

ANTI-RETALIATION/REPRISAL POLICY STATEMENT

JSC Concern Galnaftogaz ("GNG" or "Company") has a zero-tolerance policy on reprisals, retaliations, revenges and similar retributive actions. We don't tolerate any actions (including threats, intimidation, harassment or other violence) that could be used for referring and guiding our staff and construction contractors—against those who voiced their opinion regarding activities of our company.

No person shall be subject to retaliation, reprisal or retribution for participation in employment process or speaking out against practices that according to their beliefs might constitute an unlawful discrimination. Retaliation/reprisal are completely unacceptable, unlawful and will not be condoned or tolerated among GNG's staff and employees. .

Retaliation/Reprisal is defined hereby as any negative treatment or adverse action imposed on an individual for engaging in protected activity. Protected activity includes, inter alia, filing a charge of discrimination, participation in an employment discrimination proceeding, or otherwise opposing unlawful discrimination. GNG's managers and supervisors bear a special duty and responsibility to ensure that they do not engage in or tolerate retaliation/reprisal in the workplace.

An employee, former employee, applicant for employment, or construction contractor, who believe they were subject to discrimination based on retaliation/reprisal, should contact the Senior Risk Manager (SRM) to initiate a complaint of discrimination based on retaliation/reprisal.

An aggrieved person must file a claim with SRM within 45calendar days from adate of alleged reprisal or retaliation. Any supervisor found guilty of any kind of engaging in retaliation/reprisal will be subject to an appropriate disciplinary action(including reprimand, demotion, suspension, or removal).

If you have a question or need assistance, please contact the Senior Risk Manager at 032 298-96-01 or by email at: RSyvyj@lawwhales.com.

Nazar Kupybida

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CONCERN GALNAFTOGAZ, JSC