

APPROVED by
Resolution of the Board of Directors of
Mobile TeleSystems
Public Joint Stock Company
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Code of Business Conduct and Ethics of Mobile TeleSystems Public Joint Stock Company

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FOREWORD FROM THE MANAGEMENT BOARD OF MTS

Dear Colleagues,

In front of you – the Code of Business Conduct and Ethics of MTS¹ (hereinafter – the “Code”). That is a set of main rules of behavior and business practice principles of our team.

MTS is the company of action and creation. We have grown up as a digital ecosystem. It connects cultural diversity of our businesses by common philosophy **#ThisIsMTS** and common goals of MTS business strategy oriented to long-terms relations with clients via focusing on their needs, loyalty increase and better terms for products.

To feel the spirit of the Code better it is essential to understand the principles behind **#ThisIsMTS** that inspire our team, encourage to achieve the best result and do our best in everything we are doing.

When developing the products **#ForTheCustomer**, communicating internally and externally **#FastInEssence**, expressing an active position **#TakeAnAction** and **#DoltCool**, we **#Together** prove by our daily conduct and results that MTS is **#MoreThanAJob**.

At the same time despite the business strategy that is known as a living tool guiding to the success of our company and despite unique environmental opportunities, MTS is sustainable in terms of responsible business practice and zero tolerance to business conduct and ethics violations in any part of our ecosystem.

Ethics, honesty and fairness are the cornerstones of our behavior and mandatory requirement to managers, employees and members of the governing bodies of MTS. The commitment to basic values of the company, - ethics, responsible business practice, conscious and responsible attitude towards the company resources, proactivity and openness, wish to do more to exceed expectation of the client, colleague or the business partner in every touch point – is the key to sustainable business growth and MTS gain of competitive advantage in long-term perspective.

We as members of the MTS Management Board see our role not only in strict adherence to the Code but rather in explanation and support of the Code proper understanding to all the employees and stakeholders of the ecosystem. And we as all the MTS team will do our best to secure our direction embodying the Code principles in all aspects of daily work.

¹ Mobile TeleSystems Public Joint Stock Company, hereinafter – MTS.

1. INTRODUCTION

1.1. WHAT IS THE CODE AND WHY DO WE NEED IT?

The Code contains the principles, standards of conduct and business practices adopted by MTS, which guarantee honest and fair treatment of our team members, partners, customers, and compliance with the applicable laws and internal regulations of the company.

Employees and directors of MTS, when performing their duties on behalf of MTS, shall act in accordance with the law, faithfully, in compliance with ethical standards and for the benefit of the company. The Code will help to recognize the situations at the right time that do not comply with the ethical principles of MTS.

MTS implements and maintains a training program for employees and directors on the requirements of the Code through a specially elaborated training system: on a regular basis but in no event less than once per 2 (two) years in face-to-face, remote or other available format according to the Annual Training Plan available at the Intranet.

WHOM THE CODE IS APPLIED TO?

The provisions of the Code apply to all employees and directors of MTS, regardless of position, duties, length of service and place of work, including all subsidiaries, affiliates and joint ventures that we control.

We support and strive, whenever possible, to ensure that affiliates not controlled by MTS, as well as partners and counterparties, conduct their activities in accordance with the standards established in this Code. If you engage third parties to work with MTS, make sure that the business partner has a proper image and shares the ethical standards set forth in the Code.

1.2. AMENDMENTS AND CONTRADICTIONS

The Code may be amended and supplemented considering the applicable law, inter alia, by individual regulations, at any time without prior notice. The Code is a public document, which can be read on the Company's official website: **www.mts.ru**

If any part of this Code contradicts to local laws or regulatory legal acts, only those sections of this Code that do not contradict to the applicable laws and regulatory legal acts shall apply.

2. ETHICS OF DECISION MAKING

Only fair business is sustainable. Actions of each of us can directly affect the business standing and financial position of the company, which means that it is the responsible and deliberate ethical behavior of each employee that guarantees business continuity of the entire company.

2.1. PRINCIPLES OF DECISION MAKING

The Code sets forth basic principles for behavior and decision-making, however, it is impossible to foresee every situation that may arise.

If you are not sure how to act, ask yourself the following questions:

- Is it lawful?
- Is it fair and honest?
- Does it meet the MTS interests?
- Does it comply with the company's rules?

- Do I have the authority for it?
- Will I feel comfortable if the information on my actions is published in the media?

If the answer to any of these questions is “No”, you should not do what you were going to do.

If you have questions about the topics covered in the Code, doubts about whether a situation is regulated by the Code or whether it is a violation thereof, you should discuss this situation with your immediate or senior manager, or send a question to the compliance function (compliance@mts.ru).

2.2. RESPONSIBILITY OF MANAGERS

Company managers and directors have an additional responsibility to create and maintain a work environment, which guarantees that members of your team know and understand their responsibilities, feel confident and can freely express their concerns, and listen carefully to such concerns and take appropriate action.

3. RESPONSIBLE BUSINESS PRACTICE

3.1. COMFORTABLE WORK ENVIRONMENT

MTS strives to provide decent and safe working conditions.

The ethical imperative of our Company: to respect human rights, create a productive work environment; manage such issues as occupational health, safety and psychological well-being of our employees properly.

In accordance with the Code, MTS employees and directors shall do their best to create a supportive work environment in which everyone has the opportunity to reach his/her full potential and not be subjected to oppression, prejudice and discrimination of any kind. MTS suppresses unacceptable behavior both in relation to employees and directors and on their part.

Additional information on this topic is disclosed in the ***internal labor regulations***.

3.2. CONFLICT OF INTEREST MANAGEMENT AND OTHER BUSINESS PRACTICES

We cannot allow personal interests, such as personal relationships with a customer, supplier, competitor, business partner or other MTS employee, to have an actual impact on the ability of our employees to make fair and objective decisions while working for MTS, or to allow such a semblance.

Not every conflict of interest is a problem, but if not properly communicated and resolved, it can have negative consequences for the employees, directors and the company itself. The best rule for any conflict of interest situation is to “refrain” and “disclose”: if participation in an event or activity that creates a conflict of interest cannot be avoided, report it and refrain from participating in appropriate decision-making until the conflict is resolved.

The rules for conduct in the event of a conflict of interest, including in the course of external business relations, membership in boards of directors, investment activities, are described in more detail in the ***conflict of interest management policy***.

Besides, MTS has developed and supports the principles of responsible ***giving and receiving of gifts and signs of business hospitality***, and has established criteria for their acceptability in the relevant ***policy***. MTS does not allow gifts to be used in bad faith, for example, in order to obtain an unlawful advantage.

3.3. ASSETS PROTECTION OF MTS AND THIRD PARTIES

Each employee shall protect MTS assets, including material and intellectual property, confidential information, personal data, against theft, damage, misuse and improper disposal. This duty also applies to assets entrusted to us by third parties.

- Any transfer of **state secrets or other classified information** shall strictly comply with required security procedures.
- MTS employees and directors use **MTS confidential information** only for business purposes and shall always store and dispose of such information in accordance with the requirements of the **information security arrangements**.
- To enable you to perform work, MTS can provide you with access to **personal data** of customers, employees, business partners, counterparties, etc. This data requires particularly careful and responsible handling and strict adherence to **policies regarding processing of personal data**: their protection is the priority of the same importance as business continuity.
- **Intellectual property** is one of the most valuable assets of MTS. We protect our intellectual property items and respect the intellectual property of other market participants.

Always keep in mind that misuse or disclosure of such information, even within MTS, can seriously damage the business standing of the company, its customers, business partners and the professional community, subject MTS to liability and damage its business operations. Immediately report any actual or suspected incident, or improper use of MTS assets through the communication channels about violations available to you.

3.4. FAIR TRADE

MTS builds **long-term relationships with customers** by providing high quality and safe services and products of the MTS ecosystem, and comfortable service conditions. Not a single client contact must go unanswered.

MTS uses **fair practices to promote services** that exclude their perception as unethical or capable of causing harm to customers, partners or third parties.

We do not gain competitive advantage through illegal and unethical practices, including through collusion and corrupt practices. MTS employees and directors may not negotiate prices or enter into any formal or informal agreements with any competitor regarding prices, discounts, business conditions or market segments and channels in which the Company competes if the purpose or result of such discussion or agreement does not comply with the applicable laws.

4. COMPLIANCE WITH LAWS

Employees and directors of MTS shall comply with applicable laws and regulations of MTS, regardless of the place of conduction of their business.

4.1. PROHIBITION OF CORRUPTION AND BRIBERY IN ANY FORM

Employees and persons acting on behalf of or for the benefit of the company, are not allowed by MTS, either independently or through intermediaries, to offer, promise, make, approve, require or accept any illegal payments and other illegal benefits from any public or private persons for the purpose of obtaining or maintaining a business or managing it, or to gain other unlawful benefits in the implementation of their activities.

MTS does not make facilitation payments and does not participate in political activities, including funding parties and candidates for political office.

Any transactions associated with potential corruption risks (including gifts, entertainment allowance, interactions with government officials or government agencies, sponsorships and charities, etc.), due to the risk of influencing a business decision, are subject to the **anticorruption policy** and internal compliance controls of MTS.

4.2. ACCOUNTING AND DISCLOSURE OF INFORMATION

Transparent accounting

We want our customers, employees, business partners, shareholders and investors to have sufficient information about our activities. We strive to be open and active in our communications. Information disclosure is undertaken in a way ensuring a reasonable balance between the informational transparency and protection of the company's commercial interests.

Disclosure of information

MTS does its best to ensure that its accounting ledgers, reports, invoices and financial statements are kept with proper degree of detailing, properly reflect the company's operations in accordance with the applicable law and the internal control system.

Everyone shall remember that accurate reporting is important, not only because regulators mandate it, but also because the data helps the company to remain competitive in the marketplace. Therefore, the business information you provide shall always be accurate, timely, complete, fair and understandable. MTS prohibits falsification of documents, distortion of the true nature of any operations.

Being a public company, we fully comply with the disclosure requirements of the applicable laws, regulators and exchanges.

We also ensure the transparency of our activities by openly interacting with various stakeholders and regularly publishing complete, reliable, timely and understandable information of both financial and non-financial nature, which is necessary for stakeholders to make investment or other decisions, to form a complete and objective view of the MTS activities.

Public communications

The brand and business standing of MTS is one of our most valuable assets, and the company's position in the market depends largely on their protection and promotion.

The MTS **policy on interaction with the information community** defines the authorized persons entitled to represent the company in open sources.

Employees shall remember that any expression of their subjective opinion in social media or other public resources is interpreted by the public as the official position of the company. In view of the above, MTS warns against participating in discussions on topics, commenting on which is prohibited in the public setting and/or may harm the business standing of the company and its capitalization.

4.3. USE OF INSIDER INFORMATION

In the course of his/her work, each employee may become aware of essential information about MTS or other organizations, before this information becomes public. The use of such insider

information to obtain personal benefits for an employee or third parties violates the legal requirement and is not acceptable for MTS.

For example, until announced publicly, information concerning the Company's financial results is insider information, and its use, even in the form of advice to a related party, would be a violation.

Employees and directors of MTS are not allowed to make transactions with securities of MTS and other companies in respect of which they have insider information, or recommend to third parties to perform such transactions, or transfer material non-public information to other persons without the explicit permit given by the company.

5. RESPONSIBLE LEADERSHIP FOR SUSTAINABLE DEVELOPMENT

It is impossible to imagine the life of a modern society without telecommunication products and digital technologies. The above imposes a special responsibility on MTS, whose activities can affect the economic, social and environmental development of the regions where it operates.

We describe in more detail the responsible behavior of the company in the annual ***sustainable development reports of MTS***.

5.1. RESPONSIBILITY FOR DECISIONS MADE

We acknowledge that the innovations we use to improve business efficiency and to increase the level of customer satisfaction are a global factor that opens up not only new business opportunities, but also pose risks for MTS. Therefore, MTS tries to adhere to the principles of sustainable development: it conducts business in compliance with ethical standards, takes responsibility for the consequences of decisions made and its activities, as well as for the impact of these consequences on society.

5.2. IMPACT ON LOCAL COMMUNITY

We strive to contribute to the economic development and social well-being of local communities and territories in every region where the company operates by establishing partnerships with local stakeholders and organizations.

MTS also encourages employees to invest their personal time and resources on supporting communities, performing charitable acts, and providing them with opportunities for development.

5.3. ENVIRONMENTAL PROTECTION

In our work, we support the principle of environmental efficiency, striving to minimize the impact of MTS activities on the environment.

6. REPORTING VIOLATIONS

MTS maintains a culture where concerns can be reported, supporting an open and trust-based dialogue with employees at all levels.

6.1. REPORTING

If you have information or suspicions about a possible violation of the Code, company regulations or the applicable law – report it!

MTS has developed and maintains special procedures for employees and any other parties wishing to report violations. You may choose any form convenient for you:

- inform the direct supervisor or, if this report relates to the actions committed by the direct supervisor, the senior manager;
- inform the compliance manager (in any form including compliance@mts.ru);
- fill in the “Unified Hotline” electronic form hotline-mts.ey.com on the official MTS website, the corporate portal or via Our MTS app (including anonymously);
- send a message to the “Unified Hotline” e-mail address: external.hotline.mts@ru.ey.com;
- call to an independent direct line 8 800 234 44 18.

Any person who violates the Code can be subject to disciplinary action, up to and including dismissal or termination of contract based upon contract terms and legislation.

6.2. PROHIBITION OF RETALIATION

MTS provides for an independent and comprehensive review of all communications and protects those who duly and in good faith report problems and concerns, facilitate investigations, and refuse to take part in activities that contravene the principles or requirements of the Code.

If you believe that retaliatory measures have been taken against you after you have notified about a problem or a violation, contact the compliance function (compliance@mts.ru).

7. SUMMARY

MTS strives to be an open and prudent company. It is impossible to describe all the ethical scenarios that we may face. Instead, we use good judgment, rely on commitment and personal responsibility of every person, in order to maintain high standards of ethics for ourselves and our company. We expect that all employees and directors of MTS, counterparties and any other participants in our work processes will be guided by both the letter and the spirit of this Code.

| Principles | Description |
|------------------------|---|
| #MoreThanAJob | I love what I do and do it to the fullest. I do not follow the formal limits of working hours, because the key indicator of my work is the result, but not the effort or time. |
| #ForTheCustomer | The main goal of my work is to solve my customer's problems and exceed his expectations. I respect the customer and do not cheat or manipulate him. |
| #FastInEssence | I save my colleagues' time and take care of them. I always give the context of the task, speak succinctly and objectively, deal with facts and reduce bureaucracy. I am looking for a solution, not an explanation of why it can not be done. If criticizing, I suggest. |
| #TakeAnAct | I start with myself and do not expect actions from others. I take responsibility and act. I track the result, think outside the functional framework and am responsible for the overall process. I solve problems and do not complain. If the problem is not in my area of responsibility, I do not ignore it but report it to my colleagues and help them. |
| #DoltCool | I am responsible for the quality of my work and do not create something average. I try new things, not afraid to take risks, and learn even through failures. I am honest with myself and can admit mistakes. |
| #Together | I contribute to building the MTS digital ecosystem, appreciate the diversity of business cultures, and believe that our strength increases greatly when we work together as a team. I am open to opinions and ideas of my colleagues, trust their competence, help them and share ideas and experience to achieve our common goal – to make people's lives be better every day. |