

Policy

“Compliance with Anticorruption Legislation”

1. DOCUMENT INFORMATION

Purpose of the Document	<ul style="list-style-type: none">• To establish the standards of responsible business behavior, to implement and develop best corporate governance practices;• To demonstrate the Company’s commitment to the principles of legality, transparency and social responsibility;• To outline the principles aimed at preventing any form of corruption and compliance with the requirements of the Applicable Anticorruption Legislation in the course of conduction of business activity by the Company in any country in the world;• To raise the level of corporate compliance culture in the Company and MTS Group, as well as to raise awareness of the Persons covered by the Policy of the risks of corruption and to assist in clarifying and observing the rules.
Document Overview	<ul style="list-style-type: none">• Establishing key principles and requirements for compliance with the Applicable Anticorruption Legislation;• Determining the corruption risk areas and establishing approaches to overcome and/or mitigate them. The Policy addresses the risks of bribery and corruption in both public and private sectors.

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2. DEFINITIONS OF TERMS, ABBREVIATIONS AND ROLES

2.1. Definitions of terms and abbreviations

Term	Abbreviation	Term definition (abbreviation expansion)
Applicable definitions:		
Anticorruption Clause	ACC	Commitments, as well as warranties and representations of the party/parties to comply with the applicable anticorruption legislation.
Anticorruption Compliance (Anticorruption Compliance Program)		A system of actions and procedures developed by the Company for the purposes of ensuring compliance with the requirements of the applicable anticorruption legislation.
Interaction with Public Officials		Any contact (regardless of its format and duration) with a governmental official or a public organization.
Public Organization		Any state and administrating authority of the RA and foreign states, their constituent entities (including government ministries, services, agencies, government departments and their structural units) and local authorities; any political party; all legal entities directly or indirectly controlled by the state (Armenian or foreign); legal entities whose activities are perceived by society as the exercise of a public function for the state, except for the fulfillment of legal requirements; international public organizations.
Public Official	PO	Any Armenian or foreign, appointed or elected person holding or filling any position in the legislative, executive, administrative or judicial body or international organization; any person performing any public role for the state, including roles for a governmental institution; leading politicians, officials of political parties, including candidates for political posts, ambassadors, influential functionaries in nationalized industries or natural monopolies; managers and employees of state institutions, including doctors, military personnel, municipal employees, etc.; persons who are known to be related to a state official by kin or in terms of friendly or business relationships, and/or acting on behalf of and/or for the benefit of a public official.
MTS Group		MTS PJSC, all Subsidiary Companies of MTS PJSC, as well as all the companies under direct or indirect control of MTS PJSC.
Subsidiary Company	SC	a Company, in respect to which MobiDram, by virtue of dominant participation in its charter capital, or in accordance with the agreement entered into by and between MobiDram and the company, or otherwise is capable of determining resolutions made by such company (including the companies where MobiDram or a group of persons of MobiDram is able to use third parties to actually control votes falling on voting shares of which more than 50% of the charter capital of the company consists).
Bribe-Giving		A corrupt practice in the form of a transfer of any (valuable thing) to PO personally or through an intermediary (including the transfer of a bribe in the direction of an official to the other individual or a legal person).
Business Hospitality		The Company's expenses to welcome and serve representatives of other companies (including foreign companies), which participate in business events in order to establish and (or) maintain mutual cooperation, as well as similar expenses borne by another person for the Persons covered by the Policy. Business hospitality includes entertainment allowance and other entertainment expenses. Business hospitality of the Company includes the expenses for: <ul style="list-style-type: none"> • business breakfasts, lunches and dinners, including formal receptions, snacks and drinks; • travel and accommodation expenses related to business breakfasts, lunches, dinners, cultural and entertainment or professional events; • all forms of cultural and entertainment events, such as invitations (tickets) to sports, theater and cultural events or events organized under sponsorship of MobiDram (if such events are held outside the MTS Group);

Term	Abbreviation	Term definition (abbreviation expansion)
		<ul style="list-style-type: none"> expenses related to payment for visiting external (outside MTS group) professional events, such as conferences, trade exhibitions, training events, etc.
Abuse of Powers		A corrupt practice in the form of use by a person performing managerial functions in a commercial or other organization of its powers contrary to the legitimate interests of this organization and in order to derive benefits and advantages for himself/herself or other persons, or inflict harm to other persons, if such act resulted in causing significant damage to the rights and the legitimate interests of citizens or organizations, or the interests of society or the government protected by law.
Commercial Bribery		A corrupt practice in the form of illegal transfer to a person performing managerial functions in a commercial or other organization of money, securities, other property, any other valuable thing, as well as illegal provision of property services to such person, provision of other property rights (including transfer of property at the direction of such a person or provision of a service of a property nature, or granting of property rights to the other individual or legal entity) for performing actions (omission to act) in favor of a person committing commercial bribery or other persons, if such acts (omission to act) are within the official powers of such a person or if such a person, due to his/her official position, may facilitate the specified acts (omission to act).
Company		MobiDram CJSC which shareholder is “MTS Armenia” CJSC, which, in its turn, is the subsidiary of “Mobilnie Telesistemi” public stock company
Counterparty		Any legal entity or individual, including an individual entrepreneur, involved to perform actions on behalf of and/or in the interests of MoiDramor to deliver goods, perform work or provide services to MobiDram, including the procurement categories and the categories not related to procurement, including, but not limited to, sellers and suppliers; dealers and distributors; real estate owners and/or holders; professional services providers; consultants; agents, mediators and other parties. As part of the inspection of counterparties, third parties that are recipients of payments shall also be deemed to be the counterparties, regardless of whether such third parties are specified in the contract or not.
Conflict of Interest		A situation in which Personal Interest (direct or indirect) of the Person covered by the Policy, or the fact that such a Person or their Associates occupy positions in the management bodies of other organizations not being a part of MTS Group, affects or may affect proper, objective and impartial performance of their duties (exercise of powers) in the Company.
Corruption		An action undertaken by an individual or a legal entity that is related to offering funds, any financial benefits, advantages or value in the forms of giving and (or) taking a bribe or commercial bribery, mediation in bribery or commercial bribery, abuse of power and in any other forms that are recognized as corrupt, in order to influence any act (omission) of the taker and to induce to perform the employment duties in an inappropriate way and/or to obtain any improper commercial or other advantage or benefit and (or) to obtain reward for the improper performance of such duties.
Local Regulation	LR	A document containing generally binding standards of conduct within the Company, which the Company adopts within its competence in accordance with laws and other regulatory legal acts.
Facilitation Payment		Payments or other benefits that are not provided for by applicable law or other regulations and which are offered in order to facilitate or simplify the standard procedure (action) to which the payer has the right in accordance with the law, a contract or on other grounds.
Gift		Anything of value transferred or received by the Company, as well as by the Persons covered by the Policy, at no cost.

Term	Abbreviation	Term definition (abbreviation expansion)
Political Sponsorship (financing of political activities)		Assistance in monetary or any other form, provided in support of Government organizations (including parties), their employees, Governmental Officials or candidates for such positions.
Acceptance of a Bribe		A corrupt practice in the form of receiving by PO personally or through an intermediary of a bribe in the form of money, securities, other property or in the form of illegal provision of services of a property nature, provision of other property rights (including cases when a bribe is given to the other individual or a legal entity at the instructions of PO) for commission of actions (omission to act) in favor of the bribe giver or the persons represented by the bribe giver, if the specified actions (omission to act) fall within the official powers of PO, or if PO, by virtue of his/her official position, is able to facilitate the specified actions (omission to act), as well as for general patronage or connivance while performing official duties.
Intermediation in Bribery		A corrupt practice in the form of direct transfer of a bribe (valuable thing) on behalf of a bribe giver or bribe taker, or other assistance to a bribe giver and/or the bribe taker in achieving or implementing an agreement between them on receiving and giving a bribe.
Intermediation in Commercial Bribery		A corrupt practice in the form of direct transfer of the item of commercial bribery (illegal remuneration) on behalf of the person transferring the item used for commercial bribery, or the person receiving the item used for commercial bribery, or other assistance provided to such persons in achieving or implementing an agreement between them on the transfer and receipt of the item used for commercial bribery.
Applicable Anticorruption Legislation		Armenian Criminal code ,the FCPA (Foreign Corrupt Practices Act, passed by the US Congress in 1977), the UK Bribery Act 2010 (passed by the United Kingdom Parliament in 2010) and similar legislation of the states where the Company conducts its business activities.
Entertainment Expenses		The Company's expenses to welcome and serve representatives of other companies (including foreign companies), which participate in negotiations in order to establish and (or) maintain mutual cooperation, and participants that arrived to meetings of the Board of Directors (Management Board) or other management body.
Employees		Physical entities, having concluded employment or service contract with the Company
Valuables (anything of value)		All (tangible or intangible) things that have value for the recipient. Valuables may mean, including, but not limited to the following: cash; transfer of shares, bonds or any other property; payment of expenses; provision of services of any type; gifts; travel vouchers); business hospitality; employment; discounts, debt release; use of the desired telephone numbers ("nice-looking numbers"); job offers and offers of internships, including those for family members; donations to certain charitable organizations; any other transfer of goods, services, tangible or intangible assets that benefits the recipient. Any valuables of any value may be deemed illegal under applicable anticorruption legislation.

3. GENERAL PROVISIONS

Corruption in any of its manifestations is inconsistent with the principles of the Company and damages its business reputation with the government, shareholders, customers, partners, competitors, Employees and society as a whole. Corruption is not only detrimental to the interests of the Company, but also affects every individual Employee. Corruption can lead to imposition of huge fines.

The Policy does not replace or supersede the legal provisions established by the Applicable Anticorruption Legislation, however, it may establish additional requirements.

If the Applicable Anticorruption Legislation establishes greater/other requirements as compared to the requirements set forth in this Policy, then greater/other requirements shall be followed.

In accordance with the requirements of the Applicable Anticorruption Legislation, the Company ensures the implementation of standards, decision-making procedures and compliance with the local regulatory acts, as well as best practices similar to those set out in the Policy in its controlled subsidiaries. The Company will use reasonable efforts to ensure that the uncontrolled subsidiaries fulfill the above requirements in order to comply with best anticorruption practices.

The Policy is **binding on**:

- all Employees,
- members of the management bodies and other bodies of the Company (Board of Directors, Committees under the Board of Directors of the Company, the General Manager) ,
- Counterparties – to the extent provided for by contracts (agreements) concluded with such persons/entities.

For the purposes hereof, all those obligated to comply with this Policy shall be hereinafter referred to as the **“Persons covered by the Policy”**.

The Persons covered by the Policy shall be familiarized with the provisions hereof on a hard copy against signature or, if technically possible, on a soft copy using an analog of a handwritten signature, in accordance with the procedure effective in the Company.

4. APPLICABLE ANTICORRUPTION LEGISLATION

The Policy is developed in accordance with the requirements of the Applicable Anticorruption Legislation, as well as the Charter, the Code of Business Conduct and Ethics and other LR.

5. KEY PRINCIPLES

The Company adheres to the principles of compliance with the Applicable Anticorruption Legislation and ethical conduct in all types of business relations and regardless of the territory in which the Company pursues its business. The Company expects all persons acting on behalf of or to the advantage of the Company to comply with Applicable Anticorruption Legislation.

5.1. Zero Tolerance to Corruption in all Forms and Manifestations

The Company openly **declares zero tolerance to corruption** in any form and requires unconditional compliance with the key Policy principles and requirements from the Persons covered by the Policy.

5.2. Tone-at-the-Top and Tone-from-the-Middle

The Company management, regardless of the level, including members of the management bodies, perform their official and/or corporate duties reasonably and in good faith being guided by the highest professional and ethical standards, legal norms and best corporate governance practices, putting the Company interests above their own.

The Board of Directors of the Company and the Company management shall set the example for the standard of high ethical behavior for the Persons covered by the Policy, as well as zero tolerance of any corruption forms and manifestations, which is an integral part of the corporate culture and daily business of the Company.

The Board of Directors of the Company and the Company management, regardless of the level, shall be aware of the contents of the Anticorruption Compliance Program, shall allocate the necessary resources for its implementation and provide general monitoring over its implementation, discipline of performance and operational efficiency.

5.3. Reputation Strengthening

The Company takes reasonable actions to prevent hiring individuals who are known to take or to have taken part in illegal activity or to be involved in activities contradicting the ethical standards established in the Company to Company executive positions or to the management bodies.

5.4.Periodic Risk Assessment and Minimization

The Company performs the activities to identify, assess and reassess corruption risks on an annual basis, based on the results of which anti-corruption procedures reasonable and proportional to the level and nature of the risks detected shall be developed and introduced.

5.5. Notification and Training

The Company continuously monitors the changes in the Applicable Anticorruption Legislation and timely notifies all stakeholders about any relevant changes and trends.

The Company implements and maintains a program for training the Persons covered by the Policy on the requirements of the Applicable Anticorruption Legislation and the Company's compliance controls through a specially elaborated training system pursuant to the annual training plan based on a risk-oriented approach.

5.6. Monitoring the Effectiveness of Controls

The Company exercises monitoring of effectiveness of implemented anticorruption controls, monitors compliance with them and, if required, improves them.

The Company takes measures to revise the relevance of compliance controls with the subsequent update of the LR containing such controls annually.

5.7.Audit and Control

The Company ensures regular conduct of internal and external audits of financial and economic activities, as well as continuously monitors the completeness and accuracy of all business transactions in accounting and compliance with Applicable Anticorruption Legislation and LR, including the key principles and requirements established by the Policy.

5.8.Responsible Officer and Responsible Unit, Reporting

The Compliance Coordinator is responsible for the introduction and improvement of the Anticorruption Compliance Program, he/she has the experience and competencies required, as well as is provided with independence, powers and resources sufficient to perform their duties.

The Compliance Coordinator, as well as the persons to whom he/she delegates the relevant powers, can participate in meetings of the collegial management bodies of the Company, if needed, as well as provide explanations on the merits of the issues considered, if needed, and communicate the opinion of the Business Ethics and Compliance Department to the members of collegial management bodies so that these bodies adopt informed resolutions at both strategic and operational levels.

The Compliance Coordinator is entitled to contact the Head of Internal Control and Audit Department MTS Armenia and the Chairman of the Board of Directors of the Company at any time and at his/her own discretion in order to initiate the submission of any issues to be reviewed by the the Board of Directors of the Company. The effectiveness of the Anticorruption Compliance Program shall be assessed by the Audit Committee of the Board of Directors and the Board of Directors from time to time.

The Compliance Coordinator monitors compliance with the requirements of the Policy and Applicable Anticorruption Legislation, performs day-to-day management of the Anticorruption Compliance Program and its continuous improvement, as well as participates in the coordination of transactions with a high corruption risk.

6. CORRUPTION RISK AREAS

6.1. Interaction with Public Officials (PO) and Public Organizations

Provision of valuables and benefits of any kind aimed at illegal influencing the decision-making process is forbidden all over the world. Relationships with PO and Public Organizations require particular caution as they are subject to Applicable Anticorruption Legislation and are defined by increased risks related to of bribery and corruption. This applies particularly to the preferences provided in favor of the PO.

It is forbidden to the Company and the Persons covered by the Policy to provide any Valuables to the PO for influencing their official decision-making process illegally in order to obtain, maintain or control business opportunities or commercial benefits of the Company. The Company may hire and (or) provide internships to the PO for a legitimate business purpose, subject to compliance with Applicable Anticorruption Legislation and the LR.



*It is **forbidden** to provide any Valuables to the PO for influencing their official decision-making process illegally in order to obtain, maintain or control business opportunities or commercial benefits of the Company.*

7.2. Gifts and Business Hospitality

Gifts and Business Hospitality can be used for building long-term partnerships between the Company and the persons with whom it interacts in the course of its business. However, Gifts and Business Hospitality can be used for illegal influence and be deemed a bribe or commercial bribery under certain conditions.

The Persons covered by the Policy shall avoid Gifts and (or) Business Hospitality features that may influence independent decision-making process in the course of the Company business, conflict with the Company interests, or create an impression of such a conflict.

Any corruption scheme using Gifts and (or) signs Business Hospitality features, as well as **extortion** of such, are **unacceptable**.



Giving and receiving Gifts is permissible subject to observing the principles specified in the relevant LR.

6.3.Sponsorship, Charity and Corporate Social Responsibility

It's forbidden to implements Sponsorship, Charity and Corporate Social Responsibility in MobiDram.

6.4. Participation in Political Activities

The Company shall **not finance** and in no other way **support or encourage** political parties or their members, including candidates for political posts, their election campaigns or political events, as well as any political organizations or movements. The Company does not allow any political contributions.

The Company does **not prohibit** the participation of Employees in political activities, unless it contradicts the Applicable Legislation and provided that the Employees do not use the Company property and name in such activities. If an Employee is applying for or was elected/appointed to the position of the Public Organization and intends to enter upon duty, this Employee shall first notify the Company in accordance with Policy [“Managing the Conflict of Interest”](#).



*The Company does **not fund or participate** in political activities*

6.5. Facilitation Payments

It is forbidden to make any payments or grant other benefits that are not provided for by applicable legislation and which are offered in order to facilitate or simplify the standard procedure (action) to which the Company has the right in accordance with the legislation, a contract or on other grounds.



*Any facilitation payments are **forbidden**.*

6.6. Payments through Intermediaries or in Favor of Third Parties

It is forbidden to make payments in favor of any third parties if it is known or there are certain reasons to believe that all or part of such payment will be used for corruption.

The Company is entitled to conduct verification procedures regarding any third parties in order to prevent and/or identify the risks of the Company's involvement in corruption activities.



*Any payments aimed at corruption are **forbidden**.*

6.7. Conflict of Interest

The Company does not allow any situations in which the Personal Interest (direct or indirect) of the Person covered by the Policy affects or may affect proper, objective and impartial performance of his/her duties (exercise of powers). The Persons covered by the Policy shall comply with the rules regarding the conflict of interest stipulated in [Policy “Managing the Conflict of Interest”](#).



Any Conflict of Interest is subject to mandatory settlement.

6.8. Transactions of Acquisition and Alienation of Participation Interest in Other Companies

The Company established special rules for compliance with the Applicable Anticorruption Legislation, including anticorruption verification procedures, for executing the transactions of mergers and acquisitions and (or) acquisition/sale of an interest in any legal entity. When assessing such a transaction, the Company examines the activities of the transaction subject and/or the partner in order to detect the risks of participation of such a company or partner in corruption actions committed by them earlier. This work includes, but is not limited to, due diligence prior to executing a transaction, as well as determination of the measures to be taken within the integration process after acquiring the asset.



*Transactions on the acquisition or sale of participation interests in other companies are subject to **mandatory anti-corruption expert examination**.*

6.9. Contractual Policy

6.9.1. Prohibition of Non-Contractual Relationships

The Company prohibits to enter on its behalf and in its interests into any non-contractual relations not provided for by the applicable legislation or LR with any types of counterparties, including any written or oral agreements, also their soft copies, not included in the main text of the contract with the Counterparty or its annexes, or in any other form, and not having passed the standard approval procedures adopted by the Company.

Any contract or agreement entered into by the Company in writing or electronically shall contain the entirety of conditions and arrangements subject to which such contract or agreement is entered into.

6.9.2. Due Diligence on Counterparties

In relations with Counterparties, the Company takes reasonable actions aimed at prevention of any manifestations of corruption, both on behalf of and to the advantage of the Company. Herewith, the Company requires that its Counterparties adhere to the Applicable Anticorruption Legislation and the LR related to it, as well as support the culture that denies any unethical conduct, both when participating in procurement procedures of the Company and subsequent conducting business with the Company. The Company developed the due diligence procedures on Counterparties and is implementing them.

6.9.3. Anticorruption Clause

The Company is entitled to initiate the inclusion of an anticorruption clause (ACC) in the contracts/agreements concluded based on the results of the due diligence on Counterparties to minimize the risk of corruption activities performed by the Counterparty.



Interaction with Counterparties shall be carried out on a contractual basis and with mandatory due diligence in accordance with the Company LR.

6.10. Marketing

The Company implements marketing activities to engage, keep and increase customer loyalty.

Any marketing activities are **forbidden if** they are aimed at:

- obtaining any unlawful business-related advantages or preferences;
- payment of remuneration to a PO, the representative of commercial organizations and/or any other person for the purposes of influencing their actions (ensuring their inaction) and/or inducing them to improperly discharge their official duties and/or for the purposes of gaining an unfair commercial advantage.



*It is **forbidden** to carry out marketing activities targeted at illegal influencing.*

6.11. Accounting Procedures

All financial operations, postings and records shall be reflected accurately, correctly and with the sufficient level of detail in the Company's accounting records, documented and available for audit.

The Company developed and implemented the procedures of internal financial control aimed at the following:

- (1) execution of financial transactions in accordance with the general or special sanction of the management;
- (2) accuracy and completeness of accounting records that enable drawing up the statements pursuant to the applicable accounting (financial) reporting standards;

(3) access to disposal of assets only in accordance with the general or special sanction of the management;

(4) regular reconciliation of accounting records of the value and composition of assets with the actual value and composition.

The Company shall appoint Employees responsible for the preparation and submission of complete and reliable accounting statements within the timeframes provided for by the applicable law.



*Failure to comply with or an attempt of failure to comply with the procedures of internal financial control, misstatement or falsification of accounting statements of the Company shall be **prohibited**.*

7. REPORTING VIOLATIONS

7.1. Those employees, members of the management bodies and other bodies of the Company who became aware of or have reason to believe that the principles or requirements of this Policy and Applicable Anticorruption Legislation are violated, shall immediately report this in any of the following ways:

- (1) to the Direct Supervisor or, if this report relates to the actions committed by the Direct Supervisor, to the superior manager (in any form);
- (2) by sending an e-mail to the Unified Hotline at: hotline@mts.ru;
- (3) to the Compliance Manager (in any form);
- (4) Via the electronic form of the Unified Hotline on the corporate portal (anonymously or on its own behalf);
- (5) by phone: +7 985 765 00 02 (+7 495 765 00 02).

The Counterparties can send a violation report to the e-mail of the Unified Hotline at: hotline@mts.ru

7.2. The Company provides an independent and comprehensive review of all reports of violations of the Policy requirements pursuant to the LR.

7.3. The Company prohibits any form of prosecution (retaliation) against the Persons covered by the Policy, who reported a violation in good faith, assisted in investigations and refused to participate in the activities contradicting the principles or requirements hereof and of the Code of Business Conduct and Ethics.

7.4. Any Person covered by the Policy who has violated its requirements may be subject to retaliation up to dismissal and (or) termination of contracts in accordance with the provisions of these contracts and applicable legislation.

8. POLICY EXECUTION

The Persons covered by the Policy, regardless of their position, are responsible for compliance with the principles and requirements of the Policy and Applicable Anticorruption Legislation, as well as for improper control of the actions of their subordinates that resulted in the Policy violations.

9. CONSULTATIONS

For consultations on the Policy application, one shall contact the compliance manager, also by e-mail at: zapetroshyan@mts.am.

Additional information about the procedures of the Company's Anticorruption Compliance Program, answers to frequently asked questions, as well as the text of the recommended Anticorruption Clause, are posted on the Single Information Portal of the Company in the section: Anticorruption Policy and Business Ethics

10. REFERENCE DOCUMENTS

10.1. External documents

Item No.	Document name	Internal portal link
	Criminal Code of the RA clauses 200, 201.1, 201.2, 201.3, 201.4, 312, 312.1, 312, 313, dated 13.06.1996	
	Foreign Corrupt Practices Act 1977 (FCPA) as passed by the US Congress in 1977.	
	The UK Bribery Act 2010 as passed by the Parliament of Great Britain in 2010.	
	US Federal Sentencing Guidelines Manual, §8B2.1., 2010	
	The Bribery Act 2010 Guidance, 2011	
	A Resource Guide to the U.S. Foreign Corrupt Practices Act, 2020	
	Evaluation of Corporate Compliance Programs, U.S. Department of Justice Criminal Division, 2020	
	OECD Anti-Bribery Convention to combat bribery of foreign officials during international commercial transactions 1997.	
	The United Nations Convention against Corruption, 2003.	
	Convention of Criminal Liability for Corruption, 1999.	
	Recommended Practice for the Development and Implementation of Actions to Prevent and Combat Corruption (Ministry of Labor and Social Security of the Russian Federation)	
	Measures to Prevent Corruption in Organizations, (Ministry of Labor and Social Security of the Russian Federation)	