APPENDIX
PT 014-2022
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POLICY

FOR PREVENTING AND COMBATING CORRUPTION

segezha group

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DOCUMENT INFORMATION

Document Type	Policy
Annotation	This policy establishes the main provisions and key principles for the activities aimed to prevent and combat corruption, applicable to all companies of Segezha Group
First audit year	2025
Audit frequency	3 years

DRAFTED BY:
Directorate of Economic Security.

TABLE OF CONTENTS

1 Scope of application 03
2 Responsibility for application 04
3 Purpose of the document 04
4 Regulatory references 06
5 Terms, definitions, and abbreviations 07
6 Basic provisions 12
7 Monitoring compliance with the requirements of this policy 27
Appendix A (mandatory)

anti-corruption concept 29

Regulatory document revision sheet 37

1 SCOPE OF APPLICATION

1.1 This Policy discloses the goals and objectives of the Segezha Group PJSC (hereinafter referred to as the "Company") and its subsidiaries or affiliated companies (hereinafter referred to as "SCs") in the field of combating involvement in corruption, determines the legal framework and key principles of this counteraction, describes the measures taken to prevent corruption, establishes the responsibilities of employees of the Company and SCs and other parties in the field of combating corruption, as well as liability for non-compliance (improper compliance) with the provisions of the Policy.

1.2 All employees must be guided by the provisions of this Policy and strictly comply with its rules and requirements.

1.3 The principles and requirements of this Policy apply to counterparties and representatives of the Company and SCs and other parties, in cases where the relevant obligations are fixed in contracts with them, or arise directly from the law.

1.4 In cases where the Policy applies to counterparties, the latter are responsible for compliance with the requirements of the Policy by their employees when carrying out activities with the Company and SCs.

1.5 This Policy was developed in accordance with the requirements of Regulation P 006-2019.

2 RESPONSIBILITY FOR APPLICATION

2.1 The following officials are required to know and use this Policy in their work:

- The President;
- Vice Presidents;
- Divisional leaders;
- Heads of structural divisions;
- All other employees of the Company and SCs.

2.2 Responsibility for the development, revision and modification of this Policy lies with the Directorate of Economic Security (hereinafter DES).

2.3 This Policy establishes the main provisions and key principles for the activities aimed to prevent and combat corruption, which apply to all companies of Segezha Group PJSC.

3 PURPOSE OF THE DOCUMENT

3.1 The objectives of this Policy are:

- Ensuring compliance of the activities of the Company and SCs with the requirements of international and Russian anti-corruption legislation, high standards of business ethics;
- Minimization of the risks of employee involvement of the Company and SCs in corrupt activities;
- Formation of a common understanding among employees of the Company and SCs, investors, contractors, representatives of state and municipal bodies, and other interested parties about the rejection of corruption in any of its forms and manifestations;
- Creation of a local regulatory framework regulating the activities of the Company and SCs to counteract involvement in corruption;
- The main goals and objectives are set out in the Anti-Corruption Concept of Segezha Group PJSC and organizations under its control (Appendix A).

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3.2 The achievement of the set purpose shall be ensured by:

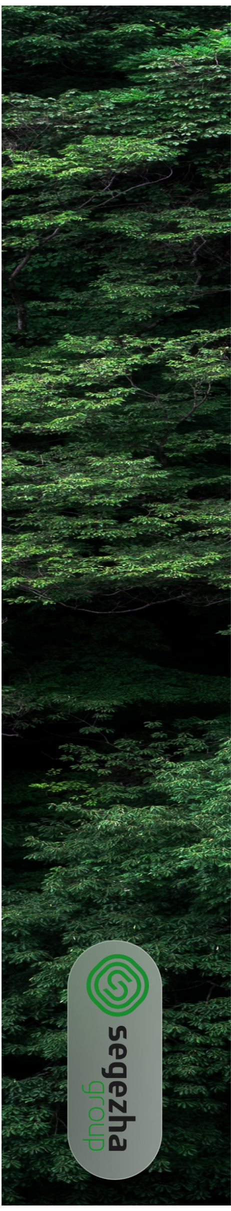
- Implementing anti-corruption procedures based on applicable anti-corruption legislation and bringing them to the attention of employees and other interested parties;

- Establishing the obligation of employees of the Company and SCs to comply with the principles, restrictions and requirements set out in the Policy;
- Ensuring the existence of information channels for reporting facts of corruption;
- Clarifying measures taken in the Company and SCs to prevent corruption.

4 REGULATORY REFERENCES

This Policy uses references to the following regulatory documents:

- United Nations Convention against Corruption of 2003;
- Criminal Law Convention on Corruption of 1999;
- Federal Law dated December 25, 2008 No. 273-FZ "On Combating Corruption";
- Criminal Code of the Russian Federation dated June 13, 1996 No. 63-FZ;
- Code of the Russian Federation on Administrative Offenses dated December 30, 2001 No. 195-FZ;
- Civil Code of the Russian Federation dated November 30, 1994 No. 51-FZ;
- Labor Code of the Russian Federation dated December 30, 2001 N0 197-FZ;
- Methodological recommendations of the Ministry of Labor and Social Protection of the Russian Federation on the development and adoption of measures to prevent and combat corruption by organizations;



- Convention of the Organization for Economic Cooperation and Development (OECD) on Combating Bribery of Foreign Officials in International Commercial Transactions, 1997;
- International Chamber of Commerce Anti-Corruption Rules (as amended in 2011).

5 TERMS, DEFINITIONS AND ABBREVIATIONS

TERM / ABBREVIATION	DEFINITION OF THE TERM / EXPLANATION OF THE ABBREVIATION
Segezha Group PJSC (the Company)	Segezha Group Public Joint Stock Company, whose assets include stakes (including controlling) in the forestry, woodworking, pulp and paper industry, as well as paper packaging enterprises (subsidiaries and/or affiliated companies - DO); in the Russian and international markets of PJSC Segezha Group performs under the brand "Segezha Group"
Group of Companies Segezha	Segezha Group Public Joint Stock Company, as well as its subsidiaries and/or affiliated companies
Subsidiary Companies (SCs)	Subsidiary and/or affiliated company of PJSC Segezha Group
DIA	Department of Internal Audit
DPTD	Directorate of Personnel Training and Development
DES	Directorate of Economic Security

BU SS	Business Unit Security Service
Employees	Individuals who have labor relations with Segezha Group.
Anti-corruption	Purposeful activities of the Employees of the Company and/or SCs for the precaution and prevention of corruption, combat against corruption, minimize and (or) eliminate the consequences of corruption violations, carried out in accordance with the legislation of the Russian Federation, local regulations of the Company and/or SCs within their powers.
Anti-corruption monitoring	Monitoring, analysis, evaluation and forecast of corruption violations, corruption factors, anti-corruption measures, as well as the relevance and implementation of the requirements of the current legislation, regulations governing the implementation of the Anti-Corruption Policy of Segezha Group and SCs.
Corruption factor	A phenomenon or a combination of phenomena that create an opportunity (facilitate) the accomplishment of corruption violations and / or their spread.
Bribery	Transfer of property (cash, items, etc.), provision of services, other property benefits to a public official.
Public official	a) A person who permanently, temporarily or by special authority, performs the functions of representatives of the legislative, executive, judicial authorities of any state; b) A person performing managerial functions, including organizational and administrative or administrative-economic functions, in state and local government bodies of any government, state and municipal institutions, or in the Armed Forces or other military formation of the Russian Federation or foreign states, as well as any other person filling a paid position in the organizations specified in this paragraph;

Public official	c) A person performing managerial functions, including organizational and administrative or administrative- economic functions, in state and municipal enterprises, joint-stock companies, the controlling stake of which is owned by the Russian Federation, subjects of the Russian Federation or municipalities, any other state or its administrative-territorial unit, as well as any other person filling a paid position in the organizations specified in this subparagraph; d) An official of public international organizations; e) Any person performing any public function (auditors, notaries, appraisers, as well as experts, arbitration managers, independent intermediaries, members of labor arbitration, arbitrator judges in the performance of these functions, other persons); f) A leading political figure, an official of a political party, including candidates for political posts.
Commercial bribery	Illegal transfer of money, securities, other property to a person performing managerial functions in a commercial or other organization, provision of property-services to him, provision of other property rights for committing actions (inactions) in the interests of the giver in connection with the official position occupied by this person; illegal receipt by a person performing managerial functions in a commercial or other organization of money, securities, other property, as well as illegal use of property-related services or other property rights for actions (inactions) in the interests of the giver in connection with the official position occupied by this person (article 204 of the Criminal Code of the Russian Federation)
Conflict of interests	A situation in which the personal interest (direct or indirect) of an employee of the management company or subsidiaries affects or may affect the proper performance of his

Conflict of interests	official duties and in which a conflict arises or may arise between the employee's personal interest and the rights, legitimate interests of the Company, which can lead to harm to the rights and legitimate interests of citizens, organizations, Civil Code or the state.
Abuse of authority	Use by a person performing managerial functions in a commercial or other organization of his powers, contrary to the legitimate interests of this organization and in order to derive benefits and advantages for himself or other persons, or to harm other persons, if this act entailed significant harm to the rights and legitimate interests of citizens or organizations, or legally protected interests of Segezha Group or the state (Article 201 of the Criminal Code of the Russian Federation)
Personal interest of the employee	Employee's interest related to the possibility for an employee to receive income in the form of money, valuables, other property or services of a proprietary nature, other property rights for himself or for third parties (including those who are closely related or related to him, citizens or organizations with which the employee, and (or) persons who are closely related or related to him, are connected by property, corporate or other close relations).
Fraud committed by exploiting official position	Theft of someone else's property (Article 158 of the Criminal Code of the Russian Federation) or the acquisition of the right to someone else's property by deception or abuse of trust, committed using one's official position (Part 3 of Article 159 of the Criminal Code of the Russian Federation).
Illegal reward on behalf of a	Illegal transfer, offer or promise on behalf of or

Illegal reward on behalf of a legal entity	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, the provision of property-related services, granting property rights for committing in the interests of this legal entity by 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 an action (inaction) related to their official position (Article 19.28 Code of Administrative Offenses of the Russian Federation)
Anti-corruption clause	An appendix to the agreement, contract of the Company or SC or a section in these documents, according to which the parties agree to prevent the commission of corrupt acts in the implementation of mutual obligations, establishes the consequences of violation of such an agreement
Mediation in bribery	Direct transfer of a bribe on behalf of the bribe giver or bribe taker, or other assistance to the bribe giver and (or) bribe taker in achieving or implementing an agreement between them on receiving and giving a bribe in a significant amount (from 25 thousand rubles), as well as in a large or especially large amount, as well as a promise or offer of mediation in bribery (Article 291.1 of the Criminal Code of the Russian Federation)
Embezzlement	Theft of someone else's property entrusted to the guilty person, committed by a person using his official position (part 3 of article 160 of the Criminal Code of the Russian Federation)
Due diligence	A principle based on the concepts of reasonableness and good faith, according to which, when performing business transactions or making managerial decisions, it is necessary to take into account information sufficient to form a reasonably justified opinion about the presence of signs of dishonesty of the counterparty or a job candidate.
Prohibition of giving bribes (subject of commercial bribery)	Prohibition of providing, offering or promising to provide any benefit of a property or non-property nature directly or through an intermediary in order to influence the decision of another person in his favor or in favor of a third person or organization.
Prohibition of bribery of foreign civil servants	Prohibition of giving bribes to public officials - prohibition of giving, offering or promising to provide (directly or through third parties) to a public official any benefit of a property or non-property nature in order to influence the performance of his official duties in favor of a commercial organization.
Prohibition of receiving bribes (subject of commercial bribery)	Prohibition of commercial bribery - prohibition of receiving, accepting an offer to receive any benefit of a property or non-property nature directly or through an intermediary for actions or inactions that are part of official duties in favor of the person carrying out commercial bribery or third parties.

6 BASIC PROVISIONS

The Company is convinced that one of the most important conditions for sustainable business development is strict compliance with the current legislation regulating the issues of combating corruption.

The Company declares a categorical rejection of dishonest and illegal ways of doing business and voluntarily assumes additional obligations in the field of precaution and prevention of corruption recommended by Russian, foreign and international bodies and organizations.

The Policy was developed in accordance with the legislation of the Russian Federation, the Regulation and other internal documents, taking into account the best corporate management practices.

6.1 KEY PRINCIPLES

6.1.1 Legality

Segezha Group operates in strict accordance with the current Russian anti-corruption legislation.

6.1.2 Non-acceptance of corruption in all forms and manifestations

Segezha Group declares non-acceptance of corruption in any of its forms and manifestations and prohibits all managers, specialists, other employees, as well as persons acting on behalf of the Group or in its interests, directly or indirectly, personally or through intermediaries, to participate in corrupt practices, including offering, promising, giving, requesting and receiving bribes (the subject of commercial bribery) or making payments to simplify administrative, bureaucratic and other formalities in any form, including in the form of money, valuables, services or other benefits of property and non-property nature, to any persons and from any persons or organizations, including commercial and non-commercial organizations, authorities and local governments, government officials, including foreign ones, in order to obtain benefits for themselves, for Segezha Group or for third parties.

6.1.3 Leading example

The Company and SCs should form the ethical standard of an uncompromising attitude towards corruption at all levels, setting an example with their personal behavior.

6.1.4 Business transparency

The Policy and basic information about the activities of the Company, other information subject to disclosure are publicly available on the official website of the Company on the Internet.

In order to provide an opportunity for employees of the Company and SCs and other persons to express concerns on a confidential basis regarding the possible corrupt actions of other employees, the Company has organized a “Hot Line” to receive such appeals, as well as proposals for improving procedures and mechanisms for preventing corruption.

6.1.5 Periodic risk assessment

The Company (annually/quarterly), using all available information, identifies, analyzes and evaluates potential external and internal corruption risks specific to its activities, both in general and in individual areas. Based on the results of the assessment (reassessment) of risks, the Company develops and implements anti-corruption procedures that reasonably and proportionately correspond to the level and nature of the identified risks.

6.1.6 Due Diligence

In order to minimize the risks of involvement in corruption activities, the Company conducts a comprehensive analysis of counterparties, including their reliability, the presence of their own anti-corruption procedures, the absence of a conflict of interests, welcomes their commitment to comply with the principles reflected in the Policy, their willingness to include an anti-corruption clause in contracts, to provide assistance when investigating cases of violation of mutual agreements.

Elements of a comprehensive analysis are used by the Company in recruitment procedures and in the work with personnel in general.

6.1.7 Involvement of employees in combating corruption

The Company aims to form a personal position of non-acceptance of corruption by employees in all its forms and manifestations. Segezha Group takes all necessary measures to implement the Policy at all levels of the organization and bring its content to the attention of its employees, as well as other interested parties.

6.1.8 Monitoring and control

The Company regularly monitors, verifies and evaluates the implemented anti-corruption procedures, and, if necessary, reviews and refines them.

6.1.9 Refusal of retaliatory measures or sanctions

Segezha Group protects the interests of employees who, diligently reported, on condition of anonymity, the facts of theft, embezzlement, fraud, bribery, commercial bribery, conflicts of interests and other offenses known to them by other employees or persons in the Company and SCs, as well as employees who refused to commit similar offenses, or participate in their commission as an intermediary.

Disciplinary penalties cannot be applied to such employees for the reasons above.

The Company's guarantee of non-application of measures and sanctions does not apply if an

internal investigation proves that the relevant report was intentionally false, perjury or slanderous.

6.1.10 Information

The Company makes this Policy freely available on the corporate website on the Internet, openly declares its rejection of corruption, welcomes compliance with the principles of this Policy by all counterparties, clients, its employees, and contributes to improving the level of anti-corruption culture of employees by informing them about the key principles and requirements, and as well as conducting regular trainings in the basic requirements of the Policy and its application in practice.

If any Employee has questions regarding the content of this Policy, including questions of interpretation and application of any of its provisions, as well as doubts about the legality or ethics of their actions, the Employee may seek clarification from the unit responsible for the prevention of corruption violations, or the Directorate of support of contractual work and rule-making in one of the following ways:

- In writing by e-mail;
- By phone or in person during working hours in accordance with the operating mode of the Company.

The specified divisions are obliged to provide explanations within two working days from the date of application.

6.2 MEASURES TO PREVENT CORRUPTION

The Company and SCs implement anti-corruption procedures and measures stated in this Policy, as well as in other internal regulatory documents.

6.2.1 Restrictions on giving/receiving gifts and entertainment expenses.

Segezha Group recognizes that the exchange of business gifts and the realization of reasonable entertainment expenses for business hospitality are an integral part of conducting business and are generally accepted business practices.

At the same time, this practice carries certain corruption risks, since when giving expensive gifts and incurring inflated entertainment expenses, reasonable suspicions may arise that the Company is pursuing selfish interests.

Adhering to the principles of legality and transparency of business, the Company establishes the following requirements for its employees when receiving, giving, exchanging gifts and realizing hospitality expenditures (operations):

- The norms of the Russian anti-corruption legislation and the relevant legislation of the state in whose territory the operation is performed, as well as local regulations and organizational-administrative documents of the Company and SCs, must be fully observed.
- It is prohibited to carry out the transactions in question in favor of any persons with the aim of directly or indirectly influencing decision-making in the interests of the Company and/or SCs.
- It is prohibited to give, receive gifts in the form of cash or non-cash funds, gift certificates, securities, their equivalents.

If an employee has doubts about the legality of his actions to perform certain operations, he should contact his immediate supervisor or the person responsible for monitoring compliance with the Policy to resolve this issue.

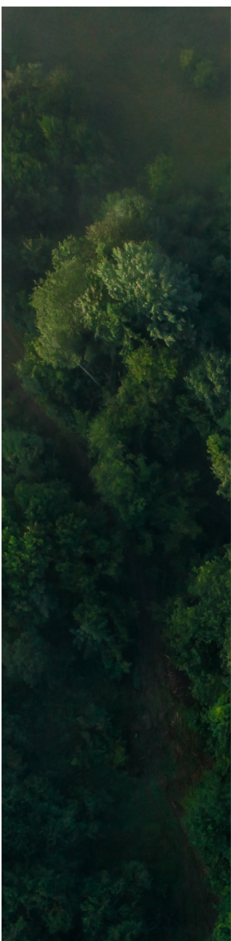
6.2.2 Restrictions on the implementation of charitable and sponsorship activities.

An important component of the activities of Segezha Group as a socially oriented organization is participation in charity and sponsorship.

At the same time, Segezha Group does not provide charitable and sponsorship assistance to state and municipal authorities, commercial and non-commercial organizations, their representatives, as well as other persons with a direct or indirect goal of obtaining benefits or if such assistance can be objectively perceived as aimed at extracting selfish gain.

Information about the charitable and sponsorship activities of the Company is available to the public and is contained on the official website on the Internet.

6.2.3 Refusal to participate in political activities.



Segezha Group does not participate directly or indirectly in political parties, organizations and foundations associated with them, at the same time the Company does not provide sponsorship or make other payments to support them.

In addition, Segezha Group recognizes the right of its Employees in their personal capacity to participate in political activities in their free time, provided that such participation:

Is carried out by Employees on their own behalf and at their own expense (without using the funds and resources of Segezha Group);

Is not associated with Segezha Group and/or its activities;

Does not contradict the rights and obligations of the employee in the performance of official duties in Segezha Group.

6.2.4 Proper interaction with representatives of the state and public organizations.

The interaction of the Company and SCs with law enforcement, regulatory authorities, other state authorities, municipal authorities, their representatives, as well as with public organizations and their representatives is carried out strictly within the framework of the current legislation.

The Company does not make illegal payments in favor of the above bodies, organizations, their representatives and other persons, including payment through intermediaries, payment for recreation, entertainment, transportation and other expenses, in order to obtain or maintain business advantages.

6.2.5 Proper interaction with counterparties, intermediaries, payments in favor of third parties.

The Company strives to develop business relations with counterparties that support the principles of the Policy and have their own effective anti-corruption mechanisms.

When signing civil law contracts, the Compnay and SCs acquaint their counterparties with the provisions of the Policy and propose to include an anti-corruption clause in the texts of contracts that provides additional anti-corruption obligations of the parties and the consequences of committing corrupt actions by any of the parties when fulfilling the terms of the contract.

The Company and SCs refrain from material incentives for representatives of the counterparty, including by providing services, paying money, giving gifts, in order to influence the decision in favor. Employees of the Company and SCs are prohibited from engaging intermediaries, agents and other persons to perform any operations that contradict the requirements of the current legislation, Policies and other local regulations of the Company and SCs.

6.2.6 Conducting due diligence.

The Company and SCs comply with the requirements of the legislation and the rules of reporting documentation. Each fact of economic life is subject to registration of primary accounting documents. Distortion or falsification of accounting, management and other types of accounting data or supporting documents is not allowed.

All financial transactions are recorded reliably, accurately and with the required level of detail. Employees whose competence includes accounting, are responsible for the preparation and submission of complete and reliable reports in a timely manner. Intentional misrepresentation or falsification of reports is not allowed and is prosecuted by law.

6.2.7 Prevention of conflicts of interests.

The Company implements a set of measures to prevent the occurrence of a conflict of interests in order to exclude the possibility of obtaining, personally or through an intermediary, material and (or) other personal benefits due to the presence of employees of the Company and SCs or members of their families, or persons who are closely related to them (parents, spouses, children, brothers, sisters, children of spouses and spouses of children), rights that provide such an opportunity as a result of the use of their official position.

Legal relations related to a conflict of interest are regulated by independent local regulations and organizational and administrative documents of the Company and SCs.

6.2.8 Control and audit.

The Company regularly conducts external and internal audits of financial and economic activities, monitors the employees' compliance with the provisions of the current anti-corruption legislation, the Policy and other local regulations of the Company and SCs.

6.2.9 "Integrated Hotline".

In order to maintain a high level of trust in the Company, compliance with business ethics standards, as well as prevent and suppress cases of fraud and corruption, the Company operates an "Integrated HotLine". "IHL" is a means of direct communication for the prompt resolution of conflict situations, the transfer of any information affecting the interests of the Company and its counterparties.

By contacting the IHL, employees of the Company and SCs, a counterparty, an investor or any other person may, in a form convenient for him, including on condition of anonymity, report the facts of theft and embezzlement in the Company and SCs, fraud, bribery, which have become known to him, commercial bribery, conflicts of interest, other manifestations of corruption and violations of the Policy provisions.

Each appeal is carefully considered, the results of its consideration are brought to the attention of the President of the Company, and if there are grounds, an appropriate check is carried out.

IHL contacts are published on the official website of the Segezha Group PJSC on the Internet, on information stands and in other publicly accessible places.

6.2.10 Identification of departments or officials responsible for the prevention of corruption offenses.

In order to effectively implement the provisions of the Policy, the Company determines the divisions and appoints officials responsible for the prevention of corruption offenses. This decision is formalized by a separate organizational and administrative document.

6.3 OBLIGATIONS OF EMPLOYEES AND OTHER PERSONS IN THE FIELD OF COMBATING CORRUPTION.

6.3.1 Employees of the Company and SCs get acquainted with the Policy and sign an obligation to comply with its norms when hiring.

6.3.2 Compliance with the Policy by an employee is taken into account when assessing the business qualities of an employee, including in the case of his appointment to a higher position, and resolving other personnel issues.

6.3.3 Employees are obliged to strictly comply with the restrictions and requirements stipulated by the Policy:

- giving, receiving gifts;
- implementation of entertainment expenses, charitable and sponsorship activities;
- participation in political activities;
- interaction with representatives of the state and public organizations, with contractors, intermediaries, third parties;
- prevention of conflicts of interests; reporting.

6.3.4 Employees are prohibited from engaging in corrupt practices, including offering, promising, giving, asking for and receiving bribes (the subject of commercial bribery) or making payments to simplify administrative, bureaucratic and other formalities in any form, including in the form of money, valuables, services or other benefits of a property and non-property nature, to any persons and from any persons or organizations, including commercial and non-

profit organizations, authorities and local governments, government officials, including foreign ones, in order to obtain benefits for themselves, for the Company or for third parties.

6.3.5 Employees of the Company and SCs are required to comply with the anti-corruption requirements and restrictions established by other local regulations and organizational and administrative documents (to the extent that does not contradict the Policy).

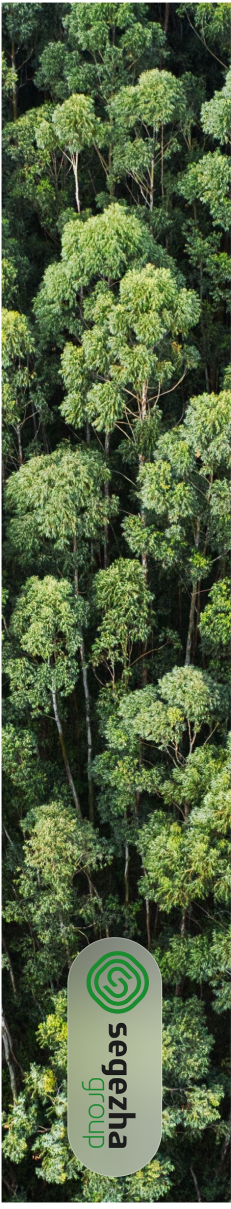
6.4 RESPONSIBILITY FOR NON-FULFILLMENT (IMPROPER EXECUTION) OF THE POLICY.

6.4.1 All employees of the Company and SCs, regardless of their position, are personally liable for non-fulfillment (improper execution) of the provisions of the Policy.

6.4.2 Heads of structural subdivisions of the Company and SCs are responsible for compliance with the Policy by their subordinates.

6.4.3 If there are suspicions of corruption, an internal audit is conducted, the results of which are brought to the attention of the management of the Company.

6.4.4 A person who has committed a violation of the provisions of the Policy may be subject to disciplinary sanctions depending on the culpability, nature and degree of danger of the offense committed, the amount of damage caused or potential damage to the Company and SCs, including damage to business reputation, and other relevant circumstances.



6.4.5 The Company reserves the right to apply to the court with civil law claims against the person who violated the provisions of the Policy, in case of harm.

6.4.6 The Company reserves the right to apply to law enforcement agencies with a statement on bringing a person to administrative or criminal liability in cases where signs of an administrative offense or a criminal offense are seen in his actions.

6.4.7 Employees of the Company and SCs may be held criminally liable for violating anti-corruption laws at the initiative of law enforcement or regulatory/supervisory authorities.

6.4.8 Information on violations of the Policy by decision of the Company's management, may be posted in the public domain (in compliance with the requirements of the law, including the protection of personal data), including on the corporate website, the official website of the Company on the Internet, the corporate newspaper and mass media.

6.5 REPORTING ON THE IMPLEMENTATION OF MEASURES TO PREVENT CORRUPTION AND DEVELOP AN ANTI-CORRUPTION SYSTEM.

The person/unit responsible for the prevention of corruption offenses prepares and submits to the governing bodies the following reports:

- Quarterly report on the implementation of measures to prevent corruption to the President of the Company / the Management Board of the Company.
- Annual report on the implementation of measures to prevent corruption and develop an anti-corruption system to the President of the Company / the Management Board of the Company.
- Annual report for the board of directors, which may include key issues from those considered as part of the annual report to the President of the Company / the Management Board of the Company.

7 MONITORING COMPLIANCE WITH THE REQUIREMENTS OF THIS POLICY

7.1 Compliance with the requirements of this Policy is monitored by the person / unit responsible for the prevention of corruption offenses.

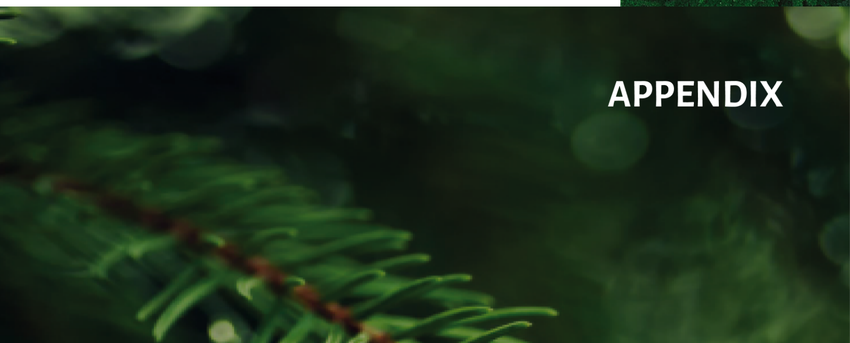
7.2 The requirements of this Policy are subject to revision in case of changes in:

- The requirements of applicable legislation;
- Applicable rules of international law;
- Law enforcement practice and the world's leading anti-corruption practices;
- Interests of the Company or its shareholders, investors, partners, creditors;
- If insufficiently effective provisions of this Policy and the control environment are identified;
- In other cases.

7.3 All employees of Segezha Group have the right to send to the person / unit responsible for the prevention of corruption offenses their proposals regarding the improvement of certain provisions of this Policy, as well as other internal regulatory documents of the Company that regulate the processes related to this Policy. Based on the

results of consideration of such proposals, a decision is made:

- On the timing of the proposed changes;
- About the inexpediency or impossibility of making the proposed changes.



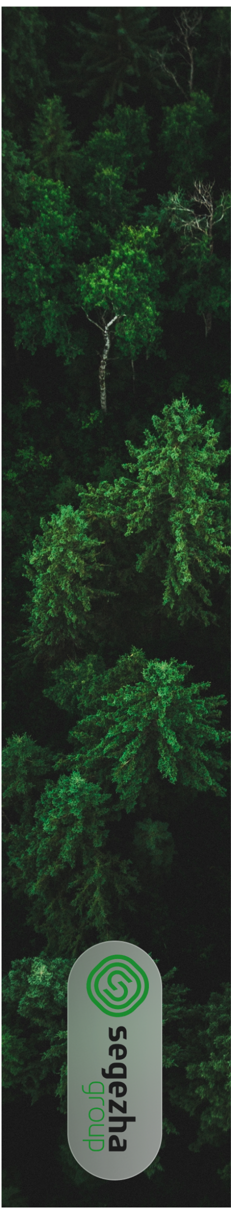
APPENDIX

Appendix A

(MANDATORY)

ANTI-CORRUPTION CONCEPT
OF SEGEZHA GROUP PJSC

1 BASIC PROVISIONS



1.1 Within the framework of combatting corruption, the security units of the Company and SCs take measures to prevent, detect and suppress corruption among the Employees of the Company and SCs in the performance of their official duties, identify and disclose the facts of inaction, covert assistance, as well as other actions (inaction) of the top managers and Employees who cause (or may cause) property damage, reputational and other damage to the interests of the Company and SCs, establishing the facts of the presence of Conflicts of Interest of candidates when applying for a job in the Company, as well as the participation of Employees of the Company and SCs in the activities of commercial structures (for example, by acquiring significant (large / controlling) stakes in companies that are counterparties of the Corporation), lobbying the interests of such counterparties, etc.

1.2 Prevention of corruption violations is the responsibility of all Employees of the Company and SCs.

1.3 In order to ensure effective anti-corruption work, the Concept is based on the following principles:

- Legality;
- Rejection of corruption in any forms and manifestations;
- The inevitability of liability for Corruption;
- Priority application of measures to prevent corruption;
- Involvement of all employees of the Company and SCs in the processes of prevention and detection of corruption;
- An integrated approach to combating corruption and countering fraud and theft;
- Constant interaction between the departments of the Company and SCs, exchange of experience in the framework of combating corruption.

2 ANTI-CORRUPTION SYSTEM

2.1 The Company has an anti-corruption system, which includes a set of constantly improved measures of an organizational, economic, legal, informational nature, carried out by authorized officials of the Company and SCs in order to combat corruption.

2.2 The system of anti-corruption measures includes:

2.2.1 Corruption Prevention Measures:

- Updating, development of local regulatory documents of the Company and SCs on combating and detecting

corruption, identifying Conflicts of Interest and the procedure for their resolution, verifying information about counterparties and third parties;

- Conducting an examination of local regulations of the Company and SCs (drafts of local regulations), for the presence of unreasonably established wide margins of discretion of the Employees of the Companies and SCs or the possibility of unjustified application of exceptions from the general rules, as well as for the establishment of vague, difficult to implement and (or) burdensome requirements for counterparties of the Company and SCs;
- Implementation of anti-corruption monitoring on an ongoing basis (including monitoring of key business processes, including investment, procurement and contractual activities of the Company and SCs);
- Constant monitoring of the economic feasibility of expenses in areas with high corruption risks (including the exchange of business gifts, entertainment expenses, charitable donations, remuneration to external consultants);
- Implementation of anti-corruption mechanisms in the Company's HR policy;
- Formation of competitive environment conditions for participants in procurement procedures conducted for the needs of the Company and/or SCs, countering unfair competition during procurement procedures;
- Implementation of a mechanism to reduce corruption risks in transactions requiring control over compliance with corporate procedures, and transactions related to mergers and acquisitions, as well as the alienation of assets of the Company and/or SCs;

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- Monitoring in the media of reports on corruption in the Company and/or SCs;
- Conducting training events (trainings) on issues related to combating corruption in the Company and SCs by DES (Department of Economic Security), DIA (Department of Internal Audit), DPTD (Directorate of Personnel Training and Development).

2.2.2 Anti-corruption measures:

- Implementation by security units of the Company and SCs within the competence of planned/unscheduled measures in the framework of combating corruption, carrying out measures for internal investigation of corruption, fraud and embezzlement;
- Interaction with public authorities and local governments (including law enforcement and control and supervisory authorities) in the field of anti-corruption;
- Initiation of bringing the perpetrators to legal responsibility, regardless of the position, length of service in the Company and/or SCs, status and other circumstances.

2.2.3 Measures to respond to identified cases of corruption violations in the Company and/or SCs:

- Development of recommendations by the DIA and implementation of proposals by the DES to minimize the consequences of causing damage to the Company and SCs for each fact of corruption violations.
- Initiation of recovery from the perpetrators of the damage caused by corruption violations of the Company and SCs using legal methods in civil, administrative and/or criminal proceedings or using other legal methods.

As part of the annual report on the results of its activities, the owner of the anti-corruption process informs the President and the Ethics Committee of the Company about the implementation of anti-corruption measures of the Company and SCs.

3

IMPROVING THE ANTI-CORRUPTION SYSTEM IN THE COMPANY AND SCS

3.1 Improvement of the anti-corruption system in the Company and SCs is achieved by:

3.1.1 Conducting an analysis of the effectiveness of the system of anti-corruption measures in the Company and SCs;

3.1.2 Conducting an analysis of anti-corruption activities in the Company and SCs and affiliates during the reporting period;

3.1.3 Updating, developing and implementing a program of measures aimed at improving the efficiency of the anti-corruption system;

3.1.4 Identification and elimination of deficiencies in the anti-corruption system;

3.1.5 Interaction of the Company and SCs in the

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implementation of the goals and objectives of this Concept;

Unification of documents regulating the anti-corruption activities of the Company and SCs.

4 USE OF INFORMATION RESOURCES IN THE IMPLEMENTATION OF ANTI-CORRUPTION MEASURES

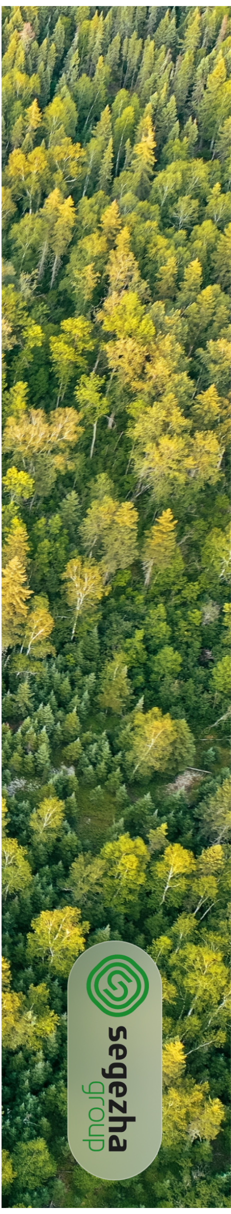
4.1 The Company and SCs inform a wide range of people on an ongoing basis about the possibility and necessity of sending reliable information to the Company and SCs about suspicions and facts of corruption in the Company and/or SCs.

4.2 Contractors, employees and other persons may report on cases of corruption in the Company and/or SCs to the section for receiving applications on the corporate website of Segezha Group (the "Integrated Hotline") on the Internet.

5 CONCLUSION

5.1 The procedures, rules and requirements

established by this Policy are detailed but not exhaustive and may be additionally regulated by other internal documents of the Company, as well as applicable legal requirements.

5.2 This Policy has been drawn up taking into account the applicable requirements, rules and procedures of the legislation as of the date of its approval. If, as a result of changes in the requirements, rules and procedures of the legislation, individual clauses, articles or sections of this Policy become incomplete or irrelevant, then until the moment changes are made to this Policy, the Company, SCs, their Members of management bodies and employees will be required to be guided by the legal requirements in force at the relevant time.