

Annex to the Order
Limited Liability Company
Gas Transmission System Operator of
Ukraine
dated _____ No. _____

DISCUSSED

with employees of the Company
(according to the Protocol of the
constituent trade union conference of
the united trade union organization
«Gas Transmission System Operator of
Ukraine» dated 22.10.2019)

ANTI-CORRUPTION PROGRAM

of the Limited Liability Company

Gas Transmission System Operator of Ukraine

CONTENT OF THE PROGRAM

PREAMBLE	3
1. GENERAL PROVISIONS.....	4
2. PURPOSE AND OBJECTIVES OF THE PROGRAM	6
3. DIFINITION OF TERMS.....	6
4. RESPONSIBILITY OF PROGRAM IMPLEMENTATION.....	10
5. CORRUPTION ACT	10
6. ANTI-CORRUPTION MEASURES	11
7. NOTIFICATIONS	16
8. GIFTS AND BUSINESS HOSPITALITY	18
9. LEGAL STATUS OF AUTHORIZED OFFICER	18
10. PROCEDURE FOR REPORTING THE AUTHORIZED TO THE MANAGER OF THE COMPANY	23
11. PROCEDURES FOR THE PROTECTION OF EMPLOYEES WHO SUBMITTED A NOTIFICATION.....	23
12. PROGRAM CONTROL AND MONITORING	24
13. FINAL PROVISIONS	25

PREAMBLE

Anti-Corruption Program (hereinafter - the Program) of the Limited Liability Company Gas Transmission System Operator of Ukraine (hereinafter - the Company) declares zero tolerance principle to any forms of corruption and decision to take all legal measures to prevent, detect and combat corruption and related actions and expects all employees (authorized representatives) of the Company to respect this principle in their operations and in relations with counterparties (including potential counterparties) of the Company, public authorities and local governments, their officials, as well as other persons.

The Company declares its non-acceptance of corruption, welcomes the strict observance of the provisions of this Program by its counterparties (including potential counterparties) and other persons, and also supports to increase the level of anti-corruption culture among the Company's employees.

1. GENERAL PROVISIONS

1.1. The Program is a set of rules, standards and procedures for preventing, detecting and combating corruption in the Company.

1.2. The Program is approved by the CEO after its discussion with the employees of the Company and come into force by the order of the Company.

1.3. The Program defines the managerial and organizational principles of preventing, detecting and counteraction corruption in the Company, including anti-corruption measures, participants in such events, their tasks, functions, powers and responsibilities.

1.4. Prevention, detection and counteraction of corruption consists in the activities, within the competence of the persons specified in paragraph 1.6 of the Program, regarding:

prevention of corruption - identifying, studying, limiting or eliminating the causes of the occurrence and/or the spread of corruption (including acts of corruption, conditions that contribute to them);

anticorruption efforts - identification, suppression, disclosure and investigation of corruption acts;

localization and minimization (elimination) of the consequences of corruption.

1.5. Persons, responsible for implementation of the Program within their powers are:

company executive;

authorized officer;

employees.

1.6. The program is mandatory for the persons specified in clause 1.5 of the Program.

1.7. All employees, regardless of their position, are personally responsible for non-compliance or improper compliance with the requirements of this Program.

1.8. If there is sufficient information indicating signs of violation by employees of the requirements of the Program, the following measures shall be taken:

an official check or investigation is appointed in the prescribed manner in order to confirm or refute information about a probable violation;

employees who are found to have violated the requirements of the Program as a result of an official inspection or investigation may be subject to disciplinary, material and other liability in accordance with the Company's internal documents and legal requirements.

1.9. The facts of violations by employees of the requirements of the Program are decisive in resolving issues related to the transfer of such employees to higher positions.

1.10. The program is also used by the Company in its legal relations with counterparties, state authorities (local government).

1.11. The relevant provisions of the Program are mandatory for the authorized representatives of the Company if it is provided by any documents on the basis of which the authorized representatives of the Company carry out representation on behalf of the Company.

1.12. The relevant provisions of the Program are mandatory for the counterparties of the Company if it is provided by agreements to which the Company is a party (except for agreements, standard forms of which are approved in the prescribed manner).

1.13. The text of the Program is in permanent open access on the official website of the Company.

2. PURPOSE AND OBJECTIVES OF THE PROGRAM

2.1. The Program is developed to ensure that the Company acts in compliance with:

the requirements of anti-corruption legislation of Ukraine;

international regulations on prevention, detection and combating corruption (in case of application of such norms), including, but not limited to, where appropriate: OECD Anti-Bribery Convention;

international practices and standards of prevention, detection and combating corruption (if introduced by the Company).

2.2. The tasks of the Program are as follows:

development and introduction of effective mechanisms and procedures, as well as measures aimed at prevention, detection and combating corruption;

formation of high anti-corruption legal awareness among employees and raising the level of anti-corruption culture;

formation of a common understanding of the provisions of the Program among employees, authorized representatives and counterparties (including potential counterparties);

minimization (elimination) of the risks for the Company, its employees, authorized representatives and counterparties to be involved in corrupt activities.

3. DIFINITION OF TERMS

3.1. **Business hospitality** means business breakfasts, business lunches, dinners, refreshments, corporate, cultural, sports or other events in which, in order to establish or maintain business relations, as a guest participates:

counterparty (potential counterparty, other person) at the expense of the Company;

employee (authorized representative, a person performing representation on behalf of the Company on the basis of the contract) at the expense of contractors (potential contractors, other persons).

3.2. **Agreement** means agreement in the definition given in the Civil Code of Ukraine.

3.3. **Counterparty** means an individual or legal person who is a party to an agreement concluded by the Company.

3.4. **Corruption risk** means risk of committing Corrupt actions and/or violation of the requirements of the Program.

3.5. **Corrupt action** means action (inaction) defined in paragraph 5.1 of the Program, is considered forbidden for commission (admission) by an employee (authorized representative, counterparty) in connection with the performance of official duties (representative powers, contractual obligations).

3.6. **Message** means information about:

situation when there are sufficient grounds to believe that an act of corruption may be committed;

suspicion of committing an act of corruption;

cases of incitement to commit an act of corruption;

the occurrence of acts of corruption;

other cases related to corruption in the activities of the Company;

detection of signs of other violations of the requirements of the Program.

3.7. **Gift** means cash or other property, advantages, benefits, services, intangibles:

given (to be provided in the future) for free or at a below-market price counterparty (including potential counterparty) and other persons at the expense of the Company;

received (to be received in the future) for free or at a below-market price by employees (authorized representatives, persons performing representation on behalf of the Company on the basis of the agreement) from counterparties (potential counterparties) and other persons, during the performance of official duties (representative powers).

3.8. Potential counterparty means an individual or legal person with whom the Company plans to enter into an agreement (including in connection with the incentive, in accordance with the law, to enter into an agreement).

3.9. Potential conflict of interest means an employee's (authorized representative, a person performing representation on behalf of the Company on the basis of the agreement) private interest available in the in the field in which (s)he carries out his/her official duties (representative powers), which could affect the objectivity or impartiality of decisions taken by such employee or committing or non-committing acts to perform these duties (powers).

3.10. Employee means an individual who is in an labo relationship with the Company on the basis of an employment agreement (contract) and due to his/her work performs a labor function.

For the purposes of this Program, an employee is an individual who performs a labor function on the basis of a civil law agreement concluded with the Company.

3.11. Private interest means any property or non-property interest of an employee (authorized representative, a person performing representation on behalf of the Company on the basis of the agreement), including due to personal, family, friendship or other relations outside the performance of official duties (representative powers) with individuals or legal persons, including those arising from membership or activities in public, political, religious or other organizations.

3.12. **Offer (promise)** means a proposal (promise) to an employee (authorized representative, a person performing representation on behalf of the Company on the basis of the agreement) to provide him/her or a third party with Undue advantage for the commission or non-commission by the employee (authorized representative, a person performing representation on behalf of the Company on the basis of the agreement) any actions with the use of the granted rights and obligations in the framework of the employment relationship with the Company (performance of representative powers) in the interests of the person offering or promising such benefits, or in the interests of a third party.

3.13. **Actual conflict of interest** means a contradiction between the private interest of employee (authorized representative, a person performing representation on behalf of the Company on the basis of the agreement) and her/his official duties (representative powers) that affect the objectivity or impartiality of decisions taken by such employee or committing or non-committing acts to perform these duties (powers).

3.14. **Authorized officer** (head of the anti-corruption program, commissioner of the anti-corruption program) means an official of the Company responsible for the implementation of the Program, the legal status of which is determined by the Law of Ukraine “On Prevention of Corruption” (hereinafter - Law No. 1700-VII) and the Program.

3.15. **Authorized representative** means a person who is not in an employment relationship with the Company and, in accordance with the Civil Code of Ukraine, carries out representation on behalf of the Company (except in cases of representation arising under the contract).

3.16. Other terms in the Program are used in the meanings given in Law No. 1700-VII.

4. RESPONSIBILITY OF PROGRAM IMPLEMENTATION

4.1 The manager, employee, authorized representative, counterparty shall:

4.1.1) not commit or participate in Corrupt actions;

4.1.2) immediately inform authorized officer, CEO or founder (participant) of the Company about:

situation when there are sufficient grounds to believe that an act of corruption may be committed;

suspicion of committing an act of corruption;

cases of incitement to commit an act of corruption;

the occurrence of acts of corruption;

other cases related to corruption in the activities of the Company;

detection of signs of other violations of the requirements of the Program;

4.1.3) perform other duties stipulated by the Program.

5. CORRUPTION ACT

5.1. Corrupt acts are considered committed directly (personally) or indirectly (with the involvement or assistance of third parties), regardless of the purpose and in any form:

offer (promise);

acceptance of the offer (promises);

receipt by the employee (authorized representative, a person performing representation on behalf of the Company on the basis of the agreement) of undue advantage for himself/herself or a third party, as well as a request to provide such benefit for himself/herself or a third party;

granting an undue advantage to an employee (authorized representative, a person performing representation on behalf of the Company on the basis of the agreement) for committing or non-committing any actions using the granted rights and obligations under the employment relationship with the Company (performance of representative powers), in the interests of the person offering or promising such benefits, or in the interests of a third party;

abuse of power, that is intentional, in order to obtain Undue advantage for himself/herself or others, use by an employee (authorized representative, a person performing representation on behalf of the Company on the basis of the agreement) of his/her powers within the framework of labor relations with the Company (performance of representative powers), if it has caused substantial harm to legally protected interests of the Company, rights or interests of counterparties (including potential counterparties);

offer, promise or giving of Undue advantage to the person authorized to perform state functions, or at its request - to another person, by employee (authorized representative, a person performing representation on behalf of the Company on the basis of the agreement) directly or through third parties in connection with the performance of their official (representative) powers in the Company;

other actions performed by employee, authorized representative, counterparty treated as prohibited according to the Ukrainian legislation in combating corruption.

6. ANTI-CORRUPTION MEASURES

6.1. To perform effective identification, regular assessment and minimization (elimination) of corruption risks, the following anti-corruption (related to preventing, detecting and combating corruption) measures are taken:

6.1.1) control of representation expenses, giving and receiving gifts within the framework of official (representative) powers;

6.1.2) defining and implementing the procedure for resolving conflicts of interest;

6.1.3) inclusion of requirements for mandatory compliance with the relevant provisions of the Program to:

employment agreements (contracts) with employees;

documents on the basis of which the authorized representatives (authorized representative, a person performing representation on behalf of the Company on the basis of the agreement) perform representative powers, except as provided by law or cases determined by the CEO;

rules of internal labor regulations of the Company;

regulations on structural subdivisions of the Company;

agreements to which the Company is a party, except for agreements, the standard form of which is approved in the prescribed manner;

draft agreements to which the Company plans to be a party, except for agreements, the standard form of which is approved in the prescribed manner;

6.1.4) systematic improvement of standards and procedures for preventing, detecting and combating corruption;

6.1.5) periodic development and implementation of new standards and procedures for preventing, detecting and combating corruption;

6.1.6) implementation of a mechanism for submitting messages in compliance with the conditions of confidentiality of information;

6.1.7) monitoring the activities of employees (authorized representative, persons performing representation on behalf of the Company on the basis of the agreement), functions and business processes in the Company, directly related to corruption risks;

6.1.8) implementation of procedures for detection, analysis, assessment, minimization (elimination) of corruption risks related to the activities of counterparties);

6.1.9) analysis of draft internal documents of the Company and agreements to which the Company plans to be a party (except for agreements, the standard form of which is approved in the prescribed manner), in order to identify, analyze, assess, minimize (eliminate) corruption risks;

6.1.10) conducting regular assessment of corruption risks in the Company's activities in order to determine the functions, positions, business processes, activities directly related to corruption risks.

The assessment of corruption risks is carried out by the authorized person on a regular basis.

Based on the results of the corruption risk assessment, the authorized officer develops measures to manage corruption risks.

Authorized officer monitors the implementation of measures to manage corruption risks and informs the Company's management about the results;

6.1.11) monitoring compliance with the Program and the requirements of the Company's internal documents on detecting, preventing and combating corruption;

6.1.12) introduction of restrictions on the Company's support of political parties;

6.1.13) implementation of incentive measures for anti-corruption initiative of employees (authorized representative, persons performing representation on behalf of the Company on the basis of the agreement);

6.1.14) response to facts related to corruption;;

6.1.15) study of a potential counterparty.

The Company carries out the study of a potential counterparty until the conclusion of any agreements with it.

The structural subdivision of the Company is the initiator of concluding an agreement with a potential counterparty, which is obliged to make reasonable efforts to minimize (eliminate) the risk of establishing business relations with a potential counterparty, which may be involved in corruption. Therefore, employees of such a unit shall:

analyze the reputation of a potential counterparty for tolerance of corruption;

study the question of whether a potential counterparty has an anti-corruption program;

if necessary, check the documents received from the potential counterparty for compliance with the requirements of the legislation;

inform the potential counterparty about the content of the Program;

take into account the readiness (or refusal) of a potential counterparty to comply with the requirements of the Program, the legislation of Ukraine in the field of prevention and counteraction to corruption and to promote the prevention of corruption.

The Company has the right (except as provided by law) to contact a potential counterparty in order to obtain information in the form in accordance with Appendix 2 (3) to the Program, and refuse to establish contractual relations in the event:

failure to provide such information or providing inaccurate information;

there are reasonable doubts about the impeccability of his business reputation, which may lead to corruption;

6.1.16) study of the counterparty in the framework of prevention of corruption:

The Company may study the counterparty in the framework of preventing corruption.

The structural subdivision of the Company is the initiator of concluding an agreement with a potential counterparty, which is obliged to make reasonable efforts to minimize (eliminate) the risk of maintaining business relations with a potential counterparty, which may be involved in corruption. Therefore, employees of such a unit shall periodically analyze the reputation of the counterparty for tolerance to corruption.

The Company has the right (except in cases provided by law) to apply to the counterparty for information, in the form in accordance with Annex 2 (3) to the Program, and the counterparty is obliged to provide such information.

The Company has the right (except in cases provided by law):

apply penalties for non-fulfillment by the counterparty of contractual obligations to meet the requirements of the Program;

refuse to maintain business relations (including by terminating the relevant agreement) in the case of:

failure to provide such information or providing inaccurate information;

there are reasonable doubts about the impeccability of his business reputation, which may lead to corruption.

6.1.17) raising the level of anti-corruption culture and forming a high anti-corruption legal awareness among employees.

The Company promotes the level of anti-corruption culture and the formation of high anti-corruption awareness among employees by training and informing employees (if necessary - authorized representatives, persons performing representation on behalf of the Company under the agreement) the requirements of the Program and other aspects of detection, prevention and counteraction corruption, which, inter alia, includes:

publication of the Program on the official website of the Company;

conducting introductory briefings for new employees on preventing, detecting and combating corruption;

familiarization of employees with the Program (under personal signature), in the form in accordance with Annex 1 to the Program;

regular explanatory work (consultations on the application of the norms of the Program);

periodic organization and holding of relevant exercises, trainings, seminars, tests;

sending information on prevention corruption through corporate e-mail.

7. NOTIFICATIONS

7.1. Employees and other persons are guaranteed the confidentiality of the content of their notifications submitted to the authorized person, CEO or founder (participant) of the Company, except in cases:

non-compliance by such persons with the conditions of confidentiality of information;

provided by law.

7.2. The authorized officer, the CEO, the founder (participant) of the Company, are obliged not to disclose (except for the cases provided by the law) any information with the help of which it is possible to identify the person who submitted the notification.

This obligation also applies to other persons (who have become aware of this information), namely:

other employees;

authorized representatives;

counterparties.

7.3. The notification can be submitted orally, in writing, as well as through appropriate communication channels.

7.4. The notification may be submitted anonymously (without attribution). Such notification shall be considered if the information provided in it relates to a specific employee, authorized representative, counterparty (potential counterparty), contains factual data that can be verified.

7.5. Deliberately provision with a false notification is forbidden.

7.6. If the notification concerns the authorized officer, the CEO of the Company or said persons at the same time, such notification shall be sent to the person responsible for implementation of the anti-corruption program at the founder (participant) of the Company - the authorized person of the anti-corruption program subject to the conditions of confidentiality.

7.7. If the notification concerns a specific employee (except for the CEO, authorized officer), authorized representative, counterparty (potential counterparty) or several of these persons at the same time, verification of the notification, if there are grounds for its conduct, is carried out as part of an internal investigation (official investigation), initiated by the authorized officer.

In this case, the restrictions provided for in paragraph 7.2 of the Program do not apply to the transfer to the CEO, the authorized officer information, by means of which it is possible to identify the person who submitted the notification.

An official inspection (official investigation) is carried out only in cases where the notification concerns specific persons and contains factual data that can be verified.

The head of the working group for the official inspection (chairman of the commission for the official investigation) appoints the authorized officer.

Persons involved in conducting such an official inspection (official investigation) are obliged not to disclose any information that can be used to identify the person who submitted the notification, as well as the content of the notification.

The authorized officer shall inform the Company's management about the results of the inspection of the notification.

7.8. Systematic accounting of notifications, incidents related to corruption, measures taken, is conducted by the authorized officer.

7.9. If the employee, authorized representative, counterparty has submitted a notification in advance or deliberately refused to participate in the act of corruption, such a person may not be subject to appropriate penalties (sanctions).

7.10. No penalties (sanctions) may be applied to the employee, authorized representative, counterparty if his notification did not become the basis for the inspection.

8. GIFTS AND BUSINESS HOSPITALITY

8.1. The Code of *Corporate Ethics* of the Company sets restrictions on the value of the gift, business hospitality.

8.2. The restriction on the value of the gift does not apply to gifts received as public discounts on goods, services, winnings, prizes, rewards, bonuses.

9. LEGAL STATUS OF AUTHORIZED OFFICER

9.1. In order to implement the Program, a authorized officer is appointed by the CEO of the Company in accordance with the legislation.

9.2. An authorized officer may be an individual who is able to perform the relevant duties due to his/her business and moral qualities, professional level, state of health.

9.3. A person may not be appointed to the position of an authorized officer in the presence of the circumstances specified in part three of Article 64 of the Law No. 1700-VII.

9.4. The authorized officer is an employee of the Company. The status of the authorized officer is determined in accordance with the Law No. 1700-VII, internal documents of the Company, the Program.

9.5. In the event of the occurrence of circumstances of incompatibility, the authorized officer within two days from the date of occurrence of such circumstances is obliged to inform the CEO about above mentioned with the simultaneous submission of an application for termination of the employment contract on his own initiative.

9.6. The authorized officer may be dismissed early in the cases provided for in part five of Article 64 of Law No. 1700-VII.

9.7. The main tasks of the authorized officer are to prepare, ensure the implementation and control over the implementation of measures to prevent, detect and combat corruption in the Company.

9.8. The authorized officer is independent in his/her activity.

9.9. The authorized officer exercises his rights and responsibilities directly.

9.10. The authorized officer may involve other employees in the performance of his/her functions.

9.11. Interference in the activities of the authorized officer by the founder (participant), employees, authorized representatives, counterparties, as well as other persons outside their powers provided by law, charter, decisions of governing bodies or internal documents of the Company is prohibited (except as provided by law).

9.12. It is prohibited to impose on the authorized officer duties that do not belong to or go beyond his/her powers, limit the performance of his/her powers.

9.13. CEO of the Company is obliged:

to provide the authorized officer with proper material and organizational working conditions;

to assist the authorized officer in performing the functions provided by Law No. 1700-VII and the Program;

promptly respond to written and oral appeals, proposals and recommendations of the authorized officer provided by him/her within the implementation of the Program;

at the initiative of the authorized officer to send inquiries to public authorities, local governments, companies, institutions and organizations, regardless of ownership, in order to obtain from them the relevant information and materials necessary to perform the tasks assigned to the authorized officer.

9.14. The authorized officer to perform the tasks assigned to him/her is obliged:

perform his/her functions objectively and impartially;

organize the preparation of internal documents of the Company on the formation and implementation of the Program;

develop and submit for approval to the CEO of the Company's internal documents of the Company on matters specified in the Program;

ensure supervision, control and monitoring of compliance by employees and the CEO of the Law No. 1700-VII and the Program;

evaluate the results of the implementation of measures envisaged by the Program;

to ensure the preparation and submission to the CEO of a report on the status of implementation of the Program;

ensure cooperation with employees and other persons who in good faith report about possible facts of violation of the requirements of the Program, commission of corrupt or corruption-related acts;

ensure the preparation and submission to the CEO of proposals for inspections of compliance with the requirements of the Program;

participate in inspections in accordance with the Program;

participate in the periodic assessment of corruption risks;

ensure the systematic accounting of notifications, incidents related to corruption, response measures;

organize and participate in counterparties (potential counterparties) verification activities in accordance with the requirements of the Program;

carry out regular explanatory work (providing consultations on the application of the Program's norms);

participate in cooperation with public authorities, local governments, companies, institutions, organizations on issues identified by the Program;

organize the training activities to improve skills of employees on issues identified by the Program;

participate in recruitment procedures for the Company's personnel;

ensure the interaction and coordination between the between structural divisions of the Company in preparation, ensuring implementation and monitoring of actions to implement the Program;

perform other duties provided by the Law No. 1700-VII, the Program, the employment agreement.

9.15. In order to perform his/her tasks, the authorized officer is be entitled to:

receive from CEO, employees (authorized representative, persons performing representation on behalf of the Company on the basis of the agreement) written and oral explanations on matters relating to his/her powers;

receive from the structural divisions of the Company the information and duly certified copies of documents related to the Company's operations, including documents relating to the pursuing the procurement of goods, works or services, or participation in such procurement, etc.

If necessary, the authorized officer is given access to the originals of the relevant documents.

In cases of inexpediency of making a significant number of copies of documents, the originals of the relevant documents may be submitted to the authorized officer (by decision of the head of the unit), which must be returned within 10 working days from the date of completion of the event for which they were required;

obtain draft financial, organizational and regulatory documents, production documents, agreements in order to examine them for Corruption risks;

obtain access to storage facilities, production facilities of the Company, carry out stock count and control measures in such facilities;

obtain access to electronic data storage and processing databases, available in the Company and demand from the heads of the relevant structural subdivisions of the Company, if necessary, recording of relevant data on a hard copy;

initiate sending inquiries to state authorities, local authorities, enterprises, institutions and organizations of all forms of ownership for information and documents (duly certified copies of documents);

initiate the issue of bringing employees, CEO to responsibility, including dismissal from their positions in accordance with the law;

apply to the head of the Company regarding the implementation of its powers and responsibilities in accordance with the provisions of the Program;

perform other duties provided by the Law No. 1700-VII, the Program, the employment agreement and job description.

10. PROCEDURE FOR REPORTING THE AUTHORIZED TO THE MANAGER OF THE COMPANY

10.1. The authorized officer shall prepare a report on the results of the Program implementation at least once a year, by February 10, as well as at the request of the CEO, within a year within the period established by him (hereinafter - the Report).

The report should include information on:

the state of implementation of measures defined by the Program;

the results of the implementation of measures defined by the Program;

identified violations of the requirements of the Law No. 1700-VII, the Program, measures taken to eliminate such violations and the results of these measures;

the facts of obstruction of the proper performance of the authorized officer of his functions, establishment of unreasonable restrictions for him, cases of interference in his activities by third parties;

available suggestions and recommendations.

If necessary, the content of the submitted Report is additionally discussed by the authorized officer with the CEO.

11. PROCEDURES FOR THE PROTECTION OF EMPLOYEES WHO SUBMITTED A NOTIFICATION

11.1. The CEO and/or the authorized officer, within the limits of their powers, provide conditions for the protection of the person who provides assistance in

preventing, detecting and combating corruption in the Company (hereinafter - the exposer).

11.2. The exposer cannot be dismissed or forced to be dismissed, disciplined or subjected by the Company's management to other negative measures of influence (transfer, change of working conditions, refusal to appoint to a higher position, reduction of salary, etc.) or threat of such measures of influence in connection with the submission of the notification.

11.3 In case of leakage of confidential information about the exposer, the CEO, authorized officer at the request of such an employee or on his/her own initiative must immediately take sufficient measures to avoid negative consequences for the exposer associated with such leak.

11.4. Measures to protect the exposer are determined by the CEO together with the authorized officer and are implemented with the written consent of the employee.

12. PROGRAM CONTROL AND MONITORING

12.1. Control and monitoring of compliance with Program includes:

monitoring to ensure observance of the Program by employees, which is carried out on a regular basis by heads of structural units of the Company;

measures to control processes and procedures for the presence of Corruption risks which is carried out on a regular basis by heads of structural units of the Company;

monitoring of the implementation of the program at the Company carried out by the authorized officer;

regular review of Programs and related internal documents of the Company;

implementation of other anti-corruption measures initiated by the General Director of the Company.

13. FINAL PROVISIONS

13.1. This Program is an integral part of the internal labor rules of the Company.

13.2. This Program is termless and updated on regular basis to bring it into compliance with the requirements of the new anti-corruption legislation.

13.3. The provisions of this Program that are in conflict with those changes in legislation, shall not be applied.

13.4. If the provisions of the Program are in conflict with other internal documents, the provisions of the Program shall apply.

13.5. The initiator of the amendments to the Program may be authorized office, CEO, employee.

ANNEX 1
to Anti-Corruption Program
of the Limited Liability Company
Gas Transmission System Operator of Ukraine

**Obligation of compliance with Anti-Corruption Program
of the Limited Liability Company
Gas Transmission System Operator of Ukraine**

Full _____ name

Position _____

I have familiarized with and commit to follow the requirement and restrictions established by Anti-corruption Program of the Limited Liability Company Gas Transmission System Operator of Ukraine.

I have been notified that in case of incompliance with Anti-corruption Program of the Limited Liability Company Gas Transmission System Operator of Ukraine, I can be brought to disciplinary, civil, administrative and criminal responsibility according to the internal regulations of the Limited Liability Company Gas Transmission System Operator of Ukraine and Ukrainian legislation.

Date

Signature