

Appendix to the decision
of the Board of Directors
of IDGC of Centre, JSC
(Minutes # 03/14 of 03.03.2014)

**Anti-corruption policy
of IDGC of Centre, JSC**

**Moscow
2014**

1. General provisions.

1.1. The summary.

1.1.1. The purpose of development of the document.

This «Anti-corruption policy of IDGC of Centre, JSC» is an internal document of IDGC of Centre (hereinafter - the Company), being the base document in sphere of counteraction of corruption and determining the primary goals, principles and directions of anticorruption activity under the prevention, revealing and suppression of corruption displays in the Company.

1.1.2. The document summary.

This document specifies:

- purpose and tasks of the Anti-corruption policy of the Company;
- principles of the Anti-corruption policy of the Company;
- structure of management of anticorruption activity of the Company;
- basic directions of the Anti-corruption policy of the Company;
- basic events for prevention of corruption, legal education and forming of bases of law-abiding behaviour of employees of the Company.

1.1.3. The target user of the document.

The Anti-corruption policy of the Company is intended for use by a structural division of the Company, responsible for implementation and realisation of the Anti-corruption policy of the Company, and also employees of the Company (structural divisions of the Company and its SDCs) regarding observance of principles and requirements of this Anti-corruption policy of the Company and key norms of applied anti-corruption legislations of the Russian Federation.

The Anti-corruption policy of the Company extends on counterparts and representatives of the Company and its SDCs, and also on other persons when corresponding obligations are fixed in contracts with them.

Concerning SDCs the Anti-corruption policy contains provisions of general (methodological) character with the description of a process of interaction of the Company with SDCs at the organisation of work in the field of realisation of an anticorruption policy.

The Anti-corruption policy (including separate provisions of the Anti-corruption policy) is subject to use in SDCs as a basis for development of internal documents of SDCs determining questions of realisation of the Anti-corruption policy.

1.2. The basic concepts.

Anti-corruption disclaimer	A section of contracts, agreements, deals of the Company, declaring carrying out by the Company of an anticorruption policy and development of culture not supposing corruption displays
Company	IDGC of Centre, JSC
Corruption (in commercial organisations)	bribery, bribe reception, abusing powers, commercial payoff or other illegal use by employees of their position contrary to legitimate interests of the Company with a view of reception of benefit in the form of money, values, other property or services of property character, other laws of estate for themselves or for the third parties or illegal granting of such benefit to a specified person by other physical persons, and also fulfilment of specified acts on behalf of or in interests of a legal entity
Commercial payoff (Article 204 of the Criminal Code of the Russian Federation)	illegal transfer to a person, who carries out administrative functions in a commercial or other organisation, money, securities, other property, rendering to him services of property character, granting of other laws of estate for fulfilment of actions (failure to act) in interests of the giving person in connection with his occupied office position. Illegal reception by a person, who carries out administrative functions in a commercial or other organisation, money, securities, other property, and equally illegal using services of property character or other laws of estate for fulfilment of actions (failure to act) in interests of the giving person in connection with his occupied office position
Abusing powers (Article 201 of the Criminal Code of the Russian Federation)	use by a person, who carries out administrative functions in a commercial or other organisation, of powers contrary to legitimate interests of this organisation and with a view of extraction of benefits and advantages to or other persons or damage incurred by other persons if this act has entailed causing of essential harm to the rights and legitimate interests of citizens or organisations or a protected law in interests of the society or the state
Bribery (Article 291 of the Criminal Code of the Russian Federation)	bribing an official, a foreign official or an official of a public international organisation personally or through an intermediary

<p>Illegal compensation on behalf of a legal entity (Article 19.28 of the Code of Administrative Offences of the Russian Federation)</p>	<p>illegal transfer, an offer or a promise on behalf of or in interests of a legal entity to an official, a person, who carries out administrative functions in a commercial or other organisation, a foreign official or an official of a public international organization of money, securities, other property, rendering to him services of property character, granting of laws of estate for fulfilment in interests of the given legal entity, the official, the person, who carries out administrative functions in a commercial or other organisation, the foreign official or the official of the public international organisation of the action (failure to act) connected with the office position occupied by them</p>
<p>illegal attraction to labour activity or to accomplishment of works or rendering of services of a state or municipal servant or former state or municipal employee (Article 19.29 of the Code of Administrative Offences of the Russian Federation)</p>	<p>attraction by the Company to labour activity on the terms of a labour agreement or to accomplishment of works or rendering of services on the terms of a civil-law agreement of a state or municipal employee acting for a post, included in <u>the list</u> established by standard legal acts, or a former state or municipal employee acting for such a post, with infringement of the requirements provided by Federal Law dated December, 25th, 2008 # 273-FZ «About corruption counteraction»</p>
<p>Corruption displays</p>	<p>actions (failure to act) of employees of the Company, containing signs of corruption or promoting its fulfilment</p>
<p>Subjects of the Anti-corruption policy</p>	<p>any employee of the Company, including employees of SDCs, their representatives, and also counterparts and other persons connected with the Company when corresponding obligations are fixed in contracts with them</p>
<p>Anticorruption monitoring</p>	<p>monitoring of events conducted in the Company in the field of the corruption counteraction, performed for the purpose of provision of an estimation of efficiency of specified events, estimation and forecast of corruption factors and signals; analysis and estimation of the data received as a result of supervision; developments of forecasts of the future condition and tendencies of the development, corresponding events</p>
<p>Anti-corruption</p>	<p>an activity to prevent inclusion in drafts of documents of</p>

examination	provisions promoting creation of conditions for display of corruption; to reveal and eliminate such provisions in acting documents
Corruption prevention	an activity of subjects of the anticorruption policy, directed on revealing, studying, restriction or elimination of reasons and conditions promoting corruption displays
Conflict of interest	a situation at which personal interest (direct or indirect) of an employee of the Company influences or can affect proper execution official (office) obligations by him and at which there can be a contradiction between personal interest of the employee of the Company and the rights and legitimate interests of the Company or arises, capable to lead to damaging interests of the Company
Material benefit	economic gain in the monetary or natural form which can be estimated and specified as the income according to tax laws of the Russian Federation
Personal benefit	interest of an employee of the Company, its near relations, the spouse, the adoptive parent, adoptees in reception of non-material and other non-material advantages. Promotion and gratitude announcement are not personal benefit
The Organizer of purchase	the person (a legal entity or a businessman without formation of the legal entity), directly carrying out provided by that or different way of procedure of purchase and undertaking corresponding obligations to participants of purchase
Preconflict situation	a situation at which employees of the Company, and also the Organizer of purchases or his representatives, at realisation by them of their office or professional activity, have some personal interest which can lead to the conflict of interests
SDCs	Affiliated and dependent companies of IDGC of Centre

1.3. The purpose and tasks of the Anti-corruption policy of the Company.

1.3.1. The purpose of the Anti-corruption policy is development and realisation of versatile and consecutive measures for the prevention, revealing and elimination (minimisation) of the reasons and the conditions generating corruption, forming anti-corruption consciousness characterised by intolerance of employees of the Company, shareholders of the Company, investment community, counterparts, members of management bodies and control of the Company to corruption displays.

1.3.2. The tasks of the anticorruption policy of the Company are:

- forming with shareholders, investment community, counterparts, members of management bodies and control, employees of the Company uniform understanding of a position of the Company about aversion of corruption in any forms and displays;
- minimisation of risk of involving the Company, members of the Board of Directors and the Audit Commission, General Director, members of the Management Board, members of Committees under the Board of Directors and employees of the Company, irrespective of a post, in corruption activity;
- prevention of corruption displays and provision of responsibility for corruption displays;
- compensation of the damage caused by corruption displays;
- anticorruption monitoring on conformity of efficiency of measures of the anticorruption policy;
- forming anti-corruption corporate consciousness;
- creation of the legal mechanism preventing payoff of subjects of the anticorruption policy;
- establishment of an obligation of employees of the Company to be aware of and to observe principles and requirements of the Anti-corruption policy, key norms of applied anti-corruption legislations of the Russian Federation;
- creation of stimulus to substitution for posts in the Company by incorruptible persons.

1.4. Principles of the Anti-corruption policy of the Company.

The principles of the anticorruption policy of the Company are:

- a principle of aversion of corruption in any forms and displays at realisation of daily activity and strategic projects, including in interaction with shareholders, investors, counterparts, representatives of authorities, local government, political parties, own employees, members of management bodies and control, employees and other persons;
- a principle of minimisation of risk of business relations with counterparts who can be involved in corruption activity or are tolerant to corruption displays.
- a principle of legation of members of management bodies of the Company. Members of the Board of Directors, General Director, members of the Management Board of the Company should form the ethical standard of the irreconcilable attitude to any corruption forms and displays at all levels, setting an example with their behaviour.
- a priority of measures to prevent corruption and the morals of fight against corruption in the Company;
- inadmissibility of establishment of privileges and immunities limiting responsibility or complicating an order of bringing to responsibility of a certain group of employees of the Company, who made corruption displays;
- inadmissibility of restriction of access to the information on facts of corruption and measures of the anticorruption policy;

– monitoring and control. The Company performs monitoring of the implemented adequate procedures on corruption prevention, supervises their observance and regularly improves them.

1.5. The legal basis of the Anti-corruption policy of the Company.

The legal basis of the Anti-corruption policy is as follows:

– International legal standards (the United Nations Convention against Corruption, accepted by General Assembly of the United Nations at the 51st plenary session on the 31st of October 2003, the Criminal Law Convention on Corruption (ETS N173) dated 27.01.1999, Federal Law dated from 25.07.2006 # 125-FZ «About Ratification of the Criminal Law Convention on Corruption»;

– The Constitution of the Russian Federation;

– Federal Law from December, 25th, 2008 # 273-FZ «About corruption counteraction», other federal acts and other standard legal acts providing measures to prevent corruption, suppression of corruption offences and responsibility for them;

– The Articles of Association of the Company, internal documents, local regulations and other organizational-administrative documents of the Company in the field of corruption counteraction.

1.6. Structure of management of the anticorruption activity of the Company and its SDCs:

Efficient control over the anticorruption activity of the Company is achieved at the expense of productive and operative interaction of following participants:

1) The Board of Directors is a governing body of the Company, determining key strategic directions of the Anti-corruption policy of the Company, and performing control over their effective realisation.

The Board of Directors:

- approves the Anticorruption policy of the Company;
- considers and confirms changes and additions to the Anticorruption policy of the Company;
- supervises general results of implementation and application of the Anti-corruption policy of the Company

2) General Director of the Company:

- is responsible for the organisation of all events directed on realisation of principles and requirements of the Anti-corruption policy of the Company, including appointment of persons responsible for development of anticorruption procedures, their implementation and control;
- performs the control over realisation of the Anti-corruption policy of the Company and submits a report on observance of the Anti-corruption policy for consideration by the Board of Directors of the Company;

3) The structural division of the Company, responsible for implementation and realisation of the Anti-corruption policy of the Company:

- carries out the events directed on realisation of principles and requirements of the Anti-corruption policy of the Company;
- performs the activity for prevention, revealing, consideration and suppression of corruption displays, a conflict of interests;
- co-ordinates activity of structural divisions of the Company in the field of realisation of the Anti-corruption policy of the Company;
- takes part in summits, scientifically-practical seminars, conferences of the Russian and international level in sphere of counteraction of corruption;
- performs interaction with public authorities and local governments, scientific and educational organisations and organisations in sphere of counteraction of corruption;
- realises events for forming anti-corruption corporate consciousness;
- co-ordinates the process of identification of corruption risks, characteristic for spheres of the Company's activity;
- performs planned and off-schedule checks of observance by the Company of principles of the Anti-corruption policy of the Company, constitutes reports by results of the conducted checks;
- performs development of documents of the Company in sphere of counteraction of corruption and initiates update of documents of the Company in connection with change of anti-corruption legislations of the Russian Federation.

4) The Commission on observance of norms of corporate ethics and settlement of the conflict of interests – a collegial body of the Company, performing consideration of the questions connected with execution of provisions of the Code of Conduct of the Company, standards of corporate behaviour, settlement of the conflict of interests, including owing to revealing of corruption displays.

5) Structural divisions of the Company and directly employees perform observance and execution of principles and requirements of the Anti-corruption policy of the Company in their current activity.

6) It is recommended to chief executive powers of SDCs to initiate implementation in SDCs of their own anticorruption policy, similar to this Policy, and also to make reasonably possible efforts so that the basic principles and requirements of this Policy to be observed in SDCs.

2. Directions of the Anti-corruption policy of the Company.

2.1. Anti-corruption examination.

2.1.1. Compulsion of carrying out of anticorruption examination of organizational-administrative and internal normative documents and their drafts by structural division of the Company, responsible for implementation and realisation of the Anti-corruption policy of the Company, is declared in the Company.

2.1.2. The Company determines an order of carrying out of anticorruption examination of documents of the Company.

2.1.3. The structural division of the Company, responsible for implementation and realisation of the Anti-corruption policy of the Company, makes anticorruption examination of documents in the Company.

2.2. Purchasing activity.

2.2.1. The Company declares an open and competitive system of carrying out of purchasing procedures and thus establishes:

- careful planning of requirement for goods;
- the market analysis;
- information openness of a purchase;
- equality, justice, absence of discrimination and unreasonable restrictions of a competition in relation to participants of a purchase;
- a fair and reasonable choice of the most preferable offers at a thorough analysis of benefits and costs (first of all the prices and qualities of goods);
- targeted and economically effective expenditure of money funds on acquisition of goods, works, services (taking into account, at necessity, the cost of a life cycle of bought goods) and realisations of measures directed on reducing costs of the Company;
- absence of restriction of the admission to participation in purchase by establishment of not measured requirements to the participant of purchase;
- provision of publicity and transparency of purchases, prevention of corruption displays, the conflict of interests and other abusings;
- observance of anticorruption standards of purchasing activity (disclosing of a chain of proprietors (beneficiaries) of counterparts).

2.2.2. The Company with a view of development of a diligent competition, provision of publicity and transparency of purchase, prevention of corruption and other abusings declares creation of an anti-corruption control system over the Company's purchasing activity.

2.2.3. The structural division of the Company, responsible for implementation and realisation of the Anti-corruption policy of the Company, performs the anticorruption control over the purchasing activity by making checks on the availability of any affiliation and the conflict of interests between counterparts (final beneficiaries) and employees of IDGC of Centre.

2.2.4. The Company declares that not competitive purchasing procedures are performed in the cases directly provided by an organizational-administrative document, determining an order of carrying out of purchases of goods, works, services for needs of the Company.

2.3. Anticorruption monitoring.

2.3.1. Anticorruption monitoring in the Company includes monitoring of anticorruption measures and events which are conducted within the limits of realisation of the Anti-corruption policy of the Company, and also revealed facts of corruption and methods of their elimination.

2.3.2. The basic directions of the anti-corruption monitoring are:

- generalisation and analysis of results of anticorruption examination of documents of the Company;
- studying of opinion of the labour collective about a corruption condition in the Company and efficiency of accepted anticorruption measures;
- analysis of execution of the anticorruption events provided by organizational-administrative documents of the Company;
- studying and analysis of the statistical reporting about the facts of corruption revealed in the Company, estimation and forecast of corruption creating factors and signals;
- analysis of complaints and calls of physical and legal persons about corruption displays in the Company;
- analysis of publications about corruption in the Company in mass media, etc.

2.4. Consideration and permission of the information on possible facts of corruption.

2.4.1. The Company declares openness in fight against corruption.

2.4.2. The Company permits calls of employees of the Company, counterparts and others (physical and legal) persons about corruption facts.

2.4.3. The Company receives calls about facts of corruption with use of the interactive channel of interaction with applicants (an Internet site, «hot line» phone), and also by means of mail and at personal reception.

2.4.4. The Company aspires to creation of an effective system of consideration and permission of calls about corruption facts in the Company, preparation of answers in the terms established by the legislation of the Russian Federation and legal acts of the Company.

2.4.5. The Company aspires to creation of a complex of effective measures to check the information on possible facts of corruption, and in case of their confirmation to elimination (minimisation) of their consequences and the reasons, causing them.

2.5. Management of the conflict of interests.

2.5.1. Carrying out of events for observance of norms of corporate ethics and settlement of the conflict of interests is declared in the Company (specified by the

Code of Conduct).

2.5.2. The Company created the Commission on observance of norms of corporate ethics and settlement of the conflict of interest and its functions.

2.5.3. The Company realises measures on non-admission of origin of the conflict of interests which are aimed at eliminating of possibility of reception personally or through an intermediary material and (or) personal benefit owing to availability at employees of the Company, or members of their families, or the persons who are of close relationship or properties (parents, spouses, children, brothers, sisters, and also brothers, sisters, parents, children of spouses and children of the spouse), of the rights giving such possibility as a result of use of the office position by them.

2.5.4. The Company aspires to non-admission and timely settlement of preconflict situations among employees of the Company.

2.5.5. The Company establishes measures of corporate influence (responsibility) to employees of the Company for the losses caused owing to their wrongful acts in the conditions of the conflict of interests.

2.5.6. The structural division of the Company, responsible for implementation and realisation of the Anti-corruption policy of the Company, is a structural division of the Company, ensuring functioning of the Commission on observance of norms of corporate ethics and settlement of the conflict of interest.

2.6. Interaction with counterparts.

2.6.1. The Company aspires to co-operate with the counterparts supporting the Anticorruption policy of the Company, and the counterparts declaring nonacceptance of corruption.

2.6.2. The Company conducts explanatory work with supervisors of contracts and counterparts at refusals of signing of anticorruption disclaimers.

2.6.3. The Company declares that it refuses stimulation somehow of employees of counterparts, including by granting of sums of money, gifts, non-paid accomplishment of works (services) for them and other methods not named hereto, putting an employee of the counterpart in certain dependence and directed for accomplishment on provision by this employee of any actions in advantage of the Company.

2.6.4. The Company declares carrying out of its transparent financial activity with counterparts and supports the state policy on taking the national economy and its strategic industries from an offshore shade.

2.6.5. The structural division of the Company, responsible for implementation and realisation of the Anti-corruption policy of the Company, performs events for collection, check, consolidation of the information concerning all chain of proprietors of participants/potential participants of purchases, including beneficiaries (including final), and also data on membership of executive powers of participants/potential participants of purchases, including registered in offshore zones.

2.7. Forming of the senior executive body of the Company.

2.7.1. The Company implements a system approach to the process of the coordination of appointment of nominations for administering posts and dismissal from the given posts of the Company.

2.7.2. The Company performs collection and analysis of the information on income, property and obligations of property character of executive personnel.

2.8. Participation in charities and sponsorship.

2.8.1. The Company does not perform independently or through SDCs, and also its employees and employees of SDCs financing of charitable and sponsor's projects with a view of advantage reception or preservation in its business activity.

2.8.2. The information on charitable and sponsor's activity is published on the Internet site of the Company or revealed otherwise, including through mass media.

2.9. Participation in political activity.

2.9.1. The Company does not perform independently or through SDCs, and also its employees and employees of SDCs financing of political parties, public associations with a view of advantage reception or preservation in its business activity.

2.9.2. Employees of the Company have the right to participate in public associations, such as political parties, public organisations, social movements, public funds, and other non-profit organisations created according to the current legislation of the Russian Federation, and also in the international public associations which purpose is not reception or preservation of advantage for the Company in its business activity.

2.9.3. Employees of the Company at participation in public associations are forbidden to offer, give, promise, or to make payments, to bring property, to give gifts etc. on behalf of the Company for the purpose of reception or preserving of advantage for the Company in its business activity.

2.9.4. Employees of the Company independently bear responsibility according to the current legislation of the Russian Federation for participation in public organisations.

2.10. Interaction with civil servants.

2.10.1. The Company does not perform independently or through SDCs, and also its employees and employees of SDCs payment of any expenses (monetary compensation, loans, services, payment of entertainments, rest, cost of transportation and other compensations) for civil servants and their close relatives (or in their interests) with a view of advantage reception or preservation for the Company in its business activity.

2.10.2. Employees of the Company at interaction with civil servants are obliged to observe provisions of this Anti-corruption policy.

2.10.3. Employees of the Company independently bear responsibility for corruption displays at interaction with civil servants according to the current legislation of the Russian Federation.

2.11. Affiliated and dependent Companies.

The Company by means of realisation of the rights of a shareholder of SDCs with corporate governance methods initiates implementation in SDCs of own anticorruption policy, similar to this one, and also makes reasonably possible efforts so that basic principles and requirements of the Anti-corruption policy of the Company to be observed in joint ventures, companies and associations where the Company participates.

2.12. Payments through intermediaries or for benefit of the third parties.

2.12.1. The Company and its employees are forbidden to involve or use intermediaries, partners, agents, joint ventures or other persons for fulfilment of any actions which contradict principles and requirements of the Anti-corruption policy of the Company or to norms of applied anti-corruption legislations.

2.12.2. The Company provides availability of procedures to check intermediaries, partners, agents, joint ventures and other persons for prevention and-or revealing described above infringements with a view of minimisation and suppression of risks of involving the Company into some corruption activity.

3. Corruption prevention, legal education and forming of bases of law-abiding behaviour of employees of the Company.

3.1. Information-educational events are performed in the Company.

3.1.1. The Company creates and improves the section «Anti-corruption policy» on the Internet site of the Company in which the information on the documents accepted in the Company directed on fight against corruption, on events conducted in the Company on corruption counteraction, its prevention, legal education and forming of bases of law-abiding behaviour of employees of the Company is placed.

3.1.2. The Company places the information on events for realisation of the Anti-corruption policy in the corporate newspaper, in all mass media in free access.

3.1.3. The Company declares necessity of carrying out of periodic seminars and trainings in the internal and-or remote form to form intolerant attitude to corruption displays.

The Company conducts orientation training in provisions of the Anti-corruption policy of the Company and the documents connected with it – for all newly employed workers of the Company, and also questioning and testing of employees of the Company concerning the attitude to corruption displays.

3.1.4. The Company applies the practice of use of social advertising and means of evident propaganda – information stands on forming negative attitude to all corruption displays and moral condemnation of corrupt officials.

3.2. The Company holds events of stimulating character.

3.2.1. The Company declares that any employee will not be subjected to sanctions (including his dismissal, demotion, deprivation of an award) if he has reported about an expected fact of corruption or if he has refused to bribe, make commercial payoff or to act as an intermediary in bribery even if as a result of such

refusal the Company has, including, lost profit or has not received commercial and competitive advantages.

3.2.2. The Company stimulates employees for granting of the confirmed information on corruption displays in the Company.

3.3. The Company declares carrying out of events for forming anti-corruption corporate consciousness.

3.3.1. The Company demands from the employees to observe the Anti-corruption policy of the Company, informing them on key principles, requirements and sanctions for infringements. All employees of the Company should be guided by the Anticorruption policy of the Company and strictly observe its principles and requirements. The Company without fail enters into an obligation (agreement) about observance of principles and requirements of the Anti-corruption policy of the Company and norms of anti-corruption legislations with each employee at conclusion of an employment agreement.

3.3.2. The Company declares necessity of development of mechanisms of corporate influence for fulfilment of corruption displays.

3.3.3. Observance by employees of the Company of principles and requirements of the Anti-corruption policy is considered at forming personnel reserve for promotion for higher posts.

4. Reporting

4.1. The reporting about realisation of the Company and about conformity of the Company's activity to principles and requirements of the Anti-corruption policy of the Company and to norms of applied anti-corruption legislations is performed by means of the anti-corruption monitoring the results of which are arranged two times a year.

4.2. General Director of the Company every six months submits for consideration by the Board of Directors of the Company the reporting specified in item 4.1. of this Policy of the Company within the report on execution of decisions of the Board of Directors of the Company.

4.3. The Company places the information containing results of anti-corruption of monitoring in the section «Anti-corruption policy» on the Internet site of the Company, and in the corporate newspaper.

5. Responsibility

5.1. Members of the Board of Directors and the Audit Commission, members of Committees under the Board of Directors, General Director, members of the Management Board, employees of the structural division of the Company, responsible for implementation and realisation of the Anti-corruption policy of the Company, and employees of all structural divisions of the Company irrespective of a post, bear responsibility for observance of principles and requirements of the Anti-corruption policy of the Company, and also for actions (failure to act) of the persons subordinated to them violating these principles and requirements.

5.2. Measures of liability for corruption displays in the Company refer to: measures of criminal, administrative and disciplinary responsibility according to the legislation of the Russian Federation and measures of corporate influence according to legal acts of the Company.

5.3. The Company has the right to conduct office checks on each reasonable suspicion or a corruption fact identified in the frameworks, allowed by the legislation of the Russian Federation.

6. Modification

At revealing not enough effective provisions of the Anti-corruption policy of the Company or at change of requirements of the applied legislation of the Russian Federation, General Director of the Company will organise preparation for update of the Anti-corruption policy of the Company.

**Agreement on observance of requirements
of the Anti-corruption policy of IDGC of Centre, JSC**

« ___ » _____ 201_ _____

IDGC of Centre on behalf of _____ acting on the basis of _____, hereinafter referred to as "*Employer*", on the one hand, and _____ hereinafter referred to as "*Employee*", on the other hand, have concluded this agreement as follows:

1. "*Employee*" is acquainted with the Anticorruption policy of IDGC of Centre, approved by the decision of the Board of Directors of IDGC of Centre (Minutes dated _____ # _____) (hereinafter – the Anti-corruption policy), and also undertakes to observe the requirements established by the Anticorruption policy.

2. "*Employee*" at execution of the labour obligations under the Labour agreement according to the Anticorruption policy undertakes not to make corruption offences, i.e. - not to allow a bribe (not to act as an intermediary in bribery), not to abuse powers, not to participate in commercial payoff or other illegal use of the official position contrary to legitimate interests of IDGC of Centre with a view of non-paid or with use of advantages of reception of benefit in the form of money, securities, other property, including laws of estate, works or services of property character, to his or her own advantage either for benefit of other persons or for rendering of influence on actions or decisions of any persons (including - official) and-or bodies for reception of superficial advantages, achievement of other illegal purposes.

3. "*Employee*" is obliged to notify "*Employer*" in case of a call to him or her of any persons with a view of his or her corruption and also in case "*Employee*" becomes aware that on behalf of IDGC of Centre (including - on behalf of branches of IDGC of Centre) organisation (preparation) and-or fulfilment of corruption offences is performed.

4. "*Employee*" is obliged to take measures on non-admission of any possibility of origin of the conflict of interests in understanding of the Anti-corruption policy and legislations of the Russian Federation and

immediately to notify *"Employer"* on the arisen conflict of interests or about possibility of its origin as soon as he or she becomes aware of.

5. *"Employee"* is aware that *"Employer"* does not punish him or her (including - application of summary punishments), and also does not make no calculation of awards or bonus charge in a smaller amount in relation to the greatest possible size if *"Employee"* has reported to *"Employer"* about an expected fact of a corruption offence.

6. *"Employee"* is aware that *"Employer"* stimulates employees for provision of any confirmed information on corruption offences in IDGC of Centre.

Observance by *"Employee"* of principles and requirements of the Anti-corruption policy is considered at forming of personnel reserve for promotion of *"Employee"* for higher posts substitution.

7. *"Employee"* is warned about bringing to a disciplinary responsibility in an order established by the legislation of the Russian Federation for infringement of the anticorruption requirements provided by the legislation of the Russian Federation, and the Anticorruption policy as well.

8. This agreement about observance of requirements of the Anti-corruption policy enters into force from « ____ » _____ 201 ____ , and acts until the termination (cancellation) of labour agreement # ____ dated « ____ » _____ 20 ____

9. This agreement about observance of requirements of the Anti-corruption policy is an integral part of the Labour agreement, is made in duplicate, having an identical legal force. One copy of the agreement on observance of requirements of the Anti-corruption policy is stored in the personnel file of the employee at the office of *"Employer"*, the second one - with *"Employee"*.

"Employer"

"Employee"
