

Extract from ISU Anti-Corruption Policy

2. General provisions

The policy reflects the commitment of the University and its management to high ethical standards of conducting transparent and honest business and to social responsibility.

The policy is developed in accordance with:

- applicable anti-corruption legislation;
- Code of ethics and official conduct;
- other local regulations of the University.

The Policy is the fundamental document of the University in the field of anti-corruption activities.

In accordance with the Policy, measures to prevent and combat corruption are being developed and implemented.

All employees must be guided by this Policy and strictly comply with its principles and requirements.

The principles and requirements of this Policy apply to students of the University, contractors, as well as other persons who can act on behalf of the University, in cases where the corresponding obligations are fixed in contracts with them, in their internal documents or are directly stipulated by the legislation of the Russian Federation.

5. Basic principles of anti-corruption activities of the University

The system of measures to prevent and combat corruption at the University is based on the following key principles:

- compliance of the Policy with the current legislation and generally accepted norms

The anti-corruption measures implemented by the University comply with the Constitution of the Russian Federation, international treaties concluded by the Russian Federation, the legislation of the Russian Federation and other regulatory legal acts applicable to the University;

- rejection of corruption in all forms and manifestations

The University enshrines the principle of rejection of corruption in all forms and manifestations in the implementation of both operational and investment and other types of activities. The principle of rejection of corruption means a strict prohibition for employees and other persons acting on behalf of the University or in its interests, directly or indirectly, personally or through any mediation, to participate in acts of corruption regardless of the business practice in a particular country. The University emphasizes the inadmissibility of acts of corruption, including manifestations of conflicts of interest, both in relation to representatives of the state, public formations, private companies, politicians and other third parties, and in relation to University employees through abuse of authority in order to obtain any personal benefit:

- personal example of the University administration

The University administration plays a key role in the formation of a culture of intolerance to corruption and in the creation of a system for preventing and combating corruption at the University;

- employee engagement

University employees are informed about the provisions of anti-corruption legislation and actively participate in the formation and implementation of anti-corruption standards and procedures;

- consistency, proportionality to the risk of corruption and the effectiveness of anti-corruption procedures

The University develops and implements a system of anti-corruption procedures to counteract and prevent involvement in corruption activities that reasonably meets the identified risks. The University ensures the implementation of the most transparent anti-corruption procedures in business processes exposed to corruption risks. The University strives to apply low cost anti-corruption procedures that ensure the simplicity of implementation and bring significant results;

- responsibility and inevitability of punishment

The University holds the University employees accountable if they commit corruption offenses in connection with their work duties, regardless of their position, work experience and other conditions in accordance with the procedure established by applicable law and the University's local regulations.

The University makes all possible reasonable and legitimate efforts for the most rapid, inevitable administration of punishment and restraint of violations.

The University conducts checks on all reasonably substantiated reports of corruption offenses.

The University reserves the right to disclose information about persons who have violated the requirements of the applicable legislation and the Policy.

The University establishes personal responsibility of the University administration for the implementation of the Policy;

- openness in business

Contractors of the University, suppliers of goods, works, services, partners and the public are informed about the anti-corruption business standards adopted at the University;

- due diligence

Before making a decision on starting or continuing business relationships, the University checks the reliability, rejection of corruption and absence of a conflict of interest of contractors and job candidates;

- constant control and regular monitoring

The University monitors the effectiveness of the implemented anti-corruption standards and procedures and controls their implementation.

7.5. Exchange of business courtesies and signs of business hospitality

The University recognizes the exchange of business courtesies and the implementation of hospitality expenditures, including business hospitality as a necessary part of doing business and generally accepted business practice. The University induces an atmosphere of honesty and transparency regarding business courtesies and business hospitality expenses. At the same time, the University considers this area vulnerable from the point of view of the risk of involvement in corrupt activities, therefore, gifts and hospitality that employees on behalf of the University can provide to other persons and organizations or that employees in connection with their activities at the University can receive from other persons and organizations must meet all of the following criteria:

- be directly related to the legitimate goals of the University's activities, for example, with the presentation or completion of commercial projects, successful execution of contracts or with generally accepted holidays such as Christmas and New Year, International Women's Day, as well as memorable dates and anniversaries;

- be reasonable;

- be worth up to 3,000 (three thousand) rubles;

- not to represent a hidden reward for a service, commission, omission, connivance, patronage, granting rights, making a certain decision, etc. or an attempt to influence the recipient for another illegal or unethical purpose;

- not to create reputational risk for the University, employees and other persons in case of disclosure of information about gifts;

- not contradict the principles and requirements of the Policy, other local regulations of the University, and the norms of applicable anti-corruption legislation.

If the gifts and hospitality that employees may receive or have received from other persons and organizations in connection with their activities at the University do not meet the totality of the above criteria, employees are obliged to act in accordance with the provisions of the Code of Ethics and Official Conduct of the ISU.

Gifts on behalf of the University in the form of money, cash or non-cash, in any currency are not allowed.

The principles and rules that guide employees when accepting and giving gifts, the composition, the procedure for registration and payment of hospitality expenditures at the University, the limits of expenses for entertainment, as well as the list of officials entitled to carry out hospitality expenditures, are determined by the Policy and other local regulations of the University.

7.6. Implementation of procurement activities

When carrying out procurement activities, the University is guided by the current legislation and the University's local regulations.

The University provides information transparency when posting information about the procurement of goods, works, services for the University needs.

The University promotes unrestricted, fair competition in relation to candidates and participants in the procurement of goods, works, services for the University needs.

The University provides equal access to participation in the procurement procedures to any legal entities/several legal entities acting on the part of one candidate for participation in the procurement, regardless of the organizational and legal form, form of property, location and place of origin of capital or to any individuals/several individuals acting on the part of one candidate for participation in the procurement, including individual entrepreneurs/several individual entrepreneurs acting on the part of one candidate for participation in the procurement, corresponding to the requirements established by Federal Law № 44-ФЗ dated 05.04.2013 “On the Contract System in the Field of Procurement of Goods, Works, Services for State and Municipal Needs” and the current version of the Model Regulation on the Procurement of Goods, Works, Services for the Needs of Federal State Autonomous Institutions, Federal State-Funded Institutions, Federal State Unitary Enterprises, Subordinated to the Ministry of Science and Higher Education of the Russian Federation.

The University establishes criteria for evaluating candidates' applications for participation in the procurement, excluding their discrimination.

The University guarantees an unbiased procedure for selecting participants and determining winners when conducting procedures of procurement of goods, works, services for the University needs.

The University does not allow the establishment and use of any conditions and procedures that restrict the unrestricted competition between candidates and participants in the procurement of goods, works and services for the University needs.

At the University it is prohibited:

- to reject or accept applications for participation in procurement without justification;
- for the customer to coordinate the actions of candidates or procurement participants, which leads or may lead to the prevention, restriction or elimination of competition;
- to create preferential conditions for a candidate/several candidates or a procurement participant/several procurement participants for participating in procurement, including by accessing information;
- for the University employees to participate in procurement as a candidate;

7.11. Interaction with University customers and suppliers of goods, works, services

The University's business relations are based on trust with customers and suppliers of goods, works, services. The University does everything necessary to ensure fair and unbiased treatment of customers and suppliers of goods, works, services.

The University adheres to the principles of ethics and mutually beneficial cooperation in its commercial activities and declares that in order to build business relationships with customers or suppliers of goods, works, services, there is no need to give gifts, provide services and organize entertainment to University employees.

The University makes sufficient efforts to minimize the risk of business relations with customers or suppliers of goods, works, services that have been or may be involved in corrupt activities.

In order to reduce the risk of involvement of the University in corrupt activities, special procedures are being introduced to verify customers and suppliers of goods, works, services. The University evaluates the rejection of corruption on the part of customers and suppliers of goods, works, services of the University, including checking whether they have their own anti-corruption procedures and/or policies, checks through official sources their reliability, affiliation with government officials (through close relatives or on other grounds), state companies and structures, willingness to comply with Policy requirements and include anti-corruption conditions in contracts and also to provide mutual assistance for ethical business conduct and prevention of corruption.

Before forming a business relationship, the University informs customers and suppliers of goods, works, services about the principles of the Policy, posting it with free access. A standard anti-corruption condition is introduced into contracts related to the economic activities of the University.