



Marine Arctic Geological Expedition

ANTI-CORRUPTION POLICY

Objective:

The objective of the Policy is to minimize the risk of involving employees and the Company in corrupt activities, ensure compliance with the applicable anti-corruption law, and prevent damage to the Company's reputation.

Obligations of Company employees:

- Set the example of integrity and faithful behavior, not to give or accept bribes;
- Use Company resources for its purposes and not to abuse them;
- Clearly differentiate between personal interests and Company interests, avoid conflicts of interest, not to accept gifts and offers that contradict these principles;
- Report any cases involving attempts to deviate from these principles to managers;
- Consciously support and defend our principles.

Dealing with Partners and Customers:

- Never offer disproportionate gifts that could be regarded as hidden payments for services;
 - Never pay for entertainments beyond the conventional business entertainment expenses;
- Never engage intermediaries to perform actions contradicting this Policy.

Obligations of the Company Management:

- Follow this Policy and set the example for the employees;
- Support openness and transparency in all activities of the Company, including finance and procurement;
- Adhere to the principle of mutual responsibility of business and the state, cooperate with all subjects of the Anti-Corruption Policy in activities aimed to root out corruption;
- Make HR decisions based on the Policy requirements.

Employees reporting violations of this Policy shall not be subjected to punishment.

24.02.2021

Director General,
JSC MAGE



A.G. Kazanin