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ANTI-CORRUPTION POLICY OF TELKO LLC

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1. GENERAL PROVISIONS

- 1.1. This Anti-Corruption Policy (“**Policy**”) has been developed in pursuance of the anti-corruption laws of the Russian Federation.
- 1.2. The Policy is a bylaw binding upon all Company employees. In addition, this Policy may apply to other parties, for instance, individuals and/or legal entities that enter into contractual relationships with the Company.
- 1.3. The purposes hereof comprise:
 - Complying with the requirements of the Russian Federation laws prescribing to adopt anti-corruption measures;
 - Creating an institutional anti-corruption basis for the Company to carry out its activities and interface with government authorities;
 - Building relations with government authorities on anti-corruption matters;
 - Making the Company employees and other parties concerned (third parties) aware of the basic anti-corruption principles and rules;
 - Entrenching the ethical business conduct principles with the Company employees;
 - Fostering a zero tolerance to corruption in all forms and manifestations with the Company employees both as they perform their job duties and in everyday life.
- 1.4. The Company’s basic operating principles are set forth in Section 3 hereof. These principles reflect the Company’s policy as it regards business practices and interface with any third parties.
- 1.5. The Company expresses its commitment to the principles and rules set out in the Anti-Corruption Charter of the Russian Business signed on 20 September 2012 at the 11th Investment Forum in Sochi by the leaders of the Russian business community (“**Charter**”). The Company hereby expresses its willingness to join the Charter referred to above.
- 1.6. This policy has been developed with due regard for the Company’s potential corruption risks. The Policy factors in the peculiarities of the Company’s activities, specifically: economic sector, local peculiarities of business (non-profit) activities, peculiarities of interface with government authorities and public officials that the Company has to contact directly, and other relevant peculiarities.

- 1.7. The Company was developing the Policy with due regard for the recommendations set forth in the Guidelines for Companies to Design and Adopt Corruption Prevention and Control Measures” approved by the Ministry of Labour and Social Protection of the Russian Federation on 08 November 2013.

2. DEFINITIONS

- 2.1. The following terms are used herein:

Gratification — assets (e.g.: cash, securities, real estate, etc.), services (e.g.: renovation of an apartment, construction of a summer house, provision of consulting services), release from obligations (forgiveness of debt under a contract, provision of a loan (credit) at an artificially low interest rate), or property rights (e.g.: copyrights, trademark rights).

Official — a person acting as a government official or performing the organisational and executive, administrative and economic functions in the central or local government authority on a permanent or temporary basis or under a special mandate.

Trading in influence — illegal provision of the executive officer of a business or any other entity with cash, securities, any other assets, monetised services, any other rights in exchange for actions (omissions) in the interest of the giver by virtue of this person’s office.

Counterparty — any Russian or foreign individual or legal entity that enters into contractual relationships with the Company (either under contract or de facto).

Conflict of interest — a situation when an employee’s self-interest (either direct or indirect) influences or may potentially influence proper performance of his/her job (employment) duties and gives rise or may potentially give rise to a conflict between the employee’s self-interest and the Company’s rights and legitimate interests capable of harming the rights and legitimate interests, assets, and/or business reputation of the Company employing this person.

Corruption — (i) abuse of office, bribe giving, bribe taking, abuse of authority, trading in influence, or any other illegal use of position by an individual in conflict with the legitimate interests of the Company and state with a view to deriving a benefit in the form of cash, valuables, other assets, or monetised services, other property rights for himself/herself or for third parties or illegal provision of such person with such benefit by other individuals; (ii) commitment of the acts mentioned above for or on behalf of a legal entity.

Executive officer of a business or any other entity” — person acting as a sole executive body, member of the Board of Directors or any other collective executive body, or person performing organisational and executive, administrative and economic functions in these entities on a permanent or temporary basis or under a special mandate.

Self-interest — opportunity of the person to receive income while performing his/her employment or other duties in the form of financial benefit or any other undue advantage in the interest of the very person, his/her family members, or any other persons and entities that have personal, property, and any other relations with this person.

Company — Telko LLC, a legal entity incorporated and existing under the Russian Federation laws located at: Office 208, 37III, Professora Popova Street, St. Petersburg, 197022, OGRN (Primary State Registration Number): 1027801582808.

Responsible Officer — the person appointed pursuant to the requirements of the applicable labour laws as Company officer responsible for preventing corruption and other offences, enforcing the requirements hereof, and performing all other functions provided for hereby, by the other bylaws of the Company, and by the laws of the Russian Federation.

Employees— persons employed by the Company both by virtue of an employment contract and as a result of de facto employment relations (e.g.: under services contracts), the sole executive body, members of the collective executive body, and any other persons acting for or on behalf of the Company.

- 2.2. For the purposes hereof, representation of the terms listed above in uppercase or lowercase letters should not be viewed as an attempt to endow them with a meaning other than the meaning

provided above.

- 2.3. Any other terms herein should be interpreted in accordance with their definition provided by the Russian Federation laws or in accordance with their normal meaning.

3. BASIC PRINCIPLES

- 3.1. The Company is committed to the principles of zero tolerance to any corrupt business practices.
- 3.2. All Company employees undertake not to give, offer, or promise an illegal gratification to any third party, in particular, an official, employee or representative of any entity, any other individual or legal entity, to induce this party to commit any actions (omissions) to the benefit of the Company or person giving (offering, promising) this gratification.
- 3.3. Illegal gratification is prohibited irrespective of whether such gratification has been given in person by the employee, via an agent, or through an intermediary. Any instances when a Company employee gives, promises, or offers an illegal gratification in disregard of the requirements hereof shall be viewed as actions committed exclusively to the benefit of this employee.
- 3.4. As it carries out its activities, the Company strives to observe the ethical standards of conduct, maintain high professional business standards, create and maintain an atmosphere of trust and mutual respect, follow the principles of fair competition, and respect the principles of objectivity and honesty when making HR decisions. The basic principles of ethical conduct are outlined in Section 5 hereof.
- 3.5. The Company employees should do their best to avoid any situations that may involve a conflict of interest. In case of a conflict of interest, the Company employee must immediately put a hold on his/her actions that are in conflict herewith and notify the Responsible Officer thereof. The principles used to resolve and prevent a conflict of interest are specified in Section 6 hereof.
- 3.6. The Company manages financial transactions with due accuracy and diligence. Financial transactions should be recognised in sufficient detail and be reasonably available for review.
- 3.7. The Company interfaces with government authorities (including law-enforcement agencies), organisations, as well as with citizens and civil society institutions for the sake of effective corruption control. The Company undertakes to report any corruption offences to law-enforcement agencies. In addition, the Company provides the authorised representatives of oversight and law-enforcement agencies with assistance during the inspection audits of the Company's activities.
- 3.8. In case of any valid doubts about the legality and ethical nature of specific actions or circumstances and in case of revealing any instances of such actions and circumstances, the relevant employee must immediately notify the Responsible Officer thereof.
- 3.9. The Company strives to assess corruption risks on an ongoing basis in order to identify the specific business processes and business transactions in the Company's activities characterised by the highest probability that the Company employees will commit corruption offences. The Responsible Officer analyses the Company's risks and uses this analysis to prepare a summary overview of the critical points and potential offences as appropriate.

4. INTERFACE WITH THIRD PARTIES

- 4.1. As it carries out its activities, the Company engages in direct interface with third parties (counterparties, officials (public servants), customers, contractors, and other parties). In the course of such interface, the Company employees should abstain from any actions (omissions) that may be qualified as corrupt practices.
- 4.2. **Counterparties.** Prior to making the decision to engage in or continue cooperation with an intermediary, agent, or any other counterparty, prior to making the decision to engage in a joint venture, the Company should:
 - (i) Collect and analyse the information about the counterparties, their reputation, whether they have adopted similar anti-corruption policies and whether they have a conflict of interest;

- (ii) Make them aware of the principles and rules stipulated hereby.

The Company shall strive to develop its relations with counterparties based on the principles and rules set forth herein. The Company hereby urges its counterparties to incorporate special anti-corruption clauses in contracts (and other documents).

- 4.3. **Sponsorship and Charity** Despite the fact that sponsorship and charity normally serve a noble cause, these activities may be qualified as abusive practices under the anti-corruption laws. To minimise the risks associated with sponsorship and charity, the Company should observe the following principles:

- (i) Sponsorship or charity should be aimed at the benefit of the public;
- (ii) It is advisable to direct sponsorship or charity towards reputable entities or persons;
- (iii) The Company should take into account the Responsible Officer's opinion when making the decision to engage in sponsorship or charity;
- (iv) The Company may not engage in sponsorship or charity with a view to gaining an undue advantage;
- (v) The Company may not engage in sponsorship or charity when instructed (urged) to do so by officials or executive officers of a business or any other entity.

- 4.4. **Gifts and Hospitality.** Considering that in the normal course of business, the Company employees may give or accept gifts, the Company encourages the atmosphere of honesty and transparency with respect to business gifts and hospitality expenditure. Gifts and hospitality expenditure should meet the following criteria:

- (i) They should be directly associated with the Company's interests, for instance, a presentation or conference, completion of a business project, successful implementation of a contract, or with general holidays;
- (ii) They should be reasonable, commensurate, and they should not qualify as a luxury item;
- (iii) They should not represent a concealed gratification for a service, action, omission, connivance, patronage, granting of rights, certain decision on a transaction, agreement, licence, permit, etc. or an attempt to influence the recipient for any other illegal or unethical purpose;
- (iv) They should not create any reputational risks for the Company in case the information about such gifts and hospitality expenditure becomes public;
- (v) They should not be in conflict with the principles and rules hereof, any other bylaws of the Company, and applicable statutory provisions.

Gifts and hospitality expenditure may not take the form of cash or non-cash payments, securities, or precious metals.

Gifts in the form of merchandise (inexpensive articles) with the Company's logos displayed at exhibitions, open presentations, fora, and during other representational and marketing activities are accepted and qualify as marketing materials.

- 4.5. **Involvement in Politics.** The Company does not engage in politics with an express or consequential purpose to influence the decisions affecting the Company's activities by officials, executive officers of a business or any other entity, politicians, non-governmental organisations, and any other parties.

The Company abstains from involvement in politics whenever such involvement may create reputational risks for the Company. If the Company chooses to engage in politics, it should ensure a transparent accounting of expenses incurred thereby and the very information about such expenses should be made available to a reasonable extent.

The Company does not provide any financial and other types of welfare assistance to the Company employees in connection with their engagement in politics.

5. BASICS OF BUSINESS ETHICS

- 5.1. In their day-to-day activities, the Company employees should strive to abide by the ethical principles listed below:
- (i) Comply with the requirements of the applicable anti-corruption laws and the requirements and rules hereof in full, and when dealing with matters that are not covered by the applicable laws, proceed from the principles of integrity, reasonableness, and fairness;
 - (ii) Be honest and fair in business relations, abstain from any unfair business practices;
 - (iii) Abide by the principle of zero tolerance to corruption in all forms and manifestations;
 - (iv) Respect the property right, strive to balance mutual benefit when making transactions;
 - (v) Abstain from using office, confidential information, the Company's tangible and intangible assets for personal purposes;
 - (vi) When making decisions, be guided by the results of a thorough and all-out examination of the situation, take both economic expediency and interests of the other parties concerned into account;
 - (vii) Abstain from unethical competition practices;
 - (viii) Abstain from actions (omissions) that give rise to conflicts in business relations, strive to resolve conflicts (if any) by balancing the business entities' interests.

6. CONFLICT OF INTEREST

- 6.1. Timely detection of a conflict of interest in the Company employees' activities is among the cornerstones hereof.
- 6.2. The Company's primary task in preventing and resolving the conflict of interest is to limit the influence of employees' vested interests, self-interest on their job functions and job-related decisions made thereby. In this context, it should be remembered that the conflict of interest may take a variety of forms (specific examples of conflicts of interest are provided in Appendix 3 hereto for reference purposes).
- 6.3. With a view to preventing and resolving the conflict of interest in its activities, the Company may develop and adopt a regulation on the conflict of interest. Development of this regulation falls within the Responsible Officer's competence. Before this regulation is adopted, the Company employees should be guided by the principles and rules set forth herein.
- 6.4. To prevent conflicts of interest, the Company proceeds from the following principles:
- (i) Mandatory disclosure of information about any real or potential conflict of interest by the Company employees;
 - (ii) Individual consideration and assessment of risks for the Company when detecting and resolving each individual conflict of interest;
 - (iii) Confidentiality of disclosure about the conflict of interest and resolution thereof;
 - (iv) Balance of the Company's and employees' interests when resolving the conflict of interest;
 - (v) Protection of the employee against the consequences of reporting a conflict of interest disclosed by the employee and resolved (prevented) by the Company in a timely manner.

The principles listed above may be extended to cover the individuals and legal entities cooperating with the Company under civil law contracts. In this case, the relevant provisions should be incorporated in the text of the contracts.

- 6.5. In order to resolve and prevent a conflict of interest, the Company employees must act as follows:
- (i) When making decisions on organisational matters and performing their employment duties, be guided by the Company's interests without regard for their personal interests and interests of their relatives and friends;

- (ii) Avoid (as reasonably possible) any situations and circumstances that may result in a conflict of interest;
 - (iii) Disclose an actual (real) or potential conflict of interest;
 - (iv) Contribute to the resolution of an actual conflict of interest.
- 6.6. In case of detecting a real or potential conflict of interest, the Company must make a decision on the need to resolve such conflict and use a variety of methods to resolve it, including:
- (i) Limiting the employee's access to the information that may touch upon the employee's personal interests;
 - (ii) Securing the Company employee's voluntary abstention or disqualifying the relevant employee (either on a permanent or temporary basis) from involvement in discussions and decision-making on matters that fall or may potentially fall under the influence of the conflict of interest;
 - (iii) Revising and modifying the employee's functional duties;
 - (iv) Suspending the employee on a temporary basis when his/her personal interests are in conflict with his/her functional duties;
 - (v) Reassigning the employee to another position with the functional duties unrelated to the conflict of interest;
 - (vi) Securing placement of the employee's property giving rise to the conflict of interest in trust;
 - (vii) Securing the employee's abandonment of his/her self-interest engendering the conflict with the Company's interests;
 - (viii) Dismissing the employee from the Company at the employee's initiative;
 - (ix) Dismissing the employee from the Company at the employer's initiative for a disciplinary offence, that is for non-performance or improper performance by the employee of his/her employment duties.

The list of methods to resolve a conflict of interest listed above is not exhaustive. In each individual case, the Company and the employee disclosing the information about a conflict of interest may agree to use other ways to resolve such conflict.

- 6.7. The officer responsible for accepting the information about an actual conflict of interest and examining this information is the Responsible Officer. When after examining the information received thereby, the Responsible Officer concludes that the situation in place represents a conflict of interest and requires special measures, the Responsible Officer must notify the Company management thereof and the latter shall make the final decision concerning the resolution method.

7. RESPONSIBLE OFFICER

- 7.1. The officer responsible for enforcing the requirements hereof in the Company is the Managing Director of the Company, except as the Company appoints a different Responsible Officer by the order on anti-corruption measures.

- 7.2. The Responsible Officer's duties comprise:

- (i) Enforcing this Policy;
- (ii) Interfacing with the Company employees with a view to clarifying the principles and rules hereof;
- (iii) Accepting and examining the employees' reports on any attempts to induce them to corruption offences and any other reports provided for hereby;
- (iv) Arranging for the assessment of corruption factors and risks associated with the Company's activities; Reporting all such instances to the Company management;
- (v) Making the Company employees aware of the key trends in the evolution of anti-

corruption laws and law-enforcement practice;

- (vi) Assisting the authorised representatives of the law-enforcement agencies with activities intended to suppress or investigate corruption-related crime, including investigative activities;
- (vii) Notifying and advising the Company management on general anti-corruption matters.

Additional duties may be assigned to the Responsible Officer by the special Sections hereof and by his/her job description.

8. NOTIFICATION

- 8.1. If an employee has doubts about the legality of his/her actions or doubts about any other ethical issues, such employee should seek advice from the Responsible Officer. If the Responsible Officer is absent (including due to non-appointment), the employee should contact his/her immediate superior.
- 8.2. The Company employees must notify the Responsible Officer on any instances when they were contacted by any persons with a view to inducing them to corrupt practices.
- 8.3. The Company represents that no sanctions will be imposed on any employee (including dismissal, demotion, or revocation of a bonus) for reporting a suspected instance of corruption or for refusing to give or take a bribe, trade in influence, deliver an illegal gratification, or mediate in bribery, trading in influence, or delivery of an illegal gratification, including when such refusal results in lost profits or failure to secure business and competitive advantages on the part of the Company.
- 8.4. The Company urges its employees, counterparties, and other third parties concerned to report their suspicions about any potential breach of the rules set forth herein and propose recommendations on improvements in the anti-corruption system as soon as possible.
- 8.5. All reports on the instances of corruption and recommendations on improvements in the anti-corruption system should be delivered to the following officers:
 - Responsible Officer;
 - Immediate superior;
 - Company Director.
- 8.6. An instance of corruption may be reported either verbally or in writing (in the form of an office memo or by email to the Company Director).
- 8.7. The Company warrants all employees and other persons duly reporting the corruption offences that it will not disclose the very fact and content of the relevant report.

9. LIABILITY

- 9.1. The members of the management bodies, employees of all Company units, notwithstanding their position, are liable in accordance with the applicable laws of the Russian Federation for the breach of the principles and rules hereof, as well as for the actions (omissions) committed by their subordinates in breach of such principles and rules.
- 9.2. The persons guilty of breaching the requirements hereof, may be brought to disciplinary, administrative, civil law, or criminal liability at the initiative of the Company, law-enforcement agencies, or other parties in the manner and on the grounds provided for by the Russian Federation laws, the Company's Articles of Association, bylaws, and employment contract.

10. FINAL PROVISIONS

- 10.1. In case of revealing any provisions hereof that are not sufficiently effective or if the requirements of the applicable laws of the Russian Federation change, the Responsible Officer shall arrange for the development and implementation of the action plan to update the Company's Policy.
- 10.2. In addition to the measures stipulated hereby, the Company may use other measures to prevent and control corruption, including: introduce the relevant procedures to protect the employees reporting corruption offences against official and unofficial sanctions, introduce the requirement to present a conflict of interest declaration on an annual basis, assess the corruption risks from time to time, organise training activities (workshops, lectures, trainings) for the employees, carry out a periodic external audit, ensure an ongoing control of economic viability of the expenditure in the areas exposed to a high corruption risk, conduct an ongoing anti-corruption performance evaluation, and other relevant activities.

APPENDIX 1. Self-Evaluation Questions

Prior to making any payment or delivering a gratification in any other form, the employee should review the answers to the questions below in order to establish the legality and ethic nature of the intended action. In case of any doubts about the ethical nature and legality, the employee should report the transaction in compliance with Section 8 hereof.

1. Is the person involved an official or executive officer of a business or any other entity?
2. What is the reputation of the payment recipient?
3. What is the purpose of the gratification to be delivered (settlement under a contract, payment for a service, advance payment, state due, etc.)? What is expected in exchange? Is it legal?
4. Can the payment to be made be qualified by outside observers as an attempt to induce the recipient to perform certain actions (omissions) to the benefit of the Company?
5. Will the relevant payment be duly recognised in the Company's accounting documents?
6. How many people are aware of the payment to be made? Does the payment have any marks of secrecy?
7. How will the public react if the information about this payment is disclosed?
8. Are there any attributes of potentially risky situations mentioned in Appendix 2 hereof?

This list of questions is not exhaustive. Any Company employee should use due diligence and caution at its own initiative and consider the other aspects that may be significant in each individual situation.

APPENDIX 2. Potentially Risky Situations: Some Precedents

This list of potentially risky situations contains examples of situations or circumstances that should give rise to the employee's suspicions about the legality and ethical nature of the actions to be performed. This list is not exhaustive.

1. Request to make a payment to the benefit of the parties that are not directly involved in the relevant transaction;
2. Request to make a payment in cash;
3. Transfer of cash to bank accounts with banks located in the countries where neither party (party's intermediary) is located;
4. Excessive payment amount or obvious mismatch between the payment amount and the consideration;
5. Transfer of excessive amounts under consulting services contracts;
6. Lack of a detailed description of the services provided;
7. Lack of the documents normally executed in similar circumstances;
8. Use of untried agents, representatives, or intermediaries;
9. Engagement of an agent or adviser at the behest of an official;
10. Engagement of an agent or adviser that used to serve as an official in the past;
11. Coverage of an official's or partner's travel costs, provision of uncompensated services (e.g.: vacation arrangements, hotel reservation), including to the benefit of their relatives;
12. Request for sponsorship or charity to the benefit of a specific legal entity or individual;
13. Cooperation with persons with a reputation of "fixers";
14. Pursuit of activities in countries with a high level of corruption.

APPENDIX 3. Representative Conflict-of-Interest Situations

Situation description	Examples
While performing his/her employment duties, an employee of A is involved in making decisions that can bring a tangible or intangible benefit to persons who are his/her relatives, friends, or persons related to his/her self-interest.	A bank employee making the decision to issue a bank loan makes this decision with respect to his/her friend or relative.
An employee of A is involved in making HR decisions concerning the persons who are his/her relatives, friends, or persons related to his/her self-interest.	A superior makes a decision to raise the salary (pay a bonus) to its subordinate who is his/her relative.
An employee of A or any other person related to the employee's self-interest is working or is planning to work for B for consideration when B has business relations with A, is planning to establish such relations, or is A's competitor.	<p>A company employee responsible for the procurement of tangible production assets selects the supplier from a limited range. A manager of the sales department in one of potential suppliers is a relative of the company employee.</p> <p>A company employee enjoying access to confidential information about the company's activities receives a job offer from a company that is a competitor of his/her immediate employer.</p>
An employee of A or any other person related to the employee's self-interest is working or is planning to work for B for consideration when B is A's parent company or subsidiary or is otherwise affiliated with A.	An employee of A has a second job with B when B is A's subsidiary. At that, the employee's employment duties in A provide for oversight functions with respect to B.
An employee of A makes a decision to procure products constituting intellectual property for A when the employee or any other person related to the employee's self-interest has exclusive rights to such products.	An employee of a company providing the population with transportation services in the area of public transport makes a decision to procure automated passenger control systems based on the engineering developments when the patents to such developments belong to the employee.
An employee of A or any other person related to the employee's self-interest holds the securities of B when B has business relations with A, is planning to establish such relations, or is A's competitor.	<p>An employee of A makes a decision to invest A's funds.</p> <p>The funds are supposed to be invested in B and B's securities are held by the employee.</p>

An employee of A or any other person related to the employee's self-interest has financial or property liabilities to B when B has business relations with A, is planning to establish such relations, or is A's competitor.

An employee of A has loan liabilities to B when the employment duties of this employee include decision-making on raising debt capital.

An employee of A makes decisions to establish (maintain) business relations between A and B when B has financial or property liabilities to the employee or any other person related to the employee's self-interest.

B has a debt liability to an employee of A for the use of products constituting intellectual property when the employee or any other person related to the employee's self-interest has exclusive rights to such products. At that, the duties of such employee include decision-making on matters of maintaining or terminating business relations between A and B when B is extremely interested in maintaining such relations.

An employee of A or any other person related to the employee's self-interest receives material benefits or services from B when B has business relations with A, is planning to establish such relations, or is A's competitor.

An employee of A whose employment duties include quality control of the products and services delivered by A counterparties is granted a substantial discount for B's products when B is A's supplier.

An employee of A or any other person related to the employee's self-interest receives expensive gifts from his/her subordinate or another employee of A when the former employee's employment duties provide for oversight functions with respect to the latter employee.

A company employee receives an expensive gift from his/her subordinate when the employee's employment duties provide for making decisions to raise salary to his/her subordinates and promote them in the company.

An employee of A is authorised to make decisions to establish, maintain, or terminate business relations between A and B and B makes a job offer to such employee.

B is interested in making a long-term industrial and office lease agreement with A. B makes a job offer to the employee of A authorised to make the decision on the conclusion of the lease agreement or to any other person related to the self-interest of such employee.

An employee of A uses the information that he/she becomes aware of while performing his/her employment duties to derive a benefit or competitive advantages in business transactions for himself/herself or for any other person related to the employee's self-interest.

An employee of A, a company engaged in exploration and production of natural resources, announces A's interest in the purchase of land plots to the owner of these land plots when such owner is a friend of this employee's.
