

Anti-bribery & corruption policy

O1 Properties recognizes the importance of maintaining high legal and ethical standards in its operations. The Anti-Corruption and Anti-Bribery Policy (hereinafter referred to as the “Policy”) sets out the general rules and principles that the company adheres in order to conduct business in a fair, responsible and transparent manner.

Corruption reduces the efficiency of economic entities and has devastating consequences for society. We do not tolerate corruption, bribery or fraud in any form and do not condone any illegal or unethical activity. We are guided by the Code of Ethics, the tender procedures policy and other internal regulations that guarantee the transparency, legality and ethics of all processes in the company.

Anti-corruption standards

O1 Properties undertakes to strictly comply with applicable anti-corruption laws:

- Federal Law of the Russian Federation No. 273-FZ “On Combating Corruption”.
- Criminal Code of the Russian Federation.
- UN Convention against Corruption.

The Company strictly prohibits to directly or indirectly offer or provide cash payments, benefits or other benefits to government officials, political parties or party officials or candidates for the purpose of:

- influence on decision makers in the area of their responsibility;
- obtaining or maintaining business contracts for the company;
- influence on any legislative, administrative or judicial decisions.

No company representative is not allowed directly or indirectly:

- to offer, do, or promise anything of value to a government official for the purpose of gaining a business advantage or influencing on the decision of that official;
- to make facilitation payments to influence on the decision of a government official in the course of casual government activities.

The company has a hotline that employees or counterparties of the company can contact if they become aware of certain cases of violation of the provisions of the Policy, The Code of Ethics and other actions that may damage the business reputation of the company.

Execution of the policy and control of its execution

The provisions of the policy apply to all employees working at all levels of the company and must be followed by them.

The policy also applies to business partners and contractors who provide services for or on behalf of O1 Properties. We expect these individuals and/or organizations to adhere to the provisions of the policy or implement similar policies and procedures in their work.

The company's security department is responsible for implementing the policy.

Any violation of the provisions of this policy must be immediately reported to the responsible workers in the company.

The Company is committed to communicating the policy to its stakeholders. The policy must be available to the public on the company's website.