Policy
"Compliance with Anticorruption Legislation"

1. DOCUMENT INFORMATION

Purpose of the Document	• To establish the standards of responsible business behavior, to implement and develop best corporate governance practices; • To demonstrate the Company's commitment to the principles of legality, transparency and social responsibility; • To outline the principles aimed at preventing any form of corruption and compliance with the requirements of the Applicable Anticorruption Legislation in the course of conduction of business activity by the Company in any country in the world; • To raise the level of corporate compliance culture in the Company as well as to raise awareness of the Persons covered by the Policy of the risks of corruption and to assist in clarifying and observing the rules.
Document Overview	The purpose of this Policy is to: • establish the key principles and requirements for preventing, detecting and responding to bribery and corruption in compliance with the Applicable Anticorruption Legislation; • define the Company's risk-based approach to identifying, assessing, mitigating and monitoring corruption risks in both public and private sectors; • promote a culture of integrity, ethical business conduct and zero tolerance towards bribery and corruption throughout the Company; • assign roles and responsibilities for the effective implementation and continuous improvement of the Company's Anti-Corruption Compliance Program.
Access Restriction	None

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2. DEFINITIONS OF TERMS, ABBREVIATIONS AND ROLES

2.1.Definitions of terms and abbreviations

Term	Abbreviation	Term definition (abbreviation expansion)
Applicable definitions:		
Anticorruption Clause	ACC	Commitments, as well as warranties and representations of the party/parties to comply with the applicable anticorruption legislation.
Anticorruption Compliance (Anticorruption Compliance Program)		The Company's integrated system of governance, policies, procedures, controls and measures designed to prevent, detect, respond to and continuously improve the management of bribery and corruption risks, ensure compliance with the Applicable Anticorruption Legislation, and promote a culture of integrity and ethical business conduct throughout the Company.
Interaction with Public Officials		Any direct or indirect communication, meeting, correspondence, negotiation, transaction or other business-related interaction, whether conducted in person, electronically or through an intermediary, with a Public Official or a Public Organization on behalf of or in connection with the Company's business activities.

Term	Abbreviation	Term definition (abbreviation expansion)
Public Organization		Any governmental or public authority, ministry, agency, department, regulatory or supervisory body, municipality or other public institution of the Republic of Armenia or any foreign jurisdiction; any state-owned or state-controlled enterprise or other legal entity directly or indirectly owned or controlled by a government; any political party; any candidate for public office; and any public international organization.
Public Official	PO	Any Armenian or foreign appointed or elected person holding any position in the legislative, executive, administrative or judicial branch of government, or in a public international organization; any person performing a public function for or on behalf of a state, including for a government agency, ministry or other public authority; political party officials, candidates for public office, ambassadors, employees and officers of state-owned or state-controlled enterprises, natural monopolies or public institutions (including healthcare, education, military and municipal institutions); as well as any person acting on behalf of such entities or for the benefit of a Public Official. For the purposes of this Policy, the term also includes close family members and close associates of Public Officials where required by the Applicable Anticorruption Legislation.
Subsidiary Company	SC	A Company, in respect to which Viva Armenia, by virtue of dominant participation in its charter capital, or in accordance with the agreement entered into by and between Viva Armenia and the company, or otherwise is capable of determining resolutions made by such company (including the companies where Viva Armenia or a group of persons of Viva Armenia is able to use third parties to actually control votes falling on voting shares of which more than 50% of the charter capital of the company consists).
Bribery		The offering, promising, giving or authorizing, directly or indirectly, of any financial or other advantage to a Public Official or any other person, for the purpose of improperly influencing the performance of their duties, obtaining or retaining business, securing an improper advantage, or inducing any improper act or decision.
Business Hospitality		The Company's expenses to welcome and serve representatives of other companies (including foreign companies), which participate in business events in order to establish and (or) maintain mutual cooperation, as well as similar expenses borne by another person for the Persons covered by the Policy. Business hospitality includes entertainment allowance and other entertainment expenses. Business hospitality of the Company includes the expenses for: • business breakfasts, lunches and dinners, including formal receptions, snacks and drinks; • travel and accommodation expenses related to business breakfasts, lunches, dinners, cultural and entertainment or professional events; • all forms of cultural and entertainment events, such as invitations (tickets) to sports, theater and cultural events or events organized under sponsorship of Viva Armenia; • expenses related to payment for visiting external professional events, such as conferences, trade exhibitions, training events, etc.
Abuse of Powers		The improper or unauthorized use of a person's position, authority or powers for personal benefit or for the benefit of another person, or to obtain an improper advantage, cause harm, avoid an obligation or otherwise act contrary to the legitimate interests of the Company or any other organization, in violation of applicable law, internal policies or ethical standards.
Commercial Bribery		The offering, promising, giving, requesting, agreeing to receive or accepting, directly or indirectly, of any financial or other advantage by or to a person performing managerial, executive or other business-related functions in a commercial or private-sector organization, either personally or through an intermediary, for the purpose of improperly influencing the performance of their duties, obtaining or retaining

Term	Abbreviation	Term definition (abbreviation expansion)
		business, securing an improper business or personal advantage, or inducing any improper act, omission or decision.
Company		Viva Armenia, including all structural subdivisions, affiliates and representations. Viva Armenia, all the subsidiary and affiliated companies of Viva Armenia, as well as all the companies under direct or indirect control of Viva Armenia.
Counterparty		Any legal entity or individual, including an individual entrepreneur, engaged by, acting on behalf of, or acting in the interests of the Company, or providing goods, works or services to the Company, whether within or outside procurement processes. This includes, without limitation, suppliers, vendors, contractors, subcontractors, distributors, dealers, landlords, professional service providers, consultants, agents, intermediaries and any other business partners. For the purposes of this Policy and the Company's due diligence procedures, any third party receiving payments directly or indirectly in connection with the Company's business activities shall also be deemed a Counterparty, regardless of whether such third party is a direct contractual party.
Conflict of Interest		A situation in which the direct or indirect Personal Interest of a Person covered by this Policy, or the Personal Interest of their Associates, or their positions, relationships or activities outside the Company, actually, potentially or apparently affect, or may affect, the objective, independent and impartial performance of their duties, exercise of their powers or decision-making in the best interests of the Company.
Corruption		Any act involving the offering, promising, giving, requesting, agreeing to receive or accepting, directly or indirectly, of any financial or other advantage, or the abuse of entrusted power, position or influence, for the purpose of improperly influencing the performance of duties, obtaining or retaining business, securing an improper advantage, or otherwise obtaining an undue benefit for oneself or another person. Corruption includes, but is not limited to, bribery, commercial bribery, facilitation payments, abuse of office, embezzlement, fraud, influence peddling and other conduct prohibited under the Applicable Anticorruption Legislation.
Local Regulation (Internal Normative Documents)	LR	A document containing generally binding standards of conduct within the Company, which the Company adopts within its competence in accordance with laws and other regulatory legal acts.
Facilitation Payment		Any unofficial payment or other financial or non-financial advantage, whether made directly or indirectly, to a Public Official or any other person for the purpose of expediting, facilitating or securing the performance of a routine administrative or governmental action to which the payer is otherwise legally entitled, but which is not permitted under the Applicable Anticorruption Legislation.
Gift		Any item, service, benefit or other thing of value that is offered, given, received or accepted without adequate consideration or for less than its fair market value. Gifts may include, but are not limited to, cash or cash equivalents (where permitted by this Policy), goods, gift cards, discounts, hospitality, travel, accommodation, entertainment, invitations or any other benefit of value.
Political Sponsorship (financing of political activities)		Assistance in monetary or any other form, provided in support of Government organizations (including parties), their employees, Governmental Officials or candidates for such positions.
Acceptance of a Bribe		The requesting, soliciting, agreeing to receive or accepting, directly or indirectly, personally or through an intermediary, of any financial or other advantage by a Public Official in exchange for performing, delaying, influencing or omitting to perform an official act or duty, abusing their position or authority, providing preferential treatment, obtaining or conferring an improper advantage, or otherwise acting contrary to their official duties or applicable law.
Intermediation in Bribery		Any direct or indirect assistance in the offering, promising, giving, requesting, agreeing to receive or accepting of a bribe, including

Term	Abbreviation	Term definition (abbreviation expansion)
		arranging, facilitating, coordinating, transferring or otherwise assisting in the negotiation, execution or concealment of a bribery arrangement, whether acting on behalf of the bribe giver, the bribe recipient or any other person.
Intermediation in Commercial Bribery		Any direct or indirect assistance in the offering, promising, giving, requesting, agreeing to receive or accepting of a commercial bribe, including arranging, facilitating, coordinating, transferring or otherwise assisting in the negotiation, execution or concealment of a commercial bribery arrangement, whether acting on behalf of the person offering, giving, requesting, receiving or accepting the commercial bribe, or any other person.
Applicable Anticorruption Legislation		The legislation of the Republic of Armenia governing the prevention, detection, investigation and prosecution of bribery, corruption and related offences (including, but not limited to, the Criminal Code of the Republic of Armenia, the Code of Administrative Offences of the Republic of Armenia, and other applicable legislation establishing criminal or administrative liability for corruption-related offences), together with the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010, and any other applicable anti-bribery and anti-corruption laws and regulations of the jurisdictions where the Company conducts its business or which are otherwise applicable to the Company's activities.
Entertainment Expenses		The Company's expenses to welcome and serve representatives of other companies (including foreign companies), which participate in negotiations in order to establish and (or) maintain mutual cooperation, and participants that arrived to meetings of the Board of Directors (Management Board) or other management body.
Employees		Individuals, having concluded employment or service contract with the Company
Valuables (anything of value)		All (tangible or intangible) things that have value for the recipient. Valuables may mean, including, but not limited to the following: cash; transfer of shares, bonds or any other property; payment of expenses; provision of services of any type; gifts; travel vouchers); business hospitality; employment; discounts, debt release; use of the desired telephone numbers ("nice-looking numbers"); job offers and offers of internships, including those for family members; donations to certain charitable organizations; any other transfer of goods, services, tangible or intangible assets that benefits the recipient. Any valuables of any value may be deemed illegal under applicable anticorruption legislation.

2.2.Definitions of functions

Function name	Function definition
Introduced definitions:	
None	None
Applicable definitions:	
Direct Supervisor	Line Manager of the Employee

3. GENERAL PROVISIONS

The Company has **zero tolerance** for bribery and corruption in any form. Bribery and corruption are inconsistent with the Company's values, principles of integrity and ethical business conduct, expose the Company and the Persons covered by this Policy to significant legal, financial and reputational risks, and undermine fair competition and public trust.

This Policy establishes the Company's principles and minimum requirements for preventing, detecting and responding to bribery and corruption risks and forms an integral part of the Company's Anticorruption Compliance Program.
This Policy does not replace or supersede the requirements of the Applicable Anticorruption Legislation. However, it may establish additional or more stringent requirements.
Where the Applicable Anticorruption Legislation imposes stricter or additional requirements than those set out in this Policy, the requirements of the Applicable Anticorruption Legislation shall prevail.
The Company shall establish, implement and maintain appropriate policies, procedures, controls and decision-making processes to ensure compliance with the Applicable Anticorruption Legislation and this Policy. The Company shall promote the implementation of equivalent anti-corruption standards and controls within its controlled subsidiaries and shall use reasonable efforts to encourage the adoption of comparable standards by entities over which it does not exercise control.
No Person covered by this Policy shall engage in, authorize, direct, facilitate or knowingly tolerate any form of bribery, corruption or other conduct prohibited by this Policy, whether directly or indirectly, including through a Counterparty or any other third party.

This Policy is binding on:

- all Employees;
- members of the management bodies and other governing bodies of the Company (including the Board of Directors, Committees under the Board of Directors and the General Manager);
- Counterparties – to the extent provided for by contracts (agreements) concluded with such persons/entities.

For the purposes of this Policy, all persons required to comply with this Policy shall hereinafter be referred to as the **"Persons covered by the Policy."**
The Persons covered by this Policy shall acknowledge that they have read, understood and agreed to comply with this Policy in accordance with the procedures established by the Company, including by electronic means where permitted by applicable law and the Company's internal procedures.

4. APPLICABLE ANTICORRUPTION LEGISLATION

The Policy is developed in accordance with the requirements of the Applicable Anticorruption Legislation, the Charter, the Code of Business Conduct and Ethics and and other applicable the Company's internal normative documents (LR).

5. KEY PRINCIPLES

The Company adheres to the principles of compliance with the Applicable Anticorruption Legislation and ethical conduct in all types of business relations and regardless of the territory in which the Company pursues its business. The Company expects all persons acting on behalf of or to the advantage of the Company to comply with Applicable Anticorruption Legislation.

5.1. Zero Tolerance to Corruption in all Forms and Manifestations

The Company openly **declares zero tolerance to corruption** in any form and requires unconditional compliance with the key Policy principles and requirements from the Persons covered by the Policy.

5.2. Tone-at-the-Top and Tone-from-the-Middle

The Company management, regardless of the level, including members of the management bodies, perform their official and/or corporate duties reasonably and in good faith being guided by the highest professional and ethical standards, legal norms and best corporate governance practices, putting the Company interests above their own.

The Board of Directors of the Company and the Company management shall set the example for the standard of high ethical behavior for the Persons covered by the Policy, as well as zero tolerance of any corruption forms and manifestations, which is an integral part of the corporate culture and daily business of the Company.

The Board of Directors and the Company's management, regardless of the level, shall demonstrate leadership and commitment to the Anticorruption Compliance Program, ensure the allocation of adequate resources, oversee its implementation and effectiveness, and promote its continual improvement.

5.3. Reputation Strengthening

The Company takes reasonable actions to prevent hiring individuals who are known to take or to have taken part in illegal activity or to be involved in activities contradicting the ethical standards established in the Company to Company executive positions or to the management bodies.

5.4. Periodic Risk Assessment and Minimization

The Company performs the activities to identify, assess and reassess corruption risks on an annual basis, based on the results of which anti-corruption procedures reasonable and proportional to the level and nature of the risks detected shall be developed and introduced.

5.5. Notification and Training

The Company continuously monitors the changes in the Applicable Anticorruption Legislation and timely notifies all stakeholders about any relevant changes and trends.

The Company implements and maintains a training program for **Persons covered by the Policy** on the requirements of the Applicable Anticorruption Legislation and corporate compliance controls through a specially elaborated training system: on a regular basis but in no event less than once per 2 (two) years in face-to-face, remote or other available format

5.6. Monitoring the Effectiveness of Controls

The Company exercises monitoring of effectiveness of implemented anticorruption controls, monitors compliance with them and, if required, improves them.

The Company takes measures to revise the relevance of compliance controls with the subsequent update of the LR containing such controls annually.

5.7. Audit and Control

The Company ensures regular conduct of internal and external audits of financial and economic activities, as well as continuously monitors the completeness and accuracy of all business transactions in accounting and compliance with Applicable Anticorruption Legislation and LR, including the key principles and requirements established by the Policy.

5.8. Responsible Officer and Responsible Unit, Reporting

The Head of Compliance is responsible for the introduction and improvement of the Anticorruption Compliance Program, he/she has the experience and competencies required, as well as is provided with independence, powers and resources sufficient to perform their duties.

The Head of Compliance, as well as any person to whom he/she has delegated relevant authority, may participate in meetings of the Company's collegial management bodies, where necessary, provide explanations on matters under consideration and present the compliance opinion and recommendations to the members of such bodies to support informed decision-making at both strategic and operational levels. The Head of Compliance is entitled to contact the Head of Internal Control and Audit Department and the Chairman of the Board of Directors of the Company at any time and at his/her own discretion in order to initiate the submission of any issues to be reviewed by the Board of Directors of the Company..

The Head of Compliance and the Compliance Team monitors compliance with the requirements of the Policy and Applicable Anticorruption Legislation, performs day-to-day management of the Anticorruption Compliance Program and its continuous improvement, as well as participates in the coordination of transactions with a high corruption risk.

6. CORRUPTION RISK AREAS

6.1. Interaction with Public Officials (PO) and Public Organizations

Interaction with Public Officials (PO) and Public Organizations Interactions with Public Officials and Public Organizations present an inherently higher risk of bribery and corruption and therefore shall be conducted with enhanced transparency, integrity and oversight, in strict compliance with this Policy, the Applicable Anticorruption Legislation and the Company's internal regulatory documents.

The Company and the Persons covered by this Policy shall not offer, promise, give or otherwise provide, directly or indirectly, any financial or other advantage to a Public Official or Public Organization for the purpose of improperly influencing any official act or decision or obtaining or retaining business or securing any improper business or other advantage.

The employment, engagement or internship of current or former Public Officials shall be subject to the Company's established integrity assessment and internal approval procedures in accordance with the Applicable Anticorruption Legislation.



It is strictly prohibited to offer, promise, give or otherwise provide, directly or indirectly, any financial or other advantage to a Public Official for the purpose of improperly influencing any official act or decision or obtaining or retaining business or securing any improper business or other advantage.

6.2. Gifts and Business Hospitality

Gifts and Business Hospitality may serve legitimate business purposes, such as building and maintaining professional relationships. However, they may also be used to improperly influence decisions and, under certain circumstances, may constitute bribery or commercial bribery.

The Persons covered by this Policy shall not offer, provide, request or accept Gifts or Business Hospitality that could improperly influence, or appear to influence, business or official decisions, create a conflict of interest or give rise to the appearance of a conflict of interest.

The use of Gifts or Business Hospitality as a means of bribery, commercial bribery or any other corrupt practice is strictly prohibited. The solicitation or extortion of Gifts or Business Hospitality is likewise strictly prohibited.



Giving and receiving Gifts is permissible subject to observing the principles specified in the relevant LR.

6.3. Sponsorship, Charity, Donation and Corporate Social Responsibility

The Company is committed to supporting corporate social responsibility (CSR) initiatives and contributing to sustainable social development through transparent and responsible sponsorships, charitable contributions and donations. The Company supports initiatives implemented by charitable, educational, cultural, healthcare, environmental and other non-profit organizations that contribute to the well-being of society and the creation of equal opportunities in the communities where the Company operates. The Company **shall not finance** and shall **not participate** in any other way in charitable and/or sponsorship activities in order to obtain **any undue advantages** or preferences in connection with economic activities.

Participation of the Company in sponsorship and charitable activities is governed by the procedures developed and introduced in the Company.

More detailed requirements for sponsorship, charity and corporate social responsibility are available in PL-ARM-080 CSR Activities of Viva Armenia, PL-ARM-082 Viva Armenia Social Investment projects, PR-ARM-138 Sponsorship Projects' Organization.



*Charity, sponsorship and corporate social responsibility activities **targeted at illegal influencing are forbidden**.*

6.4. Participation in Political Activities

The Company shall **not finance** and in no other way **support or encourage** political parties or their members, including candidates for political posts, their election campaigns or political events, as well as any political organizations or movements. The Company does not allow any political contributions.

The Company does **not prohibit** the participation of Employees in political activities, unless is contradicts the Applicable Legislation and provided that the Employees do not use the Company property and name in such activities. If an Employee is applying for or was elected/appointed to the position of the Public Organization and intends to enter upon duty, this Employee shall first notify the Company in accordance with PL-ARM-506 “Managing the Conflict of Interest”.



*The Company does **not fund** or **participate** in political activities*

6.5.Facilitation Payments

It is forbidden to make any payments or grant other benefits that are not provided for by applicable legislation and which are offered in order to facilitate or simplify the standard procedure (action) to which the Company has the right in accordance with the legislation, a contract or on other grounds.



*Any facilitation payments are **forbidden**.*

6.6.Payments through Intermediaries or in Favor of Third Parties

It is forbidden to make payments in favor of any third parties if it is known or there are certain reasons to believe that all or part of such payment will be used for corruption.

The Company is entitled to conduct verification procedures regarding any third parties in order to prevent and/or identify the risks of the Company’s involvement in corruption activities.



*Any payments aimed at corruption are **forbidden**.*

6.7. Conflict of Interest

The Company is committed to preventing, identifying, disclosing and appropriately managing actual, potential and perceived conflicts of interest. No Person covered by this Policy shall allow his/her Personal Interest (direct or indirect) to affect, or appear to affect, the proper, objective and impartial performance of his/her duties or exercise of powers.

The Persons covered by the Policy shall comply with the rules regarding the conflict of interest stipulated in PL-ARM-506 “Managing the Conflict of Interest”.



Any Conflict of Interest is subject to mandatory settlement.

6.8.Transactions of Acquisition and Alienation of Participation Interest in Other Companies

The Company established special rules for compliance with the Applicable Anticorruption Legislation, including anticorruption verification procedures, for executing the transactions of mergers and acquisitions and (or) acquisition/sale of an interest in any legal entity. When assessing such a transaction, the Company examines the activities of the transaction subject and/or the partner in order to detect the risks of participation of such a company or partner in corruption actions committed by them earlier. This work includes, but is not limited to, due diligence prior to executing a transaction, as well as determination of the measures to be taken within the integration process after acquiring the asset.



*Transactions on the acquisition or sale of participation interests in other companies are subject to **mandatory anti-corruption expert examination.***

6.9. Contractual Policy

6.9.1. Prohibition of Non-Contractual Relationships

The Company prohibits to enter on its behalf and in its interests into any non-contractual relations not provided for by the applicable legislation or LR with any types of counterparties, including any written or oral agreements, also their soft copies, not included in the main text of the contract with the Counterparty or its annexes, or in any other form, and not having passed the standard approval procedures adopted by the Company.

Any contract or agreement entered into by the Company in writing or electronically shall contain the entirety of conditions and arrangements subject to which such contract or agreement is entered into.

6.9.2. Due Diligence on Counterparties

In its relationships with Counterparties, the Company conducts integrity and anticorruption due diligence in order to comply with the Applicable Anticorruption Legislation, identify and assess bribery, corruption, conflict of interest, sanctions and other integrity-related risks, and prevent the Company from being involved, directly or indirectly, in unlawful or unethical activities.

The Company expects its Counterparties to comply with the Applicable Anticorruption Legislation, the Company's applicable internal regulatory documents where contractually agreed, and generally accepted

principles of integrity and ethical business conduct throughout the procurement process and during the course of the business relationship.

Counterparty due diligence is carried out in accordance with the Company's established procedures. More detailed requirements are set out in PR-ARM-016 "Contractors_Info_Assessment" and PR-ARM-126 Third parties anti-corruption check.

6.9.3. Anticorruption Clause

The Company in entitled to initiate the inclusion of an anticorruption clause (ACC) in the contracts/agreements concluded based on the results of the due diligence on Counterparties to minimize the risk of corruption activities performed by the Counterparty.

More detailed requirements regarding the ACC text are available in PR-ARM-164 Contractual Work in Viva Armenia



Interaction with Counterparties shall be carried out on a contractual basis and with mandatory due diligence in accordance with the Company LR.

6.10. Marketing

The Company implements marketing activities to engage, keep and increase customer loyalty.

Any marketing activities are **forbidden if** they are aimed at:

- obtaining any unlawful business-related advantages or preferences;
- payment of remuneration to a PO, the representative of commercial organizations and/or any other person for the purposes of influencing their actions (ensuring their inaction) and/or inducing them to improperly discharge their official duties and/or for the purposes of gaining an unfair commercial advantage.

More detailed marketing requirements are available in PR-ARM-011 Control Over Marketing Program, PL-ARM-054 Managing Direct Contacts.



*It is **forbidden** to carry out marketing activities targeted at illegal influencing.*

6.11. Accounting Procedures

All financial operations, postings and records shall be reflected accurately, correctly and with the sufficient level of detail in the Company's accounting records, documented and available for audit.

The Company developed and implemented the procedures of internal financial control aimed at the following:

(1) execution of financial transactions in accordance with the general or special sanction of the management;

(2) accuracy and completeness of accounting records that enable drawing up the statements pursuant to the applicable accounting (financial) reporting standards;

(3) access to disposal of assets only in accordance with the general or special sanction of the management;

(4) regular reconciliation of accounting records of the value and composition of assets with the actual value and composition.

The Company shall appoint Employees responsible for the preparation and submission of complete and reliable accounting statements within the timeframes provided for by the applicable law.

*Failure to comply with or an attempt of failure to comply with the procedures of internal financial control, misstatement or falsification of accounting statements of the Company shall be **prohibited**.*

6.12. Books, Records and Internal Controls

The Company shall maintain accurate books, records and accounts that fairly and accurately reflect all transactions and dispositions of assets. No undisclosed, off-the-books or unrecorded accounts, funds or transactions shall be established or maintained. All transactions shall be properly authorized, supported by appropriate documentation and subject to the Company's internal controls. The creation or maintenance of false, misleading, incomplete or artificial records is strictly prohibited.

7. REPORTING VIOLATIONS

7.1. Those employees, members of the management bodies and other bodies of the Company who became aware of or have reason to believe that the principles or requirements of this Policy and Applicable Anticorruption Legislation are violated, shall immediately report this in any of the following ways:

- *to the Direct Supervisor or, if this report relates to the actions committed by the Direct Supervisor, to the superior manager (in any form);*
- *by sending an e-mail to the Hotline at: hotline@viva.am;*
- *to the Compliance Manager (in any form);*
- *via the electronic form of the Hotline on the OurPlanet corporate portal (anonymously or on its own behalf);*
- *via e-form of the Hotline at official Viva web - www.viva.am (anonymously or on its own behalf).*

The Counterparties can send a violation report in any of the following ways:

- *to the e-mail of the Hotline at: hotline@viva.am;*
- *via e-form of the Hotline at official Viva web - www.viva.am (anonymously or on its own behalf).*

7.2. The Company provides an independent and comprehensive review of all reports of violations of the Policy requirements pursuant to the LR.

7.3. The Company prohibits any form of prosecution (retaliation) against the Persons covered by the Policy, who reported a violation in good faith, assisted in investigations and refused to participate in the activities contradicting the principles or requirements hereof and of the Code of Business Conduct and Ethics. violated

7.4. Any Person covered by the Policy who has its requirements may be subject to disciplinary measures, up to dismissal and (or) termination of contracts in accordance with the provisions of these contracts and applicable legislation.

More detailed requirements for reporting violations are available in PR-ARM-053 Official Investigation, RP-ARM-319 Handling of Messages of the Hotline of Viva Armenia,

8. POLICY EXECUTION

The Persons covered by the Policy, regardless of their position, are responsible for compliance with the principles and requirements of the Policy and Applicable Anticorruption Legislation, as well as for improper control of the actions of their subordinates that resulted in the Policy violations.

9. CONSULTATIONS

For consultations on the Policy application, one shall contact the compliance manager, also by e-mail at: compliance@viva.am .

Additional information about the procedures of the Company's Anticorruption Compliance Program, answers to frequently asked questions, as well as the text of the recommended Anticorruption Clause, are posted on the Single Information Portal of the Company in the section: Anticorruption Policy and Business Ethics

10. REFERENCE DOCUMENTS

10.1. External documents

Item No.	Document name	Internal portal link
	Criminal Code of the RA **Articles 272–277, 296** and **435–445**	
	Code of Administrative Offences of the Republic of Armenia	
	Foreign Corrupt Practices Act 1977 (FCPA) as passed by the US Congress in 1977.	
	The UK Bribery Act 2010 as passed by the Parliament of Great Britain in 2010.	
	US Federal Sentencing Guidelines Manual, §8B2.1., 2010	
	The Bribery Act 2010 Guidance, 2011	
	A Resource Guide to the U.S. Foreign Corrupt Practices Act, 2020	
	Evaluation of Corporate Compliance Programs, U.S. Department of Justice Criminal Division, 2020	
	OECD Anti-Bribery Convention to combat bribery of foreign officials during international commercial transactions 1997.	
	The United Nations Convention against Corruption, 2003.	
	Convention of Criminal Liability for Corruption, 1999.	