
APPROVED
by the Board of Directors
of PJSC SIBUR Holding
Minutes No. 232 dated 17 December 2020

The Code of Business Conduct of counterparty of SIBUR LLC and PJSC SIBUR Holding Enterprises
(Version No. 1)

Tobolsk
2020

The Code of Business Conduct of Counterparty defines the requirements on corporate social responsibility of the counterparties of SIBUR LLC and PJSC SIBUR Holding Companies (hereinafter the Company and/or PJSC SIBUR Holding Companies) and of other organizations which enter into business relations with the Company.

Article 1. General Provisions

- 1.1 The Code of Business Conduct of Counterparty (hereinafter, the Code) defines the requirements to corporate social responsibility of the counterparties of SIBUR LLC and PJSC SIBUR Holding Companies (hereinafter the Company and/or PJSC SIBUR Holding Companies) and of other organizations which enter into business relations with the Company (hereinafter, the Counterparty).
- 1.2 The Company and PJSC SIBUR Holding Companies support principles of cooperation with Counterparties such as transparency, information openness, competitiveness, fairness, efficiency, fair competition.
- 1.3 The Company and PJSC SIBUR Holding Companies value their reputation and seek confidence-building on behalf of the business community.
- 1.4 The Company and PJSC SIBUR Holding Companies seek cooperation with Counterparties with flawless reputation, strict compliance with the law and with the universally recognized standards of corporate ethics and business conduct, respect for human rights, care about their employees' health and occupational safety, and are committed to the principles of sustainable development.
- 1.5 The Company and PJSC SIBUR Holding Companies maintain open and transparent business relations with all Counterparties and strive for their development on a mutually beneficial basis.
- 1.6 The Company and PJSC SIBUR Holding Companies expect that the Counterparties shall adhere to high ethical standards and refuse from any activity which may be perceived as violation of such standards.
- 1.7 The Company and/or PJSC SIBUR Holding Company shall provide for including the provisions assuring the adherence to this Code into the agreements and contracts executed with the Counterparties. The disagreement of a Counterparty with the provisions of this Code shall not impede cooperation, however, the Company and/or PJSC SIBUR Holding Company shall assess the respective risks when making a decision on executing a contract with such Counterparty.
- 1.8 If the Company and/or PJSC SIBUR Holding Company become aware of any actions or circumstance not being in compliance with the Code, this shall constitute the grounds for claiming relevant corrective actions stipulated by the contracts executed with the Counterparties to the extent of termination.

Article 2. Scope

- 2.1. In cases stipulated by the contracts, this Code shall apply to all Counterparties.
- 2.2. In the course of interaction with the Company and/or PJSC SIBUR Holding Companies and their employees, Counterparties shall abide by the requirements of this Code.

Article 3. Terms. Definitions. Abbreviations

- 3.1. **Procurement** – cumulative action targeted at acquisition of materials and resources / services / work for the purpose of satisfying the needs of the Management Organization / Company / Asset on reimbursable payment terms under the executed civil contract / agreement.
- 3.2. **Insider information** – specific and accurate information which was not provided or disseminated earlier (including the information constituting commercial / banking / business secret, secret of communication [data about money transfer] and other secrets protected by law), the provision or dissemination of which may have a significant effect on the value of financial instruments, goods and/or foreign currency.
- 3.3. **Confidential information** – information of actual or potential commercial value due to not being known to third parties, not being legitimately available and due to the owner of this information undertaking measures to protect its confidentiality.
- 3.4. **Conflict of interest** – any situation or circumstances, when personal interests or activities of an employee and/or his/her close relatives impede or may impede the employee to act in the interests of the Company and/or PJSC SIBUR Holding Company in good faith, honestly and without bias, to effectively perform his/her duties.
- 3.5. **Corruption** – malpractice, giving or accepting bribes, abuse of power/authority, trading in influence or any other illegal use of the job position by a natural person against lawful interests of the Company and the state with the purpose of obtaining benefit in the form of money, valuables, other property or monetized services, other ownership rights for himself/herself or for third parties; or illegal provision of such benefit to the above-mentioned natural person by other natural persons, as well as performing the above-listed actions on behalf or in the interest of the Employer.
- 3.6. **Money laundering (illegal income laundering)** – performing financial transactions and other transactions with cash or other assets knowingly acquired by other persons using criminal means for the purpose of giving a veneer of legality of ownership, use and disposal of the above-mentioned cash or other assets.

Article 4. Compliance with the Law and Other Regulations in the Course of Business

The Company and PJSC SIBUR Holding Companies expect that their Counterparties will conduct their business with respect for and abidance by the requirements of effective law, international standards and documents (the Declaration of Human Rights, the United Nations Global Compact, the International Labor Organization Declaration on Fundamental Principles and Rights at Work) and other rules and regulations.

Article 5. Ethic Conduct of Business

- 5.1. The Company and PJSC SIBUR Holding Companies are strongly committed to the principles of fair competition and market openness, and strive for providing equal opportunities to all their potential Counterparties.
 - 5.2. In case of available opportunity and competitive environment, the Company and/or PJSC SIBUR Holding Companies shall select their Counterparties on a competitive basis. Assurance of fair competition is the key principle of selecting the Counterparties. The decisions on selecting a Counterparty shall be based on such objective criteria as commercial and technical terms and conditions, quality of goods/services, the Counterparties' experience and qualifications, the goods/services corresponding with the specifications of the Company and/or PJSC SIBUR Holding Companies, as well as the Counterparties' reliability.
 - 5.3. In turn, the Counterparty undertakes to comply with the rules of the tender for goods/work/services and to abide by the ethic standards in the procurement process. The Counterparties participating in the procurement/tender shall be forbidden to share information about the prices and
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other terms and conditions, which can impact the selection of the winner, to perform any actions restricting competition including collusion, price agreements and business intelligence.

Article 6. Counteracting Corruption

- 6.1. Zero tolerance of all corruption manifestations was established and is maintained in the Company and PJSC SIBUR Holding Companies. The Company and PJSC SIBUR Holding Companies strive for developing comprehensive measures to verify the information about possible corruption-related violations, and in case of its confirmation – to eliminate (mitigate) their consequences and causes.
- 6.2. The agreements/contracts of the Company and PJSC SIBUR Holding Companies shall contain an anti-corruption clause about the need for the Counterparties to comply with all the applicable laws and regulations against corruption, money laundering and terrorism financing during their performance under the respective agreements/contracts.
- 6.3. The Company and PJSC SIBUR Holding Companies strive for maintaining and developing relations with the Counterparties performing in compliance with high ethical standards and implementing anti-corruption practices in accordance with Article 13.3 of the Federal Law “On Counteracting Corruption” and applicable international anti-corruption standards.
- 6.4. In its turn, the Counterparty undertakes not to perform actions qualified by the applicable law as giving or taking bribes (bribery facilitation), trading in influence (solicitation of bribery or trading in influence), abuse of powers/authorities, as well as any actions in breach of the applicable laws and international documents on counteracting money laundering and terrorism financing.

Article 7. Rights and Freedoms

- 7.1. The Counterparties shall respect and support the protection of universally recognized human rights and freedoms and guarantee that they are not involved in their violations. The attitude towards all employees of the Counterparty should be respectful and decent.
- 7.2. The Counterparties undertake to rule out any form of discrimination.
- 7.3. The Counterparty undertakes not to engage individuals aged under 16 in labor, except for cases permitted by the Russian Labor Code.
- 7.4. The Counterparty shall abide by the applicable law regulating the working hours duration for Employees.
- 7.5. The Counterparty shall pay the Employees their salary and overtime payments due at least at the level required by applicable law. The Counterparty shall provide employees with clear pay-slips for each payment period indicating the number of the hours/days worked, the effective salary amount or piece-rate, as well as the grounds for the performed withholdings.
- 7.6. The Counterparty shall not have the right to use corporal punishment, to offer violence or to allow for other forms of psychological or physical enforcement against its employees.
- 7.7. Within the limits set by the law, the Counterparty undertakes to recognize and respect the right of employees to establishing trade unions and executing collective agreements. Under any circumstances, Employees shall have the possibility to openly express their claims to the management and to file complaints without fear of response punitive actions and penalties.

Article 8. Conflict of Interest Management

The Counterparty undertakes to avoid any Conflict of Interest and to notify the Company and PJSC

SIBUR Holding Companies accordingly. Should any employee of the Company and/or PJSC SIBUR Holding Company have personal interest impeding his/her performance in the interests of the Company and/or PJSC SIBUR Holding Company, performing his/her duties with respect to the Counterparty in good faith, honestly and without bias, or in case he/she has any economic ties with the Counterparty, the information about the identified breaches shall be sent using the following communication channels:

- hotline website: <https://sibur.deloitte-hotline.ru>,
- email: sibur-hotline@deloitte.ru,
- toll-free telephone number: +7 (800) 500-08-74.

Article 9. Reward, Gifts and Financial Incentives

- 9.1. The Counterparty shall refuse from providing any financial incentives to employees of the Company and PJSC SIBUR Holding Companies including by way of cash payments, gifts, gratuitous provision of work/services and in other ways not listed herein, which will make the employee dependent on the Counterparty and may be leveraged for assuring the performance of this employee to the benefit of the party providing such incentives.
- 9.2. The following actions shall be qualified as the employee's performance to the benefit of the party providing incentives:
- provision of unjustified preferences versus the other Counterparties;
 - provision of any guarantees;
 - facilitation (by-passing) of the existing procedures;
 - other actions performed by the employee within his/her job duties, but contradicting the principles of transparency and openness in relations with the Counterparties.

Article 10. Confidential and Insider Information

- 10.1. The Counterparty undertakes to respect the intellectual property of the Company and PJSC SIBUR Holding Companies, their commercial secrets and any other confidential, insider or classified information. Under any circumstances, the Counterparty shall view any information or data on transactions of the Company and PJSC SIBUR Holding Companies as confidential unless such information becomes public. The Counterparty undertakes to protect the confidentiality of information by way of refusing from its transfer, publication, use or disclosure beyond its usual business or without instructions/permission from the Company and PJSC SIBUR Holding Companies.
- 10.2. The Counterparty undertakes to abide by the applicable data protection standards. The Counterparty shall store the materials containing confidential and insider information or requiring protection under the data protection standards in a safe place without possible access by any third parties and provide them to its employees on the need-to-know basis only.

Article 11. Occupational Health and Industrial Safety

- 11.1. The Company and PJSC SIBUR Holding Companies declare the principle of zero tolerance of violations in the sphere of occupational health and industrial safety. All injuries, incidents and accidents of the Counterparty working in the territory of the Company and PJSC SIBUR Holding Companies, as well as near misses shall be investigated.
- 11.2. The Company and PJSC SIBUR Holding Companies expect from the Counterparty abidance by the occupational health and industrial safety standards, creation of a healthy working environment and safe labor conditions for all its employees. The Counterparty shall integrate the standards and
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practices of health and safety management into its own business, and shall abide by contractual provisions.

- 11.3. The Counterparty operating on the site or in the territory of the Company and PJSC SIBUR Holding Companies undertakes to abide by the occupational health and industrial safety standards adopted in the Company and/or PJSC SIBUR Holding Companies.

Article 12. Environmental Protection

- 12.1. The Company and PJSC SIBUR Holding Companies are committed to environmental protection liabilities; responsibility for the abidance by the environmental laws and regulations is the key principle of our activities.
- 12.2. The Company and PJSC SIBUR Holding Companies strive for cooperation with the counterparties that share this commitment in the sphere of environmental protection and intend to minimize the negative environmental footprint.
- 12.3. The Counterparty shall abide by the environmental laws and regulations, strive to improve environmental sustainability of its operations by way of monitoring and controlling the environmental aspects, minimizing the negative environmental impact.

Article 13. Responsibility

The Company and PJSC SIBUR Holding Companies reserve the right to immediate suspension or termination of the contract with any Counterparty at their own discretion and within the procedure stipulated by the contract/agreement between the Counterparty and the Company and PJSC SIBUR Holding Company.

Article 14. Reporting Violations

- 14.1. The Counterparty undertakes to report any cases of real or alleged violations of the provisions of this Code. The Counterparty undertakes to provide bona fide assistance and support to the Company and PJSC SIBUR Holding Companies in case of real or alleged violations of the provisions of this Code, including provision of opportunities to interview its officers, employees and agents.
- 14.2. The Counterparty may notify about its suspicions with respect to violation of the Code provisions or about other concerns related to finance, accounting, audit, corruption or fraud in the Company and/or PJSC SIBUR Holding Companies, or about other serious situations affecting material interests using the e-mail address compliance@sibur.ru or the independent Hot Line using one of the following communication channels:
- hotline website: <https://sibur.deloitte-hotline.ru>,
 - email: sibur-hotline@deloitte.ru,
 - toll-free telephone number: +7 (800) 500-08-74.

Article 15. Final Provisions

Any changes, additions and amendments to this Code shall be subject to approval by the Board of Directors of PJSC SIBUR Holding.
