

Appendix
to Arctic LNG 2 Order
dated _____ No.

**ANTI-CORRUPTION POLICY
OF ARCTIC LNG 2**

INTRODUCTION

ARCTIC LNG 2 limited liability company ("the Company") is convinced that one of the most important prerequisites for a sustainable business development is strict compliance with the effective legislation governing anti-corruption issues.

The Company hereby declares that it strongly rejects dishonest and unlawful business practices and voluntarily assumes additional anti-corruption obligations recommended by Russian, foreign and international agencies and organizations.

This Anti-Corruption Policy (hereinafter, the Policy) serves to identify the Company's goals and objectives in countering any involvement in corrupt practices, defines the legal platform and key principles of such counteraction, describes the Company's measures to prevent corruption, and sets forth the responsibilities of the Company's employees and other persons with regard to countering corruption and the liability for a breach (improper fulfillment) of the Policy's provisions (non-compliance).

1. GENERAL PROVISIONS

1.1. Purposes of the Policy

The Policy has been developed to:

- ensure compliance with Russian and international anti-corruption laws and regulations and high standards of business ethics;
- minimize the risks that the Company and its employees may be involved in corruption;
- consistently promote the image of Company renouncing corruption in all forms and manifestations among the Company's employees, subsidiaries and affiliates, participants, investors, counterparties, representatives of governmental and municipal authorities and other stakeholders;
- create a local regulatory framework governing the Company's efforts and activity to prevent any involvement in corruption.

1.2. Objectives of the Policy

The objectives of this Policy are to:

- Introduce anti-corruption procedures to the Company based on applicable anti-corruption laws and regulations and communicate such procedures to the Company's employees and other stakeholders;
- Obligate the Company's employees to comply with the principles, restrictions and requirements set out in the Policy;
- Establish communication channels for information about factual corruption;
- Explain and clarify the anti-corruption measures adopted by the Company.

1.3. Scope

The provisions of this Policy are binding on all of the Company's employees.

The requirements of the Policy become obligatory for the subsidiaries and affiliates of Arctic LNG 2 once they are put into effect in accordance with the procedure established by charters of such companies.

The Company's contractors shall comply with the requirements of this Policy and shall procure that all of their employees comply with the requirements of this Policy, if the compliance obligation is agreed in the contracts between them and the Company.

1.4. Term of the Policy and Amendments to the Policy

The Policy is a permanent bylaw.

The Policy has been approved and brought into force by the Company order.

The Company will assess the Policy for compliance with applicable laws and regulations on a regular basis with a frequency of at least once every two years.

The provisions of this Policy may be amended as is necessary to take account of any changes in business practices and its scope of application. The amendment procedure will be the same as the procedure for adopting the Policy.

1.5. Units in charge

The Company's stand-alone business units responsible for the implementation of the Policy provisions in the Company will be identified in the relevant Company order.

The Deputy General Director for Business Support will take measures to keep the Policy up to date.

The Company's General Director will oversee compliance with the requirements of this Policy.

2. LEGAL AND PROCEDURAL FRAMEWORK

The Policy was put together with due regard to the requirements of the following regulations:

2.1. International and foreign legislation

In the context of this Policy, international anti-corruption law includes the following:

- The United Nations Convention against Corruption (adopted on October 31, 2003; ratified by the Russian Federation on March 6, 2006);
- The Council of Europe Criminal Law Convention on Corruption (adopted on January 27, 1999; ratified by the Russian Federation on July 25, 2006);
- The Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (adopted on November 21, 1997; the Russian Federation signed on to it on February 1, 2012).

Foreign anti-corruption legislation in the context of the Policy refers to the UK Bribery Act (adopted on April 8, 2010, entered into force on July 1, 2011).

The main requirements of the above statutes applicable to businesses include the following:

- prohibition on offering bribes and items of value;
- prohibition on bribing foreign public officials;
- prohibition on accepting bribes and other items of value.

2.2. Russian law

The Russian anti-corruption laws and regulations include the following:

- Federal Law No. 273-FZ of December 25, 2008 titled “Combating Corruption”;
- Statute No. 63-FZ of June 13, 1996, the Criminal Code of the Russian Federation;
- Statute No. 195-FZ of December 30, 2001, the Code of Administrative Offenses of the Russian Federation.

Subject to the Russian law, criminal and administrative liability is stipulated for the following corrupt practices:

- directly giving a bribe;
- accepting a bribe;
- promising or offering mediation in bribery;
- petty bribery;
- being an intermediary for bribery;
- abuse of power;
- fraud committed while abusing one’s official capacity;

- misappropriation or embezzlement committed while abusing one’s official capacity;
- corrupt business practices;
- mediation in commercial bribery;
- promising or offering mediation in commercial bribery;
- petty commercial bribery;
- unlawful remuneration while acting on behalf of a legal person.

2.3. Procedural framework

The Policy was prepared with due regard to the recommendations of Russian and international authorities and organizations involved in combating corruption:

- Ministry of Labour and Social Protection of the Russian Federation, Guidelines for the Formulation and Deployment by Organizations of Measures to Prevent and Combat Corruption (published on November 8, 2013; approved during the Russian Federation Presidential Council Presidium’s meeting on Combating Corruption on April 8, 2014);
- Recommendations made by the UK Ministry of Justice on procedures for companies to implement with the view to preventing bribery (published on March 30, 2011);
- International Chamber of Commerce Rules on Combating Corruption (as amended in 2011).

3. TERMS AND DEFINITIONS

3.1. The Policy contains the following terms and definitions thereof:

3.1.1. **Anti-corruption provision** – an appendix to a Company agreement or contract, or a section thereof, whereunder the parties thereto shall agree to zero tolerance of any corrupt practices during the fulfillment of their mutual obligations, and determines the consequences of a breach of this agreement;

3.1.2. **Bribe giving** is the process of giving a bribe to a Russian official, foreign official, or an international civic organization official, either in person or through an intermediary (Article 291, RFCC);

3.1.3. **Due diligence** is a principle based on the concepts of reasonableness and good faith, stipulating that any business operations will be carried out, or management decisions made, relying on information that is sufficient to shape a reasonable opinion regarding any evidence of dishonesty on the part of a contractor or applicant for the job;

3.1.4. **Prohibition on offering bribes (and items of value)** is prohibition on the giving, offering, or promising of any benefit, be it tangible or intangible property, personally or through an intermediary, while seeking to influence another person’s decision to one’s own advantage or to the advantage of any third parties or organizations.

3.1.5. **prohibition on bribing foreign public officials;** a prohibition on the giving, offering, or promising of any benefit, be it tangible or intangible property, personally or through an intermediary, to foreign public officials while seeking to influence the performance of their official duties to the benefit of a private organization;

3.1.6. **prohibition on accepting bribes (and other items of value)** is a prohibition on accepting the offer of any benefit, be it tangible or intangible property, personally or through an intermediary, promised in return for any action or inaction related to one's job duties, in exchange for an advantage given to the briber or third parties;

3.1.7. **abuse of power** is the use by someone in a decision-making role in a commercial company or other organization of his/her authority in a way that runs contrary to the legitimate interests of that organization, either with the intent to acquire personal benefits or advantages, acquire benefits for other people or do harm to other people, provided that such an offense results in significantly compromising the rights and lawful interests of individuals or the legally protected interests of the public or country at large (Article 201 of the Criminal Code of the Russian Federation);

3.1.8. **corrupt business practice** is the unlawful transferal to a person in a decision-making role in a commercial or other organization of cash, securities, or other property, providing services of material value to such a person, or the conferral of other proprietary rights in return for action or inaction leading to the benefit of the giver using the person's official capacity; the unlawful acceptance by a person in a decision-making role in a commercial or other organization of cash, securities, or other property, as well as the unlawful enjoyment of services of material value or other proprietary rights in return for action or inaction leading to the benefit of the giver using the person's official capacity (Article 204 of the Criminal Code of the Russian Federation);

3.1.9. **conflict of interest** is a situation where the personal interest (direct or indirect) of a Company's employee (or those of a Company's subsidiary or affiliate) has or may have an effect on the due performance by that employee of their duties, and where the employee's personal interest comes or may come into conflict with the rights and lawful interests of the Company, thereby resulting in prejudice to the rights and lawful interests of other individuals, the Company, other organizations, or the public or country at large;

3.1.10. **corruption, corruption crimes** mean abusing one's official capacity, giving bribes, promise, offering, or accepting an offered bribe (object of value), abusing one's authority, commercial bribery, or the other unlawful use by a natural person of his/her official capacity in a way that runs contrary to the lawful interests of the public and country at large, with an intent to acquire a benefit, be it tangible or intangible property, for themselves or for third parties, or the unlawful conferral of proprietary rights to such person by other natural persons; doing any of the above for or on behalf of a legal person;

3.1.11. **employee's personal interest** is an employee's interest that involves the opportunity to acquire, while discharging his/her official duties, profit in the form of cash, valuables, other property, services of material value, or the conferral of other proprietary rights for themselves or third parties;

3.1.12. **petty bribery** is taking or giving a bribe directly or through intermediaries in an amount not exceeding ten thousand rubles (Art. 291.2 of the Russian Criminal Code);

3.1.13. **petty commercial bribery** is a commercial bribery in an amount not exceeding ten thousand rubles (Art. 204.2 of the Russian Criminal Code);

3.1.14. **fraud committed while abusing one's official capacity** is the theft of someone else's property, or the acquisition of rights to someone else's property, through deceit or a breach of trust committed while abusing one's official capacity (Art. 159 of the Criminal Code of the Russian Federation);

3.1.15. **unlawful remuneration while acting on behalf of a legal person** – while acting on behalf of or in the interests of a legal person, engaging in the unlawful transfer, offering, or promise to a Russian official, foreign official, international civic organization official, or someone in a decision-making role in a commercial or other organization of cash, securities, or other material property, or the provision of services of material value to such a person, or the conferral of other proprietary rights in return for action or inaction by a Russian official, foreign official, international civic organization official, or someone in a decision-making role in commercial or other organization a) which is in the interest of the legal person that is using such a person's official capacity (Article 19.28 of the Code of Administrative Offenses of the Russian Federation);

3.1.16. **promise or offer to pass or accept unlawful remuneration** is deliberate efforts to make ready for the commission of a corruption offense, when the expressed intention of the person to pass or receive a bribe or items of value was aimed at bringing it to the attention of other persons in order to give them, or receive from them items of value, as well as in case of agreement between the above mentioned persons;

3.1.17. **taking a bribe** is receiving a bribe by an official, a foreign official or an official of a public international organization personally or by an intermediary (Art. 290 of the Russian Criminal Code);

3.1.18. **being an intermediary for bribery** means the direct transfer of a bribe on instructions from a bribe giver or bribe taker, or any other assistance to the bribe giver and/or bribe taker in reaching or implementing an agreement between them relating to taking or giving a large-scale bribe (₽25,000 and upwards), as well as a promising or offering to mediate in bribery-related negotiations (Article 291.1 of the Criminal Code of the Russian Federation);

3.1.19. **misappropriation or embezzlement** means the theft of someone else's property entrusted to a person that has been committed by such a person taking advantage of his/her official capacity (Art. 160 of the Criminal Code of the Russian Federation);

3.1.20. **employees** are natural persons who have employment relations with the Company;

3.1.21. **executives** are Company's employees with the official rank of "executive officer".

4. KEY PRINCIPLES

4.1. Legitimacy

The Company carries out its activities in strict compliance with the applicable Russian anti-corruption laws.

4.2. Zero tolerance of corruption in any form or manifestation

The Company declares zero tolerance of corruption in any form or manifestation, and prohibits employees, members of the Company's management board, or other people acting for or on behalf of the Company, whether directly or indirectly, from taking part in any corrupt practices personally or through intermediaries, including offering, promising, giving, requesting, or taking bribes (items of value) or making any kind of payments that facilitate the simplification of administrative, bureaucratic or other formalities in any way, shape or form, including those made in the form of cash, valuables, services of material value or other benefits, be it tangible or intangible property, to and/or from any people or organizations, including for-profit and non-profit organizations, federal or local government authorities, any public officials, including foreign officials, and made with the intent to acquire benefits for themselves, the Company, or third parties.

4.3. Management leading by example

The Company management should instill an ethical standard of zero tolerance for corruption at all levels by setting an example through their personal behavior.

4.4. Business transparency

Seeking to enable the Company's employees and other persons to express concern, on a confidential basis, about potentially corrupt practices by other employees, the Company has set up a special Security Hotline to receive such statements from employees, as well as suggestions on improving the procedures and mechanisms for preventing corruption.

4.5. Periodic risk assessment

The Company, using all information available to it, will regularly identify, analyze, and assess potential external and internal corruption-related risks typically encountered during its operations, both general ones and those for specific areas of responsibility.

4.6. Efficient and commensurate anti-corruption procedures

The Company will formulate and introduce into its operations a set of relevant and efficient corruption prevention procedures commensurate with risks that are identified, and monitor compliance with such procedures.

4.7. Due diligence

Seeking to minimize the risk of involvement in corrupt practices, the Company will carry out a comprehensive evaluation of its contractors to determine, among other

things, their integrity, the existence of internal anti-corruption procedures, and the absence of any conflict of interest. Also, the Company will welcome its contractors' commitment to the principles defined in this Policy, their willingness to include anti-corruption provisions in their contracts, and their offers to assist during any investigation of non-compliance with mutual agreements.

The Company will apply some components taken from the comprehensive evaluation to the recruitment of new staff and human resources management in general.

4.8. Employee involvement in combating corruption

The Company's objective is to shape among its employees a personal attitude of zero tolerance towards corruption in any way, shape, or form.

To accomplish this, the Company will take every possible step to implement the Policy at all organizational levels and communicate the Policy to all of the Company's employees and other stakeholders.

The Company will continually try to raise the level of anti-corruption culture among its employees through regular trainings in the basic Policy requirements and their practical application.

4.9. Monitoring and supervision

The Company will regularly monitor, oversee and assess introduced anti-corruption procedures, as well as revise and update them as may be required.

4.10. Protection from retaliatory action and penalties

The Company will protect the interests of its employees who voluntarily report, including on an anonymous basis, on known incidents of theft, embezzlement, fraud, bribery, corrupt business practices, as well as on any conflict of interest or other offenses within the Company, as well as the interests of those who refuse to commit such offenses or to take part in them as intermediaries.

No disciplinary action may be taken against such employees for the aforementioned reasons.

5. CORRUPTION PREVENTION MEASURES

5.1. Restrictions on offering/receiving gifts and paying entertainment expenses

The Company recognizes that the exchange of corporate gifts and reasonable payments for the purposes of business hospitality are an integral part of conducting business and constitute a common business practice.

At the same time, such practices pose certain corruption-related risks, since giving expensive gifts and paying overly high entertainment expenses may give rise to well-founded suspicions that the Company is pursuing ulterior motives.

Adhering to the principles of legitimacy and transparency in business, the Company imposes the following requirements on its employees that apply to receiving, offering, and exchanging gifts and paying entertainment expenses (transactions):

- full compliance with the requirements of Russian anti-corruption laws and regulations and applicable laws of any country where a transaction takes place, as well as abidance by the provisions of the Arctic LNG 2 Code of Business Ethics, any other Company bylaws and executive orders to be applied at the local level;
- prohibition of the above transactions with the intent to directly or indirectly influence the decisions of people acting in the capacity of local, regional, or federal government officials, Bank of Russia officials, representatives from political parties, contractors, civic organizations, or other parties in order to benefit the Company;
- the cost of gifts to people acting in the capacity of local, regional, or federation government officials, or Bank of Russia officials, shall not exceed ₺3,000 (three thousand rubles), and such gifts shall not be offered for the performance of official duties by these people;
- the cost of any gift that is being received or offered (except as indicated in the previous paragraph) shall not exceed ₺10,000 (ten thousand rubles);
- offering or receiving gifts in the form of cash, bank money transfers, securities, or their equivalents is prohibited.

If an employee has any doubt regarding the legitimacy of his/her actions when performing certain transactions, he/she should approach his/her line manager or the officer responsible for supervising observance of the Policy to resolve the issue.

5.2. Restrictions on charity and sponsorship

Being a community-oriented organization, the Company sees involvement in charity and sponsorship as a key element of its operations.

At the same time, the Company does not provide charity support or sponsorship to government and municipal authorities, for-profit and non-profit organizations, their representatives or any other parties with a direct or indirect intent to acquire benefits for the Company, its subsidiaries or affiliates, if such support may be objectively perceived as intended for the receipt of ulterior benefit.

5.3. Non-participation in politics

The Company does not participate, whether directly or indirectly, in any political parties, organizations or foundations related to political parties, and does not make any sponsorship or other payments in support of such parties.

The Company's employees may participate in political affairs at their discretion and in their free time, in the capacity of free individuals, unless this participation infringes on the interests of the Company and leads to a conflict of interest.

5.4. Due engagement with representatives of the government and civic organizations

The Company will liaison with law enforcement authorities, regulatory agencies, and other local, regional, and federal government agencies, their authorized representative, and with civic organizations and their representatives, strictly as defined within the limits of applicable laws and regulations.

The Company will not make illegal payments to the above agencies, organizations, their representatives, or other parties, including through intermediaries,

including payments for recreation, entertainment, transportation, and other expenses, with the intent to obtain or retain any business advantages.

5.5. Due interaction with contractors and agents; payments to third parties

The Company seeks to build business relations with contractors that support the principles of this Policy and have their own effective anti-corruption arrangements in place.

When entering into independent contractor agreements, the Company shall communicate the requirements of this Policy to its contractors and propose incorporating an anti-corruption clause (written to the form included as Attachment 1 to this Policy) into such agreements and contracts, which stipulates additional anti-corruption obligations and the consequences for engaging in corrupt practices by either party during performance of the contract.

The Company refrains from giving financial incentives to contractor representatives, through providing services, paying money or offering gifts with the intent to influence such representatives' decisions to benefit the Company.

The Company's employees are prohibited from involving any intermediaries, agents or other persons in any transactions that run counter to the requirements of applicable laws and regulations, this Policy and other Company bylaws.

5.6. Good-faith reporting

The Company strictly abides by legal requirements and regulations that govern the making and submission of reports. Every business-related activity that is executed will be documented in primary reporting documents. Distortion or falsification of data in accounting, management, and other types of reports and supporting documents is not allowed.

All financial transactions will be reflected in reporting documents consistently, carefully, and at an appropriate level of detail.

Employees who shall keep records as part of their duties are responsible for the preparation and submission of reports that are complete and made on time and in good faith.

Intentional distortion or falsification of reports is not permissible and is punishable by law.

5.7. Avoidance of conflicts of interest

The Company is taking steps to avoid the occurrence of any conflicts of interest with the intent to rule out the possibility of acquiring, whether in person or through an intermediary, any financial and/or personal benefits resulting from the fact that the Company's employees or their close relatives (parents, spouses, children, siblings, as well as the parents, siblings, and children of spouses and their children's spouses), enjoy rights that enable the acquisition of such financial/personal benefits through the official capacity of such relatives.

Legal relations involving any conflict of interest shall be governed by applicable Company bylaws and regulatory documents.

5.8. Inspections and audits

The Company conducts internal and external audits of its financial and business operations and monitors how its employees comply with the provisions of applicable anti-corruption laws and regulations, this Policy and other Company bylaws on a regular basis.

5.9. Security Hotline

Seeking to maintain a high level of trust in the Company, ensure compliance with international standards of business ethics and prevent and stem fraud and corruption, the Company has set up the Security Hotline.

Using the Security Hotline, any Company employee, contractor, shareholder, investor, or other party may report, in a convenient format, including on anonymous basis, about any known facts of theft and squandering in the Company, as well as fraud, bribery, corrupt business practices, conflict of interest and other manifestations of corruption and instances of breach of this Policy.

Each such report will be thoroughly reviewed, and the results of such review will be communicated to the Company executives, and an audit will be conducted if there are reasonable grounds for it.

The Security Hotline contact details will be published on the official website of the Company, corporate site on the intranet, information boards and in other public places.

5.10. Designation of structural units or company officials responsible for the prevention of corruption offenses

Seeking to effectively implement the provisions of the Policy, the Company will identify the structural units and make some of its officials responsible for the prevention of corruption offenses.

This decision will be documented in a separate administrative order of the Company.

6. OBLIGATIONS OF EMPLOYEES AND OTHER PERSONS TO COMBAT CORRUPTION

6.1. The Company's employees shall be familiarized with the Policy and shall sign a commitment to abide by its rules. The commitment will be documented as an attachment to the employment contract in the format provided in Attachment 2 to the Policy.

6.2. An employee's compliance with the Policy will be taken into account during evaluation of his/her performance, including the instances where he/she is promoted to a higher position and where other human resources and employment matters are resolved.

6.3. Employees of the Company will strictly abide by the restrictions and requirements provided by the Policy, including those concerning the offering and receiving of gifts; representation expenses, charity and sponsorship; participation in

political affairs; interface with public authorities and non-governmental organizations, contractors, intermediaries and third parties; avoidance of conflict of interest; and reporting.

6.4. Employees are prohibited from engaging in corrupt practices such as offering, promising, giving, requesting and taking bribes (subjects of corrupt business practices) or make payments for simplification of administrative, bureaucratic and other formalities in any way, shape or form, including in the form of cash, valuables, services or other benefits, whether or not represented by property, to any persons and from any persons or organizations, to include profit and non-profit organizations, government or local authorities, public officials, including foreign officials, with intent to acquire benefits for themselves, the Company or third parties.

6.5. The Company's employees shall abide by the Anti-corruption requirements and restrictions stipulated by other Company bylaws and regulatory documents (insofar as they are not at variance with the Policy).

7. LIABILITY FOR NONCOMPLIANCE (IMPROPER COMPLIANCE) WITH THE POLICY

7.1 All of the Company's employees, irrespective of what positions they hold, shall be personally liable for noncompliance (improper compliance) with this Policy.

7.2 The managers of the Company's stand-alone business units will be held liable in case their subordinates fail to abide by the Policy.

7.3 If there is any suspicion of an act of corruption having occurred, an internal investigation will be conducted with subsequent reporting of its findings to the Company management.

7.4 The Company may take disciplinary action against the person who has breached any provisions of the Policy, and the severity of the action will depend on the culpability, nature and degree of danger of the offense, amount of actual or potential damage caused to the Company, including harm to business reputation, and other essential circumstances.

7.5 The Company reserves the right to go to court with a civil law claim against the person who has breached any provisions of the Policy, in the event that any harm is done to the Company.

7.6 The Company reserves the right to report to law enforcement authorities with a statement requesting administrative or criminal prosecution of the person at fault in the instances where actions of such person show evidence of an administrative offense or a criminal offense.

7.7 The Company's employees may face criminal liability for a breach of Anti-corruption laws and regulations on the initiative of law enforcement agencies or regulators.

7.8 With a decision of the Company's management the information about non-compliances with the Policy may be made publicly available (provided that the personal data protection legislation is respected).

ANTI-CORRUPTION CLAUSE

1. Compliance with anti-corruption requirements

1.1. The Company (Arctic LNG 2) informs the other party hereto about the principles and requirements of Arctic LNG 2 Anti-corruption Policy (hereinafter the "Policy"). By entering into the Contract, the other Party confirms that it is aware of such Policy.

While performing their obligations hereunder, the Parties shall comply with, and ensure that their employees comply with, the Russian anti-corruption legislation requirements and shall not commit any corruption offences stipulated by international and foreign anti-corruption acts and laws applicable for the purposes hereof.

For the purpose of this Contract, corruption-related offences shall include direct and/or indirect, committed either personally or through intermediaries, offer, promise, receipt/giving of a bribe, corrupt business practices, provision/receipt of benefits in the form of money, valuables, or other property or property-related services, other property rights, non-property benefits by and from any persons, including representatives of government and municipal authorities, commercial and non-commercial organizations, foreign officials, agencies, and organizations with an aim to influence their decisions, actions/omissions, to receive or retain any unlawful advantage or other unlawful goals for oneself, the business, or third parties (hereinafter, the "Corruption-Related Offences").

1.2. Should either Party entertain a reasonable belief that a Corruption-Related Offense has been or may be committed (upon receipt of information about criminal proceedings initiated against an employee(s) of the other Party in connection with a corruption-related crime or other reliable information about such Corruption-Related Offense), said Party shall notify the other Party in writing accordingly, stating the relevant facts (hereinafter, the "Notice"), and may suspend the performance of its obligations under the Contract until receipt from the other Party of a confirmation that the Corruption-Related Offense has not or cannot be committed. The other Party shall provide the confirmation within 10 (ten) business days from the date of receipt of the Notice.

In the event that the Company receives reliable information that a Corruption Offense has been committed, the Company may, subject to the provisions of this Article, unilaterally withdraw from the Contract either in whole or in part by sending a written notification to the other Party and claim compensation for any losses that the Company may incur owing to the termination of the Contract.

Appendix No. 2
to Anti-corruption Policy of
Of Arctic LNG 2

Attachment
to Employment Contract with the
Arctic LNG 2 employees

**Commitment
to comply with the Anti-Corruption Policy of the ARCTIC LNG 2**

1. The Employee confirms that he/she is familiar with the Arctic LNG 2 Anti-Corruption Policy and the Arctic LNG 2 Code of Business Ethics and shall comply therewith.

2. The Employee shall:

2.1. Not engage in corrupt activities directly or indirectly, personally or through third parties, including an obligation not to offer, give, promise, ask or take bribes and payments to simplify formalities in any form, including cash, valuables, services or other benefits, to any persons and from any persons or organizations, including commercial organizations, authorities and local administrations, Russian and foreign government officials, private companies and their representatives.

2.2. Refrain from behavior that may be interpreted by others as a willingness to commit or participate in a corruption offense in the interests or on behalf of the Company.

2.3. Inform Supervisor and the officer accountable for monitoring compliance with the Policy about:

any cases when the Employee was induced to commit corruption offenses;
information on corruption offenses committed by other employees, counterparties of the Company, or other persons, that the Employee learns about;
the possibility of a conflict of interests or an actual conflict of interests involving the Employee.

3. The Employee is aware that he/she can report (including anonymously) to the Company's Security Hotline, their line manager or officer accountable for monitoring compliance with the Policy on any suspicions regarding the legitimacy and ethical feasibility of their actions, inaction or offerings of other employees, contractors or other persons interacting with the Company."

4. It was made clear to the Employee that no employee of the Company, including himself, will be subject to sanctions if he reports an alleged act of corruption, or if he refuses to give or receive a bribe, commercial bribery, or to mediate bribery in any other way, including if such a refusal leads to lost profit or failure to receive commercial and competitive advantages on the part of the Company.

5. The Employee has been warned about possible initiation of disciplinary, administrative, civil and/or criminal proceedings against him for violation of the anti-

corruption requirements of the Russian and other applicable laws, as well as the Anti-Corruption Policy and the Code of Business Ethics of LLC Arctic LNG 2.

6. It has been explained to the Employee that whenever he/she has additional questions about the principles and requirements of the Arctic LNG 2 Anti-Corruption Policy and applicable anti-corruption legislation he/she may contact his/her immediate supervisor or the officer accountable for monitoring compliance with the Policy.

« _____ » _____ 20 _____

(signature) / _____
(Full Name)