

APPROVED
by Decision of the Board of Directors
of PJSC “Aeroflot”
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THE AEROFLOT GROUP ANTI-CORRUPTION POLICY

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01. General Provisions

The anti-corruption policy of the Aeroflot Group (hereinafter referred to as the “Anti-Corruption Policy”) is a fundamental document of the Aeroflot Group in the field of combating corruption, which contains a set of interrelated principles and procedures provided for in Article 13.3 of the Federal Law No.273-FZ dated December 25, 2008 “On Combating Corruption in the Russian Federation” and specific activities envisaged by the official interpretation act - Methodological Recommendations on the Development and Adoption by Organizations of Measures to Prevent and Combat Corruption developed by the Ministry of Labour and Social Protection of the Russian Federation (as amended on April 16, 2014).

The Anti-Corruption Policy reflects the Aeroflot Group's commitment to the highest ethical standards of open and honest business with a view to improving corporate culture, following the best corporate governance practices and maintaining the Group's business reputation at the proper level.

This document is posted on the corporate websites of the Aeroflot Group's companies. The Aeroflot Group's companies explicitly state that dishonest and illegal ways of doing business are unacceptable and voluntarily assume additional obligations to prevent and preclude corruption recommended by international and Russian legislation.

02. Regulatory References

The requirements contained in the following regulations were taken into account in drawing up this Anti-Corruption Policy:

International legal standards:

The United Nation Convention against Corruption (adopted on October 31, 2003 by Resolution 58/4 at the 51st plenary meeting of the 58th session of the UN General Assembly and ratified by Federal Law No. 40-FZ dated March 8, 2006);

The Criminal Law Convention on Corruption of the Council of Europe (adopted on January 27, 1999 and ratified by the Russian Federation in 2006 (Federal Law No.125-FZ dated June 25, 2006);

The Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (adopted on November 21, 1997, acceded by the Russian Federation on February 1, 2012 (Federal Law No.3-FZ dated February 1, 2012).

Russian legislation:

The Constitution of the Russian Federation dated December 12, 1993;

The Criminal Code of the Russian Federation No. 63-FZ dated June 13, 1996;

The Code of Administrative Offences of the Russian Federation No. 195-FZ dated December 30, 2001;

Federal Law No.273-FZ dated December 25, 2008 “On Combating Corruption”;

The National Anti-Corruption Strategy approved by Decree of the President of the Russian Federation No.460 dated April 13, 2010;

The National Anti-Corruption Plan for 2014-2015 approved by Decree of the President of the Russian Federation No.266 dated April 11, 2014;

Decree of the President of the Russian Federation No.309 dated April 2, 2013 “On Measures to Implement Certain Provisions of the Federal Law “On Combating Corruption”;

Decree of the President of the Russian Federation No.613 dated July 8, 2013 “Anti-Corruption Matters”.

Methodological frameworks:

Methodological Recommendations on the Development and Adoption by Organizations of Measures to Prevent and Combat Corruption approved by the Ministry of

Labour and Social Protection of the Russian Federation, August 11, 2013 (as amended on April 16, 2014);

Anti-Corruption Rules of the ICC (the International Chamber of Commerce) (2011 edition).

Internal documents of the Aeroflot Group:

The Aeroflot Group Development Strategy through 2025 approved by the Board of Directors of PJSC “Aeroflot”;

Code of Corporate Ethics of JSC “Aeroflot”

Charters and internal documents of the Aeroflot Group’s companies.

03. Terms, Definitions and Abbreviations

Anti-Corruption Policy - a unified basic document containing a set of interrelated principles, procedures and specific activities aimed at combating corruption in the Aeroflot Group.

anti-corruption standard - a unified system of prohibitions, restrictions and permissions precluding corruption;

bribe – the giving/receiving of money, securities, other property by an official, foreign official or an official of a public international organization, in person or through an intermediary, or illegal rendering of property-related services to him/her or his/her affiliated persons, granting of other proprietary rights in exchange for actions (inaction) in favour of the bribe-giver or persons represented by him/her, if such actions (inaction) are within the powers of the official or if he/she can, by virtue of his/her official position, facilitate such actions (inaction), and equally for overall patronage or negligence in office;

the Aeroflot Group – PJSC “Aeroflot” and its controlled entities;

customer, procurement participant – a legal entity, regardless of its organizational legal form and form of ownership, or any individual, including an individual entrepreneur, being a party to a contract;

abuse of power – the use of powers by a person performing managerial functions in a commercial or other organization contrary to the legitimate interests of the organization for purposes of gaining benefits and advantages for him/herself or other persons or causing harm to other persons if this action has resulted in significant damage to the rights and legitimate interests of individuals or organizations or legally protected interests of companies or the state;

CAO RF – Code of Administrative Offences of the Russian Federation (No.195-FZ dated December 30, 2001);

commercial bribery – illegal transfer of money, securities or other property to a person performing managerial functions in a commercial or other organization or rendering of property-related services to him/her or his/her affiliated persons, granting of other proprietary rights in exchange for actions (inaction) related to the person’s official position in favour of the bribe-giver. Illegal receipt of money, securities, or other property or illegal use of property-related services or other proprietary rights by a person performing managerial functions in a commercial or other organization in exchange for actions (inaction) related to the person’s official position in favour of the bribe-giver;

counterparty - any Russian or foreign legal entity or individual with whom the organization enters into a contractual relationship other than an employment relationship;

conflict of interest – a situation where the personal interest (direct or indirect) of an organization’s employee affects or may affect the proper performance of his/her official

(job) duties and a conflict arises or may arise between his/her personal interest and the rights and legitimate interests of the organization, that may harm its legitimate interests;

corruption offence – an unlawful guilty act (action or inaction) containing elements of corruption, for which disciplinary, criminal or civil administrative liability is established by law;

corruption (in commercial organizations) – bribe-giving, abuse of power, commercial bribery or other illegal use by an individual of his/her official position contrary to the legitimate interests of the organization in order to obtain benefits in the form of money, valuables, other property or property-related services, other proprietary rights for him/herself or for third parties, or illegal provision of such benefits to that person by other individuals, and committing such actions on behalf or in the interests of a legal entity;

illegal gratification on behalf of a legal entity - illegal transfer, offer or promise, on behalf or in the interests of a legal entity, to an official, a person performing managerial functions in a commercial or other organization, a foreign official or an official of a public international organization, of money, securities, other property, rendering of property-related services to him/her or his/her affiliated persons, granting of other proprietary rights for having this official, person performing managerial function in a commercial or other organization, foreign official or official of a public international organization committing, in the interests of such legal entity, actions (inaction) related to his/her official position;

organization - a legal entity, regardless of its form of ownership, organizational legal form or industry in which it operates;

prevention of corruption – organization’s activities aimed at the introduction of elements of corporate culture, organizational structure, rules and procedures regulated by internal local acts to prevent corruption offences;

combating corruption – activities carried out by organizations within their authority:

a) to prevent corruption, including to identify and then to eliminate causes of corruption (prevention of corruption);

b) to detect, prevent, suppress, uncover and investigate corruption offences (fight with corruption);

c) to minimize and (or) eliminate consequences of corruption offences;

CC RF - Criminal Code of the Russian Federation (No. 63-FZ dated June 13, 1996);

04. Amendment and Revision System

The Anti-Corruption Policy shall be amended and supplemented in the following cases:

changes in international legislation, legislation of the Russian Federation and enactment by government authorities of the Russian Federation of regulations that significantly affect the rights and obligations of government authorities, legal entities and individuals and have a direct impact on activities of PJSC “Aeroflot” and its controlled entities in the field of combating corruption;

after significant events such as a merger, acquisition, liquidation of the Aeroflot Group companies.

All amendments and additions to the Anti-Corruption Policy of the Aeroflot Group shall be signed off by Deputy Directors General, heads of structural units whose activities are impacted by these amendments and additions, and the Head of QMS and shall be approved by the Board of Directors of PJSC “Aeroflot”.

Changes shall be made on existing pages and marked with a vertical bar. If an

additional number of pages is required, such added pages shall be marked with a small letter of the Russian alphabet in brackets, e.g. 20(a).

Control over the timely and accurate incorporation of amendments and additions and their distribution to holders of the Anti-Corruption Policy shall be exercised by the structural unit which initiated such changes to the Anti-Corruption Policy.

Each holder of the Anti-Corruption Policy shall ensure the safety and timely incorporation of amendments into his/her copy.

05. List of Holders of the Anti-Corruption Policy

No.	Registration number of the copy	Status	Owner of the copy (structural unit)	Person responsible for maintenance of the copy
1	01	reference	Director General of PJSC "Aeroflot"	G.V. Yakimov
2	02	work	First Deputy Director General for Aviation Security	V.N. Antonov
3	03	work	Deputy Director General for Finance and Network and Revenue Management	Sh.R. Kurmashov
4	04	work	Deputy Director General for Customer Service	V.Ya. Zingman
5	05	work	Deputy Director General for Information Technologies	K.I. Bogdanov
6	06	work	Deputy Director General for Strategy and Alliances	D. Callegari
7	07	work	Deputy Director General for Sales and Property Matters	N.B. Altukhov
8	08	work	Deputy Director General for Administration	V.N. Avilov
9	09	work	Deputy Director General - Director of Flight Operations	I.P. Chalik
10	010	work	Deputy Director General- Technical Director	I.V. Parakhin
11	011	work	Chief Accountant	I.A. Nikolaeva
12	012	work	Director of the Internal Audit Department	L.A. Dushatin
13	013	work	Director of the Economic Security Department	A.G. Noskov
14	014	work	Flight Safety Management Department	G.N. Matveev
15	015	work	Personnel Development Department	D.V. Karasev
16	016	work	Head of QMS	T.F. Turanskaya
17	017	work	Head of Restricted Activities and Special Communications	S.B. Levkin

1. Goal, measures, objectives and principles of the Anti-Corruption Policy

1.1. The Anti-Corruption Policy has been developed to establish a unified approach to the implementation of the requirements of Federal Law No. 273-FZ dated December 25, 2008 “On Combating Corruption” relating to the development and adoption of measures to prevent and combat corruption.

1.2. In accordance with Article 13.3 of Federal Law No. 273-FZ dated December 25, 2008 “On Combating Corruption”, the basic measures to prevent and combat corruption are as follows:

designating structural units responsible for the prevention of corruption and other offences;

- cooperating with law enforcement authorities in combating corruption;
- developing and implementing standards and procedures to ensure faithful work;
- adopting the Code of Ethics;
- preventing and resolving conflicts of interest;
- prevention of unofficial reporting and the use of forged documents.

1.3. Objectives of the Anti-Corruption Policy:

implement the requirements of Article 13.3 of Federal Law No.273-FZ dated December 25, 2008 “On Combating Corruption”;

- create an effective legal mechanism to combat corruption;
- improve the legal framework for combating corruption and collaborating with government authorities whose competence includes the issues of combating corruption;
- prevent corruption and other offences, ensure accountability for them;
- form a common understanding among the shareholders, counterparties, members of governing and control bodies, and employees of the Aeroflot Group's position regarding inadmissibility of corruption in all its forms and manifestations;
- minimize the risk of involvement in corrupt activities;
- establish corporate anti-corruption thinking.

1.4. Principles of the Anti-Corruption Policy:

compliance of the Anti-Corruption Policy with the current legislation and generally accepted standards;

zero tolerance of corruption in all its forms and manifestations, including in relationships with counterparties, representatives of government authorities, political parties, employees of the Aeroflot Group companies, and other persons;

personal example of management in fostering a culture of intolerance of corruption and creating an internal system for preventing and combating corruption;

involvement of employees: awareness of the provisions of anti-corruption laws among the employees and their active participation in establishing and implementing the anti-corruption standards and procedures declared in this Anti-Corruption Policy;

effectiveness of anti-corruption procedures: carrying out anti-corruption measures that can ease the implementation process and produce a significant result;

accountability and certainty of punishment: the inevitability of punishment for those employees, regardless of their position, length of service and other conditions, who have committed corruption offences pertaining to their job duties, and personal responsibility of management for the implementation of the Anti-Corruption Policy;

openness of doing business: informing counterparties, partners and the public about the anti-corruption standards of business conduct adopted by the Aeroflot Group;

continuous control and regular monitoring of the effectiveness of implemented anti-corruption standards and procedures and control over their execution.

2. Scope of application and persons subject to the Anti-Corruption Policy

The Anti-Corruption Policy applies to all employees of The Aeroflot Group companies incorporated in and under the laws of the Russian Federation, whose governing bodies have approved the Anti-Corruption Policy, regardless of their positions and functions.

3. Bodies and officials responsible for combating corruption and corruption offences

The following bodies and officials are responsible for combating corruption and corruption offences in the Aeroflot Group companies:

The Board of Directors, the Executive Board (if any), the Director General, a structural unit of the Aeroflot Group.

3.1. The Board of Directors:

- identifies key strategic areas of the Anti-Corruption Policy;
- approves the Anti-Corruption Policy;
- approves amendments and additions to the Anti-Corruption Policy;
- controls the overall results of the implementation and application of the Anti-Corruption Policy.

3.2. The Director General:

- approves the company's internal documents aimed at the implementation of the principles and requirements of the Anti-Corruption Policy;
- appoints structural units responsible for combating corruption, including the development, implementation and monitoring of anti-corruption procedures;
- allocates functions and activities aimed at combating corruption in the company in accordance with the competence and objectives of structural units.

3.3. The structural unit responsible for legal support to the entity's activities:

- monitors current Russian legislation, applicable foreign legislation and international anti-corruption legislation, including in the field of combating corruption, and tracks amendments thereto;
- conducts a legal evaluation of the situation in the event that a conflict of interest has arisen or may arise;
- provides methodological assistance in the implementation of anti-corruption activities, promotes legal awareness amongst employees;
- participates in the preparation of materials on corruption offences for submission to law enforcement authorities;

3.4. The structural unit responsible for HR management:

- organizes anti-corruption training sessions recommended by structural units responsible for combating corruption, provides individual consultations to employees;
- organizes work to conclude additional agreements with officials of The Aeroflot Group companies establishing a duty to comply with the requirements of applicable anti-corruption legislation in accordance with the approved forms.

3.5. The structural unit responsible for document management and control over the execution of decisions made by executive bodies of the legal entity:

- arranges for the timely receipt, initial review and registration of notifications received from employees about attempts to induce them to commit corruption offences and presents them for reporting to Directors General and Deputy Directors General of the Aeroflot Group's companies;

ensures that work is carried out to provide information and handle inquiries related to documents developed for the purposes of implementation of the Anti-Corruption Policy.

3.6. The structural unit responsible for internal audit:

conducts audits to verify compliance with statutory provisions and provisions of internal documents related to combating corruption by members of the executive bodies and employees of PJSC “Aeroflot” and its controlled entities;

performs an independent and objective evaluation of the effectiveness of the risk management and internal control processes in the field of preventing and combating corruption, develops recommendations for enhancing their reliability and effectiveness and presents the evaluation results to the Board of Directors (the Audit Committee of the Board of Directors) and the executive bodies of the Aeroflot Group’s companies;

considers reports on instances of corruption received via the Hotline - the Board of Directors (Audit Committee of the Board of Directors) confidential whistle blowing system.

3.7. The structural unit responsible for economic security:

accumulates, summarizes and analyses information on anti-corruption activities of structural units of the Aeroflot Group’s companies and coordinates these activities;

checks the information contained in employee notifications about attempts to induce them to commit corruption offences;

ensures interaction with law enforcement and other government authorities on matters related to the organization of anti-corruption activities in the Aeroflot Group’s companies.

4. Employees’ obligations to prevent and combat corruption

Employees of the Aeroflot Group are subject, in particular, to the following obligations:

to refrain from committing and/or being involved in corruption or other offences committed in the interests or on behalf of the Aeroflot Group;

to refrain from behaviour which could be interpreted by others as willingness to commit or participate in corruption or other offences committed in the interests or on behalf of the Aeroflot Group;

to immediately report any attempts to induce them to commit corruption offences to the structural unit or officer responsible for combating corruption;

to notify the structural unit or officer responsible for combating corruption when the individual employee has or may have a conflict of interest.

5. Anti-corruption activities, standards and procedures

5.1 Assessment of corruption risks

5.1.1. Corruption risks are assessed to determine specific business processes and transactions within the Aeroflot Group that are associated with a high likelihood of corruption offences being committed by employees for personal benefit or to gain benefits for companies and organizations.

5.1.2. Corruption risks are assessed both at the stage of development of the Anti-Corruption Policy and on a regular basis following its approval.

5.1.3. The following procedure for assessing corruption risks has been established:

presenting activities of the Aeroflot Group’s companies as separate business processes;

identifying “critical points” and positions: elements (sub-processes) which are most vulnerable to corruption and other offences are identified for each business process;

describing possible corruption offences: characterizing benefits or advantages that can be gained through the commission of a corruption offence, likely forms of corrupt payments;

preparing corruption risk maps of the Aeroflot Group’s companies;

compiling a list of positions with a high risk of corruption;
establishing special anti-corruption procedures and requirements, including completing a conflict of interest declaration on a regular basis;
developing a set of measures to eliminate or minimize corruption risks.

5.2. Identifying and resolving conflicts of interest

The Aeroflot Group's companies take measures to identify and resolve conflicts of interest in order to limit the influence of private interests and the personal interest of employees on job functions they fulfil and business decisions they make:

5.2.1. Develop and adopt internal documents establishing the procedure for notifying the employer of a personal interest which leads or may lead to a conflict of interest.

5.2.2. Bring to the attention of employees who have a duty to notify the employer of the appearance of a personal interest which leads or may lead to a conflict of interest their obligation to comply with the requirements contained in internal documents.

5.2.3. Are guided by the following principles in carrying out their work to manage conflicts of interest:

a duty to disclose any actual or potential conflict of interest;
considering and assessing reputational risks on an individual basis when identifying and resolving each conflict of interest;

confidentiality of the conflict of interest disclosure and resolution process;
maintaining a proper balance between the interests of the employer and the employee in resolving conflicts of interest;

protecting employees from retaliation for reporting a conflict of interest.

5.2.4. Establish the following obligations for the Aeroflot Group's employees:
to be guided by the interests of the company in making decisions on business matters and performing their job duties;

to avoid situations and circumstances that may give rise to a conflict of interest;

to disclose any actual or potential conflict of interest;

to facilitate the resolution of an actual conflict of interest.

5.2.5. Designate persons responsible for receiving information about conflicts of interest.

5.2.6. Prohibit entering into contracts with persons found to have a conflict of interest or otherwise to have committed abuses.

5.2.7. In implementing the Anti-Corruption Policy, preference is given to efforts to prevent situations where a conflict of interest may arise.

5.2.8. In order to prevent conflicts of interest, employees shall:
not undertake any actions motivated by personal property or other interests that prevent them from performing their official duties in good faith;
comply with the standards of professional ethics and business conduct.

5.3. Development and implementation of standards and procedures to ensure faithful work

The Aeroflot Group's companies ensure that anti-corruption standards of conduct of employees are incorporated into their corporate culture and therefore:

5.3.1. Develop and adopt the Code of Corporate Ethics, which defines:
common values and principles of the Aeroflot Group's companies;

specific rules and standards of employee conduct concerning ethics of business relationships is general, which are aimed at fostering ethical, bona fide behaviour of employees.

5.3.2. Are guided by the principles of honesty and objectivity in staffing.

5.3.3. Prohibit the acceptance of any gifts or personal favours in the form of money, invitations to a restaurant, tickets for entertainment or sports events, paid vacation, etc. by employees related to their official duties, except for the exchange of promotional souvenirs generally accepted in business relationships and business meetings in restaurants and cafés with each party paying its own expenses, and tickets for events provided under a sponsorship contract in which PJSC “Aeroflot” and its controlled entities acts as a sponsor.

5.4. Consulting and training employees

The Aeroflot Group’s companies organize:

employees' training on combating corruption;

programs to further legal awareness among employees as well as individual consultations for employees on matters related to preventing and combating corruption and applying (complying with) anti-corruption standards and procedures adopted in the Aeroflot Group.

5.5. Internal control and risk management. Monitoring internal control and risk management in the field of preventing and combating corruption

5.5.1. The risk management and internal control process in the field of preventing and combating corruption follows the following steps:

identifying and assessing corruption risks, areas (business processes) and transactions exposed to corruption risks;

evaluating the efficiency of existing activities to prevent and combat corruption;

developing new and improving existing activities to prevent and combat corruption in the areas (processes) and transactions exposed to corruption risks;

making a list of positions with high corruption risks;

as regards employees whose official duties have inherent risks of corruption, measures must be taken for the proper management of potential conflicts of interest that they may face.

5.5.2. The approach to identifying and assessing corruption risks must be such as to ensure that corruption risks are fully identified in a timely manner and are measured precisely.

5.5.3. In detecting and assessing risks of corruption, it is necessary to identify areas/business processes and transactions within the Aeroflot Group that are associated with a high likelihood of corruption offences being committed by company employees.

5.5.4. In order to maintain an efficient risk management and internal control process in the field of preventing and combating corruption, periodic assessment of its effectiveness is carried out.

5.5.5. Periodic assessment of the effectiveness of the risk management and internal control process in the field of preventing and combating corruption is carried out as part of audits performed by the internal audit unit and external independent evaluations of the risk management and internal control process in the field of preventing and combating corruption.

5.5.6. If anti-corruption activities are found to be ineffective, new anti-corruption activities are developed or existing ones are improved.

5.6. Taking anti-corruption measures in cooperation with counterparty organizations

5.6.1. The Aeroflot Group's companies seek to establish and maintain business relationships with counterparties who:

- support the Anti-Corruption Policy;
- conduct business relationships in an honest and fair manner;
- care about their own reputation;
- demonstrate support for high ethical standards;
- implement their own measures to combat corruption;
- participate in collective anti-corruption initiatives.

5.6.2. The Aeroflot Group's companies inform procurement participants/counterparties about programs, standards of conduct, procedures and rules aimed at combating corruption.

5.6.3. As part of the screening of procurement participants/counterparties and assessment of their reliability and integrity, work is carried out to:

- understand the ownership structure of counterparties, including beneficiaries, in particular, ultimate beneficiaries, and the composition of their executive bodies;
- check their reputation, duration of activity in the market, etc.

5.6.4. The following requirements are set for procurement participants/counterparties for screening purposes:

- provision of complete and reliable information about the chain of owners, including beneficiaries, in particular, ultimate beneficiaries, and the composition of the executive bodies together with supporting documents;

- granting of consent to the processing of personal data;

5.6.5. The Aeroflot Group's companies reject any form of incentives for counterparties' employees that could make them dependent on the company and are designed to procure that the employee takes some actions for its benefit, including by giving sums of money, gifts, performing work (services) for him/her on a free of charge basis and in any other ways not mentioned herein.

5.7. Interaction with government authorities exercising control and supervisory functions

The Aeroflot Group's companies pay particular attention to interaction between their employees and public servants due to high corruption risks:

5.7.1. Establish the duty of employees of The Aeroflot Group's companies to refrain from making any offers which, if accepted, could place a public servant in a conflict of interest situation.

5.7.2. Take measures to prevent the commission of administrative offences by The Aeroflot Group's companies provided for in Article 19.28 of the CAO, and in particular prohibit to:

- provide, offer, or promise any money, securities or other property to a public or civil servant on behalf and in the interests of The Aeroflot Group's companies or render property-related services, grant other proprietary rights to him/her or his/her affiliated persons, in return for acts (failures to act) in office in the interests of that servant;

- offer or attempt to give any gifts (including gifts worth less than three thousand roubles) to public civil servants conducting an inspection.

5.7.3. Recommend that employees promptly report to law enforcement authorities any violations by public servants of requirements for official conduct if situations occur where they asked or demanded a bribe while carrying out control and supervisory activities.

5.7.4. In the event of violations committed by public servants while carrying out control and supervisory activities, the companies shall be guided by the provisions of the federal laws and bylaws establishing the procedure for appealing decisions and actions (or inaction) of a body performing a public function and officials, including the pre-trial (extrajudicial) procedure.

5.8. Cooperation with law enforcement authorities in combating corruption

Cooperation with law enforcement authorities is an important indicator of the real commitment of The Aeroflot Group's companies to the declared anti-corruption standards of conduct.

5.8.1. The Aeroflot Group's companies assume a public commitment:

to report to the appropriate law enforcement authorities any cases of corruption and other offences that became known to them;

refrain from retaliation against their employees who reported to law enforcement authorities information about the preparation or commission of corruption and other offences which became known to them in course of their job (official) duties.

5.8.2. The Aeroflot Group's companies assist law enforcement authorities in detecting and investigating instances of corruption, take the necessary measures to preserve and transfer to them documents and information containing data about corruption offences, cooperate with law enforcement authorities by providing assistance to their authorized representatives:

during their inspections of the organization's activities on preventing and combating corruption;

in carrying out measures to suppress or investigate corruption offences, including investigative activities.

5.9. Participation in collective initiatives to combat corruption

5.9.1. The Aeroflot Group's companies not only implement their own measures to prevent and combat corruption, but also take part in collective anti-corruption initiatives.

5.9.2. The Aeroflot Group's companies should consider carrying necessary activities for accession to the Anti-Corruption Charter of Russian Business.

5.10. Consideration and disclosure of information on potential instances of corruption

5.10.1. In order to maintain a high level of confidence in the Aeroflot Group's companies, adhere to international standards of business ethics, create a culture of openness and transparency, understand operations better, detect unethical conduct, and combat fraud and corruption, it is necessary for the Aeroflot Group's companies to develop the confidential whistle blowing system "Hotline".

5.10.2. In case of any doubt regarding the legality of actions of other employees or their counterparties, reasonable suspicion about corrupt acts and other violations that resulted or may result in losses for the Aeroflot Group's companies, a company employee, counterparty, shareholder, investor or any other person may share their concerns through an open dialogue, anonymously if they wish, regarding any issue, including any instances of theft, embezzlement, fraud, bribery, commercial bribery, conflict of interest, other manifestations of corruption, and violations of the provisions of the Anti-Corruption Policy, which became known to them.

5.10.3. The Aeroflot Group's companies accept reports from company employees, counterparties and other persons (individuals and legal entities) on corruption offences committed by employees of the Aeroflot Group's companies via the official websites of the companies, section "Contacting the Airline".

5.10.4. As part of the procedure for notifying about instances of corruption, the Aeroflot Group's companies guarantee:

confidentiality in relation to the person who has notified about an instance of corruption in accordance with the legal requirements;

that an employee who has reported, in good faith, corrupt acts by another company employee or by a counterparty, which became known to him/her, even if such acts are not supported by documents, as well as employees who refused to commit such an offence or participate in it as an intermediary, will not be subjected to any sanctions.

6. Liability

6.1. Liability measures for corruption and other offences in the Aeroflot Group's companies include disciplinary, administrative and criminal liability in accordance with the legislation of the Russian Federation and corporate sanctions imposed in accordance with the local regulations of the Aeroflot Group companies.

6.2. The Aeroflot Group's companies carry out checks on each established fact of corruption to the extent permitted by the legislation of the Russian Federation.

7. Adoption, analysis of application and revision of the Anti-Corruption Policy

7.1. The Anti-Corruption Policy is adopted by the Aeroflot Group's companies in accordance with the laws and regulations of the Russian Federation, charters and constituent documents of the companies and paragraph 3.1 of the Anti-Corruption Policy.

7.2. The Aeroflot Group's companies monitor the implementation and effectiveness of the implementation of the Anti-Corruption Policy.

7.3. The Anti-Corruption Policy of the Aeroflot Group's companies shall be amended in accordance with paragraph 3.1 of the Anti-Corruption Policy in the following cases:

when the provisions of the Anti-Corruption Policy need to be brought in line with changes in Russian and applicable international anti-corruption legislation;

when improving measures for the implementation of the Anti-Corruption Policy.

7.4. Amendments to this Anti-Corruption Policy are posted on the official websites of the Aeroflot Group's companies.

V.G. Saveliev,
Director General

Prepared by V.B. Aleksandrov
Phone: 24-61