

Approved
December 2, 2011

**SHTOKMAN DEVELOPMENT AG
CORPORATE SOCIAL RESPONSIBILITY POLICY**

SHTOKMAN DEVELOPMENT AG POLICY OF CORPORATE SOCIAL RESPONSIBILITY

In accordance with the environmental and social performance standards of the International Financial Corporation and in compliance with the law of the Russian Federation, Shtokman Development AG (the Company) makes a commitment to the principles of social responsibility and sustainable development and adopts an integrated approach to the economic, social and environmental aspects of its operations.

Objectives in the Social Responsibility domain

Our objectives in the Social Responsibility domain are to support sustainable development through compliance with the Company's governing documents regarding HSE, Business ethics, Procurement, Russian Content.

The Company conducts its operations in strict compliance with the following principles:

- Company's decisions affecting external stakeholders shall take into account the stakeholders' interests and concerns; in particular, the decisions shall be supported by thorough social and environmental assessments and management plans.
- The Company will deploy a transparent grievance mechanism for the external stakeholders.
- The Company and its contractors and suppliers will implement all economically feasible measures to identify and minimize economical, social and environmental risks and pursue social and environmental opportunities in their business activities, with the view of continuously improving their sustainability performance.
- The Company and its contractors and suppliers will implement all economically feasible measures to promote opportunities for local and regional population and enterprises to participate in the Shtokman project, through use of local workforce, goods and services and development of competences of local workforce.
- The Company maintains constructive interaction with the authorities on federal, regional and local level and with local communities, promoting joint activities to address relevant social, economic and environmental issues.
- The Company ensures availability and transparency of information on Company activities throughout the duration of the Shtokman project.
- The Company respects its employees' personality and rights and implements transparent Human Resources policy.
- The Company and its contractors and suppliers respect human rights, in particular, rights of indigenous people.
- The Company promotes employees' awareness, competence and knowledge in the area of Corporate Social Responsibility.