

GIFTS AND BUSINESS HOSPITALITY IN MTS

A gift shall mean Anything of value transferred or received by the Company, as well as by the Persons covered by the Policy, at no cost.

For example:



Bouquet of flowers, candy, champagne, books



Items with the company's brand image (clothing, mugs, memory - cards, etc.)



Memo pad, pen



Business hospitality shall mean various expenses of a company to welcome and serve representatives of other organizations in order to establish and/or maintain mutual cooperation (including entertainment allowance).

For example:

- Business breakfasts/lunches/dinners;
- Events with the participation of customers/counterparties where the company acts as an organizer, for example, exhibitions, sports events, etc.;
- Travel/accommodation related to the need to attend a business conference.



ACCEPTABLE gifts and business hospitality signs

Shall be properly reflected in the accounting and financial statements of the Company

Have reasonable cost and comply with the limits established by the Policy

Are not regular (no more than 4 times per calendar year to one recipient)

Are agreed in accordance with the MTS Policy, meet the requirements of counterparties (local regulations, contracts)

Have a legal business purpose

Are not aimed at providing illegal benefits and preferences

Are not extravagant (luxurious) (for example, a collection of antique vases)

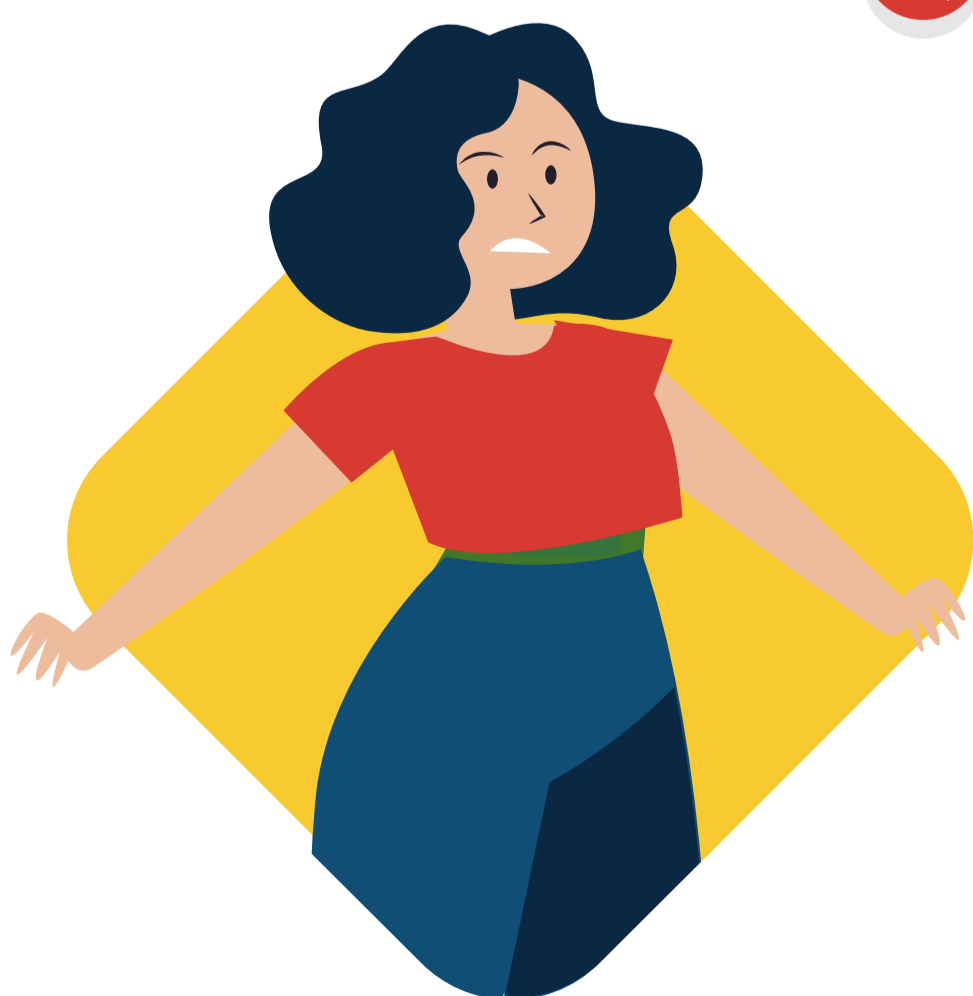
Are not prohibited by law (e.g. firearms)

Comply with normal business practice (behavior patterns), cultural traditions, circumstances (for example, a national holiday)



UNACCEPTABLE gifts and signs of business hospitality

It is Prohibited



In the form of cash and cash equivalents. For example: gift certificates with the ability to cash out, securities, precious metals (stones), cash and traveler's checks, cryptocurrency, loans, etc.



In order to influence (exert pressure) the recipient and/or reward the recipient on exchange for a counter provision. For example: cooperation, service of any kind, etc.



During the period of the tender (procurement procedures), negotiations/business decisions, decision-making by the controlling (supervisory) body, etc.



Consequences: imposition of disciplinary, administrative, civil and even criminal sanctions