



Translation from Russian into English

REGULATIONS OF COOPERATION WITH STATE AUTHORITIES

1. General provisions.

HMS Group seeks to establish and maintain strong relations with state authorities and local governments (hereinafter – the “authorities”), both within the Russian federation and foreign states, where HMS Group conducts its business.

HMS Group develops the relations with the authorities on the basis of the parties’ independence principle, the strict observance of all regulations and rules of business behavior in the Russian Federation and abroad.

HMS Group confirms the adherence to the close cooperation in all spheres of its activity with the authorities of the Russian Federation and foreign states where HMS Group executes its business activity.

HMS Group is open to the constructive dialogue with the representatives of the state authorities for the purpose of maximum observation of the law and protection of public interests.

HMS Group assumes liability to abstain from any interaction with representatives of the authorities, crossing law and ethical standards, and also prejudicing the business reputation of HMS Group.

2. Communication rules of HMS Group employees with representatives of the authorities.

All HMS Group employees cooperate with the authorities within HMS Group activity on the basis of the following rules:

2.1. Any interaction with the authorities’ representatives within HMS Group activity assumes an official communication style subject to the basic ethical standards of business conduction;

2.2. Gifts and hospitality signs acceptable between business partners can be unacceptable from the legal and ethical points of view in relations with the representatives of authorities;

2.3. Any lucre received by the authorities’ representative from HMS Group employees within HMS Group activity, should be in the range permitted by the legislation of that state, which representative received such a lucre;

2.4. HMS Group employees have the right to grant lucre to the representatives of authorities of the Russian Federation in the form admissible by the legislation of the Russian Federation and regulation of the Russian ethics at the rate of no more than 3,000 (three thousand) Russian rubles, or its equivalent, within one quarter;

2.5. HMS Group directs attention that the recommended form of granting or receipt of lucre for HMS Group employees to or from the authorities’ representatives is a business gift;

2.6. A business gift (one or several items) can include corporate souvenirs with the logotype of HMS Group or the national symbols of the Russian Federation or foreign countries, as well as other items which are considered as standard business gifts in the Russian Federation and abroad (diaries, calendars, national souvenirs etc.);

2.7. Lucre includes as well any form of payment for food and beverage, any form of compensation for business travel expenses, participation in seminars, conferences and other events, expenses on tourist trips and other kinds of entertainment;

2.8. Lucre includes also providing the authorities’ representative by HMS Group employee with immaterial services that have direct relation to material benefits (for example, job placement or job promise to the authorities’ representative), if such services contravenes the legislation and the ethical standards;

2.9. Any permissible form of lucre gift or receipt to/from the authorities’ representative within the range of permissible amount, specified in sub-close 2.4, should be agreed by HMS Group employee with his immediate supervisor. In case of disputable and ambiguous situations, HMS Group employee should submit an approval request in writing to the Workgroup and/or the TM Representative. The Workgroup and the TM Representative consider the request during 3 (Three) working days and give their approval or rejection;

2.10. All aforesaid rules and restrictions also concern lucre provision to close relatives of the authorities’ representative;

2.11. All aforesaid rules and restrictions become effective when the representative of authorities grants lucre to HMS Group employee within the frame of HMS Group activity, including the cases of gratitude for providing of the information about HMS Group and fulfillment of other actions concerned the interests of HMS Group.

2.12. All aforementioned position also concern to holding of tenders and other auction events where HMS Group participates.

3. Procedure of HMS Group employees' reaction to potential situations of corruption type.

In HMS Group the following procedure of reaction to potential situations of corruption type within the frame of cooperation with for-profit and non-profit organizations is implemented:

3.1. If HMS Group's employee suspects any corruption, he should immediately report about his suspicions to the Representative of the HMS Group Top Management (the "TM Representative) via "hot line" and/or to the Head of Security of HMS Group LLC. The employee has also right to notify his supervisor;

3.2. HMS Group's employee is obliged to inform the TM Representative and/or the Head of Security about all cases of extortion by public officer;

3.3. The TM Representative together with the Workgroup decide further steps and measures of the corresponding reaction to the information, presented by the employee according to the Anticorruption policy of HMS Group