

Speak Up

Ensuring transparency and openness and promoting Reporting is fundamental; in turn, the making of a Report must be done with honesty and integrity and on an informed basis. NEO PSP Ltd. expects everyone to raise a concern in good faith, failure to which is contrary to NEO PSP Ltd./Banglalink's Code of Conduct (the "**Code**") and will be considered a violation of this Policy.

NEO PSP Ltd. maintains several confidential channels that can be used to raise concerns about potential violations of the law, Banglalink's Code of Conduct, or our policies or procedures. NEO PSP Ltd. will not tolerate retaliation against any person who is trying to do the right thing by raising a concern in good faith.

Confidentiality and Non-Retaliation

Reporters should feel comfortable Reporting Information on Breaches. NEO PSP Ltd. will not tolerate any type of Retaliation including threats of Retaliation and attempts of Retaliation against any Reporter who in good faith Reports Information on Breaches.

Any NEO PSP Ltd. employee who takes adverse actions that can be regarded as Retaliation against others for making a Report in good faith, or otherwise Retaliates or attempts to Retaliate, will be subject to disciplinary action. An employee who believes they have experienced Retaliation for Reporting Information on Breaches, should immediately inform NEO PSP Ltd./Banglalink Compliance, Investigations, Legal, or Human Resources.

Effective Reporting

NEO PSP Ltd. encourages Reporters to provide as much information as possible when making a Report. Providing detailed information will help NEO PSP Ltd. determine the best way to address the Report. Failure to provide all relevant information may inhibit NEO PSP Ltd.'s ability to conduct a thorough and swift Follow-up.

When making a Report, it is helpful to provide:

- The name, title, and/or department of the person who engaged in the Breach that is the subject of the Report;
- The date when the Breach occurred (month, year, and date, if known);
- Whether anyone has previously raised this Breach to anyone else at NEO PSP Ltd. and what (if any) actions occurred after the Report was raised;
- Whether the Reporter would like to remain anonymous; and
- Contact information, so that NEO PSP Ltd. may follow up with the Reporter as appropriate. Without contact information, NEO PSP Ltd. will not be able to contact the Reporter once a Report has been made.

Reporting Channels

Reports of Information on Breaches under this Policy may be raised through any of several channels, at the choosing of the Reporter. Certain channels allow for anonymity as indicated below.

Reporting Method	Channels
Direct Reports	NEO PSP Ltd. Personnel may make direct Reports to: - A line manager; - Another manager or supervisor; - Representatives of the Compliance, Investigations, Legal, or Human Resources departments.
E-mail SpeakUp Channel	Individuals may Report Information on Breaches or ask questions to Group Investigations

	at compliance@banglalink.net or compliance@muktopay.com ;
Online	NEO PSP Ltd./Banglalink/VEON maintains a confidential case management system that is available worldwide to Report Information on Breaches, accessible at https://www.veon.com/speakup When making a Report online, individuals will have the option to request anonymity (i.e., not to disclose the Reporter's name or contact information), in which case the Reporter
By phone/hotline	Individuals may Report Information on Breaches by telephone. Telephone numbers are available on the https://www.veon.com/speakup webpage The call will be answered by a third-party operator, and the Report will be entered into the case management system for review by NEO PSP Ltd./Banglalink/VEON. When making a Report by phone, individuals will have the option to request anonymity (i.e., not to disclose the Reporter's name or contact information), in which case the Reporter should be aware that no Feedback is possible.