

## Anti-corruption clause

1. Herewith the Parties confirm that in their activities they follow business ethics and undertake to adhere to the provisions of the Applicable Anti-Corruption Legislation and to take no actions that violate or may violate the norms of the Applicable Anti-Corruption Laws or cause such a breach by the other Party, among other things, not to request, receive, offer, authorize, promise or make illegal payments, provide services directly, via third parties or as an intermediary, including (but not limited to) commercial bribery, bribes in monetary or in any other form to any individuals or legal entities, regardless of the legal form and ownership structure, their representatives, including (but not limited to) government and local authorities, public officials, and take reasonable measures to prevent violation of the Applicable Anti-Corruption Legislation.

2. The Parties undertake not to take any actions (omissions) causing threat of a conflict of interest and to notify the other Party within a reasonable time about potential circumstances of a conflict of interest that have come to its knowledge.

3. The Parties confirm that any third parties engaged by the Parties to execute the Contract do not implement their actions to exert unlawful influence on Public Officials<sup>1</sup> or for the purpose of commercial bribery, and will be allowed to perform contractual obligations only after sufficient due diligence, including for compliance with applicable anti-corruption legislation and clause 1 hereof by the engaging Party.

4. The Parties undertake to provide full support with respect to any investigation and/or due diligence, audit that might be carried out herewith in case of any reasonable suspicions that violation of any provisions of this section of the Contract has occurred or may occur. The Parties undertake to keep and protect all confidential information that may come to their knowledge within the scope of any investigation and/or due diligence, audit, pursuant to the Russian legislation.

5. If either Party violates its obligations specified in Clauses 1-3 hereto, the other Party has the right to unilaterally suspend the performance of its obligations hereunder until the causes for such violation are eliminated or repudiate the Contract by sending a written notification of it.

6. If a Party suspects that the other Party has actually or possibly violated any provisions of this section of the Contract, as well as suspects a potential conflict of interest, such Party undertakes to immediately notify the other Party thereof.

A channel for MTS notification for sending (disclosing) the information: [external.hotline.mts@b1.ru](mailto:external.hotline.mts@b1.ru).

A channel for notification of the Counterparty for sending (disclosing) the information: contact email address as specified in the Contract.

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<sup>1</sup> Any Russian 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.