



BUSINESS PARTNER CODE OF CONDUCT

This Business Partner Code of Conduct defines basic requirements and responsibilities. Sky Mobile LLC (the Company) reserves the right to reasonably modify requirements should changes arise in the Compliance Program. In this document, VEON means VEON Ltd. (VEON), and any company that is directly or indirectly wholly or majority-owned or otherwise controlled by VEON, including Sky Mobile LLC.

Our Business Partners

As the global economy becomes more interconnected, the Company is committed to building a best-in-class supply chain. As such we require that all of our Business Partners (vendors, suppliers, agents, contractors, consultants, intermediaries, resellers, distributors, third party service providers) take all measures to reduce risk to our business by respecting all applicable laws, observing the highest ethical standards, and by meeting or exceeding the requirements established in the Company's Business Partner Code of Conduct (Code).

Applicability

This Code applies to Business Partners and their subsidiaries, subcontractors, and agents who act as licensed/authorized re-sellers of their products and services to the Company and its affiliated parties. We require Business Partners to demand their next tier of partners to acknowledge principles of this Code.

General Principles

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

Ethical Behavior

The Company and our Business Partners operate in many exciting and dynamic markets; places of great opportunities, but also—from both an ethical and an operational standpoint—locations that present considerable risks. The best way to manage these risks is to comply with all applicable laws, including anti-bribery laws of the United States, where VEON, the parent company of Sky Mobile LLC, is listed on the Nasdaq, and the Netherlands, where VEON is headquartered and also listed. Neither we nor our Business Partners will undertake any activity or accept any risk that would result in unethical outcomes, or a violation of applicable laws.

Honest Conduct

We recognize the indispensable value of honest conduct and how it helps our business in the immediate and long term. These are not just words. These are our values. Simply stated: integrity and honesty matter. Doing what is right—under all circumstances—always counts. We will work with our Business Partners on continuous improvement in areas of this Code.



A World Class Leader

VEON has embarked on a journey to become a world leader in the new digital economy, and we will get there in the right way. Integrity is the cornerstone of our culture and being recognized as a leader in values and integrity is a fundamental driver in building the Company's reputation and a foundation of our success. Our Business Partner conduct impacts the Company's reputation. A Business Partner that fails to adhere to the standards of the Code will not be viewed favorably by the Company when awarding further work and may result in the termination of some or all business relations.

Taking it a Step Further

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

Due Diligence Process

The Company conducts appropriate, risk-based due diligence when selecting Business Partners. All Business Partners must undergo and successfully complete anti-bribery due diligence prior to engagement. Business Partners are required to cooperate with the Company's due diligence process and will accurately complete all questionnaires, including providing requested documentation and transparent information related to company ownership and affiliated parties.

Compliance with local law and regulations

Business Partners will comply with all relevant laws, regulations, and standards in the countries in which they operate. Where the applicable laws and Code address the same subject and are not in conflict, the highest standard will apply. Should any Code requirement conflict with applicable laws, the highest standards consistent with applicable local laws will apply.

Bribery and Corruption

The Company will not tolerate any form of corruption or bribery.

The Company strictly prohibits corruption, bribery, kickbacks, fraud, theft, extortion and embezzlement of any kind. All of the Company's Business Partners must comply with all applicable anti-bribery laws and maintain accurate books and records that correctly reflect their transactions and contain no false or misleading information. Business Partners will not give to, offer to give to, request from, or agree to accept money or anything of value from anyone, directly or indirectly through another party, to gain an improper advantage related to the Company.

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

Gifts and Hospitality

In addition, Business Partners will not, directly or indirectly, offer gifts, hospitality or other benefits to the Company's employees or representatives with the intent to improperly influence them and will not offer to the Company's employees any gifts or hospitality, regardless of amount, during contract negotiation, bidding, tender, or award.



Confidentiality and Data Security

Business Partners will keep confidential any information relating to the Company's customers, business activities, contracts, projects, financial situation, or performance unless specific written permission is obtained from the Company. Business Partners will protect the reasonable privacy expectations of persons with whom they do business. Business Partners will comply with privacy and information security laws and regulatory requirements when personal information is collected, processed, and transmitted. Business Partners will ensure customer data is kept secure and customer privacy is not breached. Business Partners will maintain appropriate data security and ensure that its data security systems are secure and that their employees who interact the Company's data and customer data are properly supervised.

Anti-competitive Behavior

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

Conflicts of Interest

Business Partners will report to the Company any actual, potential or perceived conflicts of interest that may be relevant to the Company. A "Conflict of Interest" means any circumstance – potential, actual, or perceived – that might cause a party to prioritize their financial or personal interests or might cause that party to be biased in their business judgments, decisions and actions. Business Partners must avoid all conflicts of interest that may adversely influence business relationships.

Intellectual Property

Business Partners will respect intellectual property rights and will transfer technology in a manner that protects intellectual property rights.

Money Laundering

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

Prohibition on Oral Contracts

The Company prohibits oral contracts with its Business Partners. All terms and conditions of the services offered or goods that are delivered for the Company shall be agreed prior to engagement and put in writing.

International Trade and Economic Sanctions

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

Human Rights

Business Partners will respect and promote universal human rights as stated in the United Nations' Universal Declaration of Human Rights. Business Partners will not aid in any human rights abuses of any kind and will respect the personal dignity, privacy and rights of individuals at all times. Business partners will not tolerate



any unacceptable treatment of employees, such as but not limited to mental cruelty, physical abuse, mistreatment of persons with disabilities, slavery and sexual harassment.

Forced Labor

Business Partners will not use any form of forced labor, debt bondage, or involuntary and compulsory labor. Business Partners will not require employees to surrender any government-issued identification, passports, or work permits as a condition of employment. Business Partners must ensure the work relationship between the worker and Business Partners is freely chosen and free from threats, intimidation, or coercion.

Child Labor

Business Partners will not use child labor. Where the applicable laws do not establish the minimum legal age for employment, “child” means anyone younger than 15 years of age. This minimum employment age is laid down in several conventions of the International Labor Organization (ILO).

Open and Honest Engagement

Business Partners will support open and honest engagement between employees and management without fear of retaliation, reprisal, intimidation, or harassment and recognize, as far as legally possible, the right of free association of employees.

Non-discrimination

Business Partners will commit to providing a workplace that is free of harassment and unlawful discrimination. Business Partners will not engage in discrimination based on any legally protected class or age, race, color, ethnicity, indigenous status, national origin, gender, gender identity or expression, sexual orientation, disability, pregnancy, medical condition, religion, social origin or status, political affiliation, trade or union membership, or marital or veteran status in hiring or employment practices, such as promotions, rewards, and access to training.

Employment Conditions

The employees of all Business Partners will have an employment contract that defines the terms and conditions of their employment. Subject to local legal requirements, the contract, at a minimum, will provide fair remuneration at the applicable national statutory minimum wage and comply with the maximum number of working hours laid out in the applicable laws. Further, employees will be treated with respect and dignity. Physical, psychological, or verbal abuse, harassment, threats, or other forms of intimidation are strictly prohibited.

Health and Safety

In accordance with international standards and national laws and regulations, Business Partners will provide a healthy and safe working environment. Health and safety obligations will be applied to parties under the Business Partner’s control, including employees and contractors working on the Business Partner’s premises. All work-related fatalities and incidents resulting in near fatal injury that occur on the Company premises or in relation to activities being carried out specifically for the Company must be reported.

Accident and Emergency Readiness



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

Sanitation

Business Partners will provide facilities and amenities, including employee accommodation when applicable, which are hygienic, safe and meet the basic needs of employees.

Environment and Pollution Prevention

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

Conflict Minerals

Business Partners will take reasonable efforts to avoid in its products the use of raw materials which are directly or indirectly financed by armed groups who violate human rights.

Accurate and Complete Records

Business Partners will not falsify records or mispresent conditions or practices.

Program for Compliance with this Code

Business Partners will strive to maintain a program or system to comply with all topics of this Code. If one does not exist, the Business Partner should develop a program or system in order to mitigate operational risks related to this Code. The underlying principle is to facilitate continuous improvement.

Reporting

Business Partners are required to promptly report any suspected or known violations to this Code. If you have questions about this Code or believe that someone may have violated it, please contact the Company's Compliance department at compliance@veon.com. Alternatively, you may submit a question or concern at www.veon.com/speakup. All reports are duly reviewed and, if appropriate, investigated. The Company will not tolerate retaliation against any person who is trying to do the right thing by raising a concern. A person who makes a good faith report about potential misconduct who experiences retaliation or other adverse action for raising a concern should report this immediately via the channels identified above.

Annual Corporate Responsibility

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