



**APPROVED**  
**General Director**  
**LLC "Loftice"**  
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**ANTI-CORRUPTION POLICY**  
**LLC "LOFTICE"**

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## **1. PURPOSE OF THE DOCUMENT**

- 1.1. This Anti-Corruption Policy (hereinafter referred to as the “Policy”) is the basic document of Loftice LLC (hereinafter referred to as Loftice), defining the key principles and requirements aimed at preventing corruption and establishing compliance with applicable anti-corruption legislation of all employees of Loftice and other persons who may act on behalf of the Loftice.
- 1.2. The policy is developed in accordance with the legislation of the Russian Federation, the Charter, the Code of Conduct and other internal documents of Loftice.
- 1.3. The policy is formulated taking into account the fact that in Russia “corruption”, “corruption actions”, “corruption activities”, as a rule, will be considered giving or receiving bribes, mediating in giving or receiving bribes, abuse of official position or authority, commercial bribery, payments to simplify formalities, the unlawful use by an official of his/her position to obtain benefits in the form of money, valuables, other property, services, any rights for himself or for other persons or illegal provision of benefits or rights to this person by other persons.

## **2. POLICY OBJECTIVES**

- 2.1. The policy reflects the commitment of Loftice and its management to high ethical standards and principles of open and honest business, as well as the desire of Loftice to improve the corporate culture, follow the best practices of corporate management and maintain Loftice business reputation at the proper level.
- 2.2. The company goals:
  - Minimize the risk of involving Loftice, the management of the organization and Loftice employees, regardless of their position (hereinafter collectively referred to as “Employees”), in corruption activities.
  - To form with counterparties, employees and other persons a clear understanding of Loftice policy of rejection of corruption in all forms and manifestations.
  - Summarize and clarify the basic requirements of the anti-corruption legislation of the Russian Federation that can be applied to Loftice and employees.
  - Establish the duty of Loftice employees to be aware and comply with the principles and requirements of this Policy, the key rules of applicable anti-corruption legislation, and adequate measures to prevent corruption.



### **3. SCOPE AND RESPONSIBILITIES**

- 3.1. All Loftice employees must be guided by this Policy and strictly abide by its principles and requirements.
- 3.2. General Director of Loftice is responsible for the organization of all activities aimed at implementing the principles and requirements of this Policy, including the appointment of persons responsible for the development of anti-corruption measures, their implementation and control.
- 3.3. The principles and requirements of this Policy apply to counterparties and Loftice representatives, as well as to other persons, in cases where the corresponding obligations are enshrined in contracts with them, in their internal documents, or directly follow the law.

### **4. APPLICABLE ANTI-CORRUPTION LEGISLATION**

- 4.1. Russian anti-corruption legislation: Loftice and all employees must comply with the Russian anti-corruption legislation, established by the Criminal Code of the Russian Federation, the Code of Administrative Offenses of the Russian Federation, the Federal Law "On Countering Corruption" and other regulations that prohibit bribery, the prohibition of commercial bribery and the prohibition of mediation in bribery.
- 4.3. In view of the foregoing, all Loftice employees are strictly prohibited, directly or indirectly, personally or through third parties to engage in corrupt activities, offer, give, promise, request and receive bribes or make payments to simplify administrative, bureaucratic and other formalities in any form, including cash, values, services or other benefits, to any persons and from any persons or organizations, including commercial organizations, authorities and self-government bodies, public services public, private companies and their representatives.

### **5. KEY PRINCIPLES**

#### **5.1. Top management mission**

The General Director and senior officials of Loftice must form an ethical standard of an irreconcilable attitude to all forms and manifestations of corruption at all levels, setting an example by their behavior and making them familiar with the anti-corruption policies of all employees and counterparties.



Loftice establishes the principle of non-acceptance of corruption in all forms and manifestations (the principle of "zero tolerance") in the implementation of daily activities and strategic projects, including in cooperation with contractors.

Loftice establishes the principle of non-acceptance of corruption in all forms and manifestations (the principle of "zero tolerance") when carrying out daily activities and strategic projects, including cooperation with contractors, representatives of government, self-government, political parties, their Employees and other persons.

#### 5.2. Periodic risk assessment

Loftice periodically identifies, examines and assesses the corruption risks characteristic of its activities in general and for individual areas in particular.

#### 5.3. Adequate anti-corruption measures

Loftice conducts corruption prevention measures that reasonably respond to the risks identified.

#### 5.4. Counterparty check

Loftice makes reasonable efforts to minimize the risk of business relations with counterparties that may be involved in corrupt activities, for which a check of counterparty tolerance to bribery, incl. checking whether they have their own anti-corruption measures or policies, their willingness to comply with the requirements of this Policy and include anti-corruption conditions (clauses) in contracts, as well as to provide mutual assistance for ethical business and the prevention of corruption.

#### 5.5. Information and education

Loftice places this Policy freely available on the corporate website on the Internet, openly declares opposition to corruption, welcomes and encourages compliance with the principles and requirements of this Policy by all contractors, its employees and other persons.

Loftice contributes to raising the level of anti-corruption culture by informing and systematically educating employees in order to maintain their awareness of the company's anti-corruption policies and mastering the ways and methods of applying anti-corruption policies in practice.

#### 5.6. Monitoring and control

Due to the possible change corruption risks with time and other factors affecting economic activity, Loftice monitors the implemented adequate measures to prevent corruption, controls their observance, and if necessary, revises and improves them.

## **6. GIFTS AND REPRESENTATIVE EXPENSES**

6.1. Gifts that employees on behalf of Loftice may provide to other individuals and organizations, or which employees, in connection with their work at Loftice, may receive from other individuals and organizations, as well as entertainment expenses, including expenses for business hospitality and promotion of Loftice that employees on behalf of Loftice can carry, must simultaneously meet the five criteria specified below:

Be directly related to the legal goals of the Loftice, for example, with the presentation or completion of business projects, the successful execution of contracts, or with national holidays (new year, March 8, February 23, the birthday of the company, the birthday of the contact person from the client side) ;

- ✓ be reasonably justified, proportionate and not a luxury item. The cost of the gift cannot exceed 3500.00 rubles;
- ✓ such expenses should be approved by the General Director of Loftice;
- ✓ such expenses should not constitute a hidden reward for a service, action, inaction, connivance, patronage, granting rights, making a certain decision about a transaction, agreement, permission, etc. or attempt to influence the recipient with a different illegal or unethical purpose;
- ✓ such expenses should not create reputational risk for Loftice, employees and other persons in case of disclosure of information on gifts or hospitality;
- ✓ such expenses should not contradict the principles and requirements of this Policy, the Code of Business Conduct, other Loftice internal documents and applicable laws.

6.2. No gifts are allowed on behalf of Loftice, its employees and representatives to third parties in the monetary form, both cash and non-cash, regardless of currency.

## **7. PARTICIPATION IN CHARITABLE ACTIVITIES**

7.1. Loftice can decide to participate in charity events aimed at creating the image of the organization as a socially responsible business. At the same time, the budget and the plan for participation in the event should be approved by the General Director of Loftice.

## **8. PARTICIPATION IN POLITICAL ACTIVITIES**

8.1. Loftice does not finance political parties, organizations and movements in order to gain commercial advantages in specific Loftice projects.

## **9. INTERACTION WITH PUBLIC EMPLOYEES**

9.1. Loftice refrains from paying any expenses for civil servants and their close relatives (or in their interests) in order to gain commercial advantages in specific Loftice projects, including expenses for transportation, accommodation, food, entertainment, PR campaigns etc.

## **10. INTERACTION WITH EMPLOYEES**

10.1. Loftice requires all the employees to comply with this Policy, informing them of the key principles, requirements and sanctions for violations.

10.2. Loftice organizes safe, confidential and accessible means of informing Loftice management (hotline) on the facts of bribery on the part of persons providing services in the interests of a commercial organization or on behalf of it. Suggestions for improving anti-corruption measures and control, as well as requests from employees and third parties can be sent through the "hotline" ([help@loftice.ru](mailto:help@loftice.ru)).

10.3. In order to form an appropriate level of anti-corruption culture with new employees, an introductory training on the provisions of this Policy and related documents is provided to all the employees.

10.4. Loftice conducts special trainings for employees holding certain positions, performing functions with a high degree of corruption risks, or participating in certain anti-corruption measures. The purpose of such training is to master each employee's techniques and skills to use anti-corruption policies and activities in practice.

10.5. Compliance by the Loftice employees with the principles and requirements of this Policy is taken into account when forming a pool for promotion to higher positions, as well as when imposing disciplinary actions.

## **11. INTERACTION WITH MEDIATORS AND OTHER PERSONS**

11.1. Loftice employees are prohibited from engaging or using intermediaries, partners, agents, joint ventures or other persons to perform any actions that contradict the principles and requirements of this Policy or the norms of applicable anti-corruption legislation.

11.2. In order to fulfill the principles and requirements stipulated in the Policy, Loftice includes the anti-corruption conditions in contracts with intermediaries, partners, agents and other persons. Anti-corruption conditions should contain information about the Policy and the system of anti-corruption measures operating in Loftice, if necessary,



provide for the Policy as an annex to contracts, determine the responsibility of counterparties for non-compliance with the principles and requirements of the Policy.

## **12. MAINTENANCE OF ACCOUNTING BOOKS AND RECORDS**

12.1. All financial transactions must be accurately, correctly and with a sufficient level of details reflected in the accounting of Loftice, displayed in the documents and available for inspection.

12.2. Loftice has appointed employees who are responsible, as stipulated by the current legislation of the Russian Federation, for the preparation and submission of complete and accurate financial statements in accordance with the applicable laws.

12.3. Distortion or falsification of Loftice financial statements is strictly prohibited and regarded as fraud.

## **13. NOTIFICATION OF POLICY DISADVANTAGES**

13.1. Any employee or other person in case of doubts about the legality or compliance with the goals, principles and requirements of the Policy of their actions, as well as actions, omissions or suggestions of other employees, contractors or other persons who interact with Loftice, can report this to e-line Loftice ([help@loftice.ru](mailto:help@loftice.ru)), or to his immediate supervisor, who, if necessary, will provide recommendations and clarifications regarding the situation.

## **14. DISCLAIMER OF RESPONSES AND SANCTIONS**

14.1. Loftice claims that no employee will be subject to sanctions (including dismissed, demoted, deprived of bonuses) if he reports an alleged corruption, or if he refuses to give or receive a bribe, commit a commercial bribery or mediate bribery, including if, as a result of such a refusal, Loftice had lost profit or did not gain commercial and competitive advantages.

## **15. AUDIT AND CONTROL**

15.1. Loftice regularly conducts internal and external audits of financial and economic activities, controls the completeness and accuracy of the data in the accounting records and complies with the requirements of applicable legislation and Loftice internal regulations, including the principles and requirements established by this Policy.

15.2. As part of the internal control measures at Loftice, key business activities are checked, including random checks of the legality of payments made, their economic feasibility, the



appropriateness of expenses, including confirmation of primary accounting documents and compliance with the requirements of this Policy.

## **16. MAKING CHANGES**

16.1. If you identify insufficiently effective provisions of this Policy or Loftice anti-corruption measures associated with it, or if the requirements of the applicable legislation of the Russian Federation change, General Director of Loftice organizes the development and implementation of an action plan for the revision and amendment of this Policy and / or anti-corruption measures.

## **17. RESPONSIBILITY FOR THE FULFILLMENT (NON-PROPER PERFORMANCE) OF THE PRESENT POLICY**

17.1. The General Director and the employees of all departments of Loftice, regardless of their position, are responsible, as provided for by the current legislation of the Russian Federation, for observing the principles and requirements of this Policy, as well as for actions (inaction) of persons subordinate to them that violate these principles and requirements.

17.3. Persons guilty of violating the requirements of this Policy may be brought to disciplinary, administrative, civil or criminal liability on the initiative of Loftice, law enforcement agencies or other persons in the manner and on the grounds provided for by the legislation of the Russian Federation, the Charter of Loftice, local regulations and employment contracts.