



Kcell JSC Anti-Corruption Policy

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Approved by
Kcell JSC Board of Directors

Kcell Anti-Corruption Policy

Kcell JSC (Kcell) is committed to the highest norms of business conduct. We act in a responsible way, based on our Code of Ethics and Conduct. We advocate free and fair trade, striving for forthright competition and ethical conditions within the legal frameworks of the countries in which we operate.

Kcell has a clear statement against bribery and corruption:

- Kcell does not accept bribery or corruption in any form.
- At Kcell we do not offer, authorize or pay bribes or anything of value to obtain or retain business or to encourage or reward a decision.
- At Kcell we avoid an interest or situation that conflicts, or may appear to conflict, with our professional duty.

Scope

We expect every employee, in Kcell and in companies where Kcell has management control, to follow this Policy as our way of conducting the business.

We also work towards adopting the principles of this Policy in all the operations in which Kcell has ownership interests.

Roles and Responsibilities

All Kcell employees are individually responsible for reading, understanding and complying with this Policy. Each employee is responsible for acting in accordance with this Policy, and is encouraged to voice concerns and to highlight examples of good practice.

Every line manager is responsible for ensuring that each team member has access to this Policy and related Instruction and Guiding Principles. The line manager is also responsible for ensuring that there are relevant activities and internal controls in place to prevent and detect bribery and corruption.

Day-to-day reinforcement, including regular information and training on anti-corruption issues, as well as compliance follow-up, is part of every manager's responsibility, with the support of the Ethics and Compliance service of Kcell.

Corruption

"Corruption" is the abuse of entrusted power for private gain

Bribery

A "bribe" means offering, providing, authorising, requesting, accepting or receiving a financial or another advantage with the purpose to encourage improper performance or to misuse a person's position. A bribe does not necessarily involve money.

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No employee of Kcell shall offer, provide, authorise, request, accept or receive a bribe either directly or indirectly, including through any third party.

It is also prohibited to contribute financial means to any third party in a way that could constitute negligent financing of corruption. Due care should be exercised to ensure that money paid to third parties, for example to agents, partners, vendors and consultants, is not used for corruption.

Conflict of interest

Conflict of interest occurs when financial or other personal considerations may – or may appear to – affect an employee’s loyalties and professional judgement and performance of their duties.

Kcell employees are expected to act at all times in Kcell’ s best interest and to exercise sound judgement unaffected by private interests or divided loyalties.

Facilitation payments

Facilitation payments are payments made to government officials for carrying out or speeding up routine procedures. All employees are prohibited from making or accepting facilitation payments.

Gifts and Hospitality

Kcell employees shall approve business hospitality and gifts proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship.

We do not offer or accept gifts, payment or hospitality to encourage or reward a decision. Gifts or business hospitality must be offered or accepted only if in accordance with local legislation, the Instruction and further guidance relating to this Policy.

Sponsorship and Donations

It is not permissible to use charitable or political donations or sponsorships as a way of concealing a bribe.

Third parties

Due care is exercised when engaging with third parties – e.g. partners, suppliers and agents. Particular red flags are investigated and necessary precautions and actions are taken to eliminate or mitigate the risk for bribery and corruption in relation to third parties.

All procurement activities at Kcell shall be performed in compliance with the *Procedure for procurement of goods and services from single source required for Kcell JSC to perform its statutory activities* and other procurement-related documents which clearly state basic principles regarding fair selection of suppliers and segregation of duties.



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The mergers and acquisitions are conducted according to Kcell M&A handbook, which stipulate principles for practicing due care and performing anti-corruption due diligence procedures.

Keeping records

We keep accurate and transparent records. This includes that gifts and hospitality as well as sponsorships and donations are recorded to reflect the nature and purpose of the activity. We also keep records of the needed approval documents and verification of third parties.

Reporting concerns

Any Kcell employee who suspects violations of the Code of Ethics and conduct or this Policy is encouraged to Speak Up and raise the issue to their line manager, Ethics and Compliance Office or to use the Speak Up line.

At Kcell we do our best to support and protect all employees from retaliation.

Any action or behavior that could be seen as corruption or bribery must be promptly reported to the management and investigated in accordance with Instruction for Internal Investigations, corrected and will be subject to disciplinary action.