

Distribution
All Eltel companies

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SUPPLIER CODE OF CONDUCT

1 PURPOSE

Eltel Group, including companies, business units and entities belonging to Eltel group of companies (hereinafter referred to as “Eltel”), sets high ethical standards in performing its business by operating in an economically, environmentally and socially responsible manner.

Respectively, when interacting with third parties such as subcontractors and other suppliers (hereinafter collectively referred to as “Suppliers”, and individually as “Supplier”), Eltel expects its Suppliers to operate in compliance with ethical and responsible business conduct and the values and principles described in this supplier code of conduct (hereinafter referred to as “Supplier Code of Conduct”). To this end Eltel contractually obliges its Suppliers to apply the principles expressed in this Supplier Code of Conduct. Furthermore, all Suppliers shall ensure that their subcontractors comply with the principles set out in this Supplier Code of Conduct.

Failure to read and/or acknowledge this Supplier Code of Conduct does not exempt a Supplier from its responsibility to comply with the Supplier Code of Conduct nor applicable laws, regulations, and other policies that are related to Supplier's duties.

The purpose of this Supplier Code of Conduct is to prevent unlawful and/or unethical conduct. The Supplier Code of Conduct aims to promote an enhanced culture of trust, accountability and integrity and Eltel's and its Suppliers' performance as a good corporate citizen in all markets where Eltel operate.

2 APPLICABILITY AND SCOPE

This policy applies to all Suppliers and their subcontractors that engage in co-operation with entities of the Eltel Group.

3 POLICY STATEMENT

In order to ensure that Supplier conducts its business in an ethical, transparent and fair manner the following ethical standards are applied throughout Supplier.

3.1 Compliance with laws, respect for culture and custom

Supplier will respect all applicable laws and regulations of any country where Supplier operates (hereinafter referred to as “Legislation”) and abide by the high ethical standards set for Supplier's business operations, including operating in an economically, environmentally and socially responsible manner. Supplier will endeavor to respect the culture, structures and customs of the communities and

countries, where Supplier operates to the extent this does not violate any Legislation or standards set out in this Supplier Code of Conduct.

Should any unlawful or unethical conduct be detected involving Supplier's operations, all appropriate steps will be taken to timely respond to such conduct and to prevent further similar conduct.

3.2 Regulatory investigations, Inspections and Inquiries

Supplier will be direct, honest and truthful in all discussions with regulatory and law enforcement agency representatives and government officials and will cooperate by responding to appropriate requests for information.

3.3 Respect for environment, quality standards

In all its operations, Supplier will respect the environment and its sustainable development. In particular, Supplier is committed to compliance with high quality standards.

3.4 Labour

Supplier will apply decent and fair working conditions for all of its employees as well as among its subcontractors, suppliers and other contracting parties in all countries where Supplier operates. Safety at work is a key factor in decent and fair working conditions. Furthermore, Supplier is particularly committed to the elimination of all forms of forced and compulsory labour, prevention of child labour and non-discrimination in respect of employment and occupation.

3.5 Human rights

Supplier respects internationally proclaimed human rights and is committed to not being directly or indirectly involved in human rights abuses.

3.6 Payments, books and records

All payments by Eltel will be effected only against receipt of a detailed invoice and due approval of the same by an authorized Eltel manager, director or employee. All payments will be made only against actually rendered services or provided goods and only to parties with whom Eltel has a valid and proper business relationship.

Supplier will issue and submit to Eltel detailed invoices and records. All invoices are based on actually rendered services or provided goods.

Supplier will keep detailed books and records of all incomes and expenses and comply with good bookkeeping practices as required by relevant Legislation.

3.7 Fair competition

Supplier will comply with all applicable competition and anti-trust laws. Supplier is particularly committed to competing fairly in all markets where Supplier operates since competition is a key driver for innovation and efficiency. Information regarding business secrets belonging to third parties shall not be unjustifiably obtained or sought nor shall such information be used in any unjustifiable way.



3.8 Anti-corruption and anti-bribery measures

Eltel has zero tolerance for bribery and corruption. Bribery means offering, giving, receiving, or soliciting of something of value for the purpose of influencing the action of an official or private company as they perform their duties. Corruption means abuse of entrusted power for private gain, which could include conflict of interest, embezzlement, kickbacks, extortion, or nepotism.

- Supplier is committed to conducting business with high integrity which does not involve any forms of bribery or corruption.
- Supplier does not directly, or through third-parties acting on our behalf, pay or offer to pay bribes.
- Supplier does not offer or accept gifts that will improperly influence our business decisions or those of our partners.
- Supplier is committed to and will comply with all anti-money laundering legislation, including reporting obligations.

3.9 Reporting of matters of violation

Supplier managers, directors, employees or other stakeholders (hereinafter referred to as "Supplier employees") may come across a situation that appears to not be in conformance with the values as set out in the Supplier Code of Conduct. In such instance Supplier employees should bring any concern to Eltel's attention, either by speaking directly to the relevant Eltel manager or, if Supplier employee does not feel comfortable going to such Eltel manager, Supplier employee can use Eltel's whistleblowing system (<https://www.eltelgroup.com/contact-us/whistleblowing-system/>). All Supplier employees are encouraged to report any conduct believed, in good faith, to be a violation of laws or the other expectations on conduct defined by this Supplier Code of Conduct.