Dear Counterparty!

In order to minimize a risk of financial losses caused by unfair or unlawful actions of counterparties, injury to MTS PJSC goodwill and involvement of MTS PJSC in violation of the applicable anti-corruption law, the Company asks you to answer the questions below.

If you have your own answer option, please provide it in a free format (by adding lines, if any).

Should you have any questions regarding the completion and provision of the requested information, please refer to your contact person in MTS PJSC.

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| 1. **Is there any regulation in your company determining the anti-corruption policy, as well as a policy or other document regulating the management of a conflict of interest?**   ⃝ Yes ⃝ No  **If “Yes”**, please attach a relevant document or reference thereto. |
| 1. **Is there any complex corporate anti-corruption program in your company (anti-corruption compliance system/program)[[1]](#footnote-1)?**   ⃝ Yes ⃝ Yes, being implemented  ⃝ No, planned for implementation ⃝ No, implementation is not planned |
| 1. **Is there any special hotline (telephone number, email or other communication channel) in your company where employees, suppliers or other persons may report on corruption?**   ⃝ Yes ⃝ Yes, being implemented  ⃝ No, planned for implementation ⃝ No, implementation is not planned  **If “Yes”**, please specify this special line for reports on corruption:  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| 1. **Is anyone in your company designated as responsible for ensuring compliance with anti-corruption laws?**   ⃝ Yes ⃝ No  **If “Yes”**, please specify the contact details:  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| 1. **Has your company, any employees, managers or founders been held administratively / criminally liable for violating the anti-corruption laws, or been suspected of such a violation?**   (Any information known by your company for the recent 5 (five) years, confirmed by acts of the law-enforcement agencies, including official statements by their representatives, and information that was not the subject of consideration by such bodies or is under consideration).  ⃝ Yes (guilt is proved) ⃝ Yes (guilt was not proved)  ⃝ Yes (case in progress) ⃝ No  **If “Yes”**, please describe in brief the essence of the violation/accusation, provide a reference to the relevant information in public sources, as well as attach any documents or indicate any other information that you think may facilitate the most adequate assessment of the specified information:   |  | | --- | |  | |  | |  | |
| 1. **Is any of your company’s leaders, members of the governing bodies or participants[[2]](#footnote-2) a Public Official[[3]](#footnote-3)?**   ⃝ Yes ⃝ No |
| 1. **Does the government participate directly or indirectly (through other individuals/legal entities – “Public Official” or “Public Organization”[[4]](#footnote-4)) in your company (entity) or exercise control or influence a decision-making process in your company?**   ⃝ Yes ⃝ No  **If “Yes”**, please describe in brief the degree of influence, participation interest, name of such organizations, etc.:   |  | | --- | |  | |  | |  | |
| 1. **Will your company interact directly with any Public Official within the performance of its obligations to MTS PJSC?**   (For instance, for obtaining approvals, licenses, permits; registration of ownership; receipt of contracts; facilitation of decision-making or achievement of agreements, etc.)  ⃝ Yes ⃝ No  **If “Yes”**, please substantiate the need for (if it is not directly arising from an agreement to be concluded with MTS PJSC) and essence of such interaction:   |  | | --- | |  | |  | |  | |
| 1. **Are you going to engage contractors, intermediaries, other third parties or act as a third parties’ agent within the scope of its obligations to MTS PJSC?**   ⃝ Yes ⃝ No    ⃝ Yes, I will act as a third parties’ agent   * 1. **If “Yes”:**  1. **Please provide the name and TIN of such third parties and describe in brief the works/services to be performed/provided by these third parties within the scope of your obligations to MTS PJSC:**   \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_   1. **Will a third party interact directly with any Public Official when performing the assigned works (for example, for obtaining approvals, licenses, permits, registration of ownership, etc.)?**   ⃝ Yes ⃝ No   1. **Is a third party directly or indirectly (through other individuals/legal entities) affiliated with any Public Official (for instance, it was founded thereby, fully or partially belong thereto, under its control or recommended thereby)?**   ⃝ Yes ⃝ No |

Additional information (if any):

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(date) (signature) (full name, title)

**Confidentiality Statement:**

MTS PJSC will not make public or discuss the content, provide copies, publish or disclose in any format to third parties the information contained herein, without prior written consent of a counterparty, as well as will take all measures and apply all legal means to protect the information specified herein and prevent its unauthorized disclosure. The information received herein will be used by MTS PJSC only for compliance with the applicable legislation and support of procurements.

1. Also as it is stipulated by Article 13.3 of Federal Law No. 273-FZ “On Countering Corruption” dated 25 December 2008. [↑](#footnote-ref-1)
2. Participants/participation in the company (for the purpose of this Questionnaire) – founders, owners, shareholders, ultimate beneficiaries of your company. [↑](#footnote-ref-2)
3. Public Official (for the purpose of this Questionnaire) means any Russian or foreign, appointed or elected person, holding or filling any office in the legislative, executive, administrative or judicial body or international organization; any person performing any public function for the government, including for a government entity; political leaders, officials of political parties, including candidates for political posts, ambassadors, high-powered officials in nationalized industries or natural monopolies; leaders and employees of government institutions, including doctors, members of the armed forces, municipal officials, etc.; persons known to be related to a public official by family, friendship or business relations and (or) acting on behalf and (or) in favor of a public official. [↑](#footnote-ref-3)
4. Public Organization (for the purpose of this Questionnaire) means any public and administrative authority of Russia and foreign states, their constituent entities (including government ministries, services, agencies, institutions and their structural units) and local authority; any political party; all legal entities (Russian or foreign) directly or indirectly controlled by the government; legal entities the activities of which are perceived by the society as performing a public function for the government, except for fulfilling the requirements of the law; international public organizations. [↑](#footnote-ref-4)