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ANTICORRUPTION POLICY

**(t2 Group's Policy
on Counteraction of Corporate Fraud and Involvement in Corrupt
Practices)**

Moscow

2020

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GENERAL PROVISIONS

PURPOSE

This Anticorruption Policy (hereinafter referred to as the Policy) is a t2 Group's fundamental in-house regulation dealing with counteraction of corporate fraud and involvement in corrupt practices, sets a complex of interrelated principles, procedures, and specific measures aimed at ensuring compliance with the anticorruption and other applicable laws of the Russian Federation and other countries (hereinafter referred to as the "anticorruption laws") by t2 Group's personnel and other persons authorized to act on behalf of t2 Group.

This Policy makes part of the compliance risk management system, provides a managerial and organizational framework for preventing and counteracting corporate fraud and corruption as well as minimizing and/or liquidating consequences of corruption offences.

The policy reflects adherence of t2 Group's Management and the Company's personnel to high ethical standards and principles of the transparent and fair running of business, as well as aspiration for t2 Group's corporate culture improvement and business reputation maintenance at a high level.

The Company expects its personnel, whatever positions they hold at t2 Group, to accept and strictly comply with the principles, approaches, and requirements described in this Policy.

This Policy constitutes a framework for developing the system of in-house anticorruption regulations and administrative documents. Any and all other in-house documents of the Company are developed by taking into account the requirements of this Policy.

SCOPE OF APPLICATION

This Policy extends to all the personnel of the legal entities listed below regardless of the positions they hold, their status and functions:

- "T2 Mobile" Limited Liability Company (abbreviated name: LLC "T2 Mobile"), its separate subdivisions (branches, representatives offices, and other separate subdivisions);
- legal entities, with respect to which LLC "T2 Mobile" acts as the sole executive body (hereinafter referred to as the "Controlled Legal Entities"), including any and all separate subdivisions (branches, representative offices, and other separate subdivisions) of the aforesaid legal entities. LLC "T2 Mobile" and the Controlled Legal Entities may hereinafter be collectively referred to as t2 Group and individually as a t2 Group Company.

All of the aforementioned legal entities are hereinafter collectively referred to as t2 Group or t2 Group Companies (abbreviated name: t2 Group or the Company) and each of the aforesaid legal entities are individually referred to as a t2 Group Company or a t2 Company.

The general principles and prohibitions stated in the Policy extend to business partners and other persons by virtue of obligations between them and t2 Group or a t2 Group Company, including anticorruption obligations and agreements.

1. COMPANY'S PURPOSES AND OBJECTIVES IN COUNTERACTING CORPORATE FRAUD AND INVOLVEMENT IN CORRUPT PRACTICES

1.1. COMPANY'S PURPOSES IN COUNTERACTING CORPORATE FRAUD AND INVOLVEMENT IN CORRUPT PRACTICES

- protecting the Company's lawful interests, preventing any economic and reputation damage to the Company, improving the integrity of its assets;
- making sure the t2 Group's activities are compliant with the requirements of anticorruption laws, international anticorruption standards;
- confirming t2 Group's adherence to the principle of zero tolerance of corporate fraud and corruption in any forms, making sure t2 Group's personnel, regardless of their positions, business partners, and other persons have a common understanding of this principle;
- ensuring the Company's stable development, forming a culture of integrity and zero tolerance of abuse among its personnel and business partners;
- improving the Company's reputation among investors, shareholders, personnel, business partners, customers, state authorities, and other interested parties, forming an image of the Company as an honest organization tolerating no abuse, including corporate fraud and corruption.

1.2. COMPANY'S OBJECTIVES IN COUNTERACTING CORPORATE FRAUD AND INVOLVEMENT IN CORRUPT PRACTICES:

- setting and implementing a system of counteraction of corporate fraud and corrupt practices (an anticorruption system);
- creating and implementing an efficient mechanism for taking measures aimed at preventing and counteracting corporate fraud and involvement in corrupt practices;
- regulating procedures, control and other measures aimed at counteracting corporate fraud and involvement in corrupt practices;
- identifying key risks in the area of counteraction of corporate fraud and involvement in corrupt practices and developing measures aimed at minimizing them;
- having the reliability of business partners verified;
- managing a conflict of interest;
- defining the duties of t2 Group's personnel, whatever position they hold, to comply with the principles and requirements of the Policy and the key regulations of anticorruption laws;
- defining the liability of t2 Group's personnel for failure to comply with the Policy's requirements;
- clarifying the main requirements of anticorruption laws to t2 Group's personnel and business partners;

- ensuring the work of communication channels for disclosing facts of corporate fraud and corruption as well as responding to received signals;
- guaranteeing that a t2 Group's employee refusing to be involved in any corporate fraud and/or corrupt practices and disclosing them will not be negatively treated.

2. KEY PRINCIPLES OF COUNTERACTION OF CORPORATE FRAUD AND INVOLVEMENT IN CORRUPT PRACTICES

The Company's commitment to strictly comply with the requirements of anticorruption laws and high ethical standards in running business help strengthen its reputation among other companies and business partners.

2.1. PRINCIPLE OF THE MANAGEMENT'S PERSONAL EXAMPLE ("TONE AT THE TOP")

t2 Group's Management declares their zero tolerance of any forms of corporate fraud and corruption by personally demonstrating their responsible behavior. t2 Group's Management forms a culture of zero tolerance of corporate fraud and corruption, practically participates in the process of creation and implementation of an in-house corporate system for preventing and counteracting corporate fraud and corruption.

t2 Group's Management provides necessary assistance to the managers of structural subdivisions and other officials to help them efficiently comply with the requirements of programs for counteraction of corporate fraud and corruption (anticorruption programs), arranges their improvement, and evaluates their efficiency.

2.2. ZERO TOLERANCE OF ANY FORMS OF CORPORATE FRAUD AND CORRUPTION

t2 Group is committed to the principle of zero tolerance of corporate fraud and corruption, including a conflict of interest, by any employee of t2 Group, in any forms whatsoever, while carrying any activities.

Any forms of corporate fraud and corruption are unacceptable, whatever the amount of actual or potential damage or benefits.

2.3. SEPARATION OF INCOMPATIBLE DUTIES

The Company ensures the full separation of incompatible official duties and makes sure that an employee could not be responsible for the process implementation and control/evaluation of the process implementation at the same time so as to minimize any possibility of committing and hiding facts of corporate fraud and corruption.

2.4. LAWFULNESS

Anticorruption measures to be taken must be compliant with the rights and lawful interests of employees as provided by the Constitution of the Russian Federation, in particular, a right to privacy, personal and family secrecy, conformant to international agreements entered into by the Russian Federation, international conventions ratified by the Russian Federation, Russian anticorruption laws, and t2 Group's in-house regulatory documents. In order to minimize any and all potential corruption risks, the Company must arrange for an anticorruption expert evaluation of its internal regulatory and administrative documents and agreements.

2.5. CLEAR REGULATION OF ANTICORRUPTION MEASURES

The Company's regulatory and administrative anticorruption documents (programs, standards, action plans, recommendations, etc.) must clearly regulate the Company's measures aimed at counteracting

corporate fraud and corruption, and also provide for the liability of the Company's employees of all levels for failure to comply with them.

2.6. RESULT-ORIENTED APPROACH

When introducing a system of anticorruption measures, the Company must come up with a set of anticorruption measures aimed at achieving a real result, to be carried out on a permanent basis to avoid formalism.

2.7. ADEQUACY OF EFFICIENT AND ECONOMICALLY FEASIBLE ANTICORRUPTION MEASURES

The Company tries to ensure a balance between the anticorruption measures to be implemented and the Company's performance targets.

In this case, a corruption behavior may not be justified by the Company's interests and objectives just as too severe anticorruption standards preventing t2 Group from its normal operation may not be introduced.

2.8. REGULAR ASSESSMENT OF THE RISK OF CORPORATE FRAUD AND CORRUPTION

A plan of actions allowing to minimize the likelihood of involvement of the Company, its managers and personnel in corrupt practices must be developed and carried out by taking into account the risks the Company is exposed to in its activities.

The Company identifies, assesses, and regularly reassesses, monitors, etc. the risk of corporate fraud and corruption (corruption risks).

According to the risk assessment results, along with implementing a general plan of anticorruption measures, the Company may additionally regulate the areas of activities associated with high corruption risks.

2.9. DUE DILIGENCE PRINCIPLE

Before deciding to begin or continue business/labor relations, the Company performs due diligence of its business partners and applicants in terms of corruption and lack of a conflict of interest.

The due diligence principle is based on reasonableness and integrity, according to which the Company, while making managerial decisions and carrying out business operations, makes sure adequate information is obtained to form a reasonable opinion that a business partner or an applicant shows no signs of dishonesty.

2.10. PREVENTION OF A CONFLICT OF INTEREST

The Company has procedures for managing a conflict of interest. Managing a conflict of interest is one of the most important anticorruption mechanisms.

The Company expects that, while fulfilling their official duties every employee of t2 Group will place the Company's interests above their private interests and will prevent any situations that are considered or may be considered as a conflict of interest and will also comply with the requirements of in-house regulatory and administrative documents relevant to the management of a conflict of interest.

2.11. COLLECTIVE EFFORTS AND TRANSPARENCY

The Company publicly declares that it follows an anticorruption policy and uses efficient mechanisms of distributing information about anticorruption programs within the Company.

In order to implement this principle, the Company creates safe and accessible information exchange channels, by which the Company's personnel and other persons may confidentially, without fearing any reprisals, disclose any and all defects of anticorruption measures being taken and inform about any and all suspicious circumstances or violations of the anticorruption policy being pursued.

The Company publishes the Policy on t2 Group's corporate portal (Intranet) for its personnel and makes it publicly available in the Internet on t2 Group's official website www.t2.ru to inform its business partners and the public about t2 Group's anticorruption principles of running its business.

2.12. MONITORING AND CONTROL

The Company monitors the efficiency of and controls compliance with the procedures aimed at preventing and counteracting corporate fraud and corruption.

The Company's anticorruption policy implementation is controlled by all the participants involved in the anticorruption system according to their powers in this area.

The Company ensures a regular control of the economic feasibility of all the expenses it incurs, including in high risk areas, which include: exchange of business gifts, representation expenses, charity and sponsorship activities, payment of fees to external consultants, agents, intermediaries, and marketing expenses. The procedure for preparing, authorizing (accepting), and making the Company's payments is regulated by the relevant in-house regulatory documents and/or administrative documents.

2.13. REFUSAL TO USE REPRISALS AND SANCTIONS

No sanctions may be used against a t2 Group's employee or business partner for:

- refusing to offer or accept a bribe, act as an intermediary in commercial bribery or bribery, including if, as a result of such refusal, the Company incurred any losses, lost benefits, failed to obtain any commercial and/or competitive advantages;
- honestly disclosing information about any supposed violations, facts of corporate fraud and corruption, other abuse, or poor efficiency of control procedures in place.

If a t2 Group's employee or other person provides deliberately false information or tries to obtain any benefits, which are in conflict with the Company's interests, this person may be held liable consistent with the laws of the Russian Federation and/or the in-house regulatory and/or administrative documents.

2.14. INTERACTION AND COORDINATION

The Company ensures a coordination of actions of all the anticorruption system participants as well as cooperation with the state authorities, local self-government bodies, and law enforcement agencies in the process of counteracting corporate fraud and the Company's involvement in corrupt practices.

2.15. LIABILITY AND INEVITABILITY OF PUNISHMENT

The Company investigates all the reasonably grounded information about any violations of the procedures for preventing and counteracting corporate fraud and corruption, takes measures aimed at holding the guilty persons liable regardless of the position they hold, their length of service, status at the Company, and other conditions in cases where its employees are involved in any fraud or corruption-related offenses associated with the implementation of their labor duties.

The Company makes any and all reasonably possible and lawful efforts to unavoidably prevent any violations as promptly as possible.

3. ANTICORRUPTION MEASURES AIMED AT COUNTERACTING CORPORATE FRAUD AND INVOLVEMENT IN CORRUPT PRACTICES

The efficient counteraction of corporate fraud and corruption is based on the development and implementation of t2 Group's programs of measures encompassing an anticorruption action plan.

The programs and other in-house corporate documents clearly describe in detail the rules and procedures aimed at preventing corporate fraud and corruption, including preventing bribery (corrupt business practices) in all the areas of the Company's activities, including ethical standards and codes of conduct, management procedures, requirements for recruiting and training personnel, anticorruption control and audit rules, procedures for managing a conflict of interest, rules for charity and sponsorship, participation in charitable activities, feedback mechanisms, complaint handling, etc.

3.1. HANDLING NOTICES OF VIOLATIONS

In order to maintain a high level of trust in t2 Group, comply with the Russian and international business ethical standards, and also prevent and suppress cases of corporate fraud and corruption, the Company provides an opportunity for both its employees and business partners or other persons to inform, due to honest motives or reasonable assumption, about any and all supposed and existing cases of corruption-related offences, fraud or other violations, by using the following feedback channels:

1. Personal notification of an officer of the Internal Control and Compliance Directorate of t2 Group;
2. Ethical trust line of t2 Group: ethics@t2.ru
3. Feedback channels of Rostelecom PJSC and its subsidiaries:
 - Trust Line: 8-800-1-811-811;
 - feedback form of receiving notices of violations on the anticorruption portal: www.nocorruption.rt.ru

By using these channels, the Company's employee, business partner, or other person may, in a convenient form, including anonymously, notify of any and all known facts of embezzlement, misappropriation, fraud, bribery, commercial bribery, a conflict of interest, other corrupt practices, corporate fraud, or violations of this Policy.

Every notice is carefully considered with the relevant verification being conducted if there are good reasons for the same.

3.2. CORRUPTION RISK MANAGEMENT

A general approach to corruption risk management is developed so as to ensure their timely and full identification and accurate evaluation.

The corruption risk management process is part of the general corporate risk management system in t2 Group, is carried out on a permanent basis, and is conformant to the Company's in-house regulatory and/or administrative documents.

3.3. BOOKKEEPING, MANAGEMENT ACCOUNTING AND REPORTING

The Company strictly complies with the requirements of the laws of the Russian Federation and international standards regulating the preparation/drafting of accounting (financial) and other statements.

All the financial and business operations must be shown in accounting records in an accurate, correct, and properly detailed way, duly documented, and available for audits.

Facts of business activities not being shown in accounting records, deliberate misstatement of accounting records or supporting source accounting documents, preparation and presentation for accounting purposes of documents used to support inexistent facts of business activities, and also facts of sending deliberately misstated accounting (financial) statements to the Company's shareholders, state authorities and agencies are considered as corporate fraud and investigated in accordance with the procedure used by the Company and, in certain cases, as required by the laws of the Russian Federation.

t2 Group appoints employees personally responsible, consistent with the laws of the Russian Federation, t2 Group's in-house regulatory and/or administrative documents, for the preparation and presentation of full and accurate financial (accounting) and other statements.

3.4. ANTICORRUPTION MEASURES IN COOPERATION WITH BUSINESS PARTNERS, INTERMEDIARIES, IN PAYMENTS TO THIRD PARTIES

t2 Group expects that its business partners will comply with anticorruption laws, follow anticorruption standards and principles as provided in agreements, will be committed to high legal and ethical business running standards.

The Company welcomes its business partners' in-house regulatory and/or administrative documents dedicated to counteraction of corporate fraud and involvement in corrupt practices.

The Company forbears from engaging its business partners, other persons acting by or in behalf the Company to make payments or any other actions that are in conflict with the principles and requirements of the Policy and/or constitute corruption risks, including a risk that the Company may lose its business reputation, t2 Group's personnel and other persons in case of disclosing information about performing the same.

t2 Group makes adequate efforts to minimize the risk of establishing business relations with partners that have been or may be involved in corrupt practices.

When establishing contractual relations with business partners, the terms and conditions of agreements include an Anticorruption Clause, which contains anticorruption obligations of the parties and aims at making the parties understand that no corruption-related offenses may be committed, and also stipulates the readiness to take reasonable measures to prevent the same. The text of the Anticorruption Clause is established by the relevant in-house regulatory and/or administrative document.

The Company reserves a right to terminate agreements with business partners in case of finding out any facts or signs that they are involved in any corporate fraud or corruption.

3.5. MANAGEMENT OF A CONFLICT OF INTEREST

In order to limit the influence of any personal interest, private interests of employees, including private interests of their close relatives, their family members, related persons, on their labor

functions, business decisions to be made, t2 Group takes steps to identify, prevent, and settle a conflict of interest.

The process of managing a conflict of interest and a procedure for notifying of a supposed or existing conflict of interest are determined by the relevant in-house regulatory and/or administrative documents.

3.6. ANTICORRUPTION EXPERT EVALUATION

The Company organizes an anticorruption expert evaluation of draft agreements, in-house regulatory and/or administrative documents to avoid any risks of corruption-related offenses.

The procedure for conducting an anticorruption expert evaluation is determined by the in-house regulatory and/or administrative documents.

3.7. LIMITATIONS TO THE EXCHANGE OF BUSINESS GIFTS, BUSINESS HOSPITALITY, AND REPRESENTATION EXPENSES

The Company considers the exchange of business gifts and representation expenses, including business hospitality costs, to be the necessary part of running a business and common business practice. The Company stimulates in every way an atmosphere of honesty and transparency with respect to business gifts and business hospitality expenses.

At the same time, this practice is associated with certain corruption risks because donations/receipts of expensive gifts and incurrence of higher representation expenses may lead to suspicions that the Company or its personnel pursue selfish interests.

Gifts and business hospitality, including those in the form of services, works, discounts, fees, other advantages, must not put the receiving party in a dependent position. Employees may accept from third parties and offer business gifts and business hospitality, if they meet all the following principles:

- they meet the requirements of the laws of the Russian Federation and the Company's in-house regulatory and/or administrative documents;
- they may not be considered as commercial bribery or an attempt to influence the proper and unbiased performance by the receiving party of their official duties;
- they are not regular;
- they give rise to no reputation or other risks for the Company in case of disclosing information about such gifts or representation expenses;
- they are not offered/received in the course of holding procurement procedures or during direct negotiations while concluding agreements or other deals with business partners.

Under no circumstances may employees accept gifts from business partners or other third parties in the form of cash or cashless funds, whatever the currency, demand any gifts or offer any benefits to themselves and the Company or its employees and representatives.

No gifts may be offered to public officials, other than gifts permitted by the applicable laws of the Russian Federation. An employee offering a gift to a public official must get acquainted with the source documents proving that the value of this gift does not exceed the applicable limits and must also be ready to prove the purpose and the reason of giving the gift so as to avoid any suspicion of bribery. Pursuant to the applicable laws of the Russian Federation, a gift, whatever its value is,

business hospitality, property-related services may be considered in certain cases as a bribe or unlawful fee, if the same is offered in exchange for actions (inaction) to be carried out by a public official, a business representative, and also for general protection or connivance associated with the position held.

In order to minimize corruption risks, the exchange of business gifts and business hospitality as well as incurrance of representation expenses are regulated by the Company's in-house regulatory and/or administrative documents.

3.8. CONTROL OF CHARITY, SPONSORSHIP, AND OTHER FINANCIAL AID

The Company does not engage in any charitable activities or sponsorship and does not provide any other financial aid to directly or indirectly influence any decisions of public officials or other persons, which have an impact on the preservation or expansion of t2 Group's operations, or if such activities or aid may be perceived as an attempt to make such influence. The Company controls the purposeful use of funds provided as part of charitable activities, sponsorship, and other financial aid.

Any decisions to engage in any and all charitable activities, sponsorship, financial aid are to be approved as required by the in-house procedures.

3.9. PROHIBITION TO FINANCE POLITICAL ACTIVITIES

The Company finances or otherwise supports no politicians, political parties, political movements and their members, including candidates seeking to hold political positions.

The Company does not participate in any political activities to directly or indirectly influence any decisions of public officials or other persons, which have an impact on the preservation or expansion of t2 Group's operations, or if such participation may be perceived as an attempt to make such influence.

t2 Group's employees must declare a potential/real conflict of interest arising due to their intention to participate or their participation in political activities.

3.10. CONTROL AND LIMITATIONS IN INTERACTION WITH PUBLIC OFFICIALS, FOREIGN PUBLIC OFFICIALS, AND OFFICIALS OF PUBLIC INTERNATIONAL ORGANIZATIONS

The Company forbears from any and all promises, offers, or offers to any and all public officials, including foreign ones, as well as officials of public international organizations, their close relatives, of any unlawful advantages, including any payment or compensation by the Company or the Company's employees acting for the Company of any and all expenses associated with the participation in entertainment events, other expenses representing personal benefits for officials and their close relatives so that these officials could engage in any action or inaction when performing their official duties aimed at obtaining, preserving any commercial or other unlawful advantages.

3.11. REPORTING EMPLOYMENT OF FORMER PUBLIC AND MUNICIPAL OFFICERS

When entering into an employment or civil law agreement with a citizen that held certain public or municipal position, the list of which is set by the regulatory acts of the Russian Federation, within

two years upon retiring from the public or municipal service, t2 Group sends a relevant notice to his/her last workplace in accordance with the procedure set by the laws of the Russian Federation.

3.12. INTERACTION WITH THE STATE, THE BUSINESS COMMUNITY, AND THE PUBLIC

Interaction with the state supervisory and law enforcement agencies is an important indicator of t2 Group's commitment to t2 Group's declared anticorruption policy.

The Company publicly undertakes to report to the relevant state supervisory and law enforcement agencies any and all cases of corruption-related offenses its employees came to know about.

In cases stipulated by law, certain limitations to such reporting may be imposed, in particular for the purpose of:

- protecting any and all lawful rights, reputation, and personal information;
- protecting security and public order;
- protecting a commercial secret and ensuring confidentiality.

The procedure for t2 Group's interaction with the state supervisory and law enforcement agencies in anticorruption matters is set by the Company's in-house regulatory and/or administrative documents.

3.13. CONTROL AND AUDIT

The Company organizes control of compliance with the requirements of the anticorruption laws of the Russian Federation, the in-house regulatory and/or administrative documents, principles and requirements set by the Policy.

The Company ensures, by way of an internal audit and external independent audits, a regular evaluation of the anticorruption system efficiency, including the reliability of the procedures for counteracting unlawful actions, abuse, deliberate misstatement of accounting and management statements and reports.

3.14. INDEMNIFYING DAMAGES AND HOLDING LIABLE

The Company provides assistance in conducting a due investigation of all the reasonable suspicions of corporate fraud and corruption.

The Company reserves a right to claim damages in each case of identifying persons guilty of or complicit in corporate fraud and corruption, regardless of disciplinary, administrative, or criminal liability for action/inaction, as a result of which damage has been caused to the Company, consistent with the laws of the Russian Federation and the in-house regulatory and/or administrative documents.

3.15. PERSONNEL TRAINING AND CONTROL

Based on programs for preventing and counteracting corporate fraud and corruption, the Company organizes training and educational events (briefings, trainings, seminars, surveying, testing of personnel, etc.) and helps actively involve its personnel in the implementation of anticorruption programs. The training programs are developed by taking into account the functions and responsibilities of the trainees and are regularly revised in order to improve their efficiency.

The Company takes steps to make its personnel comply with the requirements of anticorruption programs and guarantees that no employee of the Company will suffer in terms of his/her career or financial opportunities, if he/she rejects any corrupt activities, even if such rejection will lead to losses sustained by t2 Group.

4. COMPANY'S ORGANIZATION STRUCTURE FOR COUNTERACTING CORPORATE FRAUD AND INVOLVEMENT IN CORRUPT PRACTICES

***IMPORTANT!!!** The contents of Section 4 are not to be publicly disclosed, are designed to be used by the Company's personnel, and may not be published on external resources.*

Efforts to prevent corporate fraud and counteract corruption at t2 Group must be regular, permanent, and coherent.

The model of functions of the anticorruption system participants as provided in this Section is described at the level of t2 Group and may extend to t2 Group Companies by taking into account their organizational specifics.

The organizational structure of managing the Company's anticorruption system at all of its hierarchical levels is formed by taking into account the risk of corporate fraud and corruption occurrence.

5. PERSONNEL'S ANTICORRUPTION DUTIES

All the Company's employees interact with their direct managers as well as with the Internal Control and Compliance Directorate, the Security Directorate, the Division dealing with the personnel responsible for counteracting and preventing corporate fraud and corruption.

All the employees of t2 Group, regardless of their positions and length of service at t2 Group, must conform to the Policy's provisions and strictly follow its principles and requirements while performing their official duties:

- a) forbear from committing, participating in corporate fraud, corruption-related and other offenses in their interests or on behalf of t2 Group;
- б) forbear from a behavior that may be interpreted by others as willingness to commit or participate in corporate fraud or corruption-related offenses for or on behalf of t2 Group;
- в) report the following to the Internal Control and Compliance Directorate and the Security Directorate of t2 Group without delay:
 - cases where an employee is urged to get involved in corruption-related offenses;
 - cases of corruption-related offenses committed by t2 Group's other employees, t2 Group's business partners, or other persons;
 - an employee's potential or existing conflict of interest (declaration of a conflict of interest or its indications).

6. PERSONNEL'S LIABILITY FOR FAILING TO MEET THE ANTICORRUPTION POLICY REQUIREMENTS

All of t2 Group's employees, whatever positions they hold, are subject to personal responsibility and liability for compliance with the principles and requirements of the Policy as required by the applicable laws of the Russian Federation.

Persons guilty of failing to comply with the Policy requirements may be held liable for a disciplinary, administrative, civil law, and criminal offense in accordance with the procedure and on the grounds stipulated by the laws of the Russian Federation, t2 Group's in-house regulatory documents and employment agreements.

If an employee causes any material damage to t2 Group as a result of not meeting the requirements of an in-house regulatory and/or administrative document, this employee must indemnify such damage in accordance with the procedure set forth by the laws of the Russian Federation.

t2 Group conducts investigations of each reasonable suspicion or existing fact of corruption within the framework permitted by the laws of the Russian Federation.

When legal liability is applied to employees that violated the provisions of the in-house regulatory and/or administrative documents relevant to compliance with the Policy, the following key principles are taken into account as well:

- *adequacy and proportionality*: sanctions must not be too "lenient" or too "severe";
- *inevitability*: sanctions must be imposed regardless of the position held, length of service, and other conditions;
- *control*: sanctions must be imposed according to the results of control measures.

7. TERMS AND DEFINITIONS

For the purposes of this Policy, the terms and abbreviations defined in the corporate glossary of terms and definitions of LLC "T2 Mobile" as well as the following terms, definitions, and abbreviations of the terms are used:

No.	Term	Definition
1.	t2 Group's Shareholders	Members of "T2 RTK Holding" Limited Liability Company, which directly or indirectly holds a 100% interest in the authorized capitals of t2 Group Companies.
2.	t2 Group's Anticorruption Policy, abbreviated: the Policy (as a document)	Framework in-house regulatory document defining the main approaches to the implementation of anticorruption measures and measures aimed at preventing corporate fraud.
3.	Anticorruption Policy (as activities)	Justified, consistent, and regular activities implying a set of interrelated principles, procedures, and measures aimed at preventing and suppressing corruption-related offenses and corporate fraud in the Company's activities, according to which the Company's in-house anticorruption regulatory and/or administrative documents are prepared.
4.	Anticorruption Activities	The Company's activities aimed at preventing and counteracting corporate fraud and involvement in corrupt activities.
5.	Anticorruption Laws	Federal Law No. 273-FZ "On Corruption Counteraction" dated December 25, 2008, Criminal Code of the Russian Federation, Civil Code of the Russian Federation, Administrative Offenses Code of the Russian Federation, and also other federal laws and bylaws of the Russian Federation containing regulations aimed at counteracting corruption and corporate fraud, as amended.
6.	Anticorruption Commitments	Consent of business partners and participants in t2 Group's procurement procedures to comply with the Policy's principles and requirements, including commitments to forbear from corruption-related and other offenses.
7.	Anticorruption Monitoring	Monitoring, analysis, evaluation and forecast of corruption-related offenses, corruptogenic factors, as well as anticorruption policy implementation measures.
8.	Anticorruption Expert Evaluation	Activities aimed at identifying and describing corruption factors, evaluating the degree of corruption risks, and preparing recommendations for eliminating or limiting such factors and corruption risks they cause.
9.	Anticorruption Standards	Uniform guarantees, limitations, or prohibitions for a separate area of legal regulation, permitting to prevent or minimize the impact of corruption on this area.
10.	Anticorruption Clause	Section of t2 Group's civil law agreement which includes special clauses declaring t2 Group's Anticorruption Policy that provide for an obligation of the parties to follow the principles of the fair business running and prevention of corruption-related and other offenses.
11.	Charity	Voluntary activities of citizens and legal entities consisting in disinterested (free or preferential) transfer of property to citizens or legal

		entities, including funds, disinterested performance of works, provision of services or other support. Charity includes no transfer of funds and other tangible assets to state authorities or local self-government bodies, commercial organizations, or support of political parties, movements, groups, and campaigns.
12.	Bribe	Receipt by an official, a foreign official, or an official of a public international organization, whether in person or through an intermediary, of funds, securities, other property or provision of unlawful property-related services, other property rights in exchange for actions (inaction) to the bribe recipient or the persons represented by the former, if such actions (inaction) are (is) part of the official's powers or if he/she may, due to his/her official duties, contribute to such actions (inaction), as well as for general protection or connivance.
13.	t2 Group's General Director	General Director of LLC "T2 Mobile"
14.	Business Hospitality	<p>Element of the image strategy making an integral part of the corporate culture and shown as politeness, kindness to the Company's guests while holding various events, including representation ones, during which a guest enjoys business hospitality, for which he/she pays nothing or makes partly payment.</p> <p><i>Business hospitality</i> may include: organizing a reception of a delegation, accommodating guests at temporary accommodation places, catering, providing motor vehicles, organizing negotiations (conferences, meetings, presentations, trade fairs, exhibitions, etc.), arranging sightseeing, social, and cultural programs, as well as business gifts, souvenir products, etc.</p>
15.	Business Partner	<p>External party the Company maintains or plans to maintain any business relations with, other than Customers.</p> <p><i>Note 1 to the definition: A business partner includes, but not limited to, counterparties, partners in a joint venture, partners in a consortium, suppliers of outsourcing services, contractors, consultants, subcontractors, suppliers, sellers, advisors, agents, distributors, representatives, intermediaries, and investors. This definition has been deliberately expanded and it should be interpreted according to the structure of the Company's corruption risks so that it could be applied to business partners that may really expose the Company to corruption risks.</i></p> <p><i>Note 2 to the definition: Various categories of business partners cause various types and degrees of corruption risks and the Company will have a various degree of a possibility to influence various business partners. Various measures may be applied to various categories of business partners when the Company conducts procedures of evaluation of corruption risks and their management.</i></p>
16.	Interested Person (or Interested Party)	<p>Individual or legal entity that may influence or which may be influenced or believes to be influenced by a decision or action.</p> <p><i>Note 1 to the definition: An interested person may be internal or external for the Company.</i></p>
17.	Corruption Indicator	Indicator (including the quantitative one) showing potential corruption-related offenses when deals are concluded (decisions are made). Corruption indicators are to be applied during an anticorruption audit of deals and enable a subdivision or persons responsible for preventing

		corruption to identify, on their own without receiving external information, any suspicious and potentially corrupt deals.
18.	Customer	<p>Individual or legal entity that signed an agreement for services with the Company, profiting from its services without an agreement or intending to enter into an agreement.</p> <p><i>Note:</i></p> <p><i>For the purposes of counteracting money laundering/financing terrorism, the Customer is an individual or a legal entity lawfully ordering the Company to perform a transaction involving funds.</i></p>
19.	Commercial bribe	Unlawful acceptance by a person, fulfilling managerial functions at a commercial or other organization, of funds, securities, other property, just as unlawful use of property-related services or other property rights in exchange for actions (inaction) benefiting the giving party due to this person's official post (Part 1 of Article 204 of the Criminal Code of the Russian Federation).
20.	Compliance	Ensuring compliance of t2 Group's operation with the requirements of the Russian and applicable foreign laws, other binding regulatory documents, and also creation of mechanisms for analyzing, identifying, and evaluating compliance risks, as well as best ethical business practices.
21.	Compliance Risk	<p>Risk arising due to the Company's failure to comply with the applicable laws, industry-specific standards, as well as the in-house regulatory and/or administrative documents, adopted business ethics standards, which may lead to:</p> <ul style="list-style-type: none"> • imposition of legal sanctions; • considerable financial loss; • business reputation loss. <p><i>Note to the definition: The corporate fraud and corruption risk is part of the compliance risk arising due to the Company's failure to comply with the applicable anticorruption laws, and also in-house regulatory and/or administrative documents regulating activities aimed at counteracting corporate fraud and involvement in corrupt practices.</i></p>
22.	Due diligence process	<p>The due diligence process aims at identifying the risk indicators, which show the legal, commercial, industrial, and reputation risks in case of dealing with a business partner as well as controlling relations with them. The due diligence purpose is to prove that a business partner follows common ethical standards of running a business and complies with the principles of zero tolerance of any corrupt practices.</p> <p><i>Note to the definition: Due diligence means using proper care (honesty), taking actions aimed at obtaining an objective picture of a business partner.</i></p>
23.	Conflict of Interest	Situation in which the personal (direct or indirect) interest of one or several employees of t2 Group and (or) their related parties, as well as members of the collective governing bodies of t2 Group, affects or may affect the employee's due performance of his/her official (labor) duties, and in which there is or there may be a contradiction between the employee's personal interest and rights and lawful interests of a t2 Group Company, which may lead to any damage to the lawful interests, property and/or business reputation of the t2 Group Company.

24.	Corporate Fraud	<p>Unlawful actions of the Company's employees and/or management aimed at obtaining personal gain (which may consist mostly in financial or other benefits). There are two types of corporate fraud:</p> <ul style="list-style-type: none"> • internal fraud committed by the Company's management and personnel; • external fraud committed by business partners, related and other parties. <p><i>Note: Corporate fraud may consist in manipulations of reports (misstatement of financial and non-financial reports), certain corrupt practices, misappropriation of or damage to the Company's assets, as well as any other abuse.</i></p>
25.	Corruption (Corrupt Practices)	<p>Abuse of office, offer or promise of a bribe, demand or receipt of a bribe, mediation in bribery, abuse of powers, disclosure of a commercial secret and commercial bribe, payments to facilitate any administrative, bureaucratic, or other formalities in any form whatsoever, including in the form of funds, other securities, services or offer/acceptance of unreasonable financial and non-financial benefits from any persons/organizations or to any persons/organizations, including representatives of state authorities, nongovernmental organizations, private companies, and politicians, or an individual's abuse of his/her powers in conflict with the lawful interests of t2 Group, the public and the state in order to gain benefits such as funds, securities, other property or property services for him/her or for any third parties, or unlawful provision of such benefits to the above person by other individuals. Corruption also includes the aforementioned activities for or on behalf of a legal entity.</p>
26.	Corruption-Related Offense	<p>Unlawful action characterized as corruption.</p>
27.	Corruption Risk	<p>Risk of imposition of legal sanctions or sanctions of regulators, considerable financial loss or loss of the Company's reputation due to failure to comply with the requirements, provisions, regulations and standards of anticorruption laws, in-house regulatory and administrative documents bearing on the Company's areas of operations. Possibility of committing a corruption offense arising in cases where there are corruption factors.</p>
28.	Corruption Factors	<p>Conditions, an event or a series of events, objective and subjective prerequisites giving rise to corruption-related offenses or contributing to their occurrence, and also provisions of the Company's in-house regulatory and/or administrative documents setting unreasonably wide limits of discretion or an opportunity to unreasonably use exceptions from the general rules, as well as provisions containing unclear, difficult, and/or burdensome requirements for the Company's personnel, its business partners, and, therefore, creating conditions for corruption.</p>
29.	Personal Gain	<p>Interest in obtaining intangible benefits and advantages shown by an official/employee and/or his/her close relatives.</p>
30.	Employee's Personal Interest	<p>Interest associated with a possibility for an employee performing his/her official (labor) duties to obtain gains such as funds, securities, other property, or property services, other property and non-property benefits/rights for themselves or for third parties.</p>

31.	Illegal Gratification	Unlawful transfer, offer, or promise, for or on behalf of the Company, of funds, securities, other property, provision of property services, property rights to an official, a person performing managerial functions at a commercial or other organization, a foreign official or an official of a public international organization to have an official, a person performing managerial functions at a commercial or other organization, a foreign official or an official of a public international organization perform an action (inaction) associated with their official position in the interests of this legal entity.
32.	Pre-Conflict of Interest (Situation with Characteristics of a Conflict of Interest)	Situation having characteristics of a conflict of interest, namely a situation where t2 Group's employees as well as the procurement customer/organizer or its representatives, performing their official or professional activities, have personal interest, which may lead to a conflict of interest, but its occurrence is not obvious and the situation needs to be additionally analyzed.
33.	Employee	Individual entering into labor relations with the employer. t2 Group Companies may be considered employers within t2 Group Companies.
34.	t2 Group's Management (Management)	General Director of LLC "T2 Mobile" and Management Team of t2 Group.
35.	Reputation Risk	<p>Risk of damage to the Company's image due to it being negatively perceived by its customers, business partners, creditors, investors, shareholders, supervisory bodies, analysts, causing the Company to sustain damages due to an impact of internal and external risk factors, including:</p> <ul style="list-style-type: none"> • Company's failure to comply with the applicable laws, constitutional and in-house documents, business practices, principles of corporate ethics and business conduct, publication of inaccurate statements, default on contractual obligations; • lack of mechanisms in the Company's in-house regulatory and/or administrative documents, which would permit to efficiently settle a conflict of interest and minimize negative consequences of a conflict of interest, including prevention of lawsuits by business partners and/or enforcement actions taken by regulatory and supervisory bodies; • defects in the staffing policy when recruiting and appointing personnel; <p>publication of negative information about the Company, members of the governing bodies, affiliates, and/or employees of t2 Group in the media.</p>
36.	Anticorruption System	System for preventing and counteracting corporate fraud and involvement in corrupt practices.
37.	Sponsorship	Offer of funds or provision of funds for organizing and (or) holding a sports, cultural, or any other events, creating and (or) broadcasting a television or radio program, or creating (or) using other results of creative activities.
38.	Branch Office	Separate subdivision located outside the location of LLC "T2 Mobile" and performing all or part of its functions.

39.	Ethical Trust Line	Safe and confidential feedback channels to report to t2 Group any intentions or facts of corrupt practices and fraud by t2 Group's personnel and also to be used for consultation purposes.
Person/Persons Category Terminology:		
40.	Close relatives and family members	<p>Persons being nearly related or <i>kin</i> to an official/employee: parents (including adoptive parents), children (including adopted children), full and half brothers (including cousins), sisters (including cousins), grandparents, grandchildren, spouses, as well as parents (including adoptive parents), children (including adopted children), brothers (including cousins), sisters (including cousins), grandparents, grandchildren of spouses, spouses of children, children (including adopted children) and spouses of full and half brothers and sisters.</p> <p><i>Note: Kinship - relations between people arising from a marriage of one of their relatives: relations between a spouse and relatives of the other spouse, and also between relatives of spouses. Kinship: a) arises from a marriage, including a civil one; b) is not based on blood relation; c) arises when there are living relatives of a husband and/or wife at the time of marriage.</i></p>
41.	Official	Individual, who represents the authorities on a permanent, temporary basis or according to special powers, i.e. duly vested with regulatory powers with respect to persons not being subordinated to them, and also a person performing organizational and management or administrative and economic functions at an organization, or a person duly authorized to carry out legally important actions.
42.	t2 Group's Official	t2 Group's employee acting as the General Director of t2 Group or officially authorized by the General Director of t2 Group to perform organizational and management or administrative and economic functions at t2 Group/t2 Group Company, and holding the position of manager of a functional unit or manager of a structural subdivision of a t2 Group Company / t2 Group.
43.	Public Official	<p>Any Russian or foreign, appointed or elected person holding a position at a legislative, executive, administrative, or judicial body or an international organization; any person performing a public function for the state, including a state agency, institution, or enterprise; leading politicians, officials of political parties, including candidates for political posts, ambassadors, heads and officials of state agencies, institutions, and enterprises.¹</p> <p><i>Note 1. Foreign public officials (FPO): an official performing a public function for a foreign state, including for a public agency or a public enterprise.</i></p> <p><i>Note 1. Officials of public international organizations (OPIO): a category of individuals vested with important management powers at an international organization.</i></p>
44.	Related Persons	Persons being closely related or kin (close relatives and family members), citizens and organizations, with whom/which an employee and (or) his/her close relative or kin maintains property, corporate, or other close relations.
45.	Third Parties/Other Persons	Business entities, nonprofit organizations, in the authorized capitals of which t2 Group holds no direct or indirect interest, the bodies of which include no representatives of the Company, and also individuals

		that are no employees and that do not hold any positions at t2 Group's governing bodies.
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8. REFERENCES

No.	Name of the document, external regulatory document (sources of law, standards, etc.)
1.	<p><u>International rules:</u></p> <ul style="list-style-type: none"> • The United Nations Convention against Corruption; • The Criminal Law Convention on Corruption of the Council of Europe dated January 27, 1999; • Convention against Transnational Organized Crime; • The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 1997; • Recommendations of the OECD Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions dated November 26, 2009 and its integral part "Good Practice Guidance on Internal Controls, Ethics, and Compliance dated February 18, 2010".
2.	<p><u>International Standards:</u></p> <ul style="list-style-type: none"> • ISO 19600:2014 - Compliance management systems - Guidelines; • ISO 37001:2016 Anti-Bribery Management Systems - Requirements and Guidance for Use; • ISA 240 "Fraud and Errors".
3.	<p><u>Russian laws:</u></p> <ul style="list-style-type: none"> • No. 273-FZ "On Combating Corruption" dated December 25, 2008; • No. 115-FZ "On Counteraction of Legalization (Laundering) of Proceeds of Crime and Financing of Terrorism" dated August 07, 2001; • No. 197-FZ "Labor Code of the Russian Federation" dated December 30, 2001; • No. 40-FZ "On Ratification of the United Nations Convention against Corruption" dated March 08, 2006; • No. 125-FZ "On Ratification of the Criminal Law Convention of Corruption" dated July 25, 2006; • No. 3-FZ "On the Russian Federation Accession to the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions" dated February 01, 2012; • No. 223-FZ "On Procurement of Goods, Works, Services by Certain Types of Legal Entities" dated July 18, 2011; • No. 63-FZ "Criminal Code of the Russian Federation" dated June 13, 1996; • No. 51-FZ "Civil Code of the Russian Federation (Part One)" dated November 30, 1994; • No. 14-FZ "Civil Code of the Russian Federation (Part Two)" dated January 26, 1996; • No. 146-FZ "Civil Code of the Russian Federation (Part Three)" dated November 26, 2001; • No. 230-FZ "Civil Code of the Russian Federation (Part Four)" dated December 18, 2006; • No. 195-FZ "Code on Administrative Offences of the Russian Federation" dated December 30, 2001; • No. 172-FZ "On Anti-corruption Expert Evaluation of Regulatory Legal Acts and Draft Regulatory Legal Acts" dated July 17, 2009.
4.	<p>Decree No. 96 of the Government of the Russian Federation "On Anti-corruption Expert Evaluation of Regulatory Legal Acts and Draft Regulatory Legal Acts" dated February 26, 2010.</p>

No.	Name of the document, external regulatory document (sources of law, standards, etc.)
5.	<u>Orders of the President of the Russian Federation:</u> <ul style="list-style-type: none"> • No. 309 "On Measures Aimed at Implementing Certain Provisions of the Federal Law "On Combating Corruption" dated April 02, 2013; • No. 378 "On the National Anti-corruption Plan for 2018 - 2020" dated June 29, 2018 (as amended by the President of the Russian Federation every two years); • No. 683 "On the National Security Strategy of the Russian Federation" dated December 31, 2015.
6.	Russian Business Anti-corruption Charter dated September 20, 2012.
7.	Guidelines on the Anti-corruption Measures Developed and Taken by Organizations as approved by the Ministry of Labor and Social Security of the Russian Federation dated November 08, 2013.
8.	Guidelines on the organization of risk management and internal control to prevent and counteract corruption at joint-stock companies with the participation of the Russian Federation dated March 02, 2016.
9.	Monograph "Anti-corruption Standards of the Organization for Economic Cooperation and Development and their Implementation in the Russian Federation" (edited by T. Ya. Khabrieva, A. V. Fedorov, Institute of Legislation and Comparative Law under the Government of the Russian Federation, 2015).
10.	Decree No. 24 of the Plenum of the Supreme Court of the Russian Federation "On Judicial Practices Dealing with Bribery and Other Corruption-Related Crimes" dated July 09, 2013.
11.	Note on criminal liability for accepting or offering a bribe and administrative sanctions for illegal gratification on behalf of a legal entity prepared by the Ministry of Labor of Russia (published on the official website of the Ministry of Labor in the Combating Corruption section).
12.	Guidelines on the organization of risk management and internal control to prevent and counteract corruption at joint-stock companies with the participation of the Russian Federation as approved by Order No. 80 of the Federal Property Management Agency dated March 02, 2016 (published on the official website of the Federal Property Management Agency in the section available on www.rosim.ru/activities/anticorruption/metod).
13.	<u>Foreign laws:</u> <ul style="list-style-type: none"> • Principles stated in the FCPA (US Foreign Corrupt practices Act of 1977); • Principles stated in the UK BA (UK Bribery Act dated April 08, 2010).

9. DOCUMENT INFORMATION

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9.3. Document owner: [Deputy General Director for Corporate Security].

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