

CODE OF CONDUCT

2022



Our industry is at the center of lives and livelihoods: We provide services for 1440 minutes in a day in our customers' lives, we support businesses as they transform into value creators of the digital era, and we help national economies achieve sustainable, long-term economic growth. With this great footprint comes great responsibility.

At VEON, we are going through an exciting period of transformation: We are transforming the economies of the markets where we operate with a new, dynamic approach to what our business means. As Digital Operators, our operating companies are developing new businesses and this requires greater agility. We have high ambitions for growth. We find ourselves facing unforeseen macro-level challenges and unpredictable developments, as well as operating within a culturally diverse environment.

Through all of this, we are fully committed to value protection as well as value creation. As a company, we have an impeccable track record of focusing on the highest standards of governance and ethical conduct. We have to protect these high standards, which should be our compass through times of change and challenges. These high standards are summarized in our Code of Conduct.



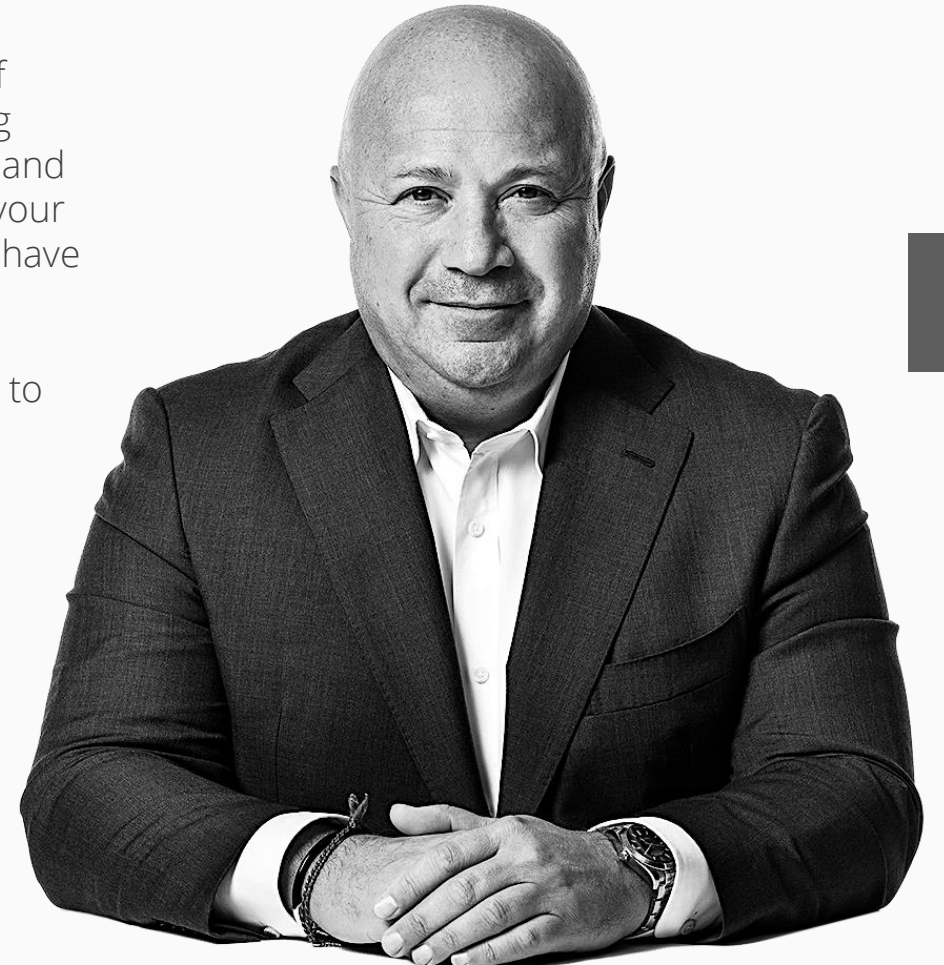
I count on each one of you to take this Code of Conduct to heart, with the same enthusiasm with which we embrace our growth targets. It is very clearly linked to our values: Being truthful, collaborative, customer-obsessed, innovative, and entrepreneurial. While progressing towards our goals in line with these values, each one of us needs to keep integrity, honesty, and accountability at the center of our actions.

To support us in the application of this Code of Conduct, there is a wide range of resources available to the VEON family: Our policies and procedures, our training programs, and the expertise of our colleagues in Ethics and Compliance, People and other support teams are among these resources. Please benefit from these for your and your teams' development, and in order to understand the requirements we have for third parties who work for VEON Group companies.

Please also note that we have well-established and institutionalized mechanisms to ensure accountability. If you are concerned about the conduct of a teammate or a counterpart, please explore the full range of channels to address this concern, including the "Speak Up" channels available to you.

Thank you for your support in protecting the value of our brands and companies, and for making VEON a fair, welcoming environment for all our employees.

Kaan Terzioğlu
CEO



VEON and its
people must
always act
**respectfully,
ethically and
with
integrity.**



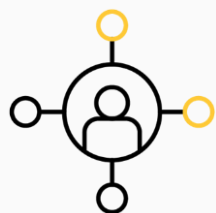
INTRODUCTION

OUR STRENGTH IS OUR PEOPLE

This Code of Conduct (“Code”) sets forth the framework and principles in key areas, including our zero tolerance for bribery or corruption, to help us achieve this together and drive our values.

The Chief Executive Officer is the ultimate owner of the Code, with delegated authority to the Chief Internal Audit & Compliance Officer, Chief People Officer, and Group General Counsel to interpret and enforce the Code.

OUR VALUES



customer-obsessed:

listen, learn and grow



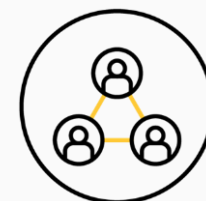
entrepreneurial:

agility to seize opportunities and turn possibilities into new realities



innovative:

relentless pursuit of the next ultimate customer experience



collaborative:

work as a team, learn from failures to create value with success



truthful:

firmly uphold integrity and the highest ethical standards

TO WHOM DOES THIS CODE APPLY?



This Code applies to all employees (including temporary employees and contractors), directors, officers and board members at VEON. For purposes of this Code of Conduct, “VEON” refers to VEON Ltd., the ultimate group parent company, as well as each of its majority-owned or controlled subsidiaries, joint ventures or other entities under its control. We also expect all people with whom we engage, including agents, representatives, intermediaries or other third parties authorized to act for or on behalf of VEON, as well as joint ventures where VEON does not have a controlling interest, to respect and abide by comparable standards of conduct.

WHEN IT COMES TO...

- 01** Our People
- 02** Dealing with Others
- 03** Dealing with Governments and Public Officials
- 04** Communications, Information Sharing and Privacy
- 05** Protecting VEON Assets
- 06** Using This Code

Our strength is our people. **We respect the rights and dignity of everyone and believe that diversity is part of our competitive advantage.** VEON maintains, at all times, an environment of respect, mutual trust, collaboration and open communication.

DIVERSITY AND INCLUSION

HARASSMENT / Examples

HEALTHY AND SAFE WORK / Examples

PERSONAL RELATIONSHIPS



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DIVERSITY AND INCLUSION

VEON promotes diversity, respect, inclusivity and equal employment opportunities for all.

We foster environments that are safe and professional and do not tolerate any form of abuse or harassment.

We follow all applicable employment laws wherever we operate and make sure our decisions regarding recruitment, selection, development and advancement are based on merit, qualifications, skills, achievements and potential.

We respect fundamental human rights and do not allow factors such as race, religion, gender, age, national origin, sexual orientation, marital status or disability to influence our judgement.

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HARASSMENT

VEON does not tolerate any inappropriate conduct or behavior that is humiliating, intimidating or hostile or that unreasonably interferes with work performance.

We expect our people to treat others with respect and avoid situations that may be perceived as inappropriate. For examples, VEON prohibits conduct such as:

- offensive or abusive language;
- sexually explicit or derogatory comments or images;
- unwelcome sexual advances;
- lewd or offensive gestures or jokes;
- intimidating or threatening behavior;
- dangerous, abusive or violent behavior or the threat of such behavior.

You may always contact the People & Organization or use the Ethics & Compliance [SpeakUp Line](#) to report a concern.

EXAMPLES:

Maybe we'll move to another place for coffee this evening?

Hm... I already have plans to spend time with my dog...

My boss sometimes acts in a way that makes me feel uncomfortable - asking me out for drinks...

✗

You look great today. We'd be a very attractive couple...

Umm... I just slept enough...

...or striking up conversations about having affairs when nobody else is around.

✗

What should I do?

Say directly?

Call SpeakUp line?

Quit the job

Put up with it

✗

If your boss's behavior is unwanted, the best solution is to first openly tell your boss this. It may be that your boss is unaware that this behavior disturbs you.

Please stop! I do not like the way you behave with me. I feel uncomfortable.

I'm so sorry! I was inattentive

✗

However, if discussing with your boss does not help or if you don't feel comfortable discussing this with your boss directly...

✗

You called SpeakUp line. How can I help you?

...you may raise the issue with the People & Organization or you may use the Compliance SpeakUp Line.

✓

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HEALTHY AND SAFE WORK

VEON provides a safe and secure workplace and builds awareness of potential safety risks and how they should be managed. We avoid unsafe actions and help ensure our own safety and the safety of others. For more information, see the HR Policy and Health & Safety Guidelines.

We strictly prohibit the sale, possession, distribution or use of illegal substances and the misuse of prescription medications in our workplaces. You may not work while under the influence of drugs, alcohol or other substances in a manner that impairs your ability to perform safely and effectively or in a manner that would cause embarrassment or harm to VEON.

Should you find yourself in a situation where you have a safety concern or feel that you, or a colleague, needs assistance, reach out to your line-manager or your local People & Organization. We are here to help and support you, and we respect privacy.

We follow local environmental legislation and strive to reduce environmental and health impacts of our operations through responsible use of natural resources and reducing waste and emissions.

EXAMPLES:

What can it mean to "maintain an atmosphere of respect, mutual trust, collaboration and open communication"?

Above all, treat others as you want yourself to be treated. This goes beyond the rules of the Code and the law.

✓

Don't take credit for someone else's work.

✗

Don't record conversations and meetings without informing people (this can be illegal in some countries, and is always a breach of trust).

✗

Do not disclose confidences.

My company has grand plans for the next year. Do you want to listen?

✗

Respect personal time.

22:13

You should go home now. Comments will wait you tomorrow.

✓

Encourage opinions, including different views and ideas.

Mobiles for cats!

Telecom of Future

You can call into the future!

Call directly to your head!

Auto translation of calls!

✓

Listen!

Hello! You called SpeakUp line. How can I help you?

✓

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Consistent with its respect for privacy, **VEON normally does not take an interest in personal relationships, so long as those relationships do not adversely affect job performance or the reputation or business interests of VEON.**

Romantic relationships with co-workers can be complex and may be misunderstood, so if you find yourself in a romantic relationship with a co-worker, avoid issues by seeking guidance from your line manager or People & Organization. Being transparent and truthful is critical; make proper disclosures and seek advice.

WHEN IT COMES TO **DEALING WITH OTHERS**



In our dealing with others – whether partners, suppliers, customers or others – VEON applies the same high standards of respect, ethics and integrity. Our conduct can reflect on and impact our reputation and our organization; VEON continuously strives to maintain a position as a responsible, ethical and positive member of our community and our industry. You should always keep this in mind in your actions, behaviors and speech.

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COMPLIANCE WITH ANTI-CORRUPTION LAWS

VEON abides by all applicable Anti-Bribery and Corruption laws. VEON has zero tolerance for any form of bribery or corruption, in any setting, directly or by anyone doing business on VEON's behalf. We expect the same zero tolerance from everyone who works for or with us. No employee or third party acting on behalf of VEON may corruptly offer, promise, grant or authorize the giving of money or anything else of value to anyone, directly or indirectly, in connection with business dealings in order to obtain or retain business or to secure any advantage for VEON. No one will be demoted, penalized or suffer other adverse consequences for refusing to pay a bribe, even if that refusal may result in a lost business opportunity. For more information, see the Anti-Bribery and Corruption Policy.

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GIFTS AND HOSPITALITY

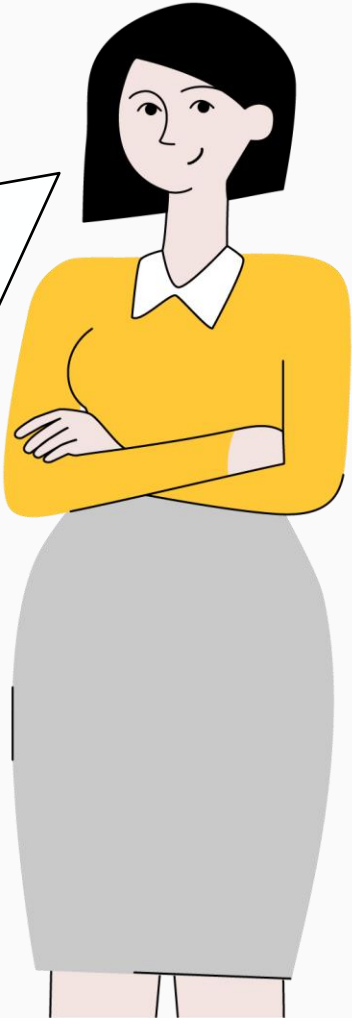
Giving or receiving modest gifts and hospitality (like a coffee or branded pen) is often normal and polite. But some gifts and hospitality, particularly those that are lavish or disproportionate, may result in improper influence and may be viewed as bribes. **Improper gifts and hospitality can harm VEON's reputation and may subject VEON to fines, penalties or other punishment.**

We do not offer gifts or hospitality when the recipient's business rules or laws prohibit their acceptance. Stricter rules apply in dealing with public officials, governments, government agencies or government-owned or -controlled businesses. For more information on handling gifts and hospitality, see the specific rules and examples provided in the Anti-Bribery and Corruption Policy.

EXAMPLES:



It may be permissible to support visits of our business partners. It also may be permissible to arrange an evening's entertainment. However, arrangements must be reasonable (first class is not), necessary (spousal travel is not), and appropriate (cash stipends are not). In addition, you must obtain approval in advance by following the Anti-Bribery and Corruption Policy.



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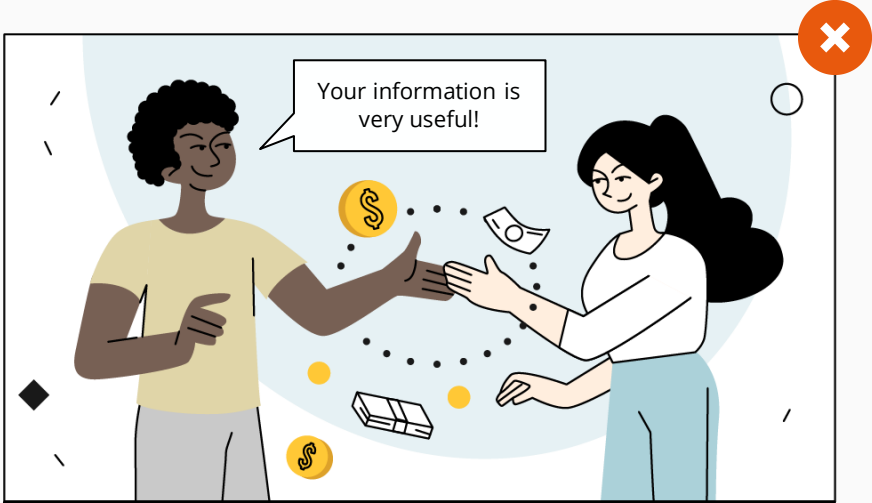
COMMITMENT TO FAIR DEALING

We deal fairly with our customers, business partners and competitors. We do not take unfair advantage of anyone through any misrepresentation, manipulation, concealment, misuse of confidential information, fraud or other unfair business practice. We are truthful in our business dealings, treat our customers, competitors and business partners fairly and respect their rights.

VEON complies with applicable competition laws (also known as antitrust or antimonopoly laws). Competition laws across the world prohibit anti-competitive agreements, abuses of dominance and certain other practices. Collusion, and agreements or discussions that give rise to competition concerns, such as price-fixing, market sharing and bid rigging, are always improper and can never be justified. You should never participate in these types of agreements or discussions, as they could result in legal liability and potentially large penalties. If you have any concerns or questions, contact your Legal or Ethics & Compliance.

VEON respects intellectual property rights. We use only those items, including printed materials, videos, computer software, music, artwork, photographs and other intellectual property that we have created ourselves or obtained legally from authorized parties.

EXAMPLES:



Your information is very useful!

I have established good relations with the finance officers of one of our competitors. They have access to financial results, pricing, trends and customer deals. Is it appropriate to unofficially exchange this type of information with them from time to time?

This illustration shows two people standing and talking. The person on the left is saying, "Your information is very useful!". The person on the right is handing over a stack of money. There are several dollar signs and banknotes floating around them. A red circle with a white 'X' is in the top right corner of the illustration area.

No. Exchanging competitive information is prohibited and could result in a legal violation. You must refuse to discuss financial results, pricing, trends and customer deals with competitors.



I don't want to talk about work. How are you? How is your family doing?

This illustration shows two people sitting at a table with coffee. The person on the left is saying, "I don't want to talk about work. How are you? How is your family doing?". A green circle with a white checkmark is in the bottom left corner of the illustration area.



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PREVENTING MONEY LAUNDERING AND RELATED ACTIVITIES

VEON does not tolerate any form of money laundering or terrorist financing. Money laundering is when individuals or entities try to make funds raised from criminal activity look legitimate.

To prevent VEON products or services from being used to further money laundering or terrorist financing, you must know the anti-money laundering and terrorist financing requirements applicable in your location and follow all procedures and instructions from your Anti-Money Laundering Officer, Legal and Ethics & Compliance. You must follow appropriate due diligence procedures to understand the business and background of prospective business partners and to determine the origin and destination of funds. You must report any suspicious transactions or incidents to your Anti-Money Laundering Officer.

For more information, see the Anti-Money Laundering and Counter Terrorist Financing Policy.

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We form relationships with reputable, competent business partners that will comply with the Business Partner Code of Conduct. To protect VEON from corruption and other significant risks, we ensure that appropriate due diligence is undertaken before engaging business partners. For more information, see the Third Party Risk Management Policy.

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We are responsible members of and promote the sustainable growth in the communities in which we operate by making social investments and charitable donations in line with our Corporate Citizenship Strategy. We do not make donations of any type, either in cash or in kind, to political parties, organizations, factions or movements of public or private nature, whose activity is clearly linked with political or religious activities. In adherence with the principles of transparency we publish our corporate citizenship strategy, performance and programs in our annual sustainability report.

VEON is committed to the elimination of all forms of forced and compulsory labor and to the effective abolition of child labor.

For more information, see the Anti-Bribery & Corruption Policy.

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In procuring goods and services for VEON, **we make decisions based on merit, avoid conflicts of interest, improper gifts and entertainment (especially during a pending tender process) or any other kind of favoritism** and follow guidance from your Procurement. We do business only with suppliers and vendors that comply with legal requirements and act in a manner consistent with VEON's commitment to compliance and ethics as outlined in the VEON Business Partner Code of Conduct.

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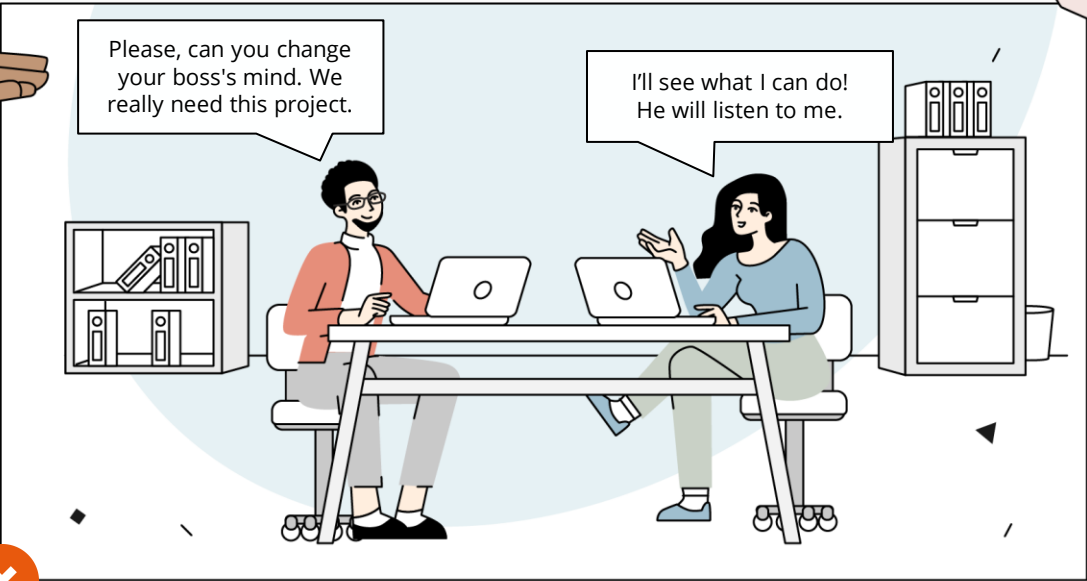
You must avoid situations where personal (including family members') interests and relationships conflict, or may appear to conflict, with your professional duties or the interests of VEON. For more information, see the Conflict of Interest Policy.

You should not use your position at VEON to advance your personal interests or those of a friend or relative at the expense of VEON's interests. Following local procedures, you should disclose close personal relationships with any supplier, dealer or business partner with whom VEON does business, or any government official with a connection to VEON. You must not let personal interests or relationships unfairly or improperly affect decisions on hiring, selecting or dealing with government officials, suppliers, dealers or business partners on behalf of VEON.

EXAMPLES:



My spouse is an officer in a company that provides services to VEON, and I also have contacts with them from time to time. Is that a problem?



Please, can you change your boss's mind. We really need this project.

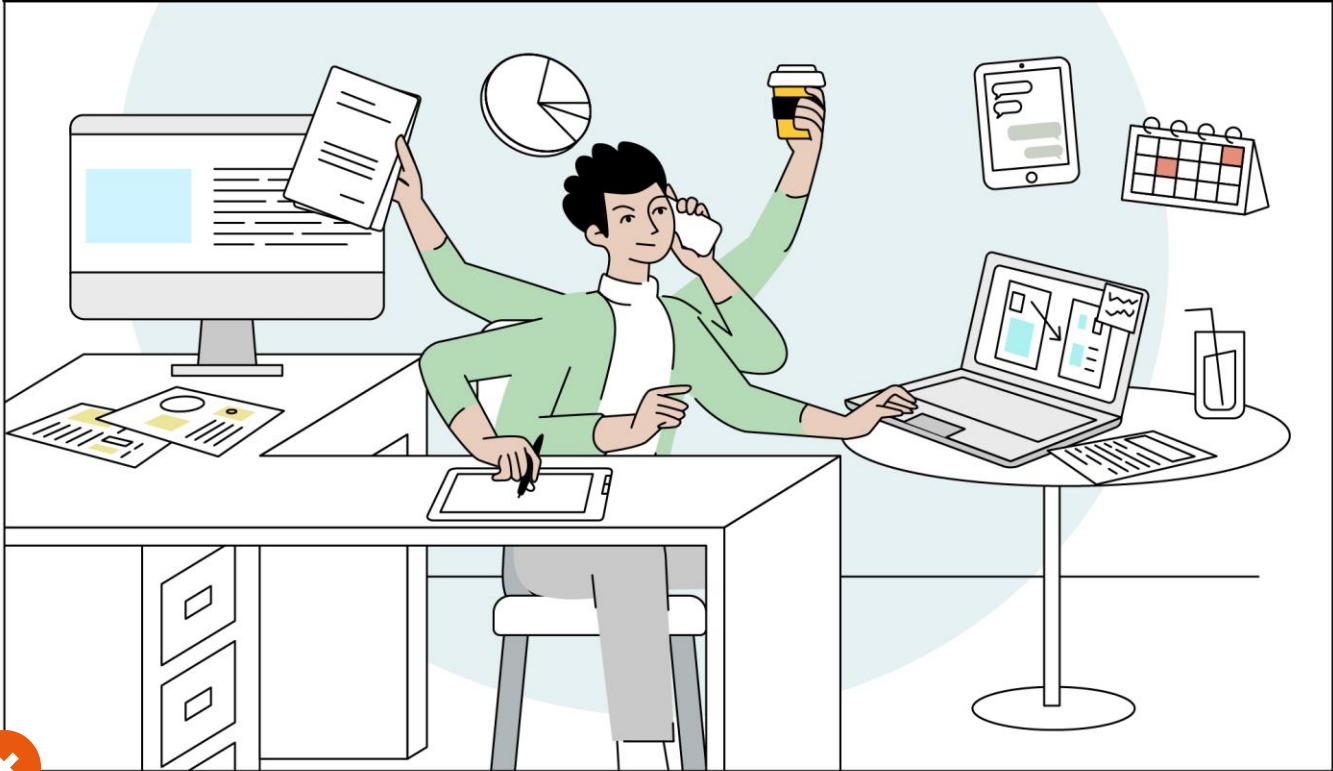
I'll see what I can do! He will listen to me.

It is important that all actual or potential conflicts of interest be disclosed so that any issues can be anticipated and avoided. Your situation presents a potential conflict of interest and must be disclosed according to the Conflicts of Interest Policy.



EXAMPLES:

A content provider with whom VEON is doing business has offered me some consultancy work for the design of web content. At VEON I am responsible for working with content providers and know the requirements for web content, and I could do this work better than anyone else. I am going to do it on weekends and in the evenings on my personal computer. May I accept this job offer?



No, because you are responsible for the work with these type of business partners at VEON. This is a clear situation of a conflict of interest.



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As we innovate and serve our customers, **VEON complies with all applicable sanctions, export, import and trade controls.** When engaging vendors or entering commercial relationships, or moving goods, technologies or services across international borders (whether physical movements or digital ones), you must know what sanctions or trade rules apply and follow them. For more information, see the Sanctions and Export Controls Policy.

WHEN IT COMES TO **DEALING WITH GOVERNMENTS AND PUBLIC OFFICIALS**

VEON is committed to dealing openly and honestly with governments and public officials and avoiding corruption in any form. VEON prohibits facilitation payments (i.e., non-legal payments to expedite routine government actions). We observe strict limitations when paying for or reimbursing public officials' travel or hospitality expenses, e.g., airfares, meals (other than modest refreshments) or hotel bills, gifts of greater than nominal value or charitable contributions on their behalf or for their benefit. For more information, see Government Relations Policy and Anti-Bribery & Corruption Policy.

Examples



EXAMPLES:

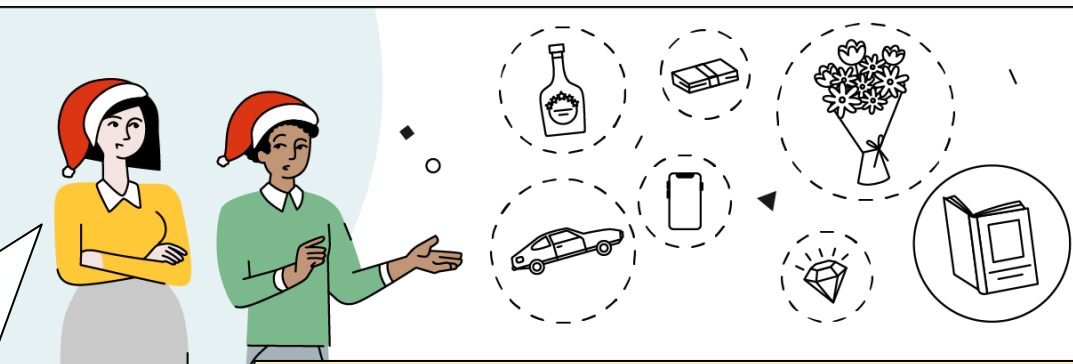


It is common in my country to give Christmas presents to some low-level government officials, such as a bottle of wine.



We do not ask them to do anything illegal for VEON or give us any preferences. May we give these gifts?

You must seek prior approval from the Compliance Officer for a gift exceeding the allowed value by following the Anti-Bribery and Corruption Policy.



Use a good judgment to determine if the gift is appropriate and consider: "Will the value or type of gift create an embarrassing situation for VEON, myself or the person who would receive the gift?"

A bottle of wine can be expensive enough to raise doubts and may be culturally inappropriate, as well.

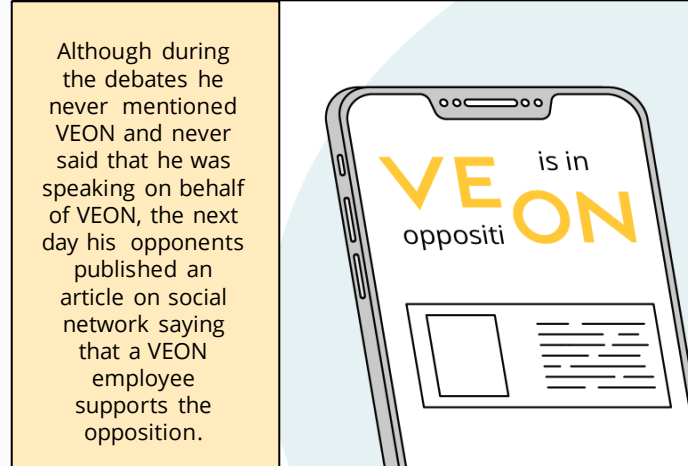



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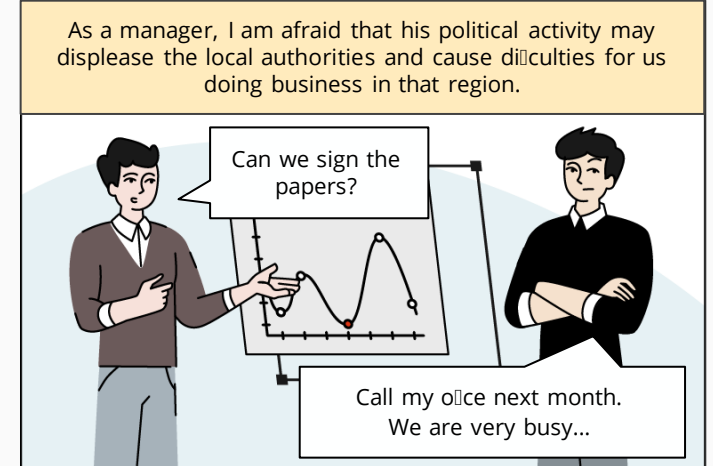
An employee I supervise supports an opposition political party. He recently participated in political debates on local TV.



Although during the debates he never mentioned VEON and never said that he was speaking on behalf of VEON, the next day his opponents published an article on social network saying that a VEON employee supports the opposition.

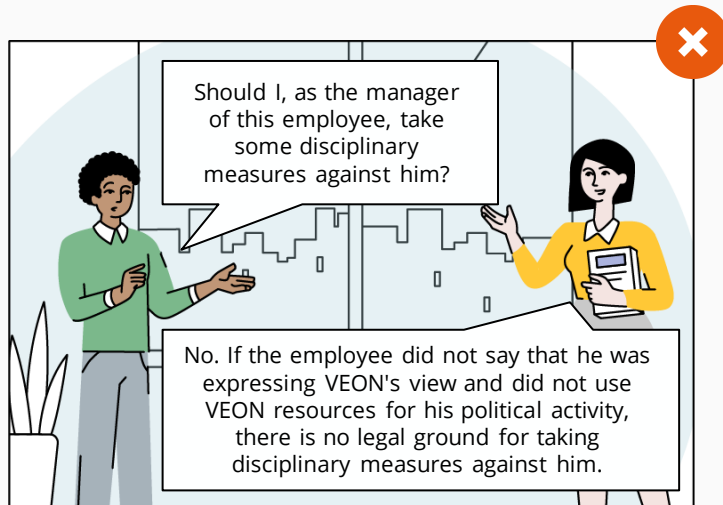


As a manager, I am afraid that his political activity may displease the local authorities and cause difficulties for us doing business in that region.



Should I, as the manager of this employee, take some disciplinary measures against him?

No. If the employee did not say that he was expressing VEON's view and did not use VEON resources for his political activity, there is no legal ground for taking disciplinary measures against him.

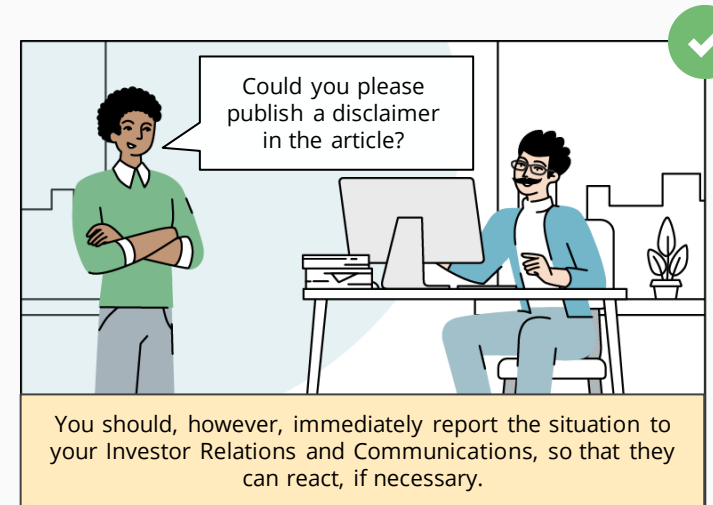


Our employees are free to express their own views and to participate in legitimate political activities.



Could you please publish a disclaimer in the article?

You should, however, immediately report the situation to your Investor Relations and Communications, so that they can react, if necessary.



WHEN IT COMES TO **COMMUNICATIONS, INFORMATION SHARING AND PRIVACY**

How we present VEON publicly is essential and often presents complex considerations.

Only designated persons may discuss VEON with the news media, financial analysts and investors. All external inquiries regarding financial, strategic or other business information about VEON, or any of its business units or operations, must be referred to the Investor Relations.

You must be careful in your use of social media, especially when mentioning work or work-related matters.

You must protect privacy and not mention any specific VEON business partners, colleagues, shareholders or other stakeholders without their permission or disclose VEON confidential or proprietary information.

For more information on handling external inquiries or using social media, see **the External Communications Policy**.

ENSURING ACCURACY OF VEON INFORMATION

SHARING VEON INFORMATION / Examples

PRIVACY AND PERSONAL INFORMATION / Examples

INSIDER TRADING / Examples



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ENSURING ACCURACY OF VEON INFORMATION

SHARING VEON INFORMATION / Examples

PRIVACY AND PERSONAL INFORMATION / Examples

INSIDER TRADING / Examples

ENSURING ACCURACY OF VEON INFORMATION

All information you record or report on VEON's behalf must be accurate and complete. All records, including accounts and financial statements, must be timely, maintained in appropriate detail and accurately reflect transactions. For more information, see the Accounting Policy (Manual).

You must follow all legal requirements and VEON internal procedures for reporting information. You are expected to ensure that no undisclosed or unrecorded agreement, account, fund or asset is established or maintained. You must ensure that all commitments or commercial arrangements on behalf of VEON are in writing and contain the entirety of the material terms representing the understanding or agreement between the parties.

You are expected to cooperate fully with internal and external auditors and provide them with accurate information. Concealing information from management or from internal or external auditors can cause serious damage to the financial integrity of VEON and is strictly prohibited.

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ENSURING ACCURACY OF VEON INFORMATION

SHARING VEON INFORMATION / Examples

PRIVACY AND PERSONAL INFORMATION / Examples

INSIDER TRADING / Examples

VEON INFORMATION

You must seek advice and follow instructions from the Legal department before sharing confidential information outside of VEON. On occasion, we may need to share confidential information with persons outside of VEON so that a business partner (e.g., a service provider or an external auditor) can work effectively with us. We use non-disclosure or confidentiality agreements to protect the information that we share.

EXAMPLES:

What are some examples of material non-public information?

Material non-public may include: any information about financial results and significant changes in financial results and/or financial condition and financial projections; major new contracts, licenses, subscribers, products, services, suppliers or finance source or the loss thereof; significant acquisitions or dispositions of assets; significant actions by regulatory authorities that relate to our operations.

Code of Conduct

CONTRACT

The illustration features a man on the left in a green sweater and a woman on the right in a yellow sweater holding a 'Code of Conduct' book. The background is filled with various financial and legal icons: a candlestick chart, a contract document, a pie chart, a line graph, a bar chart, a stack of cash, a document with a checkmark, and several dollar signs. A central text box provides a definition of material non-public information.

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ENSURING ACCURACY OF VEON INFORMATION

SHARING VEON INFORMATION / Examples

PRIVACY AND PERSONAL INFORMATION / Examples

INSIDER TRADING / Examples

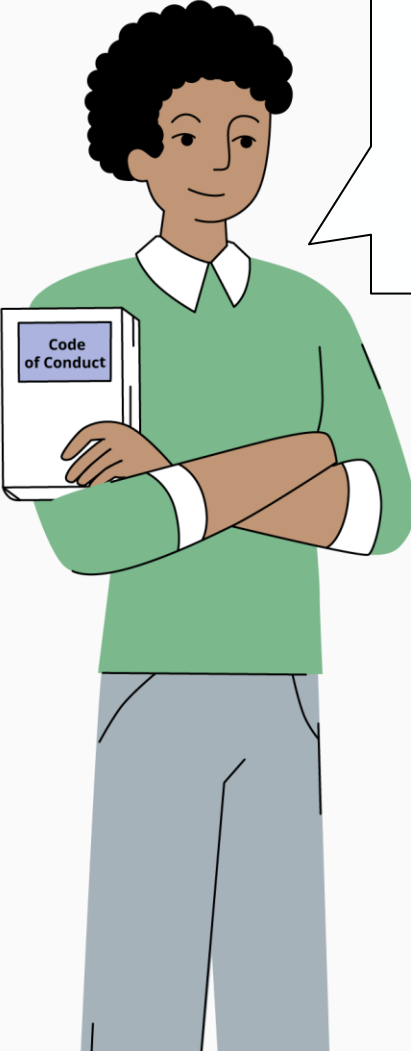
PRIVACY AND PERSONAL INFORMATION

We ensure the privacy of our customers' personal data and communications. Our customers and other third parties trust us with their personal information, and we value this trust. We follow applicable regulations governing information security and keep confidential information safe from loss, theft or accidental disclosure. You may not access, view, use, modify, share or distribute customer information without a valid business reason and without proper authorization.

VEON is committed to respecting the confidentiality of your personal information. We will only acquire and retain personal data that is required for the effective operation of VEON or required by law. Access to personal records is limited to authorized persons who have a clear business need for that information. Your personal information will not be provided to anyone outside of VEON without a valid legal basis and only by means that ensure adequate protection.

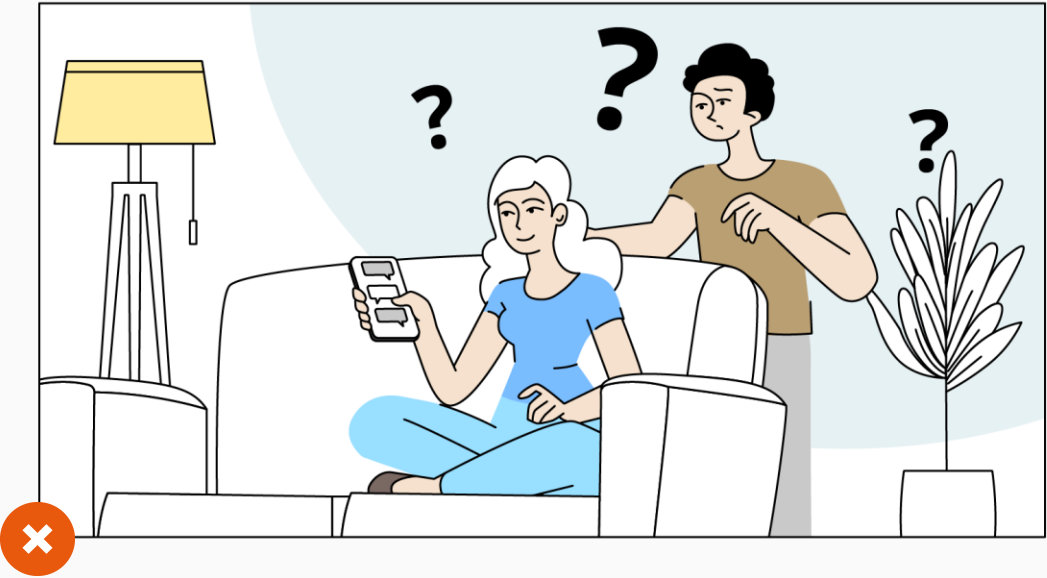
For more information, see the Privacy Policy.

EXAMPLES:



My friend who works in the same department as me has asked me if I could provide him with information about the traffic on his wife's phone. He thinks that her telephone bills are too high. My friend does not have access to the customers database and cannot get this information himself. Should I help him?

No. We may provide the personal information only to the customer or his/her representative acting under a power of attorney. We must not disclose this information to anyone else, including our friends and co-workers.



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ENSURING ACCURACY OF VEON INFORMATION

SHARING VEON INFORMATION / Examples

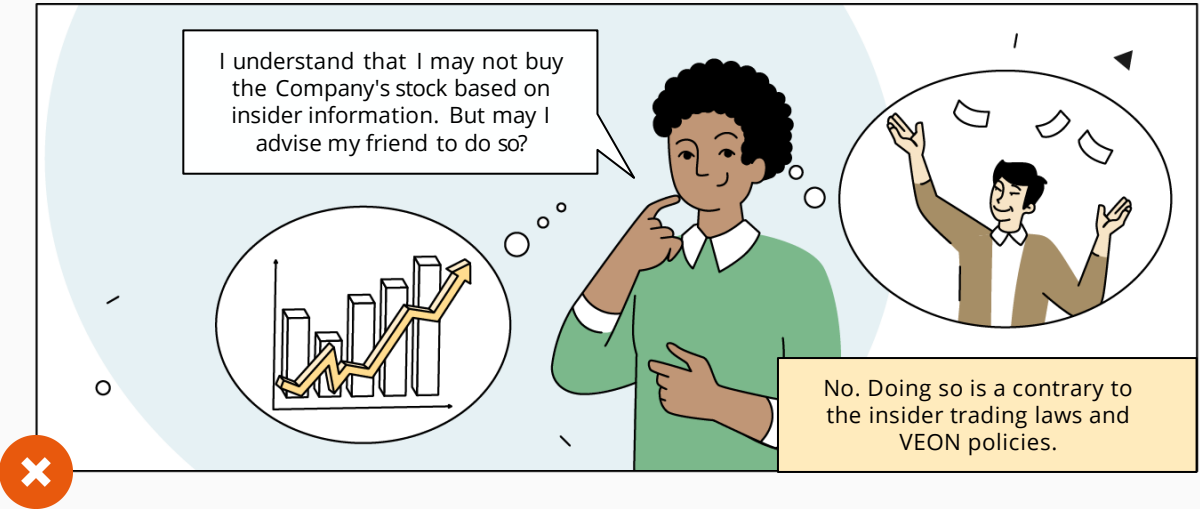
PRIVACY AND PERSONAL INFORMATION / Examples

INSIDER TRADING / Examples

INSIDER TRADING

You, members of your household, and any other person or entity whose transactions are directed by you or are subject to your influence or control may not trade in securities of any kind using non-public information disclosed or provided by you. As set out in the Insider Trading Policy, window periods for trading VEON securities may be opened from time to time by the Group General Counsel. Trades in VEON securities within window periods must be pre-cleared by the Group General Counsel.

EXAMPLES:



WHEN IT COMES TO **PROTECTING VEON ASSETS**

We have a duty to VEON and its shareholders to protect and **make the best use of VEON assets, resources and property, including VEON intellectual property.**

AVOIDING WASTE OR MISUSE OF VEON ASSETS

PROTECTING VEON ASSETS FROM FRAUD
OR THEFT / Examples

PROTECTING INTELLECTUAL PROPERTY

PROTECTING VEON INFORMATION
TECHNOLOGY SYSTEMS / Examples

ENSURING ALL TRANSACTIONS ARE PROPERLY
AUTHORIZED

ENSURING DOCUMENTS ARE PROPERLY RETAINED



WHEN IT COMES TO **PROTECTING VEON ASSETS**

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OR THEFT / Examples

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AVOIDING WASTE OR MISUSE OF VEON ASSETS

We are responsible for using good judgment to ensure that VEON assets are not misused or wasted. VEON assets include property and equipment, time, proprietary information and VEON funds. Limited incidental personal use of VEON equipment (for example, mobile phones, copy machines, computers, e-mail, etc.) is generally allowed if occasional, adds no significant cost to VEON, does not interfere with work responsibilities and is not related to an illegal or inappropriate activity.

You must know and follow the travel policy and rules that apply to you. You are responsible for getting the approvals you need. VEON will reimburse only legitimate business expenses. When choosing a hotel or ticket or meal, you should always look for the lowest-cost, reasonable option.

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AVOIDING WASTE OR MISUSE OF VEON ASSETS

PROTECTING VEON ASSETS FROM FRAUD OR THEFT / Examples

PROTECTING INTELLECTUAL PROPERTY

PROTECTING VEON INFORMATION
TECHNOLOGY SYSTEMS / Examples

ENSURING ALL TRANSACTIONS ARE PROPERLY
AUTHORIZED

ENSURING DOCUMENTS ARE PROPERLY RETAINED

PROTECTING VEON ASSETS FROM FRAUD OR THEFT

Always behave with honesty. **We must protect VEON funds and other assets as we would our own, guarding against misuse, loss, fraud or theft.** This includes VEON monies advanced to you and any procurement or payment cards you may hold. We must make sure that all expenses, claims, vouchers, bills, and invoices are accurate, comply with relevant VEON policies, procedures and rules and are submitted in a timely manner. We do not sell, transfer or dispose of VEON assets without proper documentation and authorization.

EXAMPLES:

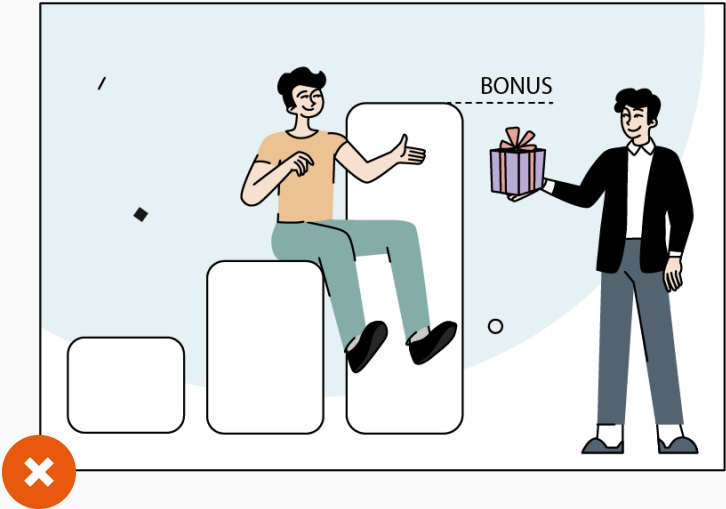
It is the last week of the quarterly reporting period. My boss wants to make sure we meet our numbers for the quarter, so he asked me to record now an unconfirmed sale that won't be finalized until next week. I guess this won't hurt anyone. Should I do what he says?

	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

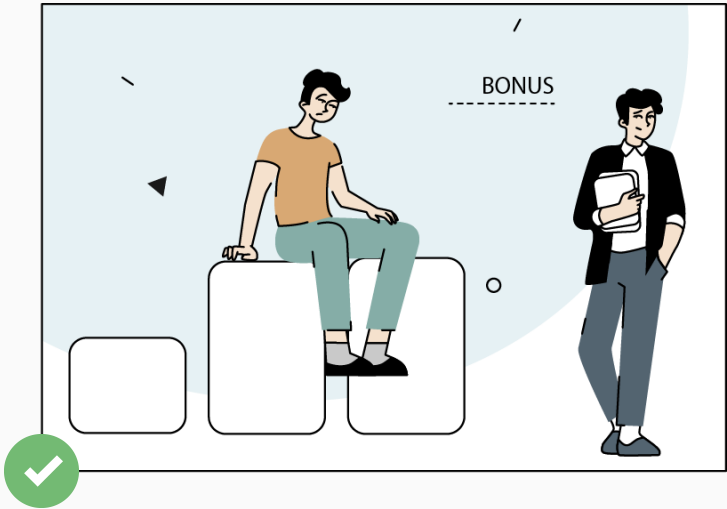
No. Costs and revenues must be recorded in the correct time period. The sale is not yet completed. It would be a misrepresentation and could amount to fraud to include it in an earlier period. It is your duty to report this case to the Finance, Legal, Ethics and Compliance or via SpeakUp Line.



EXAMPLES:



One of our dealers has just barely missed the target sales that would have made it eligible for the target bonus. VEON's manager responsible for work with dealers has decided to "round-up" the sales results of this dealer in order to enable the dealer to get a bonus. The manager says that it is one of our important dealers, and we have to pay the bonus in order to maintain good relations with the dealer. Are the manager's actions acceptable, given that he gains nothing personally?



No. Intentional inflation of sales numbers is against this Code and other VEON policies and procedures. You should immediately report this to the Compliance Officer, business unit controller or via the Compliance SpeakUp Line.



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AVOIDING WASTE OR MISUSE OF VEON ASSETS

PROTECTING VEON ASSETS FROM FRAUD
OR THEFT / Examples

PROTECTING INTELLECTUAL PROPERTY

PROTECTING VEON INFORMATION
TECHNOLOGY SYSTEMS / Examples

ENSURING ALL TRANSACTIONS ARE PROPERLY
AUTHORIZED

ENSURING DOCUMENTS ARE PROPERLY RETAINED

PROTECTING INTELLECTUAL PROPERTY

As VEON innovates, we regularly produce valuable, non-public ideas (intellectual property). Our intellectual property is one of our most valuable assets, and **we must protect it as we do other kinds of property or assets.** This includes taking adequate steps to protect our logo and brand from being used inappropriately by our business partners.

Your obligation to protect VEON intellectual property applies throughout your employment and continues after your employment ends. If you have any questions regarding the use or treatment of VEON intellectual property, please speak with your Legal.

WHEN IT COMES TO **PROTECTING VEON ASSETS**

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AVOIDING WASTE OR MISUSE OF VEON ASSETS

PROTECTING VEON ASSETS FROM FRAUD
OR THEFT / Examples

PROTECTING INTELLECTUAL PROPERTY

**PROTECTING VEON INFORMATION
TECHNOLOGY SYSTEMS** / Examples

ENSURING ALL TRANSACTIONS ARE PROPERLY
AUTHORIZED

ENSURING DOCUMENTS ARE PROPERLY RETAINED

PROTECTING VEON INFORMATION TECHNOLOGY SYSTEMS

Computer systems, and the information processed and stored on them, are critical to our business. **Everyone who uses VEON systems must ensure that these resources are used appropriately and in line with relevant privacy and security policies** (the Privacy Policy and Cyber Security Policy). Computer hardware, software and all information on VEON systems are VEON property. You are expected to use VEON systems responsibly and for business purposes. You may not access, store, or send sexually explicit material (whether images or text), material promoting violence or the intolerance of others, or material that is harassing or obscene. You must protect and not share with others your access credentials (e.g., your user ID or passwords) or allow others to use VEON equipment or resources.

EXAMPLES:



No. Log-in and passwords help to keep VEON information and technology resources secure. You must not disclose your log-in and password to anyone, even to your closest family members.



You must not provide your former colleague with VEON confidential information. Contact your manager immediately. Your manager may notify IT security and the Legal to determine how to protect VEON's confidential information and property.

WHEN IT COMES TO **PROTECTING VEON ASSETS**

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AVOIDING WASTE OR MISUSE OF VEON ASSETS

PROTECTING VEON ASSETS FROM FRAUD
OR THEFT / Examples

PROTECTING INTELLECTUAL PROPERTY

PROTECTING VEON INFORMATION
TECHNOLOGY SYSTEMS / Examples

ENSURING ALL TRANSACTIONS ARE PROPERLY AUTHORIZED

ENSURING DOCUMENTS ARE PROPERLY RETAINED

ENSURING ALL TRANSACTIONS ARE PROPERLY AUTHORIZED

Making commitments on behalf of VEON that are beyond your delegated authority is a serious breach of VEON's policies and can threaten VEON's financial integrity. At a minimum, agreements must be in writing and contain the entirety of the understanding between the parties. Before signing any corporate or transaction documents, you must follow your authority limits.

For more information regarding VEON authority limits, see the Group Authority Matrix.

WHEN IT COMES TO
PROTECTING VEON ASSETS

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AVOIDING WASTE OR MISUSE OF VEON ASSETS

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TECHNOLOGY SYSTEMS / Examples

ENSURING ALL TRANSACTIONS ARE PROPERLY
AUTHORIZED

ENSURING DOCUMENTS ARE PROPERLY RETAINED

**ENSURING DOCUMENTS ARE
PROPERLY RETAINED**

All documents and other records created or received in connection with your work must be retained in accordance with applicable laws and regulations, as well as VEON policies and instructions from the Legal.

For more information, see the Records Retention Policy.

WHEN IT COMES TO USING THIS CODE

There is a lot of information in this Code, but it cannot cover every situation that may arise. You will also need to consider specific local laws and regulations, as well as VEON policies referred and linked to in this Code and local policies and procedures. If there is a difference between this Code and local law, regulation or other VEON policies, you must apply the rule that sets the higher, stricter standard of behavior. It is your responsibility to know the laws and rules that apply to you and to seek advice if you are in doubt. If you encounter a situation that seems unclear, seek advice from your line manager, your Ethics and Compliance or your Legal.

Where to ask questions?

For general questions about this Code, you may speak with your line manager, Compliance, Legal, Human Resources or contact compliance@veon.com.

HOW DO YOU DECIDE WHAT TO DO?

WHERE DO YOU GO TO REPORT AN ISSUE?

CAN YOU REPORT ISSUES ANONYMOUSLY?

WHAT ARE THE CONSEQUENCES FOR VIOLATIONS OF THE CODE?

ARE YOU PROTECTED FROM RETALIATION?

HOW DO YOU DECIDE WHAT TO DO?

WHERE DO YOU GO TO REPORT AN ISSUE?

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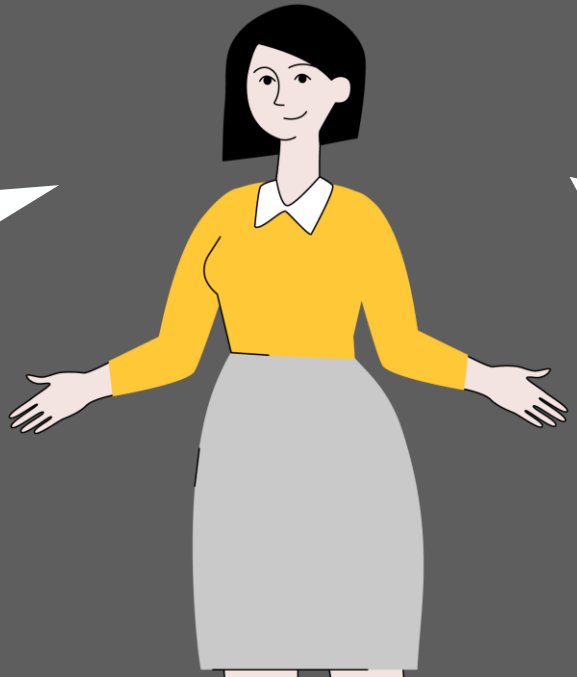
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ARE YOU PROTECTED FROM RETALIATION?

HOW DO YOU DECIDE WHAT TO DO?

You may encounter circumstances where VEON does not have a policy or standard, or you may not be certain that a policy is applicable to the facts in front of you. If so, ask yourself these questions to help you make the right choice and do the right thing.

- Does this violate the law or professional ethics?
- Is this inconsistent with the letter and spirit of this Code?
- Could this cause harm to VEON or damage to its reputation?
- Could this cause physical, emotional or other harm to someone?
- Would I be embarrassed if friends or family knew I did this?
- Would I be embarrassed if this were reported in a blog or news story?



If you can answer "no" to all of these questions, you are likely to be on safe ground.

If you say "yes" or "I'm not sure" to any of these questions, seek guidance from your line manager, Ethics and Compliance or Legal. Use good judgment and common sense, so that your actions do not violate law, damage VEON's reputation, or put yourself or VEON at risk.

HOW DO YOU DECIDE WHAT TO DO?

If you supervise others, you have more responsibility. You must promote compliance and ethics by example:

- Make sure that those who report to you understand this Code's requirements and comply with them.
- Uphold VEON's zero tolerance for bribery and corruption in all business dealings.
- Maintain an environment where people feel comfortable raising concerns.
- Follow the Code consistently and support those who in good faith raise questions or concerns and ensure confidentiality and non-retaliation. Consider conduct in relation to this Code when evaluating performance.
- Never encourage or allow someone to achieve business results at the expense of ethical conduct or compliance with this Code or applicable law.

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WHERE DO YOU GO TO REPORT AN ISSUE?

You may raise a concern or speak up by:

- directly contacting your line manager or Ethics and Compliance;
- emailing compliance@veon.com;
- reporting online at veon.com/speakup.

VEON takes reports of potential violations of this Code seriously and is committed to preserving confidentiality and reviewing allegations of misconduct promptly and professionally. You must cooperate with internal investigations.

For more information, please refer to the Speak Up: Raising Concerns and Non-Retaliation Policy, the Investigations Management Policy.



CAN YOU REPORT ISSUES ANONYMOUSLY?



Knowing your identity will help VEON conduct the most thorough investigation into your concerns, so we encourage you to identify yourself when reporting a known or suspected violation. If you are uncomfortable identifying yourself, you may report anonymously in most jurisdictions. No matter how you choose to report, VEON will review your concerns and take appropriate action.

HOW DO YOU DECIDE WHAT TO DO?

WHERE DO YOU GO TO REPORT AN ISSUE?

CAN YOU REPORT ISSUES ANONYMOUSLY?

WHAT ARE THE CONSEQUENCES FOR VIOLATIONS OF THE CODE?

ARE YOU PROTECTED FROM RETALIATION?

WHAT ARE THE CONSEQUENCES FOR VIOLATIONS OF THE CODE?

A violation of the Code is a serious matter. Consequences for violations of the Code may include:

- warnings, training or coaching;
- disciplinary measures up to loss or reduction of merit increase, short or long-term incentives, eligibility for promotion;
- suspension without pay;
- termination of employment.

Where warranted, VEON may initiate legal proceedings and/or notify relevant authorities.



HOW DO YOU DECIDE WHAT TO DO?

WHERE DO YOU GO TO REPORT AN ISSUE?

CAN YOU REPORT ISSUES ANONYMOUSLY?

WHAT ARE THE CONSEQUENCES FOR VIOLATIONS OF THE CODE?

ARE YOU PROTECTED FROM RETALIATION?

ARE YOU PROTECTED FROM RETALIATION?

Anyone who in good faith seeks advice, raises a concern or reports misconduct is following this Code – and is doing the right thing.

VEON will not tolerate any reprisal or adverse action against anyone who raises a concern in good faith.



HOW DO YOU DECIDE WHAT TO DO?

WHERE DO YOU GO TO REPORT AN ISSUE?


CAN YOU REPORT ISSUES ANONYMOUSLY?

WHAT ARE THE CONSEQUENCES FOR VIOLATIONS OF THE CODE?

ARE YOU PROTECTED FROM RETALIATION?


EXAMPLES:

What happens when I call SpeakUp Line?




I'll do my best to help you!

If you call Compliance SpeakUp Line, the person taking your call will report your question or concern, with strict confidentiality, so it can be addressed by the appropriate individual within VEON. Every effort will be made to give your call a quick response and to deal with your question or concern properly, especially when circumstances make it time critical.



I have been thinking about calling the Compliance SpeakUp Line, but I'm not sure if I should. My line manager told me to do something that I feel is not right and may even be illegal. I think I should tell someone, but I'm afraid that my line manager will make my job difficult for me if I do. What should I do?

This is SpeakUp Line, how can I help you?



Even in great companies, people sometimes do things they shouldn't. You have identified what you believe is a potentially serious matter. The Code says that if something does not feel right, you need to speak up. If you are not comfortable speaking to your line manager, speak to your Local Compliance colleagues or contact the SpeakUp Line via veon.com/speakup. VEON will consider the situation and will not tolerate your line manager or anyone else retaliating against you. The right thing to do is report your concerns.



“Thank you for reading VEON’s Code of Conduct. There’s a lot in it, but that reflects the world we work in and the seriousness of our commitment to do business ethically and following applicable laws.

The key points: learn and follow the rules that apply to you. When in doubt, ask for advice. We will support and help you. If you see something wrong, report and escalate. We will follow up, and we will protect anyone reporting concerns in good faith.

Together we will make VEON successful and a company we are all proud to work for”.

Ethics and Compliance

Requests for waivers or exceptions to this Code of Conduct must be made in writing to the the Group General Counsel and Chief Internal Audit and Compliance Officer. In the case of directors or executive officers, waiver requests may be granted only by the Board of Directors. If waivers are granted, they will be appropriately disclosed as required by law.

This Code of Conduct is approved by the VEON Board of Directors.

