

APPROVED by
Order of Director General of
Mobile TeleSystems, JLLC
No. ____ dated _____

**Code of Business Conduct and Ethics of
Mobile TeleSystems, JLLC**

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ABOUT THE CODE

What is a Code of Business Conduct and Ethics?

The Code of Business Conduct and Ethics (hereinafter referred to as the Code) is the fundamental document of the Mobile TeleSystems, Joint Limited Liability Company (hereinafter referred to as MTS, Company), containing the key principles of doing business, as well as a set of rules and regulations adopted by our Company to comply with applicable laws, to promote fair and ethical business practices, and to prevent improprieties.

The Code establishes the rules and standards to which the employees are expected to adhere in their daily work. The Company does not apply any business practices contradicting these rules and standards. In cases demanding compliance with higher standards than those commonly accepted in commercial practice, or that fall under regulatory act of greater legal force pursuant to prevailing law, MTS will adhere to and observe them.

Why do MTS and its employees need the Code?

MTS adheres to the principles of fair practice and business ethics in order to:

- **comply with the requirements of the applicable Belarusian and foreign laws and other binding regulatory instruments,**
- **respect the interests of concerned parties,**
- **maintain a good business reputation.**

This is called *Compliance*.

The concerned parties are the customers, suppliers, competitors, the mass media, Belarusian regulatory authorities and other third parties who may exercise influence upon MTS, and whose activities, on the other hand, may be affected by MTS.

To whom do the provisions of the Code apply?

The Code applies to:

- senior management;
- other MTS employees (hereinafter, the term “employees” refers to all those to whom the Code applies).

The standards of corporate conduct and business ethics set forth in the Code are also applied to the individuals who have entered into a civil law contract with MTS, as well as to other individuals acting for or on behalf of the Company.

What am I expected to do under the Code?

The Company expects all employees to work conscientiously and with due diligence. For this purpose, the employees should:

- become familiar with the Code and strictly follow the principles and procedures set forth herein;
- fulfill their duties in accordance with the MTS rules and regulations and requirements of applicable law;

- avoid a conflict of interest (for more details, see the Conflict of Interest Management section);
- show responsibility for the decisions taken;
- inform the Company immediately about all known or potential cases of misconduct or acts of unfair business practices;
- behave ethically in all cases when an employee acts on behalf of the Company or may be associated with it.

We believe that only a conscientious business is sustainable!

Sometimes there are situations when it is not easy to determine unambiguously which decision to take in order to demonstrate honest and fair behavior. The Code is not an exhaustive set of rules applicable to every controversial situation. If you do not know what to do, ask yourself the following questions:

1. Is it legal?
2. Is it honest and fair?
3. Does it serve the Company's interests?
4. Is this consistent with the Company's rules and regulations?
5. Is it in line with the Company's reputation?
6. Am I authorized to do this?
7. Would I feel comfortable if information about my actions was published in the mass media?

If at least one answer to these questions is "No," you should not do what you intended to do.

What are the consequences for violating the Code?

The employment contracts with employees include provisions on their compliance with the Code and applicable law.

Behavior that does not comply with the law or the Code may result in disciplinary action, including dismissal/employment termination, depending on the circumstance and in accordance with the law.

The matters of the Code violation, ethical conflicts, the findings of inspections based on the employees' complaints about unethical behavior of the MTS employees (colleagues, management, subordinates) are considered in the manner prescribed by law of the Republic of Belarus and the bylaws of the Company.

The employees who violate the law or the Code shall compensate MTS for material damage caused by this violation in accordance with labor and other laws, and may also be subject to administrative and criminal prosecution in accordance with applicable law.

In addition to the above, it should be borne in mind that the actions of each of us can directly affect the Company's reputation and financial standing, and in the final analysis, affect us and our colleagues working at MTS.

What does the Company do to ensure that its employees know the provisions of the Code?

All Company employees are informed about the provision of the Code against signature when hired. In addition, to ensure the proper understanding and compliance with the requirements of the Code, all employees undergo an electronic training course and testing on compliance with its provisions within three months from the beginning of employment and then once every two years.

1. MTC AND ITS EMPLOYEES

We believe that our attitude towards our employees largely determines their honest and fair behavior at the Company.

Our key asset is people. And today we direct our efforts to the search for ingenious, innovative-minded specialists, to their continuous development within the company. The acknowledgment of our high business efficiency is based on the high professional level of our personnel.

1.1. Working conditions

The Company is developing a friendly corporate culture, an atmosphere of gratitude, care and recognition for those who help develop the business - our colleagues! The company shall comply with all applicable laws and regulations related to Labor law, ensure the social protection of its employees, and act in accordance with the principle of equal employment opportunities for all employees depending on their professional merits. This applies to all aspects of employment, including hiring, training, promotion, compensation, discipline and dismissal.

The key to professional growth and an essential condition for the honest and responsible behavior of our employees is high-quality, timely and regular training.

The MTS Group has its own Corporate University. Its mission is to create development opportunities expanding people and business borders, for MTS confident future.

The existing system of remote testing and training at the Company offers all MTS employees a variety of training courses regarding certain rules and requirements established by the Company, including those contained in this Code, in details.

MTS is fully committed to the universally recognized global approach to human rights. In its activities, the Company is guided by the following principles:

- Equal opportunities and treatment in the field of labor and employment;
- Freedom of association;
- Refraining from forced and bounded labor;
- Refraining from juvenile labor;
- Non-discrimination, including discrimination on the grounds of disability with regard to all matters relating to all forms of employment;
- Protection, support of the family, motherhood, fatherhood and childhood;
- Safe working conditions;
- The right to education.

The company prohibits discrimination and harassment, violence or threats of violence, as well as other inappropriate behavior towards any employee. MTS strictly adheres to the principle of equality and respect for all its employees regardless of their personal characteristics: race, colour, sex, ethnic, national, religious affiliation, citizenship, age, physical abilities, marital status, gender identity, culture and other personal characteristics protected by law. All employees are responsible for the adherence to these principles.

1.2. The role of corporate leaders

An important task of MTS managers is to form a culture and working climate that contribute to taking correct and reasonable decisions, which are the formula for the Company's success. A leader is not only a top manager, but any other MTS employee who has subordinates.

MTS expects every manager to:

- be an example of adherence to the Company's values, including when interacting with the customers, public authorities and suppliers; show awareness of the requirements of the applicable legislative instruments and bylaws of the Company, and share their knowledge with the subordinates;
- explain to the employees the issues of Labor law and other principles of law;
- encourage the employees not only for efficiency but also for ethical and honest behavior in relations with each other, as well as with the partners and suppliers;
- be open to the colleagues' questions and suggestions, including those of corporate ethics and decency;
- promptly react to the revealed violations of the MTS Code and other policies and procedures.

1.3. Workplace behavior

The company strives to provide safe and comfortable working conditions for its employees; however, creation and maintenance of a healthy working climate also depends on the employees' behavior.

Labor discipline is a compulsory compliance with the requirements established by the internal labor regulations, employment agreements, including job descriptions, as well as bylaws. In case of the labor discipline violation (disciplinary offense), i.e. non- performance or improper performance of the labor duties through the employee's fault, MTS may impose disciplinary sanctions.

Question: What types of behavior are categorically prohibited in the Company?

Answer: The Company prohibits any behavior posing a risk to human health in the workplace, for example:

- arriving to work in a state of alcoholic, narcotic or toxic intoxication, as well as the consumption of alcoholic beverages or narcotics;
- intentional causing of harm to the health or property of other employees;
- interfering with the work of other employees;
- smoking in prohibited areas on the MTS territory and within its premises.

All employees shall meet the labor protection and fire safety requirements under the law of the Republic of Belarus and the bylaws of the Company.

The MTS employees shall treat their colleagues with respect, provide assistance to newcomers, follow the business ethics rules and help foster a friendly environment, not use a foul language when communicating with other employees, counterparties and customers of the Company.

Every day we communicate via e-mail with our colleagues, partners, contractors and other parties concerned. It is important to pay attention to the contents of the messages sent, to adhere to a professional corporate style, to state information, if possible, in a concise, clear and unambiguous manner. Remember that careless statements in e-mails can potentially carry significant reputational, financial and legal risks for our Company.

Question: Why should I observe the correspondence rules and be careful with the contents when corresponding with a colleague?

Answer: Because under certain circumstances, the message you send could fall into the hands of someone for whom it was not intended. Besides, the messages sent from the company's e-mail system are its property and may be used to harm the Company in conflict situations as arguments, including in external instances. For example, at first glance, such harmless phrases as "assist", "motivate clients" or "thank you for swift cooperation" may be perceived ambiguously and not play in your favor.

Question: Does the Company have a dress code policy?

Answer: The MTS employees shall follow the dress code. MTS sticks to a business style in clothing; sportswear and athletic footwear are not allowed. The employees should look neat and wear clean and ironed clothes, polished shoes, keep to a neat hairstyle and personal hygiene.

On Friday, a casual dress code is allowed for most employees. However, if you meet with customers or contractors, business style is also required on this day of the week.

The employees shall use all their working time to perform their duties as efficiently as possible, strive to create and maintain good relations, increase the trust of counterparties, and strengthen the MTS business image.

The Company employees shall use telephones and other electronic communication devices, written materials and other MTS property primarily for business purposes. One-time use of telephone, facsimile, replicating equipment, personal computers, e-mail and other equipment for personal purposes, as a rule, is permitted if it is not systematic, does not entail significant additional costs for MTS, does not violate the applicable law and bylaws of the company, and does not interfere with the employee's performance of job responsibilities.

The Company employees should not enter into electronic correspondence and visit the web-sites that can be regarded as offensive, defamatory, intimidating, obscene or vulgar, as well as the web-sites not associated with the performance of their official duties, should not use the Company equipment or facilities for personal letters sent to recipients for the purpose of subsequent mailing, advertising, or personal offers.

1.4. Conflict of interest management

The Company expects all of its employees to fulfill their duties conscientiously and prohibits the derivative of personal gain from the positions thereby to the detriment of the Company's interests.

A conflict of interest is a situation in which a conflict arises or could arise between the employee's personal interest and the Company's legitimate interests.

Personal interest is the opportunity for a Company employee to derive personal gain in terms of money, valuables, other property, benefits and advantages when performing job duties.

Why is it important to protect our Company from conflict of interest?

1. To prevent possible financial losses and reputational damage to the Company.
2. To prevent the adoption of biased decisions to the detriment of the Company.
3. To prevent situations when the existence of business interests outside the Company could hinder the employees in the proper performance of their duties.

A detailed description of the terms and situations of a conflict of interest, as well as the sequence of employees' actions which must be performed to prevent a conflict of interest, are provided for in the Regulations on Conflict of Interest Management.

New employees should be familiarized with the Regulations on Conflict of Interest Management, fill out and sign a special form "Disclosure of Conflict-of-Interest Information".

To prevent conflict-of-interest situations, the managers are certified annually.

Whenever possible, all employees should avoid situations in which a conflict of interest may arise. If a conflict of interest cannot be avoided, the employees shall promptly inform their immediate supervisor, actively participate and provide assistance in resolving the conflict of interest, and immediately take measures to eliminate the conflict of interest, if required by the Company. If the issue remains unresolved at the level of the manager, the employee shall contact the compliance manager (by sending a message to compliance@mts.by). Like the employees, MTS is interested in the swiftest settlement of the conflict of interest situation with an outcome beneficial to all parties.

Question: My relative is employed with MTS, just like me, but he works in another structural unit of the Company. Is this a conflict of interest?

Answer: This situation is a potential conflict of interest. You should disclose information in accordance with the Conflict of Interest Management Regulations.

Question: The company where I or my relatives are co-founders is an MTS supplier. Is this a conflict of interest?

Answer: Yes, if your job duties involve the authority to make decisions with respect to that company.

Question: My spouse is an employee of an MTS competitor. What should I do?

Answer: In this case, you must disclose information about the conflict of interest in the form and in the manner prescribed by the Regulation on the conflict of interest management to find the optimal solution.

1.5. Gifts and entertainment

Giving and receiving gifts, as well as attending business and entertainment events is a common business practice, however, in certain situations, this practice can seriously jeopardize the Company's business.

Within the scope of its anticorruption policy, the Company has adopted a separate Regulation *On Gifts and Entertainment at Mobile TeleSystems JLLC*, which sets out the rules and regulations, spending limits, restrictions on the circumstances of giving and accepting gifts and invitations to events, as well as requirements for their approval procedure.

Gifts in cash or their equivalent (gift cards, vouchers, certificates) are prohibited at MTS.

As a rule, it is permissible to give gifts or invitations to entertainment events to some customers and counterparties, or to receive them from these parties, provided that this cannot be interpreted as an inducement or reward for a particular business decision. Moreover, all expenses for gifts and entertainment should be reflected in the expense reports.

It is unacceptable for MTS to use gift giving (as well as other types of hospitality) to gain commercial benefits, as well as in exchange for information, a favorable attitude or business opportunities.

Gifts and participating in entertainment events should in no way affect an MTS employee's ability to make unbiased and impartial business decisions.

Should a gift or invitation not meet the above standards, an MTS employee shall politely refuse. Each of us is responsible for a reasonable approach to these issues.

If you are in doubt whether it is appropriate to give a gift or invite a customer to an event, or under the Company rules you cannot accept the gift presented to you, you should contact your supervisor or the compliance manager (by sending a request to compliance@mts.by email address) to make the right decision together.

1.6. Confidential or proprietary information of the Company

When working for the Company, the employee may deal with confidential information and materials. The list of information materials considered as trade secrets and confidential information is given in the Regulations on Information Security (Non-Disclosure) Procedures of MTS. Their protection against unauthorized access is vital for the preservation of jobs for all employees.

Upon joining the Company, a new employee shall assume an ethical and legal obligation not to disclose confidential or commercial secret information, even if this employee decides to leave the Company in the future.

All MTS employees shall comply with the MTS information security (non-disclosure) procedures, namely:

- ensure the safety of confidential information held by the employee;
- transfer confidential information to other employees in accordance with the rules established by the Company;
- not transfer confidential information to third parties, not make it publicly available;
- comply with the requirements of the MTS bylaws to provide the information protection;
- should any unauthorized persons attempt to obtain protected data or any facts of disclosures of confidential data to be revealed, immediately inform the MTS Security Department about this;
- keep confidential official secrets of public authorities, which became known in connection with civil law relations, and as well as confidential information of companies with which MTS has business (partner) relations;
- after the termination of civil law relations with MTS, hand over all media containing confidential information, that is, scripts, rough copies, documents, etc., which were in the employee's possession in connection with the performance of contractual obligations to MTS, with a certificate issued to the employee responsible for confidential records management and in the absence of this employee, to the head of the corporate business unit;
- immediately inform the MTS Security Department about the loss or shortage of media containing confidential information, certificates, badges, personal seals, keys to the data rooms, storages, safes (metal cabinets) and any other facts that may result in the disclosure or leak of protected data.

Other MTS employees, including your colleagues, should not have access to your office computer, laptop, or mobile device. It is recommended that you should always lock your computer when you leave your workplace.

Be very careful with the documents containing confidential information; do not leave them at your workplace. Use a paper shredding machine to destroy discarded documents containing confidential information.

Question: Being on a business trip, a colleague of mine asked me to send to his personal e-mail some presentations for work. Can I send them from my work address? After all, this is necessary for work.

Answer: You shouldn't do it. The presentation might contain confidential information about the Company; therefore there is always the risk that such material, sent to external servers, could fall into third party hands. This action could become the grounds for a disciplinary sanction against you and your colleague. The Company has provided for the possibility of remote access to your work e-mail.

Each employee is personally responsible for complying with the MTS information security (non-disclosure) procedures.

1.7. Protection and proper use of the Company property

The employees should be careful with the Company property, which, in addition to tangible things (movable and immovable property, securities, money, etc.), includes the results of the intellectual work of the Company employees (commercial products, programs, documents,

trademarks, etc.), as well as property rights and liabilities. In this regard, the MTS property includes all correspondence and data transmitted and received via electronic and telephone communication systems of the company or contained in these systems and all written correspondence. To the extent permitted by law, the company, in order to ensure information security, is entitled to monitor all correspondence, electronic and telephone communications, give consent to its disclosure and processing to third parties, including law enforcement agencies. It is important to pay attention to the contents of the message, adhere to a professional style, state the facts briefly, clearly and not ambiguously. The employees shall ensure the efficient use of the Company assets property for business purposes and not use the funds or property for any illegal or unseemly purpose. Theft, negligence, recklessness and waste can have a direct impact on the Company profitability.

To ensure the protection and proper use of MTS property, every employee shall:

- exercise proper caution to prevent theft, damage or misuse of the MTS property;
- immediately report to the immediate supervisor and employees of the MTS Security Department about the actual or suspected theft, damage, negligent or malicious use of the MTS property;
- use telephones and other electronic communication devices, written materials and other MTS property only for business purposes;
- protect all electronic programs, data, communications, and written materials from accidental third-party access;
- use the MTS property only for legitimate business purposes stipulated by official duties.

2. MTS AND ITS CUSTOMERS

We at MTS believe that life is a canvas of possibilities for all, and from the very birth every person has the potential to translate these possibilities into action for their benefit and the world around them. We believe that every individual is a potential hero who can accept the challenges and cope with any situation.

Potential heroes are people who inspire MTS and for whom we create our products. Using the possibilities provided by our products, technologies or services, individuals overcome obstacles on the way to the goal and unlock their potential.

2.1. Customer requests

Every Company employee knows that MTS works for its customers.

All employees interacting with customers undergo special training to keep abreast of the products offered by the Company, to find the necessary information and competently convey it to the customers.

To cater for its customers' needs, MTS strives:

- to create the most convenient servicing conditions. We are constantly looking for new and improving the existing servicing systems;
- to develop self-service systems and encourage their use;
- to support the customers via "live contact". All subscribers who turn to MTS stores or Contact Centres are sure to receive reliable, complete and transparent information.

Not a single customer appeal left unaddressed.

In the changing environment, we instill confidence in everybody and help people to unlock their potential and move towards new possibilities. MTS is a source of possibilities.

Every employee should take an interest in the MTS products. Moreover, the employees should be aware of the sources of information that are available at any time, such as the My MTS mobile app, online support at help.mts.by and other self-service systems. You can and should recommend them to your friends and acquaintances. This is sure to create a favorable impression of you as an employee and of the Company in general.

When responding to a customer request, you should always be sure that the customer has been offered all possible solution options and is satisfied with the service provided.

2.2. Good faith marketing

MTS strives to build long-term relationships with its customers, provide high-quality services at the best prices, taking into account the interests of society and business, various social and age groups, the scale and economic development of every region where the Company operates.

We develop and offer “smart tariffs” with a personal approach: each subscriber can choose the services in the amount needed, adjust the package of calls, SMS and the Internet as desired and needed.

We have created MTS-TV that allows our customers to connect to and enjoy their favorite channels and movies at home and while traveling (the MTS Cinema, MTS TV application, for a smartphone and tablet).

Even today, our customers have access to the products that make it possible for them to use innovative technologies in different spheres of life, such as entertainment, education, and sports.

The complete list of rates and services is available on the corporate website www.mts.by.

<p>We do our best to ensure that our customers receive high-quality and secure services not only within the MTS network, but also when in roaming.</p>

MTS always informs its customers outside the home network, through SMS messages, they have the opportunity to:

- top up their balance with a bank card when in roaming;
- minimize their expenses by activating the options both for services necessary to the subscribers (voice, SMS, Internet), and as a single set and their cost;

We are concerned that our subscribers can obtain the necessary assistance in any place and at any time. We provide our customers in the international roaming with a free opportunity to contact the MTS Contact Centre and receive MTS consultation by calling **+375 29 7770890**. Besides, MTS subscribers can use the My MTS app and MTS sites for free to receive information about MTS services, their activation/deactivation, and topping up. At the same time, the subscriber shall pay for downloading and updating of the My MTS application, transfer to third-party Internet resources from the application or the official website according to the applicable rates.

We do not send spam to our customers and do not allow anyone else to do it.

MTS sends informative ads only to the customers who have consented, and takes care to ensure the volume and frequency of these messages to be in strict line with the MTS contact policy in place.

MTS does not conduct business with content service providers who send messages containing deliberately false information to MTS customers.

MTS strives to use fair and ethical methods of promoting its own services. MTS takes care to ensure that any information about its products and services is true, complete and accurate and does not misrepresent the true product features and is communicated to the customer in an accessible and understandable manner.

MTS does not use any methods of advertising its products and services, which can be perceived as unethical or do harm to competitors or consumers.

We track the quality and cost of content.

MTS ensures the quality and billing accuracy of content services, whether branded (offered under the MTS brand) or furnished in the form of content provider services.

MTS does not pursue the commercial launch of content services that have not been subjected to proper quality and billing-accuracy testing (services not accompanied by the requisite positive conclusion by the MTS subdivision responsible for testing).

We leave no customer complaint unaddressed.

Every complaint from an MTS customer (whether submitted verbally or in writing) must be reviewed within the established timeframe and followed up with a substantiated decision.

MTS regularly analyzes incoming customer complaints for the purposes of identifying the real causes of their origination, and develops and implements appropriate corrective measures aimed at eliminating these causes to prevent (minimize the possibility) of their repeated occurrence.

If a friend contacts the employee with a complaint, this signal should not be ignored under any circumstances. The friend should be invited to turn to help.mts.by or to contact the MTS Contact Centre (24/7) by calling 0890 (within the MTS network) or (+375 17) 237-98-98 (from any network).

Question: I was charged 15 rubles yesterday. I do not understand why. To whom at MTS can I send a complaint to get my money back?

Answer: Do you have the My MTS app installed on your smartphone? If not, then the first thing I suggest is install it. There you can not only check the expenses, but also manage the services and rates. Secondly, let's look at the latest withdrawal, maybe it was payment for the service or subscription fee. Should you have further questions, then using the My MTS app, you can turn to the online support. The MTS employees will help you to look into the unanswered issues.

2.3. Combatting fraud on communication networks

Fraud on communication networks includes the intentional activity of individuals in communication networks, including fraudulent activity aimed at the unlawful receipt of services and/or unauthorized use of customer and/or communications-operator resources without their proper payment, the unlawful accessing of official customer and/or operator information, including for the purposes of deriving financial gain, as well as other actions aimed at causing damage or other harm to the customer and/or the operator. This activity, in particular, includes SIM-card cloning, equipment tampering and the generation of international PRS traffic, unauthorized access to subscriber profile pages for the purposes of the siphoning of funds, and unauthorized termination of international traffic, etc.

The company takes measures to combat fraud on communications networks.

Fraud associated with SMS services, fraudulent content providers is one of the most common types of fraud in communication networks, the financial losses from which are incurred by subscribers. MTS actively combats these types of fraud. A system has been launched to identify and filter fraudulent SMS messages and SMS spam sent to MTS subscribers from the networks of other communications operators, including from foreign carriers. We conduct a regular analysis of subscriber complaints against the actions of content providers. Should the actions of a content provider be deemed unfair, it is subject to fine sanctions.

Fraud involving the use of communications networks gateways. The Company exercises constant control for the purpose of identifying illegally installed gateways in the MTS network.

Fraud involving the use of data transmission services. The Company has established control over elevated use of data transmission services, including by subscribers in international and national roaming.

Fraud in roaming. There is control over elevated use of voice and data transmission services when roaming internationally and nationally, as well as control over subscriber connection to the International and National Roaming and International Access services.

For the purposes of improving subscribers' awareness of combatting fraud, the Combatting Fraud section was created on the website safety.mts.by to furnish information about how to protect from fraud and about security services offered by the Company.

Question: What should the Company employees do if they become aware of an instance of fraud on the communications network or are contacted by a subscriber with a fraud complaint?

Answer: If a Company employee has information concerning instance of fraud against subscribers or the Company, the employee must send it to rad_project@mts.by or contact the Head of Revenue Assurance and Recovery Department.

Subscribers may be directed to the information posted on the website safety.mts.by.

2.4. Personal data protection

As a leading telecom operator, MTS pays great attention to the data privacy because the confidentiality of subscribers' personal data has the same priority as the uninterrupted provision of communications services.

The main principles of personal data management are as follows:

- Personal data must be processed exclusively for the purposes of fulfillment of the employee's official duties;
- The grounds for the personal data processing are the contract to which the subscriber is a contracted party, the employment agreement with the employee, as well as the subscriber's consent to their personal data processing;
- The transfer of personal data to third parties should be carried out with the mandatory observance of the laws of the Republic of Belarus and ensure the confidentiality and protections of these data against the unauthorized access through the use of data security facilities;
- Processing of special categories of personal data is prohibited at MTS, except as otherwise provided by law of the Republic of Belarus.

Question: What is personal data?

Answer: Personal data are any information related to a specific individual (subscriber, employee, visitor, etc.).

Question: When are personal data subject to protection?

Answer: Personal data are subject to protection during collection (including audio recording, photo and video shooting), processing (including systematization, storage, modification, use, depersonalization, blocking, and deletion), and dissemination to an indefinite number of persons, provision of personal data to third parties with or without the use of automatic means.

MTS strives to make its subscribers sure of the Company reliability and guarantees the confidentiality of their personal data. The information security (confidentiality) policy outlines the principles, procedure, terms and conditions governing the processing of the personal data not only of MTS subscribers, but also its employees and other individuals whose personal data are processed by the Company, as well as by third parties at the instruction of MTS.

3. MTS AND SOCIETY

Our development strategy has been developed and is currently being implemented in accordance with public and consumer demand. MTS is a leader in telecommunications, providing innovative services and solutions for daily life and the business tasks of every person. As one of the most significant companies that has written itself into the country's history, MTS makes an important contribution to the development of the regions of presence and improvement of the life quality of millions of people.

Today, the public expects companies to conduct socially responsible business, and MTS shares and develops this approach.

3.1. Interaction with partners and suppliers

MTS strives for truly partnership interrelationships with its counterparties. We expect our partners and suppliers to adhere to high standards of conducting business and use an effective, legal, honest and conscientious approach in their activity because our customers expect the same behavior from us.

To improve interaction with suppliers, MTS evaluates and classifies its suppliers, which allows developing interaction strategies, as well as making decisions on the development of further relations.

MTS expects the following from its partners and suppliers:

- cooperation in the implementation of the MTS mission;
- conscientiousness and honesty in business;
- desire to find a mutually beneficial solution;
- protection of confidential information;
- commitment to responsible business conduct, concern for the environment, ensuring fair working conditions, transparency and accountability, and respect for human rights.

MTS employees must not receive property dishonestly through manipulations, intentional concealment of known facts, improper use of confidential information, use of corrupt schemes, leading astray regarding facts of significant importance, or any other practice that does not meet the MTS values and approach towards business practices.

MTS expects the following from its employees with regard to partners and suppliers:

- following the established procurement procedures of the Company;
- interacting with conscientious partners and suppliers, whose work methods must not compromise the MTS reputation;
- reflecting of principles of the Code and applicable MTS policies in the contracts and agreements;
- encouraging partners and suppliers to apply our standards;
- honest and fair attitude towards the partners and suppliers.

The MTS employee as well as its partners and suppliers can always report their suspicion of non-compliance with the Company bylaws and the law of the Republic of Belarus or other concerns regarding finance, accounting, auditing, corruption or fraud at the Company, or other serious situations affecting the interests of MTS or its employees. Appeals from MTS employees are sent to the Company's Hot Line at: hotline@mts.by. The MTS partners and suppliers can send their appeals to control_audit@mts.by.

3.2. Intellectual Property Protection

MTS recognizes that intellectual property is one of the most valuable assets of the Company. Unauthorized use of intellectual property could result in its loss or reduction in its value, as well as entail criminal and civil-legal liability for the violators.

We protect our intellectual property and respect the intellectual property of other market participants.

No one is entitled to use the MTS intellectual property without the prior permission of MTS.

The company does not use the intellectual property of third parties without their permission. In particular, MTS does not use, copy or transmit third-party's materials protected by copyright, such as music, videos, programs, etc., without a license or permission from the copyright holder.

Every MTS employee and third parties shall comply with copyright and laws and regulations in the field of intellectual property.

3.3. Public speaking, statements and relationships with the media and social networks

The Public Relations Group is the only division of the Company authorized to make official statements, issue press releases and make comments to the mass media.

If the employee was contacted by a media representative with questions directly or indirectly affecting MTS, these questions should be redirected to the MTS Public Relations Group.

Messages from social media users regarding MTS should be redirected to press@mts.by and reported to the head of the Public Relations Group or to the MTS press secretary.

3.4. Corporate Social Responsibility

Corporate social responsibility (CSR) is the responsibility of the company for the impacts its decisions and operations have 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 consider this to be the guarantee of the Company's sustainable development.

MTS strives to integrate CSR in all aspects of its operations, encompassing, among other things, social, economic and environmental fields and answers the requests of society, consumers, shareholders, its employees, the state, non-profit and public organizations, partners and suppliers, and local communities.

The CSR activities of MTS are based on the principles of conducting a socially responsible business at ensuring sustainable development and growth of the Company's welfare, forming a competitive economy, improving the quality of life and flourishing of society. To comply with the CSR principles, the Company provides such business conduct that:

- contributes to sustainable development, health and well-being of society;
- takes into account the expectations of concerned parties;
- integrated into the activities of the Company and put into practice;
- complies with the law and is consistent with international standards of conduct;
- contributes to increasing the transparency of the Company and improving the management system.

The key areas of CSR of the Company are support for innovative activity of talented youth, educational projects on the useful and safe use of the Internet for children and elderly people, development of corporate volunteering, environmental projects and philanthropic projects to help seriously ill children.

“Children on the Internet” is one of MTS major CSR projects. This is a project, which is a set of educational activities that combines an interactive portal and a series of training lessons and activities for schoolchildren throughout Belarus. The main goal is to inform children, parents and teachers about the potential risks of using the Internet, ways to protect against network threats and the useful capabilities of the global network for education, development, communication and leisure.

"The network all ages yield surrender" is a training project on using the Internet for elderly people. A social educational program to teach elderly people to use the Internet and increase the level of their social adaptation in the information society.

Being an MTS representative, each employee shall comply with the minimum standards of socially responsible behavior in relation to users of the information space.

All employees are directly or indirectly responsible for the young subscribers and shall not contribute to the placement and further dissemination of malicious and illegal content. This information includes unethical materials that are contrary to moral and social norms accepted in society: images of a sexual nature widespread on the network, pornography, aggressive online games, gambling, promotion of an unhealthy lifestyle (drug, alcohol, and tobacco consumption, intentional development of anorexia, bulimia), images of violence, harm to health and life threatening, various methods of suicide, foul language, insults and other similar information.

The MTS employees shall not use and promote the use and further dissemination of pirated contents on the network.

The company carries out activities to support children from child care facilities, World War II veterans, children with disabilities and from low-income families.

Question: Can employees initiate their own social project?

Answer: Any employee of the Company can take part and support any socially-oriented activities if they do not violate the laws in force and generally accepted ethical standards.

As a volunteer representing the Company, an employee may only act within the scope of the corporate policy on CSR.

3.5. Philanthropy

Our Company adheres to the concept of philanthropy adopted in the MTS Group of companies. We tell our partners that the factor of social responsibility is one of the most important in building the reputation of the Company. The principles of philanthropy are based on transparency, openness and security.

Question: How is transparency of charitable payments ensured in MTS?

Answer: All sponsorship assistance is provided in strict accordance with Decree of the President of the Republic of Belarus No. 300 dated 01/07/2005 *On Provision and Use of Gratuitous (Sponsorship) Assistance*. MTS provides only targeted assistance, funds are transferred only for the purposes prescribed by law, and recipients provide MTS with the established reporting.

Traditionally, MTS pays special attention to sick children and national sports support.

3.6. Ecology

Within the scope of environmental events, MTS evaluates the environmental impact at all stages of its activities: from construction of base stations to the production and packing of SIM-cards. We work for the MTS team in general and each employee in particular are involved to the utmost in the process of implementing environmental projects and have an objective assessment of their responsibility to nature.

We try to put the world around us into perspective, and are concerned about environmental preservation. The initiatives launched at MTS are aimed at caring for the environment and its resources. The Company organizes and takes part in ambitious municipal environmental projects and promotes an eco-friendly culture and environmental protection activities. MTS actively encourages employees to participate in the Company's eco-initiatives.

As a member of the UN Global Compact initiative, MTS is implementing a program of support for environmental initiatives in Belarus: Earth Hour, Car Free Day, etc.

Question: What contribution can every employee make to protect the environment?

Answer: MTS has launched a project involving the collection of used batteries for recycling. Anyone can drop them off at the MTS administrative offices. The company also holds a republican campaign to collect plastic caps. The funds from recycling them are sent to aid sick children. Each employee can take part in environmental campaigns and projects.

4. MTS AND LAW

MTS activities are governed by a number of laws and various regulatory requirements. It is very important for the employee to know the rules and requirements applicable to their area of responsibility.

The Company's success and its reputation depend on strict observance of national and international laws by each employee, as well as the timely and correct response to the regulatory requirements.

MTS attributes great importance to the development and introduction of a system of measures to prevent violations of applicable law.

4.1. Government relations

During its operation, MTS interacts with government agencies of the Republic of Belarus, as well as international organizations. This interaction must occur exclusively in compliance with prevailing law and internal Company requirements, regardless whether MTS provides services to this government agency or not.

Legislation tightly regulates the procedure for the provision of services to government agencies. When participating in tenders held by government agencies, MTS employees shall be exceedingly cautious and strictly adhered to the requirements of all MTS bylaws, including the requirements of the Anticorruption Legislation and Competition and Antitrust Legislation sections of this code.

A similar interaction procedure should be followed in cases where the government agency is issuing any sort of permit, license or approval.

The Company has always strived to cooperate with government agencies in the performance of their official functions, including the holding of scheduled audits and investigations. It should be borne in mind that the information given at the request of the government agency must be relevant, accurate and complete.

Any employee who has received any request from a public authority or administration as part of an audit or investigation shall immediately contact the appropriate unit of the Company.

MTS position regarding government agencies must be clear and true to avoid financial and reputational risks of damage to the Company.

Question: I got a call from my former classmate, who now works in the tax authority. He asked me to give him information about a certain MTS transaction. He said that the tax authority has the right to request this information. What should I do?

Answer: You should explain to your former classmate that to receive information about a certain MTS transaction, an official letter should be sent to the company requesting relevant information on the transaction.

4.2. Anti-corruption legislation

MTS adheres to the principles of compliance with anti-corruption laws in all types of business relations.

Corruption is not part of our business!

According to the norms of anti-corruption laws applicable to the Company, MTS employees and persons acting on behalf of or in the interests of MTS are prohibited, whether directly or through an intermediary, from rendering, offering, promising or approving payments in the form of monetary funds or any other valuables, as well as from proffering any financial or other gain or advantage to any third parties with the intention, by virtue of the official position occupied thereby, of exerting influence on their actions (or ensuring their inaction) or inducing or rewarding their improper performance of the official or otherwise legally-envisioned duties.

Furthermore, all Company employees are prohibited, whether directly or through an intermediary, from demanding, approving the acceptance, or accepting any financial or other benefit or advantage, including payments in the form of monetary funds or any valuables.

Applicable anti-corruption laws refer to the anti-corruption laws of the Republic of Belarus, the US Foreign Corrupt Practices Act, and the UK Bribery Act.

The Company adopted the Regulation on compliance with anti-corruption laws, which is binding on all members of the management bodies and employees of the Company, as well as all third parties acting on behalf of and / or in the interests of MTS.

To prevent corruption, MTS has developed and implemented an anti-corruption compliance system. The system establishes measures aimed at managing regulatory risks, preventing and protecting the Company from any manifestations of corruption, both within the Company and attempts to engage the Company in corruption activities from outside, improving the corporate culture of the Company, introducing and developing the best corporate governance practices in

the Company, as well as standards of responsible business conduct. The corporate system of anti-corruption compliance is constantly developing and improving, based on the norms of applicable law, recommendations of regulatory authorities, industry specifics and best practices in this area.

Question: Why are the US and UK anti-corruption laws applied to the MTS operation?

Answer: Mobile TeleSystems, JLLC is a joint-stock company of MTS, PJSC Company, and therefore MTS, PJSC is responsible for the operation of Mobile TeleSystems, JLLC to comply with the requirements of the anti-corruption laws applicable to MTS, PJSC.

MTS, PJSC is public company whose securities have been traded on the New York Stock Exchange since 2000. Registration on the US Exchange entails that foreign companies assume the obligation to comply with a number of requirements provided for by the local legislation. Thus, aside from requirements mandating the existence of an internal control system, ensuring the reliability of financial reporting and others, MTS operations are governed by the requirements of the US Foreign Corrupt Practices Act (FCPA), which prohibits US companies and foreign companies whose securities are traded on the American stock exchange from engaging in any corrupt activity whatsoever with respect to public officials abroad.

Similarly, the requirements of the UK anti-corruption laws are applied to MTS, PJSC and its main shareholder. MTS PJSC is a subsidiary of a company whose securities have been placed on the London Stock Exchange, which, in conjunction with a host of other factors, may serve as grounds for the application to its operations and the operations of MTS of the requirements of the UK Bribery Act.

4.3. Combating Legalisation (Laundering) of Illegally Gained Income and Financing of Terrorism

When constructing business processes, the Company adheres to principles that, among other things, contribute to the prevention and identification of financial transactions related to the legalization of proceeds from crime and the financing of terrorist activities.

MTS carries out mandatory identification of its subscribers and other actions provided for by law to assist state bodies in identifying individuals and organizations with respect to which there are sufficient grounds to suspect their involvement in terrorist activities (including financing of terrorism).

4.4. Prohibited content

In accordance with the requirements of the current legislation, MTS restricts access of its subscribers to information resources on the Internet that contain information messages or materials that are prohibited or restricted for circulation in accordance with the applicable law of the Republic of Belarus. The list of these resources is compiled by the BelGIE on the basis of decisions taken by the Ministry of Information of the Republic of Belarus.

If an MTS employee comes across a website whose content, in the employee's opinion, includes banned information, they independently inform the regulator through the website <http://www.mininform.gov.by>.

4.5. Competition and antitrust laws

The company complies with the antitrust laws of the Republic of Belarus and adheres to the principles of fair competition in all types of business relations.

Question: At an industry conference, my colleagues from two competing companies started talking about market difficulties and suggested coordinating the rate policy in order to support sector profitability. What should I do in this situation?

Answer: You should immediately stop this conversation and, as soon as possible, inform the Finance and Investment Department about this incident.

MTS does not use its market position to prevent, restrict competition or violate somebody's legal interests, and always strives to treat its customers and contractors, including prospective, in a fair and equal manner in all aspects of its business.

MTS does not enter into agreements with competitors that result or may lead to the prevention, restriction or elimination of competition.

In their activities, MTS and its employees will never enter into any negotiations or agreements with competitors, formal or not, aimed at setting prices for services or goods, dividing markets and similar actions. Therefore, MTS employees should always avoid exchanging confidential information with competitors, which, in the first place, includes the Company's marketing plans and strategies, as well as specific tariff policy plans.

MTS does not use unfair competition methods, respects competitors on any markets and seeks fair and legitimate rivalry.

Question: I am preparing a presentation to solicit a large corporate client. To convince the client to change their operator, I want to include information that MTS services are better. Is this permissible?

Answer: Mentioning MTS advantages in comparison to those of competitors must be true and proven. You can furnish this information if clear comparison criteria and a source of information are provided.

In addition to agreements with competitors, competition law can also regulate relationships with suppliers and customers. MTS always strives for a fair and equitable relationship with all of its counterparties in all aspects of its business.

Violation of the provisions of the antitrust law may result in fines and other civil, administrative and criminal sanctions, up to and including imprisonment.

4.6. Use of undisclosed information

The use of undisclosed information constituting a commercial secret of the Company or other protected secret is legally restricted. MTS is the owner of its trade secrets, as well as other undisclosed information.

MTS commercial secrets are information of any nature (technical, industrial, organizational, commercial, financial, etc.), in respect of which a non-disclosure mode has been established.

For example, it could be:

- financial indicators;
- information on obtaining an important license;
- information on planned dividends;
- information on major litigation;
- information on the structure and composition of network equipment;
- information about marketing campaigns prior to their public announcement.

MTS employees who have undisclosed information about MTS or other Companies obtained as a result of the performance of their duties shall not transfer, use for personal purposes or otherwise disclose this information.

Question: My cousin is going to move to Minsk. Can I tell him about our Company's intention to start providing Ethernet technology services in a certain area of Minsk?

Answer: Only if MTS has already furnished this information about construction plans in the specified area to the media or on the website.

To assist MTS employees, the Company has developed and approved the Regulations on the information security (privacy) mode.

4.7. Business transparency and reliable disclosure of information in financial statements

MTS is a public company, which submits to the relevant regulatory authorities reports on the financial results of its activities, and discloses a significant amount of non-financial information. The disclosed information is intended for both external and internal users for the purposes of obtaining an objective view of the results of the company's financial-economic activities, its plans and areas for further development.

The generated information should meet the general needs of most interested users, such as investors, employees, creditors, suppliers and contractors, buyers and customers, authorities and the general public.

Information disclosure is undertaken in such a way so as to ensure a reasonable balance between the informational transparency and protection of the Company's commercial interests. To ensure compliance with the requirements of applicable law the violation of which could result in considerable financial losses and even the criminal prosecution of the company as a whole and of individual company employees, every employee must play their role in the information disclosure system. The public disclosure of information is only permitted by individuals duly authorized by the company management to do so, as secured in the Company's bylaws.

Question: A friend of mine asked me to give him information concerning the activities of the Company. Can I provide him with this information?

Answer: If the requested information is not confidential, it must be posted in the public domain in the media, on the MTS official website, etc. - you can send the link to your friend.

The MTS employees responsible for maintaining accounts and providing data for reporting shall ensure that all business transactions are reflected in the financial statements and explanations fully, precisely, promptly and in a format that is easily understood by the user.

The MTS employees shall inform their supervisor and to hotline@mts.by, as well as report in the manner prescribed by the Code, about any and all known instances of the non-disclosure of assets or liabilities and/or the indication of false or falsified information in order to avoid the onset of legal, financial or other repercussions for MTS and the causing of serious harm to the Company's business reputation.

Question: I heard from my colleague who works at a major company, which is an MTS supplier, that they are having production problems and will not be able to meet their obligations to supply the equipment needed for the planned expansion of the MTS network. Do I have to disclose this information publicly?

Answer: No. You must immediately pass this information to your supervisors so that they can assess the relevance and the need for its disclosure. In the event of an affirmative conclusion, the information will be disclosed by a duly authorized MTS employee in accordance with the established procedures.

4.8. The Company accounts and records

Accounting documents reflect fully and precisely the business transactions conducted by the Company, and serve as the basis for the compilation of various types of reports and information disclosures in accordance with the requirements of prevailing law and based on generally accepted practice.

Accounting records are the source of data supporting the adoption of important managerial decisions concerning further Company development.

Question: What do accounting documents include?

Answer: Accounting documents include financial and management statements, the operating chart of accounts, accounting policies, bookkeeping ledgers, primary accounting documents confirming the conclusion of business transactions, sales invoices, documents on the auditing of financial and economic activity, payroll accounts and much more.

The Company approved policies governing the management of accounting documents and requirements concerning their compilation, submission, storage, archiving and destruction.

5. APPEALS AND REPORTS ON VIOLATIONS OF THE CODE

If the employee does not know what to do, or they think that their actions could lead to a violation of the Code, they shall discuss the situation with the immediate or superior manager or with the compliance manager. You can also contact the Security Office or HR Office.

If a Company employee witnesses or learns of a violation of the Code, legislation or the Company bylaws by other employees or third parties acting on behalf of in the MTS interests, they shall report so as to assist MTS in dealing with the problems that could arise.

Any employee wishing to report a violation should send a message to the hotline hotline@mts.by or to the compliance manager to compliance@mts.by. The MTS employee can also contact their immediate supervisor or any senior manager personally.

Please note that the priority method for reporting violations is a message sent to the Hotline hotline@mts.by. This is especially important to consider when identifying violations of human rights at the workplace.

For the issues concerning violations or suspected violations in the following areas:

- accounting, tax accounting and reporting;
- internal control and audit;
- asset management and property usage;
- financial operations, procurement and logistics, sales and client services, contractual relations, third-party payments and other processes essential to business and operating activities;
- compliance with commercial secret policies;
- compliance with the requirements of applicable law;
- compliance with the Code of Conduct and Business Ethics;

immediately contact one of the following persons-in-charge:

- Compliance Manager: compliance@mts.by;
- Human Resources Department;
- Security Office;
- Control and auditing group;
- Hotline hotline@mts.by.

MTS will review all credible information concerning the Code violations. All messages concerning known or possible Code violations will be considered thoroughly and confidentially, and the individuals providing the information may do it anonymously.

MTS strictly prohibits the application of any repressive measures against any employee making an effort in good faith to secure assistance and report known or possible violations.

CONCLUSION

The basic principles of MTS business conduct reflected in the Code comply with the highest standards of business ethics. It must be borne in mind that each of us, regardless of the position or functionality performed, is personally responsible for complying with the Code, and thus contribute to the overall success and strengthening of the leadership position of MTS.

The responsible and conscientious conduct of the employees maintains the MTS status as a company operating in accordance with the highest standards of ethical business practices and the best international practices.

MTS reserves the right to make amendments and additions to the Code at any time, without prior notice.

The Code is a public document. It is available on the MTS official website: www.mts.by.