



telelink
BUSINESS SERVICES



ANTI-CORRUPTION POLICY

TELELINK BUSINESS SERVICES GROUP

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1. Purpose of this document

Telelink Business Services Group (for short: TBSG or the Company) is committed to ethical business practices and we expect our employees and the employees of our partners to conduct business with high ethical standards and in compliance with the law.

Telelink Business Services Group only does business with trustworthy and ethical partners.

In our daily dealings with others, our actions individually and collectively create and sustain our reputation. That means making business decisions and taking appropriate actions that are ethical and in compliance with applicable legal requirements. Failure to comply with anti-corruption law and regulations can have very serious consequences both for Telelink Business Services Group and for the individuals concerned.

Company's employees must therefore take great care to exercise good judgement at all times and should never put themselves or others into a position that may violate this Policy or applicable anti-corruption law provisions.

The main purpose of this Policy is to ensure that Telelink Business Services Group **does not tolerate** bribery and corruption and that approach is applied throughout the organization.

This Policy also aims to provide employees with guidance to how to handle various situations relating to bribery and corruption issues.

The purpose of our Anti-Corruption Policy (the "Policy") is to help ensure compliance by Telelink Business Services Group, its subsidiaries and affiliated domestic or foreign companies with the applicable local, regional, and European legislation.

2. Scope and application

This Policy applies equally and with equal weight to all employees of Telelink Business Services Group, including for the employees of each company in which Telelink Business Services Group controls more than fifty percent (50%) of the voting shares, regardless of the country in which the business is conducted.

The Policy also applies to all third-party service providers. Partners shall conduct themselves with high ethical standards and comply with all applicable anti-corruption laws. No partner shall, directly or indirectly, promise, authorize, offer, or pay anything of value to any government official to improperly influence any act or decision for the purpose of promoting the business interests of Telelink Business Services Group.

Providing improper gifts, payments, or items of value to Government Officials could seriously harm the Company's reputation and could imperil its future. All of us and any third party acting on our behalf must refrain from any conduct which may be considered corrupt.

3. Terms and definitions

What is a bribe?

The legal definition of Bribery and Corruption may vary depending on which country you are in, however the fundamental principles apply universally: **A bribe is an inducement or reward offered for the purpose of improperly obtaining or retaining some form of advantage or value;**

It is important to note that a Bribe is not just the giving of a cash payment. Bribes can take many forms: a gift, an advantage, support for a campaign or organisation, or potentially anything which can be deemed of value to a person or organisation.

The more common types are listed below:

- lavish/ excessive gifts, entertainment or hospitality given the circumstances (e.g., iPhones/ laptops/ designer bags or other high value ticket items);
- unwarranted rebates or excessive commissions over and above those which you would normally expect to pay in such a transaction (e.g., to sales agents or marketing agents);
- unwarranted allowances or expenses (e.g., sending the 'customer' on unnecessary 5* trips, or giving them excessive cash allowances);
- Political/Charitable contributions on behalf of third-party organizations.

In the context of our Anti-Corruption Policy, this means that neither Telelink Business Services Group, nor our Service Providers may promise, offer, pay or authorize the payment of money or anything of value, directly or indirectly, to domestic or foreign Government Officials or Government Officials' Family Members in an attempt to influence Government Officials to obtain or retain business or secure any improper advantage for the Company.

For purposes of this Policy, "Government Official" means:

- Any official or employee of a government, or any department, agency or instrumentality thereof (including members of the legislative, executive, judicial, or administrative branches, and of any level of government, including provincial, local, municipal, state, or federal);
- Any official or employee of any government-owned or operated business;
- Any person acting in an official capacity for or on behalf of a government or a governmental agency or instrumentality;
- Any political party, party official or a candidate for political office.

Government Officials include not only elected officials, but also consultants who hold government positions, employees of companies owned by governments, and any person holding a diplomatic passport.

"Family Member" means a parent, spouse, child, sibling, uncle or aunt.

4. Prohibited activities

Specifically, neither we nor those we retain may engage in the following prohibited activities:

Bribes: Giving, promising, or offering to give, or authorizing the giving of money or anything of value to any Government Official or Government Official's Family Member with the intent to obtain or retain business or secure any improper advantage on the Company's behalf. It does not matter whether the gift or payment is called a "bribe."

There is no minimum amount or threshold of value to be exceeded before such a gift or payment becomes illegal if there is an intent to influence the Government Official to obtain or retain business or secure any improper advantage. "Commissions", "tips", "gratuities" and "gifts" are all prohibited if they are offered or made to Government Officials directly or indirectly in an attempt to corruptly influence them to make decisions which benefit us.

Political Contributions: Making contributions to political parties or officials to obtain their support for executive, legislative, administrative or other action that may be favorable to the Company.

Third-Party Payments: Giving, promising, or offering to give, or authorizing the giving of money or anything of value to a third party when there is knowledge or awareness, or the circumstances suggest a high probability, that the same will be provided to a Government Official to obtain or retain business or secure an improper advantage on the Company's behalf.

If the gift/ hospitality does not fall easily into one of the above categories and you are still unsure whether it may be construed as a bribe, then you should consider the overall nature of the transaction/ dealings and your relationship to the third party and ask yourself:

- Is the benefit I am giving or receiving reasonable and justified in the circumstances?
- If I had to disclose these to my line manager or if they were leaked to the media, then these would not embarrass either Telelink Business Services Group or me?
- If the answer to both these questions is clearly "NO" then this may indicate that these would be acceptable.

5. Payments AUTHORIZED with Approval

Payments AUTHORIZED with Approval, as set forth below:

- Accordingly, no such arrangements or expenditures may be provided without the prior approval of the Senior Legal Advisor.
- Small Gifts. Under limited circumstances, infrequent, modest, and culturally appropriate small gifts to Government Officials may be appropriate. In all cases, any small gift to a Government Official must have the prior approval of the Senior Legal Advisor.
- Telelink Business Services Group does not prohibit normal and appropriate hospitality (given and received), if it is reasonable and justified in the circumstances.

6. Requirements and Responsibilities

The Company has appointed the members of the **Business Process Management Team** to act as an **anti-bribery compliance function**, and as such to oversee the Policy and the Company's compliance program designed to ensure compliance with the Policy and related processes and procedures. All matters concerning this Policy will be consulted with a **Senior Legal Adviser** when applicable.

The **anti-bribery compliance function** reports to the Executive Director.

All contracts with Service Providers must follow the due diligence and approval procedures found in the Telelink Business Services Group for engaging suppliers and Third-Party Service Providers. Our agreements with Service Providers contain specific anti-corruption provisions to ensure compliance with our anti-corruption policies.

If you are approached by any person, governmental or non-governmental, seeking a corrupt payment or attempting to arrange a corrupt payment, or if you learn of any potential violation of this Policy, you must immediately report the matter by sending an email to Ethics@tbs.tech. If you have any concerns about your anonymity, you can report the matter in written to the address of the Company to the attention of the Ethics Commission.

All Telelink Business Services Group employees must declare of all applicable hospitality and gifts offered and received in accordance with the boundaries as prescribed. This states the level at which gifts and hospitality should be reported and the approval requirements for both giving and acceptance.

Questions about this Policy or about a specific transaction should be addressed to the **Business Process Management Team**.

7. Reporting and penalties

The Company expects the strictest compliance with these procedures. All Telelink Business Services Group employees must declare of all applicable hospitality and gifts offered and received in accordance with the boundaries as prescribed.

This states the level at which gifts and hospitality should be reported and the approval requirements for both giving and acceptance. Any violation of these anti-corruption provisions is punishable by criminal fines, imprisonment, or both, in the case of an individual, and fines in the case of companies.

Questions about enforcement and suspected violations can be addressed to Ethics@tbs.tech.

Any violation of this Policy by any employee, director, officer, or third party may result in disciplinary sanction, up to and possibly including termination of employment or of the engagement contract.

8. Inadequacy of anti-bribery controls

Where the due diligence conducted on a specific transaction, project, activity, service provider or third-party establishes that the bribery risks cannot be managed by existing anti-bribery controls, and the company cannot or does not wish to implement additional or enhanced anti-bribery controls or take other steps to enable the Company to manage the relevant bribery risks, TBSG will:

- Take appropriate steps to the bribery risks and the nature of the transaction, project, activity, or business relationship to terminate, discontinue, suspend, or withdraw from it as soon as practicable when its existing transaction, project, activity, or business relationship.
- Postpone or decline to continue when its proposed new transaction, project, activity, or business relationship.

Change control

Prepared / Amended current version

Revision	Date	Name, Surname, position
02	17-05-2021	Aleksandra Kamenska, Business Process Architect

Change control

Revision	Date	Change description
01	15-11-2018	New document
02	17-05-2021	Updated as per the requirements of ISO 37001:2016

Current version

Approved by (Name, Surname, position)	Ivan Zhitiyanov, Chief Executive director
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