



Business Partner Code of Conduct

Policy Owner: Chief Financial Officer
Effective Date: 24 MAY 2023

This Business Partner Code of Conduct (the Code) establishes basic requirements and responsibilities for each Business Partner of KaR-Tel, LLP. KaR-Tel, LLP reserves the right to reasonably modify this Code from time to time.

I. Purpose, applicability and scope

KaR-Tel, LLP is committed to building a best-in-class supply chain and requires **Business Partners** (vendors, suppliers, agents, contractors, consultants, intermediaries, resellers, distributors, third party service providers) to reduce risk to our business by following all applicable laws, observing the highest ethical standards, and meeting or exceeding the requirements established in this Code.

We know that working sustainably, respecting human rights, and operating with the highest standards of ethical conduct and professional integrity improve long-term business performance. We are committed to these principles and require our Business Partners to share our commitment and to comply with this Code, which has been developed considering best practices in the information and communications technologies sector, the Electronic Industry Citizen Coalition Code of Conduct, the Joint Audit Cooperation Supply Chain Sustainability Guidelines, International Labor Organization conventions, and legal and regulatory requirements.

II. Minimum requirements and standards

Business Partner Code of Conduct	
Summary:	This Code sets the minimum standards and requirements that must be followed by Business Partners with respect to Local laws, regulations, rules, policies and Procedures.
Objectives	Establish best practices for Business Partners across the VEON Group, KaR-Tel, LLP and ensure compliance with applicable laws, regulations, policies and procedures.
Risks	<ul style="list-style-type: none">▪ Lack of awareness, knowledge and enforcement of this Code.▪ Engagement in improper business practices▪ Reputational, financial or criminal liability associated with engaging a business partner.
Controls	<ul style="list-style-type: none">▪ Due diligence when selecting Business Partners.▪ Recurring mandatory (online and offline) training on the Code▪ G&H review, approval and registration process.▪ COI disclosure by Business Partners.▪ Ongoing monitoring and controls review.
Minimum requirements and standards	For detailed requirements refer below to topics from 1- 19



1. Compliance with Law

KaR-Tel, LLP complies with applicable laws and requires its Business Partners to do the same, including anti-bribery laws of the United States, where VEON is listed on the Nasdaq, and of the Netherlands, where VEON is headquartered and also is listed. Neither KaR-Tel, LLP nor our Business Partners will undertake any activity or accept any risk that would result in unethical outcomes or a violation of applicable laws.

Where the applicable laws and this Code address the same subject and are not in conflict, the highest standard will apply. Should any Code requirement conflict with applicable laws, the highest standard consistent with applicable local laws will apply.

2. Bribery and Corruption

KaR-Tel, LLP will not tolerate any form of corruption or bribery and strictly prohibits kickbacks, fraud, theft, extortion, and embezzlement of any kind. Each KaR-Tel, LLP Business Partner must comply with all applicable anti-bribery laws and maintain accurate books and records that correctly reflect their transactions and contain no false or misleading information. Neither money nor anything of value may be given, offered, requested, promised, or accepted by any Business Partner, directly or indirectly through another party, to gain an improper advantage to KaR-Tel, LLP or related to KaR-Tel, LLP.

Business Partners are expected to maintain their own anti-bribery compliance program to prevent and deter wrongdoing or possible violations of law within their own businesses.

3. Gifts and Hospitality

Business Partners will not, directly or indirectly, offer gifts, hospitality, or other benefits to KaR-Tel, LLP employees or representatives with the intent to improperly influence them and will not offer to KaR-Tel, LLP employees any gifts or hospitality, regardless of amount, during contract negotiation, bidding, tender, or award.

4. Ethical Conduct

Ethical conduct requires that we do what is right, not just follow the law. VEON operates on ethical principles and expects its Business Partners to operate likewise—with us and in any way related to our business. Simply stated: integrity and honesty matter.

The specific requirements set out in the Code are the minimum standards for our Business Partners. We encourage our Business Partners to go beyond these standards, particularly where local laws and regulations are either weak or seldom enforced.

A Business Partner that fails to adhere to the standards of this Code may not be viewed favorably when awarding further work and may be terminated from some or all business relations.

5. Due Diligence Process

KaR-Tel, LLP conducts appropriate, risk-based due diligence when selecting Business Partners. Business Partners must undergo and successfully complete anti-bribery due diligence prior to engagement and are required to cooperate with KaR-Tel, LLP's due diligence process. Business Partners must accurately complete all questionnaires provide requested documentation and transparently disclose information related to ownership and affiliated parties.

6. Confidentiality and Data Security

Business Partners will

- keep confidential any information relating to KaR-Tel, LLP customers, business activities, contracts, projects, financial situation, or performance unless specific written permission is obtained from KaR-Tel, LLP;
- protect the reasonable privacy expectations of persons with whom they do business;
- comply with privacy and information security laws and regulatory requirements when personal information is collected, processed, and transmitted;
- ensure customer data is kept secure and customer privacy is not breached;
- maintain appropriate data security and data security systems; and
- supervise appropriately their employees who interact KaR-Tel, LLP's data and customer data.

7. Anti-competitive Behavior

Business Partners will not violate or conspire to be part of any violation of competition laws or anti-trust regulations. Business Partners will uphold fair business, advertising, and competition standards.

8. Conflicts of Interest

A "conflict of interest" occurs when a personal interest of a Business Partner (or someone closely related to a Business Partner) conflicts with an interest of the KaR-Tel, LLP. Conflicts of interest can be actual (the conflict exists), potential (a situation exists or is foreseeable in which a Conflict of Interest might arise), or apparent (there is no actual conflict, but a reasonable observer might believe one exists). Business Partners should avoid conflicts of interest that may affect KaR-Tel, LLP's business relationship. When a conflict of interest cannot be avoided, the Business Partner must report it to the KaR-Tel, LLP's Ethics & Compliance Service.

9. Intellectual Property

Business Partners will respect KaR-Tel, LLP's intellectual property rights and will transfer technology in a manner that protects intellectual property rights.

10. Money Laundering

Business Partners will firmly oppose all forms of money laundering and take steps to prevent financial transactions from being used to launder money.

11. Prohibition on Oral Contracts

KaR-Tel, LLP prohibits oral contracts with Business Partners. Prior to commencing work, KaR-Tel, LLP and its Business Partners must agree in writing to terms and conditions of each transaction or engagement.

12. International Trade and Economic Sanctions

Business Partners will abide by applicable international trade (including import and export/reexport controls) and economic sanctions laws and regulations. Business Partners will not do business with parties or in jurisdictions where applicable laws or regulations prohibit it.

13. Human and Labor Rights

Business Partners will respect and promote universal human rights as stated in the United Nations' Universal Declaration of Human Rights. Business Partners will

- treat people with dignity and respect, without mental or physical cruelty or any form of harassment or intimidation;
- not use any form of forced labor, debt bondage, or involuntary or compulsory labor;
- not require employees to surrender any government-issued identification, passports, or work permits as a condition of employment;
- ensure the work relationship between the worker and Business Partners is freely chosen and free from threats, intimidation, or coercion;
- not use child labour¹;
- promote open and honest engagement between employees and management without fear of retaliation or reprisal and recognize, as far as legally possible, the right of free association of employees
- refrain from acquiring any products or services that-- within the supply chain-- involve human trafficking or slavery or human rights violations.

14. Non-discrimination

In hiring or employment practices, Business Partners will not negatively discriminate against any legally protected class, for instance, on the basis of age, race, color, ethnicity, indigenous status, nationality, gender, gender identity or expression, sexual orientation, disability, pregnancy, medical condition, religion, social origin or status, political affiliation, trade or union membership, or marital or veteran status.

15. Employment Conditions

Business Partners clearly and fairly will define the terms and conditions of staff employment and provide fair remuneration at the applicable national statutory minimum wage and comply with the maximum number of working hours, following applicable laws.

16. Health and Safety

Business Partners will provide on its premises a healthy and safe working environment following international best practices and applicable law and regulation, including sanitation and hygiene facilities for workers. All work-related fatalities and incidents resulting in near fatal injury that occur on KaR-Tel, LLP premises or in relation to activities being carried out specifically for KaR-Tel, LLP must be reported.

17. Accident and Emergency Readiness

Business Partners will prepare for and respond to accidents, health problems, and foreseeable emergencies. Business Partners will also record, investigate, and learn from past accidents and emergencies.

18. Environment and Pollution Prevention

Business Partners will act in accordance with applicable standards regarding environmental protection and will adhere to applicable environmental laws to ensure responsible practices. In countries where legislation is less developed or unenforced, Business Partners will strive to minimize environmental impact. Innovative developments in products and services that offer environmental and social benefits and the use of environmentally friendly technologies should be supported. Business Partners will work to remedy any activity that adversely affects human life, wildlife, and the environment.

19. Annual Corporate Responsibility

VEON reserves the right to report publicly on the implementation of this Code through its annual Corporate Responsibility Report. Reporting will not identify individual Business Partners, and any case studies will be anonymized so that the identities of Business Partners cannot be determined unless previously agreed upon.

III. Where to go for help

If you believe that someone may have violated this Code, please contact KaR-Tel, LLP's Ethics & Compliance Service at compliance@veon.com, or submit a report about the violation at www.veon.com/speakup. For more information about reporting violations please refer to the Speak Up: Raising Concerns and Non-Retaliation Policy. KaR-Tel, LLP and VEON do not tolerate any form of retaliation, harassment, or intimidation of any person who has reported an alleged violation in good faith.

KaR-Tel, LLP and/or VEON will investigate the alleged misconduct in relation to this Code in accordance with the KaR-Tel, LLP's Investigations Management Policy and Investigations Procedures. Any member of the KaR-Tel, LLP Personnel who violates this Code may be subject to disciplinary measures, up to and including termination of employment.