



Translation from Russian into English

REGULATIONS OF COOPERATION WITH PROFIT AND NON-PROFIT ORGANIZATIONS

1. General provisions.

HMS Group seeks to develop business relations with its profit and non-profit partners, based on mutual trust and interest.

In its activity HMS Group seeks to avoid situations leading to the conflict of interests, corruption and negative influence on HMS Group reputation in exchange of gifts and gratuitous services with suppliers, clients and other HMS Group partners.

2. Communication rules for HMS Group employees in relation to profit and non-profit organizations.

- 2.1. Any interaction of HMS Group employees with representatives of Russian and foreign profit and non-profit organizations within HMS Group activity assumes business communication style subject to basic ethical standards of business conduction in the Russian Federation and relevant foreign states;
- 2.2. Any interaction of HMS Group employees with representatives of profit and non-profit organizations within HMS Group activity assumes lack of material and/or other interest (except interest in positive results of HMS Group activity) and/or dependences on relevant profit and non-profit organizations;
- 2.3. HMS Group admits that exchange of business gifts and services between HMS Group employees and representatives of profit and non-profit organizations promotes development of good business relations;
- 2.4. HMS Group permits HMS Group employees to provide representatives of profit and non-profit organizations with lucre (including services connected with it) at the rate of not more than 3,000 (three thousand) Russian rubles, or its equivalent, and in the form permitted by the legislation of the Russian Federation and the Russian business ethics regulations (or the legislation and ethics of a foreign state where HMS Group grants lucre);
- 2.5. HMS Group also permits HMS Group employees to receive lucre from profit and non-profit organizations in the permissible size and form;
- 2.6. HMS Group notices that the recommended form of granting or lucre receipt for HMS Group employees from representatives of profit and non-profit organizations is the form of a business gift;
- 2.7. The business gift (one or several items) can include corporate souvenirs with a logotype of an organization-donor and other items, which are considered as standard business gifts in the Russian Federation and abroad (diaries, calendars, national souvenirs, etc.);
- 2.8. HMS Group also permits HMS Group employees to provide with and receive lucre in the form of payment for food and beverage ordered at business breakfasts, lunches and dinners within the permitted amount;
- 2.9. HMS Group supports participation of HMS Group employees supports in seminars, roundtable discussions, conferences and other events, organized both at third parties' expense or HMS Group expense, and inviting to these events of representatives of profit and non-profit organizations, for business relations development and maintenance purposes;
- 2.10. HMS Group employees have the right to participate in charities as HMS Group representatives and on its behalf by agreement with a Representative of HMS Group Top-Management;
- 2.11. In particular cases, amount of all aforesaid types of lucre granting and reception by HMS Group employees can overdraws the permissible amount. Top management of HMS Group can exceed the permissible amount within reasonable limits at its discretion and based on business reasonability. Other HMS Group employees should approve the excess of the permissible amount with the TM Representative in the written request form.
- 2.12. All aforesaid types of lucre granting and reception should not be connected with granting or receipt of any privileges and preferences by HMS Group and/or its partners on commercial or other activity to the prejudice of business intercourse traditions and regulations of the business ethics of the Russian Federation and foreign states where HMS Group performs appropriate activity;
- 2.13. All aforesaid provisions also relates to organization of tenders and other auction events, where HMS Group participates at.

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

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

- 3.1. In case HMS Group employee has relevant suspicions, he should report immediately about them to the Representative of the Top Management of HMS Group using the "hot line" and/or to the Security Director of "MC" HMS Group", as well as he can notify his immediate Supervisor;
- 3.2. HMS Group employee is obliged to inform the TM Representative and/or the Security Director about all cases of lucre extortion by representatives of profit and non-profit organizations within the bounds of HMS Group activity
- 3.3. The TM Representative together with the Workgroup makes a decision about measures of the proper reaction to the information provided by HMS Group employee, in accordance with the Anticorruption policy of HMS Group.