HANDBOOK. CONFLICT OF INTEREST

Memorandum



A CONFLICT OF INTEREST —

is a situation when employee's personal interests (including interests of related parties*) contradictor may contradict the company's interests.

*Related Parties mean family members, as well as other parties (individuals, legal entities) related to the employee through close (including marriage, cohabitation) or other corporate, property relationships causing occurrence of personal interest.

MTS'S POSITION —

all employees and members of management bodies act in favor of the Company when exercising official powers avoiding a Conflict of Interest (CoI). If the CoI can not be avoided it must be declared and settled.

In all cases of occurrence or risk of occurrence of conflicts of interest the information on them must be disclosed to the company.

FREQUENT CASES OF CONFLICT OF INTEREST

- Performance of functions of a head, Member of the BoD, of the Management Board beyond the MTS Group
- Financial interest (more than 20%) beyond the company
- Use of business opportunity for personal advantage
- Holding the position as a public official
- Use of assets, confidential information and/or working time in the Company for personal advantage
- Related parties working as subordinates, Related Party Transactions
- Gifts and hospitality
- Other

WHAT TO DO IN CASE OF DETECTING ANY SIGNS OF CONFLICT OF INTEREST?

By sending an email external.hotline.mts@b1.ru