



**APPROVED**  
by Order No 2compl-3/22 of the General Director of  
**EXPO FUSION LLC**  
of 24 October 2022

**Anti-corruption Policy**  
**EXPO FUSION LLC**

## 1. INTRODUCTION

### 1.1. The scope of the Policy

This anti-corruption policy (the “Policy”) applies to EXPO FUSION LLC (“EXPO FUSION” or the “Company”), the General Director of EXPO FUSION, all of the employees of EXPO FUSION and other persons who can act on EXPO FUSION’s behalf (the “employees”).

This Policy is aimed at precluding, preventing and combating corruption offences in EXPO FUSION’s activity and at ensuring that the General Director of EXPO FUSION, the employees of EXPO FUSION and other persons that can act on EXPO FUSION’s behalf as well as EXPO FUSION’s contracting parties comply with the provisions of current anti-corruption legislation.

### 1.2. The purpose of the Policy

The Policy reflects EXPO FUSION’s commitment to high ethical standards and principles of conducting business in an open and honest manner as well as EXPO FUSION’s striving to improve the corporate culture, and to maintain EXPO FUSION’s business reputation at an appropriate level.

The Policy explains the obligation of each employee of EXPO FUSION to strictly comply with the applicable legal standards, as well as EXPO FUSION’s determination to preclude, prevent and combat any corruption offences.

Intolerance of corruption means that any persons acting for or on behalf of EXPO FUSION are strictly prohibited from participating, directly or indirectly, in person or through intermediaries, in acts of corruption.

All of the employees of EXPO FUSION, regardless of their position, length of service, status and other relationships with EXPO FUSION should unconditionally and at all times comply with the requirements of applicable legislation and of internal regulatory and administrative documents.

EXPO FUSION prefers cooperation with business partners who share the same values as EXPO FUSION. With a view to making good on the above statement, EXPO FUSION exercises due care when engaging contracting parties and communicates the requirements of this Policy to them.

All financial and business operations and transactions are booked in the accounting and tax records accurately, correctly and in a sufficient level of detail. Such operations and transactions are documented and are available for checking in accordance with the statutory procedure.

EXPO FUSION does not allow business transactions to be performed without such transactions being reflected in the accounting and tax records. Neither does EXPO FUSION allow information in the accounting, tax, management and other types of records or in the supporting documents or reports to be distorted or falsified.

The objectives of this Policy are:

- to develop and implement measures for preventing and eliminating (mitigating) the causes and conditions that give rise to corruption;

- cultivate intolerance of any corrupt practices among the employees of EXPO FUSION;

- establish an obligation of the employees of EXPO FUSION to comply with the requirements set out in this Policy and ensure that the employees of EXPO FUSION are held liable for breaching the above requirements.

### 1.3. Terms and Definitions

- **“Corruption”** means an abuse of an official position, offering and receiving a bribe, an abuse of powers, commercial bribery or an individual using his/her official position in any other unlawful manner contrary to the lawful interests of the company and of the state for the purpose of obtaining a benefit in the form of money, valuables, other property or property-related services, other property rights for him/herself or for third parties, or other individuals unlawfully providing such a benefit to the specified individual. Corruption also involves the specified actions being performed for or on behalf of a legal entity.
- **“Compliance”** means the activity of the Company and of the company’s employees being in line with the requirements of international, Russian and, if the activity is carried out outside of the Russian Federation, applicable foreign legislation, as well as internal regulatory and administrative documents and decisions of the company’s management bodies.
- **“Compliance risks”** means risks of losses including lost profit resulting from a conflict of interests and from employees’ actions being at variance with internal and external regulations.
- **“Counterparty”** means any Russian or foreign legal entity or individual with which / whom the Company enters into contractual relationships, except for employment relationships.
- **“Conflict of interests”** means a situation when a personal interest (whether direct or indirect) of a person holding a position which presupposes an obligation to take measures to prevent and settle conflicts of interests affects or may affect the performance by such person of his or her job (official) duties (or the exercise of his or her powers) in a proper, objective and impartial manner.
- **“Personal interest”** means the possibility of a person specified above and/or of such person's close blood or legal relatives (parents, spouses, children, brothers, sisters as well as brothers, sisters, parents and children of spouses and spouses of children), individuals or organisations with which the specified person and/or such person's close blood or legal relatives are in property, corporate or other close relationships, receiving income in the form of money or other property including property rights, property-related services, results of work performed or any other benefits (advantages).

## **2. RULES OF CONDUCT TO BE COMPLIED WITH WHEN ACCEPTING AND OFFERING GIFTS**

### **2.1. General provisions**

EXPO FUSION determines the principal rules and restrictions in the area of receiving / giving gifts and partaking of / showing hospitality, including criteria of permitted and non-permitted gifts, as well as the occasions for accepting / giving them. Any non-permitted gifts must be rejected / returned to the giver when given.

The acts of giving and receiving business gifts, showing and partaking of hospitality, as well as bearing any entertainment expenses on behalf and/or in the interests of EXPO FUSION and its employees must meet the following criteria:

- not be performed with a view to exercising influence on the adoption of decisions affecting the activities of EXPO FUSION by a person receiving a business gift, partaking of hospitality or participating in events financed using hospitality expenses;
- not stipulate any obligations to the giver and/or not represent a payment for a service supplied or for work performed;
- be reasonable, commensurate and not be a luxury item;
- not create any risk for the reputation of EXPO FUSION, its employees and other persons if information about the gifts or hospitality expenses becomes public;
- not contradict the requirements of applicable legislation, the Anti-corruption Policy and other internal regulations of the Company.

### **2.2. Acceptable gifts**

#### **2.2.1. Souvenirs**

The term “corruption” does not apply to souvenirs and ordinary gifts that cost no more than RUB 3,000 (three thousand) if the person providing them does not expect and cannot reasonably expect the person receiving such souvenir or gift to make any decision in violation of statutory provisions or prohibitions and the person receiving such souvenir or gift also does not think and has no grounds to think that an attempt is being made to inappropriately influence his/her conduct. Therefore, the position and the circumstances of the activity of the person providing the gift and of the person receiving the gift should be taken into account.

This means, for example, that it is allowed to accept and provide souvenirs, such as ballpoint pens, calendars and other mass-production items as well as promotional souvenirs which usually bear an advertising logo of the company providing such item and which cost no more than RUB 3,000 (three thousand). It is also allowed to accept and provide tokens of appreciation when meetings are held at the office of the company handing over such a token of appreciation or when exhibitions are organised. The above ordinary gifts also include tickets to events, including free-of-charge one-day tickets to events at EXPO FUSION, that cost no more than RUB 3,000 (three thousand).

The cost of each souvenir accepted or provided in the sense specified above should not in any case exceed RUB 3,000 (three thousand). If the cost of souvenirs accepted and provided accumulates in business relationships so that there is an impression that an attempt is being made to circumvent the rules set out in this subclause, such gifts cannot be treated as souvenirs in the sense given in this subclause.

#### **2.2.2. Invitations**

It is allowed to invite business partners, or to accept invitations from business partners, to lunch at a restaurant and/or to a similar event if this facilitates the business relationships and the cost of the lunch and/or the event does not exceed RUB 3,000 (three thousand) per each

invited person. Such invitations should be as frequent as is necessary for the business purpose of contacting the business partner.

Gifts are permissible if their cost does not exceed RUB 3,000 (three thousand), if they are provided other than for a business purpose and if they do not contain any other conflict of interests with EXPO FUSION's objectives and obligations. Such gifts may include, in particular, souvenirs, tokens of appreciation and participation in entertainment events as part of private relationships. "Private" relationships in this context should be deemed to mean all relationships that are established and/or maintained outside of cooperation with EXPO FUSION between an employee of the Company and/or an employee of a contracting party, or a government/municipal official or employee. This means that such relationships either were already in existence before the company employed the employee/the state or municipal official or employee was appointed, or have been established outside and independently of business contacts.

### **2.3. A prohibition on accepting and providing gifts**

It is strictly prohibited to provide gifts to persons holding public offices in the Russian Federation and in the constituent entities of the Russian Federation, to persons holding municipal offices, to government and municipal employees, to employees of the Bank of Russia in connection with the office they hold or in connection with the official duties they perform, regardless of the cost of such gifts, including if it exceeds RUB 3,000 (three thousand). These gifts are not allowed at any time.

Gifts in monetary form are not allowed regardless of the amount. Such gifts may not be provided or accepted. In addition, loans or securities, deferrals of debts or waivers of claims are treated as monetary gifts. This provision applies to the granting of gifts to the employee's relatives as well as to any form of participation in the relevant processes. Relatives of the employee include close family members, spouses and other persons with whom the employee has personal or family relationships.

Gifts are prohibited if they are provided by or to one of the parties to negotiations and tenders, regardless of the form of such negotiations or tenders, where the gifts may create an impression of a bad-faith agreement.

All other gifts that are prohibited to be given or received under Russian legislation are not permitted.

### **2.4. Approval procedure**

If there are any doubts as to whether it is permitted to accept or provide a gift, an employee should inform his or her manager with a view to checking whether such gift is in line with this Policy and obtaining permission to accept or provide the gift.

Therefore, a general prohibition is imposed on accepting and/or providing gifts without providing information about the gift to the company and agreeing the gift with the Company through the line manager. The above procedure guarantees that corporate transparency will allow the provision and acceptance to be initially avoided of gifts that are dubious in terms of the law and corporate rules. Moreover, informing the manager guarantees that the event will be documented. Providing information about the gift together with issuing a permission for the gift in repeated situations of the same type that involve gifts is one procedure that does not require information to be provided and permissions to be obtained on multiple occasions. A manager in the sense set out in this clause is the line manager of the relevant employee who can contact the person responsible for preventing corruption and other offences.

The line manager and/or the person responsible for preventing corruption and other offences should be informed before the proposed provision and, if possible, acceptance of the

gift. If information cannot be provided in advance owing to circumstances, information about a gift may be provided as soon as possible.

### **3. DEALING WITH CONTRACTING PARTIES**

EXPO FUSION carries out due diligence based on an assessment of risks with respect to each proposed business partner (contracting party). Due diligence is conducted before entering into contractual relationships and from time to time during contractual relationships with a business partner. Due diligence of a business partner includes, without limitation, checking whether the business partner has legal capacity/legal competence, with a view to assessing whether the partner is a good-faith legal entity/individual performing his/her/its actions on legal grounds, who/that is solvent and authorised to carry out the relevant business activity or to enter into the relevant transactions.

Due diligence of a business partner should be carried out taking into account compliance risks relating to the nature of the business partner's activity.

Due diligence of a business partner should take into account and assess at the very least the following:

- the business model, the country, the owner, the organisational structure and the known methods of doing business;
- the business partner's business reputation, based on confirmed information;
- the business partner's qualifications;
- the business partner's structure;
- the history of the business partner's activity;
- connections with the state authorities, organisations and officials;

EXPO FUSION obliges its employees to take measures: to prevent a conflict of interests and to settle conflicts of interests that arise; to prevent a personal interest that results or may result in a conflict of interests from interfering with the performance of job duties; and to inform their line managers and the person responsible for preventing corruption and other offences of an actual or potential conflict of interests as soon as employees become aware of the above.

As soon as an employee of EXPO FUSION becomes aware of an actual or potential conflict of interests, he/she is obliged to inform, in writing, his/her line manager and the person responsible for preventing corruption and other offences, who, in turn, will take measures to prevent or settle the conflict of interests. The employee may also contact the hotline pursuant to clause 6.4 of this Policy.

Preventing or settling a conflict of interests may involve changing the job or official position of the person who is a party to the conflict of interests up to suspending him/her from performing his/her job (official) duties in accordance with the established procedure, and/or such person refusing the benefit that has caused the conflict of interests.

If an employee of EXPO FUSION has not taken the relevant measures to prevent or settle a conflict of interests, this is considered to be an offence that entails the dismissal of such employee under Russian legislation.

When a violation of anti-corruption legislation is identified, EXPO FUSION communicates with the law enforcement authorities with respect to matters involving liability being imposed on persons who are guilty of corruption and other offences.

### **4. TRAINING AND EDUCATION**

After this Policy is brought into force all of the employees should study the provisions of this Policy in order to apply this Policy correctly to prevent corruption.

EXPO FUSION also holds training events of a special (targeted) nature. In such cases, training is provided to employees holding specific positions whose labour functions are associated with a high level of corruption risks. The purpose of the training is that each employee should master the methods and skills to correctly implement the anti-corruption Policy and its procedures in practice.

### **5. THE PERSON RESPONSIBLE FOR PREVENTING CORRUPTION AND OTHER OFFENCES**

EXPO FUSION appoints a person responsible for preventing corruption and other offences.

The purpose of the activity of the person responsible for preventing corruption and other offences is to register all information about possible violations of the law or the Policy relating to corruption, and to process and structure such information.

The person responsible for preventing corruption and other offences organises training events to prevent corruption and other offences.

The person responsible for preventing corruption and other offences shall guarantee confidentiality when processing information.

### **6. THE RIGHTS OF PERSONS REPORTING AN OFFENCE (INFORMERS) AND PERSONS ACCUSED OF AN OFFENCE. THE CORRUPTION AND BAD-FAITH CONDUCT HOTLINE.**

#### **6.1. Protection of informers**

Employees should not be put at a disadvantage owing to information that they provide in good faith. The above also applies to situations where the information is recognised as being ungrounded.

Confidentiality that is requested by informers whose names and surnames are known is guaranteed to the extent allowed by the law, unless it is necessary and/or the law requires that the name and surname should be disclosed for the purposes of an investigation, or the informer may be accused of punishable actions for providing information that is known to be inaccurate (defamation, etc.).

#### **6.2. Informing a suspect and an accused person**

EXPO FUSION informs employees who are suspected and who are accused of an offence about an investigation and the results of it as well as about data stored in connection with an investigation that has been conducted, unless the law prohibits the provision of the relevant information and unless the provision of such information may undermine the investigation being conducted.

Information about the name of the informer is provided further to a written request from an employee suspected or accused of an offence and only if the informer may be accused of punishable actions, since information that is known to be inaccurate has been provided.

#### **6.3. A waiver of measures and sanctions in response**

No employee will be subject to sanctions (dismissed, demoted, deprived of a bonus, etc.) if he/she has reported an alleged case of corruption or if he/she has refused to offer a bribe, commit commercial bribery or be an intermediary in bribery, which includes cases when such refusal has resulted in EXPO FUSION losing profit or being deprived of commercial and competitive advantages.

### **6.4. The corruption and bad-faith conduct hotline**

The Company establishes a corruption and bad-faith conduct hotline. If an employee of the Company wishes to anonymously or openly report an alleged case of corruption, unethical or bad-faith conduct of other employees of the Company or third parties that harms the Company, as well as cases of solicitation of a bribe, commercial bribery or corporate fraud, such employee may send an email describing the facts that have become known to him/her or well-grounded suspicions to the following email address [hotline@pgplaw.ru](mailto:hotline@pgplaw.ru) to be examined by a legal advisor (the “Attorney”) that has an agreement with the Company for such applications to be examined in an independent, objective and confidential manner. The Attorney guarantees that all information reported via the hotline will be subject to attorney-client privilege.

### **7. MAKING AMENDMENTS**

If provisions of this Policy are identified that are insufficiently effective or if the requirements of applicable Russian legislation change, EXPO FUSION’s General Director will arrange for a plan of actions to be developed and implemented in order for this Policy to be revised and amended.

### **8. LIABILITY FOR NON-COMPLIANCE (IMPROPER COMPLIANCE) WITH THIS POLICY**

The employees of all business units of EXPO FUSION, regardless of the position they hold, are liable for violating anti-corruption legislation for which provision is made under current Russian legislation. EXPO FUSION is guided by the principle of certainty of punishment for employees of the Company for a corruption offence, irrespective of the position held by the employee and also the methods, form and extent of such offences.

Persons guilty of violating the requirements of anti-corruption legislation may be subject to established legal liability at the initiative of EXPO FUSION, law-enforcement authorities or other persons in accordance with the procedure and on the grounds for which Russian legislation provides.

EXPO FUSION may carry out internal checks within the limits permitted by Russian legislation in the case of each substantiated suspicion or established fact of corruption.

### **9. FINAL PROVISIONS**

A decision to approve this Policy and a decision to amend and supplement this Policy as well as a decision to cancel it is passed by an order of the Company’s General Director.

This Policy comes into force on the date when it is adopted and remains in force at all times until it is cancelled.