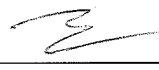


APPROVED
by the Order of
the Managing Director of
“TerraLink” GC
No. 0309/19
Dated September “03”, 2019


_____/ Lewin Ronald
L.S.

ANNEX 1
to the Regulation on Anti-Corruption Policy
“TerraLink” LLC

**PROCEDURE FOR FILING AND CONSIDERATION OF APPLICATIONS
FOR COMMITTING CORRUPTION OFFENSES**

“TerraLink” Group of Companies complies with high ethical standards in business relations, and also seeks to improve its corporate culture and strengthen its business reputation.

This Procedure for Filing and Consideration of Applications on Violation of the Anti-Corruption Policy (hereinafter referred to as the “Procedure”) has been developed for the purpose of implementing a uniform, unprejudiced, fair and consistent in accordance with the legislation of the Russian Federation and other countries that have adopted anti-corruption laws, form of acceptance, consideration and settlement of applications from management, employees and other persons who may act on behalf of the Companies belonging to “TerraLink” Group of Companies (hereinafter referred to as the “TerraLink” GC” or the “Company belonging to “TerraLink” GC”), as well as from the management, employees and other interested persons of the counterparties of the Companies belonging to “TerraLink” GC (hereinafter referred to as the “applicant” or “applicants”) related to the detection or implementation of actions that may violate the anti-corruption laws of the Russian Federation, as well as internal regulations, orders, instructions and other normative acts adopted either in the Companies belonging to “TerraLink” GC or in the counterparties of the Companies belonging to “TerraLink” GC.

1. All employees of “TerraLink” GC shall be obliged to comply with the regulations of the Russian anti-corruption legislation established by, inter alia, the Federal Law “On Fight Against Corruption”, the Criminal Code of the Russian Federation, the Code of the Russian Federation on Administrative Violations and other regulatory acts, the main requirements of which are prohibition of giving and taking bribes, prohibition of commercial bribery and prohibition of mediation in bribery.

2. The Employees of “TerraLink” GC in the course of their activities shall:

- abstain from committing and (or) participating in corruption offenses in the interests of or on behalf of the Companies belonging to “TerraLink” GC;
- abstain from behavior that may be interpreted by others as a willingness to commit or participate in a corruption offense in the interests or on behalf of the Companies belonging to “TerraLink” GC;
- immediately inform the specialist responsible for complying with the provisions on the anti-corruption policy of the Companies belonging to “TerraLink” GC, or send an appeal to the anonymous mail anonymous@terralink.ru on the occurrence of any of the following:
 - cases of the employee being persuaded to commit corruption offenses;
 - the employee is aware of information on cases of the corruption offenses committed by other employees, counterparties of the Companies belonging to “TerraLink” GC or other persons;
 - conflict of interest.

Provision of information shall be carried out in the manner prescribed by the Anti-Corruption Policy and this Procedure for Consideration of Applications.

3. Guarantees for employees:

- 3.1. "TerraLink" GC shall forbid the prosecution of those who report about violations with good intentions.
- 3.2. "TerraLink" GC shall guarantee an unprejudiced and comprehensive review and verification of any information received about a violation in accordance with the law and internal policies and procedures.

All applications on violations received shall be submitted to the Compliance Committee of "TerraLink" GC (hereinafter referred to as the "Compliance Committee") and considered only by responsible members of the Compliance Committee.

3.3. "TerraLink" GC shall guarantee non-disclosure of the fact that the applicant has provided information about the violation, except when such disclosure is required in accordance with the law whereof the applicant shall be preliminary informed.

4. Information about the violation shall be provided by the applicant individually or jointly with other applicants using the following methods of reporting:

- by way of sending messages from the website and portal of "TerraLink" GC;
- by email address anonymous@terralink.ru;
- in any other form that allows to record the content of information about the violation.

5. The list of information to be reflected in application:

- if the applicant is an individual: last name, given name, patronymic, postal address to which reply or redirect notice shall be sent; date, personal signature (if the application is submitted in writing in hard copy), telephone for feedback (if desired, the message can be submitted anonymously);
- if the applicant is a legal entity: name, code in the Unified State Register of Legal Entities, postal address to which reply or redirect notice shall be sent, full name authorized person, telephone for feedback;
- description of the circumstances in which it became known about cases of corruption offenses (date, place, time, other conditions);
- details of the corruption offense;
- all known information about an individual (legal entity) that persuade to get involved into corruption offenses;
- the method and circumstances of induction of a corruption offense, as well as information about the refusal (consent) to accept the person's proposal to commit a corruption offense;
- signature of the applicant (optional), date.

If necessary, in support of their arguments, the applicant shall attach documents and materials or their copies to the written application, and scanned copies if sent by electronic communication.

If the written application does not contain information about the applicant who sent the application, no response shall be given to such application.

6. Applications shall be subject to mandatory registration in a special journal, which is stitched and numbered, and also certified by the Head of the Compliance Committee of "TerraLink" GC.

7. The date of receipt of the application shall be:

- the date of registration of oral statement of the applicant in the journal of registration and record of appeals;
- the date of receipt of the written application by the person responsible for receiving correspondence;
- the date of receipt of the application by email.

8. The date of completion of consideration of the application shall be regarded to be one of the following

actions:

- sending a reply to the applicant;
- written refusal of the applicant of the arguments set forth in his application;
- signing a reasoned opinion (response) on the application by the Head of the Compliance Committee of “TerraLink” GC.

9. The journal in “TerraLink” GC shall be kept by the Head of the Compliance Committee of “TerraLink” GC. Refusal to register an application shall not be allowed.

10. Verification of information contained in the application shall be carried out within 30 (thirty) business days from the date of registration of the application.

11. In order to organize the inspection, the Head of the Compliance Committee shall within 3 (three) business days convene a meeting of the Compliance Committee to verify the corruption offense specified in the application. The list of members of the Compliance Committee shall be approved by order of the Managing Director of “TerraLink” GC.

12. The procedure for verification of information contained in the application:

The Compliance Committee of “TerraLink” GC shall:

12.1. notify the applicant of the acceptance of the application for consideration by electronic communication or by other means.

12.2. take an assessment of facts stated in the application, carry out the analysis of documents, if any.

12.3. request clarifying information and additional materials from the applicant, if necessary.

12.4. interact with other structural subdivisions of the Companies belonging to “TerraLink” GC:

- send appropriate requests for materials related to the subject matter;
- request oral and written explanations from employees in connection with the actions of which the application was received from the applicant, and other information necessary for an objective, comprehensive and timely consideration of the application;
- bring specialists, as agreed upon with their direct supervisors, to provide opinions within their competence;
- conduct other necessary activities.

12.5. To consider the application, the Compliance Committee shall hold a meeting with the participation of employees of structural subdivisions of the Companies belonging to “TerraLink” GC. The decision to hold the meeting shall be made by the Head of the Compliance Committee.

12.6. Based on the results of consideration of the application, a reasoned opinion (response) shall be drawn up, which is approved by members of the Compliance Committee, signed by the Head of the Compliance Committee and submitted to the General Director of the Company belonging to “TerraLink” GC, with respect to the employee or other contractors or their representatives which submitted the application and the Managing Director of “TerraLink” GC.

If the application is filed in relation to the Head of the Company, it shall be submitted for consideration only to the Managing Director of “TerraLink” GC.

13. If the decision is made on a dismissal of an application without prejudice, then a notification letter shall be sent to the applicant of a dismissal of an application without prejudice with justification of the reasons.

14. Based on the results of the inspection, the Compliance Committee shall provide the Managing Director of “TerraLink” GC with an opinion on assurance or refutation of the fact that gave rise to preparation of the application.

15. If there is an evidence of violation of the anti-corruption policy by an Employee or counterparty of the Company, belonging to “TerraLink” GC, the Managing Director of “TerraLink” GC together with the General Director of such Company, either make a decision to bring employee/employees of the company who violate the anti-corruption policy to a disciplinary, administrative, civil or criminal responsibility, or

send information to law enforcement agencies.

16. Any employee, in case of doubt about the legitimacy of their actions, as well as actions, inaction or offers of other employees, contractors or other persons who interact with the Companies belonging to "TerraLink" GC, in accordance with the principles and requirements of the anti-corruption policy, shall inform on the matter their direct supervisor and/or authorized person responsible for compliance with the anti-corruption policy, who will provide recommendations and clarifications regarding the existing situation, if necessary.

17. Supervision for the consideration of applications.

The Head of the Compliance Committee shall carry out the direct supervision of compliance with this Procedure.