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Approved under
Decree of CMB LLC
Dated 10.06.2019 No.29

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REGULATIONS FOR PREVENTION AND SETTLEMENT OF A CONFLICT OF INTEREST OF CMB LLC

1. General Provisions.

1.1. These Regulations for prevention and settlement of a conflict of interest of CMB LLC (hereinafter referred to as the Regulations) have been developed in compliance with Article 13.3 of Federal Law dated December 25, 2008, No. 273-FZ «On the Corruption Control», the Anti-Corruption Action Plan approved under Decree of CMB LLC (hereinafter referred to as the Company) dated 10.06.2019 No.28, and other effective statutory instruments concerning corruption prevention, identification and settlement of conflicts of interest.

1.2. These Regulations shall establish the procedure for identification and settlement of conflicts of interest arising with the employees of the Company in the course of discharging their employment duties.

2. Notions and Definitions.

2.1. Conflict of interest – a situation, where an employee carrying out its occupational activities has a personal interest in gaining, either personally or through a company's representative, a financial benefit or another advantage that influences or may influence his or her discharge of the occupational duties due to a conflict between the personal interest of the employee and the proper discharge of the employment duties.

In case of a conflict of interest, the employee shall report this to Chief Executive Officer of the Company in writing.

3. Goals and objectives of the Regulations

3.1. A goal of prevention and settlement of a conflict of interest for the Company shall be to avoid corrupt practices in the employee activities.

3.2. A central goal of the Company's activities to prevent and settle a conflict of interest shall be to restrict the influence of private interests, personal interest of the employees, on their employment duties discharged and business decisions taken

4. Persons falling within the scope of the Regulations.

4.1. These Regulations shall extend to all employees having an employment relationship with the Company, irrespective of the position held, service record, and other conditions.

5. Basic principles of managing a conflict of interest of the Company.

5.1. The following principles shall be underlying the efforts to manage a conflict of interest of the Company:

- commitment to disclosure of an actual or potential conflict of interest;
- individual consideration and assessment of reputations risks to the Company upon

identification of every conflict of interest, and settlement of the same;

- confidentiality of the process of disclosure of a conflict of interest and the process of settlement of the same;
- balancing the Company's and the employee's interests when a conflict of interest is settled;
- protection of an employee against harassment relating to a report on the conflict of interest that was disclosed promptly by the employee and settled (prevented) by the Company.

6. Procedures for disclosure of a conflict of interest by an employee of the Company and settlement, including potential ways to settle an existing conflict of interest.

6.1. The Company has established the following modes of disclosure of a conflict of interest:

- disclosure of a conflict of interest at the time of hire;
- disclosure of a conflict of interest at the time of appointment for a new position;
- disclosure of a conflict of interest in case an appropriate situation has occurred.

6.2. Disclosure of a conflict of interest shall be made in writing. Initial disclosure of a conflict of interest shall be admissible in oral and followed then by a statement in writing.

6.3. The Company shall warrant full confidentiality when considering the data presented and settling a conflict of interest.

6.4. To settle a conflict of interest, the Company shall set up a Board for Settlement of a Conflict of Interest (hereinafter referred to as the Board), which members shall be approved under a decree.

6.5. The information received shall be examined carefully by the Board in order to assess the severity of risks arising to the Company and choose a most suitable mode for settlement of the conflict of interest.

6.6. Following the examination of the information received, the Board may take one of the following decisions:

- the situation reported by the employee is not a conflict of interest and needs no special method of settlement;
- a conflict of interest has occurred.

6.7. In case a conflict of interest has occurred, the Board may exercise different methods to settle the same, including:

- limitation on the employee's access to specific information that can affect the personal interests of the employee;
- voluntary denial or removal (either permanent or temporary) of the employee from participation in the decision-making discussion and process concerning the issues that are or can be affected by the conflict of interest;
- revision or modification of the functional duties of the employee;
- temporary removal of the employee from the office, if his or her personal interests are in conflict with the functional duties;
- reassignment of the employee to another position providing for performance of the functional duties that are not relating to the conflict of interest;
- denial of the employee from his or her personal interest engendering the conflict with the interests of the Company;
- dismissal of the employee from the Company as initiated by the employee;
- dismissal of the employee as initiated by the Company in case of nonperformance or improper performance by the employee of the employment duties imposed thereon.

6.8. The above-mentioned list of methods to settle a conflict of interest shall not be exhaustive. As the case may be, other modes of settlement may be found upon agreement between the Company and employee disclosing a conflict of interest.

6.9. When settling an existing conflict of interest, a «mildest» settlement step shall be

chosen of the possible ones on a case-by-case basis. «Stronger» steps shall be only used where this is caused by the actual need or where the «mild» steps appeared to be ineffective.

6.10. Decision-making on the choice of a specific method to settle a conflict of interest shall consider an amount of the employee's personal interest and a probability that the personal interest will materialize to the prejudice of the Company's interests.

7. Duties of employees in relation to disclosure and settlement of a conflict of interest.

7.1. All of the Company's employees shall, irrespective of the position held, service record, and other conditions, perform the duties relating to disclosure and settlement of a conflict of interest:

- when making decisions on business matters and performing their employment duties, follow the Company's interests, without regard to their personal interests, those of their relatives and friends;
- avoid (if possible) the situations and circumstances, where their personal interests will be in conflict with those of the Company, which can result in a conflict of interest;
- disclose an existing (actual) or potential conflict of interest;
- assist to settlement of an existing conflict of interest.

8. Persons responsible for reception and examination of information on an existing conflict of interest.

8.1. The officer responsible for reception of information on the occurring (existing) conflicts of interest shall be a person responsible for prevention of corruption and other offences and for implementation of the anti-corruption policy.

Any information (statement) on the occurring (existing) conflicts of interest shall be recorded, within one business day as from receipt, on the Company's Log of Information on Occurring (Existing) Conflicts of Interest to be laced, numbered, and attested by signature of Chief Executive Officer of the Company and its common seal affixed.

8.2. The information received shall be examined jointly by the Board.



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