

Approved

by Resolution of the Board of  
Directors  
of PJSC Inter RAO, dated  
December 20, 2018  
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24, 2018)

**Compliance Policy  
OF PJSC INTER RAO**

**PT-036-2**

Moscow


2018

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**1. TERMS AND DEFINITIONS**

Terms/Abbreviations	Definitions
Antitrust Legislation	The system of regulatory acts that consists of international treaties of the Russian Federation, Federal Law No. 135-FZ dated July 26, 2006, "On Protecting Competition," the Code of Administrative Offenses of the Russian Federation, other federal laws, decrees of the Government of the Russian Federation, and acts of the Federal Antimonopoly Service governing relations in the field of competition protection and prevention and suppression of monopolistic activities and unfair competition, including in the electrical power and heat supply industries.
Antimonopoly Risks	The possibility of negative consequences as a result of actions of the Company or its subsidiaries that violate antitrust legislation and may take the form of the imposition of sanctions on the Company or its subsidiaries for such violations, economic and/or financial loss, failure to achieve performance results, creation of a negative image, or other similar consequences.
Group	PJSC Inter RAO and its subsidiaries.
Subsidiary	1) A business entity whose decisions may be determined by the Company due to a controlling interest in its authorized capital or pursuant to a contract made between them or otherwise. Depending on how these decisions are determined—directly (i.e., by the Company itself) or indirectly (i.e., through other Subsidiaries)—a 1st Level Subsidiary, 2nd Level Subsidiary, etc. can be apportioned, respectively. 2) Within the "Internal Control" Functional Area, a legal entity controlled (managed) by the Company.
Procurement Legislation	The system of regulatory acts that consists of Federal Law No. 44-FZ dated April 5, 2013, "On the System of Contracts in the Field of Procurement of Goods, Works, Services for Public and Municipal Needs," Federal Law No. 223-FZ dated July 18, 2011, "On the Procurement of Goods, Works, Services by Certain Types of Legal Entities," and other federal laws and regulatory acts governing the relations related to procurement.
Compliance	Compliance of the activity of Inter RAO Group (the "Group") and the employees of the Group's companies with the requirements of international, Russian, and—if the activity is conducted outside the Russian Federation—applicable foreign laws and with the internal corporate standards and administrative documents and resolutions of the management bodies of the Group's companies.
Compliance Risk	The risk of application of legal sanctions or sanctions by regulatory agencies or loss of reputation by the Group as a result of its failure to comply with the laws, instructions, regulations, standards of self-regulating organizations, or codes of conduct concerning the energy sector or as a result

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	of failure to satisfy the lawful and justified interest of the customers, employees, and the Group as a whole.	
<b>Compliance System</b>	The scope of the corporate culture's elements and values aimed at rejection of illegal actions that consist of the rules and procedures governed by the internal regulations of the Group's companies, implemented by the functional areas, and ensuring the compliance by the employees of the Group's companies with the Compliance Principles, regardless of the position they hold.	

## 2. PURPOSE AND SCOPE

- 2.1. The Compliance Policy of PJSC Inter RAO (the "Policy") defines the goals and tasks of the Group in the course of its fulfillment, the Compliance Principles in the Group, and the key processes.
- 2.2. The Policy is a corporate standard of the Group approved for the effective management of the Compliance Risks, which is based on controlling the compliance of the Group activity with the legislative requirements, rules, and standards applied by the Group in its activity.
- 2.3. The Policy is based on the requirements of the international legal acts, laws of the Russian Federation, corporate standards applicable in the Group and includes relevant provisions of foreign standards, recommendations, acts, and best practices.
- 2.4. After approval by the management bodies of the Group's companies, the Policy shall apply to all employees and be recommended for implementation by each employee of the Group's companies.

## 3. REGULATORY REFERENCES

- 3.1. The United Nations Convention Against Corruption (UNCAC) (Resolution No. A/RES/58/4 dated October 31, 2003)
- 3.2. Criminal Law Convention on Corruption dated January 27, 1999
- 3.3. Convention on Combating Bribery of Foreign Public Officials in International Business Transactions dated December 17, 1997
- 3.4. Convention on Combating Bribery of Foreign Public Officials in International Business Transactions dated November 21, 1997
- 3.5. Code of Administrative Offenses of the Russian Federation, Federal Law No. 195-FZ dated December 30, 2001 (with amendments and supplements)
- 3.6. Civil Code of the Russian Federation (Part 2), Federal Law No. 14-FZ dated January 26, 1996 (with amendments and supplements)
- 3.7. Criminal Code of the Russian Federation, Federal Law No. 63-FZ dated June 13, 1996 (with amendments and supplements)
- 3.8. Labor Code of Administrative Offenses of the Russian Federation, Federal Law No. 195-FZ dated December 30, 2001 (with amendments and supplements)
- 3.9. Decree of the President of the Russian Federation No. 460 dated April 13, 2010, "On the National Strategy for Countering Corruption and on the National Plan for Countering Corruption for 2010–2011"

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- 3.10. Decree of the President of the Russian Federation No. 147 dated April 1, 2016, "On the National Plan for Countering Corruption for 2016–2017" (with amendments and supplements)
- 3.11. Decree of the President of the Russian Federation No. 378 dated June 29, 2018, "On the National Plan for Countering Corruption for 2018–2020"
- 3.12. Federal Law of the Russian Federation No. 273-FZ dated December 25, 2008, "On Countering Corruption"
- 3.13. Federal Law of the Russian Federation No. 115-FZ dated August 7, 2001, "On Countering Legalization (Laundering) of Proceeds from Crime and Financing of Terrorism"
- 3.14. Federal Law of the Russian Federation No. 224-FZ dated July 27, 2010, "On Countering Illegal Use of Insider Information and Market Manipulation"
- 3.15. Federal Law of the Russian Federation No. 44-FZ dated April 5, 2013, "On the System of Contracts in the Field of Procurement of Goods, Works, and Services for Public and Municipal Needs"
- 3.16. Federal Law No. 223-FZ dated July 18, 2011, "On the Procurement of Goods, Works, and Services by Certain Types of Legal Entities"
- 3.17. Methodological Recommendations for Developing and Taking Measures for the Prevention and Countering of Corruption by Organizations dated November 8, 2013 (Ministry of Labor and Social Protection of the Russian Federation)
- 3.18. UK Bribery Act 2010
- 3.19. Foreign Corrupt Practices Act 1977
- 3.20. Articles of Association of PJSC Inter RAO
- 3.21. Code of Corporate Ethics of PJSC Inter RAO
- 3.22. Fraud and Corruption Countering Policy of PJSC Inter RAO
- 3.23. Regulations on Insider Information of PJSC Inter RAO
- 3.24. Internal Audit Policy of PJSC Inter RAO and Regulation on Internal Audit Unit of PJSC Inter RAO
- 3.25. Antimonopoly Compliance Policy of PJSC Inter RAO
- 3.26. Regulation on Internal Control of PJSC Inter RAO
- 3.27. Corporate Risk Management Policy of PJSC Inter RAO
- 3.28. Regulation on the Procurement of Goods, Works, and Services for the Needs of PJSC Inter RAO
- 3.29. Regulation on the Information Policy of PJSC Inter RAO
- 3.30. ISO 19600:2014 Compliance Management Systems – Guidelines
- 3.31. Federal Law No. 135-FZ dated July 26, 2006, "On Protection of Competition"
- 3.32. Federal Law No. 381-FZ dated December 28, 2009, "On the Principles of State Regulation of Trading Activities in the Russian Federation"

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- 3.33. Decree of the Federal Agency for State Property Management No. 80 dated March 2, 2016, "On Approval of Methodical Recommendations for Organizing Risk Management and Internal Control in the Area of Prevention and Countering of Corruption"
- 3.34. Methodological Recommendations for Implementation of Internal Control of Compliance with Antimonopoly Legislation, Government Defense Order Legislation, and Legislation Regulating Procurement Activity approved by Decree of the Government of the Russian Federation No. 795-r dated April 26, 2017
- 3.35. The ICC Antitrust Compliance Toolkit from 2013

#### 4. COMPLIANCE GOALS AND TASKS OF THE GROUP

- 4.1. The Compliance goals of the Group include the following:
  - **Minimization of the risks of occurrence of a negative outcome** associated with the enforcement actions of the Group companies for failure to comply with the legislative requirements, regulatory requirements, principles of ethic business conduct at the markets of presence, and the generally acceptable standards of business ethics
  - **Conducting business** in compliance with the standards of business ethics and values of the Group
  - **Creating and implementing the Compliance Culture** in the Group companies
  - **Analyzing and preventing situations** that may result in failure to comply with legislative requirements, regulatory requirements, or the principles of ethical business conduct
- 4.2. These goals provide for achievement by the Group's companies of the following tasks (by organizing effective joint work of business units of the Group's companies, including through development of internal regulations, administrative documents, other internal documents) and creation of internal and external conditions for implementation of business processes of this system, including setting the respective requirements for employees, partners, and counterparties:
  - Forming a universal approach toward the management of Compliance Risks
  - Creating a system to prevent and eliminate violations of the requirements set by state regulatory bodies (including anticorruption requirements)
  - Creating a system to monitor fulfillment of the requirements set by state regulatory bodies (including anticorruption requirements)
  - Implementing business processes in the sphere of Compliance

#### 5. COMPLIANCE PRINCIPLES

Below are the principles the Group follows in building and implementing the Compliance System:

##### 5.1. Compliance with the standards of business ethics

The Group shall not use illegal approaches to doing business or approaches that do not comply with the generally accepted rules of business ethics.

5.2. **Compliance with the best national and international Compliance practices**

The Group's companies try to meet the best national and international Compliance practices in the course of their activity.

5.3. **Prevention of violations during Compliance System operation**

This implies the participation of all business units of the Group's companies in building the Compliance System, subject to the prevention of conflicts of interest, including by ensuring compliance with clear allocation of roles and responsibilities.

5.4. **Nonopposition to the performance of processes when building and implementing the Compliance System**

The Group's companies allocate enough resources required to develop, implement, utilize, monitor, and continuously improve the Compliance System and the organizational and technical instruments used in them and do not create artificial organizational, political, technical, and other limitations and impediments (including financial ones) to the accomplishment of these processes.

5.5. **Assurance of unrestricted, prompt, and unlimited access to the information**

The Group's companies provide their employees who support the Compliance System with any information required for its functioning while ensuring the required level of protection of information and information resources in accordance with the requirements of applicable laws.

5.6. **Adoption and compliance with all duly approved requirements of the Compliance System by all employees of the Group companies**

All employees of the Group companies, regardless of the office and other position they hold acknowledge, comply with and adhere to the duly established requirements of the Compliance System and require from the partners and counterparties of the Group companies to conduct business in accordance with the highest standards of business ethics.

5.7. **Timely and unbiased elimination of violations**

Employees of the Group's companies, regardless of the office or other position they hold, use all available tools to ensure prompt identification, unbiased evaluation, and elimination of violations of the Compliance System, including through a hotline.

5.8. **Liability and inevitability of punishment for failure to comply with applicable laws in the Group's companies**

The principle of inevitability of punishment for failure to comply with applicable laws in the Group's companies means that any offense will inevitably entail legal liability.

5.9. **Regular consideration of issues on the organization, functioning, and efficiency of the corporate risk management system in terms of Compliance**

Issues related to the functioning and efficiency of the corporate risk management system on Compliance are regularly considered at meetings of the respective collegiate and advisory governing bodies with the due consideration for the current internal regulations.

5.10. **Legality in terms of compliance with applicable laws**

The Group's companies follow the principle of legality—that is, the clear definition of the laws, the principle of the law.

5.11. **Regular assessment of risks of violations of applicable laws**

Risks in terms of a violation of applicable laws in the Group's companies are assessed based on internal regulations.

## 6. KEY COMPLIANCE PROCESSES

6.1. **"Management of the Organizational and Ethical Standards, Rules, and Values of the Group"** means the process of monitoring and checking the employees' actions with regard to compliance with the provisions of the Code of Corporate Ethics and requirements for the prevention of the conflict of interests.

6.1.1. By complying with the Code of Corporate Ethics, the Group pursues the following goals:

- Doing business in accordance with the highest standards of business ethics and values of the Group
- Preventing a conflict of interest among employees
- Implementing the Compliance Culture as an integral part of the corporate culture

6.1.2. Doing business in accordance with the highest standards of business ethics and values of the Group

- Thanks to its employees, the Group creates and develops its competitive advantages, achieves its goals, and retains its leading position. That is why it is necessary to maintain a favorable and sound environment at work places in the Group, which helps reveal the potential of each employee and improve labor productivity.
- The Group expects from each employee maximum commitment and the initiative to solve tasks and support a constructive work environment.
- When performing its official duties, an employee shall comply with this Policy, the Code of Corporate Ethics, and the Rules of Internal Labor Conduct.
- The Group shall respect human dignity and the right to individuality. Any offenses or any forms of discrimination or oppression on any grounds, including nationality, gender, age, religious beliefs, or sexual orientation, are unacceptable.
- It is necessary to develop and support respect and trust in relationships with the colleagues. Respect shall be based on recognition and acknowledgment of the individuality of each employee's personality. Trust shall be based on everyone's work for the common result for the Group.
- Respect and trust are shown not in declarations but in the real behavior of employees. The Group cares about each employee and strives to create safe labor conditions for everybody.
- The following actions are unacceptable in the Group's companies:
  - Physical violence
  - Sexual harassment
  - Use of obscenities
- The Group shall provide employees with all necessary resources for work and expects careful treatment of assets of the Group's companies by the employees. The employees shall observe the rational and careful use of assets of the Group's companies, use them only to achieve their work goals and perform their official duties, and be liable for the safety of assets of the Group's companies and for supporting their operability.



6.1.3. Preventing conflicts of interest among employees

- In the Group, a conflict of interest means a situation where the personal interest (direct or indirect) of an employee affects or may affect the proper, impartial, and unbiased performance of their job duties (exercise of powers), and when a contradiction between the personal interest of an employee and the rights and legitimate interests of the Company/Group's company arises or may arise that is capable of causing damage to the property and/or business reputation of the Company/Group's company.
- The causes of the conflict of interests may be:
  - Close personal relations beyond the frames of business relations between the employee of the Group company on the one part and the customer company, partner company, or their representatives on the other part
  - Family and other close relations between directly subordinated employees of the Group company
  - Employees of a Group's company using their official powers for personal benefit or personal gain to the detriment of the interests of the Group
- Informal communication with counterparties and employees of the Group's companies may be very useful in the development of business relations. Furthermore, employees of the Group shall make all efforts to avoid situations that may cause a conflict of interest and/or may be misunderstood. Employees who, in their opinion, may be involved in a conflict of interest must inform their manager about such to receive recommendations on the situation.

6.1.4. Implementing Compliance Culture as an integral part of the corporate culture

- The Group pays great attention to its business reputation and to opinions about it outside the Group. A good business reputation has been established as a result of the efforts and common work of all employees throughout the history of the Group.
- Business reputation is an asset of the Group that contributes to its further development. A good business reputation is maintained through the behavior of all employees. The Group considers negative judgments and statements that may harm the image of the Group, expressed in any form by employees outside the Group, including on social networks, noncompliant with the corporate ethics.
- Establishment of rules and recommendations for the appearance of employees is due to the Group valuing its business reputation. Employee appearance is a part of the corporate culture, and employees shall comply with the standards of business ethics of the Group.

6.2. **"Management of Legislative and Regulatory Requirements"** means a process for ensuring compliance with the technical standards and branch-specific requirements, industrial safety, and compliance with legislative requirements in all areas of the Group's activity as well as the response to legislative changes and changes in collaboration with the regulators and supervisory agencies.

6.2.1. Ensuring the compliance of its business with the applicable legislative and regulatory requirements at all markets of its presence, the Group strives to:

- Minimize the risks of sanctions due to failure to comply with applicable requirements
- Use its opportunities arising from legislative and regulatory changes in the best possible manner

- Be as transparent as possible for regulators

6.2.2. The Group uses the following approaches:

- The Board of Directors and the senior management of the Group understand all applicable fields of laws and regulators whose requirements the Group's activity must meet.
- The Group has organized regular monitoring of changes in legislation and regulators' requirements. The results thereof are delivered in a centralized manner to the employees whose activity is affected by such changes.
- The Group analyzes its risks and opportunities associated with the changes in laws and regulatory requirements. Decisions on risk management and use of opportunities are made in a centralized manner.
- The Group provides for the instruction and regular training of its key managers on legislative and regulatory requirements, risks, and related opportunities.
- Material facts related to the activity of the Group's companies are generally disclosed in accordance with the requirements of laws, regulators, and best practices.
- The Group ensures the implementation of target regulatory requirements in its activity, including in the processes of risk management and internal control.
- The Group builds its relations with regulators on the basis of transparency and readiness to cooperate.
- The Group has established and complies with the process of interaction with the regulators' supervisory bodies.

6.3. **"Preventing the Abuse of Insider Information and Securities Market Manipulation"** means the process of mitigating the Compliance Risks associated with unfair use of the insider information and securities market manipulation in accordance with the Regulation on Insider Information of the Company approved by the Board of Directors of the Company.

6.3.1. The Group uses the following approaches:

- The Group has a system to notify the persons who have access to insider information about their duties and responsibility.
- The Group controls access to and distribution of internal corporate information that can affect the stock market.
- The Group makes sure its employees comply with external and internal requirements aimed at limiting the possibility of securities market manipulation.
- Any abuses of insider information and securities market manipulations shall be subject to investigation.

6.3.2. Employees of the Group's companies shall safeguard the information they receive, transfer, and process. Protection of the information helps the Company reach its goals and be competitive in the services market. In this case, it means the information an employee uses in their professional activities, including the information contained on all corporate computers and other electronic media.

6.3.3. The Group applies certain protection standards and procedures that prevent unauthorized access to editing, deleting, or transferring the information to third parties. The Group

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shall reserve the right to take necessary actions against any person or group who uses the information they have received for personal gain without authorization.

6.4. **"Control over Compliance with Financial Obligations"** shall mean the process of expert review and monitoring of the fulfillment of the obligations assumed by the Group under loan agreements and the issue of securities.

6.4.1. The Group strives to:

- Prevent risks of the Group's default as a whole following a breach of its obligations
- Improve its image as a reliable borrower and the trust of financial institutions

6.4.2. The Group uses the following approaches:

- The Group provides centralized monitoring of its compliance with financial obligations.
- The Group has a unified register of existing financial obligations that indicates their maturity and the persons responsible for compliance with them. All responsible persons have read and understood the requirements and the consequences of their violation for the Group.
- Business transactions shall be performed with regard to compliance with current financial obligations. The Group has implemented procedures to inform about and manage the risks of violating financial obligations.
- Within the framework of its financial obligations, the Group promptly supplies its creditors/investors and authorized third parties with full information.
- Additional financial resources are raised in strict compliance with the available financial obligations.

6.5. **"Countering Fraud and Corruption"** means a process of mitigating the Compliance Risks associated with fraud and corrupt practices, including financial crimes involving assets and resources of the Group.

6.5.1. By conducting its business in an open and transparent manner, the Group strives to:

- Prevent corrupt practices by its employees
- Exclude any possibility of using assets and resources of the Group for financial crimes

6.5.2. The Group uses the following approaches:

- The Group ensures the functioning of an effective system to prevent financial crimes using its assets and resources based on international standards.
- The Group implements best practices for compliance with requirements for countering the financing of terrorism and legalization of income from crime.
- The Group creates and develops an effective mechanism for preventing corrupt practices based on legislative requirements and best practices.
- Group employees are aware of the most risky activities of the Group from the point of view of corrupt practices.
- The Group actively develops its mechanisms to counter receiving/making payments and gifts that may be regarded as made for the purpose of solving business tasks.

- The Group guarantees use of a transparent mechanism for procurement, spending of funds, financing of charitable actions, and collaboration with counterparties.
- 6.5.3. The Group finds it unacceptable to cover any hospitality costs or give/receive gifts if such costs or gifts, directly or indirectly, affect decisions to be made by the officials and/or persons associated with the state.
- 6.5.4. It is allowed to give/receive business gifts associated with the state holidays established by Russian law and only on the condition that it does not damage the interests of the Group and does not conflict with the law.
- 6.5.5. A gift shall be justified by its motive and the specifics of the business relations between the recipient of the gift or its giver and the Group. The rules adopted in the Group's companies with respect to giving/receiving gifts and with respect to their value shall be established in the internal regulations of the Group's companies.
- 6.5.6. If employees are unsure about a particular situation in which they are offered a gift, they must contact their manager.
- 6.5.7. Participation of employees in business breakfasts, lunches, and dinners is allowed only when they are organized for the purpose of discussing issues directly related to work and official duties of the employees, and when they are not in conflict with the internal documents of the Group's companies and the law.
- 6.5.8. During the course of their collaboration with customers, partners, and competitors, the employees of the Group's companies may receive offers to commit illegal actions or actions that violate the Code of Corporate Ethics. If an employee of a Group company receives an offer of that kind, the employee shall without delay notify an employee of the Economic and Corporate Security Unit and their own manager at a level no lower than department head.
- 6.5.9. Also, the Group does not tolerate any forms of collaboration with customers, partners, or competitors that are in conflict with the commercial interests of the Group:
- Receiving "agent's fees" of any kind and other forms of financial incentives by the employees of the Group's companies from other companies, either from customers and partners to the transactions or from competitors
  - Disclosing information about customers to competitors
  - Disclosing information about projects implemented in the Group to competitors
  - Transferring documents, business plans, descriptions of business processes, financial models, internal documents, and materials of the Group to competitors
- 6.5.10. To ensure the transparency of its business, the Group shall:
- Generate financial statements according to Russian and international standards pursuant to the requirements of Russian and international laws
  - Provide reliable information to its shareholders, investors, and government bodies in a timely manner
  - Comply with all laws and requirements applicable to the activity of the Group in the Russian Federation and in the countries of its presence
- 6.5.11. The Group follows a policy of transparency and cooperation in its relations with the mass media. Furthermore, the Group ensures the accuracy of the information it publishes according to the requirements of the current Russian legislation.

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- 6.5.12. To avoid risks to information and reputation and leakage of confidential information, it is forbidden for employees of the Group's companies to independently contact media representatives regarding the provision of information about the Group or comment on the Group's activity on any topic.
- 6.6. **"Risk Management in the Field of Personal Responsibility of Company Officers"** means the process of mitigating risks associated with the breach of applicable requirements by the company officers' actions.
- 6.6.1. The Group tries to minimize the risks of regulatory sanctions against the Board of Directors and the senior management as a result of noncompliance of their activities with the applicable requirements.
- 6.6.2. The Group uses the following approaches:
- The Group is aware of and understands the legislative and regulatory requirements for members of the Board of Directors and senior management.
  - The Group has an effective mechanism for monitoring and preventive management of the risks of noncompliance of the actions of the Board of Directors, senior management, and management of the Group's companies with legislative and regulatory requirements.
  - It provides for the insurance of liability of the Board of Directors and the senior management to third parties.
- 6.6.3. To perform their official duties, the employees of the Group's companies shall act in accordance with the internal regulations of the Group's companies. To use their official duties for personal benefit, personal gain or to give any preferences and special benefits to their relatives, friends, and so on is absolutely unacceptable. It is also unacceptable to go beyond one's authority.
- 6.7. **Antimonopoly Risk Management** shall mean the process aimed at mitigating risks of a violation of antimonopoly laws and procurement legislation (with respect to antimonopoly requirements) in the course of the Group's conduct of its economic activities.
- 6.7.1. To prevent and mitigate the risks of a violation of antimonopoly laws, including in the wholesale and retail electricity and capacity markets, the heat energy market, and other commodity markets in which the Group conducts its economic activities, or of procurement legislation (with respect to the antimonopoly requirement), a system for internal antimonopoly compliance regulated by the Antimonopoly Compliance Policy has been implemented in the Group.

## 7. ADHERENCE TO POLICY STANDARDS

- 7.1. The compliance processes are implemented in accordance with the functional responsibility at the level of business units of the Group's companies, whose scope of responsibility covers the following functional areas:
- 7.1.1. Security and regulations
  - 7.1.2. Legal activities
  - 7.1.3. Internal audit, control, and risk management
  - 7.1.4. HR management and organizational development
  - 7.1.5. Corporate and property relations
  - 7.1.6. Finance and economy
  - 7.1.7. Information policy

- 7.1.8. Procurement (supply)
- 7.1.9. Supply business
- 7.1.10. Electric power generation and thermal energy business
- 7.1.11. Engineering
- 7.2. A breach of Policy requirements may be grounds for disciplinary action against employees in accordance with the current laws of the Russian Federation.
- 7.3. In their professional activities, employees shall comply with all standards and rules established by the Group company with which they have signed employment agreements. A breach of Policy standards can result in reduced performance and the threat of image risks and losses for a Group's company, which will directly affect the well-being of all its employees.
- 7.4. The managers at all management levels are the leaders of the Compliance Principles: they set an example of the behavior that corresponds to the Compliance Principles, and they guide their subordinates to unconditional adherence to the Compliance Policy in the Group's companies.
- 7.5. If employees have any questions related to the application of the standards and rules of this Policy, or if they are not sure if their actions or decisions comply with the Policy standards, they may consult with their immediate superior.
- 7.6. Employees of the Group's companies and other third parties are given an option for confidentially and, if they so wish, may anonymously report any possible violations using the hotline at [hotline@interra.ru](mailto:hotline@interra.ru).