**Questionnaire for Participants**

**Form-1**

Participant name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

| **Name** | **Information about the Participant** | | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Form of incorporation and business name (full and abbreviated) |  | | | | | | | |
| Founders (list the names and forms of incorporation, or full personal names, of all founders whose share of authorized capital exceeds 10%) |  | | | | | | | |
| OGRN (date and number, issuing authority) |  | | | | | | | |
| INN |  | | | | | | | |
| KPP |  | | | | | | | |
| Registered address |  | | | | | | | |
| Mailing address |  | | | | | | | |
| Form of incorporation and business name of the Participant’s subsidiaries and/or affiliates (in which ownership stake exceeds 10%) |  | | | | | | | |
| Banking details (name and address of the bank, number of the Participant’s settlement account with the bank, bank’s phone number, otherbanking details) |  | | | | | | | |
| Participant’s contact info | **Phone** | | | **E-mail** | | | **Fax** | |
|  | | |  | | |  | |
| Full name of the Participant’s executive granted signing rights pursuant to the Participant’s constituent documents, specifying position and contact phone number |  | | | | | | | |
| Participant’s representative authorized by power of attorney to sign the Agreement and TB | **Full name** | | **Position** | | | **Phone** | | **E-mail** |
|  | |  | | |  | |  |
| Full name of the Participant’s Chief Accountant |  | | | | | | | |
| Participant’s representative responsible for participation in the Procurement | **Full name** | **Position** | | | **Phone** | | | **E-mail** |
|  |  | | |  | | |  |

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

*(signature, seal) (position, full name)*

“\_\_\_\_”\_\_\_\_\_\_\_\_\_\_\_\_ 201\_

*Completion instructions:*

*1. Participant must specify its business name (incl. form of incorporation) and address.*

*2. Participant must complete all fields of the above table. Where certain information is not applicable, enter “N/A”*

*3. Line 8 “Banking details…” should specify the particulars that will be used under conclusion of the Agreement.*

**QUESTIONNAIRE**

**FOR PARTICIPANTS/CONTRACTORS**

**Form-2**

|  |
| --- |
| **Contractor’s name:** |
| **Contractor’s INN/OGRN:** |
| **Completion date:** |
|  |

***Valued Contractor!***

For the purposes of improving cooperation with contractors and minimizing the risk of financial losses stemming from the unscrupulous or unlawful actions of contractors, damage to MTS PJSC business reputation, the violation or entanglement of MTS PJSC in the violation of applicable anticorruption legislation and encouraging the use of the best business practices, implementation of regulator recommendations and the establishment of long-term partnerships, the Company follows a procedure for the collection and study of information concerning potential and existing contractors.

The procedure for assessing the existence/absence and degree of risk associated with cooperating with a particular contractor, as well as the subsequent assignment to the contractor of the appropriate grade and class, is based on careful study of the information provided both by the contractor itself, as well as that obtained independently by the Company.

The assigned grade and class of the contractor’s business operations, including but not limited to financial reliability and business reputation will be considered moving forward in decision-making on entering into contractual relations with the potential contractor, determining the strategy for cooperating with the contractor, and prolonging or expanding relations with the contractor.

This procedure is implemented according to MTS PJSC internal regulations, in full compliance with applicable Russian Federation legislation.

**Criteria for evaluating a potential or existing contractor**

The following criteria are taken into consideration in the study of the contractor’s information and its subsequent grading and classification:

* Existence of all requested (as applicable) registration, entitling and supporting documents;
* Existence of the labor, physical, intellectual, technical and technological resources required for the performance of assumed obligations;
* Absence (pertaining to the contractor) of liquidation/bankruptcy procedures or a decision on the legal entity’s winding-up;
* Provision of the information requested within the scope of the contractor’s evaluation (including the required supporting documents);
* Provision, prior to the signing of the agreement and in the course of its performance (in the event of changes to the relevant information), of the list of entities whose resources are to be used in the performance of contractual obligations, specifying said resources and enclosed with supporting documents;[[1]](#footnote-1)
* Completion of all forms constituting an integral part of the Questionnaire. Provision of the confirmations and authorizations requested in the “Certificate of Compliance with MTS PJSC Requirements” pertaining to business ethics and compliance with anticorruption legislation”;
* Absence in any of the Questionnaire’s forms of any false information whatsoever;
* Absence of the contractor in the FAS Russia Register of Unscrupulous Suppliers;
* Absence among the contractor’s owners and/or employees of individuals simultaneously holding state (municipal) positions and/or burdened by a conflict of interest**[[2]](#footnote-2)** under the performance of their job duties;
* Absence of information pointing to the violation (possible violation or involvement in the violation) of the norms of applicable tax and customs legislation, whether by the contractor itself or by the entities engaged thereby for the performance of its contractual obligations, as confirmed by the respective acts of the competent state agencies of the Russian Federation or those of other countries;
* Absence of information pointing to the violation (possible violation or involvement in the violation) of Applicable Anticorruption Legislation**[[3]](#footnote-3)** by the contractor, certain of its employees, owners, management-body members and/or affiliates, as confirmed by the respective acts of the competent state agencies of the Russian Federation or those of other countries.

In the event of the discovery of such information:

1. currently under review by the competent state agencies of the Russian Federation or those of other countries;

or

1. not as yet reviewed by the competent state agencies of the Russian Federation or those of other countries;

The Company reserves the right to refrain from concluding the respective agreement until a final decision is made by the competent state agency with respect to the information under its review or the information referred thereto for review at the Company’s initiative.

Non-compliance with any of the above-listed criteria may serve as grounds for the supplier’s downgrading, the refusal of agreement conclusion with the potential contractor and/or the possible termination of contractual relations with an existing contractor.

**Confidentiality statement**

MTS PJSC undertakes to refrain from disclosing, discussing the substance, providing copies, publishing and/or otherwise disclosing to third parties the information provided by the contractor in this Questionnaire without the contractor’s prior written consent, as well as to take all measures and use all lawful means of protecting the information contained in this Questionnaire and preventing its unauthorized disclosure. MTS PJSC shall use the information contained in this Questionnaire solely for the purposes of ensuring MTS PJSC’s compliance with applicable legislation and supporting its procurement procedures.

**Provision of information**

This Questionnaire is sent to existing and potential MTS PJSC contractors (procurement-procedure participants) for the purposes of collecting background information and obtaining clarifications on particular data points.

The Questionnaire contains the list of questions minimally required for an objective evaluation of the parameters of cooperation with the contractor, and has been designed with the aim of ensuring compliance with the requirements of anticorruption legislation applicable to MTS PJSC. Applicable Anticorruption Legislation shall be understood to mean both Russian Federation legislation, as well as the anticorruption legislation of other countries whose individual provisions are applicable to MTS PJSC by virtue of the Company’s affiliation or public status.

The contractor must answer all of the questions listed below. In the event that the contractor’s answer does not match any of the suggested answer options, the appropriate answer should be provided in free form (lines may be added where necessary).

Should any questions arise in the provision of the information requested by MTS PJSC, please get in touch with your MTS PJSC contact person.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| 1. **Is your organization a public company (i.e. a company whose shares are listed with a stock exchange in any jurisdiction) or a subsidiary/affiliate of a public company?**   ⃝ Yes ⃝ No  **If “Yes**,**”** provide the following details on your organization or the public company of which your organization is a subsidiary/affiliate:   |  |  | | --- | --- | | **Full name** |  | | **Stock exchange** |  | | **Ticker symbol** |  | |
| 1. **Has your organization adopted an internal regulation defining the organization’s policy with respect to combatting corporate corruption (acts of corruption committed on behalf of the company or in its interests)?**   ⃝ Yes ⃝ No  **If “Yes”,** ensure that your set of tender documents is enclosed with the respective document (certified by the authorized individual or management body) or provide a link to its online publication (http:// ). |
| 1. **Does your organization have a comprehensive program for combatting corporate corruption (anticorruption‑compliance system/program)[[4]](#footnote-4)?**   ⃝ Yes ⃝ Yes, it’s being rolled out  ⃝ No, but rollout planned ⃝ No, rollout not planned |
| 1. **Does your organization have a policy or other document governing the handling of conflicts of interest?**   ⃝ Yes ⃝ Yes, it’s being rolled out  ⃝ No, but rollout planned ⃝ No, rollout not planned |
| 1. **Does your organization have a dedicated hotline (phone number, email address or other communications channel) that can be used by employees, suppliers and/or others to report instances of corruption?**   ⃝ Yes ⃝ Yes, it’s being rolled out  ⃝ No, but rollout planned ⃝ No, rollout not planned  **If “Yes”,** provide details of the dedicated hotline for reporting corruption:  **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |
| 1. **Have any of your organization’s employees been appointed responsible for ensuring compliance with the requirements of anticorruption legislation?**   ⃝ Yes ⃝ No  **If “Yes”,** specify:   |  | | --- | | Position: | | Contact info: | |  | |
| 1. **Has your organization, or any of its employees, executives and/or founders, been administratively/criminally prosecuted for (suspected) violation of the requirements of anticorruption legislation?**   (any information known to your organization for the past 5 (five) years, as confirmed by the respective law-enforcement acts, including the official statements of such agencies’ representatives, as well as information that has not been the subject of review by such agencies or is currently under review thereby).  ⃝ Yes (guilt proven) ⃝ Yes (but guilt not proven)  ⃝ Yes (case still open) ⃝ No  **If “Yes”,** briefly describe the nature of the violation/charge, including references to the corresponding information in open sources, enclosed with any related documentation and/or specifying any other details that you believe would be helpful in reaching an objective valuation of such information:   |  | | --- | |  | |  | |  | |  | |
| 1. **Are any of your organization’s executives, management-body members or participants[[5]](#footnote-5) a Public Official?[[6]](#footnote-6)**   ⃝ Yes ⃝ No |
| 1. **Does your organization belong to a holding or corporate group?**   ⃝ Yes ⃝ No  **If “Yes”,** specify to which:   |  | | --- | |  | |  | |  | |
| 1. **Does the state have direct or indirect (through other individuals/legal entities – “Public Official,” or “State Bodies, Institutions or Enterprises”[[7]](#footnote-7)) participation in your organization (company) or the ability to control/influence decision-making at your organization?**   ⃝ Yes ⃝ No  **If “Yes”,** briefly describe the degree of influence, participatory share, names of such organizations, etc:   |  | | --- | |  | |  | | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | |  | |
| 1. **Within the scope of performing its obligations to MTS PJSC, will your organization be directly interacting with any Public Official?**   (for instance, for the purposes of obtaining permits, licenses, authorizations; formalizing titles/rights; winning contracts; facilitating decision-making or the achievement of understandings, etc.)  ⃝ Yes ⃝ No  **If “Yes”,** provide a justification for the necessity (where not made explicit by the agreement planned for conclusion with MTS PJSC) and essence of such interaction:   |  | | --- | |  | |  | |  | |  | |
| 1. **Does your organization use special tax treatment?**   ⃝ Yes ⃝ No  **If “Yes”, specify the special tax treatment that your organization uses**  **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |
| 1. **Does your organization have outstanding obligations with respect to the submission of reporting/remittance of tax and other compulsory payments?**   ⃝ Yes ⃝ No |
| 1. **Within the scope of performing its obligations to MTS PJSC, is your organization planning to engage subcontractors, intermediaries, third-party resources or act as a third-party agent?**   ⃝ Yes, subcontractors ⃝ No  ⃝ Yes, intermediaries  ⃝ Yes, third-party resources  ⃝ Yes, the organization is planning to act as a third-party agent   * 1. **If “Yes”:**   **I. Specify the third-party resources that your organization intends to use within the scope of performing its obligations to MTS PJSC:**   1. Physical resources ⃝ Yes ⃝ No 2. Intellectual resources ⃝ Yes ⃝ No 3. Technical and technological resources ⃝ Yes ⃝ No 4. Labor resources ⃝ Yes ⃝ No 5. Production facilities ⃝ Yes ⃝ No   Describe the works/services to be performed by the intermediary/subcontractor:  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  **II.** **In performing its assigned work will the subcontractor/intermediary be directly interacting with any Public Official (for instance, for the purposes of obtaining permits, licenses, authorizations, formalizing titles/rights, etc.)?**  ⃝ Yes ⃝ No   * 1. **If “Yes” and the subcontractor/intermediary is already known:**   **Is the subcontractor/intermediary in question directly or indirectly (through other individuals/legal entities) affiliated with any Public Official (inter alia, was founded by, is fully or partially owned by, or was recommended by said official)?**  ⃝ Yes ⃝ No |

Additional information (where applicable):

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| --- |
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**Certificate of Compliance with MTS PJSC Requirements**

**pertaining to business ethics and compliance with anticorruption legislation**

**I, (**full name, position**), acting on the basis of (**Charter/Power of Attorney**), as the authorized representative of (**name of the organization**), an (existing/potential – underline which applies) contractor of MTS PJSC, hereinafter referred to as the “Contractor”, have been made aware that:**

MTS PJSC adheres to the principles of legality, transparency and social responsibility in the furtherance of maintaining its good business reputation in front of the state, shareholders, clients, partners, competitors and society as a whole.

In order for these principles to be implemented, MTS PJSC takes actions aimed at strengthening healthy business relations in its dealings with contractors.

In relations with its suppliers, representatives and other counterparties, MTS PJSC takes active measures aimed at preventing any manifestations of restrictive or unfair competition, unscrupulous transacting, conflicts of interest and corruption, both on behalf of and as pertaining to MTS PJSC.

In this connection, MTS PJSC requires that its suppliers, representatives and other counterparties adhere unconditionally to the principles set forth in the MTS PJSC corporate documents listed below and be mutually supportive in fostering a culture of zero-tolerance towards any unlawful or unethical business conduct whatsoever, both when participating in procurement procedures organized by MTS PJSC as well as in subsequent business dealings with or on behalf of MTS PJSC.

I hereby affirm that the Contractor:

1. Is familiar with the content of the:

• MTS PJSC Policy on Compliance with Anticorruption Legislation

(posted online at: <https://moskva.mts.ru/upload/contents/537/Anti_Corruption_Laws_Compliance_Policy_rus.pdf>);

• MTS PJSC Code of Business Conduct and Corporate Ethics

(posted online at: <http://static.mts.ru/uploadmsk/contents/1655/Code_of_Business_Conduct_and_Ethics_illustrated.pdf>);

• Code of Business Conduct for MTS PJSC Suppliers

(posted online at: https://tenders.mts.ru/default.aspx);

The provisions of the aforementioned documents have been explained and are clearly understood;

2. Undertakes to adhere to the principles and requirements set forth in the documents specified in Clause 1 of this Certificate and applicable thereto as an MTS PJSC Contractor, and also undertakes to familiarize its representatives, agents, intermediaries, subcontractors and other entities engaged for the purposes of performing its obligations to MTS PJSC (hereinafter referred to as “Subcontractors”) with the documents specified in Clause 1 of this Certificate and ensure the compliance of its affiliates with MTS PJSC anticorruption requirements;

3. Consents, at the request of MTS PJSC, to the provision of written confirmation of its conformance with MTS PJSC requirements in the area of business ethics and compliance with anticorruption legislation;

4. Consents, at the request of MTS PJSC, to the inclusion of special anticorruption terms (an anticorruption clause) in the text of the agreement between the Contractor and MTS PJSC;

5. Consents, at the initiative and expense of MTS PJSC, to undergoing training on issues of compliance with the requirements of legislation and business ethics applicable to MTS PJSC;

6. Agrees to adhere to MTS PJSC policy in the area of gift-giving and to refrain from giving MTS PJSC employees gifts with a nominal value of over RUB 3,000;

7. Does not conduct its business in the interests of individuals holding state (municipal) service positions and burdened by a conflict of interest in the performance of their official (job) duties;

8. Undertakes to assist MTS PJSC in establishing the circumstances surrounding the conclusion of specific transactions and/or execution of specific operations, to provide the required clarifications, information and documents concerning contractual relations with MTS PJSC and/or pertaining to MTS PJSC goods, services and/or assets;

9. Undertakes, at the request of MTS PJSC but in any case no less frequently than once every two years (throughout the effective term of the respective agreement), to provide updates to the information, undertakings and warranties requested in this Questionnaire;

10. Warrants that Subcontractors acting on its behalf and/or in its interests do not conduct their business with the aim of exerting unlawful influence on Public Officials or with the intent of committing commercial bribery and shall only be cleared for the performance of contractual obligations after passing the appropriate due diligence on the part of the Contractor.

**I hereby affirm that the information provided in this Questionnaire is complete and accurate to the best of my knowledge as of the date of its provision.**

**Should the information provided above cease being accurate, I undertake to promptly notify MTS PJSC to that effect.**

“\_\_\_\_” \_\_\_\_\_\_\_\_\_\_\_\_ 201\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*(address at time of completion)*

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*(signature, seal) (full name, position)*

**QUESTIONNAIRE**

**FOR PARTICIPANTS/CONTRACTORS**

**Form-3**

MTS pays a great deal of attention to advancing the social sphere, which represents the foundation of the Company’s strategy and forms a critical area of business operations for the entire MTS Group. From our partners we expect reciprocal compliance with applicable legislation and transparent business practices.

|  |  |  |  |
| --- | --- | --- | --- |
| **General questions**   1. **Does your organization have an employee or division responsible for coordinating activities in the area of Corporate Social Responsibility (CSR) and philanthropy?**   ⃝ Yes ⃝ No  **If “No”, proceed to answering questions 5−8**     1. **Does your organization publish nonfinancial reporting (for instance, a CSR report, sustainable-development report, etc.)?**   ⃝ No such reports are compiled  ⃝ A basic CSR report is compiled  ⃝ A report is compiled based on GRI or other reporting-standard recommendations, specify which\_  ⃝ Nonfinancial information is disclosed as part of the integrated annual report  ⃝ I am unaware of any such reports   1. **Does your organization have documents governing CSR activities (policies, strategies, internal regulations, etc.)?**   ⃝ No  ⃝ They’re in development  ⃝ It has a CSR policy  ⃝ It has a CSR strategy  ⃝ It has a number of documents pertaining to CSR and philanthropic issues  ⃝ It has a CSR Committee  ⃝ I’m unsure whether such documents exist   1. **Does your organization pursue one or more of the international or industry-wide initiatives, principles, norms and/or concepts listed below?**   ⃝ GRI\*  ⃝ UN Global Compact\*  ⃝ Industry-wide rules and norms (specify which)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  ⃝ Other (specify)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  ⃝ No  ⃝ I’m unsure  \***Corporate Social Responsibility** – voluntarily-adopted obligations whereby the organization takes the interests of various stakeholder groups (organization employees, investors, shareholders, service consumers, suppliers, professional communities, etc.) into consideration when planning its operations. CSR initiatives fall beyond the scope of simple compliance with applicable legislation and envision the organization’s voluntary performance of additional measures aimed at responsible and ethical business conduct, improving the quality of life of its employees and their families, local communities in regions where the organization has a market presence and society as a whole.  **Nonfinancial (Sustainability) Report** – public document in which the organization discloses information on the results of its activities in the area of social, economic and environmental advancement and provides a description of its socially-significant initiatives, projects and measures aimed at improving the quality of life of its employees and their families, local communities in regions where the organization has a market presence and society as a whole. The Nonfinancial (Sustainability) Report is published on the organization’s official website and/or issued in printed form. The Report may be a standalone document or form part of the organization’s integrated annual report.  Examples of international or industry-wide initiatives, principles, norms, concepts:  **GRI (The Global Reporting Initiative**) – international standard governing the process of preparing nonfinancial (sustainability) reporting, containing a list of indicators in terms of the organization’s social, economic and environmental activities (https://www.globalreporting.org)  **United Nations Global Compact (UN GC)** – the United Nations’ most sweeping initiative in the area of Corporate Social Responsibility and sustainable development, whose mission is to encourage the mobilization of a global movement of sustainable companies. The UN Global Compact declares ten principles in the area of human rights, labor relations, environmental protection and combatting corruption.  **Occupational health and safety**   1. **Does your organization observe the human rights enshrined in the UN General Assembly Universal Declaration of Human Rights, including human rights in the workplace, the rejection of unlawful child labor, etc.?**   ⃝ Yes ⃝ No   1. **Was your organization fined/sanctioned over the past year for the violation of labor legislation?**   ⃝ Yes ⃝ No    **Environmental protection**   1. **Have any of your organization’s employees been appointed responsible for compliance with the requirements of environmental-protection legislation?**   ⃝ Yes ⃝ No   1. **Was your organization fined/sanctioned over the past year for the violation of environmental legislation?**   ⃝ Yes ⃝ No  **If “Yes**,**”** please specify which:   |  | | --- | |  | |  | |  | |
|  |

1. Documents confirming the lawful possession of claimed resources include, without limitation: copies of agreements with subcontractors/providers/lessors; copies of licenses, certificates, attestations, diplomas and other documents confirming the qualifications of claimed specialists; copies of extracts from the Unfied State Register of Righs to Immovable Property and Transactions Therewith confirming property title; copies of tax statements; copies of staff schedules, etc. [↑](#footnote-ref-1)
2. As defined in Art. 10 of RF Federal Law No. 273-FZ dated 25.12.2008 “On Combatting Corruption”. [↑](#footnote-ref-2)
3. Russian anticorruption legislation, The U.S. Foreign Corrupt Practices Act of 1977, The U.K. Bribery Act of 2010, and similar legislation of the countries in which the Company conducts its business. [↑](#footnote-ref-3)
4. Inter alia, as envisioned by Art. 13.3 of RF Federal Law No. 273-FZ dated 25 December 2008 “On Combatting Corruption”. [↑](#footnote-ref-4)
5. Company participants/participation(for the purposes of the completion of this Questionnaire) – founders, owners, shareholders, ultimate beneficiaries of your organization. [↑](#footnote-ref-5)
6. Public Official (for the purposes of the completion of this Questionnaire) – federal bureaucrats and Career Civil Servants of RF Consitituent Entities, as well as any Russian or foreign appointee or elected official occupying any position in a legislative, executive, administrative or judicial body or international organization; any person carrying out any public function for the state, inter alia, for State Bodies, Institutions or Enterprises;\* leading political figures, officials of political parties, including candidates for political posts, influential functionaries in nationalized industries or natural monopolies; heads and employees of State Bodies, Institutions or Enterprises, including physicians, military servicemembers, municipal officials, etc.; individuals known to have a connection to a Public Official by virtue of family ties, friendship and/or business relations. [↑](#footnote-ref-6)
7. State Bodies, Institutions or Enterprises (for the purposes of the completion of this Questionnaire) – bodies of state power and local self-government (including state ministries, services, agencies), state departments and their structural divisions, political parties and all legal entities controlled directly or indirectly by the state [↑](#footnote-ref-7)