

APPROVED

03.01.2018

*Approved  
Skolnitsky  
03.01.2018*

## SANCTIONS POLICY

«On identification, assessment and exclusion of risk related to sanctions»

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### 1. Information card

<b>1.1 Effective date of the document</b>	03.01.2018
<b>1.2 Expiration date of the document</b>	31.12.2025
<b>1.3 Information about the document replaced by this document</b>	
Primary document	

### 2. General terms

<b>Business process / area of business</b>	Risk management
<b>Purpose of this document</b>	Present Policy forms part of the Company's sanctions compliance program and is introduced in order to exclude violation of sanctions legislation and restrictive measures either expressed or implied, resulting from negligence or accident.
<b>Scope</b>	Present Policy is permanent and applies to all transactions and relationships of the Company. The Policy is binding on all employees of the Company.
<b>Person responsible for controlling</b>	Sergey Kalnitsky (managing partner) and Yana Sergeevna Butakova under the Service Agreement from 27.12.2017
<b>Person responsible for alteration</b>	Yana Sergeevna Butakova

### 3. Terms and definitions

Term	Definition of terms
<b>Counterparty</b>	A legal entity in Russian or other jurisdiction (including credit institutions) with which the Company enters or intends to enter into business relations in the framework of their activities
<b>Controllers</b>	Companies identified on the sanction lists (SDN and SSI) which jointly or separately, directly or indirectly, hold 50 percent or more of the equity in the Company's counterparty
<b>Employee of the Company</b>	Employee or independent contractor
<b>Certificate of representations</b>	The Certificate containing the checklist for identification of sanctions-related risks and the Counterparty's representations (Appendix 1 to this Policy)
<b>Person in charge</b>	An employee of the Company or a person / organization hired on the basis of a service agreement for the purpose of exercising effective control over the implementation of this Policy. As of the date this Policy is approved, the Person in charge is Yana Sergeevna Butakova according to the Service Agreement from 27.12.2017
<b>Goods</b>	Oil equipment and other goods of the Company

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<b>Sanctions</b>	Embargoes, moratoriums, trade, economic, social, political restrictive measures (including those that make it impossible to make settlements in a certain currency) that are not trade policy measures usually used to regulate trade flows (import and export duties, anti-dumping, countervailing, special safeguard measures, import licensing, tariff quotas and other quantitative restrictions on imports and exports, measures of technical regulation and other tariff and non-tariff measures) imposed for political purposes by the United States of America, the European Union, member states of the European Union, the Russian Federation, the United Nations (UN), an authorized government agency or institution of any of the above states (including but not limited to the Office of Foreign Assets Control (OFAC) of the US Treasury, US Department of State, US Department of Commerce, Her Majesty's Treasury), an authorized body of another state, an authorized body of another international organization.
<b>Sanctions risk</b>	Negative effects that may arise in case of sanctions extension and / or administrative or criminal prosecution of the Company, controllers and / or controlled entities as well as members of the corporate body
<b>Sanctions list</b>	Means one of the following: <ul style="list-style-type: none"> <li>- the OFAC list of Specially Designated Nationals and Blocked Persons (SDN);</li> <li>- the OFAC list of the Sectoral Sanctions Identifications list (SSI);</li> <li>- the OFAC List of Foreign Sanctions Evaders (FSE);</li> <li>- the Consolidated List of Persons, Groups and Entities Subject to EU Financial Sanctions;</li> <li>- the Consolidated List of Financial Sanctions Targets maintained by the UK Treasury as a specially designated national or blocked person;</li> <li>- the U.S. Entity List</li> <li>- the U.S. Denied Persons List, or another list of persons subject to restrictions on export from the U.S.;</li> <li>- the Swiss Confederation list of persons, enterprises and organizations subject to sanctions;</li> <li>- any other list associated with sanctions.</li> </ul>
<b>SDN</b>	List of specially designated nationals and blocked persons subject to US / EU/ UK sanctions
<b>SSI</b>	List of persons subject to US / EU / UK sectoral sanctions

#### 4. Acronyms and abbreviations

Acronym / abbreviation	Expansion
<b>MP</b>	Managing partner
<b>EU</b>	The European Union
<b>Company</b>	"Square Meter" Property & Investments LLP
<b>UN</b>	United Nations
<b>Russia</b>	The Russian Federation

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<b>US</b>	The United States of America
<b>UK</b>	The United Kingdom
<b>API</b>	American Petroleum Institute / Американский институт нефти

## 5. General provision

5.1. The Company is a limited liability partnership, registered in accordance with the legislation of the United Kingdom. The Company is one of medium-sized businesses operating in the market of oil equipment and has a well-developed network of counterparties and a vast geographic delivery area. In view of this, the possibility that the Company at some point in time in course of its activities may unintentionally form business relations with a counterparty or in respect of which activities / place or method of activity have been imposed sanctions cannot be ruled out. These sanctions against the Company's counterparties may adversely affect the business relationship and reputation of the Company and cause inadvertent violation of the sanctions legislation.

Based on the aforesaid, the Company, acting in a reasonable manner and in good faith, is obliged to take actions to prevent potential violation of sanctions prohibitions and restrictive measures. In order to ensure the implementation of a mechanism for managing sanctions risks, the Company has developed and adopted this Policy.

5.2 The employees of the Company in relations with all counterparties and business partners should strive to bring to their attention the existence of this Policy and the rules and principles set forth in it.

5.3 The Policy defines the Company's approach to sanctions in the broadest sense. However, this Policy mainly refers to the sanctions imposed by the EU, the US, the UK and is not intended to take into account all the sanctions that have already been imposed or may ever be imposed by other states or international organizations in relation to economic activities, including those related to Russia. This policy shall be reviewed and accordingly adjusted if the company at some point faces risk that sanctions prohibitions imposed by other states (apart from the EU, US or UK) may affect the interests of the Company.

5.4 This policy, in particular:

- determines rules, principles and measures, aimed at identifying by the Company sanctions risks, their analysis and elimination of all factors related to breach of sanctions legislation;

- explains to employees, counterparties, business partners the meaning of sanctions, their content and the basic principles of their analysis;

- establishes main duties and responsibilities of employees, Company's corporate body involved in identifying, analyzing and developing solutions to reduce the negative impact of sanctions on the activities of the Company and its counterparties, as well as to eliminate all factors related to breach of sanctions legislation;

- clarifies the ethical principles of corporate behavior of the Company's employees in the light of the main principles and content of sanctions set forth in this Policy.

## 6. Background and value of sanctions

6.1 Sanctions are an instrument available to states, international organizations (such as the UN) and integration associations (such as the EU) to focus pressure on certain countries, companies and individuals in order to change the policies when it is impossible to achieve this goal by diplomatic means. Sanctions could have an impact on various economic activities of persons under the jurisdiction of the state subject to sanctions.

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6.2 Sanctions may impose certain restrictions and prohibitions on the movement of goods, services and funds, including (but not limited to):

- blocking of funds and economic resources of certain individuals or legal entities;
- restrictions on access to territories of states, imposing sanctions for certain individuals;
- prohibition on import into the EU and the USA of goods originating in the Republic of Crimea or the city of Sevastopol;
- prohibition on direct or indirect sales, supply, movement or export (re-export) of dual-use goods and technologies, if such goods or technologies can be used for military purposes;
- prohibition on direct or indirect sales, supplies, movement or export (re-export) of goods, works and services (except for financial services) or technologies to persons operating in the energy sector of the Russian Federation;
- restrictions (i.e. the need to obtain prior permission) on the direct or indirect sale, supply, movement or export of technology in the oil industry;
- prohibition on provision of direct or indirect technical assistance, brokerage services, financing or financial assistance;
- prohibition on provision of access to capital markets or assistance related to such access to certain financial institutions.

## **7. General principles of the Company's activities in connection with sanctions**

7.1 The company undertakes to interact with its counterparties in accordance with the rules and principles set in this Policy.

7.2 The Company expresses its intention to monitor sanctions that have potential impact on the activities of the Company and / or its counterparties.

7.3 Acquaintance with this Policy and understanding their role in managing sanctions risks is the responsibility of every employee of the Company.

7.4 Prior entering into any commercial relationship or entering into any commercial transactions with counterparties, employees of the Company should ensure that such relationships or transactions do not entail any risks associated with sanctions. In any case, if in such commercial relations or transactions, in the opinion of the employee of the Company, are involved or may appear counterparties, goods or places and the method of their use that are subject to sanctions, the information should be reported to Person in charge specified in section 10 of this Policy, prior to any further actions.

7.5 Since the main negative consequence for the Company in the event of the implementation of sanctions risk is the spread of sanctions against it, its controlling and / or controlled persons, as well as persons belonging to the corporate body, and non-compliance with this Policy multiply enhance the likelihood of such negative consequences, failure to comply with the requirements of this Policy may incur liability for a person who does not comply with them, as provided for by applicable law.

7.6 To comply with the requirements of this Policy, the Person in charge is obliged to carry out the maximally selective verification of all counterparties as well as those that are essential for the Company as potential counterparties. At the same time, the Person in charge, if possible, checks any other existing or potential counterparties and business partners of the Company, if such a verification is expedient.

7.7 The employees of the Company must inform the Person in charge about potential counterparties who have not passed the verification procedure; in case of any doubts as to whether verification of a potential counterparty has been carried out, employees are must



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contact the Person in charge. Employees of the Company must cooperate with the Person in charge in obtaining information related to the verification process.

7.8 When concluding transactions, the Company must respect the opinion of the Person in charge on the acceptability of sanctions risks in connection with such transactions;

7.9 The company must cooperate with supervisory and regulatory (including law enforcement) authorities, other organizations, as well as individuals in order to ensure effective application of this Policy. The Company also undertakes to support authorized representatives of supervisory and regulatory authorities, if the latter decide to conduct an audit of the Company's activities.

7.10 If the employees of the Company have doubts about the legality and ethics of certain actions or circumstances, as well as if, in their opinion, there is a threat of negative consequences of implementation of sanctions measures against the Company, such employees must inform the Person in charge.

7.11 The Company undertakes to assess risks related to sanctions on a regular basis in order to prevent certain types of the Company's activities which create an increased risk of negative consequences due to sanctions. The Person in charge initiates a risk assessment of the Company both for the Company's expenses and for its revenue side, at least twice a year and, based on the results of such an assessment, prepares a report on "risk zones" and possible violations.

## **8. Interaction with third parties**

8.1 In the course of its activities, the Company directly interacts with third parties (counterparties, including subcontractors, government officials, including officials of foreign countries, and other persons). Employees of the Company must ensure that there are no violations or circumvention of the principles and rules set forth in this Policy by third party, whose actions may be interpreted as actions of the Company. Thus, in the process of interacting with third party, the employees of the Company must avoid any actions (inactions) which can expose the Company to the risk of violation of any provisions of this Policy and increase the risk of negative consequences for the Company in connection with sanctions;

8.2 The concluded and proposed contracts for the supply of Goods should, if possible, be amended by conditions (in the format of additional agreement) containing representations about the circumstances in connection with sanctions.

8.3 The Counterparty may also provide the Company with a similar in content letter of representations on sanctions risks, containing a link to a relevant contract with the Company.

8.4 If, while concluding contract with a counterparty, the counterparty invites the Company to fix representations about the circumstances related to sanctions (other than those specified in clauses 8.2 and 8.3 of the Policy), then employee responsible for the transaction, prior to accept such representations, must agree on the text the Person in charge and after their signing (if such representations about the circumstances are drawn up in a separate document, for instance, a letter or agreement) must provide the Person in charge with a signed scanned copy of the document.

8.5 When carrying out accreditation of new counterparty and making decision on cooperation, it is necessary to request the Certificate of Representations.

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## **9. Business ethics of the Company in the light of sanctions**

In addition to the basic ethical rules and principles of the Company, employees of the Company, in the course of their duties, must also strive to comply with the following ethical rules and principles, which are especially important in the light of sanctions:

- fully comply with the principles and rules established by this Policy, as well as the principles and rules established by applicable law; in the absence of applicable rules, employees of the Company are guided by the principles of legality, good faith, reasonableness and justice;
- maintain fair business relations and refrain from unscrupulous commercial transactions;
- in the course of carrying out commercial transactions, adhere to the principle of prevention of any actions that entail risks of violation by the Company of sanctions prohibitions and restrictions;
- make decisions based on a deep and comprehensive analysis of sanctions, take into account the interests of the Company and its partners;
- refrain from using unethical business practices.

Non-compliance with the above principles and rules by the employees of the Company gives cause for imposition of a labour or disciplinary penalty.

## **10. Person in charge**

10.1 For the purposes of effective control over implementation of this Policy, by order of the MP the Company appoints Person in charge.

10.2 Person in charge assumes the responsibilities for:

- monitoring compliance with the Policy;
- working in coordination with the employees of the Company in order to explain the principles and rules set forth in this Policy;
- examining materials containing information required by clause 11.3 of this Policy, and, if possible, monitoring published information materials;
- receiving and verifying reports (notifications) of the Company's employees about violations of this Policy and applicable law, as well as notifications specified in this Policy;
- organizing sanctions risk assessment procedures within the Company and presenting the results to MP;
- jointly with MP during the first year of this Policy, examining all counterparties under existing contracts to which the Company is a party, in accordance with the procedure set out in section 11 of the Policy and presenting the results of the inspection to MP;
- assessing sanctions risks of concluding transactions with counterparties in accordance with section 11 of the Policy;
- providing expertise and aligning the text of representations about the circumstances related to sanctions proposed for signing by counterparties in accordance with clause 8.4;
- if necessary, upon agreement with MP, involving external consultants to conduct additional analysis of information received from counterparties and business partners;
- informing employees of the Company about the latest changes in the field of sanctions and trends in relevant practice;
- monitoring new developments and amendments in legislation of states that have introduced or are imposing sanctions related to addition to the lists of persons, goods and services that are subject to sanctions;

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- cooperating with supervisory and regulatory authorities in the course of investigations related to sanctions;
- in case of doubt seeking clarifications on compliance with the requirements of the applicable legislation to the authorities enforcing the legislation, upon prior agreement with MP;
- reporting and advising the Company's management body on key issues of compliance with the requirements of the Policy and applicable law.

## **11. The procedure for verification of transactions for the presence of risks related to sanctions**

11.1 Before making a decision to enter or continue legal relations with any counterparty, as well as before making a decision on establishment or participation in a joint venture, the employee responsible for conclusion of the transaction with the counterparty must request the counterparty to provide Certificate of Representations. When importing goods of American origin to Russia from the US, the employee responsible for transaction with a counterparty must (if necessary in cooperation with the Person in charge) check the presence of the counterparty in the list of persons subject to specific license requirements for the export (the U.S. Entity List), in the list of persons whose export privileges have been denied (the U.S. Denied Persons List) or in another list of persons subject to restrictions on export from the US.

11.2 In the event that potential counterparty, or person controlling it, is a person listed in the SDN, it is necessary to decline a transaction, contract or other legal relations with such counterparties, and current contracts with counterparties must be terminated according to legal order (contract) or new additional agreements / appendices (specifications) should not be signed with them.

11.3 In the event that potential counterparty, or person controlling it, is a person listed in the SSI, it is necessary to verify areas of application, where and what way the counterparty plans to use the goods.

Approval of transactions by Person in charge is required in case an employee responsible for the transaction has information or reasonable grounds to assume that the counterparty plans to use the purchased goods (or carries out activities in the following areas (including providing direct or indirect support) in one of the ways stated below:

a) exploration and production of oil in Arctic offshore fields in the Arctic region within the sovereignty of the Russian Federation;

b) exploration and production of oil in deep-water offshore fields over 500 feet (152.4 meters) located in the exclusive economic zone of the Russian Federation;

c) exploration and production of shale oil fields located on the territory of the Russian Federation;

d) provision, export, directly or indirectly, of goods, services, technologies aimed to support exploration and production of oil as part of new projects and significant investment activities in the projects (except for the projects initiated before January 29, 2018); of oil exploration and production in deep-water, offshore, Arctic and shale oil fields notwithstanding geographical location, in which the counterparty owns at least 33% interest or the majority of voting stock (except for financial services );

e) realization, lease, provision by the Russian Federation of goods, services, technologies, information or support for construction of main export pipelines originating from the territory of the Russian Federation and making investment in the construction if it directly and significantly expands the possibilities for construction of main export pipelines in Russia and market value of the investment is equal or exceeds USD 1 million, or if



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investment activities are carried out for 12 consecutive months and total value is equal or exceeds USD 5 million (except for the projects initiated before August 2, 2017, Caspian Pipeline Consortium);

11.3.1 Approval of transactions by Person in charge under clause 11.3 is mandatory for transactions when amount of transaction / specification within the transaction is equal to or exceeds 10.000 Euros excluding taxes (criterion of materiality). If criterion of materiality is not met, the approval of the transaction is optional and control is carried out on selective basis.

Approval of transactions by Person in charge under subparagraph e of clause 11.3 is mandatory regardless the amount of transaction, that is, criterion of materiality is not applicable to subparagraph e of clause 11.3.

11.3.2 Approval of transactions by Person in charge is mandatory for transactions with counterparty listed in SSI, when opening deposit accounts, purchase of promissory notes and other financing (for instance, commercial credits):

- for the period exceeding 14 days (for credit institutions listed in SSI), when the amount of financing exceeds 1.000.000 Euros (equivalent in Euro at the exchange rate on the date of the transaction);

- for the period exceeding 60 days (for non-credit institutions listed in SSI), when the amount of financing exceeds 1.000.000 Euros (equivalent in Euro at the exchange rate on the date of the transaction)

11.4 In case an employee responsible for the transaction has information or reasonable grounds to assume that the counterparty and / or its controllers and / or the consignee under such transaction operates or plans to operate and / or is registered in Donetsk or Lugansk regions of Ukraine, Libya, Venezuela, Somalia, South Sudan or Sudan, Cuba, Zimbabwe, Lebanon, Yemen, the transaction is subject to mandatory approval of Person in charge. At the same time, the policy of the Company is to refrain as much as possible from carrying out commercial activities with the counterparties mentioned in this paragraph.

11.4.1 In case an employee responsible for the transaction has information or reasonable grounds to assume that the counterparty and / or its controlling person and / or the consignee under such transaction operates or plans to operate and / or is registered on the territory of the Crimean Peninsula or Sevastopol, North Korea, Islamic Republic of Iran, Syrian Arab Republic, Turkish Republic of Northern Cyprus or the territory called "temporarily uncontrolled territory of Ukraine, including the territory of Luhansk and Donetsk regions" (DPR and LPR), then the policy of the Company is to strictly refrain from commercial activities (conclusion of transactions) with such counterparties.

11.5 Approval of transactions by Person in charge is mandatory for transactions involving supply of Goods that contain in any volume products and technologies (including information technology), country of origin of which is the US. The policy of the Company is to strictly refrain from commercial activities (conclusion of transactions) involving supply of Goods to counterparties consignees referred to in clause 11.4.

11.6 Approval of transactions by Person in charge is mandatory for transactions involving sale, lease, or other provision of goods marked with the API hologram to the counterparty. In this case, the employee responsible for transaction must receive from the counterparty documentary confirmation that the supplied goods are not used in one of the ways specified in clause 11.3 and / or in the territories / states referred to in clause 11.4, as well as keep statistics of shipments of goods marked with an API hologram, including the name of the counteragent and the scope of the intended use of the goods.

11.7 In case an employee responsible for the transaction has reasonable grounds to assume that the owner (or a controller holding 50% of share capital or more, directly or

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indirectly) of such counterparty is an individual included in the SDN list, then this information is brought to attention of Person in charge for further verification. Upon confirmation of the information by the Person in charge, the consequences of clause 11.2 of this Policy shall apply.

11.8 When the approval of Person in charge is required in accordance with clauses 11.3 and 11.4, the employee responsible for transaction with the counterparty in advance provides the Person in charge with the entire available information (including technical) which is necessary to assess sanctions risks related to interaction with the counterparty.

11.9 Upon receipt of a request for an assessment of the sanctions risks under transaction, the Person in charge is obliged to find and analyze information about potential counterparties, their reputation, whether they have adopted corresponding local acts (policies), and whether a conflict of interest exists using the Certificate of Representations. In this case, the Certificate of Representations must be forwarded by the employee responsible for transaction to the potential counterparty for filling. Filled Certificate of Representations should be addressed to the Person in charge for analyzing. During the inspection, the Person in charge consults with technical specialists if necessary. During verification responsible person consults with technical specialists if necessary.

11.10 The period for verification by the Person in charge should not exceed 5 working days from the date following the date of receipt of the request, but in any case, not less than 3 working days from the date of submission of the completed checklist (if applicable) and submission of documents. Other terms and conditions may be agreed upon by the relevant service agreement with the Person in charge.

11.11 In case during verification of transaction for sanctions risks, Person in charge finds out that the conclusion of the transaction may entail risks for the Company, the responsible party must:

- inform MP and offer the employee responsible for transaction to decline signing of a contract or decline a contract on his own, if it does not contradict current legislation;
- check the availability of funds and other assets of the sanctioned counterparty at the Company's disposal;
- prepare proposals for further actions in respect of such funds and assets (if any);
- provide MP with additional information upon request.

11.12 In case the transaction was declined by Person in charge in accordance with clauses 11.3 or 11.4 of the Policy, the employee responsible for transaction may write submission to MP with a request for his decision to conclude transaction.

## **12. Data collection and reporting**

12.1 If any doubts about the legality of actions or about compliance with the ethical rules and principles of the Company in connection with the sanctions arise, the employees of the Company must seek help from the Person in charge. In the absence of Person in charge (including if Person in charge is not appointed or the contract is terminated), the employee must contact its immediate supervisor or MP.

12.2 Information about any transactions and commercial relations that involve significant risk to the Company in connection with sanctions must be kept for at least ten years, unless otherwise provided by the rules for storing in the Company's documents. Employees must receive written permission from Person in charge before the destruction of documents provided for by this Policy, within ten years from the date of closing the transaction or termination of commercial relations.

12.3 The employees of the Company must inform Person in charge about all risks of violation of this Policy and applicable law.

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12.4 The Company grants that no employee is subject to disciplinary action for reporting potential violations of this Policy or applicable law to MP or regulatory authorities.

12.5 The Company encourages employees, counterparties and other interested parties to report concerns about potential non-compliance with this Policy at the earliest opportunity, as well as make proposals for improving the system of compliance with the requirements of this Policy introduced in the Company.

12.6 All reports and proposals should be presented to one of the following persons:

- Person in charge (priority);
- immediate supervisor;
- managing partner;

12.7 Reports are submitted in writing or electronically. The company is committed to maintain the confidentiality of all employees who report potential violations of this Policy and applicable law in good faith.

### 13. Responsibilities

13.1 Members of the corporate body of the Company, employees of the Company are responsible for non-compliance with the requirements of this Policy, as well as for the actions (inaction) of their subordinates in accordance with applicable law.

13.2 For violation of this Policy, persons may be held liable (disciplinary, administrative, civil or criminal) at the initiative of the Company, controlling / regulatory bodies or other persons. Such responsibility may arise in the form and on the grounds established by applicable law, corporate documents of the Company, local regulations or labor and civil contracts.

### 14. Final clauses

14.1 In the event of changes to applicable law, this Policy should be revised and brought in compliance with applicable law. The Person in charge must ensure such revision and corresponding changes.

14.2 If necessary, the Company may adopt the Information Policy of the Company in the context of sanctions and the Company's Principles in view of sanctions.

14.3 In addition to the procedures set out in this Policy and in order to ensure its effectiveness, the Company may take other measures, including implementation of employee protection programs, annual check on conflicts of interest, periodic risk assessment procedures, employee training (seminars, lectures, sessions), periodic external checks and measures to regularly assess compliance with the requirements of this Policy and applicable law.

Managing partner

Sergey Kalnitsky





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**Appendix № 1**

Приложение №\_\_ к Договору № \_\_\_\_\_ от \_\_\_\_\_

Appendix № \_\_ to the Contract № \_\_\_\_\_ of \_\_\_\_\_

**СЕРТИФИКАТ-ЗАВЕРЕНИЙ**

**CERTIFICATE OF REPRESENTATIONS**

Настоящим Сертификатом-заверений «\_\_\_\_\_» (далее по тексту «**Покупатель**») заверяет и гарантирует достоверность всех нижепредоставленных сведений. Настоящий Сертификат-заверений является неотъемлемой частью к Договору № \_\_ от \_\_\_\_\_, содержит дополнительные существенные условия и применяется для предотвращения нарушения санкционного законодательства и действующих санкционных ограничений согласно вышеуказанному Договору.

The present Certificate of representation «\_\_\_\_\_» (hereinafter referred to as the «**Buyer**») represents and warrants the accuracy of the information provided below. The present Certificate of representations is an integral part of the Contract № \_\_ of \_\_\_\_\_, contains additional substantial conditions and applies to prevent violation of sanctions legislation and current restrictive measures as specified in the foregoing Contract.

Участники/акционеры Покупателя. Members/Shareholders of the Buyer.	
Бенефициары Покупателя. Beneficiaries of the Buyer.	
Единоличный исполнительный орган Покупателя/Состав органов управления. Single executive body of the Buyer/Members of the corporate body.	
Гражданство и место постоянного проживания руководителей высшего звена (директора, членов совета)	



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<p>директоров), участников / акционеров и бенефициаров Покупателя.</p> <p>Nationality and habitual residence of senior executives (directors, board members), members / shareholders and beneficiaries of the Buyer.</p>	
<p>Включен ли кто-либо из руководителей высшего звена (директор, члены Совета директоров), участников / акционеров или бенефициаров Покупателя в список лиц, на которых распространяются санкции.</p> <p>Whether senior executives (directors, board members), members / shareholders and beneficiaries of the Buyer are included in sanctions list.</p>	
<p>Является ли Покупатель конечным пользователем Товара или посредником / регистрационные данные конечного пользователя Товара.</p> <p>Whether the Buyer is the end user or re-seller of the Goods / the registration data of the end user of the Goods.</p>	
<p>В какой стране/странах зарегистрирован и/или находится конечный пользователь(и) Товара.</p> <p>Country/countries of registration and/or location of end user(s) the Goods.</p>	
<p>Каким образом и где территориально конечный пользователь будет использовать Товар.</p> <p>The manner of usage and geographical location where the end user is going to use the Goods.</p>	
<p>Наличие или отсутствие в составе участников/ акционеров / бенефициаров Покупателя лиц, владеющих долями /</p>	

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<p>акциями в размере более 50 процентов их уставного капитала.</p> <p>Whether or not members / shareholders / beneficiaries of the Buyer hold 50% of share capital.</p>	
<p>Является ли Покупатель (или его субподрядчики, аффилированные лица, директора, материнская компания, агенты и т.д.) объектом применения санкционного законодательства.</p> <p>Whether the Buyer (or its subcontractors, affiliates, directors, parent company, agents, etc.) fall within the scope of sanctions legislation.</p>	
<p>Осуществляет ли Покупатель какую-либо деятельность в Донецкой или Луганской областях Республики Украина, а также на территории полуострова Крым или в г. Севастополе.</p> <p>Whether the Buyer operates in Donetsk or Lugansk regions of Ukraine, and on the territory of the Crimean Peninsula or Sevastopol.</p>	
<p>Осуществляет ли Покупатель какую-либо деятельность, связанную с :</p> <p>Whether the Buyer conducts any activities related to:</p> <p>1. разведкой и добычей нефти на морских арктических месторождениях на территориях Арктики, которые попадают под суверенитет РФ</p> <p style="padding-left: 20px;">exploration and production of oil in Arctic offshore fields in the Arctic region within the sovereignty of the Russian Federation;</p> <p>2. разведкой и добычей нефти на морских глубоководных месторождениях, превышающих 500 футов (152,4 метра), распо-</p>	<p>1.</p> <p>2.</p>

<p>ложенных в исключительной экономической зоне Российской Федерации</p> <p>exploration and production of oil in deep-water offshore fields over 500 feet (152.4 meters) located in the exclusive economic zone of the Russian Federation;</p> <p>3. разведкой и добычей сланцевой нефти на месторождениях, расположенных на территории РФ</p> <p>exploration and production of shale oil fields located on the territory of the Russian Federation;</p> <p>4. предоставлением, экспортом, прямо или косвенно товаров, услуг, технологий, которые направлены на поддержку добычи или производства нефти в рамках новых проектов (для российских компаний только для проектов за пределами РФ) и осуществление значительных инвестиций в такие проекты (за исключением проектов, инициированных до 29 января 2018 года) по разведке и добыче нефти на глубоководных, морских арктических и сланцевых месторождениях, независимо от их географического расположения, в котором Покупатель владеет не менее 33 % доли участия или большинством голосующих акций</p> <p>provision, export, directly or indirectly, of goods, services, technologies aimed to support exploration and production of oil as part of new projects (for Russian companies for the projects outside the Russian Federation only) and significant investment activities in the projects (except for the projects initiated before January 29, 2018) of oil exploration and production in deep-water, offshore, Arctic and shale oil fields notwithstanding geographical location, in which the Buyer owns at least 33% interest or the majority of voting stock;</p> <p>5. продажей, сдачей в аренду, предоставлением РФ товаров или услуг, технологий, информации или поддержки для строительства магистральных экспортных тру-</p>	<p>3.</p> <p>4.</p> <p>5.</p>
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<p>бопроводов, происходящих с территории РФ, и осуществление инвестиций в такое строительство, если они непосредственно и существенно расширяют возможности по строительству магистральных экспортных трубопроводов в России и имеют рыночную стоимость равную 1 млн. долл. США и более или, если деятельность, которая осуществлялась в течении 12 месяцев подряд, имеет стоимость 5 млн долл. и более (за исключением проектов, инициированных до «02» августа 2017 г.)</p> <p>realization, lease, provision by the Russian Federation of goods, services, technologies, information or support for construction of main export pipelines originating from the territory of the Russian Federation and making investment in the construction if it directly and significantly expands the possibilities for construction of main export pipelines in Russia and market value of the investment is equal or exceeds USD 1 million, or if investment activities are carried out for 12 consecutive months and total value is equal or exceeds USD 5 million (except for the projects initiated before August 2, 2017);</p> <p>6. размещением депозитов, приобретением векселей и предоставлением иного финансирования на срок, превышающий 14 дней (для кредитных организаций) и на срок, превышающий 60 дней (для российских нефтяных компаний)</p> <p>opening of deposit accounts, purchase of promissory notes and other financing for the period exceeding 14 days (for credit institutions) and for the period exceeding 60 days (for Russian oil companies).</p> <p>7. финансированием терроризма, террористических организаций и другими видами схожей деятельности</p> <p>financing of terrorism, terrorist organizations and other related support in this regard;</p> <p>8. финансированием политических компаний и организаций, деятельность которых</p>	<p>6.</p> <p>7.</p> <p>8.</p>
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<p>направлена на свержение существующих демократических режимов</p> <p>financing of political companies and organizations whose activities are aimed at overthrowing existing democratic regimes;</p> <p>9. финансированием политических компаний и организаций, деятельность которых прямо или косвенно направлена против США</p> <p>financing of political companies, organizations whose activities are directly or indirectly directed against the legal order of the United States.</p>	<p>9.</p>
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Достоверность информации подтверждаю

I hereby confirm the accuracy of the information:

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**Appendix №2**

Appendix №\_\_ to the Contract № \_\_\_\_\_ of \_\_\_\_\_

**CERTIFICATE OF REPRESENTATIONS**

The present Certificate of representation « \_\_\_\_\_ » (hereinafter referred to as the «**Seller**») represents and warrants the accuracy of the information provided below. The present Certificate of representations is an integral part of the Contract № \_\_\_\_\_ of \_\_\_\_\_, contains additional substantial conditions and applies to prevent violation of sanctions legislation and current restrictive measures as specified in the foregoing Contract.

Members/Shareholders of the Seller	
Beneficiaries of the Seller	
Single executive body of the Seller / Members of the corporate body	
Nationality and habitual residence of senior executives (directors, board members), members / shareholders and beneficiaries of the Seller	
Whether senior executives (directors, board members), members / shareholders and beneficiaries of the Seller are included in sanctions list	
Whether the Seller is a Manufacturer or Re-Seller of the Goods / the registration data of the Manufacturer of the Goods	
Country/countries of Manufacturer and Production of the Goods	
The manner of usage and geographical location where the end user (under other	

contracts concluded by the Seller with third parties) is going to use the Goods	
Whether or not members / shareholders / beneficiaries of the Seller hold 50% of share capital	
Whether the Seller (or its subcontractors, affiliates, Manufacturers, directors, parent company, agents, etc.) fall within the scope of sanctions legislation	
Whether the Seller and/or Manufacturer operates or carries out deliveries in Donetsk or Lugansk regions of Ukraine, and on the territory of the Crimean Peninsula or Sevastopol, North Korea, Islamic Republic of Iran, Syrian Arab Republic, Turkish Republic of Northern Cyprus	
<p>Whether the Seller conducts any activities related to:</p> <ol style="list-style-type: none"> <li>1. exploration and production of oil in Arctic offshore fields in the Arctic region within the sovereignty of the Russian Federation;</li> <li>2. exploration and production of oil in deep-water offshore fields over 500 feet (152.4 meters) located in the exclusive economic zone of the Russian Federation;</li> <li>3. exploration and production of shale oil fields located on the territory of the Russian Federation;</li> <li>4. provision, export, directly or indirectly, of goods, services, technologies aimed to support exploration and production of oil as part of new projects (for Russian companies for the projects outside the Russian Federation only) and significant investment activities in the projects (except for the projects initiated before January 29, 2018) of oil exploration and production in deep-water, offshore, Arctic and shale oil fields</li> </ol>	<ol style="list-style-type: none"> <li>1.</li> <li>2.</li> <li>3.</li> <li>4.</li> </ol>

<p>notwithstanding geographical location, in which the Seller owns at least 33% interest or the majority of voting stock;</p> <p>5. realization, lease, provision by the Russian Federation of goods, services, technologies, information or support for construction of main export pipelines originating from the territory of the Russian Federation and making investment in the construction if it directly and significantly expands the possibilities for construction of main export pipelines in Russia and market value of the investment is equal or exceeds USD 1 million, or if investment activities are carried out for 12 consecutive months and total value is equal or exceeds USD 5 million (except for the projects initiated before August 2, 2017);</p> <p>6. opening of deposit accounts, purchase of promissory notes and other financing for the period exceeding 14 days (for credit institutions) and for the period exceeding 60 days (for Russian oil companies);</p> <p>7. financing of terrorism, terrorist organizations and other related support in this regard;</p> <p>8. financing of political companies and organizations whose activities are aimed at overthrowing existing democratic regimes;</p> <p>9. financing of political companies, organizations whose activities are directly or indirectly directed against the legal order of the United States.</p>	<p>5.</p> <p>6.</p> <p>7.</p> <p>8.</p> <p>9.</p>
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I hereby confirm the accuracy of the information:

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