

	Gifts and Hospitality Policy of the ILLC "Gazprom International Limited" Group Companies	Reg. No.	268
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Responsible Person A.Y. Kurashvili, Head of Contracts Division	Approval Date 16.07.2025		

1. General Provisions

- 1.1. The Gifts and Hospitality Policy of the International Limited Liability Company "Gazprom International Limited" Group Companies (hereinafter "the Policy") is a high-level fundamental document establishing requirements for giving and receiving Gifts and participation in business and other Events.
- 1.2. The Policy is formulated according to:
 - Good Practice Guidance on Internal Controls, Ethics and Compliance adopted by the OECD Council on February 18th, 2010;
 - ISO 19600:2014 Compliance management systems - Guidelines;
 - ISO 37001:2016 Anti-bribery management systems - Requirements with Guidance for Use;
 - Federal Law of 25.12.2008 No. 273-FZ "On Combating Corruption";
 - National law applicable to the Group Companies;
 - Internal regulations and policies governing gifts and hospitality issues.
- 1.3. The objectives of the Policy are:
 - to ensure compliance with the requirements of the applicable law of the country of operation and with the Code of Corporate Ethics in respect of giving and receiving Gifts and participation in business and other Events by the Group Companies employees;
 - to minimize the risk of conflict of interest when receiving or giving Gifts and participating in business and other Events;
 - to ensure the compliance of the Group Companies with the principles and norms of honest, fair and responsible business practices;
 - to implement in the Group Companies a uniform and efficient system of control of giving and receiving the Gifts and participation in business and other Events.
- 1.4. The Policy reflects the commitment of the management and employees of the Group Companies to the ethical standards of conducting a legitimate, open, and honest business, improving the corporate culture, adhering to the best corporate governance practices, and maintaining a good business reputation.
- 1.5. The tasks of the Policy are:
 - to inform the management, employees and business partners of the Group Companies on the aims and purpose of Gifts in the business practice and in the ordinary course of business of the Group Companies;
 - to prevent the illicit distribution and reception of Gifts, not allow the trading in influence, ensure that all the participants of the business practice understand which situations of giving and receiving Gifts, and participation in business and other Events, are acceptable and unacceptable;
 - to call on the employees of the Group Companies to take responsible and prudent approach to Gifts giving and reception, to act within the established limits and acceptable standards of conduct;
 - to ensure the conformity of internal normative documents regulating the legality issues of giving and receiving Gifts and participation in business and other Events.
- 1.6. This Policy applies to all ILLC "Gazprom International Limited" Group Companies.

2. Terms and Definitions

Public Official	Any person holding a legislative, administrative or judicial office, employed by/acting on behalf of an organization, agency that belongs to or is controlled by government, a political party, party official, candidate for a public office or an office in an international organization.
Group Company	ILLC "Gazprom International Limited" and/or its subsidiaries, partially or fully, directly or indirectly controlled by ILLC "Gazprom International Limited", and their separate structural units (branch offices, representative offices, and project management offices). For the purpose of this definition, "control" means direct or indirect ownership of more than fifty percent (50%) of total interest.

Event

Any social, sports or protocol event, standing buffet and other dining events, festive occasion, conference, marketing activity or other event.

Gift

Any tangible or intangible value with respect to which there is no obligation to pay a regular price, including money, securities, gift certificates, lottery tickets and other assets and property-related benefits or services (works, services, payments for entertainment, payments for recreation, travel costs, loans, discounts, granting assets, including residential properties, for use, donations, etc.), received in the context of employment in any of the Group Companies.

3. Competencies of the management bodies in Gifts and Hospitality

- 3.1. The General Director of ILLC "Gazprom International Limited" organizes and provides overall guidance to the Group Companies' activities regarding Gifts and Hospitality, reviews the reports of respective performers on a regular basis.
- 3.2. The managing directors of the Group Companies assign powers, duties and responsibilities within this Policy among the employees and/or structural units of the Group Companies, ensure the organization of activities aimed at the implementation of the principles and requirements of the Policy, including appointment of the persons responsible for development, implementation and control of the procedures related to Gifts and Hospitality.

4. Principles of building a system for risk management and internal controls in Gifts & Hospitality

- 4.1. The system for risk management and internal controls in Gifts & Hospitality is based on the following principles:
 - a) Compliance with applicable national law.
Related events must comply with the current national law applicable to each Group Company and other applicable regulations.
 - b) Tone at the top.
The Management of the Group Companies plays a pivotal role in building a Gifts & Hospitality Culture. It also provides reliable, explicit, and tangible support to programs and measures involving internal controls, ethics, and compliance aimed to prevent and trace acts of bribery.
 - c) Involvement of people.
Employees at the Group Companies must be aware of the provisions governing Gifts & Hospitality. Employees are actively involved in developing and deploying standards and procedures declared in the Policy.
 - d) Liability and inevitability of punishment.
Punishment must be inevitable for all employees, regardless of their position, seniority, and other conditions, who have violated the rules of giving or receiving Gifts and participating in business and other Events while performing their duties at work. Management is personally responsible for the implementation of the Policy.
 - e) Open business.
Gifts & Hospitality standards adopted by the Group Companies must be made known to counterparties, partners, and the public.
 - f) Ongoing supervision and regular monitoring.
Ethics and compliance programs and measures undergo regular improvements with a view to an evaluation and enhancement of their effectiveness in preventing and tracing acts of bribe-taking by employees with consideration to recent developments related thereto and the evolving international and industrial standards.

5. General requirements for Gifts

- 5.1. The Group Companies can encourage the giving and receiving of business-related Gifts only, which can be accepted in the conduct of business, are a traditional business practice, and serve to maintain relations with business partners, customers, and other third parties involved in the business of the Group Companies. The Group Companies issue mandatory guidelines as to the acceptable types and values of Gifts given and received, and create procedures for managing this type of activity.
- 5.2. Giving and accepting Gifts should be limited by the Group Company even when given or accepted in good faith, without manifesting any wrongful intentions. Such limitation serves to control any risk of reputational damage for the Group Companies in front of employees and other stakeholders, such as shareholders, counterparties, the government, government authorities, professional associations, securities market actors, etc.
- 5.3. This Policy assumes that gifts to the members of the family, relatives or significant others of an employee are considered as Gifts to the employee if they are provided in connection with the performance of his official duties.

- 5.4. The Group Companies must restrict the ability of receiving a Gift in accordance with the Code of Corporate Ethics and other internal regulations. Any unauthorized Gifts must be refused.
- 5.5. Gifts to Public Officials and employees of PJSC "Gazprom" group companies should be avoided, except for promotional materials associated with the Company's image or business. Gifts to Public Officials should be motivated and authorized in advance in writing by the head of the Group Company involved.

6. General requirements for Events

- 6.1. Inviting third parties or accepting invitations by Group Company employees to participate in a business-related Event and other Events is permitted if such Event meets the principles of the Anti-Corruption Policy and causes no potential damage to the reputation of any of the Group Companies.
- 6.2. Events must at all times correspond to the nature of the relation with persons for whom such Events are held, observe business courtesy or long-standing practices, and avoid frequency and excessiveness that question their appropriateness.
- 6.3. Providing business partners visiting events with accommodation or transportation, as well as payment for their guests or family members is not acceptable. It is acceptable only in cases where the provision of accommodation or transport will be included in the regulations of the event, as part of the welcome package for all invitees, without highlighting cost and class preferences to one or another business partner, and this must be agreed in advance in writing by the head of the Group Company involved.
- 6.4. Group Company employees are allowed to visit third-party sports, cultural, or other Events but such employees may not ask business partners or third parties for an invitation.
- 6.5. As a normal business courtesy, reasonable costs for lunch/dinner with business partners can be paid for. The Group Companies issue guidelines for what may be considered reasonable in individual situations.
- 6.6. Except for business related protocol Events, significant Events for the implementation of oil and gas agreements in which government agencies or companies participate, as well as related social or sports Events, participation of Public Officials and representatives of PJSC "Gazprom" group companies in the Events of the Group Companies should be avoided. Whenever deemed necessary, it should be authorized in advance in writing by the head of the Group Company involved.
- 6.7. Group Company employees may participate in Events organized by Public Officials; however, such participation must be preliminarily authorized by the General Director of the ILLC "Gazprom International Limited", as provided by the internal regulations of the Group Companies, and remain within the boundaries of an established practice, relations, social partnership, and business courtesy as well as any guidelines issued by the Group Companies.

7. Standards and procedure for their implementation

- 7.1. The Group Companies are governed by a Code of Corporate Ethics that uses Europe's and Russia's best corporate governance practices. The Code establishes the corporate values and defines the most important principles and rules of business conduct in the field of Gifts and Hospitality, based on these values. The permanent Corporate Ethics Commission is responsible for the work on implementation of the requirements and provisions of the Code of Corporate Ethics. The implementation of the business process within the framework of which specific rules for Gifts and Events are developed is entrusted to the structural unit responsible for protocol events.

8. Employee's responsibility for failure to comply with the requirements of the Policy

- 8.1. In the organization of the processes of risk management and internal controls in Gifts & Hospitality, the Group Companies are guided by the principle of inevitability of punishment for their employees for breaches committed regardless of their position.
- 8.2. Depending on the gravity of the offence, the liability can be disciplinary, administrative and criminal according to the applicable national law.
- 8.3. The respective Group Company in accordance with the procedure stipulated by the internal regulations should investigate each ascertained fact of breaches, within the limits allowed by the applicable national law.

9. Procedure for review and amendment

- 9.1. The amendments to the Policy are made in accordance with procedure established in the Group Companies in the following cases:
 - when it's necessary to bring the Policy provisions in line with the changes in the applicable law;
 - in order to improve the set of measures in the field of Gifts & Hospitality of the Group Companies.