APPROVED

Manager of OOO "Aviation Supplies and Service"

January 09, 2018

**REGULATION**

**on anti-corruption policy**

**OOO "Aviation Supplies and Service"**

1. General

1.1. Anti-corruption policy (hereinafter - the Policy) OOO "Aviation Supplies and Service" was developed in accordance with the provisions of the Federal Law of December 25, 2008 N 273-FZ "On Combating Corruption", Methodological Recommendations for the development and adoption of organizational measures to prevent and combat corruption, approved by Ministry of Labour and Social Protection of the Russian Federation.

1.2. The policy of OOO "Aviation Supplies and Service" (hereinafter referred to as the Company) is a basic document that defines the main tasks, principles and directions of anti-corruption activities, the purpose of which is to coordinate the activities of the Company's employees in the implementation of anti-corruption measures aimed at preventing, detecting and suppressing corruption offenses in the Company.

2. Goals and objectives of anti-corruption policy implementation

2.1. The purpose of the Policy is to develop and implement versatile and consistent measures aimed at preventing and suppressing corruption offenses in the Company's activities, forming an anti-corruption consciousness characterized by intolerance of the Company's employees to corruption offenses.

2.2. The objectives of the Company's Policy:

- formation among employees a uniform understanding of the Company's position on the rejection of corruption in all forms and manifestations;

- minimizing the risk of involvement of the Company and its employees in corruption activities, regardless of the position held;

- prevention of corruption offenses and ensuring responsibility for corruption offenses;

- formation of anti-corruption corporate consciousness;

- establishing the obligation of the Company's employees to know and comply with the principles and requirements of this Policy, key norms of the applicable anti-corruption legislation.

3. Concepts and definitions used in anti-corruption policy

Corruption - abuse of office, giving a bribe, accepting a bribe, abuse of authority or other illegal use by an employee of the Company of his official position contrary to the legitimate interests of the Company and the state in order to obtain benefits in the form of money, valuables, other property or services of a property nature, other property rights for oneself or for third parties, or illegal provision of such benefits to the specified person by other individuals. Corruption is also the commission of the listed acts on behalf of or in the interests of a legal entity (clause 1 of Article 1 of Federal Law No. 273-FZ of December 25, 2008 "On Combating Corruption").

Countering corruption - the activities of the Company and its employees within their authority (paragraph 2 of Article 1 of Federal Law No. 273-FZ of December 25, 2008 "On Anti-Corruption"):

а) for the prevention of corruption, including the identification and subsequent elimination of the causes of corruption (prevention of corruption);

б) to identify, prevent, suppress, disclose and investigate corruption offenses (combating corruption);

в) to minimize and (or) eliminate the consequences of corruption offenses.

Taking a bribe is the receipt by an official of the Company personally or through an intermediary of money, securities, other property, or in the form of illegal provision of services of a property nature, provision of other property rights for actions (inaction) in favor of the bribe giver or persons represented by him, if such actions ( inaction) are included in the official powers of an official, or if, by virtue of his official position, he can contribute to such actions (inaction), as well as for general patronage or connivance in the service.

Commercial bribery - illegal transfer of money, securities, other property to a person performing managerial functions in the Company, provision of property services to him, provision of other property rights for performing actions (inaction) in the interests of the giver in connection with the official position held by this person.

Conflict of interest is a situation in which the personal interest (direct or indirect) of an employee of the Company affects or may affect the proper performance of his official (labor) duties and in which a contradiction arises or may arise between the personal interest of the employee and the rights, and the legitimate interests of the Company, which may lead to harm to the rights and legitimate interests, property and (or) business reputation of the Company, of which he is an employee.

Personal interest of an employee - the interest of an employee of the Company associated with the possibility of an employee receiving income in the form of money, valuables, other property or services of a property nature, other property rights for himself or for third parties when performing his official (labour) duties.

Counterparty - any Russian or foreign legal entity or individual with whom the Company enters into contractual relations, except for labour relations.

4. Basic anti-corruption principles of of the Company

4.1. The principles of the Company's Policy are:

- the principle of non-acceptance of corruption in any forms and manifestations in the implementation of daily activities, including in interaction with counterparties, representatives of authorities, self-government, their employees and other persons;

- the principle of personal example of leadership. The head and other top executives of the Company must form an ethical standard of irreconcilable attitude towards any forms and manifestations of corruption at all levels, thus setting an example by their behaviour;

- priority of measures to prevent corruption and moral principles of the fight against corruption;

- inadmissibility of establishing privileges and immunities limiting liability or complicating the procedure for bringing to responsibility a certain group of employees of the Company who have committed corruption;

- inadmissibility of restricting access to information about facts of corruption and measures of the Policy;

- monitoring and control. The Company monitors corruption risks, including the causes and conditions of corruption, in the procurement activities for the needs of the Company and elimination of identified corruption risks;

- information and training. The Company publishes this Policy in the public domain on the Internet on the Company's website, openly declares its rejection of corruption, welcomes and encourages compliance with the principles and requirements of this Policy by all counterparties, and contributes to an increase in the overall level of anti-corruption culture of employees through information and training.

5. Anti-corruption policy scope and circle of

persons falling under its influence

5.1. This Policy is intended for use by the Company's employees responsible for the implementation of anti-corruption measures in terms of compliance with the principles and requirements of this Policy and the key norms of the applicable anti-corruption legislation.

The circle of persons falling under the Policy are employees of the Company who are in labour relations with it, regardless of the position held and the functions performed.

The principles and requirements of this Policy apply to counterparties, as well as to other persons in cases where the corresponding obligations are enshrined in contracts with them, in their internal documents, or are direct result from the current legislation.

6. Persons responsible for the implementation of anti-corruption

policies in the Company, and their duties related to

preventing and combating corruption

6.1. Effective management of the Company's anti-corruption activities is achieved through productive and operational interaction of the following participants:

Company Manager:

- approves this Policy;

- reviews and approves changes and additions to the Policy;

- determines an official from among the Company's employees who is responsible for the prevention of corruption and other offenses;

- creates a commission for combating corruption in the Company;

- controls the overall results of the implementation and application of the Policy;

- is responsible for organizing all activities aimed at implementing the principles and requirements of the Policy;

- organizes training activities on prevention and combating corruption and individual counseling of employees;

- renders assistance to authorized representatives of regulatory authorities and law enforcement agencies during their inspections of the activities of the Company on issues of prevention and combating corruption;

- renders assistance to authorized representatives of law enforcement agencies in carrying out measures in the Company to suppress or investigate corruption crimes, including operational-search measures;

- takes measures to prevent corruption in the Company.

An official who is responsible for the prevention of corruption and other offenses:

- develops and submits for approval to the head of the Company draft local regulations aimed at implementing measures to prevent corruption;

- carrying out control measures aimed at revealing corruption offenses by the Company's employees;

- accepts notifications about the fact of applying for the purpose of persuading employees to commit corruption offenses, as well as about cases of committing corruption offenses by employees of the Company, and notifications about a conflict of interests of employees of the Company;

Anti-Corruption Commission:

- evaluates corruption risks;

- reviews reports on incidents of persuading employees to commit corruption offenses in the interests of or on behalf of another organization, as well as on cases of committing corruption offenses by employees, contractors of the Company or other persons;

- evaluates the results of anti-corruption work and prepares relevant reporting materials for the head of the Company;

- takes measures to prevent corruption in the Company;

- takes measures to prevent and resolve conflicts of interest, considers notifications of conflicts of interests of the Company's employees.

7. Obligations of the Company's employees related to

preventing and combating corruption

7.1. The Company's employees are obliged:

- refrain from committing and (or) participating in committing corruption offenses in the interests of or on behalf of the Company;

- refrain from behaviour that can be interpreted by others as a willingness to commit or participate in the commission of a corruption offense in the interests of or on behalf of the Company;

- immediately inform the immediate manager, the person responsible for the implementation of the anti-corruption policy, the management of the Company about incidents of persuading an employee to commit corruption offenses;

- immediately inform the immediate manager, the person responsible for the implementation of the anti-corruption policy, the management of the Company about information that has become known to the employee about cases of corruption offenses by other employees, contractors of the Company or other persons;

- inform the immediate manager, the person responsible for the implementation of the anti-corruption policy, the management of the Company about the possibility of a conflict of interest or arisen conflict of interest of the employee.

8. List of anti-corruption measures

implemented by the Company

8.1. Regulatory support, reinforcement of standards of conduct and declaration of intent:

- development and implementation of the Regulation on Conflict of Interest and a sample declaration of a conflict of interest;

- introduction of a standard anti-corruption clause into contracts related to the Company's business activities;

- introduction of anti-corruption provisions into job descriptions of the Company's employees;

- development and approval of other local regulations of the Company on the prevention and avoidance of corrupt behaviour.

8.2. Development and introduction of special anti-corruption procedures:

- introduction of a procedure for informing the employer by the Company's employees about cases of inciting them to commit corruption violations and the procedure for considering such messages;

- the introduction of a procedure for informing the employer about information that has become known to the employee about cases of corruption offenses by other employees, counterparties and other persons and the procedure for considering such messages;

- introduction of a procedure for informing the employer about a conflict of interest occurrence and procedure for its settlement;

- conducting periodic assessments of corruption risks in order to identify the areas of activity most susceptible to such risks, and developing appropriate anti-corruption measures.