violations. Due diligence elements are also mandatory for the Foundation during the selection and recruitment of Employees;

3.1.10. transparency of Foundation's activities, i.e. informing the public of the Foundation's ethical and anticorruption standards by publishing information on the local regulations governing the prevention of corruption on the official website of the Foundation.

4. APPLICATION AND IMPLEMENTATION OF ANTICORRUPTION POLICY

4.1. The Anticorruption Policy is a directly applicable document, the principles and requirements of which shall be strictly observed in all areas of the Foundation's operation, in its program and

administrative activities, in the formation and use of the endowments, in the relations with the Staff members, members of the Supervisory Board, Foundation Board, Council for the Endowment Use, Experts and members of Expert Councils, Beneficiaries, Grantees, Counterparties, partners and other parties involved in Foundation activities.

4.2. The Anticorruption Policy applies to Employees, members of the Supervisory Board, Foundation Board, the Endowment Use Council, Experts and members of Expert Councils, Beneficiaries, Grantees, Counterparties, partners of the Foundation, and other persons involved in the Foundation's activities. In confirmation thereof, the aforementioned persons undertake commitments to comply with the Principles and Guidelines for Conducting Charitable Activities and Risk Management, and the Anticorruption Policy of the Foundation.

4.3. Anticorruption Measures within the Foundation, in accordance with the Federal Law No. 273-FZ On Countering Corruption dated December 25, 2008, shall include:

- designation of business units or Employees in charge with preventing corruption and other offenses (The Ethics Committee);
- development of standards and procedures aimed at ensuring fair business practices in the Foundation;
- adoption of a code of business conduct in the Foundation;
- avoidance and settlement of conflicts of interest of the Foundation's Staff;
- cooperation of the Foundation with law enforcement authorities;
- prevention of informal reporting and using of the forged documents.

4.4. In order to maintain high ethical standards in the Foundation's work, minimize the risks of unethical conduct, and counter corruption and non-compliance, including violations relating to legalization (laundering) proceeds of crime and terrorist financing, a permanent special unit – the Ethics Committee – has been established within the Foundation.

4.5. The procedure for the formation, proceedings and powers of the Ethics Committee shall be determined by the Ethics Committee Regulation approved by the decision of the General Director of the Foundation.

4.6. The Foundation shall work on prevention of the Corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing in accordance with the annually approved Action Plan for the preventing and combating such violations in the Foundation (hereinafter, the **Action Plan**).

4.7. The Action Plan shall include measures aimed at achieving specific results in terms of preventing corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing, minimizing such risks and/or remedying their consequences.

4.8. The Ethics Committee shall prepare and review quarterly reports on the implementation of the Action Plan in order to monitor its implementation in the Foundation.

5. STANDARDS OF CONDUCT AND RESPONSIBILITIES OF STAFF RELATED TO PREVENTION OF CORRUPTION

5.1. The Foundation's Code of Ethics establishes general rules and principles of conduct for Employees in matters of business ethics and serves to promote ethical, fair, and conscientious behavior across both Employees and the Foundation as a whole.

5.2. In the line of the anticorruption standards of conduct and in order to prevent corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing, the Foundation's Staff Members shall:

5.2.1. be guided by the Anticorruption Policy and strictly comply with its principles and requirements;

5.2.2. refrain from committing, permitting, or participating in any acts of corruption or violations related to legalization (laundering) of proceeds of crime and terrorist financing whether personally or through the involvement of counterparties, intermediaries, or other third parties;

5.2.3. refrain from conduct that may be construed by the others as a willingness to commit or be involved in the commission of a corruption or other offense whether for personal benefit or on behalf of the Foundation;

5.2.4. refrain from abusing their office for personal purposes, including from receiving gifts, remuneration and other benefits whether for themselves or other persons;

5.2.5. refrain from engaging Counterparties, intermediaries or other persons to commit acts that violate anticorruption laws, the Anticorruption Policy, as well as other local regulations of the Foundation;

5.2.6. immediately report to the Foundation / Foundation's Ethics Committee:

- the occurrence of any actual or potential conflict of interest or personal interest, in accordance with the procedure set forth in the Foundation's Code of Ethics;
- any attempts to induce the commission of corruption, fraud, violations related to legalization (laundering) proceeds of crime and terrorist financing, and (or) any known facts of such offences committed by or against other Employees, Counterparties of the Foundation, or other persons involved in the Foundation's activities;
- upon identifying any fact or reasonable suspicion of corruption or fraud on the part of another Employee of the Foundation, a Counterparty, or other person;
- in the event of any doubts regarding the lawfulness or ethical nature of their own actions.

6. IDENTIFICATION AND RESOLUTION OF CONFLICT OF INTEREST

6.1. The Foundation's Staff Members shall be obliged to prevent situations where their personal interest influences or may influence the proper, objective, and impartial performance of their employment or other duties (conflict of interest).

6.2. Any real or potential conflict of interest shall be promptly reported to the Foundation.

6.3. The procedure for identifying and resolving the conflict of interest is established by the Principles and Guidelines for Conducting Charitable Activities and Risk Management of the Foundation.

7. BUSINESS GIFTS AND HOSPITALITY EXCHANGE RULES

7.1. The Foundation maintains a corporate culture that considers business gifts and corporate hospitality solely as tools for maintaining business relations and as a manifestation of commonplace courtesy.

7.2. In order to prevent corruption and undue influence on the activities of the Foundation and its Staff Members, and to minimize reputational risks The Principles and Guidelines for Conducting Charitable Activities and Risk Management of the Foundation establishes the uniform rules for the exchange of business gifts and corporate hospitality.

8. PREVENTION OF CORRUPTION

8.1. The prevention of corruption and violations related to legalization (laundering) of proceeds of crime and terrorist financing within the Foundation consists in deterrence, including the timely identification and subsequent elimination of the causes and conditions enabling the commission of corruption and other offences.

8.2. In order to prevent the corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing, the Foundation shall:

8.2.1. implement a uniform anticorruption policy of the Foundation, develop intolerance among the Foundation's Staff to the corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing;

8.2.2. extend the Foundation's anticorruption rules within the framework of ongoing charitable programs and competitions to applicants, Beneficiaries, and Grantees by means of:

- the provision of anticorruption warranties by applicants at the stage of submitting applications to participate in competitions;
- the inclusion of mandatory conditions (clauses) regarding compliance with the Foundation's anticorruption standards in grant agreements with Grantees and Beneficiaries.

8.2.3. interaction with public authorities, governmental and commercial organizations, civic institutions in terms of combating the corruption and other violations related to the legalization (laundering) of proceeds of crime and terrorist financing;

8.2.4. adoption of standards of conduct aimed at ensuring the active participation of Employees in countering corruption, violations related to the legalization (laundering) of proceeds of crime and terrorist financing;

8.2.5. improve the Foundation's internal control system, evaluate on a regular basis the performance in terms of combating the corruption and other violations of the Anticorruption Policy and other local regulations of the Foundation;

8.2.6. control application of reporting standards of the Foundation in accordance with applicable legislation and best practices;

8.2.7. ensure transparency, integrity and objectivity in the financial and business activities of the Foundation and in the interaction with the Counterparties and other persons with which the Foundation cooperates;

8.2.8. ensure the independence and confidentiality in examination of application, compliance of Experts with Foundation's anticorruption regulations;

8.2.9. ensuring due diligence in cooperation with Counterparties;

8.2.10. raising awareness of the Staff Members by ensuring their formal acknowledgement of the Foundation's internal regulations, governing compliance with anticorruption legislation and conducting systematic training.

9. PREVENTION OF CORRUPTION IN INTERACTIONS WITH COUNTERPARTIES

9.1. The Foundation shall make reasonable efforts to minimize the risk of establishing business, employment and other relationships with the individuals or legal entities that may be involved in corrupt practices and violations related to the legalization (laundering) of proceeds of crime and terrorist financing, and thus expose the Foundation to the risk of involvement in such practices.

9.2. In order to minimize the risk of the Foundation's involvement in corrupt practices and violations related to the legalization (laundering) of proceeds of crime and terrorist financing, the Foundation has developed and is implementing due diligence procedures complying with applicable legal requirements in respect of all categories of Counterparties and the individuals with whom the Foundation plans to enter into an employment or civil law contract.

9.3. The anticorruption efforts in the interaction with the Counterparties shall be made in the following main areas:

9.3.1. establishment and maintenance of business relations with the Counterparties that carry on business in good faith, take care of their reputation, maintain high ethical standards in the business activities, implement their own measures to combat corruption and violations related to legalization (laundering) of proceeds of crime and terrorist financing, participate in collective anticorruption initiatives;

9.3.2. conducting integrity assessments of counterparties based on the analysis of their public profiles and open-source information, in order to mitigate the risks of the Foundation becoming involved in unethical or fraudulent practices;

9.3.3. inclusion of provisions on anticorruption compliance in the contracts entered into with Counterparties as a standard Anticorruption Clause;

9.3.4. posting of information on the Foundation's local regulations on countering corruption and violations related to legalization (laundering) of proceeds of crime and terrorist financing, on the official website of the Foundation.

10. ANTICORRUPTION EDUCATION OF STAFF

10.1. All Foundation's Staff Members shall be made aware of the Anticorruption Policy, provisions of other local regulations of the Foundation regarding prevention and suppression of corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing, and amendments thereto.

10.2. The anticorruption education of the Staff shall be conducted on a regular basis in order to form an anticorruption outlook and intolerance to the corruption and other violations related to the legalization (laundering) of proceeds of crime and terrorist financing, and raise the legal awareness of the Foundation's Staff, and shall include:

10.2.1. information activities: the prompt dissemination to Employees of statutory requirements, law enforcement practices, and internal regulations in the area of countering corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing;

10.2.2. regular training: the provision of periodic educational activities on countering corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing within the Foundation (seminars, lectures, training sessions, etc.);

10.2.3. individual consultations: the provision of tailored expert assistance and guidance to Employees.

11. RELIABLE REPORTING

11.1. The Foundation ensures strict internal control and regular review of accounting, personnel, and other record-keeping activities for compliance with anticorruption legal requirements.

11.2. In order to ensure the accuracy of financial transactions, the following are strictly prohibited within the Foundation:

- preparation of informal (double) reporting;
- performance of unrecorded or improperly recorded transactions;
- keeping records of nonexisting (fictitious) expenses;
- recording liabilities with incorrect identification of their underlying objects;
- destruction of accounting and other records in violation of the retention periods prescribed by law;
- any other misrepresentation or falsification of accounting data and supporting documents.

11.3. For the purpose of ensuring the designated use of funding, the Foundation shall exercise internal control and monitoring, including, inter alia:

- the clear determination of the objectives and scope of the proposed charitable activities of, as well as the beneficiary group before the launch of the project;
- the assessment of risks associated with corruption, legalization (laundering) of proceeds of crime and terrorist financing, as well as the implementation of measures for the management thereof;
- the preparation of a detailed budget and the maintenance of comprehensive reporting;
- the oversight of the movement of cash, materials, and equipment;
- the execution of all settlements exclusively through the banking system;
- the monitoring of the actual receipt of distributed charitable funds.

11.4. The Foundation's Employees responsible for the maintenance of accounting, management, and other types of records, shall bear personal liability for the timely, complete, and accurate reporting of the Foundation.

12. WHISTLEBLOWING HOTLINE AND REPORTING ON VIOLATIONS

12.1. In order to maintain a high level of confidence in the Foundation's activities, compliance with the ethical standards of conduct, prevention of corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing, the Foundation established a special Whistleblowing Hotline.

12.2. By contacting the Whistleblowing Hotline, Employees, Counterparties, and third parties may report incidents of corruption, violations related to legalization (laundering) of proceeds of crime and terrorist financing, fraud, conflicts of interest, or any other breaches of the Anticorruption Policy. Such notifications may be submitted in any convenient form, including on a strictly anonymous basis. The Foundation guarantees the absolute confidentiality and non-disclosure of the whistleblower's identity.

12.3. The Whistleblowing Hotline is available on the Foundation's website at https://fondpotanin.ru/en/ and by email no_corruption@fondpotanin.ru.

12.4. Reports of incidents of corruption and violations related to legalization (laundering) of proceeds of crime and terrorist financing shall be reviewed by the Ethics Committee within the scope of authority approved by the Regulations on the Ethics Committee.

12.5. Reports of incidents of corruption and violations related to legalization (laundering) of proceeds of crime and terrorist financing shall be subject to mandatory registration and review within 30 (thirty) calendar days from the date of receipt of the report by the Foundation. In exceptional cases requiring additional verification, as well as the request and analysis of materials, the period for resolving the Reports may be extended by the Chairman of the Ethics Committee, but by no more than 30 (thirty) calendar days.

12.6. All Reports of actual or potential violations are subject to immediate investigation by the Ethics Committee. Where necessary and in accordance with applicable law, the materials of the conducted investigation shall be referred to the relevant state authorities for further action.

12.7. The procedures and measures for the protection of persons reporting incidents of corruption shall be governed by the Foundation's Policy on the Protection of Whistleblowers Reporting on corruption and legalization (laundering) of proceeds of crime and terrorist financing, to be approved by the Director General of the Foundation.

13. COMPLIANCE WITH THE ANTICORRUPTION POLICY

13.1. The Foundation's Staff Members, regardless of their position or duties performed for the Foundation, shall bear personal liability for non-compliance or improper compliance with the requirements of the Anticorruption Policy and undertake to compensate the Foundation for damages caused by the relevant violation.

13.2. Employees found guilty of violating the Anticorruption Policy may be held disciplinarily, civilly, administratively, or criminally liable.

13.3. The imposition of liability shall be initiated by the governing bodies of the Foundation, law enforcement agencies, or other authorized persons in accordance with the legislation of the Russian Federation.

14. INTERACTION WITH STATE, REGULATORY AND LAW ENFORCEMENT AUTHORITIES REGARDING COMBATING CORRUPTION

14.1. The cooperation with the state, regulatory and law enforcement authorities is an important indicator of the Foundation's commitment to anticorruption standards of conduct.

14.2. The Foundation undertakes to report to the law enforcement authorities all corruption offenses that come to the Foundation's knowledge.

14.3. When interacting with the state authorities exercising regulatory powers in respect of the Foundation, the Foundation's Staff shall refrain from any illegal and unethical conduct, offering or attempting to exert undue influence.

14.4. The Foundation's Staff Members shall cooperate with and assist authorized representatives of supervisory, regulatory, and law enforcement agencies during inspections or investigations of corruption offenses or violations related to the legalization (laundering) of proceeds of crime and terrorist financing.

14.5. The Foundation's Staff Members shall take all necessary measures to preserve and timely transfer upon request of the law enforcement authorities, documents and information containing data on incidents of corruption and violations related to the legalization (laundering) of proceeds of crime and terrorist financing.

15. REVISION AND AMENDMENTS

15.1. The Foundation regularly, but at least once a year, evaluates the Anticorruption policy for compliance with the current legislation. Subject to the changes in the laws of the Russian Federation and applicable standards and best practices, the Anticorruption policy may be amended as necessary. The Anticorruption policy shall be amended in the same manner as it is adopted.

15.2. Certain aspects of the Anticorruption policy may be specified through the development of other local regulations of the Foundation.

15.3. For all other issues not regulated by the Anticorruption policy, the provisions of applicable legislation and internal regulations of the Foundation shall apply.