

CLAIMS AND OBJECTIVES OF THE ANTIMONOPOLY POLICY

1.1. The Antimonopoly Policy of the PJSC "M.Video" and "M.Video" Group (hereinafter referred to as the "Company") is an integral part of its business strategy and aims to ensure the compliance of the Management and Employees of the Company with the requirements of Antimonopoly Legislation when the Company:

APPROVED
By the Board of Directors
of the PJSC «M.video»
(Board Minutes №113/2016 dated 15.09.2016)

1.2. The aims of the Policy are:

Chairman of the Board of Directors

• to ensure that the employee of the Company do not have any conflicts of interest with the Company and its employees in any activity which is prohibited by Antimonopoly Legislation, as well as the measures and procedures applied by the Company;

 /John Coleman/

• to provide information to the Employees of the Company on their liability for any violation of Antimonopoly Legislation;

• to ensure that the personnel of the Company and its employees do not engage in any activity which is prohibited by Antimonopoly Legislation.

1.3. The effect of the Antimonopoly Policy is to ensure that the Management and all Employees of the Company, regardless of the position they hold:

1.4. The effect of the Policy shall:

• be in accordance with the goals and objectives of Antimonopoly Legislation and the Antimonopoly Policy;

• be subject to the Antimonopoly Legislation and the Antimonopoly Policy;

• be immediately applied to the Management and Employees of the Company, which could potentially lead to a violation of Antimonopoly Legislation;

• immediately ensure the Responsible Status of the Company in accordance with Antimonopoly Legislation.

1.5. The Management shall immediately inform the Personnel of the Company of any violation of Antimonopoly Legislation and ensure the Employees understand that serious violations will result in disciplinary measures.

2. SCOPE

2.1. Antimonopoly Legislation

2.2. Antimonopoly Legislation

2.3. Antimonopoly Legislation

2.4. Antimonopoly Legislation

1. AIMS AND OBJECTIVES OF THE ANTIMONOPOLY POLICY

1.1. The Antimonopoly Policy of the PJSC “M.video” and “M.video” Group (hereinafter referred to as the "Company") is an internal bylaw whose primary aim is to provide information and ensure the compliance of the Management and Employees of the Company with the requirements of Antimonopoly Legislation when performing their job functions.

1.2. The aims of this Policy are:

- to inform each Employee of the Company of his/her duty to know and comply absolutely with the main principles and rules for compliance with Antimonopoly Legislation set forth herein, as well as the measures and procedures applied by the Company to prevent violations;
- to provide information to the Employees of the Company on their liability for any violation of Antimonopoly Legislation;
- to prevent the participation of the Company and its Employees in any activity which violates Antimonopoly Legislation.

1.3. The effect of the Antimonopoly Policy extends to the Management and all Employees of the Company regardless of the positions they hold.

1.4. The Employees of the Company shall:

- know and comply with the requirements of Antimonopoly Legislation and the Antimonopoly Policy;
- understand that the rules contained in the Antimonopoly Policy are not exhaustive;
- immediately speak to the Responsible Unit in any disputable situation which could potentially lead to a violation of Antimonopoly Legislation;
- immediately inform the Responsible Unit if they detect violations of Antimonopoly Legislation.

1.5. The Management shall demonstrate through personal example their nonacceptance of violations of Antimonopoly Legislation and make the Employees understand that actions which could lead to such violations are inadmissible.

2. KEY TERMS

Antimonopoly Compliance

A system of corporate procedures and bylaws aimed at ensuring the Company's compliance with Antimonopoly Legislation to prevent its violation.

Antimonopoly Legislation

Federal Law No. 135-FZ "On Protection of Competition" dated 26.07.2006, Federal Law No. 38-FZ "On Advertising" dated 13.03.2006, the Code of Administrative Offenses of the Russian Federation, the Criminal Code of the

Russian Federation, and other federal laws, regulations of the Government of the Russian Federation, and regulatory acts of the Federal Antimonopoly Service which govern relations connected with the protection of competition and the prevention and suppression of monopolistic activity and unfair competition, including international agreements of the Russian Federation.

Antimonopoly Agency

The Federal Antimonopoly Service (the FAS of Russia) or its local offices.

Associations

Groups of legal entities of various forms (associations, unions, etc.) which may include the Competitors of the Company as their members.

Government Authority

Any federal executive authority, government authority of a constituent of the Russian Federation, local government authority, or other authorities or organizations performing the functions of the above-mentioned authorities, government non-budgetary funds, and the Central Bank of the Russian Federation.

The Company

M.video Management, LLC, including its all business units, branches and representative offices.

Competitor

Any entity which operates (purchases or sells goods, works, or services) on the same goods market as the Company.

Counterparty

Any entity which plans to enter or has entered into civil law relations with the Company (excluding retail purchasers of products sold by the Company).

Responsible Unit

The Unit/Employees of the Company whose competence includes ensuring the functioning of Antimonopoly Compliance and detecting and preventing violations of Antimonopoly Legislation on the part of the Company and its Employees (the Legal Department of the Company).

Management

Senior officers of the Company, including the

sole executive body of the Company.

Employee

Any natural person who is employed by the Company, including the Management of the Company.

Goods Market

The product and geographical boundaries for the commerce in goods purchased and sold by the Company within which the Company conducts its day-to-day activities.

3. MAIN PRINCIPLES AND SCOPE OF THE ANTIMONOPOLY POLICY

3.1. The main principles of Antimonopoly Compliance and implementation of the Antimonopoly Policy are:

- the autonomy and independence of the Company in the course of its day-to-day activities;
- economic expediency and practicability in the formation and implementation of pricing policy with Counterparties based on the information available to the Company on its share of the Goods Market;
- the inadmissibility of exchanging any confidential data containing information on the prices of Counterparties, planned discounts and bonus offers, conditions for acquiring goods from suppliers, or planned changes in sales or purchase volumes, as well as sales territory, changes in product range, and other data which could lead to a cartel agreement;
- fair practices in cooperation with Competitors and Counterparties, including consumers;
- immediate termination of activities or agreements of the Company with Competitors, Counterparties, or Government Authorities in the event that they lead or could lead to the restriction, elimination or prevention of competition and are not permitted by Antimonopoly Legislation.

3.2. During the Company's interaction with its Competitors, Counterparties, and representatives of Government Authorities, the Management and Employees of the Company shall comply with the provisions of the Antimonopoly Policy and follow its main principles. For reference purposes, the Company places the text of the Antimonopoly Policy, excluding any internal use information, on its official website.

4. ANTIMONOPOLY LEGISLATION

4.1. The main prohibitions and restrictions of Antimonopoly Legislation

Antimonopoly Legislation prohibits, and the Company does not accept:

- 4.1.1. cartel agreements**, namely agreements between Competitors which lead or could lead to price fixing (support), division of the Goods Market according to the structure of sellers or purchasers, reduction or termination of goods manufacturing, refusal to conclude contracts with

certain Counterparties, contracts entered into in writing or orally and, as a rule, kept secret.

4.1.2. anticompetitive agreements between suppliers and purchasers of goods which:

- set a fixed or minimum price at which the purchaser may resell goods;
- prohibit the purchaser from selling goods manufactured by a company which is the seller's Competitor;
- lead to restriction of competition, including by setting obstacles to access to the market, prohibiting the supplier from selling goods to other purchasers, and so on.

4.1.3. anticompetitive coordinated actions, namely

joint actions with Competitors which lead or could lead to price fixing (support), division of the Goods Market according to the structure of sellers or purchasers, reduction or termination of goods manufacturing, refusal to conclude contracts with certain Counterparties, creation of obstacles to access to the market, and so on, which are preceded by a public written or oral statement of one of the participants on the planned actions which is available to general public.

4.1.4. anticompetitive actions which

include abuse of a dominant position by means of fixing monopolistically high and/or low prices, unreasonable refusal to enter into a contract, imposition of disadvantageous conditions of a contract, creation of discriminatory conditions for Counterparties and other consequences provided for by Antimonopoly Legislation, and coordination of economic activity through coordination of Counterparties' actions which leads or could lead to the above-mentioned consequences (see Subclauses 4.1.1. and 4.1.2.).

4.1.5. agreements with Government Authorities which

lead or could lead to the prevention, restriction or elimination of competition, including those causing unfair advantages for the Company in comparison with other market participants or the creation of unfair obstacles for other entities in the course of their business activities.

4.1.6. unfair competition, namely

any actions which are aimed at gaining advantages in the course of business activities if such actions contradict the laws of the Russian Federation, usual business practices, or the requirements of integrity, reasonableness, and fairness, and have inflicted or could inflict losses on Competitors or damage to their business reputation, as well as discreditation of a Competitor (reporting of false, inaccurate, or incorrect information about it), misrepresentation of the goods and services of the Company, improper comparison with a Competitor, illegal receipt, use or disclosure of trade secrets of a Competitor, illegal use of the exclusive rights of a Competitor to intellectual property and means of identification (trademarks, company names, business names), copying corporate style (branded clothes, design of the sales area, and window dressing) of a Competitor, other actions which could be confused with the activities of a Competitor, and so on.

4.2. Powers of the Antimonopoly Agency

The Company knows that as part of Antimonopoly Compliance control the Antimonopoly Agency is entitled to:

- request documents and information from companies;

- check companies for compliance with the requirements of Antimonopoly Legislation (scheduled and unscheduled, documentary and field checks).

During a check, the Antimonopoly Agency may receive access to the companies' premises, documents and information and inspect them. It must be considered that when conducting unscheduled checks for violations of prohibitions on entering into anticompetitive agreements, the Antimonopoly Agency does not notify the company subject to the check in advance;

- open and consider cases on violation of Antimonopoly Legislation, issue decisions, orders, cautions, and warnings, and apply administrative sanctions provided for by Antimonopoly Legislation to violators;
- turn over the materials of cases on violation of Antimonopoly Legislation to law enforcement agencies for initiation of criminal cases.

Any documentation (including official and email correspondence, contracts, minutes of meetings, audio and video records, etc.) may be received by the Antimonopoly Agency when exercising its powers and used as evidence when trying cases on violation of Antimonopoly Legislation.

The Employees shall ensure the proper execution of inquiries of the Antimonopoly Agency and the requirements of the inspectorate during its check. Interaction with the Antimonopoly Agency when submitting inquiries and conducting checks shall be carried out by the Employees together with the Responsible Unit according to the procedure established by the internal rules and regulations of the Company.

4.3. Liability and consequences for violation of Antimonopoly Legislation

The Company knows that Antimonopoly Legislation provides for considerable sanctions for violations both for companies and their employees.

- Administrative liability¹

An administrative fine may be imposed on the Company for violation of Antimonopoly Legislation. The fine amount depends on the particular elements of the established violation and other circumstances and may be up to 15 % of sales revenues for the goods on the market of which such violation was committed (or up to 15 % of expenses for the goods on the market of which such violation was committed).

The Management and Employees of the Company may also be subject to administrative liability in the form of a fine of up to 50,000 rubles or disqualification (prohibition on holding specified posts or engaging in specified activities) for up to three years.

- Criminal sanctions²

For cartel agreements with Competitors, the Management and Employees of the Company may be subject to criminal sanctions, including imprisonment for up to six years.

¹ Articles 14.31-14.33 of the Code of Administrative Offenses of the Russian Federation

² Article 178 of the Criminal Code of the Russian Federation

- Civil liability³

Persons whose rights and interests have been violated as a result of a violation of Antimonopoly Legislation may file lawsuits against the Company with claims for damages.

If a violation is established, the Antimonopoly Agency may also order the Company to take specific actions aimed at eliminating the violation and ensuring competition⁴. Execution of such orders can result in substantial consequences for the Company's activities, including financial consequences.

Furthermore, it must be considered that the establishment of a violation of Antimonopoly Legislation in the activities of the Company and/or its Employees can negatively influence the business reputation of the Company.

The Company may take disciplinary action against Employees who violate the requirements of the Antimonopoly Policy and Antimonopoly Legislation.

5. RULES OF ANTIMONOPOLY COMPLIANCE

5.1. Interaction with Competitors

Employees **should not**:

- enter into negotiations with Competitors, directly or through third parties, and agree orally or in writing on issues of pricing, relationships with Counterparties (suppliers), division of the market by territory or structure of purchasers or sellers, or establishment of barriers to entry or exit from the Goods Market;
- discuss or exchange with Competitors, directly or through third parties, any significant business information, including information on:
 - existing or planned prices, change in prices, the pricing policy or other sales conditions affecting prices;
 - the level of expenses and profit or the volumes of sales and inventory;
 - production and marketing plans;
 - issues related to the terms and conditions of contracts with individual suppliers, purchasers or Competitors;
 - division of the Goods Market according to territory, distribution of purchasers between Competitors, restrictions according to product types or market division in any other form;
- allow economically unreasonable synchronous and uniform actions with the Competitors on price fixing, division of the goods market, or refusal to cooperate with certain counterparties;
- make public statements (including through the media) on the existing or planned actions of the Company so that Competitors would act similarly;

³ Article 37 of the Federal Law "On Protection of Competition", Article 15 of the Civil Code of the Russian Federation

⁴ Articles 23, 50, and 51 of the Federal Law "On Protection of Competition"

- take other economically unfounded actions aimed at following the Competitor's actions when setting prices and making other business decisions.

Employees **should**:

- make business decisions (including those concerning setting prices, sales conditions, production volumes, goods quality, sales markets and territories) at their own discretion and in an economically reasonable way, on the basis of the Company's interests in accordance with job descriptions;
- immediately cease discussion of any matters which conflict with the Antimonopoly Policy;
- inform the Responsible Unit of Competitors' offers to take part in a discussion of matters which conflict with the Antimonopoly Policy;
- use only open data to obtain information on the prices set by a Competitor or other information on the Competitor's activities, for example, data on the official websites of the Competitors (including online shops) or information placed in the business premises of the Competitors, or data of informational and analytical agencies, and public data of Government Authorities;
- consult with the Responsible Unit in the case of questions and/or uncertainties with regard to the permissibility of information exchange, as well as its source or addressee.

5.2. Interaction with suppliers and other Counterparties

Employees **should not**:

- agree to meet the requirements of suppliers to adhere to their minimum or fixed prices for retail sales of goods;
- come to an agreement with suppliers to boycott any other suppliers;
- require suppliers to take actions to coordinate Competitors' activities;
- discuss or agree with any organizations to press goods or services, refuse to cooperate with certain companies, or create obstacles for anyone's business activities on the Goods Market;
- use suppliers and other third parties as a channel for exchange of price information or other commercially important information with Competitors, and not allow the Company to be used as a channel for the exchange of confidential and commercial information between suppliers;
- require suppliers to provide information on Competitors' activities;
- coordinate the economic activities of Counterparties which do not belong to the Company's corporate group and are not the Company's Competitors.

Employees **should**:

- set prices at their own discretion, first of all on the basis of the Company's interests and principles of economic reasonableness;

- speak to the Responsible Unit if conclusion of a contract with an exclusivity clause or a contract with any other restrictions (restrictions according to sales territory, circle of customers, setting prices, etc.) is planned.

5.3. Interaction with Government Authorities

Employees **should not**:

- initiate, discuss or reach agreements with Government Authorities aimed at gaining unreasonable advantages over other companies or creation of obstacles for the activities of other companies.

Employees **should**:

- immediately cease discussion of actions which conflict with the Antimonopoly Policy;
- inform the Responsible Unit of any initiatives or offers of Government Authorities concerning issues which are in conflict with the requirements of the Antimonopoly Policy;
- consult with the Responsible Unit if questions and/or uncertainties arise with regard to the permissibility of interaction with Government Authorities.

5.4. Promotion of the Company and products sold/services provided

Employees **should**:

- spread only complete, accurate, and correct information about the Company and its goods and services;
- refrain from spreading information on Competitors or their goods and services if such information has no objective confirmation and contains a negative evaluation of the Competitors' actions;
- spread information on the advantages of the Company and its goods and services or compare the Company and its goods and services with the Competitors and their goods and services based on only true, accurate, and correct benchmarks and reliable confirmation sources;
- refrain from any use of the trademarks and means of identification of the Competitors.

5.5. Rules of business communication and membership in the Associations

Employees **should not**:

- use words and phrases in documents and correspondence (internal and external) (including in an informal manner) which could subsequently be ambiguously interpreted (including as an evidence of the Company's participation in a prohibited agreement) during a check by the antimonopoly service and/or during a case hearing;
- discuss issues of price (discount) setting, sales conditions, production costs, and marketing strategies during business meetings and participation in meetings of Associations and disclose such information to Competitors;

- exchange any commercial information with the Competitors as part of meetings and events of Associations.

Employees **should:**

- cite information sources in business correspondence if the document (letter) refers to Competitors' prices and their market strategies;
- consult with the Responsible Unit before providing any statistical or confidential data on the Company's activities as part of its membership in Associations and participation in business meetings;
- familiarize themselves in advance with the program of a meeting (event) before attendance;
- consult with the Responsible Unit with regard to participation in events (voting, speeches planned by the Management and Employees) if this could potentially conflict with the requirements of the Antimonopoly Policy;
- state that the discussion must cease if matters which conflict with the requirements of the Antimonopoly Policy are discussed. If such discussion continues, leave the meeting and make sure that the raised objections were included in the minutes. At the end of the meeting, immediately inform the Responsible Unit of what occurred;
- speak to the Responsible Unit in the case of any doubt concerning the legality of matters discussed at a meeting.

6. ANTIMONOPOLY RISK MANAGEMENT SYSTEM

The antimonopoly risk management system is focused on implementing high standards of corporate ethics in the Company's activities, forming maximum interest and personal responsibility for Antimonopoly Compliance on the part of the Management and Employees of the Company when they exercise their official powers and take actions affecting the Company's business, and carrying out activities to assess the antimonopoly compliance risks of the Management and Employees of the Company and the mitigation of such risks.

The antimonopoly risk management system is a complex tool consisting of the following interrelated components and measures:

- implementation and maintenance of measures for corporate control of compliance with the requirements of the Antimonopoly Policy;
- implementation of practices and procedures for familiarizing the Management and Employees with the content of the Antimonopoly Policy;
- implementation of a program for improving the competence of the Management and Employees of the Company in the field of Antimonopoly Legislation;
- implementation of an antimonopoly clause in the Company's practice of concluding contracts with its counterparties;
- implementation of an instruction in the Employees' job descriptions to comply with the Antimonopoly Policy.

6.1. Measures for corporate control of compliance with the requirements of the Antimonopoly Policy

The following measures for corporate control of compliance with the requirements of the Company's Antimonopoly Policy have been established:

- a procedure for creating and defining the competences of the Company's Responsible Unit which provides corporate control of compliance with the requirements of the Antimonopoly Policy;
- a procedure for submission, receipt, and processing of information on possible violations of the requirements of the Antimonopoly Policy by the Company's Employees;
- a procedure for conducting a corporate investigation of violations of the Antimonopoly Policy and application of penalties for committed violations;
- a procedure and grounds for encouraging the Employees to comply with the Antimonopoly Policy.

6.1.1. The procedure for creating and defining the competences of the Company's Responsible Unit which provides corporate control of compliance with the requirements of the Antimonopoly Policy

The Responsible Unit (Legal Department) shall advise Employees of matters of compliance with the requirements of the Antimonopoly Policy during the conduct of official duties and review reports of violations of the Antimonopoly Policy.

To provide day-to-day corporate control of compliance with the requirements of the Antimonopoly Policy, the Company shall establish a Compliance Committee which in all cases shall include the Director for Legal Support, the Director for Interaction with Government Authorities, the Head of Internal Control and Risk Management Division of the Finance Directorate, representatives of the Personnel Department, Economic Security Department, Information Technology Department (if necessary), and Internal Investigation Department.

The structure of the Compliance Committee shall be approved by the executive order of the sole (collegial) executive body of the Company. The Committee shall be accountable only to the sole executive body of the Company.

The Committee shall have the following powers:

- conduct corporate investigations of violations of the Antimonopoly Policy;
- prepare opinions on whether or not there are grounds for taking disciplinary measures against the Employees for violation of the Antimonopoly Policy.

6.1.2. The procedure for submission, processing, and review of applications for advice on matters of compliance with the Antimonopoly Policy and possible violations by the Company's Employees of its requirements

6.1.2.1. Consulting

If any issues related to compliance with the requirements of the Antimonopoly Policy arise during the conduct of official duties, Employees may and, if expressly provided for by the Antimonopoly Policy, must submit an application for consultation to the Responsible Unit.

Such application shall be submitted in hard copy or by email at: 24@mvideo.ru, attaching the documents and materials which were the reason for the submission of the application.

After reviewing the application, the Responsible Unit shall prepare explanations of the procedure for compliance with the Antimonopoly Policy on the part of the Company's Employee who submitted the application.

If the Responsible Unit, after reviewing the application, has detected signs of a violation of the Antimonopoly Policy, such application shall be forwarded to the Compliance Committee for further corporate investigation.

6.1.2.2. Submission of reports on violation of the Antimonopoly Policy

If a Company Employee has learned of any violation of the Antimonopoly Policy in his/her actions or in the actions of any other Employee, such Company Employee shall report this fact to the Central Hotline: 8 (495) 777-777-5 (Moscow), 8 800 200-777-5 (regions), set up for the purpose of processing and storage of such information, its subsequent review by the Responsible Unit, and the conduct of corporate investigation by the Compliance Committee, or shall submit the report to the Responsible Unit in hard copy or by email.

Initial review of submitted reports shall be made by the Responsible Unit which, upon detection of violations of the Antimonopoly Policy, shall forward the reports to the Compliance Committee for corporate investigations.

6.1.3. The procedure for corporate investigation of violations of the Antimonopoly Policy

When conducting corporate investigations, the Compliance Committee shall apply the principles of confidentiality, impartiality, effectiveness, competence, and timeliness.

Confidential treatment shall cover any information on a corporate investigation, including details of the persons in respect of which it is conducted and the persons who submitted the report on a violation of the Antimonopoly Policy, materials gathered as part of such investigations, and information on their results.

Members of the Compliance Committee shall be impartial during any corporate investigation. Persons having a personal interest in the investigation results shall not be involved in the investigation, including those having close personal relationships with the person subject to investigation, for the purpose of preventing a conflict of interest. If a potential or actual conflict of interest is identified, the relevant person shall be excluded from the Compliance Committee for the purpose of conducting the corporate investigation.

If after the corporate investigation the Compliance Committee has established a fact of violation of the Antimonopoly Policy by an Employee and, consequently, signs of violation of the requirements of Antimonopoly Legislation, the Compliance Committee, within a reasonable term, may make a decision on whether there are grounds for disciplinary action in respect of such Employee or actions aimed at mitigating the consequences of such violation (if any exist).

In particular, after the corporate investigation, the Committee shall make the following decisions:

- whether or not there are grounds to take disciplinary action against the Employee under the procedure specified by the labour law of the Russian Federation and Company bylaws;
- on sending a written warning to the Employee imposing an obligation to complete training on Antimonopoly Compliance;
- on informing the Antimonopoly Agency of the violation of Antimonopoly Legislation detected in the actions of the Employee, including for the purpose of releasing Company from administrative and/or criminal liability or mitigation of such liability on grounds provided for by the law of the Russian Federation;
- on taking measures to improve the Antimonopoly Policy, including competence improvement programs for Employees and events on assessment of antimonopoly risks and their mitigation.

When making decisions, the Compliance Committee shall establish whether there were mitigating or aggravating circumstances.

The following may be considered as mitigating circumstances: cooperation of the Employee with the Compliance Committee during the corporate investigation, participation in remedying the committed violation and failure of the Employee's actions to lead to a violation of Antimonopoly Legislation by the Company.

Aggravating circumstances may include:

- refusal of the Employee to cooperate with the Compliance Committee during a corporate investigation or participate in remedying the committed violation;
- managerial position of the Employee;
- repeated violation by the Employee of the requirements of the Antimonopoly Policy;
- familiarity of the Employee with the content of the Antimonopoly Policy and completion by the Employee of antimonopoly compliance training and, consequently, disregard of its provisions;
- organization by such Employee of violation of the Antimonopoly Policy by other Employees;
- actions of the Employee leading to violation by the Company of Antimonopoly Legislation.

6.1.4. The procedure and grounds for encouraging compliance with the Antimonopoly Policy

The Company shall take measures to encourage the Employees to comply with the requirements of the Antimonopoly Policy and maintain high standards of corporate ethics aimed at excluding and preventing violations of Antimonopoly Legislation by the Employees.

The following may be considered as measures to encourage the Employees: non-financial recognition, including expression of gratitude to the Employee or business unit of the Company, and other types of incentives as provided for by Company bylaws and the labour law of the

Russian Federation for perfect compliance with the Antimonopoly Policy, timely Antimonopoly Compliance training, and successful passing of a test of knowledge of the Antimonopoly Policy.

6.2. Practices and procedures for familiarizing the Management and Employees with the content of the Antimonopoly Policy

The Management and Employees shall be familiarized annually with the content of the Antimonopoly Policy.

After familiarization with the content of the Antimonopoly Policy, the Management and each Employee shall fill in an acknowledgment form and sign acknowledgment statements, including acknowledgment that the Employee understands the content of the Antimonopoly Policy and undertakes to comply strictly with the requirements of the Antimonopoly Policy.

The Management and Employees of the Company shall be informed of the need to familiarize themselves with the content of the Antimonopoly Policy by a letter sent to their work email three working days in advance.

If the Management or Employees of the Company avoid familiarization with the content of the Antimonopoly Policy without good reason and avoid signing the statement, this fact shall be considered by the Compliance Committee as possible grounds to conduct a corporate investigation.

6.3. The program for improving the competence of the Management and Employees of the Company in the field of the Antimonopoly Compliance

To ensure the compliance of the Management and Employees of the Company with the requirements of the Antimonopoly Policy and maintain high standards of corporate ethics aimed at excluding and preventing violations of Antimonopoly Legislation, the Company shall take the following measures:

- arrange for regular training of the Management and Employees of the Company on matters of Antimonopoly Compliance, including engagement of external legal advisers according to the procedure provided for by the Company bylaws;
- perform regular testing of the Company's Management and Employees to check their knowledge of the Antimonopoly Policy and subsequent work on the part of the Management and Employees of the Company to eliminate errors;
- inform the Management and Employees of the Company of changes in Antimonopoly Legislation.

6.4. Measures for assessing and mitigating Antimonopoly Compliance risks and monitoring the effectiveness of the Antimonopoly Policy

6.4.1. Measures for assessing and mitigating Antimonopoly Compliance risks

To ensure the effectiveness of the Antimonopoly Policy, the Company shall regularly take measures to identify and update antimonopoly risks, taking into account the specific character of business processes of the Company, including:

- risks related to concluding contracts with Counterparties;

- risks related to carrying out advertising and marketing campaigns;
- risks related to potential interaction with Counterparties and Government Authorities or membership in Associations;
- risks arising if the Company has a significant share on a certain Goods Market.

Besides measures for improving the competence of the Management and Employees of the Company in the field of Antimonopoly Compliance as provided for by Clause 6.3. of the Antimonopoly Policy, the Company may publish special brochures (memos) for the Management and Employees, establish requirements for record keeping of meetings and negotiations and the preparation of legal opinions concerning compliance of draft contracts and planned advertising and marketing campaigns with Antimonopoly Legislation, and develop other procedures and measures for Antimonopoly Compliance which reasonably and proportionally correspond to the level and character of identified risks, goals and objectives of the Company.

6.4.2. External audit

If necessary, upon the decision of the sole executive body of the Company, an independent antimonopoly audit of the Company's business processes may be carried out, as well as an audit of the functioning of the Antimonopoly Policy with the participation of external legal advisers, according to the procedure provided for by Company bylaws.

6.4.3. Regular reports

To ensure the effectiveness of the Antimonopoly Policy and proper assessment of the results of measures for the identification and subsequent updating and prevention of antimonopoly risks, the Responsible Unit shall annually submit a report to the sole executive body on implementation of the Antimonopoly Policy for the calendar year and proposals for its improvement.

If, after consideration of such report, the sole executive body identifies a need to develop additional tools for prevention of antimonopoly risks, the provisions of the Antimonopoly Policy may be amended, including amendments aimed at improvement of the procedure for its implementation and realization.

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