

APPROVED

by Order of Rosatom South Asia
Marketing (India) Private Limited
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REGULATIONS
ON EXCHANGE OF BUSINESS GIFTS AND TOKENS OF
BUSINESS HOSPITALITY IN

Rosatom South Asia Marketing (India) Private Limited

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1. General Provisions

- 1.1. Regulations on Exchange of Business Gifts and Tokens of Business Hospitality in the Foreign Regional Centers of the State Corporation Rosatom - Rosatom South Asia Marketing (India) Private Limited (hereinafter referred to as “Regulations”) are framed in accordance with the Federal Law of the Russian Federation dated 25.12.2008 No. 273-FZ “On Combating Corruption”, other regulatory legal acts of the Russian Federation, the Code of Ethics and official conduct of Employees of Private institution RAIN and Rosatom South Asia Marketing (India) Private Limited, and are based on generally accepted moral principles and norms of Russian society and the state.
- 1.2. The Regulations shall define uniform requirements for all Employees in Rosatom South Asia Marketing (India) Private Limited (hereinafter referred to as “Employees”, and the “RC” respectively) for giving and accepting Business Gifts.
- 1.3. The RC shall maintain a corporate culture wherein Business Gifts and tokens of Business Hospitality shall be considered by Employees of the RC only as a tool for establishing and maintaining business relationships and as a manifestation to the international comity in the course of the RC’s activities.
- 1.4. The RC follows principle that long-term business relationships should be based on trust and mutual respect in the RC. Acts or actions within the relationships which violate the law and the principles of business ethics harm the reputation of the RC and the honor of its Employees and cannot ensure sustainable long-term development of the RC. Such kind of relationships shall not be acceptable in the practice of the RC.
- 1.5. The Regulations shall apply to all Employees of the RC, regardless of their

level or position.

- 1.6. It is important, that Employees representing the interests of the RC or acting on its behalf, understand the limits of acceptable behavior in respect of exchange of Business Gifts and extension of Business Hospitality.
- 1.7. While using the terms describing Hospitality, “Business Hospitality”, “Corporate Hospitality” in the present Regulations, all provisions of these Regulations shall apply to them in the same way.

2. Main Goals

The present Regulations shall pursue the following goals:

Providing a uniform understanding of the role and functions of Business Gifts, Business Hospitality, representational events in the business practice of the RC;

Implementation of economic and income-generating activities of the RC solely on the basis of appropriate standards and rules of business behaviour based on the principles of competition protection, quality of work, services, and avoidance of a conflict of interest;

Determination of uniform requirements for giving and accepting Business Gifts for all Employees of the RC, for organizing and participating in representative events;

Minimizing the risks associated with possible abuse in respect of Gifts, representative events etc. The most serious of these risks are the dangers of tampering and bribery, unfairness to contractors, protectionism and

favouritism within the RC.

3. Regulations on Exchange of Business Gifts and Tokens of Business Hospitality in the Regional Centre

- 3.1. The Employees of the RC may receive Business Gifts, tokens of Business Hospitality only at the official events, provided that it does not conflict with the requirements of the anti-corruption legislation of the Republic of India and Russian Federation, the present Regulations as well as any local regulatory acts of the RC etc.
- 3.2. Gifts and services approved as well as provided by the RC shall be transferred and accepted only on behalf of the RC as a whole, and not as a gift or transfer from an individual Employee of the RC.
- 3.3. While interacting with the persons holding positions in the State (Municipal) services, the Employees shall be guided by the principles and provisions regulating ethical norms and rules of official conduct of state (municipal) service Employees.
- 3.4. Business Gifts to be deposited and tokens of Business Hospitality that Employees of the RC on behalf of the RC may transfer to other persons and organizations, or receive on behalf of the RC and other persons and organizations in connection with their work activities, must simultaneously meet the following criteria:

Be directly related to the statutory objectives of the RC activities;

Be reasonable, proportionate and not objects of luxury;

The value of the gift shall not exceed 3,000.00 Roubles;

Expenses shall be approved by the Head of the RC;

Shall not constitute a hidden reward for a service, action or inaction, connivance or patronage, granting of rights or taking certain decisions, or an attempt to influence the recipient with another illegal or unethical purpose;

Shall not create obligations on the recipient, related to his official position or the performance of official (job) duties;

Shall not create a reputational risk for the RC, Employees and other persons in case of disclosure of information on gifts made or representation expenses incurred;

Shall not conflict with the principles and requirements of the anti-corruption legislation of the Russian Federation, the present Regulations, the anti-corruption policy of the RC, the Code of Ethics and other local acts of the RC and generally accepted standards of morality and ethics.

- 3.5. Business Gifts, including in the form of service delivery, tokens of high esteem and participation in entertainment and similar events shall not put the receiving party in a dependent position, lead to any reciprocal obligations on the part of the recipient or affect the objectivity of his business judgments and decisions.
- 3.6. To establish and maintain business relationships and as a manifestation of international comity, Employees may present representative gifts to third parties and receive same from them. Representative gifts shall mean souvenirs (including those with the logo of the RC), flowers, confectionery and similar

products.

- 3.7. While receiving a Business Gift or tokens of Business Hospitality, an Employee shall be obliged to take measures to prevent the occurrence of a conflict of interest in accordance with the Conflict of Interest Regulation approved by the local regulatory act of the RC.
- 3.8. Rights and obligations of Employees in the exchange of Business Gifts and tokens of Business Hospitality:
 - 3.8.1. Employees representing the interests of the RC or acting on its behalf shall understand the limits of acceptable behavior in the exchange of Business Gifts and tokens of Business Hospitality.
 - 3.8.2. Employees of the RC shall have the right to give and receive Business Gifts from third parties, organize and participate in representative events, provided it is legal, ethical and is done exclusively for business purposes as defined by the present Regulations.
 - 3.8.3. The value and frequency of giving and receiving Business Gifts and / or participation in representative events of the same third party shall be determined by business need and shall always be reasonable. Accepted Business Gifts and Business Hospitality shall not give rise to any reciprocal obligations on the part of the recipient and / or affect the objectivity of his business judgments and decisions.
 - 3.8.4. In the event of any doubt about the legality or ethical nature of their actions, the Employees of the RC shall notify the Head of the RC and consult with him before giving or receiving gifts or participating in certain representative

events.

- 3.8.5. The Employees shall not have the right to use their official position for personal purposes, such as the use of the property of the RC, including:

For receiving gifts, reward and other benefits for themselves and other persons in exchange for the delivery of any services by the RC, the implementation or non-implementation of certain actions, the transfer of information constituting a commercial secret;

For receiving gifts, reward and other benefits for themselves and other persons in the process of doing business of the RC, including both before and after negotiations on the conclusion of civil law contracts and other transactions.

- 3.8.6. Employees are advised not to accept or transfer gifts or services in any form from third parties as gratitude for any service or advice given.
- 3.8.7. It shall not be permissible to transfer and accept gifts from the RC, its Employees and representatives in the form of money, both cash and non-cash, regardless of currency, as well as in the form of shares, options or other liquid securities.
- 3.8.8. Employees must waive offers, gifts, payment for their expenses, etc., when such actions may influence or create an impression of the influence on the outcome of the transaction, the result of bidding, the decisions taken by the RC, etc.
- 3.8.9. Administration of the RC does not accept corruption. Gifts shall not be used

to give/take bribes or corruption in all its forms.

3.8.10. As gifts, Employees of the RC shall strive to use souvenirs, objects and products that have symbols of the RC in the maximum allowable number of cases.

3.8.11. Gifts and services shall not put in question the image or business reputation of the RC or its Employee. Any Employee who received a Business Gift shall be obliged to inform the Head of the RC about this.

3.8.12. Any Employee shall not be entitled to offer to third parties or accept from them gifts, payments, compensation, etc., incompatible with accepted business practices and not meeting the requirements of good form, which cost more than 3,000 (Three thousand) rubles or do not comply with the law. If an Employee is offered such gifts or money, he must immediately notify the immediate supervisor.

3.8.13. An Employee of the RC who in the performance of his duties is offered gifts or other reward remuneration both directly and indirectly that can affect the decisions prepared and/or taken by him or influence his actions (inaction), must:

reject them and immediately notify the immediate supervisor of the fact of the gift (reward) offer;

if possible, exclude further contacts with the person who offered a gift or reward, unless it is related to business need;

if it is not possible to reject or return a gift or reward, transfer it with a

corresponding official note to take appropriate measures to the Head of the RC and continue working in the manner prescribed in the RC on the issue with which the gift or reward was associated.

3.9. In the event of a conflict of interest or the possibility of a conflict of interest in receiving a Business Gift or tokens of Business Hospitality, an Employee is required to notify the official of the RC responsible for fighting corruption in writing in accordance with the conflict of interest disclosure policy approved by the local regulatory act of the RC.

3.10. Employees of the RC are not allowed to:

Accept proposals from organizations or third parties for the delivery of Business Gifts and the extension of tokens of Business Hospitality, Business Gifts and tokens of Business Hospitality during business negotiations, when concluding contracts, as well as in other cases when such actions may influence or create impression of their influence on the decisions taken;

Accept Business Gifts, etc. in the course of bidding and during direct negotiations when concluding Agreements (Contracts);

Request, demand, force organizations or third parties to give them or their relatives Business Gifts and/or provide tokens of Business Hospitality in their favor;

Accept gifts in the form of cash, non-cash money, securities, precious metals.

3.11. In the case of holding sponsorship, charity programs and events, the RC must first ensure that the assistance provided by the RC will not be used for

corruption purposes or in any other illegal way.

3.12. The RC may decide to participate in charity events aimed at creating the image of the RC. At the same time, the budget and the plan for participation in the events shall be agreed with the Head of the RC.

3.13. Failure to comply with the present Regulations may be a ground for initiating disciplinary, administrative, criminal and civil measures to an Employee in accordance with applicable law.

4. Scope of Application

4.1. The Procedures prescribed herein shall be mandatory for each and every Employee during the period of work in the RC.

4.2. The Procedures prescribed herein shall be applied regardless of how Business Gifts and tokens of Business Hospitality are transmitted, directly or through intermediaries.