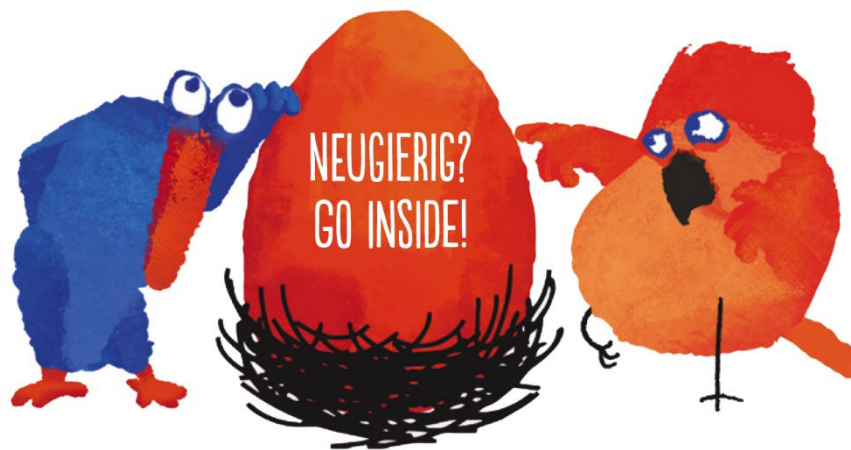




## Code of Conduct



Integrity is the basis of our business.  
honest. fair. transparent.

March 2023

## A Message from our Management Board

A1 Telekom Austria Group is committed to maintaining a high standard of integrity towards all its stakeholders. After all, only honest, fair and transparent actions will ensure the long-term economic success and reputation of the Group. Moreover, respectful and appreciative interaction with one another is an important component of our corporate culture. Our values “team, trust and agility” guide us to realize our vision “Empowering Digital Life” for our customers and society. As part of our ESG ambitions, we actively assume our ecological and social responsibility by promoting more efficient, resource-friendly, and thus more sustainable ways of working and living.

Integrity is the basis of our business. For us, it is important not only to achieve our goals, it is also important HOW we achieve our goals. Ethically and legally impeccable behavior is everybody’s responsibility. For us, integrity is more important than short-term business success. In case of doubt, we would rather forego business than enter into transactions that conflict with legal requirements, our values and our internal guidelines.

Our Code of Conduct applies to all of our employees and to the entire management of A1 Telekom Austria Group. It contains guidelines and principles for conducting ourselves that conform to our values and the law. However, the Code of Conduct will have a positive effect only if we demonstrate our full commitment to it on a daily basis.

Acting with integrity in our daily business life is essential for the sustainable business success and the reputation of A1 Telekom Austria Group. Let us use the Code of Conduct as a guideline for our daily work and ensure that the people in our working environment do the same.

It is purely up to us!



Thomas Arnoldner  
CEO A1 Telekom Austria Group



Alejandro Plater  
COO A1 Telekom Austria Group



Siegfried Mayrhofer  
CFO A1 Telekom Austria Group

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# 1 Introduction

A1 Telekom Austria Group's vision is "Empowering Digital Life". To contribute to a sustainable future through digital services and communication solutions plays a crucial role in this endeavor. "Environmental, Social & Corporate Governance (ESG)" are seen as long-term value drivers.

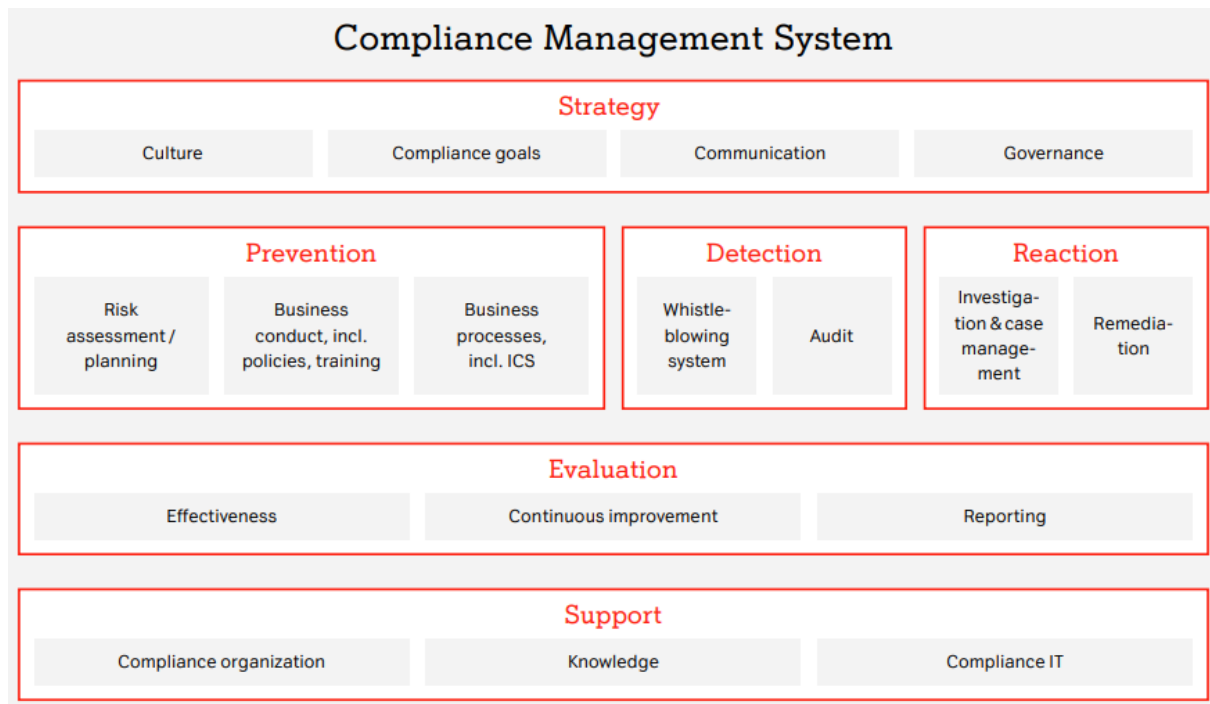
A1 Telekom Austria Group has joined the UN Global Compact. We have thus committed ourselves to implement fundamental requirements in the areas of human rights, labor, environment and the fight against corruption. A1 Telekom Austria Group aligns its activities in order to support the United Nations' Sustainable Development Goals and is committed to the OECD Guidelines for Multinational Enterprises.

The ambitious ESG goals are based on three pillars: A strong commitment to protecting the environment and the climate constitutes the first pillar. Measures to use natural resources efficiently, increase energy efficiency, reduce CO<sub>2</sub> emissions in the Group and in the supply chain, promote the circular economy, and dispose of waste in an environmentally sound manner are the key points of our activities in this area. The second pillar is about initiatives in the field of digital education. We strive to promote access to the internet, information and education and contribute to improving know-how and security for the use of new media. Another focus is on the advancement of women, gender equality and equality of all minorities throughout the Group and in management positions reducing the gender pay gap and promoting social volunteering among our employees. A strong corporate compliance culture forms the third pillar of A1 Telekom Austria Group's ESG strategy, which also includes data privacy and information security, our commitment to human rights and to a sustainable supply chain.

We maintain a best practice and externally certified Compliance Management System<sup>1</sup> (CMS) to ensure integrity and trustworthiness within A1 Telekom Austria Group. Our CMS is suitable to conform to international legal requirements and standards (including the US Foreign Corrupt Practices Act (FCPA), UK Bribery Act, ISO 37301 Compliance Management System, ISO 37001 Anti-Corruption Management System, ISO 37002 Whistleblowing Management System, UN Global Compact, OECD Guidelines for Multinational Enterprises) and is regularly externally audited.

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<sup>1</sup> The A1 Group Compliance Policy, the roles and responsibilities for a risk-oriented implementation of measures and procedures in the areas of prevention and detection of compliance violations, and for the improvement of the A1 Group Compliance Management System are summarized in the description of the A1 Group Compliance Management System published on the A1 Group website at <https://www.a1.group/en/group/compliance-management>.



We adhere to laws, ethical standards, internal guidelines and our values. A1 Telekom Austria Group does not tolerate any form of corruption in its business activities. We disclose possible conflicts of interest and act exclusively in the interests of A1 Telekom Austria Group.

We will be held responsible for any damage we cause by breaking our rules. Misconduct is punished without exception and has disciplinary consequences.

We communicate and cooperate respectfully with each other as well as with our customers, and all stakeholders, and work in a way that they can trust us. Trust is the basis for all cooperation - while gaining trust is often tedious, losing it can happen in an instant.

A1 Telekom Austria Group considers each of our employees as an individual who possesses the ability to:

- assess situations and make decisions,
- take ownership of her or his actions, and
- treat others the way she or he expects to be treated.

### To whom does this Code of Conduct apply?

Our Code of Conduct applies to all members of the Management Board, managing directors, leadership teams, managers, employees and members of the external workforce at all companies in A1 Telekom Austria Group<sup>2</sup>.

We also expect our business partners in the value chain to conduct themselves with integrity and in full accordance with the law and we work towards ensuring that they are contractually obliged to comply with these behavioral requirements.

<sup>2</sup> All companies of A1 Telekom Austria Group that are directly or indirectly controlled by Telekom Austria AG.

## **2 Our Responsibility for People, Society and the Environment**

### **2.1 Empowering Digital Life**

With its vision “Empowering Digital Life”, A1 Telekom Austria Group is entirely at the service of the people. This includes, in particular, helping to shape a sustainable future through digital services and communication solutions.

A1 Telekom Austria Group actively assumes its ecological and social responsibility by promoting more efficient, resource-friendly, and thus more sustainable ways of working and living as well as building digital skills to support equal access to information, knowledge, and education. Only with such expertise and with equal, comprehensive and high-quality access to digital media, services and business models we can develop the full potential of digitalization for society, the economy and the environment.

We encourage our employees to work for the betterment of society through their own personal commitment.

### **2.2 Digital Ethics**

Big data analytics and data driven services play a critical role in digital life. We use artificial intelligence (AI) carefully. We want AI to simplify the lives of our customers and therefore have a positive impact on societal aims such as the UN Sustainable Development Goals. We use a “privacy-by-design” methodology by which data privacy and security safeguards are considered and designed into products, services, processes or projects at each stage of the lifecycle.

### **2.3 Diversity, Equity and Inclusion**

Diversity, equity and inclusion are important elements of the A1 Telekom Austria Group ESG strategy. A1 Telekom Austria Group regards diversity as important criterion for pursuing its corporate objectives. We deliberately foster a work culture in which everyone, regardless of gender, cultural and ethnic origin, sexual and religious orientation and identity, mental and physical abilities, and individual living and working conditions, is treated fairly and can develop and realize their potential. We support a holistic approach to diversity, equity and inclusion. We promote the diversity of our employees in all aspects. Their experience, knowledge and creativity are the basis for our success.

The diversity within the A1 team opens up great potential for the Group. Different competencies, perspectives, and experiences offer plenty of options for learning together and from each other, and thus for finding better solutions for A1 customers, employees, and the company.

A1 Telekom Austria Group aims to ensure equal pay for equal work or for work of equal value between women and men. A uniform group-wide job architecture forms the basis for salary bands that are regularly adjusted on the basis of market data to ensure that pay is in line with the market.

### **2.4 Human Rights**

Our human rights policy is guided by the United Nations Universal Declaration of Human Rights, the United Nations International Covenant on Civil and Political Rights (CCPR), the United Nations International Covenant on Economic, Social and Cultural Rights (CESCR), the Declaration on Fundamental Principles and Rights at Work proclaimed by the International Labor Organization (ILO), the Guiding Principles on Business and Human Rights established by the United Nations (UNGP), the UN Global Compact and the OECD Guidelines for Multinational Enterprise.

Where national law deviates from A1 Telekom Austria Group's commitment to human rights and sets a lower standard, the Group always strives to achieve the higher standard, with the welfare of our employees as our top priority.

We promote respect and diversity without discriminating based on disability, ethnic origin, religion, gender, age, marital status, medical condition, pregnancy, sexual orientation, nationality, economic status or political opinion. We advocate the elimination of discrimination in employment and occupation. We treat each person with dignity and professionalism.

We are committed to the safety, health and well-being of our employees and take the necessary measures to prevent and minimize occupational risks.

To maintain a safe work environment, physical violence and threats in the workplace must trigger an immediate response in accordance with established procedures. We do not allow any kind of harassment, intimidation, insults, threats, unfair accusations, bullying, sexual harassment or other acts of physical or psychological violence that negatively affect the dignity of our employees.

We prohibit the display of images or objects with sexual content, as well as images or objects that could promote hatred, discrimination or stereotyping in the workplace.

We do not interfere with our employees' rights of freedom of association and collective bargaining.

We are against all kind of child exploitation and forced labor.

We adopt measures to eliminate barriers and promote equal access for people with disabilities in our facilities and digital platforms.

We protect the privacy and personal data of customers, employees, distributors, shareholders, and suppliers; as well as the privacy of communication of our users. We promote the freedom of our users to hold and freely share information as part of our communication service.

A1 Telekom Austria Group has no ideological or political affiliation. All employees are entitled to exercise their political rights without being pressured, directly or indirectly, to favor any given political party or candidate. Any such political activity must be undertaken solely on a personal basis, during non-business hours and without making any express or implied reference to A1 Telekom Austria Group, and under no circumstance may involve the use of any of A1 Telekom Austria Group's financial or other resources or assets.

We respect human rights and consider them also in our communication. We conduct awareness campaigns to promote the importance of respect for human rights, workplace inclusion, diversity, gender equality and equality of all minorities.

We are committed to ensuring that our suppliers, distributors and other trading partners comply with the conduct set out in this Code in relation to their employees, including respect for human rights.

## **2.5 Environment**

The preservation of a healthy environment worth living in is important to us.

Digitalization and climate change are the paramount challenges of the 21<sup>st</sup> century. While high-performance and future-proof infrastructure are the foundation of digitalization, information and communication technology can also contribute to combating climate change. A1 Telekom Austria Group has made a commitment to climate protection and active alignment of its business activities.

CO<sub>2</sub> emissions resulting from the energy consumption of the network infrastructure continue to represent the Group's main impact on climate change. A1 Telekom Austria Group is countering this by reducing or stabilizing electricity consumption in order to maintain the most energy-efficient operation possible and by using electricity from renewable sources as far as possible.

In the area of circular economy, the aim is to use as few primary raw materials as possible through measures such as waste avoidance, consistent life cycle management, reduction of plastic in sales and the use of environmentally friendly packaging. Furthermore, resources should serve the purpose of being used for as long as possible.

## **3 Basic Principles of Conduct**

### **3.1 Responsibility for the Reputation of A1 Telekom Austria Group**

The reputation of A1 Telekom Austria Group is shaped largely by the appearance, actions and behavior of every one of us. Illegal or inappropriate conduct by one single employee can do considerable damage to the entire organization.

All employees must respect, preserve and foster the reputation of A1 Telekom Austria Group in their activities.

### **3.2 Our Values**

#### **3.2.1 Team**

In working together, we combine our abilities and strengths in order to meet our customers' expectations. It is important for us to communicate openly and transparently and to act as a team. Everyone's opinion matters – and everyone is encouraged to take action.

#### **3.2.2 Trust**

Through trust, we create an environment that promotes curiosity, openness, and cooperation. We stand by what we say and we keep our promises. We believe in the knowledge and abilities of all employees. We act with integrity in our dealings with each other, with customers, suppliers, and partners.

#### **3.2.3 Agility**

The digital world is not going to wait for us to be ready for it. So, we make decisions and implement them quickly. We learn in our day-to-day work, talking with co-workers and on our internal learning and social collaboration platform. We learn from our mistakes and are constantly striving to take the next step.

### **3.3 Interacting – the “A1 Way of Working”**

We operate in a dynamic environment and are constantly faced with new challenges: be it more demanding or new markets, rising customer expectations, or defending and growing our core business and tapping new growth potential. To keep pace with these dynamics, we put people at the center.

We want to create awareness of the importance of proactively taking the initiative, assuming responsibility and setting ambitious goals. We take risks, share failed attempts and successes, and challenge the status quo. We are curious, look for opportunities and new ideas, and take advantage of learning and growth opportunities.

A1 Telekom Austria Group offers all employees an environment where everyone has the same opportunities and private and professional life are not at odds with each other. By promoting diversity and equality, the Group takes important measures and fosters a culture of mutual respect. To ensure that we always work with impeccable integrity, we have



implemented a compliance management system to support us in adhering to the strict compliance rules.

Inspired by our values “team, trust and agility”, we act as one team. We create a culture of cooperation, in which we are willing to trust and support each other. We value our diversity and include everyone.

People as individuals, working as a team on common goals, the way we lead, make decisions, and in short our corporate culture are gaining in importance over structural factors such as organization, hierarchy and processes. Leadership is evolving into an "enabler" role, a role that creates freedom, acts as a coach, and supports team decisions. Managers define the framework for content and invite people to contribute to shaping it. Within this framework, teams act self-dependent.

Our “A1 Way of Working” is a central aspect of our corporate culture and promotes multifunctional, and thus diverse, agile, adaptable teams. Flexible working is a matter of routine for us. Results are more important than working hours and location. The "A1 Way of Working” requires an expanded and changed understanding of leadership in order to be able to provide clear orientation under new conditions in a more virtual world.

We are passionate in what we do, experimenting and trying new things. We act focused and fast, find ways to overcome obstacles and thus show what is possible.

We are aware of and take seriously the responsibility for our communications and their content. We share only accurate and consistent information and protect confidential information from unauthorized processing and disclosure.

We communicate clearly and honestly in language that is easy to understand and place great value on transparency. We use inclusive language because we value people in their diversity and want to address and involve everyone.

We communicate openly and learn from each other. We listen to each other attentively and share our knowledge and our network. We recognize and use each other's strengths. We give honest and respectful feedback.

We make ourselves accessible to others. We proactively offer support if we see that it might be needed. We don't blame colleagues for mistakes, but see them as an opportunity to learn and develop together.

We treat colleagues, as we want to be treated. We are honest, fair and authentic and we show respect.

We are performance-oriented and are committed to achieving the best possible results. We acknowledge and reward outstanding achievements, while recognizing that individuals have different talents and skills.

Managers support their employees in achieving a balance between their professional and private lives and in taking advantage of what the company offers for the improvement of their work-life-balance and health. This creates a good basis for productive work.

## 4 Conduct Standards for Integrity

Acting with integrity is an absolute must for sustainable success in business. We act in accordance with all applicable laws and regulations and our internal guidelines. In situations where we are not bound by a legal framework, we conduct ourselves just as we would expect from others: honestly, fairly and transparently.

Managers are primarily responsible for conduct with integrity by setting the appropriate tone-at-the-top. It is their responsibility to address the importance of this conduct on a regular basis and to set an example with their own conduct. However, this does not relieve employees from their own responsibility to act ethically and with integrity. Together we must strive to comply with the laws and guidelines and to live up to our values in everyday life.

Recruitment and talent management within A1 Telekom Austria Group are based on qualification criteria and not on personal relationships, cronyism, or nepotism. Our performance management ensures that variable salary components are only paid out if business goals are achieved in compliance with the law and our internal guidelines.

To support our culture of trust and integrity, A1 Telekom Austria Group utilizes a certified compliance management system with clear rules and procedures based on the two main pillars: prevention and detection.

### 4.1 Business Relationships

Dealings with our business partners are characterized by trust and fairness. Our business decisions must not be influenced by private interests and personal advantages.

#### 4.1.1 Business Relationships with Customers

The image of A1 Telekom Austria Group is formed by the way we interact with our customers. Therefore, we observe all legal and internal regulations and treat our customers, as we would like to be treated ourselves.

We win contracts fairly, based on the quality and price of our innovative products and services. Accordingly, our contracts are not won by offering, promising, or granting illegal benefits to public sector employees or decision-makers in private industry. We follow strict rules with regard to gifts and invitations to business meals and events.

If we are asked by public sector employees or decision-makers in private industry to grant illegal benefits or we are offered such benefits to influence our decisions, we inform our managers or report the incident to a compliance manager (for a contact list, see [www.A1.group/compliance](http://www.A1.group/compliance)) or to the A1 Telekom Austria Group [tell.me-whistleblowing portal](http://tell.me-whistleblowing.portal).

#### 4.1.2 Business Relationships with Competitors

A1 Telekom Austria Group acknowledges that free competition is a fundamental element of the market-based system. Fair, transparent conduct on the market ensures the competitiveness of A1 Telekom Austria Group. We respect national and international anti-trust law. We do not engage in price fixing or illegal market agreements with competitors and we do not enter into agreements or deals with regard to issuing sham offers.

In our activities with associations or interest groups, we pay special attention to adhering to the conduct guidelines of anti-trust law. If we are aware that other participants are violating anti-trust law in such bodies or within the scope of association events, we will immediately withdraw from these bodies and we inform our direct manager or report the incident to the legal department, the compliance manager or the A1 Telekom Austria Group [tell.me-whistleblowing portal](http://tell.me-whistleblowing.portal).

We do not disseminate false information about our competitors' products and services or attempt to gain a competitive advantage in other unfair ways. In particular, we are against unlawfully obtaining information on our competitors.

### **4.1.3 Business Relationships with Suppliers**

We maintain trusting, fair business relations with our suppliers and in return expect the same from our suppliers.

Our procurement procedures comply with the laws and regulations of the countries in which we operate. Procurement is responsible for competently procuring goods and services at the best possible conditions. Bypassing of purchasing can lead to disadvantages for A1 Telekom Austria Group. Therefore, all purchasing regulations must be strictly observed and complied with.

When passing on internal and confidential information to suppliers and business partners, we ensure that this is done only in accordance with the need-to-know principle and only within the framework of an information flow coordinated with purchasing. Under no circumstances may information be passed on to business partners that could negatively influence the desired outcome of negotiations. The close cooperation with suppliers that is often necessary does not change the fundamentally different interests.

With all its suppliers, A1 Telekom Austria Group works toward upholding legal anti-corruption regulations and integrity standards throughout the supply chain. Whenever possible, A1 Telekom Austria Group prefers to work together with suppliers that are environmentally friendly and socially responsible. Our suppliers are committed that they and the entire supply chain will comply with the provisions of the International Labor Organization (ILO) regarding the rights of workers and their working conditions (such as, in particular, the observance of human rights, the prohibition of child and forced labor, minimum standards in the area of occupational health and safety, and the guarantee of adequate remuneration).

Through transparent awarding and documentation of contracts as well as strict approval processes, we ensure that no sponsorship or donation activity, consulting assignment or lobbying activity violates applicable regulations.

Our business decisions are made solely in the interests of A1 Telekom Austria Group; personal interests are put aside. In making business decisions, we cannot allow ourselves to be influenced by suppliers that offer or promise us improper benefits and we will not accept such benefits if they are offered to us. Similarly, we do not request that our suppliers grant us any improper advantages.

We wish to avoid any possible perception that our business decisions have been influenced by advantages granted to us. If we are uncertain of whether we can accept a gift, an invitation to a business meal, or an invitation to an event by a supplier, we ask our manager, a compliance manager, or send an e-mail to: "[ask.me@A1.group](mailto:ask.me@A1.group)".

As part of the business partner selection process, we conduct a risk-based, documented business partner integrity check.

A1 Telekom Austria Group places high demands on the integrity of business partners, which are also incorporated into contractual agreements. We do not work with business partners who or whose acting persons have attracted attention in the past with regard to non-integrity or unlawful business conduct (especially corruption), or we establish measures to ensure integrity and lawful conduct.

If we are offered, promised, or granted prohibited advantages, we inform our direct manager or report the incident to a compliance manager or to the A1 Telekom Austria Group [tell.me-whistleblowing portal](#).

## **4.1.4 Relationships with Third Parties**

### **4.1.4.1 Capital Market**

A1 Telekom Austria Group is committed to compliance with the Austrian Corporate Governance Code and to responsible corporate management and supervision aimed at sustainable value creation.

Communication with the capital market is open and transparent. We are committed to the principle that shareholders should be treated equally under equal conditions.

### **4.1.4.2 Donations and Sponsoring**

As a responsible member of society and within the scope of legal and financial possibilities, A1 Telekom Austria Group supports education, science, social and environmental initiatives with financial and donations in kind.

Financial and donations in kind are not granted to individuals, private bank accounts, political parties, or organizations with close ties to political parties. This also applies to organizations that could damage the interests or the reputation of A1 Telekom Austria Group.

All sponsoring activities require appropriate, demonstrable communication and marketing services from the sponsoring partner and are processed transparently.

### **4.1.4.3 Media**

A1 Telekom Austria Group respects the independence of journalistic reporting. For this reason, under no circumstances do we attempt to influence journalistic reporting by placing advertisements or providing free services on a long-term basis or by any other means.

We do not place advertisements in the media of political parties or politically related organizations.

### **4.1.4.4 Business Partner Due Diligence**

For A1 Telekom Austria Group, it is important to work only with those partners that respect the rule of law and human rights and act with integrity. Therefore, we perform a risk-based due diligence with third parties.

A1 Telekom Austria Group takes all necessary measures to prevent money laundering and terrorist financing within its scope of influence. A1 Telekom Austria Group complies with all embargo and sanctions regulations applicable to A1 Telekom Austria Group.

## 5 Handling Information

Confidential information of any kind obtained in the course of professional activities - including information outside one's own field of activity - may neither be used for the pursuit of one's own interests nor made accessible to unauthorized persons. We have put in place rules, procedures and controls for the protection of confidential information.

As a transparent company, we place great importance on correct and truthful reporting. This applies equally to our relations with the capital market, employees, customers, business partners, as well as with the public and all official authorities.

Only members of the management board, employees of the press offices or authorized employees speak on behalf of A1 Telekom Austria Group. Communications Officers and all those who speak on behalf of the company are aware that everything they say in public represents the company.

All information used, obtained, produced or developed by our employees during the performance of their duties is the property of the company.

### 5.1 Data Privacy

We are aware of the highly sensitive nature of the personal data provided to us by our customers, employees, shareholders and suppliers and do our utmost to protect these data. Each one of us is responsible for maintaining this confidentiality within the scope of our tasks.

We collect and process personal data in accordance with European and national data protection regulations, in particular the General Data Protection Regulation (GDPR), national data protection laws and the specific provisions of national telecommunications laws. In addition, we collect, process and use personal data only to the extent necessary for legitimate purposes. Comprehensive information about the use of customers' data and about data privacy in general, is available to our customers at any time.

### 5.2 Data Security

Data security is very important to A1 Telekom Austria Group. It has considerable influence on the success of our business and our public image. Therefore, we protect the confidentiality, availability, integrity and authenticity of company data and personal data with all available, suitable and appropriate technical and organizational means against unauthorized access, unauthorized or improper use, loss and premature destruction, unplanned, unwanted or unauthorized modification, compromising, theft, manipulation and unavailability. Each of us is, within the scope of her/his duties, responsible for protecting our company's IT systems and the information stored in them.

### 5.3 Maintaining Confidentiality

In addition to the organizational and technical measures for data privacy, each one of us has the obligation to maintain operational and business secrets. Information of this nature must be safeguarded and is communicated to persons within the company only if they need it for their professional tasks. This also applies to information in which contractual partners of A1 Telekom Austria Group have confidential interests, particularly if this is contained in a special confidentiality agreement.

For conversations or telephone calls with colleagues in public or in the mobile office, we always take care to keep information confidential. In addition, we do not let outsiders view our business documents.

The obligation to maintain secrecy also continues without limitation after the employment relationship has ended.

## **5.4 Dealing with Insider Information**

As a listed company, Telekom Austria AG is subject to the strict requirements of the capital market regulation.

We are aware that trading in securities and derivatives and providing recommendations while taking advantage of insider information, cancelling or changing an order for a trade or recommending doing so while taking advantage of insider information and disclosing insider information without operational necessity is prohibited and will be punished.

Insider information is publicly unknown, precise information that directly or indirectly affects one or more issuers of financial instruments or one or more financial instruments and which, if publicly known, would be likely to significantly influence the price of such financial instruments or the price of derivative financial instruments related thereto.

All information to which the stock price might react is strictly confidential. Such information may be disseminated only documented and within the framework of operational necessities.

## **5.5 Financial Integrity**

Within the scope of our professional tasks, we ensure that the books and records we produce are complete and correct and give a true and fair view of the economic and financial situation of the company, that every transaction or expenditure is reflected appropriately and that they are produced in time in accordance with the currently applicable rules and standards. We are thereby guided by our internal control system that is designed to assure compliance to all relevant financial reporting requirements including SOX (the Sarbanes Oxley Act).

## 6 Preventing Conflicts of Interest

Our professional actions are guided exclusively by the interests of the company. All employees are called upon to avoid situations in which their personal or financial interests conflict or could conflict with the interests of A1 Telekom Austria Group. We avoid situations that could give any impression that our business decisions are influenced by personal interests.

However, it is not always possible to prevent such conflicts of interest. Without being asked, we fully inform our direct manager about anything that could be a possible conflict of interest as soon as possible.

Special reporting obligations apply to the following conflicts of interest:

- secondary employment for profit and board functions in companies outside the Group,
- internal and external professional relationships with close relatives (children, siblings, parents, spouses, close relatives of spouses and persons living in the same household for at least 1 year),
- equity investments in business partners of more than 5% in the case of participation in the business relationship on the A1 side.

We handle company assets with care. We generally do not use company property for private purposes or for activities that do not serve the purpose of the company.

Everyone is free to share publicly available information with everyone including on social media, but the confidentiality of internal, confidential and secret information must be maintained.

We perceive freedom of expression as an enrichment, but we do not accept any form of bullying, racism or discrimination. This applies to all communication activities and especially to social media.

We do not accept personal rebates from business partners or competitors of A1 Telekom Austria Group that are granted to us with regard to our job at A1 Telekom Austria Group, unless these rebates are offered to all employees or to a large group of employees at A1 Telekom Austria Group.

## 7 Adhering to Standards of Conduct

We want to achieve our business goals and in doing so we act in accordance with the law and with integrity.

Misconduct and violations of conduct standards have serious personal consequences not only for the individual, but also for the entire company. For this reason, misconduct cannot be tolerated. Managers have a special role model function in this regard.

A1 Telekom Austria Group disciplines conscious, unlawful misconduct and violations of internal guidelines consistently, regardless of the rank or position of the person involved.

Information provided by honest employees is one of the most effective ways of exposing misconduct in the company and is therefore an appropriate measure to expose serious risks at an early stage within A1 Telekom Austria Group. Any employee, but also any other person concerned, can report a violation or suspected violation of legal provisions, this Code of Conduct and internal guidelines. Nothing negative will happen to honest whistleblowers who have provided information to the best of their knowledge. This also applies to tips that are not covered by local whistleblower protection laws. The Compliance department is responsible for the operational implementation of whistleblower protection. Whistleblowers can turn to this department if they feel they have been adversely affected by any form of (perceived) disadvantage as a result of the whistleblowing. Whistleblower protection does not apply if knowingly false information is provided to the detriment of the company or its employees.

Whistleblowers should first approach their direct manager for initial support. If a manager receives a whistleblower report, the Compliance Team must be notified of this report and otherwise the report must be kept confidential. Alternatively, information can be addressed to the responsible compliance manager (for a contact list, see [www.A1.group/compliance](http://www.A1.group/compliance)).

Information can also be provided through the A1 Telekom Austria Group [tell.me-whistleblowing portal](#). If you wish, you can remain completely anonymous. In this case, please use the option to set up an electronic mailbox in the tell.me-whistleblowing portal so that you can remain in contact with the compliance manager anonymously during the investigation.

The details will be investigated and verified confidentially and by persons committed to confidentiality.

Alternatively, information can also be provided to authorities in accordance with the statutory provisions while maintaining the legal protection of whistleblowers.

Anyone who knowingly spreads false information about other employees or business partners is committing misconduct themselves.



## 8 Questions

Concrete questions that come up in daily work and cannot be adequately answered by this Code of Conduct or by the internal guidelines should be discussed with one's manager. Moreover, questions and comments on the Code of Conduct and the Compliance Guidelines can be addressed to the responsible compliance manager.

For any further questions, please contact Group Compliance at [ask.me@A1.group](mailto:ask.me@A1.group).

Contact information about how compliance is organized and more information on the Code of Conduct and the Compliance Guidelines can be found on the intranet and on our corporate website at [www.A1.group/compliance](http://www.A1.group/compliance).

## 9 Related Documents

The conduct requirements are specified in the following A1 Group compliance and ESG guidelines:

- A1 Group Guidelines Anti-Bribery, Anti-Corruption & Conflicts of Interest
- A1 Group Guidelines Data Protection
- A1 Group Guidelines Antitrust Law
- A1 Group Guidelines Capital-Market Compliance
- A1 Group Policy Human Rights
- A1 Group Policy Diversity, Equity and Inclusion
- A1 Group Policy Ethics in Media
- A1 Group Conflict Minerals Policy
- A1 Group Green Electricity Policy
- A1 Group Sustainable Packaging Policy
- A1 Group Purchasing Principles



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HONEST.  
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