

APPROVED BY
General Director
"Synergy Research Group" LLC
Irina Koretskaya



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Anti-corruption Policy "Synergy Research Group" LLC

1. General Provisions

1.1. This Anti-corruption Policy (hereinafter referred to as the Policy) is developed by "Synergy Research Group" LLC in accordance with the provisions of Federal Law No. 273-FZ "On Countering Corruption" dated December 25, 2008 and Guidelines for development and implementation of measures to prevent and counter corruption approved by the Ministry of Labor and Social Protection of the Russian Federation.

1.2. The Policy of "Synergy Research Group" LLC (hereinafter referred to as the "Company") is a basic document that determines the main objectives, principles and directions of the anti-corruption activities. The purpose of the Policy is to coordinate activities of the Company's employees when implementing anti-corruption measures aimed at preventing, revealing and countering corruption offences at the Company.

2. Purpose and objectives of the Anti-Corruption Policy implementation

2.1. The purpose of the Policy is to develop and implement diversified and consecutive measures aimed at preventing and countering corruption offences in the Company activities, formation of anti-corruption awareness characterized by intolerance of the Company employees to corruption offences.

2.2. The objectives of the Policy are:

- forming a common understanding among the employees of the Company's vision of intolerance to corruption in all its forms and manifestations;
- minimizing the risk of involvement of the Company and its employees in corruption activities regardless of their job title;
- preventing corruption offences and ensuring responsibility for corruption offences;
- forming the corporate anti-corruption awareness;

- establishing the obligation of the Company employees to know and comply with the requirements of the Policy as well as the main provisions of the anti-corruption legislation.

3. Terms and definitions used in the Anti-corruption Policy

Corruption – abuse of official position, giving or receiving bribes, abuse of authority or any other illegal use of official position by the Company employee against the Company interests and the state for the purpose of gaining benefit in the form of money, material valuables, other property or monetized services, other property rights for the Company employee or third parties, or illegal provision of such a benefit to the named individual by other individuals. Corruption also means committing the above mentioned acts for or on behalf of a legal entity (Clause 1, Article 1 of Federal Law No. 273-FZ “On Countering Corruption” dated December 25, 2008).

Countering Corruption – the activities of the Company and its employees within their legal authority (Clause 2, Article 1 of Federal Law No. 273-FZ “On Countering Corruption” dated December 25, 2008) aimed at:

- a) preventing corruption which includes revealing and subsequent elimination of the corruption causes (prevention of corruption);
- b) revealing, preventing, suppressing, disclosing and investigating corruption offenses (countering corruption);
- c) minimizing and (or) eliminating the consequences of corruption offenses.

Bribery – receipt by the Company official, personally or through an intermediary, of money, securities, other property or illegal monetized services, granting other property rights for actions (inaction) in favor of a bribe-giver or persons represented thereby if such actions (inaction) are within the official’s legal authority, or if the official by virtue of official position may facilitate such actions (inaction), as well as for overall patronage or connivance at work.

Commercial subornation - illegal transfer of money, securities, any other property as well as rendering monetized services or granting other property rights to a person who performs managerial functions in the Company, for committing actions (inaction) in favor of the giver in connection with the official position held by this person.

Conflict of interest – a situation when the personal interest of the Company’s employee (direct or indirect) affects or might affect the proper performance of official (work-related) duties, and when a contradiction emerges or may emerge between the personal interest of the employee and the rights and legal interests of the Company, that can damage rights and legal interests, property and (or) business reputation of the Company the employee works for.

Personal interest of an employee – an interest of the Company’s employee associated with the possibility for the Company employee while performing official (work-related) duties to gain profit in the form of money, material valuables, other property or monetized services, other property rights for himself/herself or third parties.

Counterparty – any Russian or foreign legal entity or individual with whom the Company enters into contractual relations, excluding labor relations.

4. Key principles of the Company's anti-corruption activities

4.1. The key principles of the Company's Policy are:

- the principle of intolerance to corruption in all its forms and manifestations while performing daily activities including interactions with counterparties, representatives of public and local authorities, employees and other persons;
- the "Tone at the Top" principle. The Company Head and other top executives should establish ethical standards of intolerance to corruption in all its forms and manifestations at all levels setting an example through their behavior;
- priority of corruption preventive measures and moral principles of countering corruption;
- inadmissibility of establishing privileges and immunities that limit liability or complicate the procedure of bringing to responsibility a certain group of the Company employees who committed acts of corruption;
- inadmissibility of restricting access to information on cases of corruption and measures in the Policy;
- monitoring and control (the Company performs monitoring of corruption risks, including causes and conditions of corruption, during procurement activities for the company needs and of elimination of identified corruption risks);
- informing and training (the Company posts the Policy in the public domain on the Company website on the Internet, publicly declares intolerance to corruption, welcomes and encourages compliance with the principles and requirements of the present Policy by all counterparties and facilitates increase in the level of anti-corruption culture among employees by means of informing and training).

5. Scope of the Anti-corruption Policy and persons to whom it applies

5.1. The present Policy is to be used by the Company employees as related to compliance with the principles and requirements of the Policy as well as the key provisions of applicable anti-corruption legislation.

The Policy applies to the Company employees who have labor relations with the Company regardless of their job title and functions performed.

The principles and requirements of the Policy apply to counterparties as well as other parties in cases when respective obligations are established in agreements with them, in their internal documents or are implied by the current legislation.

6. Persons responsible for the implementation of the Anti-corruption Policy at the Company and their responsibilities related to corruption prevention and countering

6.1. Effective management of the anti-corruption activities is achieved by means of productive and operative interaction of the following participants:

General Director of the Company:

- approves the Policy;
- reviews and approves amendments and addendums to the Policy;
- appoints a designated person among the Company employees who is accountable for prevention of the corruption and other offences;
- establishes a committee for countering corruption at the Company;
- controls the overall results of the Policy implementation and application.

A designated person accountable for prevention of corruption and other offences:

- is responsible for organization of all measures aimed at implementation of the principles and requirements of the Policy;
- organizes delivery of trainings on corruption prevention and countering as well as individual consultations for employees;
- facilitates authorized representatives of regulatory authorities and law enforcement agencies in conducting inspections of the Company activities related to corruption prevention and countering;
- facilitates authorized representatives of law enforcement agencies in carrying out activities at the Company aimed at suppressing or investigating corruption offenses including law enforcement intelligence operations;
- implements measures to prevent corruption in the Company;
- performs control measures aimed at revealing corruption offences committed by the Company employees;
- receives notifications of cases of employees' inducement to commit corruption offenses, as well as of cases of corruption offences committed by the Company employees, and notifications of conflicts of interest of the Company employees;

A committee for countering corruption:

- performs corruption risks assessment;
- considers notifications of cases of employees' inducement to commit corruption offenses on behalf or for the benefit of another company, as well as of cases of

corruption offences committed by the Company employees, counterparties or other parties;

- performs assessment of results of anti-corruption activities and prepares relevant reports to the Company Head;
- implements measures to prevent corruption in the Company;
- performs measures to prevent and resolve conflicts of interest, considers notifications of conflicts of interest of the Company's employees.

7. Responsibilities of the Company employees related to corruption prevention and countering

7.1. The Company employees are obliged to:

- refrain from committing and (or) participating in corruption offences on behalf or for the benefit of the Company;
- refrain from behavior that can be interpreted by others as a willingness to commit or participate in a corruption offense on behalf or for the benefit of the Company;
- immediately notify a direct supervisor, a designated person accountable for the implementation of the Anti-corruption Policy, the Company management of cases of inducement of an employee to commit corruption offenses;
- immediately notify a direct supervisor, a designated person accountable for the implementation of the Anti-corruption Policy, the Company management of information that came to the knowledge of an employee on cases of corruption offenses committed by other Company employees, counterparties or other parties;
- inform a direct supervisor, a designated person accountable for the implementation of the Anti-corruption Policy, the Company management of possible or arisen conflict of interest of the Company employee.

8. List of anti-corruption measures implemented by the Company

8.1. Regulatory support, setting standards for behavior and declaration of intent:

- development and implementation of a Conflict of Interest Policy and a Conflict of Interest Declaration template;
- introduction of a standard anti-corruption clause into agreements related to the business activities of the Company;
- introduction of anti-corruption provisions into labor agreements of the Company employees;

- development and approval of other Company internal regulations for preventing and avoiding corrupt behavior.

8.2. Development and implementation of special anti-corruption procedures:

- introduction of a procedure to notify the employer of cases of inducement of employees to commit corruption offenses and a procedure for considering such notifications;
- introduction of a procedure to notify the employer of information that came to the knowledge of an employee on cases of corruption offenses committed by other employees, counterparties or other parties, and a procedure for considering such notifications;
- introduction of a procedure to notify the employer of arisen conflict of interest and a procedure for its resolution;
- periodic assessment of corruption risks to reveal areas that are highly exposed to such risks, and development of appropriate anti-corruption measures.