	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 1</i>

ADOPTED BY

General Director



I.V. Romanchenko

05 March 2019

ANTI-BRIBERY AND CORRUPTION POLICY

PetroTrace LLC

Effective date: March 05, 2019

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	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 2</i>

Table of Content

1. INTRODUCTION.....	3
2. GENERAL PROVISIONS.....	3
3. REFERENCED REGULATIONS	4
4. TERMS AND DEFINITIONS	5
5. APPLICABLE ANTI-BRIBERY AND ANTI-CORRUPTION LAW	10
6. PURPOSES and goals of anti-bribery and corruption policy	10
7. PRINCIPLES OF COMPANY’S ANTI-BRIBERY AND CORRUPTION POLICY	11
8. TARGETS OF COMPANY’S ANTI-BRIBERY AND CORRUPTION POLICY	12
9. LIABILITY	19
10. AMENDMENTS	19
11. DEVELOPERS LIST	20
12. RELEVANCE CHECK LIST	21

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 3</i>

1. INTRODUCTION

1.1. This anti-bribery and corruption policy adopted by PetroTrace LLC (hereinafter referred to as Anti-Bribery and Corruption Policy) reflects the commitment of PetroTrace LLC (hereinafter referred to as the Company) and its management to follow ethical standards of the highest level of a transparent business and honesty for improving corporate culture and to follow the best corporate management practices and uphold the business reputation of the Company, as well as outlines the key principles and requirements aimed at preventing corruption and securing the compliance by the Company, its management, employees and other persons acting on its behalf with the applicable anti-bribery laws.

1.2. The Company has in place the anti-bribery standards aimed at:


- preventing corruption, including the identification and further elimination of the origins of corruption (preventive measures against corruption);
- detecting, preventing, suppressing, uncovering and investigating corruption offences (control of corruption);
- minimizing and/or mitigating the effects of corruption.

2. GENERAL PROVISIONS

2.1. The Company's Anti-bribery and Corruption Policy is a core document that outlines the key tasks, principles and targets of anticorruption activities and that has been developed to coordinate efforts of Company's employees in implementing anticorruption policies for the prevention, identification and elimination of corruption in the Company.

2.2. The present document outlines:

- the purpose and goals of Company's Anti-Bribery and Corruption Policy;
- the principles of Company's Anti-Bribery and Corruption Policy;
- structure of management of Company's anticorruption activities;

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 4</i>


- focal points of Company’s Anti-Bribery and Corruption Policy;
 - key measures for preventing corruption, providing education in law issues and commitment to law abiding behavior of Company’s employees.
- 2.3. The Company’s Anti-Bribery and Corruption Policy is designed to provide compliance with the key principles of applicable anti-bribery laws.
 - 2.4. The Company’s Anti-Bribery and Corruption Policy applies to counterparties and representatives of the Company or any other persons if the relevant obligations are imposed on them under contracts.
 - 2.5. The Policy has been developed in accordance with and subject to the applicable laws of the Russian Federation, Articles of Association and other regulations of the Company.
 - 2.6. All employees of the Company must comply with this Policy and strictly follow the principles and rules as outlined therein.
 - 2.7. The General Director of the Company will be responsible for the arrangement and efficiency of any and all actions aimed at implementing the principles and rules of this Anti-Bribery and Corruption Policy, in particular for the appointment of persons responsible for the development of anticorruption procedures, their implementation and control.
 - 2.8. The General Director will adopt this Anti-Bribery and Corruption Policy of the Company, consider and adopt amendments and additions thereto, evaluate the general results of implementation and application of Company’s Anti-Bribery and Corruption Policy. The General Director shall arrange for the development and implementation of the methodology for review and improvement of this Policy and/or anti-bribery procedures if it turns out that any provision of this Anti- Anti-Bribery and Corruption Policy or any anti-bribery procedure related thereto is not sufficiently efficient or if any changes are made to anticorruption laws of the Russian Federation or any other jurisdiction.

3. REFERENCED REGULATIONS

Russian Federal Anticorruption Law of 25.12.2008 №273-Ф3 (as amended).

Russian Federation Civil Code dated 13.06.1996 №63-Ф3 (as amended).

Russian Federation Code of Administrative Offences dated 30.12.2001 №195-Ф3 (as amended).

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 5</i>

UK Bribery Act 2010.


US Foreign Corrupt Practices Act (FCPA 1977).

4. TERMS AND DEFINITIONS

Bribery (Section 291 of the Russian Federation Criminal Code)	Bribery of official, foreign official or official of international public organization either directly or through a third person
Officer of the Company	A person holding an executive office in the Company, in particular the office of chief executive officer, member of the board or any other collective executive body, or a person who performs organizational, management, administrative or business functions in the Company either on a temporary or permanent basis or under special authority
Officials	Persons who perform, on a temporary or permanent basis or under special authority, the duties of representative of the State power or exercise public administrative functions in: <ul style="list-style-type: none"> • government agencies and municipal councils • public and local bodies • government-owned corporations • government-owned companies and government and municipal unitary enterprises, • joint-stock companies with the majority ownership held by the Russian Federation, • regional governments of the Russian Federation or municipal agencies, as well as bodies of the Armed Forces of the Russian Federation and other military departments of the Russian Federation
Abuse of Office (Section 201 of the Russian Federation Criminal Code)	A person holding an executive office in a commercial organization or any other entity uses his or her official authorities contrary to the best interests of such entity for his or her own personal gain or for benefit of third person or causes damage to other persons, if such misconduct




	adversely affects the rights and best interests of individuals or corporations or statutory interests of society and state
Company	PetroTrace Limited Liability Company
Kickback (Section 204 of the Russian Federation Criminal Code)	Illegal transfer of money, securities, other property to a person who discharges any senior executive functions in a commercial organization or any other organization or provision of property-related services or transfer of any other property-related rights to such person to induce him or her to perform any acts (omissions) which lay within the scope of his or her official authority in favor of the person transferring such property or rights. Illegal acceptance by a person who discharges any senior executive functions in a commercial organization or any other organization of money, securities, other property and likewise illegal use of property-related services or any other property-related rights in exchange for the performance of any acts (omissions) which lay within the scope of his or her official authority in favor of the person transferring such property or rights
Conflict of interests	A situation when personal interests (direct or indirect) of Company's employee influence or may influence the proper performance by such employee of his or her official functions and when personal interests of Company's employee and the best interests of Company may appear to be or be perceived as being in conflict that may adversely affect the Company's interests
Corruption (in commercial organizations)	Abuse of office, giving of a bribe, acceptance of a bribe, abuse of authorities, kickback or any other abuse of powers by a Company's employee contrary to the best interests of society and state for obtaining illicit benefit in the form of money, values, other property or property-related services, other property-related rights in own favor or in favor of any third person, or illegal offer of such benefit to the said person by other natural persons, and performance of the said actions by Company's

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 7</i>


	employees on behalf or in the name of the Company
Corrupt practices	acts (omissions) of Company's employees which constitute corrupt practices or cause corruption
Personal benefit	Interest of Company's employee, his or her close relatives, spouse, adoptive parent, adopted child, in obtaining intangible benefits and advantages. Neither promotion to a new position nor commendation or citation may be treated as personal benefit
Financial benefit	Appreciable economic benefit such as money or property that may be defined as income under the Russian Federation tax laws
Illegal remuneration on behalf of legal entity (Section 19.28 of the Russian Federation Code of Administrative Offences)	Illegal transfer, offer or promise of money, securities, other property, provision of property-related services or property-related rights on behalf or in the name of legal entity to an official or a person who discharges senior executive functions in a commercial organization or any other organization, to a foreign public official or an official of international public organization to induce such official or the person discharging senior executive functions in a commercial organization or any other organization, or such foreign official or official of international public organization to execute an act (omission) in the exercise of official functions in favor of such legal entity
Illegal engagement or contracting of a public or municipal official or a former public or municipal official for the performance of work or provision of services (Section 19.29 of the Russian Federation Code of Administrative Offences)	Engagement by the Company under an employment contract or hire by the Company for the performance of work or provision of services under a service agreement of public official or municipal official holding an office included in the list of offices adopted under the applicable rules and regulations, or a former public official or a former municipal official holding such office in violation of the provisions of Federal Anticorruption Law № 273-ФЗ dated 25 December 2008



<p>Unethical business practices and unfair competition</p>	<p>Acts undertaken by the Company for obtaining advantages over its competitors in the market contrary to the provisions of Russian law, usual business practices, ethical code, requirements of reasonableness and fairness that have caused or may cause losses to other participants of the market or have done or may do harm to their business reputation</p>
<p>Acceptance of a bribe (Section 291.1, 204.1, 291.2, 204.2 of the Russian Federation Criminal Code)</p>	<p>Acceptance of a bribe by an official either directly or through a third party in the form of money, securities, other property of in the form of illegal provision of property-related services or property-related rights to such person (in particular in the events when a bribe is given to an individual or corporate third person as directed by an official) in exchange for any act (omission) in favor of the giver of a bribe or any persons he or she represents</p>
<p>Bribery/kickback mediation</p>	<p>Handing over of a bribe/kickback (illegal remuneration) on behalf of the giver of a bribe/the person giving a kickback or the bribe taker/ the person taking a kickback or any other promotion of execution or implementation of an agreement between the giver of a bribe and/or the bribe taker/participating parties for taking and giving a bribe/kickback</p>
<p>Corruption control</p>	<p>Activities of the parties to anti-bribery and corruption policy aimed at identifying, studying, limiting or eliminating the origins of and circumstances underlying corrupt practices</p>
<p>Near-conflict situation</p>	<p>A situation that creates a personal interest of Company's personnel and the Procurement Authority or representatives thereof that can interfere with the exercise of their official or professional functions and lead to the conflict of interests</p>
<p>Provocation of bribery and kickback (Section 304 of the Russian Federation Criminal Code)</p>	<p>An attempt to transfer money, securities, other property or provide property-related services or rights to a public official, a foreign public official, an official of international public organization or a</p>

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 9</i>

	<p>person performing senior executive functions in a commercial organization or any other organization without the consent of such official for simulating a bribery exchange or for blackmail purposes</p>
<p>Parties to Anti-bribery and corruption policy</p>	<p>Any employee of the Company, his or her representative and customers, contractors and other persons related to the Company provided that the relevant obligations are imposed on them under contracts</p>

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 10</i>

5. APPLICABLE ANTI-BRIBERY AND ANTI-CORRUPTION LAW

5.1. Russian anti-bribery and anti-corruption legislation: The Company and all employees of the Company shall comply with the provisions of Russian anti-bribery legislation, in particular but not limited to those set forth in the Russian Federation Criminal Code, Russian Federation Code of Administrative Offences, Federal Anticorruption Law and other regulations mainly aimed at restricting the following activities:

Corruption

Abuse of office

Giving of a bribe

Acceptance of a bribe

Bribe mediation

Abuse of authorities

Kickback

Illegal remuneration on behalf of the Company


Illegal engagement or contracting of a public or municipal official or a former public or municipal official for the performance of work or provision of services.

6. PURPOSES AND GOALS OF ANTI-BRIBERY AND CORRUPTION POLICY

6.1. The purpose of this Anti-Bribery and Corruption Policy is to develop and implement comprehensive and consistent measures for the prevention, elimination (mitigation) of causes and opportunities for corruption, promotion of anticorruption behavior based on zero tolerance of Company's employees and customers for corrupt practices.

6.2. The objectives of Anti-Bribery and Corruption Policy of the Company are as follows:

- to promote the consistent perception by Company's employees, contractors and customers of the Company's zero tolerance for corruption of any kind and origin;
- to mitigate the risk of the Company or its employees being involved in corrupt practices irrespective of their job positions;
- to prevent corrupt practices and to provide for the specific liability for corrupt acts;


	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 11</i>

- to compensate damage caused by corrupt practices;
- to promote anticorruption corporate behavior;
- to impose on Company's employees the obligation to know and comply with the principles and requirements of this Policy, key provisions of the applicable anti-bribery and anti-corruption legislation.

7. PRINCIPLES OF COMPANY'S ANTI-BRIBERY AND CORRUPTION POLICY

7.1. The key principles of Company's Anti-Bribery and Corruption Policy are as follows:

- The Principle of statutory compliance of Company's Anti-Bribery and Corruption Policy with the applicable laws of the Russian Federation and generally accepted rules. Compliance of the anticorruption mechanisms introduced by the Company with the Constitution of the Russian Federation, international treaties to which the Russian Federation is a party, Russian law and other applicable legal acts and regulations.
- The principle of personal example of senior executives. The Company's management plays a key role in the promotion of zero tolerance for corruption and creation of internal system for corruption prevention and control.
- The principle of employee engagement. To inform the Company's employees of the provisions of Russian anticorruption law and to encourage their participation in the development and implementation of anticorruption standards and procedures.
- The principle of efficiency of anticorruption procedures. To adopt such anticorruption mechanism in the Company that will be cost effective and will ensure simple and effective implementation.
- The principle of liability and inevitability of punishment. The principle of inevitability of punishment will apply to the Company's employees irrespective of their job positions, length of service and other factors, if such employees are liable for corrupt practices in the exercise of their official duties. The Company's management will be personally responsible for the implementation of Company's anticorruption policies.
- The principle of business transparency. Disclosure of anticorruption standards adopted by the Company for its business operations to contractors, partners and general public.
- The principle of constant control and regular monitoring. Regular monitoring of the efficiency of introduced anticorruption standards and procedures and control over their implementation.

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 12</i>

8. TARGETS OF COMPANY'S ANTI-BRIBERY AND CORRUPTION POLICY

8.1. Prohibition of Corruption


8.1.1. The Company's employees are strictly prohibited from being involved in corrupt practices either directly or indirectly or through third parties, and from offering, giving, promising, soliciting or accepting bribes or making payments for the facilitation of administrative, bureaucratic and other formalities, in any form, in particular in the form of money, valuables, services or any other benefit, to any persons or from any persons or entities, including commercial organizations, public authorities and local governments, public officials, private companies and their representatives to the advantage of the Company.

8.2. Adequate Anticorruption Procedures

8.2.1. The Company has developed and introduced adequate procedures for preventing corruption that reasonably mitigate the identified risks and set controls for compliance.

8.3. Mission of Company's Management

- 8.3.1. Company's officers shall promote the ethical standards of zero tolerance for any forms of corruption and corrupt practices at any level, by setting a good example and distributing Company's Anti-Bribery and Corruption Policy among employees and contractors.
- 8.3.2. The Company has adopted the principle of zero tolerance for any form of corruption and corrupt practices in the regular course of business or during implementation of strategic projects, in particular in its dealings with shareholders, investors, contractors, representatives of public authorities, local governments, political parties, its employees and other persons.
- 8.3.3. The General Director of the Company will be responsible for the compliance with the Anti-Bribery and Corruption Policy in the Company.
- 8.3.4. Officers of the Company will be responsible in the exercise of their official duties for strict compliance with the following principles:
- to comply with provisions of the applicable laws of the Russian Federation, other legal acts and regulations to the fullest extent, and in the event of lack of applicable legislation to follow the standards of good faith, reasonableness and due diligence and the provisions of this Anti-Bribery and Corruption Policy;
 - to be honest and fair in business relations, refrain from any unfair practices;
 - to respect the right of ownership, try to balance benefits from transactions;
 - if any risk of loss or reputational risk arises for the Company, to inform without delay thereof the senior executives of the Company.
 - not to use his or her job position, confidential information, tangible and intangible assets of the Company for his or her personal benefit;

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 13</i>


- to provide each other with assistance in making important decisions and in emergency conditions;
- not to engage in professional misconduct or any other behavior that may be perceived as compromising or unethical;
- refrain from unethical forms of competition;
- refrain from acts or omissions that may entail a conflict of business interests, try to settle the already arisen conflicts on the basis of balance of interests between the parties;
- if Company's officers are in doubt about their actions or any ethical aspects, they should refer such doubt for consideration to the person responsible for the implementation of Anti-Bribery and Corruption Policy.
- to inform the person responsible for the implementation of Anti-Bribery and Corruption Policy of any offices they hold within other entities without consent of the Company, if the duties related to such offices entail a conflict of interests between such officers and the Company. An officer of the Company shall inform the person responsible for the implementation of Anti-Bribery and Corruption Policy of his or her intention to hold such office before he or she gives his or her consent to take such office.

8.4. Obligations of Company's employees:

- to refrain from commitment of or involvement in corruption offences on behalf or in the name of the Company;
- to refrain from behavior that may be perceived by others as an attempt to commit or engage in a corruption offence in the interests or on behalf of the Company;
- inform without delay their immediate supervisor or the person responsible for the implementation of Anti-Bribery and Corruption Policy or a senior executive of the Company, if an employee is induced to engage in corrupt practices;
- inform without delay their immediate supervisor or the person responsible for the implementation of Anti-Bribery and Corruption Policy or a senior executive of the Company of any corruption offence committed by other employees, contractors of the Company or any other persons of which an employee becomes aware;
- inform without delay their immediate supervisor or any other responsible person of any possible or actual conflict of interests affecting the employee.

8.5. Regular Risk Assessment

- 8.5.1. The Company will identify, consider and assess its exposure to corruption risks inherent in the Company's operations on a regular basis.

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 14</i>

8.6. Permission to Company's Personnel, Contractors and Other Persons (Individuals and Legal Entities) to Report Incidents of Corruption

- 8.6.1. The Company proclaims its openness to reports of corruption.
- 8.6.2. The Company will accept reports of corruption sent via email at the address compliance@ptgeos.com, or by registered letter to the postal address of the Company or delivered in person.
- 8.6.3. The Company will follow the principles of efficient corruption report handling system in the Company and will provide responses within the time limits stipulated in the applicable laws of the Russian Federation and internal regulations of the Company.


8.7. Managing a Conflict of Interests

- 8.7.1. The Company proclaims that it takes measures to ensure compliance with corporate code of ethics, corporate conduct standards, internal regulations governing conflicts of interests and measures to prevent any of such occurrences.
- 8.7.2. The Company will take actions preventing the occurrence of conflicts of interests to eliminate any opportunity for improper financial and/or personal benefit to be derived either in person or through a third party from the privileges secured for Company's employees or members of their families or persons having a close relationship with such employees (parents, spouses, children, brothers, sisters, children of spouses and spouses of children) in connection with the positions they hold.
- 8.7.3. The Company will try to prevent and timely eliminate near-conflict situations between employees of the Company.
- 8.7.4. The Company will follow the following principles for the management of conflicts of interests:
 - compulsory disclosure of any actual or potential conflict of interests;
 - investigation of each conflict of interests on a case-by-case basis and assessment of reputational risks for the Company and settlement of each conflict of interests;
 - confidentiality of the procedures governing the disclosure of conflict of interests and settlement thereof;
 - proper balance of interests between the Company and its employee to be achieved during the settlement of a conflict of interests;
 - protection of reporting employee from retaliation in connection with any conflict of interests timely disclosed by such employee and settled (prevented) by the Company.

8.8. Anticorruption Measures

The Company is planning to take the following anticorruption measures to prevent and control corruption:

- 8.8.1. Development and introduction of specific anticorruption procedures:

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 15</i>

- updating of anti-bribery and anti-corruption policy;
- review of policy and making amendments consequential on recent changes to the law, adoption of new policies and procedures.
- regular assessment of corruption risks for identifying the most exposed Company's operations and development of specific anticorruption actions.

8.8.2. Provision of training and information to employees of the Company:

- provision of Company's regulations governing the prevention and control of corruption in the Company to Company's employees with written acknowledgement of receipt;
- provision of training in the prevention and control of corruption;
- provision of individual consulting to Company's employees in the issues of implementation of (compliance with) anticorruption standards and procedures.

8.8.3. Verification of compliance of Company's internal audit system with the requirements of corporate anti-bribery and corruption policy:

- constant monitoring of compliance with internal procedures;
- constant monitoring of the appropriateness of expenditures that constitute a major corruption risk.


8.8.4. Assessment of anticorruption efforts and distribution of reports:

- regular assessment of efforts focused on the prevention of corruption;
- preparation and distribution of reports in connection with the actions taken and results achieved in the area of corruption prevention.

8.9. Dealings with Contractors

8.9.1. The Company selects its largest contractors for the provision of work and services to the Company on a tender basis by selecting a prospective supplier offered the best competitive price on the following principles:

- study of the market of offered services;
- equality, fairness, no discrimination or competition restrictions with respect of procurement parties;
- honest and reasonable selection of the most preferable offers on the basis of complete benefit-cost analysis (in the first place, the analysis of price and quality of products);
- appropriate and efficient use of funds for the purchase of goods, work and services (taking into consideration, if appropriate, the life-cycle cost of purchased products) and implementation of measures aimed at cutting Company's expenditures;
- no steps to restrict access to a tender by imposing disproportionately onerous demands on suppliers;

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03-2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 16</i>


- prevention of corrupt behavior, conflicts of interests or any other abuse of power or authority.
- 8.9.2.** The Company tries to deal with contractors who comply with the requirements of anti-bribery and anti-corruption law and/or contractors who have zero tolerance for corruption.
- 8.9.3.** The Company proclaims that it will refrain from giving any benefit to employees of counterparties, in particular by offering money, gifts, free-of-charge services to such employees or in any manner not mentioned herein as a result of which the employee of counterparty will fall into position of dependence and will be forced to take certain actions in favor of the Company.
- 8.9.4.** The Company will take reasonable efforts to mitigate the risk of business relationship with a counterparty that might be involved in corrupt practices and therefore the Company will evaluate the counterparty's tolerance to bribery, in particular the adoption by such counterparties of anticorruption procedures and policies and their readiness to comply with the requirements of this Policy and include anticorruption provisions (clauses) in contacts, as well as their willingness to provide assistance in ethical business practices and prevention of corruption.

8.10. Gifts and Entertainment Expenses

- 8.10.1.** The Company encourages the development of partnership relations with external customers and counterparties and allows the exchange of modest corporate gifts between partners.
- 8.10.2.** The Company allows gifts to be offered and accepted by its employees to and from customers/counterparties, provided that the cost of such gifts does not exceed 3 000 rubles unless otherwise specified in guidelines issued by the General Director of the Company. If the cost of gift exceeds 3 000 rubles, the employee shall report it to its immediate supervisor and the person responsible for the implementation of Anti-Bribery and Corruption Policy and obtain their approval.
- 8.10.3.** If the acceptance of gift entails the provision of any privileges or advantages to a client (counterparty), the employee shall immediately inform thereof his or her immediate supervisor and the person responsible for the implementation of Anti-Bribery and Corruption Policy.
- 8.10.4.** Company's employees may offer gifts to customers in accordance with the Company's procedures regulating expenditures.
- 8.10.5.** Gifts to Company's customers will be offered only if the company of such customer has not adopted any rules prohibiting the acceptance of such gifts.
- 8.10.6.** Money should never be offered as a gift.

8.11. Charitable and Sponsorship Activities

- 8.11.1.** The Company will not donate to charitable or sponsorship schemes for obtaining commercial advantages for specific projects of the Company.

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 17</i>

8.12. Participation in Political Activities


- 8.12.1.** The Company will not either directly or through its employees provide finance to political parties, public associations for obtaining or retaining any advantage in business.
- 8.12.2.** The Company's employees may on their own behalf participate in public associations, such as political parties, public organizations, citizen groups, public foundations and other non-for-profit organizations established under the applicable laws of the Russian Federation, and international public associations established not for gaining and retaining any advantage in business for the Company.
- 8.12.3.** The Company's employees who have a membership in public associations should not offer, give, promise or make payments, contribute property, give gifts or take other actions on behalf of the Company for obtaining or retaining any advantage in business for the Company.
- 8.12.4.** The Company's employees will be solely liable under Russian law for their membership in public organizations.

8.13. Interaction with Public Officers

- 8.13.1.** The Company will not pay either directly or through its employees any costs (remuneration, loans, services, entertainments, recreational costs, transportation charges and other fees) for public officials and their close relations (or in their interests) for obtaining and retaining any advantage in business.
- 8.13.2.** The Company will interact with public officers through a person responsible for the implementation of Company's Anti-Bribery and Corruption Policy and such interaction is subject to the prior approval by such person.
- 8.13.3.** Offering of gifts to a public official shall comply with the requirements of this Anti-Bribery and Corruption Policy and the law of the Russian Federation.
- 8.13.4.** The Company's employees will be solely liable for any corrupt behavior emerging from their direct interaction with public officials under the applicable laws of the Russian Federation.

8.14. Payments through or in favor of Third Parties

- 8.14.1.** The Company and its employees should not hire or engage third parties, partners, agents, joint ventures or other persons for taking any actions that are contrary to the principles and requirements of Company's Anti-Bribery and Corruption Policy or the provisions of applicable anti-bribery and corruption law of the Russian Federation.
- 8.14.2.** The Company will have in place screening procedures for the verification of intermediaries, partners, counterparties and other persons for the purpose of preventing and/or detecting the above described violations and mitigating and eliminating the risk of Company's engagement in corrupt practices.

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 18</i>

8.15. Accounting Record Keeping


- 8.15.1.** The Company shall keep accurate, proper and detailed records of all its financial operations, and such records shall be supported by documents and shall be available for inspection.
- 8.15.2.** The Company has appointed persons responsible for the preparation and presentation of complete and accurate financial statements within the prescribed time limits in accordance with the applicable laws of the Russian Federation.
- 8.15.3.** Any accounting misrepresentation or falsification of accounting records is prohibited under the applicable laws of the Russian Federation.

8.16. Prevention of Corruption

- 8.16.1.** The Company will provide training to and inform its employees about anti-bribery and anti-corruption law, measures to be taken by the Company for this purpose and the provisions and requirements of this Anti-Bribery and Corruption Policy.
- 8.16.2.** The Company hereby declares that none of its employees will be held responsible (by being dismissed, demoted, deprived of bonus), by the Company if the employee reported under clause 8.4. of this Anti-Bribery and Corruption Policy the presumed corruption, or if the Employee refused to give or take a bribe, or render mediation in acts of bribery, including if such refusal results in foregone profit for the Company or in the loss of commercial or competitive advantages.
- 8.16.3.** The Company expects all employees to observe the Company's Anti-Bribery and Corruption Policy, and the Company will inform them of key principles, requirements and disciplinary actions to be taken in the event of any non-compliance. All employees shall comply with the Company's Anti-Bribery and Corruption Policy and strictly follow its principles and requirements.
- 8.16.4.** Any employee of the Company who is not sure that his or her activities are proper or comply with the goals, principles and requirements of Anti-Bribery and Corruption Policy, as well as has doubts about acts, omissions or proposals of other employees, contractors or other persons who deal with the Company shall inform of such doubts his or her immediate supervisor and/or the compliance officer, who, if necessary, will provide recommendations and clarifications in respect of the occurred situation.
- 8.16.5.** Taking into consideration the changes in corruption risks and other factors affecting business operations of the Company over time, the Company will monitor the introduction and implementation of adequate anticorruption procedures and, if necessary, review and improve such procedures.

8.17. Provision of Information

The Company will publish this Anti-Bribery and Corruption Policy on its Corporate Website and hereby proclaims that it has a zero tolerance for corruption and encourages the

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 19</i>


compliance with the principles and requirements of Anti-Bribery and Corruption Policy by all contractors, employees, members of governing bodies and other persons.

9. LIABILITY

- 9.1. All employees across all departments of the Company irrespective of their positions will be liable for any failure to comply with the principles and requirements of Company's Anti-Bribery and Corruption Policy and for any acts (omissions) of their subordinates that are in violation of such principles and requirements.
- 9.2. The corporate liability for corrupt practices includes the following: liability under criminal, administrative and disciplinary law of the Russian Federation and corporate corrective actions provided for by the internal regulations of the Company.
- 9.3. The Company is entitled to conduct corporate internal investigations based on each reasonable suspicion or established fact of corruption to the extent provided for by the law of the Russian Federation.

10. AMENDMENTS

- 10.1. The Company shall arrange for the development and implementation of the methodology for review and improvement of Company's Anti-Bribery and Corruption Policy if it turns out that any provision of this Anti-Bribery and Corruption Policy is not sufficiently efficient or if any changes are made to the applicable laws of the Russian Federation.

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 20</i>

11.DEVELOPERS LIST

Developer

I.V. Romanchenko

General Director



Personal signature

05.03.2019.

Date

E.G. Alyabeva


Human Resources Director



Personal signature

05.03.2019

Date

	PetroTrace LLC			Anti-bribery and corruption policy PetroTrace LLC 05-03- 2019
	<i>Issue 1</i>	<i>Rev. 0</i>	<i>Copy №1</i>	<i>Page 21</i>

12. RELEVANCE CHECK LIST

Date of relevance check	Full name of responsible employee	Signature of responsible employee

ПРИКАЗ № 003/19-АДМ

ORDER № 003/19-АДМ

Москва

05.03.2019

City of Moscow

05.03.2019

О введении в действие
антикоррупционной политики ООО
«ПетроТрейс»

On the application of Anti-Bribery and
corruption policy of PetroTrace LLC

ПРИКАЗЫВАЮ:

IT IS ORDERED AS FOLLOWS:

1. Ввести в действие
Антикоррупционную политику 05
марта 2019 года.

1. Put into effect the Anti-bribery and
corruption policy PetroTrace LLC
effective March 05, 2019.

2. Ознакомить всех
работников ООО «ПетроТрейс» с
данной антикоррупционной
политикой под роспись.

2. Bring the said Anti-bribery and
corruption policy to the attention of all
the employees of PetroTrace LLC.

3. Контроль за
исполнением настоящего приказа
оставляю за собой.

3. I shall personally supervise the
implementation of this order.

Генеральный директор/
General Director



И.В. Романченко/
I.V. Romanchenko

С приказом ознакомлены/ Read and understood:

Ф.И.О., должность/ Name, Job title

Подпись/ Signature

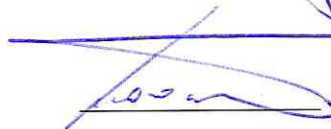
Дата/ Data

Баранский Н.Л./ Baransky N.L.
Президент Общества/ President



05.03.2019

Болотник Д.Н./ Bolotnik D.N. Вице
- президент общества/ Vice-
President LLC



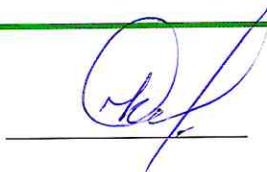
05.03.2019

Алябьева Е.Г./ Alyabeva E.G
Директор по управлению
персоналом / HR Director



05.03.2019

Осман К.Т./ Osman K.T.
Финансовый директор/ Finance
Director



05.03.2019.

Медведев Д.К./ Medvedev D.K.
Директор по сервисным работам/
Services Projects Director



05.03.2019

Королев А.Е./ Korolev A.E.
Руководитель департамента
обработки и миграции данных/
Manager of Processing and Imaging
Department



05.03.2019

Зелезняк Ф.Ф./ Zeleznyak F.F.
Главный геолог/ Chief Geologist



05.03.2019.

Кондаров А.Е./ Kondarov A.E.
Руководитель отдела
информационных технологий/
Manager of IT Department



05.03.2019

Шевченко А.А./ Shevchenko A.A.
Руководитель отдела разработки
технологий и программного
обеспечения/ Head of Research and
Development Department



05.03.2019

Макарова Е.С./ Makarova E.S.
Директор по сервису департамента
интегрированных проектов/
Service Director of Integrated
Projects Department



05.03.2019.