

About MegaFon	14–35
Strategic report	36–81
Sustainability	82–109
Corporate governance, securities, and risk management	110–147
Financial statements and appendix	148–226

Ethics and human rights

Ethical business conduct

We are committed to the highest standards of business ethics and adhere to the principles of integrity, openness and transparency in everything we do.

MegaFon and its subsidiaries are governed by its Code of Ethics and Corporate Conduct, articulating the key principles and rules of business conduct for our employees and members of the Board of Directors. The Code outlines the Company’s position on corruption, discrimination, conflicts of interest, and inappropriate behaviour, and specifies the requirements to promote legal compliance, integrity, equal rights and informational transparency.

 [Our Code of Ethics and Corporate Conduct](#)

We have in place a 24/7 Direct Line through which our employees and other stakeholders can receive guidance on compliance with the Code of Ethics and Corporate Conduct (such as, on whether a particular action is considered suspect) or can discreetly (and, if required, anonymously) report any suspected breaches.

 [Contacts of MegaFon’s Direct Line channels](#)

Respect for human rights

MegaFon is committed to respecting human rights in line with both Russian and international law. MegaFon and its subsidiaries have a zero tolerance policy towards any forms of discrimination or harassment. According to its Code of Ethics and Corporate Conduct, the Company strictly adheres to the principle of non-discrimination against employees on grounds of gender, sexual preferences,

race, age, skin colour, ethnicity, language, origin, marital, social, or official status, place of residence, religious views, beliefs, membership in (or failure to join) particular public associations or social groups, or any other circumstances unrelated to the employee’s professional performance.

Customer privacy

We respect our customers’ right to privacy and strive to ensure proper protection of their personal data in our possession. We provide communication secrecy, guaranteeing the privacy of telephone conversations and messages for our subscribers, as well as the privacy of data transmitted over MegaFon’s communications networks. MegaFon’s Regulations on Personal Data

Processing govern all aspects of personal data protection. Employees who have access to personal data are required to rigorously comply with these Regulations.

 [Our Regulations on Personal Data Processing](#)