

# Ethics

**Gazprom Neft conducts its business ethically and responsibly. The company expects all of its employees to follow the business norms and principles set out in the Corporate Code of Conduct. Our ethics policy applies to both interactions between colleagues and to relations with the company's business partners.**

## Ethics Committee

Gazprom Neft has set up an Ethics Committee as a standing collegial body tasked with monitoring compliance with the provisions of the company's Corporate Code of Conduct. The Committee reports to the CEO.

The Committee reviews employee reports involving the interpretation of the Corporate Code of Conduct. If necessary, the matter is investigated and a resolution is passed and communicated to the person who submitted the report. The Committee's terms of reference include rewards and disciplinary measures related to compliance or non-compliance with the Corporate Code of Conduct.

The committee's resolutions are recommendations for the relevant deputies of the CEO or the immediate senior and line managers of the employee whose behaviour was reviewed by the Committee.

### The Ethics Committee's roles

- enforcing a uniform corporate ideology and methodology for the interpretation and application of the Corporate Code of Conduct across the company and its subsidiaries;
- monitoring the application of the Corporate Code of Conduct and preparing reports on it, promoting the Code and its values, preparing proposals for the development of corporate culture, preventing and remedying the consequences of Code violations;
- reviewing submitted information and materials, giving recommendations on whether disciplinary action should be taken against employees who violate the Corporate Code of Conduct and rewarding the best performers;
- making decisions on whether company policies, procedures and local regulations may lead to violations of the Corporate Code of Conduct and require amendment;
- reviewing employee reports on conflicts of interest and advising on whether the conflict actually exists and further actions;
- reviewing and passing resolutions on cases of direct or functional subordination of employees to their close relatives;
- reviewing suggestions and recommendations for amendments to the Corporate Code of Conduct, as well as for improving corporate culture and employee engagement.

Due to the importance of matters under review, in July 2020, the Ethics Committee was reshuffled to include members of the company's Management Board. In October 2020, the new Committee held its first in-person meeting to review employee reports and the results of the first half of the year and to decide on the format of its future work

**47** reports  
received by the Ethics  
Committee

**22** reports  
led to identified  
violations of the  
Corporate Code  
of Conduct