



Anti-corruption policy of S 7 ENGINEERING, LLC

S7MCS1-OM100

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PURPOSE OF THE POLICY – protection of S 7 ENGINEERING, LLC (hereinafter referred to as the Company) from corruption offenses and related negative consequences.

OBJECTIVE OF THE POLICY – prevention, elimination and suppression of corruption offenses committed both by the Company's employees against third parties and by third parties against the Company.

MAIN TASK – building a common understanding of the rejection of corruption in all its forms among the Company's employees and counterparties.

1. Basic principles of anti-corruption legislation.

- 1.1. Bribery, giving bribes to a private individual or public official, promising bribes and/or any financial or other benefit, including through intermediaries, in order to induce a person to perform his or her official duties improperly is prohibited.
- 1.2. Accepting bribes or agreeing to receive bribes for proper or improper performance of official duties is prohibited.
- 1.3. Intermediation in bribery, namely transfer of a bribe from one person to another person, is prohibited.
- 1.4. Connivance of bribery, namely a lack of measures for prevention, elimination and suppression of corruption offences in the company, is prohibited.
- 1.5. The commission of corruption offenses shall be inevitably punishable.

2. Zero tolerance for corruption.

- 2.1. The Company adheres to the principle of zero tolerance for any manifestations of corruption.
- 2.2. The Company openly declares zero tolerance for corruption and encourage its Counterparties to observe principles of anti-corruption legislation and this policy.

3. Mission of the top management.

- 3.1. To demonstrate irreconcilability to any form of corruption, setting an example with their own behavior to the Company's employees.
- 3.2. To carry out preventive measures to eliminate corruption cases.

4. Obligations of the Company's employees.

- 4.1. The Company's employees
 - a) must comply with the anti-corruption legislation and this Policy;
 - b) shall not commit corruption offenses;
 - c) understand that committing corruption offenses indirectly or through third parties is an unlawful act as well as direct and independent actions;
 - d) shall not to condone bribery or any other manifestations of corruption.
- 4.2. In addition to the above, leaders at all levels shall ensure that Company's employees are familiar with this Policy.



5. Reports of offenses.

5.1. Company's employees shall inform senior management upon:

- a) receipt of a proposal from counterparties and third parties on committing corrupt acts directly related to activities of the Company or its employees;
- b) receipt of threats from counterparties and third parties in the event that the Company's employee refuses to commit corrupt acts directly related to activities of the Company or its employees;
- c) detection of corrupt acts committed by the Company's employees or directed towards the Company;
- d) detection that existing measures to prevent and combat corruption adopted by the Company have proven to be insufficiently effective;
- e) suspicions of reliability of Company's employees and counterparties.

5.2. Voluntary reporting is allowed to be used to inform about corruption cases.

6. Inevitability of punishment.

6.1. The Company's employees understand the inevitability of punishment for committing corruption offenses, condoning corruption and concealing corruption offenses that have become known.

7. Principles of non-punishment.

7.1. The Company's employees are informed about the guarantee that no penalties or other sanctions will be imposed on a reporter for sending voluntary reports, unless the reporter himself/herself committed corruption offenses.

7.2. No penalties can be imposed on the Company's employees if they refuse to participate in corruption offenses, including if the refusal results in losses or lost profits for the Company.

8. Availability of information.

8.1. This Policy is freely available on the Company's website <https://www.s7technics.ru/> and all of the Company's employees must familiarize themselves with it.

9. Corruption prevention.

In order to prevent corruption, the Company:

- 9.1. Raises the level of anti-corruption culture.
- 9.2. Constantly controls procurement activities and purchase cost of aviation parts through independent structural units.
- 9.3. Organizes anti-corruption training for employees who hold positions potentially associated with a corruption component in agreement with the Economic Security Department.
- 9.4. Includes an anti-corruption clause in contracts with counterparties.
- 9.5. Welcomes voluntary reports (including anonymous reports) aimed at preventing corruption acts of employees and counterparties.

10. Interaction with counterparties.

The Company adheres to the following principles when selecting and working with counterparties:



- 10.1. The Company strives to cooperate with counterparties that are guided by the principles of legality and ethical behavior and prove the quality of services provided with relevant documents and certificates.
- 10.2. The Company welcomes counterparties' anti-corruption policies and their actions to prevent corruption in their activities.
- 10.3. Two or more Company's employees are present at meetings with counterparties.
- 10.4. Before initial meetings with new counterparties the Company's employees inform:
 - a) about the Company's intolerance to corruption;
 - b) about the inevitability of punishment for corrupt acts;
 - c) that the counterparty is able to report on any unlawful actions of the Company's employees that became known to the relevant services of the Company.
- 10.5. When interacting with counterparties via e-mail the Company's employees shall put the Alias (mailing lists) in copy to which two or more Company's employees are connected.

11. Risk assessment and minimization.

- 11.1. The Company understands and accepts the risk of corruption, assesses it and takes it into account in processes' risk registers.
- 11.2. The Company regularly reviews risk registers, reassesses already recorded risks and adds new ones.
- 11.3. When new corruption risks are identified, the Company assesses them and develops control and minimization measures. Newly identified corruption risks are immediately entered into the risk registers.

12. Monitoring the efficiency of procedures.

- 12.1. The Company analyzes the effectiveness of anti-corruption measures (including on the basis of employees' appeals) and improve them on an ongoing basis.

CEO



Igor Scherbakov