



Anti-Bribery Statement

We at MegaFon are committed to applying the highest standard of ethical conduct and integrity in all our business activities.

The attached policy sets-out MegaFon's position on preventing and prohibiting bribery and corruption.

The success of our anti-bribery and anti-corruption measures depends on all employees, and those third parties acting for MegaFon, playing their part in helping to detect and eradicate bribery and corruption. Therefore, all employees and others acting for, or on behalf of, MegaFon are encouraged to report any suspected bribery or corruption in accordance with the procedures set out in the bribery policy. We will support any individuals who, in good faith, make such a report.

MegaFon does not tolerate, permit, or engage in bribery, corruption or improper payments of any kind in its business dealings anywhere in the world, whether with public officials or individuals in the private sector. We believe, that ethical behaviour is in the long-term interests of our Company.

MegaFon is committed to the following key anti-bribery and anti-corruption principles:

- We will carry out business fairly, honestly and openly.
- We will not give or offer any money, gift, hospitality or other advantage to any person acting in a business or public capacity, or to a third party associated with that person, to get them to do something improper.
- We will not give or offer any money, gift, hospitality or other advantages to any public official with the intention of influencing them to our business advantage.
- We will not use intermediaries or contractors for the purpose of committing acts of bribery.
- We do not allow employees to accept money, gifts, hospitality and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way.
- Any employee found to be in breach of these principles will face disciplinary action.
- No employee will suffer demotion, penalty or other adverse consequence for refusing to pay bribes, even if it may result in MegaFon losing business.
- We expect similar commitments to anti-corruption from all of our business partners.
- We are committed to a programme to counter the risk of MegaFon being involved in bribery. We will have adequate procedures in place to prevent bribery and to ensure that all employees understand them.
- We will have appropriate mechanisms in place to record any problems.
- We will encourage employees and others to report attempted or actual bribery or corruption of which they are aware, including with the introduction of an employee hotline and 'Speak Up' procedure.

Any concerns relating to a breach of the policy should be reported in one of the following ways:

- Your Line Manager
- Security Director
- Internal Audit Director
- CEO
- Hotline

Ivan Tavrín
CEO OJSC MegaFon