



# **A1 Group Code of Conduct**



**Integrity is the basis of our business.  
Honest. Fair. Transparent.**

April 2021

## Foreword

The 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 also an important component of our corporate culture. "Team, trust and agility" are our guiding principles. They guide us to realize our guiding theme "Empowering Digital Life" for our customers and society. The Group actively assumes its 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 guiding principles and our internal guidelines.

Our Code of Conduct applies to all of our employees and to the entire leadership team of the A1 Telekom Austria Group. It contains guidelines and principles for conducting ourselves that conform to our guiding principles 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 the A1 Telekom Austria Group. It's 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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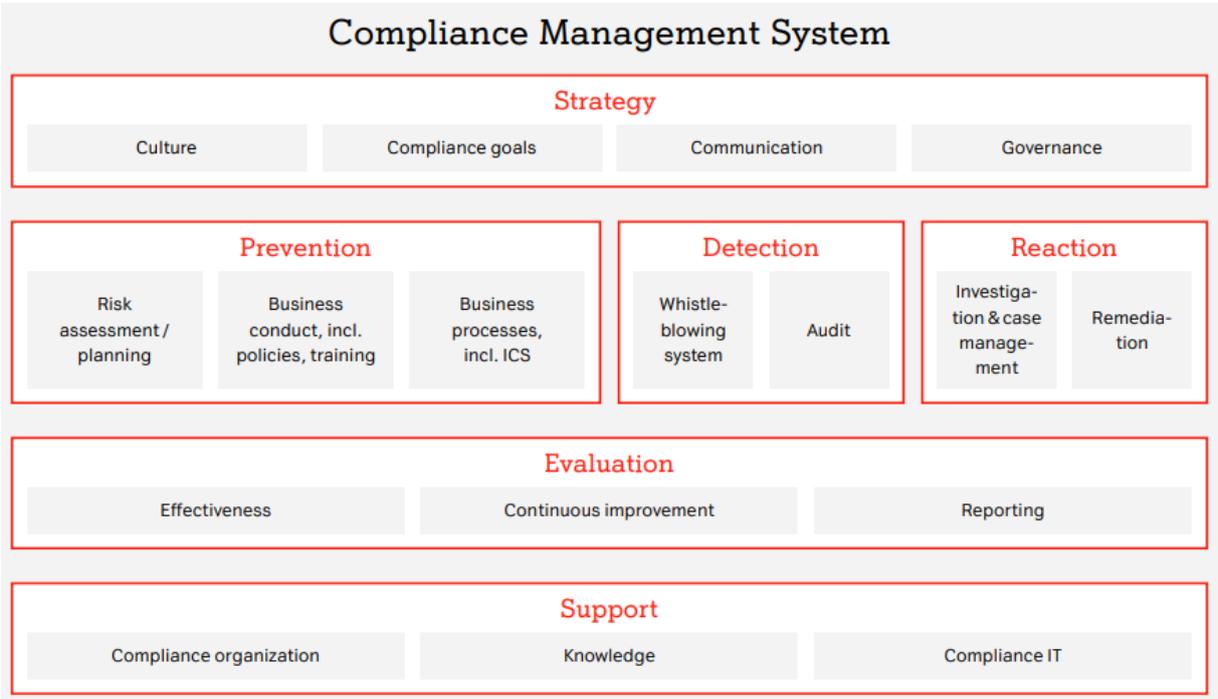
# 1 Introduction

A1 Telekom Austria Group’s common purpose 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.

The 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. The A1 Telekom Austria Group aligns its activities in order to support the United Nations’ Sustainable Development Goals.

The ambitious ESG goals are based on three pillars: A strong commitment in the fight against climate change is forming the first pillar. The second pillar, initiatives in digital education, shows the group as a competent and trustworthy partner in promotion of digital media literacy. The Group acts as a competent and trustworthy partner for promotion of digital media literacy. 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. A clear focus on supporting women, gender equality and equality of all minorities throughout the Group and in leadership positions as well as a strong corporate compliance culture are the third pillar of the A1 Telekom Austria Group’s ESG strategy.

We maintain a best practice and externally certified Compliance Management System to ensure integrity and trustworthiness within the A1 Telekom Austria Group. Our compliance management system meets 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, UN Global Compact) and is regularly certified by external auditors.



We adhere to laws, ethical standards, internal guidelines and our guiding principles. The A1 Telekom Austria Group does not tolerate any form of corruption in its business activities! We adhere to antitrust law, data protection law and capital market law. We disclose possible conflicts of interest and act exclusively in the interests of the A1 Telekom Austria Group.

We will be held responsible for any damage we cause by breaking the 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.

We consider each of our employees as an individual who possesses the ability to:

- assess situations and make decisions;
- take ownership of his or her actions and
- treat others the way he or she 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 the A1 Telekom Austria Group.

We trust our business partners 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.

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

### **2.1 Empowering Digital Life**

With its common purpose "Empowering Digital Life", the 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.

The 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. In this way, we make a positive contribution to social development.

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 privacy and security safeguards are considered and designed into products, services, processes or projects at each stage of the lifecycle.

### **2.3 Diversity and Inclusion**

The A1 Telekom Austria Group regards diversity as an 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 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 among people enriches us all, helps us to better understand the needs of different groups in the markets where we operate and allows us to expand our opinions and perspectives.

We are convinced that diverse teams work more creatively and achieve better results.

### **2.4 Human Rights**

Our human rights policy is guided by the Universal Declaration of Human Rights adopted by the United Nations, the Declaration on Fundamental Principles and Rights at Work proclaimed by the International Labor Organization (OIT) and the Guiding Principles on Business and Human Rights established by the United Nations as well as the UN Global Compact.

We promote respect and diversity in the workplace without discriminating based on disability, ethnic origin, religion, gender, age, marital status, medical condition, sexual

orientation 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 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.

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 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. We promote measures for the efficient use of natural resources and CO<sub>2</sub> emissions reduction and we ensure that waste is disposed in an environmentally sound manner.

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## 3 Basic Principles of Conduct

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

The reputation of the 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 the A1 Telekom Austria Group in their activities.

### 3.2 Our Guiding Principles

#### 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”

The 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 guiding principles, 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 independently.

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"New Ways of Working" at A1 is a central aspect of our corporate culture and promotes multifunctional, and thus diverse, agile, adaptable and less hierarchically structured teams as well as a higher proportion of mobile office and virtual working. "New Ways of Working" at A1 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. The focus shifts more to the results of the work, rendering time and place less important.

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. Only if we learn from our mistakes, we can develop further.

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 the basis for productive employees.

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## 4 Integrity in our Daily Business

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 guiding principles 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 the 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 the A1 Telekom Austria Group [tell.me-whistleblowing portal](http://tell.me-whistleblowing.portal).

#### 4.1.2 Business Relationships with Competitors

The 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 the 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 superior or report the

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incident to a compliance manager or the A1 Telekom Austria Group [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. 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 that is often necessary does not change the fundamentally different interests.

With all its suppliers, the A1 Telekom Austria Group works toward upholding legal anti-corruption regulations and integrity standards. Whenever possible, it 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 activity, consulting assignment or lobbying activity violates applicable regulations.

Our business decisions are made solely in the interests of the 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 superior, a compliance manager, or send an e-mail to: "[ask.me@A1.group](mailto:ask.me@A1.group)".

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

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## **4.1.4 Relationships with Third Parties**

### **4.1.4.1 Shareholders**

The A1 Telekom Austria Group is committed to upholding the Austrian Corporate Governance Code and to managing and controlling the company responsibly, with an eye towards 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, the A1 Telekom Austria Group supports education, science, social and environmental initiatives with financial and material donations.

Financial and material donations 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 the 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**

The 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.

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

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

The 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 applicable embargo and sanctions regulations.

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## 5 Handling Information

We protect personal information and business secrets that become known to us as a result of our business relationships. This also applies to information outside of employees' professional fields of activity. 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 the 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 Protection

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. In the A1 Telekom Austria Group, 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 protection in general, is available to our customers at any time.

### 5.2 Data Security

Data security is very important to the 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 individually 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 protection, 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 the 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.

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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).

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## 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 the 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 superior about anything that could be a possible conflict of interest as soon as possible.

### 6.1 Conflicts of Interest from Secondary Employment

Secondary employment is any activity outside of the primary place of work in which an employee works for a third party to a significant extent – irrespective of whether the work is paid or not paid. This also applies to self-employment as a secondary employment.

We may not engage in secondary employment that is contrary to the interests of A1 Telekom Austria Group, in particular if prohibited by reasons related to competition. Paid secondary employment must be reported and if it impedes one's professional duties in the A1 Telekom Austria Group it can be prohibited by Human Resources. This also applies to management board, supervisory board or advisory board activities in companies outside the A1 Telekom Austria Group.

### 6.2 Private Equity Investments

Employees who influence or can exert influence on the awarding of contracts of purchase must disclose their stake in the company of the business partner to their superior and the Purchasing department if the stake exceeds 5%. This also applies to stakes of close relatives (spouse, partner, children, siblings, parents, close relatives of the partners and persons living in the common household for at least 1 year).

Shares held in companies competing with A1 Telekom Austria Group on the same markets that allow business influence are subject to approval by the Management Board.

### 6.3 Conflicts of Interest with Close Relatives

We report the following employment relationships with close relatives (for definition see under 6.2.) to our manager and Human Resources as soon as possible:

- authority of one to issue instructions to or control the other,
- cooperation in settlement processes or in the management of funds or materials.

We notify our manager and the area involved in negotiations in good time if in the course of contract negotiations, we can exert influence on the part of the company and on the part of the business partners close relatives.

### 6.4 Conflicts of Interest from Functions in Associations

We also report potential conflicts of interest if close relatives or we are involved in a decision-making process both as a body of an association and in a function in the company.

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## 6.5 Handling Company Property

We handle company assets with care. As a matter of principle, we do not use company property for private purposes or for activities that do not serve the company's purpose. The private use of company property is only permitted if corresponding internal regulations provide for this.

Intellectual property such as copyrights, trademarks and patent rights are valuable assets that we protect against unauthorized use.

## 6.6 Using Social Networks and Collaboration Platforms

Employees may only formulate postings in social media as personal opinions, so that these cannot be understood as company opinions. Official statements are only made from A1 Telekom Austria Group accounts and/or by pre-authorized personal accounts (e.g., Management Board members, Leadership Team, press spokespersons).

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

We also comply with internal guidelines (e.g., Guidelines for Workplace) when using our A1 Telekom Austria Group collaboration platforms.

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.

## 6.7 Rebates

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

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## 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.

The 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 and trustworthy 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 the 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.

Whistleblowers should first approach their direct superior for initial support. If a manager receives a whistleblower report, the Compliance Team must be notified of this report. 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](https://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.

Alternatively, in accordance with legal requirements, information can also be provided to authorities.

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

Anyone who intentionally spread false information about other employees is guilty of misconduct himself or herself.

## 8 Questions

Ethical and compliance 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 superior. Moreover, questions and comments on the Code of Conduct and the Compliance Guidelines can be addressed to the 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).



INTEGRITY IS  
THE BASIS  
OF OUR BUSINESS!



YEP:  
HONEST.  
FAIR.  
TRANSPARENT.