

APPROVED BY
Director of Economic Disputes LLC
Belyavsky S.Ch.,
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POSITION ON COMPLIANCE WITH ANTI-CORRUPTION LEGISLATION

1. PURPOSE OF THE POSITION

Is current its Regulation establishes the basic principles and requirements to comply with "Economic disputes" LLC, the Arbitration Court "economic disputes", individual entrepreneur Belyavsky S.Ch. (hereinafter the "Company") and employees of these organizations, as well as all third parties acting on behalf of and / or in the interests of the Company, the provisions of the anti-corruption legislation applicable to the Company .

By this Regulation, the Company's management and employees of the Company set the following goals for themselves:

To establish measures aimed at improving the corporate culture of the Company, introducing and developing the best corporate governance practices in the Company, as well as standards of responsible business conduct;

Express the Company's commitment to the principles of legality, transparency and social responsibility in order to maintain its high business reputation with the state, customers, partners, competitors and society as a whole;

Outline the principles aimed at preventing any manifestation of corruption, both on behalf of and in relation to the Company and (or) its Employees, as well as compliance, regardless of the circumstances, with the requirements of applicable anti-corruption legislation when the Company conducts business in any country in the world.

2. DEFINITIONS OF TERMS AND ABBREVIATIONS

Employees (for the purposes of this provision) - Individuals who are in labor relations with the Company, or who have entered into a civil agreement with the Company, as well as organizations that have entered into a Partnership Agreement with the company. Representatives - Agents, consultants, as well as all categories of intermediaries and other third parties acting in the interests and (or) on behalf of the Company.

Applicable anti-corruption legislation - Belarusian anti-corruption legislation, international and foreign anti-corruption legislation.

Belarusian anti-corruption legislation - the Law of the Republic of Belarus "On Combating Corruption", the Law of the Republic of Belarus "On State Procurement of Goods (Works, Services)", the Law of the Republic of Belarus "On Civil Service in the Republic of Belarus", the Criminal Code of the Republic of Belarus, the Civil Code of the Republic of Belarus, The Code of the Republic of Belarus on Administrative Offenses, other laws and bylaws of the Republic of Belarus, containing norms aimed at combating corruption.

International and foreign anti-corruption legislation - the United Nations "United Nations Convention against Corruption" Convention (Concluded in New York 10/31/2003), Council of Europe Convention N 173 "On criminal responsibility for corruption (ETS N 173)" (The concluding Chen in Strasbourg 27.0 1.1999), otherwise similar to the international law and the law states, where the company I operate.

State bodies, institutions and enterprises - state authorities of the Republic of Belarus and foreign states, local government and self-government bodies, political parties, as well as all legal entities directly or indirectly controlled by the state.

Public Official (GDL) - any person, Belarusian or foreign, appointed or elected, who holds any position in a legislative, executive, administrative or judicial body or international organization; any person performing any public function for the state, including for a State body, institution or enterprise; leading politicians, officials of political parties, including candidates for political posts, ambassadors, influential functionaries in state areas of the economy; managers and employees of government agencies, institutions and enterprises, persons known to be related to a government official by family, friendship or business relations.

3. OBJECTIVES OF THE SITUATION

Is current e Regulation resolves the following practical problems to achieve their Goals:

- Bring to the attention of the Employees and Representatives of the Company information about their obligation to know and unconditionally comply with the key principles of compliance with the Applicable anti-corruption legislation set out in this Regulation, as well as the measures and procedures used by the Company to prevent corruption;
- Establish the responsibility of the Company's Management to ensure and monitor the development and implementation of an effective system of compliance with the Applicable anti-corruption legislation;
- Prevent participation of the Company, Employees and Representatives in corruption activities;
- - To minimize the risk of bringing the Company, Employees to criminal, administrative or civil liability;
- To form among Employees, Representatives, a uniform understanding of the Company's policy on the prevention of corruption in any form and manifestation;
- Strengthen measures to ensure the reliability and transparency of the Company's financial statements, as well as the legal and efficient use of its assets.

4. APPLICABLE ANTI-CORRUPTION LAW

Is current its Regulations designed to in accordance with the requirements of anti-corruption legislation of Belarus, international and foreign anti-corruption legislation and the Charter and other internal documents of the Company.

5. KEY PRINCIPLES

Company I adhere to the principles of compliance with anti-corruption laws and ethical business conduct in all types of business relationships, and irrespective of the country of the world, for customers which the Company provides services. Principles and requirements is a current of the Regulation shall be binding to all employees of the Company and representatives.

The Company establishes the principle of rejection of corruption in all forms and manifestations, both in daily activities and in the implementation of strategic projects. Therefore, all Employees, as well as any third party acting on behalf and / or in the interests of the Company, are prohibited from:

- Offer, promise, authorize, or make payments in cash or any other value, including but not limited to business gifts, reimbursement of expenses, discounts, entertainment, etc., as well as any financial or other benefit or advantage to any Government an official, a representative of a commercial organization or any other person in order to influence his actions (ensure inaction) and induce him to perform his official duties in an inappropriate manner and / or to obtain an inappropriate commercial advantage;
- Require, give consent to receive or receive any payments in the form of cash or any other value, as well as any financial or other benefit or advantage, if the receipt of such payments, benefits or advantages is in itself improper performance of official or other duties provided by law, or is a reward for the improper performance of such duties;

- Mediate bribery or commercial bribery, that is, directly transfer bribes on behalf of the bribe giver or bribe taker, or otherwise assist the bribe giver and / or bribe taker in reaching or implementing an agreement between them on receiving and giving a bribe or commercial bribery.

5.1. Mission of the Leadership

By its behavior, the Company's management must set the standard of ethical behavior, by personal example, form in Employees, Representatives an irreconcilable attitude towards any forms and manifestations of corruption, which should become an integral part of the corporate culture and everyday business practices of Employees and Representatives.

5.2. Reputation Leadership

Company I will use reasonable efforts to prevent at any office of the Company of persons who are known to be involved or have been involved in illegal activities.

5.3. Consistency of Gender dix

The Company consistently ensures compliance with the Applicable anti-corruption legislation, namely, promotes the principles of ethical business behavior and, in particular, motivates Employees, Representatives to adhere to the principles of compliance with this Regulation, as well as invariably applies sanctions in all cases of violation of this Regulation.

5.4. Periodic assessment and minimization of risks

The company annually carries out activities to identify, assess and reassess corruption risks, paying special attention to the risks inherent in its activities and potentially vulnerable business processes.

The risk assessment and revaluation results, Company I develop and implement procedures to combat corruption, it is reasonable and proportional to the corresponding level and the nature of the identified risks.

5.5. Information and training

The Company openly declares its rejection of corruption and requires its Employees, Representatives to unconditionally comply with the principles and requirements of this Regulation.

The Company continuously monitors all changes in regulatory requirements and practice of enforcement of the Applicable anti-corruption legislation and timely informs all interested parties about the relevant changes and trends.

The Company implements and maintains a training program for Employees and Representatives on the principles and standards of compliance with Applicable anti-corruption legislation through trainings. Trainings are carried out for employment, joining the Company; annually in electronic form; on a regular basis in full-time, but at least once every two years; as well as the need arises, including in the event of significant changes in the Applicable Anti-Corruption Law or in the Company's anti-corruption procedures.

By informing and training the Company, it helps to increase the level of corporate culture, awareness of anti-corruption issues and ethical business conduct.

5.6. Monitoring and control

The company monitors the effectiveness of the implemented procedures to prevent corruption, controls compliance with such procedures, and, if necessary, improves them.

5.7. Responsible official

In order to ensure compliance with applicable anti-corruption legislation Company I appointed as the official responsible for the implementation and improvement of the anti-corruption system 's measures it heads of the Company.

6. CONTRACTUAL POLICY

6.1 Prohibition of non-contractual agreements

Company I prohibited by its name or in its interests to enter into any non-contractual agreement with any of the categories of counterparties, namely any written or oral agreements

that are not included in the main text of the agreement with the counterparty or its annexes, or any other form, but not the last adopted in the Company standard reconciliation procedures.

Any prisoner Company s contract or agreement in his writing, including all its annexes, which are an integral part thereof, shall contain the full terms and agreements, which is a contract or agreement.

6.2 Anti-corruption clause

In order to comply with the Applicable anti-corruption legislation, as well as to minimize the risk of prosecution due to the involvement of the Company in corrupt activities, as a general rule, the Company initiates the inclusion of an anti-corruption clause in any contracts / agreements concluded.

7. VERIFICATION OF CONTRACTORS

The Company makes reasonable efforts to minimize the risk of establishing business, labor and other relationships with individuals or legal entities that may be involved in corrupt activities and, thus, expose the Company to the risk of being involved in such activities.

In order to minimize the risk of involvement of the Company in corrupt activities, the Company complying with the requirements of the applicable test procedure laws are developed and implemented in respect of contractors - legal persons (including members of joint enterprises, societies or associations), as well as for natural persons, with whom Company I plans to conclude an employment contract or a civil law contract.

8. CONTRACTORS

Company I paid particular attention to assessing counterparty tolerance to corruption, including checking for their own compliance systems anti-corruption legislation, their willingness to comply with the requirements is a current of the Regulations and include anti-corruption clauses contracts.

In relations with its suppliers, contractors and other representatives Company I is taking active measures to prevent all acts of corruption, both on behalf of and in relation to the Company. In this regard, the Company I requires its suppliers, agents and other contractors will certainly adhere to the principles of compliance with applicable anti-corruption legislation, as well as mutually supportive culture that does not permit any unethical business behavior as when participating in procurement procedures of the Company and the subsequent doing business with the Company .

9. GIFTS AND REPRESENTATIVE COSTS

In accordance with the Applicable Anti-Corruption Laws, gifts, as well as entertainment expenses, including expenses for business hospitality, which Employees on behalf of the Company may make for other individuals or legal entities, or which Employees, in connection with their work in the Company, may receive from other persons and organizations, under certain circumstances, may be construed as illegal. In this regard, any gifts and entertainment expenses must meet the combination of the following criteria:

- be directly related to the legitimate goals of the Company's activities, for example, with the presentation or completion of projects, the promotion of goods or services, the successful execution of contracts, or with generally accepted holidays such as Christmas and New Year, Defenders of the Fatherland Day, International Women's Day, Lawyer's Day, memorable dates, anniversaries, etc.;
- be reasonably reasonable, proportionate and not luxury goods;
- not to compromise the recipient's ability to make impartial and fair decisions in connection with the official and official powers (duties) assigned to him, namely, but not limited to, provided in exchange for information, preferential treatment or opportunities that would not otherwise have been provided;

- not represent a hidden reward for a service, action, inaction, connivance, patronage, granting rights, making a certain decision on a transaction, agreement, license, permit, etc. or an attempt to influence the recipient for another illegal or unethical purpose;
- not create reputational risk for the Company in case of disclosure of information about such gifts or entertainment expenses;
- not be prohibited by law, as well as other procedures and policies applicable to the recipient;
- not impose any moral obligation on the recipient;
- does not contradict the principles and requirements is a current of the Regulations, the Code of Business Conduct and Ethics and other internal documents of the Company and to applicable anti-corruption laws;
- go through the necessary, established in the Company, harmonizing procedures, be authorized by a superior manager and documented.

These criteria also apply to the costs of organizing on behalf of and / or at the expense of the Company of activities aimed at stimulating consumer activity, attracting, retaining or developing a client base, as well as activities related to the Company's activities in the field of public relations, media, investment and professional community.

Gifts on behalf of the Company, Employees and Representatives to any third parties in the form of cash, cash or non-cash, as well as their equivalents in any currency are not allowed.

10. CHARITY, SPONSORSHIP AND CORPORATE SOCIAL RESPONSIBILITY

Company is committed to participate in projects in the field of Social Responsibility Pro Bono, support initiatives by governments and charitable organizations aimed at welfare of society and its development.

To achieve these goals, as well as in order to comply with the Applicable anti-corruption legislation, the Company has developed and implemented procedures governing the Company's participation in sponsorship and charitable activities; all financial transactions related to sponsorship or charitable activities are detailed and accurately reflected in the accounting records; projects under implementation are subject to preliminary approval; charitable donation monitoring procedures provide reasonable assurance that donations made are not a disguised form of bribery or commercial bribery.

In accordance with are real m Regulations and procedures for implementation, Company I was not funded in any other way is not involved in charitable and (or) sponsorship activities in order to obtain any improper advantage or preference in relation to economic activity.

11. FINANCING POLITICAL ACTIVITIES

In accordance with this Regulation, the Company does not finance or in any other way support or stimulate political parties or their members, including candidates for political posts, their election campaigns or political events, as well as any political organizations or movements.

12. PAYMENTS THROUGH INTERMEDIARIES OR IN FAVOR OF THIRD PARTIES

Company and, Employees are prohibited to involve or use the Representatives of the Company or other third parties to perform any actions that are contrary to the principles and requirements is a current of the Regulation or of the applicable anti-corruption laws.

The Company, Employees are prohibited from making payments to the Company Representatives or other third parties if it is known (or should be known) with a high degree of certainty that all or part of this payment will be used for corruption purposes. Company I provides carrying out verification procedures in respect of Representatives and other third parties in order to prevent and / or detect violations described above in order to minimize risks involving the Company in corrupt activities.

13. ACCOUNTING

All financial transactions, accounting entries and records must be reliably and with a sufficient level of detail recorded in the accounting records of the Company, are documented and available for inspection.

The Company has developed and implemented internal financial control procedures aimed at:

- all financial transactions were carried out in accordance with the general or specific authorization of the Management;
- accounting records were made to such a degree of accuracy and detail that would allow preparing statements that comply with applicable accounting (financial) reporting standards;
- access to the disposal of assets was provided only in accordance with the general or special authorization of the Management;
- accounting records of the value and composition of assets were regularly compared with the actual value and composition, and, if necessary, appropriate measures were taken.

The Company has appointed Employees who are responsible for the preparation and provision of complete and accurate financial statements within the time frame established by applicable law.

Non-compliance or non-compliance with the attempt of the internal financial control procedures, distortion or falsification of the financial statements of the Company is strictly prohibited and is a violation of the relevant legislation.

14. CONTROL

The Company regularly conducts internal control of financial and economic activities, as well as continuously monitors the completeness and correctness of the reflection of all business transactions in accounting and compliance with the requirements of applicable legislation and internal regulatory documents of the Company, including the principles and requirements established by this Regulation.

As part of the internal control procedures, the Company conducts inspections of the discipline of compliance with the established procedure for performing business processes, including checks on the legality of operations with the Company's assets, their economic feasibility, the feasibility of expenses, including for confirmation by primary accounting documents and compliance with the requirements of this Regulation.

15. REPORTING VIOLATIONS

Every employee, regardless of position or representative of the Company, which became known facts (or indicate to them the signs) infringement or inducing breach of the provisions is a current of provisions and / or applicable anti-corruption laws as the employees, representatives of the Company and third parties shall be obliged to report it in any of the following ways:

- direct e- mail to the e-mail address of the head of the Company [ma - xima @ yandex . ru](mailto:ma-xima@yandex.ru), including anonymously (from an external email address),
- to the immediate supervisor of any level or, if the message concerns the actions of the immediate supervisor, to the superior supervisor.

The Company undertakes, within the limits of its authority, to protect Employees who in good faith have reported a violation or suspected violation of this Policy and / or Applicable Anti-Corruption Laws, from harassment or any form of discrimination by the person against whom the report was made.

In addition, the Company, I will ensure that no employee is not to be subject to sanctions (including fired, demoted, deprived of bonuses and so on.) By the Company if the employee in good faith reported alleged incidents of corruption or if the employee refused to give or receive bribery, commercial bribery, or mediation in bribery, including if the refusal resulted in lost profits for the Company or commercial or competitive advantages were not obtained.

The Company's warranties that it will not apply sanctions do not apply to the guilty Employees, as well as to cases if, as a result of an internal investigation, it is proved that the corresponding message was willfully false, perjury or slander.

16. RESPONSIBILITY

Since the Company I may be subjected to a sanction for their participation Employees of the Company, Representatives and other related parties in the corrupt activities that each of reasonable suspicion or finding of corruption will initiate an internal investigation, in accordance with locally-normative acts of the Company, establishing the procedure of initiation and conducting such an investigation to the extent permitted by applicable law.

Persons guilty of violation of the requirements is a current of the Regulations and the applicable anti-corruption law, may be brought to disciplinary, administrative, civil or criminal liability under the initiative of the Company, law enforcement or other persons in the manner and on the grounds stipulated by the Charter of the Company, local regulatory acts and employment contracts, as well as, where applicable and justified, in accordance with Applicable Anti-Corruption Laws and other similar foreign regulations.

17. FULFILLMENT OF THE PROVISION

The person responsible for the development, implementation, improvement and monitoring of the Company's anti-corruption measures is the Head of the Company.

The Company's management is responsible for the content and effectiveness of the corporate anti-corruption measures system as a whole, as well as for ensuring the implementation and implementation of controls and procedures of the anti-corruption measures system in the areas of its functional competence.

The management, Employees of the Company, regardless of their position, are personally responsible for compliance with the principles and requirements of this Regulation and Applicable anti-corruption legislation, as well as for the actions (inaction) of their subordinates that violate these principles and requirements.

18. SOURCES OF INFORMATION

If any Employee has any questions regarding the content of this Regulation, interpretation of any of its provisions, implementation of the principles and anti-corruption measures specified in this Regulation, including the applicability of such principles and procedures in certain situations or business processes of the Company, and also doubts about the legality or ethics of their actions, the Employee can seek advice and clarification from the head of the Company.

19. EXTERNAL DOCUMENTS

Is current its positions of e developed on based on the requirements and principles of the Belarusian and international regulations and guidelines and methodological guidance of regulatory authorities. Main sources:

- The Law of the Republic of Belarus "On Combating Corruption",
- The Law of the Republic of Belarus "On public procurement of goods (works, services)",
- The Law of the Republic of Belarus "On Civil Service in the Republic of Belarus",
- Rules for the implementation of activities for the provision of legal services, approved. By the Resolution of the Ministry of Justice of the Republic of Belarus dated 01.22.2016 N 12
- Rules of professional ethics for persons engaged in the provision of legal services, approved. By the Resolution of the Ministry of Justice of the Republic of Belarus dated 08.06.2007 N 37
- The Criminal Code of the Republic of Belarus,
- Civil Code of the Republic of Belarus,
- The Code of the Republic of Belarus on Administrative Offenses,
- United Nations Convention "United Nations Convention against Corruption" (Concluded in New York on 31.10.2003),
- Council of Europe Convention No. 173 "On Criminal Law on Corruption (ETS No. 173)" (Done in Strasbourg on 27.01.1999),
- Bangalore Principles of Judicial Conduct (UN, The Hague, 26.11.2002),

- Basic Principles on the Role of Lawyers (UN, Havana, Cuba, 07.09.1990),
- and other specialized Belarusian and international regulatory legal acts.

When developing this Regulation, the recommendations and methodological guidelines contained in the manuals of specialized international organizations, as well as the best Regulations in the field of building the function of anti-corruption measures, were also used.