

INTERPIPE ANTI-CORRUPTION POLICY



INTERPIPE

FUNDAMENTAL PRINCIPLES

Today, the fight against bribery, abuse of office, and misappropriation has become an integral part of Interpipe's corporate culture. Economic offenses in any form always harm both the operation and reputation of any company and contribute to the development of corruption. This policy was developed by the Interpipe Economic Security Service and sets goals and objectives for the Company in the field of countering bribery, abuse of office, and misappropriation. This is a document of the company-wide importance, and its effect extends to all companies and industrial assets of Interpipe.

This Policy concerns all cases of, or suspicions of, the aforementioned offenses, the commitment of which involves both Company employees and consultants, suppliers of products and services, or employees of contracting companies that collaborate with Interpipe.

All cases of commitment of such actions will be thoroughly investigated and carried through to their logical conclusion, including, if necessary, initiation of legal actions and institution of disciplinary or criminal proceedings. Neither record of service, nor positions of the suspected persons, or their relationship with the Company will be taken into consideration during the investigation process.

Provisions of this document apply to all employees of the Company and are mandatory for use in their activities by managers of all enterprises and operational divisions.

DEFINITION OF BRIBE-TAKING, ABUSE OF OFFICIAL POSITION, AND MISAPPROPRIATION CONCEPTS:



Acceptance of a bribe (Article 368 of the Criminal Code of Ukraine). Acceptance of a bribe, as well as of a significant bribe, by a public officer for fulfillment or non-fulfillment of requirements of a briber, or in the interests of the third parties, with the use of the official position, shall inflict a fine, ranging from one thousand to four thousand non-taxable minimum incomes of citizens, or arrest for a period from three to six months, or imprisonment for a term of two to six years, with deprivation of the right to hold certain positions for up to three years.

If the subject of such a case was bribery on a major scale, or if the act was committed by an official in a position of responsibility, or upon a preliminary collusion by a group of persons, or repeatedly, or was accompanied with extortion of a bribe, then such an act shall be punishable by the deprivation of liberty for a term of five to ten years with the deprivation of the right to hold certain positions or be engaged in certain activities for up to three years with asset forfeiture.

Acceptance of a bribe in an especially large amount by a person who occupies a certain official position, or upon a preliminary collusion by a group of persons, shall be punishable by the deprivation of liberty for a term of eight to twelve years with the deprivation of the right to hold certain positions or be engaged in certain activities for a period of up to three years with asset forfeiture.

Note. A bribe in a significant amount is considered to be the one that is a hundred or more times higher than the non-taxable minimum income of citizens; a bribe on a major scale is the one that is two hundred or more times higher than the non-taxable minimum income of citizens; while a bribe in an especially large amount is the one that exceeds the non-taxable minimum income of citizens by five hundred or more times.

Offering or giving a bribe (Article 369 of the Criminal Code of Ukraine). Offering or giving a bribe shall be punishable by a fine of one thousand to four thousand non-taxable minimum incomes of citizens, or the restriction of liberty for a term of two to four years, or the deprivation of liberty for the same term.

If the act was committed repeatedly, or if a bribe was given to an official who occupies a certain official position, or if the act was committed upon a preliminary collusion by a group of persons, then such an act shall be punishable by the deprivation of liberty for a term of three to ten years with a fine of five hundred to one thousand non-taxable minimum incomes of citizens, with or without asset forfeiture.

Abuse of official position (Article 364 of the Criminal Code of Ukraine) is the deliberate use, by an official and for mercenary motives or for other for self-serving interests, of his or her power or official position contrary to the interests of the service, if it has caused harm to the legally protected rights, freedoms, and interests of individual citizens or state or public interests, or the interests of legal entities, and shall be punishable by the arrest for up to six months, or the restriction of liberty for up to three years, or the deprivation of liberty for the same period, with the deprivation of the right to hold certain positions or be engaged in certain activities for up to three years, and with a fine of two hundred and fifty to seven hundred and fifty non-taxable minimum incomes of citizens.

The same action, if it resulted in serious consequences, shall be punishable by the deprivation of liberty for a term of three to six years, with the deprivation of the right to hold certain positions or be engaged in certain activities for a term of up to three years, and with a fine of five hundred to one thousand non-taxable minimum incomes of citizens.

Misappropriation (Articles 185-198 of the Criminal Code of Ukraine) is an unlawful, gratuitous seizure and / or reversion of someone else's property in favor of the culprit or other persons, committed for mercenary motives, causing damage to the owner of this property. There are several types of misappropriation: theft, fraud, embezzlement, wasteful spending, and others – all of them, depending on the amount of misappropriation, shall be punishable with fines, compulsory community service or correctional labor, or the arrest for up to six months, the restriction or deprivation of liberty for up to 15 years, with or without asset forfeiture.



RESPONSIBILITY

Every employee shall consider Company's interest above his/her own ones and shall avoid conclusion of any deals, which may have any detrimental effect on the Company's interests and relationship with strategic partners and contractors. Employees of the Company shall advise ESS about their suspicions or provide all data, obtained from other persons, on all potential economic misdeeds, committed by a public officer or employee of the Company, supplier or any other parties, related in any way to Interpipe.

Such information may be delivered through any of the channels, mentioned below:

- To their immediate manager
- To Company Director
- To employees of the Economic Security Service

In the course of investigation employees of the Company Economic Security Service will get a free and unobstructed access to all documents and facilities of the Company. They will also get the right, within the extent of their investigation, to examine and to copy, fully or partially, the documents, kept in folders, work tables, or other storing places at Company's facilities.

ESS employees will treat all information obtained as confidential and will protect the reputation of all parties concerned.

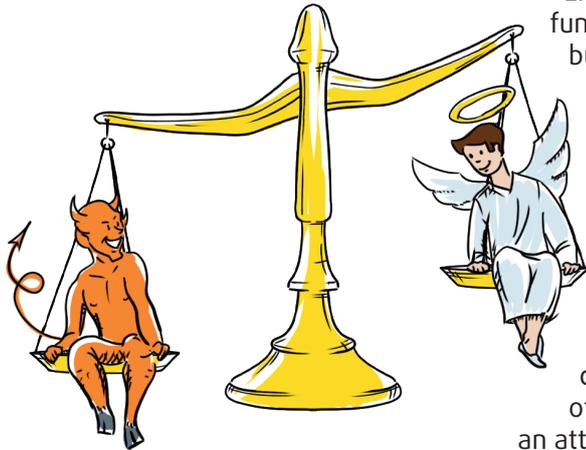
Any employee of the Company, caught in misappropriation, abuse of official position, bribe-taking, or other unlawful actions, shall be fired regardless of the amount of damage, the fact of repayment of the damage caused, and his/her hierarchy level.



CONFLICT OF INTERESTS

To avoid any conflict of interests, all employees shall always act in the Company's interests and shall be able to recognize situations, when personal interests are in conflict with Company's interests. In addition to that, all employees shall not disclose any information, obtained from partners and contractors on a confidential basis, and shall not use such information for their own benefit or to the advantage of other partners or contractors.

In case of occurrence of any circumstances, which, in the opinion of an employee, may lead to a conflict of interests, he/she is obliged to urgently inform the Economic Security Service and his/her immediate manager about such circumstances.



Employees are not allowed to use resources and funds of the Company for development of their own business, to suit their own ends, or to earn any profits.

It is strictly prohibited for employees and their families to accept any forms of illegal payments, "kickbacks", or compensation payments from customers both in cash and in products and services.

Any failure to provide information about any conflict of interests or any insufficient disclosure of such information shall be considered by ESS as an attempt to hide such information.

GIFTS

It is prohibited for employees and their immediate relatives to accept, from customers, any kinds of compensations, loans (with the exception of loans from financial institutions, given on standard terms and conditions), gifts, or invitations for entertainment or any other services, which are not just a token of friendship or attention, which such employee could not pay for within the bounds of his/her current expenses.

Acceptance of any gifts or invitations for any entertainment, which may affect the employee's judgment, shall not be allowed under any circumstances. Employees shall not acquire any interest or benefit from any customer, which may urge them to give any preferences to such customer.



REPRESENTATION COSTS

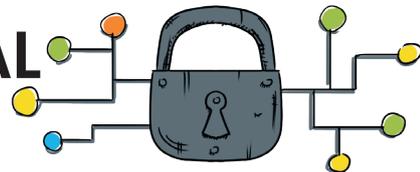
Any gifts and representation costs, including business hospitality expenses, which Employees on behalf of the Company may provide to other persons and organizations, or which Employees, in connection with their work at the Company, may receive from other persons and organizations, must correspond to the aggregate of the five criteria indicated below and shall:

- Be directly related to the legitimate goals of the Company's activities – for example, with the presentation or completion of business projects, successful execution of contracts, or with generally accepted holidays such as Christmas, the New Year, and International Women's Day, as well as memorable dates and anniversaries;
- Be reasonable, proportionate and do not represent articles of luxury;
- Not represent a hidden reward for a service, action, omission, connivance, patronage, granting rights, making a certain decision on a transaction, agreement, license, permission, etc., or an attempt to influence the recipient for another illegal or unethical purpose;
- Not create a reputational risk for the Company, Employees, and other persons in the event of disclosure of information about gifts or representation costs; and
- Not contradict the principles and requirements of this Policy, other internal documents of the Company, and the norms of the applicable laws.

Any gifts to third parties, on behalf of the Company, its Employees, and representatives, in the form of monetary funds, cash or non-cash, and in any currency shall be forbidden.

If an employee has doubts about the appropriateness of his or her actions required to perform certain operations, he or she should contact the ESS of the Company or his or her immediate supervisor for the resolution of this issue.

PROCEDURE FOR ASSESSING POTENTIALLY RISKY FINANCIAL OPERATIONS



Interpipe employees responsible for conducting the assessment of potentially risky transactions (including the purchase of gifts and representation costs) shall carefully consider each financial transaction and take all necessary measures to ensure that it does not violate this Policy. Single gifts and representation costs, the value of which does not exceed 100 euros, are not subject to such an assessment procedure.

In addition to the indicator of the cost of products in the process of assessing potentially risky financial transactions, the following characteristics shall be also taken into consideration:

- Motive – whether the motive for the performance of the financial transaction under assessment is clear and whether it complies with the requirements of this Policy;
- Proportionality – whether the amount of the financial transaction corresponds to the motive for its performance, as well as to the level of the official position of the employee who performs such an operation;
- Legality – whether a violation of the national legislation, as well as of the legislation in the region of residence of a counterparty or a third party (if applicable), has been identified in the event of such a financial transaction;
- Frequency and periodicity – whether similar financial transactions have been carried out earlier and whether such fact raises additional suspicions with respect to such a financial transaction; and
- Transparency – whether it is possible to allow open dissemination of information about such a financial transaction.

A decision whether to carry out the potentially risky financial transactions or to reject them shall be made based on the results of the procedure of their assessment.

VERIFICATION OF COUNTERPARTIES



The Company makes reasonable efforts to minimize the risk of business relationships with counterparties who have been, or may be, involved in corrupt activities, for which the counterparties' tolerance to bribery is assessed, including the verification of the fact that they have their own anti-corruption procedures or policies, as well as of their willingness to comply with the requirements of this Policy, to include anti-corruption clauses in contracts, and to render mutual assistance for the ethical business conduct and prevention of corruption.

In relations with its counterparties and in case of any participation in a joint venture, company, or association, the Company:

- Checks its counterparties for their trustworthiness and affiliation with government officials (through close relatives or otherwise) and state-owned companies and institutions, and also analyzes information about the reputation of potential partners and participants and their tolerance to corruption;
- Informs the counterparties about the principles of this Policy before formalizing business relations with them, making this Policy freely available; and
- Advocates for the adoption of a similar anti-corruption Policy at a joint venture, company, or association.

PAYMENTS THROUGH INTERMEDIARIES OR IN FAVOR OF THIRD PARTIES

It is prohibited for the Company and its Employees to engage or use agents, intermediaries, partners, joint ventures, or other persons for the performance of any actions that are contrary to the principles and requirements of this Policy or the norms of the applicable anti-corruption laws.

In order to minimize and suppress the risks of the Company's involvement in corruption activities, a procedure is carried out to check agents, intermediaries, and other third parties for their trustworthiness and affiliation with government officials and state-owned companies and institutions.

PARTICIPATION IN POLITICAL AND CHARITABLE ACTIVITIES AND SPONSORSHIP

The Company does not finance any political parties, organizations, or movements, as well as any charitable or sponsorship projects in order to obtain any commercial advantages.

INTERACTION WITH GOVERNMENT OFFICERS AND AUTHORITIES

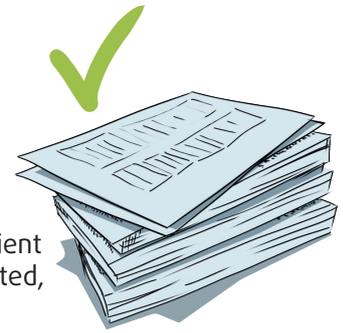
The Company refrains from paying any expenses for Ukrainian and foreign government officials and their close relatives (or in their interests) in order to obtain any commercial advantages in specific projects of the Company, including expenses for transportation, accommodation, food, entertainment, PR campaigns, etc., or in order for them to obtain other benefits at the expense of the Company.

The interaction of the Company, as well as of managers and employees of companies and industrial assets, with law enforcement agencies and regulatory bodies, other state authorities, and municipal authorities and their representatives, as well as with non-governmental organizations and their representatives, is carried out strictly within the framework of the legislation currently in force.

PUBLIC RELATIONS

All public relations activities of the Company are aimed solely at improving the image and business reputation of the Company and must be directly related to the business activities of companies and industrial assets.

MAINTENANCE OF ACCOUNTING BOOKS AND RECORDS



All financial transactions must be accurately, correctly, and with a sufficient level of detail reflected in the accounting records of the Company, documented, and available for verification.

The Company has appointed employees who are personally responsible for the preparation and provision of complete and reliable financial statements within the time frame established by the applicable laws.

Financial transactions containing aggravated corruption risks, including those accompanying the interaction with government agencies, employees, and their affiliates, charitable and political contributions, sponsorship payments, gifts, travel expenses and representation costs, etc. are reflected in the Company's accounting records with the maximum level of detail.

Any distortion or falsification of the Company's accounting records is strictly prohibited.

RISK ASSESSMENT AND ANTI-CORRUPTION PROCEDURES

The Company identifies and periodically updates indicators of the corruption risks, specific to its activities and potentially vulnerable business processes. The Company also develops and implements adequate procedures for the prevention of corruption, which reasonably match the identified risks, and monitors their observance.

AUDIT AND CONTROL

The Company conducts, on a regular basis, internal and external audits of financial and economic activities, carries out the verification of the completeness and correctness of data display in the accounting records, and checks the compliance with the requirements of the applicable laws and internal regulations of the Company, including the principles and requirements established by this Policy.

As part of the internal control procedures, the Company conducts inspections on the performance of the key business processes, including random checks of the legality of payments to be made, their economic feasibility, and expediency of expenses, including for the purpose of confirmation by primary accounting documents and compliance with the requirements of this Policy.

PROVISION OF INFORMATION

The Company makes this Policy freely available on the corporate Internet site, openly declares its zero tolerance to corruption, welcomes and encourages the adherence to the principles and requirements of this Policy by all counterparties, its Employees and other persons, and contributes to the enhancement of the general level of the anti-corruption culture by information sharing.

EMPLOYEE INVOLVEMENT IN COUNTERING CORRUPTION

The Company sets as its task the formation of the employees' personal position of zero tolerance to corruption in any of its forms and manifestations. To this end, the Company takes all necessary measures to implement the present Policy at all levels of the organization and to bring its content to the attention of its employees and stakeholders.

Employees' compliance with the principles and requirements of this Policy is taken into consideration when forming a talent pool for promotion to higher positions, as well as when imposing disciplinary sanctions.

WAIVER OF RETALIATION MEASURES AND SANCTIONS

The Company protects the interests of employees who in good faith reported (including on condition of anonymity) about the facts of misappropriation, wasteful spending, fraud, bribery, commercial bribery, conflict of interest, and other offenses at the Company, as well as the interests of employees who refused to commit such offenses or participate in their commitment as an intermediary.

No disciplinary sanctions may be applied to such employees for the above reasons.

FIGHT AGAINST ECONOMIC OFFENSES AT INTERPIPE

Interpipe Economic Security Service is responsible for development and implementation of efficient policies for prevention and identification of economic crimes and offences.

Interpipe Economic Security Service has developed and launched a system for anonymous notification about suspicions of bribe-taking, abuse of official position, and misappropriation for employees, customers, and partners (hot-line services, provision of information at the corporate website and by electronic mail).

Economic Security Service Hotline numbers (for notice of suspicion of corruption):

+38 (067) 622 93 88, +38 (067) 563 96 31

Economic Security Service Director direct number: +38 (056) 74 74 070

Helpline email of Economic Security Service: antifraud@interpipe.biz

A single alert line (for any questions, including ethics):

+38 (067) 622 56 10

A single alert email: compliance@m.interpipe.biz

A single website notification form:

https://interpipe.biz/en/esg/governance_and_ethics/trust_line

Any report, sent via any of the aforementioned resources, is not an accusation, but just a suspicion.

