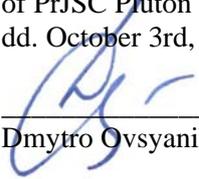


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Anti-corruption Program of Private Joint-Stock Company PLUTON

Anti-corruption Program of **Private Joint-Stock Company PLUTON** defines rules, standards and procedures for exposure, counteraction and prevention of corruption in economic activity of the Company.

This Program is developed in accordance with Constitution of Ukraine, Law of Ukraine "On Corruption Prevention", Law of Ukraine "On Fundamentals of State Anti-corruption Policy in Ukraine (Anti-corruption Strategy) for the period of 2014-2017", and other anti-corruption legislation of Ukraine.

Anti-corruption Program applies to all the officers and employees of the Private Joint-Stock Company PLUTON, including students being at on-the-job training or persons working under employment agreement.

1. Terms used in this Anti-corruption Program

anti-corruption expertise - activities of exposure in legal acts, drafts of legal acts, provisions that alone or in combination with other standards can contribute to corruption offenses or offenses related to corruption;

direct subordination - the relationship of direct organizational or legal dependence of subordinate entity on its manager, including decision-making (participation in decision-making) in recruitment, dismissal, use of incentives, disciplinary measures, providing guidance, instructions, etc., monitoring of their implementation;

connected persons - persons who live together, connected by common life and mutual rights and obligations with the entities referred to in Paragraph 1 Article 3 of the Law of Ukraine "On Prevention of Corruption" (except for the persons whose mutual rights and obligations with the entity are of no family nature), including persons who live together but are not married, and - regardless of the indicated conditions - are husband, wife, father, mother, stepfather, stepmother, son, daughter, stepson, stepdaughter, brother, sister, grandfather, grandmother, great-grandfather, great-grandmother, grandson, granddaughter, great-grandson, great-granddaughter, son-in-law, daughter-in-law, father-in-law, mother-in-law, adoptive parent or adopted child, guardian or trustee, a person who is in the custody or guardianship of said person;

corruption offense - an act that has signs of corruption committed by a person referred to in paragraph 1 Article 3 of the Law of Ukraine "On Prevention of Corruption", for which the law provides criminal, disciplinary and / or civil liability;

corruption - when the person referred to in paragraph 1 of Article 3 of the Law of Ukraine "On Prevention of Corruption" uses authority granted to him or the related opportunities in order to obtain improper advantage or reception of such an advantage or acceptance of a promise / offer of such an advantage for himself or others, or promise / offer to provide improper advantage to a person referred to in Article 3 of this Law, or at his request to other natural or legal persons in order to persuade that person to the unlawful use of granted authorities or related opportunities;

improper advantage - cash or other property, advantages, benefits, services, intangibles, and any other intangible or non-monetary benefits which are promised, offered, given or received without legal justification;

potential conflict of interests - a person having a private interest in the area in which it performs its official or representative powers that could affect the objectivity or impartiality of its decisions, performance or non-performance of actions within execution of these powers;

gift - money or other property, advantages, benefits, services, intangibles which give / get for free or at a price below the minimum market price;

offense, connected with corruption - an act that has no signs of corruption but violates requirements, prohibitions and restrictions established by this Law, that was done by a person referred to in Paragraph 1 of Article 3 of Law of Ukraine "On Prevention of Corruption", for which the law provides criminal, administrative, disciplinary and / or civil liability;

private interest - any property or non-property interest of a person, including caused by personal, family, friendly or other off-duty relations with natural or legal persons, including those arising from membership or activities in civil, political, religious or other organizations;

real conflict of interests - disagreement between private interest of the person or its official or representative powers that could affect the objectivity or impartiality of its decisions, performance or non-performance of actions within execution of these powers;

declaring subjects - the persons referred to in paragraph 1, sub-paragraph "a" of paragraph 2 of the first part of the Law of Ukraine "On Prevention of Corruption" and other persons required to file a declaration under this Law;

family members - married persons, and their children, including adults, parents, persons under guardianship, and other persons who live together, connected by joint household, mutual rights and responsibilities (except for the persons whose mutual rights and obligations are of no family nature), including persons who live together but are not married.

2. Anti-corruption Strategy (complete list) and Description of anti-corruption measures, standards, procedures and order of their performance (application)

For strict compliance with anti-corruption legislation of Ukraine PrJSC PLUTON in the course of economic activity implements Anti-corruption Strategy of the company.

2.1. In particular, develops, implements and performs practical anti-corruption measures and monitors their implementation. Provides regular assessment of corruption risks that exist in the company and takes steps to eliminate them. Applies preventive anti-corruption mechanisms, takes steps to curb corruption offenses, develops appropriate plans, regulations, orders and instructions governing the activities of prevention and combating corruption. Conducts anti-corruption expertise of legal acts issued by the company. Provides activities of Designated Person for the prevention and detection of corruption. Provides internal monitoring and control over implementation of legislative measures on ethical behavior, prevention and settlement of conflicts of interest of public officials. Provides clarifications on the procedures for filling declarations by officials and monitors the timeliness of delivery. Contributes to the organization of training, retraining and advanced training of employees on issues related to the prevention of corruption. If necessary, conducts internal investigations for signs of corruption and corruption offenses. Organizes interaction with a specially authorized entities in combating corruption. Develops standards of ethical behavior of employees and creates in a team an environment of intolerance for possible corruption, promoting exposure of preparation and commitment of corruption offenses. Develops measures to protect the person who reported the facts of incitement to commit a corruption offense or committed corruption or corruption-related offenses by other workers.

2.2. To implement the anti-corruption strategy the company performs these **anti-corruption measures**:

2.2.1. Communicates to the officials and all employees information about restrictions in accordance with the applicable anti-corruption laws of Ukraine.

2.3. Takes measures to prevent conflicts of interest and their solution, if there is.

2.4. Periodically gives seminars for workers for clarification of regulations of Company's Anti-corruption Program and anti-corruption legislation, for additional training in preventing and combating corruption.

2.5. Informs employees against signed acknowledgement on criminal, administrative, civil liability for violations of Anti-corruption Programs and Provisions on confidential information.

2.6. Introduces a post and appoints a person responsible for implementing of Anti-corruption Program (hereinafter - the Commissioner).

2.7. The company introduces regular (annual) assessment of corruption risks in business. For this reason, by the decision of the CEO, if necessary, independent experts may be involved and audits may be performed.

If necessary, CEO may decide to hold an extraordinary assessment of corruption risks.

2.8. Employees of the company are prohibited from using their official powers or their position and related opportunities in order to obtain undue advantage for himself or others, including the use of any property or company resources for private interests.

2.9. Employees are not allowed directly or through other persons to require, request, receive gifts for themselves or persons close to them from businesses and individuals in connection with their duties or if the person that makes such a gift is subordinate to that person.

But, employees of the Company can accept gifts that correspond to generally recognized idea of hospitality, except for the cases provided by the paragraph 1 of this item, if their cost does not exceed one minimal salary valid for the day of gift reception, single time, and aggregate value of such gifts received from the same source within one year does not exceed two minimum living wages established for able-bodied person as of 1st of January of the current year.

Abovementioned restriction on the value of gifts does not apply to gifts that are presented by close persons or received as generally available discounts for goods, services, generally available awards, prizes, premiums, bonuses.

Decision adopted by official of the company, in favor of the person from whom he or his close persons received a gift, is considered to be made in terms of conflict of interest.

2.11. officials (employees) of the company if they are offered improper advantage or gift, regardless of private interests, must immediately take the following measures:

- to decline offer;
- if possible, to identify the person that made an offer;
- to involve eyewitnesses, including employees;
- to inform in writing on the offer from the direct supervisor (if present) or head of the Company and the Commissioner on the implementation of Anti-corruption Program.

If the official of the Company has found in his office or received property, which may be an improper advantage or gift, he must immediately, but no later than one business day to issue written notice of that fact to their immediate supervisor, the Commissioner or CEO of the Company.

When revealing the property that may be improper advantage or gift the formal note is drawn up and signed by the person who revealed improper advantage or gift, and his immediate supervisor, CEO or his deputy and the Commissioner.

If the property that may be improper advantage or gift is revealed by the person who is the head of the company, the formal note on revelation of property that may be improper advantage or gift, is signed by that person and the Commissioner and a representative of Zaporizhzhya City Council (Zaporizhzhya City Administration).

2.12. The Company's management informs employees on the restrictions of part-time job and positions overlapping by the officials, providing the same activities indicated in the job description for the main job.

Provisions of this paragraph do not apply to persons engaged in part-time job or overlapping positions within the company.

2.13. Officials (employees) of the Company are required to report no later than the next business day from the moment they learned or had to learn of the existence of real or potential conflict of interest to their immediate supervisor, and if the conflict is connected with immediate supervisor - to CEO of the Company and the Commissioner.

Also, employees should not perform any actions and take decisions in a real conflict of interests and should take the appropriate steps to resolve the conflict of interests.

2.14. Officials of the company, which competence includes dismissal (initiation of dismissal) from the position of employees within two working days after being informed that their subordinate has real or potential conflict of interests shall decide on clearing of the conflict of interests, and inform their subordinate about it.

2.15. Officials of the company, which competence includes dismissal (initiation of dismissal) from the position, who have learned about a conflict of interest of his subordinate, are required to take measures under the Law of Ukraine "On Prevention of Corruption" for the prevention and clearing of conflicts of interests of that person.

2.16. If the person has doubts whether he or she has conflict of interests, he or she has the right to refer for comments to the territorial authority of the National Agency, providing the appropriate explanation.

If the person has not received confirmation of no conflict of interests, he or she acts in accordance with the requirements of this Anti-corruption Program.

If the employee has received confirmation that there is no conflict of interest, he is free from liability if later in the actions regarding which he had asked an explanation a conflict of interests was revealed.

2.17. Employees of the company holding permanent or temporary positions related to the execution of organizational and regulatory or administrative and economic functions, and other persons who are not officials and performing work or providing services under contract with PrJSC PLUTON, that have real or potential conflict of interests, may independently take action to resolve it by making away with relevant private interests with submission of documents confirming this fact to the immediate supervisor who has the authority to dismiss (to initiate dismissal) from the position, to the Commissioner or CEO of the Company.

Note: above anti-corruption measures are held in the company in the manner and terms set by individual orders (regulations, instructions) of CEO. This list can be changed and supplemented by additional measures on the basis of the assessment of corruption risks that exist in the Company.

3. Norms of professional ethics of employees

3.1. Employees of the company while performing their duties are obliged to strictly abide by the requirements of law and generally accepted ethical standards, to be courteous in relations with citizens, supervisors, peers and subordinates.

3.2. While performing their duties officials and employees of the company **are obliged:**

- not to disclose or use in a different way confidential and other restricted information that became known to them in connection with their duties, except cases established by law;

- refrain from execution of orders or instructions if they contravene the law, regardless of private interests. Officials of the company independently assess the legitimacy of the Management's decisions or orders and the possible harm that will be caused in case of implementation of such decisions or orders.

- In case if a person gets orders or decisions for implementation which he considers illegal or offensive for legal rights, freedom or interests of individuals, legal entities, state or social interests, he must immediately inform in writing CEO of PrJSC PLUTON and the Commissioner.

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4. Rights and obligations of the Company's employees in connection with prevention and management of corruption in Company's activity

4.1. Officials and employees of PrJSC PLUTON and others who do the work and are in employment relations with the Company **have the right:**

- to request from the Company's management discussions of Anti-corruption Program provisions;

- to request from the Company's management to stick to the Anti-corruption Program provisions;

- to approach management of the Company or the Commissioner with requests for clarifications of any questions on interpretation of Anti-corruption Program provisions;

- to demand from the management of the Company fair solution of the case regarding conflict of interests;

- to apply to court for protection of violated rights;

- to choose any independent legal experts for assessment of corruption risks;

- to refrain from execution of orders or instructions of management if they contradict the law, regardless of private interests;

- to apply (to initiate application) to subordinate employees of the Company disciplinary penalties in cases stipulated by laws of Ukraine and the Anti-corruption Program and also to dismiss (to initiate dismissal) from their positions;

- to choose speakers for seminars for clarification of the rules of Anti-corruption Program of anti-corruption legislation.

- to take measures on settlement, including external, of conflict of interests.

- to apply to the Commissioner or police authorities with information on Company's officials' commission of corruption or corruption-related offenses.

4.2. Officials and employees of the Company and others who do the work and are in employment relations with the Company **are obliged:**

- not to commit and participate in the commission of corruption offenses related to the business activities of the Company;

- to refrain from conduct that could be interpreted as willingness to commit corruption offense connected with the activities of the company;

- to inform immediately the CEO of PrJSC PLUTON or the Commissioner about:

- all cases of incitement to commit a corruption offense relating to the activity of the Company;
- cases of corruption or corruption-related offenses committed by other employees of the Company;
- the emergence of real, potential conflict of interests;

- to give a two weeks' notice in writing to the CEO of PrJSC PLUTON, the Commissioner on intention to take second job, in case of the same duties as the main place of work;

- to communicate to the subordinate officers (employees) and all persons equated to them about limitations:

- on the use of official (duty) position;

- prevention of them obtaining undue advantage or reward and their use;
 - on second jobs and positions overlapping with the same types of activities;
- to take measures to prevent conflicts of interest and their solution, if there is;
- by decision of the head of the Company or on own initiative to conduct seminars for subordinate workers, the subject of which will be clarifications of regulations of Company's Anti-corruption Program and anti-corruption laws;
- to inform employees against signed acknowledgement on criminal, administrative, civil liability for violations of Anti-corruption Programs and Provisions on confidential information of PrJSC PLUTON;
- to take all necessary and urgent measures to protect the person who informed about corruption or corruption-related offenses.

5. The Legal Status of the Commissioner

5.1. The Commissioner is an officer of PrJSC Pluton, hired under employment agreement issued by the order of the CEO of PrJSC Pluton, according to labor legislation.

5.2. The Commissioner can be an individual who is capable in his professional and moral qualities, professional level, health, to perform relevant duties.

5.3. The Commissioner cannot be the person, that:

- has outstanding or unexpunged as prescribed by law conviction;
- recognized as legally incapable or with limited legal capability by the court;
- dismissed from positions in government bodies, authorities of the Autonomous Republic of Crimea, local self-government bodies for violation of oath or in connection with the commission of corruption offenses or offenses related to corruption - within three years from the date of such dismissal.

5.4. Incompatible with the activities of the Commissioner is to work in positions referred to in paragraph 1 of Article 3 of the Law of Ukraine "On Prevention of Corruption", as well as any other activity that creates a real or potential conflict of interests with the activities of PrJSC Pluton.

In the event of incompatibility circumstances the Commissioner within two days from the date of such circumstances shall inform the CEO of PrJSC Pluton while simultaneous submitting the application on termination of the employment contract on his own initiative.

5.5. The Commissioner may be dismissed prematurely in case of:

- termination of labor contract initiated by the Commissioner;
- termination of labor contract initiated by the CEO of the Company;
- impossibility to exercise his powers for health reasons according to the opinion of the medical commission;
- coming into effect of a court decision declaring him incapable or restricting his civil capacity, recognition of his missing or declaring him dead;
- coming into effect of a court conviction against him;
- death.

6. The rights and obligations of the Commissioner as an officer responsible for preventing corruption

6.1. The Commissioner as an official responsible for the prevention of corruption **has the following rights:**

- to request from the Company's management discussions of Anti-corruption Program provisions;
- to require from the officials (employees) of the company to keep to the provisions of the Anti-Corruption Program, the suspension of acts with signs of corruption, corruption offenses;
- to demand from the CEO of the Company fair solution of the case regarding conflict of interests;
- to refrain from execution of orders or instructions of management if they contradict the law, regardless of private interests;
- to approach governmental bodies responsible for combatting corruption with requests for clarifications of any questions on interpretation of anti-corruption legislation of Ukraine;
- to request and receive from all officials (employees) of PrJSC PLUTON written explanations on the implementation of anti-corruption legislation of Ukraine;

- to become acquainted and to get any documents relating to economic activity of the Company;
- to supervise timely submission of declaration by the officials of the Company;
- to initiate and to participate directly in conducting internal investigations on grounds of corruption and possible corruption offenses in the Company;
- to apply to the CEO and upon his instruction to the police authorities with information on Company's officials' commission of corruption or corruption-related offenses;
- to apply to court for protection of violated rights.

6.2. The Commissioner as an official responsible for the prevention of corruption **has the following obligations:**

- not to commit and participate in the commission of corruption offenses related to the business activity of PrJSC PLUTON;
- to refrain from conduct that could be interpreted as willingness to commit corruption offense connected with the activities of the Company;
- to monitor continuously compliance with anti-corruption legislation in the Company;
- to inform immediately CEO of PrJSC PLUTON on the cases of incitement to commit or committing corruption or corruption-related offenses by other workers;
- to inform CEO of the Company on the emergence of real, potential conflict of interests;
- to provide clarifications on any questions regarding the interpretation of the Anti-Corruption program by request of the officials (employees) of the Company;
- to report annually to the company's management regarding compliance with anti-corruption legislation in the Company and in case of corruption to report about uncovered corruption;
- to keep to the confidentiality requirements regarding information on persons who reported the facts of incitement them to commit a corruption offense or committed corruption or corruption-related offenses by other workers;
- to conduct individual counseling of employees on prevention of corruption;
- other duties that directly or indirectly arise in the performance of Anti-corruption Program.

7. Procedure for regular reporting of the Commissioner to the Management of the Company

7.1. The reporting period of the Commissioner responsible for the prevention of corruption to the CEO is 1 year.

The Commissioner shall report in writing with his signature to the CEO before January 20th of the year following the reporting year about compliance with anti-corruption legislation in the Company and in the case of corruption to report on its detection.

8. Procedure of the supervision and monitoring on compliance with Anti-corruption Program in Company's activity, and also evaluation of the results of implementation of measures prescribed by the Program

8.1. For the proper supervision, control and monitoring of compliance with Anti-corruption Program of PrJSC PLUTON, and also evaluation of the results of implementation of measures provided by it, the Commissioner may require provision by all the officials of oral and written clarifications on their observance of Anti-corruption Program, to receive any documents relevant to establish the presence (absence) of corruption signs in the actions of officials (employees).

8.2. CEO performs evaluation of the results of proper supervision, control and monitoring of compliance with Anti-corruption Program.

9. Confidentiality Policy on the Commissioner informing by the employees regarding the facts of incitement them to commit a corruption offense or committed corruption or corruption-related offenses by other employees or persons.

9.1. Any information that makes it possible to identify the person who reported the Commissioner on the facts of incitement to commit a corruption offense or committed by other employees or officials corruption or corruption-related offenses is related to confidential information in accordance with the Provisions of the confidential information and protected in accordance with the current legislation.

The person guilty for the disclosure of confidential information, shall be liable under the law.

10. The procedure for protection of employees who reported about corruption or corruption-related offenses

10.1. Any information about the employee who reported about corruption or corruption-related offenses can not be disclosed except cases prescribed by the law.

10.2. In the case of disclosure of confidential information about a person who reported on corruption or corruption-related offenses, the head, upon this person's application, must take all urgent measures to avoid negative consequences for a person related to such disclosure.

10.3. CEO and the Commissioner independently determine the measures which they believe are sufficient to protect employees that informed about corruption or corruption-related offenses, subject to written agreement of the employee with the terms of the proposed measures.

10.4. An employee of the company or his family member can not be fired or forced to employment termination, be held disciplinary liable or subjected from CEO's side to the other negative impact measures (transfer, attestation, change in working conditions, denial of appointment to the top job, wage cuts, etc.) or the threat of such measures in connection with his report on violations of this law by another person.

Information about the accuser may be disclosed only with his consent, except cases established by law.

11. The procedure of informing the Commissioner by employees about the origin of real, potential conflict of interests, and also order of settlement of identified conflict of interests.

11.1. Notice of violation of Anti-corruption Program can be made by an employee of the Company without attribution (anonymously).

Requirements for anonymous reports of violations of Anti-corruption Program and procedure for their consideration are defined by the Law of Ukraine "On Prevention of Corruption."

Anonymous report on violation of Anti-corruption Program requirements is subject to:

- consideration if information there relates to a particular company official, contains evidence that can be checked.

- verification within not more than fifteen days from the date of its receipt.

If it is impossible to verify information from the notice in the specified period of time, CEO may extend time for consideration to thirty days of its receipt.

11.2. If information from the Notice on violation of Anti-corruption Program requirements is confirmed the Commissioner and CEO of the Company take steps to stop the violation, to eliminate its consequences and to bring the perpetrators to disciplinary action, and in cases of detection of signs of a criminal or administrative offense shall also inform the specially authorized persons responsible for corruption combating .

11.3. Officials of the Company, in case of revelation of corruption or corruption-related offenses or information acquisition about the commission of the offense by the employees of the Company are obliged within their powers to take action to stop such offense and immediately notify Authorized person on its commission.

11.4. Employees of the Company are required to report no later than the next business day from the moment they learned or had to learn of the existence of real or potential conflict of interest to their immediate supervisor, the Commissioner, and if the conflict is connected with the CEO of the Company - to specially authorized persons in combating corruption.

11.5. Employees should not perform any actions and take decisions in a real conflict of interests and should take the appropriate steps to resolve the conflict of interests.

11.6. CEO of the Company, whose competence includes dismissal (initiation of dismissal) from the position of employees within two working days after being informed that his subordinate has real or potential conflict of interests shall decide on clearing of the conflict of interests, and informs his subordinate about it.

11.7. Official of the Company, whose competence includes dismissal (initiation of dismissal) from the position of the employees, who have learned about a conflict of interest of his subordinate, is required to take measures under the Law for the prevention and clearing of conflicts of interests of that person.

11.8. If the person has doubts whether he or she has conflict of interests, he or she has the right to refer for comments to the territorial authority of the National Agency.

If the person has not received confirmation of no conflict of interests, he or she acts in accordance with the requirements of this Anti-corruption Program.

If the person has received confirmation that there is no conflict of interest, he is free from liability if later in the actions regarding which he had asked an explanation a conflict of interests was revealed.

11.9. External settlement of interests conflict in the Company is performed **through**:

- dismissal of an official (employee) from the task performance, actions, decision-making or participation in decision-making in a real or potential conflict of interests;
- use of external control over the implementation by the person of the relevant individual tasks, his committing certain actions or making decisions;
- limitation of employee's access to certain information;
- reconsideration of the amount of Company's official's authorities;
- transfer of the official (employee) to another position;
- dismissal of the Company's official (employee).

11.10. Employees of the company holding permanent or temporary positions related to the execution of organizational and regulatory or administrative and economic functions, or specially authorized for the performance of such functions, and other persons who are not officials and performing work or providing services under contract with the Company, that have real or potential conflict of interests, may independently take action to resolve it by making away with relevant private interests with submission of documents confirming this fact to the immediate supervisor, to the Commissioner or CEO of the Company.

Release from private interest should exclude any possibility of its concealment.

Measures to resolve conflict of interests are subject to the Law of Ukraine "On prevention of corruption."

12. Procedure for individual counseling by the Commissioner of the employees on the application of anti-corruption standards and procedures

Any employee of the Company may apply to the Commissioner to obtain written or oral advice on the application of anti-corruption standards and procedures.

12.1. In order to obtain oral advice employee contacts the Commissioner 2 working days prior to the scheduled meeting to agree the time and place of the meeting.

12.2. In order to obtain a written advice employee contacts the Commissioner with a written request for advice on the application of anti-corruption standards and procedures, and the Commissioner is obliged within 5 working days to respond, if additional time to provide written advice due to the complexity of the question is necessary, this period may be extended but not for more than 5 working days.

13. The procedure for conducting periodic advanced training of employees on preventing and combating corruption

13.1. Annually, by the decision of the CEO, seminars are given for clarification of the rules of the Company's Anti-corruption Program and anti-corruption legislation for employees covered by the provisions of Anti-Corruption Program to improve their skills in preventing and combating corruption.

Employees are notified personally on the date of the seminar at least 10 days before the scheduled event.

13.2. CEO of the Company is obliged to organize a seminar for clarification of the rules of the Company's Anti-corruption Program and anti-corruption legislation, for advanced training in preventing and combating corruption, in case of a written request of at least 50% of employees.

14. Application of disciplinary measures for employees that violate Anti-Corruption Program

14.1. For corruption or corruption-related offenses, persons indicated in part one of the Article 3 of the Law "On Prevention of Corruption", are brought to criminal, administrative, civil and disciplinary responsibility in accordance with the law.

14.2. CEO of the company on his own initiative, by the request of the Commissioner or direct supervisor has the right to bring workers that violate Anti-corruption Programs to the disciplinary responsibility.

14.3. An official who has committed corruption offense or offenses linked to corruption, but the court did not apply penalty or charge him or her in the form of deprivation of the right to occupy certain positions or engage in certain activities in the company, is subject to disciplinary responsibility in the manner prescribed by law.

14.4. To the officials (employees) of the Company that violate Anti-corruption Program, can be apply the following penalties:

- warnings;
- reprimand;
- firing.

14.5. Procedure for bringing a person to disciplinary liability is governed by the Labor Code, collective agreement, Law of Ukraine "On Prevention of Corruption", Anti-corruption Program of PrJSC Pluton and job description of the employee.

15. The procedure for taking action to respond to the detected facts of corruption or corruption-related offenses, conducting internal investigations

15.1. If an employee has detected fact of corruption or corruption-related offense, he is obliged to inform immediately CEO of the Company and if there are signs of criminal or administrative offense in the actions of other employee to inform specially authorized state bodies.

15.2. In order to identify causes and conditions that contributed to the commission of corruption or corruption-related offenses or failure to comply with Anti-corruption Program, as advised by the Commissioner and under the order of the CEO of the Company, an internal investigation is conducted in the manner specified by certain legal acts.

15.3. Limitations regarding prohibition to a person removed from office due to liability for corruption offense, to engage in activities related to the performance of his functional (official) duties are established solely by the motivated decision of the court, unless otherwise provided by law.

15.4. An official the Company which was informed about the suspicion of having committed an offense within his/her official activity, is subject to suspension from his/her functional duties in the manner specified by law.

15.5. An official against whom administrative offense report connected to corruption was made, unless otherwise required by the Constitution and laws of Ukraine, can be suspended from the functional duties by the decision of the CEO of the Company until the end of court proceedings.

15.6. When closing the proceedings on administrative offenses related to corruption in the absence of events or administrative violations the person suspended from official duties gets compensation in the amount of average earnings during his forced absence, due to the suspension.

16. Procedure for amending the Anti-corruption Program

16.1 Amendments to the Anti-corruption Program of PrJSC Pluton are made by decision of CEO of PrJSC Pluton, subject to prior discussion of the amendments with employees of the Company.