

	Whistleblowing and Whistleblower Protection Policy of the ILLC "GAZPROM INTERNATIONAL LIMITED" Group Companies	<b>Reg. No.</b>	270
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<b>Drafted by</b> A.Y. Kurashvili, Head of Contracts Division	<b>Approval Date</b> 16.07.2025		

## 1. General Provisions

- 1.1. The Whistleblowing and Whistleblower Protection Policy of the International Limited Liability Company "Gazprom International Limited" Group Companies (the "Policy") is an underlying document that governs the disclosure of any unlawful, harmful, and fraudulent acts, as well as any unethical and inappropriate behaviors.
- 1.2. The Policy is based on:
  - Good Practice Guidance on Internal Controls, Ethics and Compliance adopted by the OECD Council on February 18th, 2010;
  - Directive (EU) 2019/1937 of the European Parliament and of the Council of 26 October 2019 on the protection of persons who report breaches of Union law.
  - National laws applicable to the Group Companies;
  - Company-wide policies and regulations on Ethics and Compliance.
- 1.3. The Policy seeks to:
  - ensure that the actions taken by Group Company employees to avert any unlawful, harmful, and fraudulent acts, as well as any unethical and inappropriate behaviors conform to the requirements of applicable law in the country of presence and the Corporate Ethics Code;
  - provide any standards necessary to protect Whistleblowers from retaliation for their reporting any wrongdoing;
  - ensure that the Group Companies comply with the principles and norms of bona-fide, fair, and responsible business practices;
  - create in the Group Companies a uniform, effective system to respond to any reports on any wrongdoings and to protect Whistleblowers.
- 1.4. The Policy reflects that the management and staff of the Group Companies is committed to the ethical standards of conducting a legitimate, open, and bona-fide business, enhancing corporate culture, adhering to the best practices of corporate governance, and upholding a proper business reputation.
- 1.5. The underlying principles regarding the implementation of the Policy include:
  - the compulsory disclosure of any unlawful, harmful, and fraudulent acts, as well as any unethical and inappropriate behaviors;
  - the confidentiality of reporting any wrongdoing;
  - protection of Whistleblowers from dismissal, demotion, and other forms of retaliation from individuals affected by such reports on wrongdoing.
- 1.6. This Policy applies to all the ILLC "Gazprom International Limited" Group Companies.

## 2. Terms and Definitions

<b>Whistleblower</b>	An employee or contractor of the Group Company, or a third party (including anonymous third parties), who, acting in good faith, discloses information on any suspicious incidents, including unethical and inappropriate behaviors or alleged wrongdoings as described by this Policy.
<b>Group Company</b>	ILLC "Gazprom International Limited" and/or its subsidiaries, partially or fully, directly or indirectly controlled by ILLC "Gazprom International Limited", and their separate divisions (branch, representative and project offices). For the purposes of this definition, "control" means holding, directly or indirectly, of more than 50% (fifty percent) of total interest.
<b>Retaliation</b>	The action or inaction (any decision) of the management of the Group Company, which negatively affects the working conditions of the employee, including salary, allowances, career advancement, workplace equipment, job responsibilities, benefits, trainings, vacations, etc.
<b>Wrongdoing</b>	Any breach of applicable law and the Corporate Ethics Code, other internal normative documents, as well as willful violation of the terms of the contracts concluded with the Group Company, misappropriation of money, actual or alleged fraud causing damage to property or reputation, posing of a threat to the health and safety of employees, abuse of office, etc.

### 3. Whistleblowing

- 3.1. Reportable wrongdoings, both actual and alleged, include:
  - any acts that run counter to the policies or other internal normative documents of the Group Companies and may pose a threat to the health and/or safety of people or cause harm to the environment;
  - any acts running counter to the business ethics codes in the Group Companies that may lead to a fraud, bribery, corruption, and money laundering or prejudice human rights;
  - any possible conflict of interest;
  - any unethical behavior or behavior undermining competition;
  - any failure to fulfill the obligations imposed by applicable law in the country of presence, internal normative documents, or contracts;
  - misuse of assets, *inter alia*, in accounting, internal audits of accounting, financial statements, and audits; and
  - other breaches of applicable law in the country of presence and the Corporate Ethics Code.
- 3.2. Any unethical or inappropriate behavior or alleged wrongdoing, if witnessed by an employee, must be immediately reported to the head of the unit where such an employee works or by calling the hotline or email. Wrongdoings by management, if any, should be reported to a competent officer at the Corporate Security Department according to the procedure described in a Group Company's internal normative documents.
- 3.3. Whistleblowers are fully protected — also legally if needed — and kept anonymous.
- 3.4. Employees are considered to act in good faith if they have valid reasons for reporting any suspicious incidents, including any unethical or inappropriate behaviors or alleged wrongdoings, as described in this Policy. Employees are not considered to act in good faith if they were aware that the reported information was false or unsubstantiated.

### 4. Whistleblowing and Consideration of Reports

- 4.1. The Group Companies confidentially receive information from Whistleblowers on any suspicious incidents including theft, bribery, fraud, or abuse of office in the Group Companies in accordance with the internal policies and procedures. The hotline and email address are posted on the enterprise portal and website of the Group Companies. Any incoming information is analyzed by competent officers at the Corporate Security Department of ILLC "Gazprom International Limited" to make a decision on whether further investigation is required. The Group Company takes all available measures to prevent unauthorized access to the content of messages sent via the hotline or e-mail.
- 4.2. A Whistleblower selects whether he/she reports the information anonymously or revealing his/her identity. If a Whistleblower reveals his/her identity, he/she is guaranteed an acknowledgment of receiving the report (transfer acknowledgment) within seven days after the report is received. In all circumstances, the management of the Group Company employing him/her will have no access to reported information. If a Whistleblower reveals his/her identity, these data will be only known to the authorized staff at the Corporate Security Department of ILLC "Gazprom International Limited" who conduct the investigation. Invariably, the Whistleblower is guaranteed confidentiality to the greatest extent possible.
- 4.3. If the Whistleblower sends his/her report to the manager of the unit where he/she works, this manager must immediately send this report to a competent officer at the Corporate Security Department as prescribed by the Group Company's internal normative documents.
- 4.4. The competent officer at the Corporate Security Department may request additional information on the Whistleblower and ensure a preliminary investigation is conducted in accordance with internal policies and procedures. If the information is validated, investigation findings must be reported to General Director of ILLC "Gazprom International Limited" to make an informed decision based on the investigation report and recommendations from services involved in the investigation taking into account the facts proven to be true.
- 4.5. It is guaranteed that non-anonymous Whistleblowers will be provided with a response on their reports within three (3) business days after receiving such report.
- 4.6. The Group Company should retain all reports using Integrity, Confidentiality, and Security. The personal data of a Whistleblower are processed as required by applicable personal data law governing, *inter alia*, the archiving and deletion of personal data that are expressly irrelevant to a particular case.
- 4.7. The Group Company should retain all relevant information for as long as may be needed for future investigations. Retained data should be anonymized and the existence of a Whistleblower's report should remain undisclosed for as long as needed.

## 5. Protection of Whistleblowers

- 5.1. This Policy guarantees that the Group Company and its employees will not apply or recommend to apply any retaliations against Whistleblower in response to a bona-fide disclosure of any unethical or inappropriate behaviors or alleged wrongdoing.
- 5.2. If an employee is exposed to any retaliations after he/she has disclosed an alleged wrongdoing, such an employee has the right to submit a written application directly to the Corporate Ethics Commission (the "Commission") attaching the proof of such misconduct discovered by the employee and information on the retaliations against him/her. This right also exists when the employee suffers a disadvantage perceived as retaliation, but not formally linked to reporting alleged wrongdoing.
- 5.3. If an employee appeals to the Commission to inform on the retaliations against him/her in connection with his/her disclosure of alleged misconduct, the Commission examines the received application and all attached files properly and in due time. In this regard, the Commission, depending on the circumstances, may assign a person or a commission responsible for a detailed investigation establishing the scope and timeframe thereof.
- 5.4. The responsible person or commission have the right to request any information/documentation and interview any employees or other individuals if they deem it necessary or in line with the investigation objectives hereunder. Following the completion of the investigation, a report must be prepared for consideration by the Commission.
- 5.5. After the investigation report is considered, the Commission determines the reason for the retaliations reported by the Whistleblower and may instruct to apply remedies for the protection of the Whistleblower, which may include but are not limited to the following:
  - reinstating the employee in the same or equivalent position;
  - compensating the employee for the lost salary, remuneration, or other reimbursements.
- 5.6. This Policy does not protect the employee from retaliations against him/her that are in strict compliance with applicable law, the policies and other internal normative documents of the Group Companies in connection with his/her low performance, violations of the code of conduct, or other legitimate reasons not associated with the disclosure of unethical or inappropriate behaviors or wrongdoings.
- 5.7. An employee knowingly providing false information on allegedly suspicious incidents, including unethical or inappropriate behaviors or alleged wrongdoings, may be subjected to a disciplinary action, up to and including dismissal, in accordance with applicable law and the policies and other internal normative documents of the Group Companies.

## 6. Enforcement of the Policy

- 6.1. This Policy constitutes an integral part and is considered in the context of the rules and principles set out in the other internal normative documents of the Group Companies regulating the ethics of business conduct.
- 6.2. The Group Companies are fully responsible for the enforcement of the principles hereof. Each Group Company has the right to introduce internal policies and procedures regulating the moral and ethical behavior of employees in accordance herewith unless they contradict the applicable law of the country of presence.
- 6.3. Please refer to the Electronic Document Management System for the internal normative documents of the Group Companies regulating the ethical conduct of employees.
- 6.4. Violation hereof will entail disciplinary actions including but not limited to dismissal in accordance with applicable law and the policies and internal normative documents of the Group Companies.
- 6.5. Comparable actions are applied against counterparties, managers, and officers of business partners and third parties engaged by a Group Company or providing services on behalf of a Group Company. A Group Company has the right to terminate the relation with such a person that has violated the provisions of this Policy and other anti-corruption policies.
- 6.6. The Legal Department together with Corporate Security Department of ILLC "Gazprom International Limited" provides necessary consultations on improving the procedure for whistleblowing and protecting Whistleblowers and submit them for consideration by the General Director of ILLC "Gazprom International Limited".

## 7. Revision and Amendment

- 7.1. The Policy is amended in accordance with the procedure established in the Group Companies when:
  - it is necessary to align the Policy with the changes in applicable law;
  - whistleblowing and Whistleblower protection have been improved in the Group Companies.