

APPROVED  
by the Board of Directors of  
EN+ GROUP IPJSC  
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**EN+ GROUP IPJSC**  
**POLICY ON CONFLICT OF INTEREST**

## TABLE OF CONTENTS

1.	General.....	3
2.	Key Terms and Definitions.....	3
3.	Principles.....	5
4.	Group's Basic Rules Regarding Conflict of Interest .....	5
5.	Disclosure of Conflicts of Interest .....	7
6.	Resolving Conflicts of Interest .....	10
7.	Confidentiality .....	11
8.	Compliance with the Policy and Liability .....	11
9.	Hotline .....	11
	Appendix 1.....	12
	Appendix 2.....	13

## **1. General**

- 1.1** The Conflict of Interest Policy (the “Policy”) contains general requirements of IPJSC EN+ GROUP and companies of the EN+ group other than UC Rusal, IPJSC group companies (the “Company” and the “Group”, respectively) aimed at preventing and resolving Conflicts of Interest of Employees, defines standards and procedures for Employees and legal entities of the Group to be followed in the event of possible or existing Conflicts of Interest, including procedures for notifying the Company of Conflicts of Interest and resolving Conflicts of Interest.
- 1.2** The Policy is developed in accordance with the applicable laws of the Russian Federation, international laws and in furtherance of the Anti-Bribery and Corruption Policy and the Corporate Code of Ethics (the “Code of Ethics”) that shall prevail in case of any discrepancies.
- The provisions of the Policy are valid to the extent that they do not contradict the applicable law.
- 1.3** The key objectives of the Policy are as follows:
- Setting requirements for the conduct of Employees, compliance with which would minimise risks of violations and the risk of decisions being made under the influence of Conflicts of Interest;
  - Creating a unified system to manage Conflicts of Interest in all companies of the Group.
- 1.4** The provisions of the Policy apply in the companies of the Group.
- 1.5** Employees should be guided by the principles of honesty, openness and transparency; they should be free from Conflicts of Interest and shall strive to always remain objective in professional relations.
- Employees should be reasonably prudent and vigilant in identifying any existing and potential Conflicts of Interest and strictly comply with the Group's requirements when resolving Conflicts of Interest.

## **2. Key Terms and Definitions**

**Conflict of Interest** – means any circumstances or a situation, where a personal (direct or indirect, including financial or any other) interest of an Employee and/or third parties they are related to prevent or may prevent the Employee from proper performance of their official or job duties in the interests of the Group, including, where relevant, any such circumstances and situations defined in Article 10 of Federal Law No. 273-FZ “On Combating Corruption” dated 25 December 2008.

In particular, a Conflict of Interest is understood as a material or financial interest of an Employee, their spouse or any Relatives in the results of an enterprise that is a direct or indirect Counterparty of the Group company.

A Conflict of Interest exists in case of direct or indirect engagement of Counterparties, which creates knowingly unfavourable conditions for the Group and/or work with other Counterparties and parties related to them (both individuals and legal entities).

A Conflict of Interest also arises if an Employee directly or indirectly facilitates establishing business relations with the above Counterparties and persons or organizations related to them.

A Conflict of Interest may arise, including, without limitation:

- between the interests of two or more Counterparties;

- between the interests of a Group company and those of a Counterparty/Counterparties;
- between the personal interests of the Employees and interests of a Counterparty/Counterparties;
- between the interests of the Employees and interests of the Company/a Group company;
- between the interests of a Manager and his/her subordinates in case of personal or Family Relations;
- between the interests of an Ethics Officer/ a member of the Ethics Committee and the interests of an Employee/ the Employees in case of personal or Family Relations.

Every Conflict of Interest (including a potential one) shall be considered taking into account the actual circumstances and details, while decisions with respect to Conflicts of Interest shall be taken by collegiate body – Ethics Committee.

**Family Relations** – means relations among persons that arise as a result of the registration of marriage (or another fact giving rise to marriage relations in accordance with applicable legislation) of a Relative: relations among a spouse and Relatives of another spouse, as well as among Relatives of the spouses.

**Counterparties** – means persons who have any legal relationship with a Group company, including but not limited to suppliers, contractors, customers, regulators, agents, clients, consultants, governmental authorities, etc.

**Manager** – means the General Director (Chief Executive Officer); Deputy General Director (Deputy Chief Executive Officer); a member of the Executive Committee; a member of the Board of Directors; Head of a Department/Office/other unit (service) of the Company or any other Group company, and persons performing their duties.

**Employee** – means an individual who has employment relations with the Company or any other Group company.

**Relatives** – means a spouse, parents, children, spouses of children, adoptive parents, adopted children, siblings.

**Professional Dynasties** – for the purpose of applying this Policy, professional dynasties are understood as work at one Group company of two or more Relatives, mainly of working professions and different generations, who hold positions analogous and/or similar in their professional competences, skills and abilities, contributing to the succession of professional knowledge, experience and workmanship, who are not directly subordinate to each other and have no right to make administrative and managerial decisions with respect to each other.

**Ethics Officer (EO)** – means an Employee appointed to this position by an internal order, whose duties are to ensure the implementation of the Code of Ethics in the companies of the Group with a view to disseminate the contents of the Code of Ethics and provide support to Employees in its application, as well as in resolving complicated ethical situations within the companies of the Group. In case that a Group company does not have an appointed Ethics Officer, the said functions shall be performed by the Company's Ethics Officer, and unless stipulated herein, any reference to an "Ethics Officer" shall be interpreted accordingly.

**Conflict of Interest Declaration** – means information about whether or not an Employee has personal circumstances that may result in a Conflict of Interest during the performance of his/her job in the Group company submitted in accordance with the form in the Appendix 2 hereto.

**Ethics Committee** – means a committee created by a Group company to resolve controversial issues, exercise control over compliance with the corporate ethics principles and rules, consider and work out recommendations regarding Conflict of Interest resolution. General Director (chief executive officer) of each Group company shall resolve on the

number of members of the Ethics Committee and select members to the Ethics Committee out of the Group company's Employees. In case that a Group company does not have an Ethics Committee, the said functions shall be performed by the Company's Ethics Committee, and unless otherwise stipulated herein, any reference to an "Ethics Committee" shall be interpreted accordingly.

### **3. Principles**

- 3.1** Compliance with the Group's requirements with respect to a Conflict of Interest, specifically the requirements of the Code of Ethics and this Policy.
- 3.2** Obligatory disclosure of information about any Conflict of Interest or the possibility of a Conflict of Interest by Employees.
- 3.3** Individual consideration and assessment of the risk materiality for the Group of each Conflict of Interest and resolving each Conflict of Interest on a case-by-case basis.
- 3.4** Confidentiality of the information disclosed in Conflict of Interest cases during the resolution of Conflicts of Interest.
- 3.5** Maintaining a balance between the Group's interests and private interests of Managers and Employees during the resolution of a Conflict of Interest.

### **4. Group's Basic Rules Regarding Conflict of Interest**

- 4.1** In its relations with Employees, the Group companies strive to comply with all requirements of the labour laws and terms and conditions of employment agreements, respecting the personal freedom and rights of the Employees to engage in legal financial, business, political and other activities outside their main job.

The Group companies give each Employee equal opportunities, however the Group companies believe that each Employee shall act exclusively in the interests of the Group when performing their job and make every effort to avoid any Conflict of Interest and report any possible Conflicts of Interest.

- 4.2** The Group understands that it is impossible to completely avoid Conflicts of Interest. Therefore, to protect Employees from any possible incorrect actions, each Conflict of Interest should be disclosed and resolved as soon as possible.
- 4.3** Managers of the companies of the Group shall promote a culture of honesty, understanding that awareness of potential Conflicts of Interest is the responsibility of all Employees, and take all possible steps to manage such Conflicts of Interest accordingly.

Employees shall understand and be aware of the obligations and liability that they have to the Group in the context hereof.

- 4.4** If there is a Conflict of Interests or even possibility of such a Conflict of Interests, Managers and Employees shall not directly or indirectly participate in or influence on the decision or situation arising in the course of financial and business activities of the company of the Group, provided that they are personally involved in such a Conflict of Interest (possible Conflict of Interest).
- 4.5** The Group companies shall endeavour to ensure that the Ethics Officer and members of the Ethics Committee are independent in the performance of their employment and official duties. In particular, their independence may be impaired if they find themselves in a situation of inconsistency (contradiction, conflict) between their duties under the Policy and their other employment and job responsibilities.
- 4.6** In order to minimise the risks related to Conflicts of Interest, the Group companies expect from its Employees that without the prior notice to the Ethics Committee and,

if permitted by applicable law, obtaining the prior written permit they will not perform the following actions:

- compete with companies of the Group;
- take advantage of business opportunities, of which the Employee has become aware as part of their job for the company of the Group or use of any property and/or information of the company of the Group, in his/her personal interests or in the interests of third parties;
- acquire or retain a proprietary or other personal interest in any of the assets of the company of the Group or any of its Counterparties;
- hold a management position, including being a member of the board of directors or an executive body of a Counterparty and/or competitor of the company of the Group or act as a consultant, agent or other representative of such legal entity;
- participate for the purpose of gaining any personal benefit in a transaction, in which the company of the Group is one of the parties;
- disclose any insider information of the company of the Group to third parties in his/her personal interests or in the interests of third parties;
- participate in any financial, business, social or political activity outside of employment in the company of the Group, which contradicts its requirements for the Employee's working time or which involves the use of assets and resources of the company of the Group, as well as information that is the property of the company of the Group, obtained by the Employee while working for the company of the Group;
- employ any Relative of an Employee of the Chief Executive Officer / Director / Deputy Director level or allow for any such persons to continue to work for the same company of the Group;
- employ any Relative of the head of the HR service or allow to continue to work for the same company of the Group;
- employ an Employee under the administrative or functional subordination of his/her Relative irrespectively of the number of subordination levels between them or allow for such person to continue to work;
- be directly subordinate to Relatives and/or make any administrative and managerial decisions and/or make decisions in the exercise of the duties of the Ethics Officer or the member of the Ethics Committee with respect to their Relatives (or persons who are in Family Relations and in other personal relations, including cases falling within the term of Professional Dynasties).

**4.6** The Group companies and their Employees shall be equally interested in avoiding Conflicts of Interest with each other and in light of that both Employees and the Company:

- **shall** be guided solely by the interests of the Group companies when making decisions on business matters arising in connection with their work for the Group companies;
- **guarantee** that their personal interests, family ties, friendship or other relations, personal likes and dislikes will not influence business decisions;
- **avoid** any situations or circumstances that may result in a Conflict of Interest between them and the Group companies;
- **refrain from competition** with the Group companies, including, without limitation, competition on any business transactions;

- **refrain from using** the Group companies' assets, including its insider information, as well as their position in the Group company and/or business opportunities arising in connection with their work for the Group company, to pursue their private interests, including financial interests;

At the same time, Employees shall strive to identify any Conflict of Interest between themselves and the Group company in due time, report any such Conflict of Interest in due time to the Company and take an active part in resolving them.

- 4.7** The Group companies, their Managers and Employees, who are interested in avoiding Conflicts of Interest, alongside with the provisions hereof, are equally obliged to follow relevant provisions of the Code of Ethics.

## **5. Disclosure of Conflicts of Interest**

- 5.1** The Company expects that all Employees will immediately and fully disclose (declare) all cases of Conflicts of Interest, disclose information about private circumstances that create or may create at least the appearance of such a Conflict of Interest.

- 5.2** In its relations with Employees, the Group companies will presume that before making a business decision the respective Employee has made sure that there is no Conflict of Interest, or has done everything in his/her power to avoid a possible Conflict of Interest, or has notified the Group company in advance of a possible Conflict of Interest in order to eliminate it.

- 5.3** Information about Conflicts of Interest shall be disclosed in the format of a Conflict of Interest Declaration.

- 5.4** The list of positions of Employees associated with corruption risks who are obliged to file an annual Declaration of a Conflict of Interest is contained in Appendix 1 and may be adjusted by separate local regulations in the companies of the Group.

- 5.5** The Company establishes the following procedure for disclosing information about Conflicts of Interest:

- **initial disclosure** of Conflict of Interest information upon employment;
- **one-time disclosure** of Conflict of Interest information, as situations (circumstances) occur that give rise or have given rise to a Conflict of Interest, and disclosure of conflicts detected by internal audits or inspections of the resource protection service; one-time disclosure is also carried out when the Employee is appointed/transferred to a position included in the list of positions of Employees who are obliged to file a Conflict of Interest Declaration (clause 5.4)
- **annual disclosure** of Conflict of Interest information as of December 31 of the relevant year;

- 5.6** Initial disclosure of Conflict of Interest information upon employment.

5.6.1 When applying for a job in a company of the Group, a candidate for a vacant position is recommended to disclose to the HR service of the Group company information about the presence/absence of personal circumstances that may lead to Conflict of Interest between the candidate and the Group company;

5.6.2 If the candidate meets the requirements raised by the Group company, an employment agreement will be made with the candidate and the Conflict of Interest Declaration completed by the Employee will be kept in the HR service of the respective Group company in the personal file of the new Employee in accordance with the personal data protection requirements.

**5.7** One-time disclosure of Conflict of Interest information, as situations (circumstances) occur that result, have resulted or may result in a Conflict of Interest

5.7.1 If there is a situation that results in a Conflict of Interest, the Manager or Employee, regardless of his/her position, is recommended to complete the Conflict of Interest Declaration, as well as inform his/her line manager of the Conflict of Interest;

5.7.2 If there is a situation that results in a Conflict of Interest involving a member of the Ethics Committee, that Employee is advised to complete the Conflict of Interest Declaration and inform the Ethics Officer and the Ethics Committee of the Conflict of Interest. If there is a situation that results in a Conflict of Interest involving the Ethics Officer, such Ethics Officer is advised to complete the Conflict of Interest Declaration and inform the Ethics Committee and the Company's Ethics Officer, and in a situation involving the Company's Ethics Officer, the latter is advised to inform the Ethics Committee of the Company after completing the Conflict of Interest Declaration, unless otherwise provided for by the Company's Charter or internal documents;

5.7.3 If an internal audit or inspection conducted by the Group company's resource protection service (if the Group company has such a service) discovers any situations, which are a Conflict of Interest, regardless the position of the person with respect to whom the situation not declared by the Employee him/herself is discovered, a representative of the control and internal audit service or a representative of the resource protection service will transfer the information to the Ethics Officer with the note 'undeclared conflict of interest'.

If a Conflict of Interest is identified in relation to the Ethics Officer or the General Director of a Group company, the information is communicated to the Ethics Committee as well as to the Company's Ethics Officer, and in a situation where a Conflict of Interest is identified in relation to the Ethics Officer of the Company, the information is communicated to the Ethics Committee of the Company, unless otherwise provided for in the Company's charter or internal documents.

5.7.4 Before resolving the conflict situation and receiving an official written decision, the Manager or Employee shall refrain from making any decisions with respect to the situation that represents a Conflict of Interest;

5.7.5 Within 5 business days after completion of the Conflict of Interest Declaration by the Employee or receipt of the information about the discovered Conflict of Interest following inspections, the Ethics Officer will together with the HR service and legal service (if necessary) with the participation of the resource protection service (if the Group company has such a services) prepare recommendations for how to best resolve the Conflict of Interest and transfer them to the Ethics Committee for approval, which makes a final decision;

5.7.6 When considering a transaction that may give rise to a Conflict of Interest, a decision to approve it will be made only subject to all risks arising in the Conflict of Interest situation and provided that such risks can be managed;

5.7.7 If a probable Conflict of Interest is discovered, first of all, it is necessary to define whether the risks related to it are significant or unlikely. If it is decided that the risks are significant and neither the Employee involved in the Conflict of Interest, nor his/her Manager will be able to make impartial decisions in this situation, then it is necessary to submit the issue to the Ethics Committee for consideration, and, if necessary, suspend all work on the transaction related to the Conflict of Interest;



- 5.7.8 Disciplinary measures against Employees who evade declaring situations that give rise to Conflicts of Interest detected by inspections will be defined by a decision of the Ethics Committee in accordance with terms and conditions of the employment agreement (contract), labour laws and/or other applicable laws;
- 5.7.9 If the information on a Conflict of Interest involving a member of the Ethics Committee is received, within 5 working days from the date of receipt of such information, the Ethics Officer will together with the HR service and legal services (if necessary) of the relevant Group company with the participation of the resource protection service (if the Group company has such a services) prepare recommendations for how to best resolve the Conflict of Interest and transfer them to the Ethics Committee for approval, which makes a final decision. This decision shall made by disinterested (not involved in the Conflict of Interest in question) members of the Ethics Committee.
- 5.7.10 If the information on a Conflict of Interest involving the Ethics Officer is received, disinterested (not involved in the Conflict of Interest in question) members of the Ethics Committee shall make a decision for how to best resolve the Conflict of Interest. The Ethics Officer whose Conflict of Interest is being considered may be invited to a meeting of the Ethics Committee to give explanations.
- 5.7.11 Disciplinary measures against the Ethics Officer or the member of the Ethics Committee who evade declaring situations that give rise to Conflicts of Interest detected by inspections will be defined by a decision of the Ethics Committee in accordance with terms and conditions of the employment agreement (contract), labour laws and/or other applicable laws.
- 5.7.12 Having considered the situation that gives rise to a Conflict of Interest, the Ethics Officer / HR service will send the decision of the Ethics Committee to the Employee, and a copy of the document will be transferred to the Company's Ethics Officer and the HR service of the Company;
- 5.7.13 The Conflict of Interest Declaration together with the relevant decision will be kept in the personal file of the Employee in accordance with applicable personal data protection requirements.

## **5.8 Annual disclosure of Conflict of Interest information.**

- 5.8.1 By December 10 of the respective year, the Ethics Officer together with the HR service (HR service if there is no Ethics Officer in the company of the Group) of each company of the Group shall make a list of Employees based on the list of positions specified in Appendix 1 who shall complete the Conflict of Interest Declaration for the relevant year;
- 5.8.2 By December 15 of the respective year, the Ethics Officer will together with the HR service (HR service if there is no Ethics Officer in the company of the Group) of each company of the Group give notices to the Employees (in accordance with the prepared list) of the need to complete the Conflict of Interest Declaration.
- 5.8.3 By December 31 of the respective year, the Employees complete the Conflict of Interest Declaration in their personal accounts on the Company's information portal;
- 5.8.4 As of January 31 of the next year, the Ethics Officer reconciles the Conflict of Interest Declarations completed by the Employees for compliance with the

prepared list of declarants. The Ethics Officer generates an automated report on the Employees who have a Conflict of Interest;

- 5.8.5 By March 1 of the next year, the Ethics Officer organises, if necessary, a meeting of the Ethics Committee to make decisions on issues arisen following the annual declaration of Conflicts of Interest.

If issues involve members of the Ethics Committee or the Ethics Officer, decisions shall be made by disinterested (not involved in the relevant Conflict of Interest in question) members of the Ethics Committee.

5.8.6. By March 1 of the year following the year of the completion of the Conflict of Interest Declarations by the Ethics Officers of the Group companies, the Company's Ethics Officer shall, if necessary, arrange a meeting of the Ethics Committee of the relevant Group Company to make decisions on issues resulted from declaring Conflict of Interest, or arrange a meeting of the Ethics Committee of the Company to make the relevant decisions.

## **6. Resolving Conflicts of Interest**

- 6.1** The Group strives to resolve any Conflicts of Interest declared by its Employees in a way that takes into account the interests of both the Group company and its Employees.

- 6.2** Any information about a Conflict of Interest will be carefully checked by the Ethics Officer together with representatives of the HR service, resource protection service, control and internal audit service and legal service to assess the severity of the risks arising for the Group as a whole and the relevant Group company and choose the most appropriate form to resolve the Conflict of Interest.

The Company's Ethics Officer will verify information about a Conflict of Interest involving the Ethics Officer of a Group company. The Ethics Committee of the Company will verify the information regarding the Company's Ethics Officer.

- 6.3** The Group company, after conducting a check and taking other relevant actions, considers as a Conflict of Interest such situations (circumstances or relations) that, in the opinion of the Employee who has declared them, create or may create a Conflict of Interest with respect to the Group company, but allows making a business decision/transaction, provided that the arising risks can be managed.

- 6.4** The Group companies use the following options for resolving Conflicts of Interest:
- restricting the Employee's access to specific information that may relate to the Employee's private interests;
  - voluntary refusal of the Employee or banning him/her (permanently or temporarily) from participation in the discussion and decision-making process on issues that are or may be influenced by the Conflict of Interest, including negotiations with Counterparties;
  - revising and changing the scope of duties and job functions of the Employee;
  - transferring the Employee to a position that implies the performance of job duties not related to the Conflict of Interest;
  - dismissal of the Employee for disciplinary offences if there are grounds in the manner and on the conditions provided for by the labour laws of the Russian Federation or labour laws of foreign jurisdictions;
  - transferring the property, which constitutes the subject matter of a private interest giving rise to Conflict of Interest, to trust management;

This list is not exhaustive. In every specific case of settling a Conflict of Interest, other Conflict of Interest resolution forms may be found upon agreement of the Group company and the Manager or the Employee who has disclosed the Conflict of Interest.

## **7. Confidentiality**

With respect to confidentiality, the Group companies are governed by the provisions of the Code of Ethics.

The Group companies guarantee that the Conflict of Interest disclosure process and the subsequent resolution of the Conflict of Interest will be confidential to the extent possible.

The Group companies consider unacceptable any actions that have the nature of revenge and/or persecution of the Employee who has properly disclosed information about the existence of a Conflict of Interest.

## **8. Compliance with the Policy and Responsibility**

- 8.1** Compliance with the requirements of this Policy is an indispensable and unconditional duty of every Employee, regardless of his/her job position.
- 8.2** The Group companies consider any intentional concealment and/or delayed or incomplete disclosure of information on Conflict of Interest by an Employee for any reasons to be an abuse of trust and deception of the Group company, regardless of whether such concealment has affected the Group company's activities or not.
- 8.3** A violation of any requirements of this Policy by an Employee in the course of his/her work expressed in non-fulfillment/improper fulfillment of his/her job duties, and/or any damage caused to the Group, or an administrative offence or a criminal offence, may result in applying disciplinary and other liability measures with respect to such Employee, including dismissal, in accordance with the applicable laws of the Russian Federation or applicable laws of foreign jurisdictions.

## **9. Hotline**

The Company expects that Employees, as well as any other individuals or legal entities connected with the Group through business or partner interests, which have reasons to believe that they have a Conflict of Interest or any requirements of this Policy are violated, will inform of any known facts or suspicious regarding a Conflict of Interest by sending a message to the professional ethics and fraud prevention Hotline:

- By calling **8 800 234 5640** (FREE CALLS WITHIN RUSSIA);
- By calling: **+7 495 221 33 72** (for international calls);
- By sending a message to the following email address: **signal@enplus.ru**

The Company guarantees complete anonymity, confidentiality and protection of the sender's personal interests.

The Company also guarantees that all messages will be considered.

A written reply will be given if the sender's identity is specified.

**List of positions of Employees that Shall Submit Conflict of Interest Declarations**

<b>Units (services) of a Group company</b>	<b>Position</b>
All services of the unit level and higher	Managers and their deputies, all Managers reporting directly to the CEO, CEO, a member of the Executive Committee
Security Service / Resource Protection Service	All Employees
Control and Internal Audit Service	All Employees
Procurement / Supply / Support Service	All Employees
Sales / Service Team	All Employees
Capital Construction / General Construction Works Service	All Employees
Bankruptcy Service	All Employees
HR Service	All Employees
PR Service	All Employees
Ownership / Property Service	All Employees
IT	All administrators who have full access to workstations of Employees or servers or accounting data bases
Accounting staff	Chief Accountant / Deputy Chief Accountant, Accountants for procurement, capital construction, counterparty payment and payroll sections
Shop	Managers and their deputies
Motor vehicles unit	Managers and their deputies
Base	Managers and their deputies
Laboratories	Managers and their deputies
All services	All Employees who directly work with external providers
All services	All Employees who are members of bidding commissions, tender committees and any other similar formations

### Conflict of Interest Declaration

This Declaration contains two sections to be completed by the Employee. The Employee is obliged to disclose information about each real or potential Conflict of Interest. This information is subject to further comprehensive verification by the Company's authorised body in accordance with the prescribed procedure.

**This document is confidential (after completion) and intended for the Company's internal use only [•] (hereinafter, the “company”). The content of this document may not be disclosed to any third parties, except as required by the laws, and may not be used by them for any purpose.**

<b>Full name</b>	
<b>Position</b>	
<b>Employee's Taxpayer Identification Number (INN)</b>	
<b>Organisation</b>	
<b>Date of completion</b>	_____, 20_____
<b>The Declaration covers the time period</b>	from _____ to _____



***Before completing this Declaration, I have read and understood the Conflict of Interest Policy and the Corporate Code of Ethics of EN+ GROUP. The capitalized terms used herein have the meanings as defined in the said documents.***

\_\_\_\_\_  
(signature)

\_\_\_\_\_  
(full name)

Please read the questions below carefully and answer 'Yes' or 'No' to each of the questions.

**The answer 'YES' does not necessarily mean that there is a Conflict of Interest, but it reveals an issue that deserves further discussion and consideration by the company's authorised body.**

When completing the Declaration, please note that all the questions raised apply **not only to you, but also to your spouse (or partner in civil marriage), parents (including adoptive ones), children (including adopted ones), siblings.**

#### Section 1

Question	Answer (Yes/No)
<b>External interests or assets</b>	
1. Do you, your Relatives or persons acting in your interests hold, whether directly or as a beneficiary, shares (participatory interests or stakes) or any other financial interests:	
1.1. In assets of the company or any other entity belonging to En+ Group?	
1.2. In other commercial entity that is in business relations with the company (a Counterparty of the company)?	

Question	Answer (Yes/No)
1.3. In a commercial entity that seeks to build business relations or is negotiating with the company?	
1.4. In a commercial entity that is a party to a lawsuit or arbitration with the company?	
<b>2.</b> Are/were you, your Relatives or persons acting in your interests members of managerial bodies (Board of Directors or Executive Committee) or managers (Directors, Deputy Directors, etc.), as well as employees, consultants, agents or attorneys:	
2.1. In a commercial entity that is in business relations with the company (a Counterparty of the company)?	
2.2. In a commercial entity that seeks to build business relations or is negotiating with the company?	
2.3. In a commercial entity that is a party to a lawsuit or arbitration with the company?	

**If the answer to clauses 1-2 is 'Yes', please complete the following fields:**

Company name (INN)	Full name of the Employee/ Relative	Form and participatory interest (share in the asset)/position/occupation	Relation degree

Personal interests and honest business conduct	
<p><b>3.</b> Are/were any of your Relatives or persons acting in your interests a Public Official?</p> <p><i>'Public Official' (the full definition may be found in the Anti-Bribery and Corruption Policy) means an individual who holds a position in federal state authorities, public authorities of the federal territory, public authorities of the constituent entities of the Russian Federation, regardless of the branch of power (legislative, executive or judicial), of the rank held and territorial affiliation, or a person acting on behalf of such a person.</i></p>	
<p><b>4.</b> Does any of your Relatives or persons acting in your interests hold an office that allows him/her to direct or influence procurement decisions of any Governmental and State Authorities?</p> <p><i>For the purposes of this Declaration, 'Government and State Authorities' means: (1) any authority or institution of any national, regional or local government; (2) any company or organisation owned fully or partially by the government or controlled by it (for example, public oil companies, funds, unitary enterprises and healthcare systems controlled by the state);(3) any political party.</i></p>	
<p><b>5.</b> Do you have any Relatives or Family Relations inside the company?</p>	
<p><b>6.</b> Did you participate in any transaction on behalf of the company, where you had (even indirectly) a personal financial interest?</p> <p><i>For example, as a decision-maker, a person responsible for the performance of a supply/service agreement, approving acceptance of completed work or approving payment documents, etc.</i></p>	

<p><b>7.</b> Did you ever receive cash or anything of value that could be interpreted as illegal or violating the company's ethical principles?</p> <p><i>For example, a payment or gift from a Counterparty for your assistance in making a transaction with the company?</i></p>	
<p><b>8.</b> Did you ever transfer cash or anything of value (in particular, approve or ask for such transfer) that could be interpreted as illegal or violating the company's ethical principles?</p> <p><i>For example, a payment to a Counterparty for services provided to the company that, under current market conditions, exceeds the amount of remuneration reasonably due for the services actually received by the company?</i></p>	
<p><b>9.</b> Did you ever disclose any confidential information (plans, programmes, financial data, formulas, technologies, etc.) that were owned by the company and became known to you when performing your job duties?</p>	
<p><b>10.</b> Did you ever receive incomes from commercial or governmental structures in the period of your work for the company?</p> <p><i>For example, you provided services under a civil agreement on one occasion, etc.</i></p>	
<p><b>11.</b> Do you participate in any activity that competes with the company's interests in any form?</p> <p><i>For example, participation in third-party projects, projects of competitor companies, part-time work, your own business, etc.</i></p>	
<p><b>12.</b> Are you aware of any other circumstances not listed above that cause or may result in a Conflict of Interest or that may give your colleagues and Managers an impression that you make decisions under the influence of a Conflict of Interest?</p>	

**If the answer to clauses 3-12 is 'Yes', please provide details below for their full consideration and assessment of the circumstances.**


*In case of a situation that gives rise to a Conflict of Interest when performing my job duties, I undertake to immediately inform my line manager of such circumstances in writing.*

*I undertake to inform my line manager of any relevant changes in my personal circumstances during the year after the signing of the relevant declaration.*



**I hereby give my consent to verifying the above information and using it during internal investigations in the company. I also declare that the above information contains the exhaustive description of the direct or indirect relations currently known to me that may result in a Conflict of Interest in the course of my activities in the company. I understand that concealing and/or untimely or incomplete disclosure of such information about a Conflict of Interest for any reason will be considered by the Company as improper information, whether this has affected the company's activities or not.**