

MobiDram

Code of Business Conduct with Suppliers

Message from the General Manager

Dear partner,

MobiDram reiterates its commitment to doing business in compliance with international standards, and fully in line with generally accepted anti-corruption laws, regulations and ethical norms of fair entrepreneurship. We emphasize once more our pledge to acting with transparency, integrity and professionally on all levels of business, including the selection of suppliers and partners. MobiDram spares no effort to contribute into building healthy business milieu and amelioration of the social environment in the country at large.

Thus, we urge you to join us in building business relations and performing in harmony with the mentioned approaches at all time.

Kim Avanesyan
MobiDram CJSC General Manager

Preamble

The MobiDram Code of Business Conduct with Suppliers describes the internal corporate standards of conduct and rules of engagement of MobiDram employees with business partners and external stakeholders. The current document sets the minimum standards and requirements adopted by the Company in order to promote fair and ethical business practices and to prevent any violation.

The Code specifies the following:

- MobiDram does not apply illegal child labor or forced labor and do not acknowledge the application of it;
- Misuse of the position for personal benefit is strictly prohibited at MobiDram;
- MobiDram adheres to the anticorruption legislation including the Armenian anti-corruption legislation, US anti-corruption legislation, UK Bribery Act 2010 as well as other applicable legislation of the territories where the Company is running its business/presented;
- Any acts contrary to customs and tax laws are strictly prohibited at MobiDram;
- MobiDram follows the aspects of the protection of intellectual property and other rights holders;
- MobiDram follows the business ethics in all aspect of business communication with the partners, suppliers etc.

Corporate Social Responsibility

Corporate social responsibility (CSR) is the responsibility of the organization for the impact of its decisions and operations on society and the environment through transparent and ethical conduct. Our primary goal is to improve the quality of life and safety of human and society by developing innovations and offering a broad spectrum of services to our customers. We are responsible for our own actions, and we see this as the guarantee of the Company's sustainable development.

MobiDram addresses the requests of society, consumers, shareholders, its employees, the state, partners and suppliers.

MobiDram activities regarding CSR involves working in the following areas:

- improving the quality of life of the subscribers;
- concern for the employees and their development;
- responsible business practice;
- information security and data protection.

Working Environment

The rules of our Company strictly prohibit harassment and bullying, including hints of sexual or physical proximity, hindering the work of another person or creating the atmosphere of fear, animosity or tension at the workplace.

MobiDram commits to provide its employees and any person who enters the MobiDram premises with safe office conditions.

Compliance with Laws, Rules and Regulations

At MobiDram it is not allowed to violate the laws, rules and regulations, as well as policies and procedures of the Company such as anti-corruption legislation, violation of laws on intellectual property, violation of laws on trade mark, commercial secret, information secret and confidentiality of personal data, conclusion of any bargain of use of insider information, illegal transfers to the benefit of political parties, governmental authorities or companies, violations of antimonopoly regulations, harmful influence on the environment, any violation of work and safety conditions/rules, providing wrong or incorrect financial information, non-authorized use of Company property.

Conflict of Interest

MobiDram prohibits all types of conflicts of interest. A conflict of interest may arise when personal interests are involved or at stake, and when relevant decisions may negatively affect the Company's interests.

Conflicts of interest can take various forms. The following are some examples of such conflicts:

- The MobiDram employee is the co-owner of the company, which is the counterpart, the supplier or the vendor of MobiDram
- The MobiDram employee accepts gifts or invitation to attend entertainment events or anything else that has value from a MobiDram supplier or vendor
- The MobiDram employee has family interests, in which a spouse, child, or other close relative is employed (or applies for employment) or where goods or services are purchased from such a relative or a company is controlled by the employee's relative.

These and similar situations should be avoided.

Illicit Payments

MobiDram Anti-corruption Policy defines the requirements for abidance of the provisions of applied anti-corruption legislation.

The laws and respective regulations prohibit to directly or indirectly make payments or transfer any valuables, as well as offer, promise or authorize payments or transfer of valuables to governmental authorities, political parties, or candidates for governmental positions in order to have influence on government actions or formal solutions in order to obtain a permit for carrying out or continuation of business activities or illegal advantage.

Gifts, Trips and Entertainment Activities

MobiDram policy prohibits accepting significant gifts or any other business courtesy (including discounts or benefits that are not made available to all employees) from any of MobiDram customers, suppliers, partners or competitors. No MobiDram employee is allowed to receive personal financial benefit, gifts or services due to their position or responsibility in the Company irrespective of the occasion and amount, with the exception of promotional branded items (i.e. pens, calendars, agendas, note pads, mugs).

MobiDram employees are allowed to visit sometimes business and entertaining events being invited by third parties. While visiting such events the invited party should be accompanied with the inviting person, the events should be appropriate, of reasonable cost and content, upon approval of the management. Travel and accommodation expenses (in case if the invitation is out of the residency location of the Company's employee) should be covered by the Company and not the inviting party. Such rules apply if the inviting party is a valid counterparty or procurement participant, and if the inviting party is a participant in the procurement procedures or an active counterparty of MobiDram.

Business Conduct

Relations with suppliers

All the suppliers of MobiDram should be treated via fair competition or bidding. There should be an inclusive, independent, objective and fair consideration of the supplier qualification, product/service quality, reputation through tender or other fair/reasonable means based on MobiDram Purchasing internal norms.

The suppliers are required to:

- Abide by the laws and regulations against unscrupulous competition or monopoly/corruption/bribing;
- Not offer bribes, discounts through unauthorized repayments, or material benefits.

The MobiDram employees are required to:

- Adhere to MobiDram corporate culture and respect the corporate culture of the supplier, treat suppliers and their representatives in an accepted etiquette, and keep confidential the information of the supplier as mutually agreed and legally regulated;
- Protect legal interests of the Company, and reject bribes, discounts through unauthorized repayments, or material benefits offered by a supplier.

Relations with regulatory authorities

In respect of the relationship with regulatory authorities the employees of MobiDram should consider the anti-corruption rules of the government officers. It is prohibited to offer any benefit to regulatory officers that may influence their just judgment. The MobiDram employees are prohibited to bribe any regulatory officer (directly or indirectly) in the name of the Company.

Relations with mass media

MobiDram General Manager is the only unit that provides information to the mass media. Any request of information related to the number of subscribers, company's revenues, investment size and other information about company's activities should be referred to the MobiDram General Manager.

Intellectual Property

Any value, recognized as an intellectual property of the Company should not be used or reproduced, without the formal written authorization by MobiDram management. Intellectual property is any product that belongs to the Company – any text, design, report, manual, method, algorithm, software, code, which has been manufactured or produced for MobiDram.

Confidentiality regime

Our work environment or work nature may give the MobiDram employees access to classified company-related information, whether related to customers, vendors, Company partners or even staff. Any such information is the sole property of MobiDram. It is mandatory for all employees to maintain the highest degree of integrity when it comes to their work, including dealing with Company-related clients.

Employees must respect MobiDram customers and the personal data of all the customers (including vendors, partners and staff), and it is our responsibility to duly protect the confidentiality of their personal information. The employee should use any confidential information directly related to own job solely for the purposes defined by the Company and do not discuss it in places where it can be heard by an unauthorized people.

All Company-related information belongs to MobiDram CJSC and it is forbidden to be used for personal purposes. MobiDram staff is obliged to obey with the requirements of the RA legislation on the protection of commercial secret.