

MEMORANDUM

on anti-bribery procedures for Vnesheconombank's employees

This Memorandum has been developed to avoid and prevent corrupt practices involving Vnesheconombank's employees that may arise from their official duties.

Anti-bribery measures include activities of the federal bodies, government authorities of constituent entities of the Russian Federation, local government authorities, civil society institutions, organisations and physical entities acting within their powers aimed at:

- a) preventing corruption, including detection and subsequent removal of causes for corruption (preventive measures);
- b) preventing, avoiding, terminating, discovering and investigating offences of corruption (anti-corruption measures);
- c) minimising and/or eliminating the consequences of offences of corruption (Article 1(2) of the Federal Law on Counteracting Corruption No. 273-FZ dated 25 December 2008).

CORRUPTION

Corruption means abuse of rank, bribery, abuse of powers, commercial bribery or other unlawful use by individuals of their official position contrary to the legitimate interests of society and the state for the purpose of profiting in the form of money, valuables, other property or services of a pecuniary nature, property rights for oneself or for third parties or illegally providing such benefits to an individual, acting as above for or on behalf of a legal entity (Article 1 of Federal Law On Counteracting Corruption No. 273-FZ dated 25 December 2008).

Corruption may take, inter alia, the form of bribery and commercial bribery.

BRIBERY AND COMMERCIAL BRIBERY

Outright bribe is a bribe given to an official in an effort to cause the person to take a particular action immediately or in the future.

Veiled bribe is a situation where the briber and the person accepting the bribe disguise their joint unlawful actions as legitimate behaviour. In this case, the briber may not necessarily make direct claims (requests), for instance, to secure patronage.

Deferred bribe is systematic receipt of bribes by an official in the form of regular deductions from the profit (income) of a bribing entrepreneur (legal entity), where the person accepting the bribe each time carries out new actions for the briber or provides patronage or connivance.

Commercial bribery is unlawful giving of money, securities or other property to a person empowered to exercise executive functions in a commercial or other organisation and unlawful rendering of services of a pecuniary nature or providing other property rights

(including where such person instructs to transfer property, render services of a pecuniary nature or property rights are provided to other individuals or legal entities) in exchange for actions (omission to act) for the briber or other persons, if such actions (omission) are within official powers of this person or this person is in a position to facilitate such actions (omission) (Article 204 of the RF Criminal Code).

A person empowered to exercise executive functions in a commercial or other organisation as well as in a non-commercial organisation which is not a governmental authority, local authority or a public or municipal institution is a person with functions of a sole executive body, member of collegiate executive body or a person carrying out executive or administrative functions in these organisations on a permanent, temporary basis or subject to special authorisation (Article 201 of the RF Criminal Code).

Bribery (Articles 290, 291, 291(1) and 291(2) of the RF Criminal Code) and **commercial bribery** (Articles 204, 204(1) and 204(2) of the RF Criminal Code) may involve not only money, securities or other property, but also unlawful provision of services of a pecuniary nature and property rights.

The unlawful provision of services of a pecuniary nature shall be construed as a bribe to a public official of pecuniary benefits, including release from property obligations (for example, provision of loans at reduced interest rates, granting travel tours for free or at a reduced price, flat renovation, construction of a holiday cottage, transfer of property, including, inter alia, cars for temporary use, debt forgiveness or discharge of obligations to others) (paragraph 9 of Resolution No. 24 of the Plenum of the Supreme Court of the Russian Federation dated 09 July 2013 “On court practice relating to bribery cases and other corruption offences” (the “Resolution No. 24 of the Plenum of the Supreme Court of the Russian Federation dated 09 July 2013)).

Property rights include both right in property, including both the lender's right of claim and other monetary rights, for example, exclusive rights for intellectual products and equivalent means of identification (Article 1225 of the RF Civil Code). As a result of bribery in the form of unlawful provision to an official of property rights, a person receives a legal opportunity to take possession or dispose of property of others as if it were their own, require the debtor to fulfil property obligations etc. (paragraph 9 of Resolution No. 24 of the Plenum of the Supreme Court of the Russian Federation dated 09 July 2013).

The person receiving the bribe may include only officials.

Officials are the persons carrying out functions of public authorities or executive or administrative functions with governmental bodies, local authorities, public and municipal institutions, state corporations, public companies state and municipal unitary enterprises, joint stock companies controlled by the Russian Federation, constituent entities of the Russian Federation or municipal authorities as well as in the Armed Forces of the Russian Federation, other military formations and units of the Russian Federation (Article 285 of the RF Criminal Code).

The executive functions shall be construed as powers of an official relating to management of personnel in a state corporation (or its structural subdivision) or subordinated employees including staffing and determining of job duties, incentive and remuneration, disciplinary measures etc.

The executive functions include powers to take decisions having legal value and leading to certain legal circumstances (paragraph 4 of Resolution of the Plenum of the Supreme Court of the Russian Federation No. 19 dated 16 October 2009 “On court practice relating to abuse and misuse of power”).

The administrative functions include powers of an official to manage and dispose of property and/or money on the books and/or bank accounts of organisations, institutions, military bases and subdivisions as well as to carry out other actions (for example, to take decisions on payment of salary, bonuses, control over flow of tangible assets, determination of the procedure for storing, accounting for and managing tangible assets) (paragraph 5 of Resolution of the Plenum of the Supreme Court of the Russian Federation No. 19 dated 16 October 2009 “On court practice relating to abuse and misuse of power”).

Accepting a bribe means receiving by an official, foreign official or an official from a public international organisation, personally or through intermediaries of a bribe in the form of money, securities, other property or in the form of unlawful provision of services of a pecuniary nature, provision of other property rights (including where an official instructs to give a bribe to other individuals or legal entities) in exchange for certain actions (omission to act) for the briber or his/her representatives, if such actions (omission) are within official powers of this person or this person is in a position to facilitate such actions (omission), as well as for overall patronage or connivance in office (Article 290 of the RF Criminal Code).

Overall patronage may refer, inter alia, to unjustified appointment of a subordinate to a higher graded post, including in breach of the established procedure, or adding a subordinate to a list of persons eligible for incentive payments.

Connivance in office includes, inter alia, a consent of an official from a controlling authority not to impose sanctions within his/her powers in the event that an offence committed by the briber is discovered.

Actions (omission) relating to overall patronage or connivance in office may be committed by an official both in respect of subordinates and other persons under his/her supervision, control or within other functions of public authorities as well as his/her executive functions (paragraph 5 of Resolution No. 24 of the Plenum of the Supreme Court of the Russian Federation dated 09 July 2013).

Abetment to committing actions (omission to act) for the briber or his/her representatives by a official in abuse of his/her position include the use by the the person accepting the bribe of his/her authority and other opportunities within his/her position to exert influence on other officials so that they commit the required actions (omission to act) in office. Such influence shall be deemed to comprise efforts to induce other officials to commit the required actions (omission to act) through persuasion, promises, coercion etc. (paragraph 4 of Resolution No. 24 of the Plenum of the Supreme Court of the Russian Federation dated 09 July 2013).

Extortion (Article 290(5)(b) of the RF Civil Code) **or provocation of a commercial bribe** (Article

204(7)(b) of the Criminal Code of the Russian Federation) shall be construed not only as a demand by an official or a person empowered to exercise executive functions in a commercial or other organisation to give a bribe or transfer unlawful compensation committing commercial bribery involving threat to commit actions (omission) that may impair legitimate interests of a person, but also deliberate creation of conditions forcing a person to transfer the above to avoid negative effects on his/her legitimate interests.

Receiving valuables by an official or a person empowered to exercise executive functions in a commercial or other organisation for committing actions (omission to act) within his/her powers or using his/her position shall be *qualified as bribery or commercial bribery regardless of his/her intention to commit such actions (omission)*.

If such person receives anything valuable for actions (omission) which he/she is unable to commit due to the absence of relevant powers and impossibility to use his/her position, such actions, if committed deliberately for the purpose of acquiring valuables, shall be qualified as fraud committed as a result of misuse of position.

Actions of a person who received valuables in order to allegedly give them to an official or a person empowered to exercise executive functions in a commercial or other organisation, as a bribe or commercial bribe, but deliberately did not intent to keep his/her promise and converted such valuables to his/her own use constitutes fraud. The person who received the valuables as described above shall be liable for attempted bribery or commercial bribery (paragraph 24 of Resolution No. 24 of the Plenum of the Supreme Court of the Russian Federation dated 09 July 2013).

If property benefits in the form of money, other valuables or tangible services are provided to relatives and family members of an official with his/her consent or if he/she did not object against it and used its powers for the benefit of the briber, the actions of such official shall be qualified as bribery.

According to Article 30(3) of the RF Criminal Code, deliberate actions (omission to act) of a person directly aimed at committing a crime shall be regarded as attempted crime, even if the crime was not accomplished for reasons outside of such person's control.

Therefore, deliberate actions (omission) of a person directly aimed at giving a bribe shall be regarded as attempted bribery, even if the bribe was not given for reason's outside of such person's control.

Deliberate actions (omission) of an official directly aimed at receiving a bribe shall be regarded as attempted acceptance of a bribe, even if the bribe was not received for reason's outside of such person's control.

Liability applies to accepting, giving or facilitating bribes whether an official accepts the bribe before or after he/she commits actions (omission) in favour of the briber or his/her

representatives and whether such actions (omission) were induced by a bribe or bribery arrangement with an official (paragraph 8 of Resolution No. 24 of the Plenum of the Supreme Court of the Russian Federation dated 09 July 2013).

BRIBERY OR CORRUPT PAYMENTS THROUGH INTERMEDIARIES

Bribes are often taken and given through intermediaries – subordinates, employees, external companies, transaction partners, and contractors – who are qualified as aiders by the RF Criminal Code. Commercial bribery may also be effected through intermediaries.

According to Article 291(1) of the RF Criminal Code, bribery through intermediaries means direct giving of bribes on behalf of the briber or the bribe recipient or otherwise assisting the briber and/or bribe recipient in achieving or implementing a bribery arrangement between them.

As provided for by Article 204(1) of the RF Criminal Code, commercial bribery through intermediaries means a direct transfer of corrupt payments (unlawful compensation) on behalf of a person transferring corrupt payments or a person receiving corrupt payments or assistance to such persons in achieving or otherwise implementing a commercial bribery arrangement on an especially large scale.

Another example of corruption is unlawful compensation on behalf of a legal entity.

UNLAWFUL COMPENSATION ON BEHALF OF A LEGAL ENTITY

Unlawful compensation on behalf of a legal entity means an unlawful transfer, offer or promise, for or on behalf a legal entity to an official, a person empowered to exercise executive functions in a commercial or other organisation, a foreign official or an official from a public international organisation, of money, securities or other property or provision of services of a pecuniary nature or property rights in exchange for actions (omission to act) for such legal entity by an official, a person empowered to exercise executive functions in a commercial or other organisation, a foreign official or an official from a public international organisation within their official powers of this person or this person is in a position to facilitate such actions (omission) relating to his/her official position (Article 19(28) of the RF Code on Administrative Offences).

SANCTIONS FOR BRIBERY, COMMERCIAL BRIBERY, BRIBERY THROUGH INTERMEDIARIES, UNLAWFUL COMPENSATION ON BEHALF OF A LEGAL ENTITY

Receipt of a bribe (Article 290 of the RF Criminal Code)

1. Receipt by an official, foreign official or an official from a public international organisation, personally or through intermediaries of a bribe in the form of money, securities, other property or in the form of unlawful provision of services of a pecuniary nature, provision of other property rights (including where an official instructs to give a bribe to other individuals or legal entities) in exchange for certain actions (omission to act) for the briber or his/her representatives, if such actions (omission) are within official powers of this person or this person is in a position to facilitate such actions (omission), as well as for overall patronage or connivance in office, shall be punishable by a fine of up to RUB 1 million or two months' wages or other income of a convict or a fine of up to 10 to 50-fold amount of the bribe and deprivation of the right to hold a particular position or engage in a certain type of activity for a period of up to three years or by corrective work for one to two years and deprivation of the right to hold a particular position or engage in a certain type of activity for a period of up to three years or by

community service for up to five years and deprivation of the right to hold a particular position or engage in a certain type of activity for a period of up to three years or by imprisonment for up to three years with or without a fine of 10 to 20-fold amount of a bribe or w/o the fine.

2. Receipt by an official, foreign official or an official representing a public international organisation of a bribe in a significant amount shall be punishable by a fine in the amount from two hundred thousand to one million five hundred thousand rubles, or in the amount of the wage or other income of the convicted person for a period of six months to two years, or in the amount of up to 30 to 60-fold amount of the bribe with the deprivation of the right to hold a particular position or engage in a certain type of activity for a period of up to three years or by imprisonment for up to six years with or without a fine of up to 30-fold amount of the bribe and with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to three years.

3. Receipt by an official, a foreign official or an official from a public international organization of a bribe for illegal actions (inaction) shall be punishable by a fine in the amount from five hundred thousand to two million rubles, or in the amount of the wage or other income of the convicted person for a period from six months to two years, or in the amount up to 40 to 70-fold amount of the bribe with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to five years, or by imprisonment for a term of three to eight years with or without a fine of up to 40-fold amount of a bribe or with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to five years.

4. Actions provided for by parts 1 – 3 of this article committed by a person holding a public position of the Russian Federation or a public position of a constituent entity of the Russian Federation or a head of a local government body shall be punishable by a fine in the amount of one million to three million rubles, or in the amount of the wages or other income of the convicted person for a period of one to three years, or in the amount of up to 60 to 80-fold amount of a bribe with the deprivation of the right to hold a particular position or engage in a certain type of activities for up to seven years or by imprisonment for a term of five to ten years with or without a fine of up to 50-fold amount of a bribe or and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to seven years.

5. Actions provided for by parts 1, 3, 5 of this article, if committed:

- a) by a group of persons in collusion or by an organized group;
- b) with extortion of a bribe;
- c) on a major scale,

shall be punishable by a fine in the amount of two million to four million rubles, or in the amount of the wages or other income of the convicted person for a period of two to four years, or in the amount of up to 70 to 90-fold amount of a bribe with the deprivation of the right to hold a particular positions or engage in a certain type of activity for up to ten years or by imprisonment for a term of seven to twelve years with or without a fine of up to 60-fold amount of a bribe or and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to ten years.

6. Actions provided for by parts 1, 3, 4 of this article, items “a” and “b” of part 5 of this article, committed on an especially large scale shall be punishable by a fine in the amount of three million to five million rubles, or in the amount of the wages or other income of the convicted person for a period of three to five years, or in the amount of up to 80 to 100-fold amount of the bribe with the deprivation of the right to hold a particular positions or engage in a certain type of activities for up to fifteen years or by imprisonment for a term of eight to fifteen years with or without a fine of up to 70-fold amount of a bribe or and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to fifteen years.

Notes.

1. The significant amount of a bribe in this article, articles 291 and 291.1 of the Criminal Code of the Russian Federation is the amount of money, the value of securities, other property, property-related services, other property rights exceeding twenty-five thousand rubles, large amount of bribes – the one exceeding one hundred fifty thousand rubles, especially large amount of bribes – the one exceeding one million rubles.

2. A foreign official in this article, articles 291, 291.1 and 304 of the Criminal Code of the Russian Federation shall refer to any person appointed or elected holding a position in the legislative, executive, administrative or judicial authority of a foreign state and any person performing any public function for a foreign state, including for a public agency or a public enterprise; an official of an international public organization shall refer to an international civil servant or any person authorized by such an organization to act on its behalf.

Giving a bribe (Article 291 of the Criminal Code of the Russian Federation)

1. Giving a bribe to an official, a foreign official or an official of an international public organization in person or through an intermediary (including when a bribe upon the instruction of an official is transferred to another private individual or a legal entity) shall be punishable by a fine of up to five hundred thousand rubles, or in the amount of wages or other income of the convicted person for up to one year, or in the amount of up to 5 to 30-fold amount of a bribe, or correctional labor for up to two years, with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to three years, or by forced labor for up to three years, or by imprisonment for up to two years with or without a fine in the amount of 5 to 10-fold amount of the bribe.

2. Giving a bribe to an official, a foreign official or an official of an international public organization in person or through an intermediary (including when a bribe upon the instruction of an official is transferred to another private individual or a legal entity) in the significant amount shall be punishable by a fine of up to one million rubles, or in the amount of wages or other income of the convicted person for up to two years, or in the amount of up to 10 to 40-fold amount of a bribe, or correctional labor for up to one to two years, with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to one to three years, or by forced labor for up to five years, or by imprisonment for up to five years with or without a fine in the amount of 5 to 15-fold amount of the bribe.

3. Giving a bribe to an official, a foreign official or an official of an international public organization in person or through an intermediary (including when a bribe upon the instruction of an official is transferred to another private individual or a legal entity) for acts known to be illegal (omission to act) in the significant amount shall be punishable by a fine of up to one million five hundred thousand rubles, or in the amount of wages or other income of the convicted person for up to two years, or in the amount of up to 30 to 60-fold amount of a bribe, or correctional labor for up to one to two years, with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to five years, or by forced labor for up to five years, or by imprisonment for up to eight years with or without a fine in the amount of up to 30-fold amount of the bribe and with the deprivation of the right to hold particular positions or engage in a certain type of activity for up to five years.

4. Actions provided for by parts 1 – 3 of this article, if committed:

- a) by a group of persons in collision or by an organized group;
- b) on a major scale,

shall be punishable by a fine in the amount of one million to three million rubles, or in the amount of the wages or other income of the convicted person for a period of one to three years, or in the amount of up to 60 to 80-fold amount of a bribe with or without the

deprivation of the right to hold a particular position or engage in a certain type of activity for up to seven years or by imprisonment for a term of seven to twelve years with or without a fine of up to 60-fold amount of a bribe or and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to seven years.

5. Actions provided for by parts 1 – 4 of this article committed on an especially large scale shall be punishable by a fine in the amount of two million to five million rubles, or in the amount of the wages or other income of the convicted person for a period of two to four years, or in the amount of up to 70 to 90-fold amount of the bribe with or without the deprivation of the right to hold a particular position or engage in a certain type of activities for up to ten years or by imprisonment for a term of eight to fifteen years with or without a fine of up to 70-fold amount of a bribe or and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to ten years.

Mediation in bribery (Article 291.1 of the Criminal Code of the Russian Federation)

1. Mediation in bribery, that is, the direct transfer of a bribe on behalf of a bribe-giver or a bribe-taker, or otherwise facilitating the bribe-giver and/or bribe-taker in reaching or implementing an agreement between them to receive and give a bribe in a significant amount, shall be punishable by a fine of up to seven hundred thousand rubles, or the amount of wages or other income of the convicted person for a period of up to one year, or in the amount of 20 to 40-fold amount of a bribe with or without the deprivation of the right to hold a particular position or engage in certain activities for up to three years, or by imprisonment for up to four years with or without a fine in the amount of up to 20-fold the amount of the bribe.

2. Mediation in bribery for the commission of acts known to be illegal (omission to act) or by a person using his/her official position shall be punishable by a fine of up to one million rubles, or in the amount of wages or other income of the convicted person for a period of up to one year, or in the amount of 20 to 50-fold amount of a bribe with or without the deprivation of the right to hold a particular position or engage in certain activities for up to three years, or by imprisonment for up to three to seven years with or without a fine in the amount of up to 30-fold amount of the bribe and with or without the deprivation of the right to hold a particular position or engage in certain activities for up to three years.

3. Mediation in bribery committed:

- a) by a group of persons in collusion or by an organized group;
- b) on a major scale,

shall be punishable by a fine in the amount of one million to two million rubles, or in the amount of the wages or other income of the convicted person for a period of one to two years, or in the amount of up to 50 to 70-fold amount of the bribe with or without the deprivation of the right to hold a particular position or engage in a certain type of activity for up to five years or by imprisonment for a term of five to ten years with or without a fine of up to 60-fold amount of the bribe and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to five years.

4. Mediation in bribery committed in a particularly large amount shall be punishable by a fine in the amount of one million five thousand rubles to three million rubles, or in the amount of the wages or other income of the convicted person for a period of two to three years, or in the amount of up to 60 to 80-fold amount of the bribe with or without the deprivation of the right to hold a particular position or engage in a certain type of activity for up to seven years or by imprisonment for a term of seven to twelve years with or without a fine of up to 70-fold amount of the bribe and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to seven years.

5. A promise or offer of mediation in bribery shall be punishable by a fine in the amount of up to three million rubles, or in the amount of the wages or other income of the convicted person for a period of up to three years, or in the amount of up to 60-fold amount of the bribe with or without the deprivation of the right to hold a particular position or engage in a certain type of activity for up to five years or by imprisonment for a term of up to seven years with or without a fine of up to 30-fold amount of the bribe and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to five years.

Petty bribery (Article 291.2 of the Criminal Code of the Russian Federation)

1. Taking a bribe, giving a bribe in person or through an intermediary in the amount not exceeding ten thousand rubles shall be punishable by a fine in the amount of up to two hundred thousand rubles or in the amount of the wages or other income of the convicted person for a period of up to three months, or by correctional labor for up to one year, or by restriction of freedom for up to two years, or by imprisonment for up to one year.

2. The same acts committed by a person who has a criminal record for committing crimes provided for in Articles 290, 291, 291.1 of the Criminal Code of the Russian Federation or this Article shall be punishable by a fine in the amount of up to one million rubles or in the amount of the wages or other income of the convicted person for a period up to one year, or by correctional labor for a period of up to three years, or restriction of freedom for up to four years, or imprisonment for up to three years.

Commercial bribery (Article 204 of the Criminal Code of the Russian Federation)

1. Illegal transfer of money, securities, other property to a person performing administrative functions in a commercial or other organization, as well as illegal rendering of services of a property nature, provision of other property-related services (including in cases where, upon the instruction of such person, the property is transferred, or property-related services are provided, or property rights are granted to another private individual or legal entity) for the fulfillment of actions (inaction) in the interests of the giver or other persons, if the specified actions (inaction) are included in the official powers of such person or if, by virtue of his official position, he can contribute to the above actions (inaction), shall be punishable by a fine in the amount of up to four hundred thousand rubles, or in the amount of the wages or other income of the convicted person for a period of up to six months, or in the amount of 5 to 20-fold amount of the commercial bribery, or by restriction of freedom for up to two years, or correctional labor for a period of up to two years, or imprisonment for the same term with or without a fine of up to 5-fold amount of the commercial bribery.

2. Actions provided for by part one of this article committed in a significant amount shall be punishable by a fine in the amount of up to eight hundred thousand rubles, or in the amount of the wage or other income of the convicted person for a period of up to nine months, or in the amount of the wages or other income of the convicted person for a period of up to nine months, or in the amount of 10 to 30-fold amount of the commercial bribery with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to three years, or by correctional work for a period of one to two years with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to three years, or by imprisonment for up to three years with or without a fine in the amount of up to 10-fold amount of commercial bribery and with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to three years.

3. Actions provided for by part 1 of this article, if committed:

- a) by a group of persons in collision or by an organized group;
- b) with extortion of a bribe;
- c) on a major scale,

shall be punishable by a fine in the amount of one million five hundred thousand rubles, or in the amount of the wages or other income of the convicted person for a period of up to one year, or in the amount of up to 20 to 50-fold amount of the commercial bribery with or without the deprivation of the right to hold a particular position or engage in a certain type of activity for up to three years or by imprisonment for a term of three to seven years with or without a fine of up to 30-fold amount of the commercial bribery and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to three years.

4. Actions provided for by part one, items "a" and "b" of part three of this article, committed in a particularly large amount, shall be punishable by a fine in the amount of up to one million to two million rubles, or in the amount of the wages or other income of the convicted person for a period of up to one year to two years and six months, or in the amount of 40 to 70-fold amount of the commercial bribery with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to five years, or by imprisonment for up to four to eight years with or without a fine in the amount of up to a 40-fold amount of commercial bribery and with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to five years.

5. Illegal receipt of money, securities, other property to a person performing administrative functions in a commercial or other organization, as well as illegal use by him of services of property-related services or other property-related rights (including in cases where, upon the instruction of such person, the property is transferred, or property-related services are provided, or property rights are granted to another private individual or legal entity) for the fulfillment of actions (inaction) in the interests of the giver or other persons, if the specified actions (inaction) are included in the official powers of such person or if, by virtue of his official position, he can contribute to the above actions (inaction), shall be punishable by a fine in the amount of up to seven hundred thousand rubles, or in the amount of the wages or other income of the convicted person for a period of up to nine months, or in the amount of 10 to 30-fold amount of the commercial bribery, or by imprisonment for up to three years with or without a fine of up to 15-fold amount of the commercial bribery.

6. Actions provided for by part five of this article, committed in a significant amount, shall be punishable by a fine in the amount of up to two hundred thousand to two million rubles, or in the amount of the wages or other income of the convicted person for a period of up to three months to one year, or in the amount of 20 to 40-fold amount of the commercial bribery with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to three years, or by imprisonment for up to four to eight years with or without a fine in the amount of up to a 20-fold amount of commercial bribery and with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to three years.

7. Actions provided for by part 5 of this article, if:

- a) committed by a group of persons in collision or by an organized group;
- b) involve extortion of the subject of bribery;
- c) committed for illegal actions (inaction);
- d) committed in a large amount,

shall be punishable by a fine in the amount from one million to three million rubles, or in the amount of the wages or other income of the convicted person for a period of up to one year to three years, or in the amount of up to 30 to 60-fold amount of the commercial bribery with or without the deprivation of the right to hold a particular position or engage in

a certain type of activity for up to five years or by imprisonment for a term of five to nine years with or without a fine of up to 40-fold amount of the commercial bribery and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to five years.

8. Actions provided for by part five, items "a" - "c" of part seven of this article, committed in an especially large amount, shall be punishable by a fine in the amount of up to two million to five million rubles, or in the amount of the wages or other income of the convicted person for a period of up to two to five years, or in the amount of 50 to 90-fold amount of the commercial bribery with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to six years, or by imprisonment for up to seven to twelve years with or without a fine in the amount of up to a 50-fold amount of commercial bribery and with or without deprivation of the right to hold a particular position or engage in a certain type of activity for up to six years.

Notes.

A significant amount of commercial bribery in this article and in Article 204.1 of the Criminal Code of the Russian Federation is the amount of money, the value of securities, other property, property-related services, other property rights exceeding twenty-five thousand rubles, large amounts of commercial bribes – the one exceeding one hundred and fifty thousand rubles, especially large amount of commercial bribery – the one exceeding one million rubles.

Mediation in commercial bribery (Article 204 of the Criminal Code of the Russian Federation)

1. Mediation in commercial bribery, that is, the direct transfer of a commercial bribe (illegal gratification) on behalf of a person giving a commercial bribe or a person taking a commercial bribe, or otherwise facilitating these persons in reaching or implementing an agreement between them to give and take a commercial bribe in a significant amount, shall be punishable by a fine of up to four hundred thousand rubles, or the amount of wages or other income of the convicted person for a period of up to six months, or in the amount of 5 to 20-fold amount of the commercial bribe, or by restriction of freedom for up to two years, or correctional labor for a period of up to two years, or imprisonment for the same term with or without a fine of up to 5-fold amount of the commercial bribe.

2. Mediation in commercial bribery committed:

- a) by a group of persons in collusion or by an organized group;
- b) for illegal actions (inaction);
- c) on a major scale,

shall be punishable by a fine in the amount of up to eight thousand rubles, or in the amount of the wages or other income of the convicted person for a period of up to six months, or in the amount of up to 10 to 30-fold amount of the commercial bribe with or without the deprivation of the right to hold a particular position or engage in a certain type of activity for up to five years or by imprisonment for a term of five to ten years with or without a fine of up to 30-fold amount of the commercial bribe and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to five years.

3. Mediation in commercial bribery committed in especially large amount shall be punishable by a fine in the amount of up to one million five thousand rubles, or in the amount of the wages or other income of the convicted person for a period of up to one year six months, or in the amount of up to 40 to 70-fold amount of the commercial bribe with or without the deprivation of the right to hold a particular position or engage in a certain type of activity for up to six years or by imprisonment for a term of three to seven years with or without a fine of up to 40-fold amount of the commercial bribe and with or

without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to six years.

4. A promise or offer of mediation in commercial bribery shall be punishable by a fine in the amount of up to one million rubles, or in the amount of the wages or other income of the convicted person for a period of up to one year, or in the amount of up to 10 to 20-fold amount of the commercial bribe with or without the deprivation of the right to hold a particular position or engage in a certain type of activity for up to three years or by imprisonment for a term of up to one year to two years with or without a fine of up to 15-fold amount of the bribe and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to three years.

Petty commercial bribery (Article 204.2 of the Criminal Code of the Russian Federation)

1. Commercial bribery in an amount not exceeding ten thousand rubles shall be punishable by a fine in the amount of up to one hundred and fifty thousand rubles, or in the amount of the wages or other income of the convicted person for a period of up to three months, or by correctional labor for up to two hundred hours, or by restriction of freedom for up to one year.

2. The same acts committed by a person who has a criminal record for committing crimes provided for in Articles 204, 204.1 of the Criminal Code of the Russian Federation or this Article shall be punishable by a fine in the amount of up to five hundred thousand rubles or in the amount of the wages or other income of the convicted person for a period up to six months, or by correctional labor for a period of up to one year, or by restriction of freedom for up to two years, or by imprisonment for up to one year.

Provocation of bribery or commercial bribery (Article 304 of the Criminal Code of the Russian Federation)

Provocation of bribery or commercial bribery, that is an attempt to transfer an attempt to transfer to an official, a foreign official, an official of an international public organization or to a person performing administrative functions in commercial or other organizations, without his consent, of money, securities, other property or provision of property-related services, granting other property rights for the purpose of artificial creation of evidence of a crime or blackmail, shall be punishable by a fine in the amount of up to two hundred thousand rubles or in the amount of the wages or other income of the convicted person for a period of up to eighteen months, or by compulsory labor for a period of up to five years with or without the deprivation of the right to hold a particular position or engage in a certain type of activity for up to three years, or by imprisonment for a term of up to five years with or without a fine of up to 15-fold amount of the bribe and with or without deprivation of the right to hold a particular positions or engage in a certain type of activity for up to three years.

Illegal gratification on behalf of a legal entity (Article 19.28 of the Code of the Russian Federation on Administrative Offenses)

1. Illegal transfer, offer or promise on behalf of or in the interests of a legal entity to an official, a person performing administrative functions in a commercial or other organization, to a foreign official or an official of an international public organization of monetary funds, securities, other property, rendering property-related services to him, granting of property rights for the performance in the interests of this legal entity by an official, a person performing administrative functions in a commercial or other organization,

by a foreign official or by an official of an international public organization of action (inaction) related to the position they hold, shall be punishable by an administrative fine imposed on legal entities in the amount of up to 3-fold amount of monetary funds, the value of securities, other property, property-related services, other property rights illegally transferred or rendered or promised on behalf of a legal entity, however, not less than one million rubles with confiscation of the monetary funds, securities, other property or value of the property-related services, other property rights.

2. Actions provided for by part 1 of this article, committed in a large amount, shall entail the imposition of an administrative fine on legal entities up in the amount of up to 30-fold amount of the monetary funds, the value of securities, other property, property-related services, other property rights, illegally transferred or provided or promised or proposed on behalf of a legal entity, however, not less than twenty million rubles with the confiscation of the monetary funds, securities, other property or value of the property-related services, other property rights.

3. Actions provided for by part 1 of this article, committed in a especially large amount, shall entail the imposition of an administrative fine on legal entities up in the amount of up to 100-fold amount of the monetary funds, the value of securities, other property, property-related services, other property rights, illegally transferred or provided or promised or proposed on behalf of a legal entity, however, not less than one hundred million rubles with the confiscation of the monetary funds, securities, other property or value of the property-related services, other property rights.

Notes:

In this article, the large amount is the amount of monetary funds, the value of securities, other property, property-related services, other property rights exceeding one million rubles, and especially large amount is the one exceeding twenty million rubles.

A PERSON WHO HAS GIVEN A BRIBE OR HAS COMMITTED COMMERCIAL BRIBERY OR IS A MEDIATOR IN BRIBERY MAY BE EXEMPTED FROM LIABILITY IN THE FOLLOWING CASES

A person who has given a bribe or has committed commercial bribery may be exempted from liability if:

- the person who has given a bribe or has committed commercial bribery actively contributed to the disclosure and (or) investigation of the crime and a solicitation of a bribe or a subject of commercial bribery took place in respect of him, if before the transfer of values the person voluntarily stated this to the body authorized to initiate criminal proceedings or to carry out operational search activity, and the transfer of property, the granting of property rights, the provision of property-related services nature were carried out under the control for the purpose of arresting a person who declared such demands;

- after committing a crime the person voluntarily reported of bribery or commercial bribery to a body authorized to initiate criminal proceedings, and also actively contributed to the disclosure and/or investigation of the crime.

In this case, a notice shall not be deemed voluntary if made in connection with the fact that authorities became aware of bribery, mediation in bribery or commercial bribery from other sources (paragraph 29 of the Resolution of the Plenum of the Supreme Court of the Russian Federation dated July 9, 2013 No. 24) .

A deliberately false denunciation of extortion or commercial bribery is considered by the Criminal Code of the Russian Federation as a crime and shall be punishable by imprisonment for up to six years (Article 306 of the Criminal Code of the Russian Federation).

Extortion of a bribe may be carried out both as a direct demand (for example, "if you do not give ... the issue will not be resolved in your favor") and indirectly.

A person who is an intermediary in bribery or commercial bribery shall be exempted from criminal liability if, after committing a crime, he actively promoted the disclosure and/or suppression of the crime and voluntarily informed the body authorized to initiate criminal proceedings of mediation in bribery or commercial bribery (Articles 291.1 and 204.1 of the Criminal Code of the Russian Federation).

Any behavior that might be interpreted by others as a promise to give a bribe or an offer to give a bribe or as an agreement to accept a bribe or as a request of a bribe is unacceptable for a Vnesheconombank's employee.

In order to prevent such negative consequences, employees of Vnesheconombank should pay attention to the manner of their communication with colleagues, representatives of organizations, other citizens and, in particular, refrain from behavior that may be interpreted by others as a promise or an offer to give a bribe or as an agreement to accept a bribe or a request for a bribe.

SOME INDIRECT SIGNS OF AN OFFER OF A BRIBE (COMMERCIAL BRIBERY) AND YOUR ACTIONS IN CASE YOU ARE OFFERED A BRIBE (COMMERCIAL BRIBE)

A conversation about a possible bribe is allegorical, the bribe-giver's speech consists of monosyllabic proposals that do not contain open statements indicating that if the issue is positively resolved he will transfer money or render any services; no "dangerous" expressions are allowed in this case.

In the course of a conversation, the bribe-giver, if there are witnesses or audio- or video equipment, with gestures or facial expressions makes it clear that he is ready to discuss the possibilities of solving the problem in another situation (at another time, in another place); the amount or nature of a bribe are not announced. However, the corresponding figures may be written on a piece of paper, typed on a calculator or computer and demonstrated to a potential bribe-taker.

The bribe-giver may readdress the continuation of the contact to another person who is not directly involved in resolving the issue.

The bribe-giver may suddenly interrupt the conversation and leave the room under a specious excuse leaving a folder with materials, an envelope, a briefcase, a package.

In this case, do not touch the objects left, immediately invite the direct supervisor to your office, other employees of Vnesheconombank, where necessary, draw up a certificate and contact law enforcement bodies.

The signs of commercial bribery are analogous to the characteristics of giving a bribe.

Attention! Even if all your actions are legal and you conscientiously fulfill your job duties, you may be provoked to receive a bribe or commercial bribery for the purpose of compromise and slander.

According to Article 304 of the Criminal Code of the Russian Federation, provocation of a bribe or commercial bribery means an attempt to transfer money, securities, other property to an official, a foreign official, an official of an international public organization or a person performing administrative functions in commercial or other organizations, without the consent of such person, or to render to him property-related services, grant other property rights for the purpose of artificial creation of evidence of a crime or blackmail.

In this regard, we recommend you to follow these principles.

In the process of fulfilling job duties, an employee of Vnesheconombank shall take measures to unconditionally and fully observe the job description, orders of Vnesheconombank, legislative and other normative legal acts of the Russian Federation, and he:

- shall not incur any obligations to third parties related to tissues within the competence of Vnesheconombank, shall not give them promises regarding the resolution of such issues;

- shall not visit, without the authority from the direct supervisor, informal meetings with someone related to the official duties of such employee of Vnesheconombank.

Meetings with persons related to the issues within the competence of Vnesheconombank shall be conducted in special places (meeting rooms) equipped with audio- and video recording devices or, in exceptional cases, in offices in the presence of at least one employee of Vnesheconombank.

Employees of Vnesheconombank, in their absence, shall close their offices with the key.

An employee of Vnesheconombank shall not accept any documents or materials related to official activity from any person (including acquaintances), outside the office premises. Documents received by Vnesheconombank shall be subject to accounting and registration in accordance with the procedure established by the internal regulatory documents of Vnesheconombank.

YOUR ACTIONS IN CASE OF INDUCEMENT TO RECEIVE A BRIBE, EXTORTION OR PROVOCATION OF A BRIBE (COMMERCIAL BRIBERY)

Always try to receive visitors, who ask you to resolve any personal or personal issues, in the presence of others.

You should behave extremely cautiously, politely, without fawning, not allowing rash statements that could be interpreted by a bribe-giver as willingness or as a categorical refusal to accept a bribe or commercial bribery.

Remove from the desktop documents and other items under which one may put money.

If someone is trying to transfer money to you, to give a gift against your will, openly, loudly, unequivocally, in words and gestures, express your negative attitude to this (remember that a bribe provoker may conduct a hidden audio- or video recording of your conversation with him).

Listen carefully and remember accurately the conditions offered to you (the amounts of money, the names of the goods and the nature of the services, the terms and means of transferring a bribe, the form of commercial bribery, the sequence of resolving the issues);

Try to postpone discussion of the time and place of transfer of a bribe to the next conversation or, if it is impossible, to offer a place well known to you for the next meeting.

Do not take the initiative when talking, "attribute to the receipt" more instead, let the potential bribe-taker "speak out", report to you as much information as possible.

If you have a voice recorder, try to record (secretly) a proposal for a bribe or commercial bribery.

Inform your immediate supervisor in writing of all proposals received and attempts to give you a bribe.

Never agree to the proposals of strangers and unfamiliar persons to meet to discuss any business or personal issues outside the office premises (in the street, in public transport, in a car, at a cafe, etc.).

Strictly forbid your relatives, without your knowledge, accept any material values (money, gifts, etc.) from any person whatever.

MEASURES THAT SHALL BE TAKEN IMMEDIATELY AFTER AN ACCOMPLISHED FACT OF OFFERING OF A BRIBE

Article 11.1 of the Federal Law "On Counteracting Corruption" prescribes that employees of state corporations shall notify of any appeals to them for the purpose of inducing corrupt offenses.

An employee of Vnesheconombank shall notify the employer, the prosecutor's office or other state bodies of all cases when any person appeal to him for the purpose of inducing him to commit corrupt offenses.

Employees of Vnesheconombank shall notify the employer of cases when any person appeal to him for the purpose of inducing him to commit corrupt offenses in accordance with the procedure established by the Order of Vnesheconombank No. 848 dated 25 September 2013 "On Approval of the Procedure for notifying the employer of fact of appealing to employees of Vnesheconombank for the purpose of inducing corrupt offenses, registration of such notifications and organization of verification of the information contained therein".

A notice of the facts of appealing for the purpose of inducing corrupt offenses, except for cases when the facts have been checked or are being checked, is the official duty of an employee of Vnesheconombank.

A failure to fulfill the specified official duty by an employee of Vnesheconombank is an offense entailing dismissal of the employee or bringing him to liability of other types in accordance with the legislation of the Russian Federation.

An employee of Vnesheconombank who notified the employer, the prosecutor's office or other state bodies about the facts of appealing to him for the purpose of inducing him to commit corrupt offenses, of the facts of committing corrupt offenses by other employees of Vnesheconombank, of a failure to provide information or provision of knowingly unreliable or incomplete information about incomes, property and property-related obligation, shall be protected by the state in accordance with the legislation of the Russian Federation.

BEHAVIOR THAT MAY BE INTERPRETED BY OTHERS AS A CONSENT TO TAKE A BRIBE OR AS A REQUEST FOR A BRIBE

It is recommended to an employee of Vnesheconombank to refrain from using expressions that may be interpreted by others as a request (hint) for a bribe. Such expressions include, for example: "it is difficult to solve the problem, however, quite possible", "you cannot spread "thank you" on bread", "we will come to agreement", "we need stronger arguments", "we need to discuss the parameters", "so, what shall we do?", etc.

Discussion by employees of Vnesheconombank of certain topics with representatives of organizations and citizens, especially with those whose benefits depend on the resolutions and actions of employees of Vnesheconombank, may also be interpreted as a request for bribery.

Such topics include, for example:

the low level of wages of an employee of Vnesheconombank and the shortage of funds for the implementation of various needs;

a desire to acquire certain property, to receive a particular service, to go on a tourist trip;

unemployed relatives of an employee of Vnesheconombank;

a need for the children of an employee of Vnesheconombank to enter educational institutions, etc.

In addition, certain proposals coming from the employee of Vnesheconombank, especially if they are addressed to representatives of organizations and citizens, whose benefits depend on their resolutions and actions, may also be interpreted as a request for bribery.

This may be even in case where such proposals are based on good intentions and in no way are connected with the personal benefit of an employee of Vnesheconombank.

Such proposals include, for example, proposals:

to provide a discount to an employee of Vnesheconombank and (or) his relatives;

to use the services of a specific company and (or) experts to eliminate identified violations, to perform work under the state contract, to prepare the necessary documents;

to contribute money to a specific charitable foundation;

to support a specific sports team and so on.

Performance of certain actions by an employee of Vnesheconombank may be interpreted as a consent to accept a bribe or as a request for a bribe.

Such actions include:

- regular receipt of gifts regardless of the value of the gift;

- visiting restaurants together with representatives of an organization that has gained, gains or may gain benefit from resolutions or actions (inaction) of an employee of Vnesheconombank.

ADDITIONAL INFORMATION

The main normative legal acts of the Russian Federation in the field of prevention of corruption and other offenses are as follows:

The Labor Code of the Russian Federation;

The Federal Law "On Combating Corruption" No. 273-FZ dated 25 December 2008;

The Federal Law "On Control over the Correspondence of Expenses of Persons Holding Public Functions (and Other Persons) to their Revenues" No. 230-FZ dated 03 December 2012;

The Federal Law "On Prohibiting Certain Categories of Individuals from Opening and Maintaining Accounts (Deposits) and Keeping Cash and Valuables in Foreign Banks Located Outside the Territory of the Russian Federation, and owning and (or) using foreign financial instruments" No. 79-FZ dated 07 May 2013;

The Federal Law "On Amendments to Certain Legal Acts of the Russian Federation in Connection with the Adoption of the Federal Law "On Prohibiting Certain Categories of Individuals from Opening and Maintaining Accounts (Deposits) and Keeping Cash and Valuables in Foreign Banks Located Outside the Territory of the Russian Federation, and owning and (or) using foreign financial instruments" No. 102-FZ dated 07 May 2013;

The Federal Law "On Amending Certain Legal Acts of the Russian Federation on anti-corruption issues" No. 431-FZ dated 22 December 2014;

The Federal Law "On Amendments to separate legislative acts of the Russian Federation in terms of establishing the obligation of persons holding public functions (and other persons) to report about the emergence of personal interest, which leads or can lead To a conflict of interests, and take measures to prevent or resolve conflicts of interest" No. 285-FZ dated 05 October 2015;

The Federal Law "On Amendments to separate legislative acts of the Russian Federation pertaining to definition of the notion of "foreign financial instruments" No. 505-FZ dated 28 December 2016;

The Decree of the President of the Russian Federation "On Measures to Counteract Corruption" No. 815 dated 19 May 2008;

The Decree of the President "On provisions by citizens who claim to fill the posts of the federal civil service and federal government employees information on income, property and property-related obligations" No. 559 dated 18 May 2009;

The Decree of the President of the Russian Federation "On the verification of the authenticity and completeness of information submitted by citizens claiming to fill the posts of the federal civil service and federal civil servants, and compliance by federal civil servants with the requirements for official behavior" No. 1065 dated 21 September 2009;

The Decree of the President of the Russian Federation "On the National Anti-Corruption Strategy and the National Anti-Corruption Plan for 2010-2011" No. 460 dated 13 April 2010;

The Decree of the President of the Russian Federation "On commissions to comply with the requirements for the conduct of official behavior of federal civil servants and the settlement of conflicts of interest" No. 821 dated 01 July 2010;

The Decree of the President of the Russian Federation "On the National Plan for Combating Corruption for 2012-2013 and Amendments to Certain Acts of the President of the Russian Federation on Combating Corruption" No. 297 dated 13 March 2012;

The Decree of the President of the Russian Federation "On the National Plan of Combating Corruption for 2014-2015" No. 226 dated 11 April 2014;

The Decree of the President of the Russian Federation "On the National Plan of Combating Corruption for 2016-2017" No. 147 dated 01 April 2016;

The Decree of the President of the Russian Federation "On the main directions in improving the system of public administration" No. 601 dated 07 May 2012;

The Decree of the President of the Russian Federation "On Measures to Implement Certain Provisions of the Federal Law "On Combating Corruption" No. 309 dated 02 April 2013;

The Decree of the President of the Russian Federation "On Measures to Implement Certain Provisions of the Federal Law "On Control over the Correspondence of Expenses of Persons Holding Public Functions (and Other Persons) to their Revenues" No. 310 dated 02 April 2013;

The Decree of the President of the Russian Federation "On Anti-Corruption Issues" No. 613 dated 08 July 2013;

The Decree of the President of the Russian Federation "On Amending Certain Acts of the President of the Russian Federation on Anti-Corruption Issues" No. 453 dated 23 June 2014;

The Decree of the President of the Russian Federation "On approval of the form of information on incomes, expenditures, on property and property-related obligations and introduction of amendments to certain acts of the President of the Russian Federation" No. 460 dated 23 June 2014;

The Decree of the President of the Russian Federation "On Certain Issues of Combating Corruption" No. 120 dated 08 March 2015;

The Decree of the President of the Russian Federation "On measures to improve the organization of activities in the field of combating corruption" No. 364 dated 15 July 2015;

The Decree of the President of the Russian Federation "On the procedure for communication by persons who hold certain public positions of the Russian Federation, positions of the federal civil service and other persons of the appearance of personal

interest in the performance of official duties that leads or may lead to a conflict of interests, and on amending certain acts of the President of the Russian Federation" No. 650 dated 22 December 2015;

The Decree of the Government of the Russian Federation "On the observance by employees of state corporations and state companies of the provisions of Article 349.1 of the Labor Code of the Russian Federation" No. 841 dated 21 August 2012;

The Decree of the Government of the Russian Federation "On the procedure for communication by an employer when entering into an employment contract with a citizen who held the post of the state or municipal service, the list of which is established by the regulatory legal acts of the Russian Federation, within 2 years after his dismissal from the state or municipal service of entering into such a contract to the representative of the employer or a municipal employee at the latest place of his service" No. 700 dated 08 September 2010;

The Decree of the Government of the Russian Federation "On application to certain categories of citizens of restrictions, bans and duties established by the Federal Law "On Combating Corruption" and other federal laws in order to combat corruption" No. 568 dated 05 July 2013;

The Decree of the Government of the Russian Federation "On provision to citizens applying for positions in organizations established to fulfill the tasks assigned to the Government of the Russian Federation and employees who hold positions in these organizations, of information on incomes, expenses, property and property-related obligations, verification of the reliability and completeness of the information provided and compliance by employees with requirements for official conduct" No. 613 dated 22 July 2013;

The Decree of the Government of the Russian Federation "On the procedure for communication by certain categories of persons of the receipt of a gift in connection with official events, official business trips and other official events, participation in which is related to their performance of official (job) duties, delivery and evaluation of the gift, sale (repurchase) and transfer of funds obtained from its sale" No. 10 dated 09 January 2014;

The Decree of the Government of the Russian Federation "On Amending the Decree of the Government of the Russian Federation dated January 9, 2014 No. 10" No. 1089 dated 12 October 2015;

The Order of the Ministry of Labor and Social Protection of the Russian Federation "On the requirements for the placement and filling of subsections on anti-corruption issues, official websites of federal state bodies, the Central Bank of the Russian Federation, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, state corporations (companies), other organizations established on the basis of federal laws, and requirements for position filling of which entails placement of information on incomes, expenses, property and property-related obligations" No. 530n dated 07 October 2013;

Other regulatory legal acts of the Russian Federation.

Normative legal acts regulating the application of measures of liability for obtaining and giving bribes and illegal gratification:

The Criminal Code of the Russian Federation;

The Code of the Russian Federation on Administrative Offenses;

The Resolution of the Plenum of the Supreme Court of the Russian Federation "On judicial practice in cases of bribery and other corruption crimes" No. 24 dated 09 July 2013.

In order to prevent corruption and other offenses and ensure conditions for the conscientious and effective performance by employees of Vnesheconombank of their official duties, to prevent abuses at Vnesheconombank in accordance with the legislation of the Russian Federation, the following internal regulations are adopted:

The Order "On Approval of the List of Positions with Vnesheconombank, in regard to which citizens when appointed to them and employees of Vnesheconombank holding these positions shall provide information about their income, property and property-related obligations, as well as information on income, property and property-related obligations of their spouses and minor children (with subsequent amendments) No. 532 dated 28 June 2013;

The Order "On the Composition of the Commission on Observance of the Requirements for the Professional Behavior of Employees of Vnesheconombank and Settlement of a conflicts of Interest" (with subsequent amendments) No. 533 dated 01 July 2013;

The Order "On Approval of the Procedure for Submission by Citizens claiming to fill positions with Vnesheconombank, and employees of Vnesheconombank of the information on income, expenses, property and property-related obligations, as well as information on income, expenses, property and property-related obligations of their spouses and minor children" (with subsequent amendments) No. 534 dated 01 July 2013;

The Order "On Approval of the Regulation on Verification of the Reliability and Completeness of Information provided by Citizens Claiming to fill positions with Vnesheconombank, and employees of Vnesheconombank, and compliance by employees of Vnesheconombank with the requirements to professional conduct" (with subsequent amendments) No. 535 dated 16 July 2013;

The Order "On Approval of the Procedure for notifying the employer of fact of appealing to employees of Vnesheconombank for the purpose of inducing corrupt offenses, registration of such notifications and organization of verification of the information contained therein" (in the wording with subsequent amendments) No. 848 dated 25 September 2013;

The Order "On Approval of the List of Positions with Vnesheconombank holding of which entails the placement of information on incomes, expenditures, property and property-related obligations on the official website of Vnesheconombank" (with subsequent amendments) No. 107 dated 05 February 2014;

The Order "On Approval of the Regulation on the procedure for communication by certain categories of persons of the receipt of a gift in connection with official events, official business trips and other official events, participation in which is related to their performance of official (job) duties, delivery and evaluation of the gift, sale (repurchase) and transfer of funds obtained from its sale" (with subsequent amendments) No. 298 dated 02 April 2014;

The Order "On Approval of the Code of Ethics and professional conduct of Employees of Vnesheconombank" (with subsequent amendments) No. 299 dated 02 April 2014;

The Order "On the Approval of the Forms of Documents Related to Counteracting Corruption for completion" (with subsequent amendments) No. 509 dated 02 June 2014;

The Order "On the Commission on the Acquisition and Disposal of the assets of Vnesheconombank" No. 581 dated 26 June 2014;

The Order "On approval of the Plan of Vnesheconombank on counteracting corruption for 2014-2015" No. 731 dated 01 August 2014;

The Order "On Approval of the List of Positions in regard to which employees of Vnesheconombank, when holding these positions, shall not open and maintain accounts

(deposits), store cash and valuables in foreign banks located outside the territory of the Russian Federation, and (or) use foreign financial instruments" (with subsequent amendments) No. 490 dated 04 June 2015;

The Order "On Approval of the Composition of the Commission On observance with the requirements for professional conduct of employees of Vnesheconombank and settlement of a conflict of interest" No. 736 dated 06 August 2015;

The Order "On Approval of the Procedure for Notification of the Employer (Its Representative) by employees of Vnesheconombank holding the Positions Included in the List of Positions with Vnesheconombank, in regard to which citizens when appointed to them and employees of Vnesheconombank holding these positions, shall provide information about their income, property and property-related obligations, as well as information on income, property and property-related obligations of their spouses and minor children, on the occurrence of a personal interest that leads or may lead to a conflict of interest" No. 706 dated 30 July 2015. (with subsequent amendments);

The Order "On Measures for the Implementation of the Decree of the Government of the Russian Federation dated July 5, 2013 No. 568 "On application to certain categories of citizens of restrictions, prohibitions and duties established by the Federal Law "On Combating Corruption" and other federal laws in order to counteract corruption" (with subsequent amendments) No. 707 dated 30 July 2015;

The Order "On Approval of the Composition of the Commission on the Acquisition and Disposal of the Assets of Vnesheconombank" No. 995 dated 15 October 2015;

The Order "On Approval of the Plan of Vnesheconombank on counteracting corruption for 2016-2017" No. 74 dated 17 February 2016;

The Order "On approval of the Regulation on the procedure for monitoring the compliance of the expenses of employees of Vnesheconombank, the expenses of their spouses and minor children with the revenues of employees of Vnesheconombank and their spouses" (with subsequent amendments) No. 127 dated 17 March 2016;

The Order "On Approval of the Composition of the Commission on Observance of the Requirements for the Professional Behavior of Employees of Vnesheconombank and Settlement of a Conflict of Interest" No. 319 dated 23 June 2016;

The Order "On Approval of the Composition of the Commission on the Acquisition and Disposal of the Assets of Vnesheconombank" No. 509 dated 19 September 2016;

Other orders of Vnesheconombank.