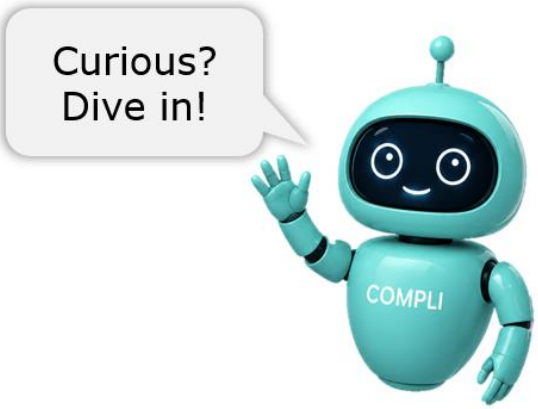
A1 Telekom Austria Group

Code of Conduct



Integrity is the basis of our business.

honest. fair. transparent.

September 2026

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. We 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 foundation of our business. For us, it is important not only to achieve our goals, but 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. When in doubt, we will forgo business rather than enter into transactions that conflict with legal requirements or our internal policies.

Our Code of Conduct applies to all our employees and to the entire management of A1 Telekom Austria Group. It contains policies and principles for conducting ourselves that conform to 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!





Alejandro Plater

CEO A1 Telekom Austria Group

Thomas Arnoldner

Deputy CEO A1 Telekom Austria Group

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1 Introduction

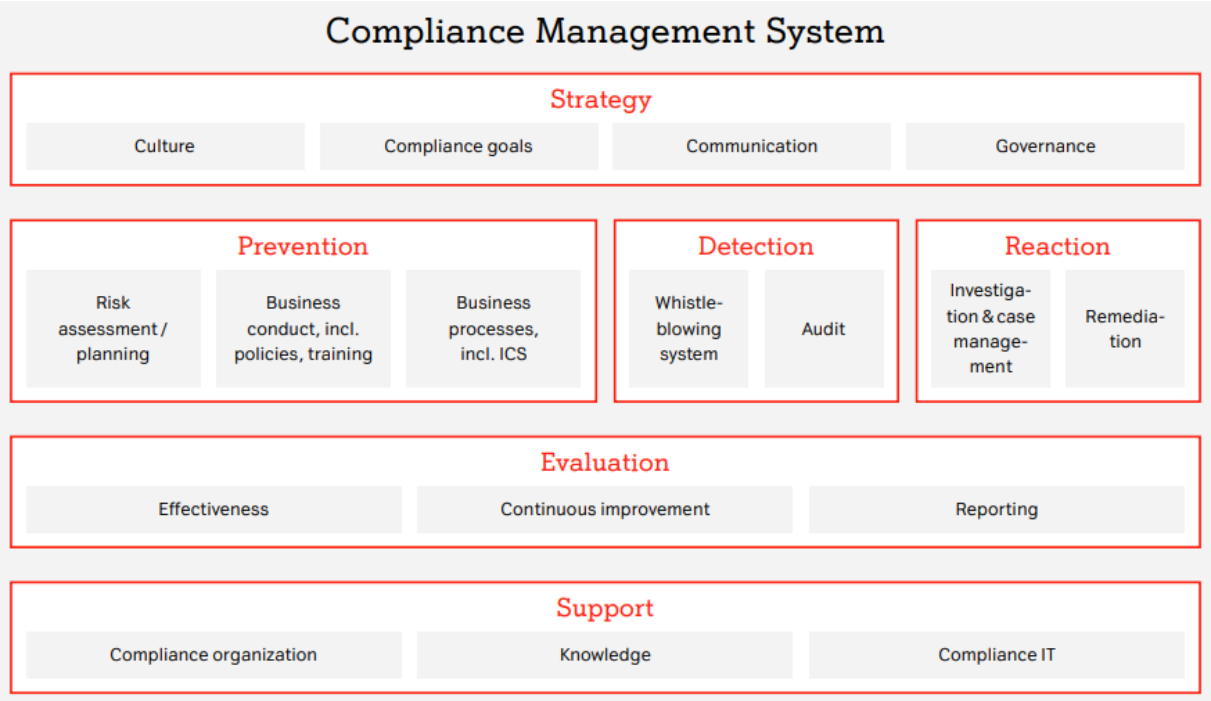
A1 Telekom Austria Group's vision is "Empowering Digital Life". To contribute to a sustainable future, digital services and communication solutions play a crucial role. "Environmental, Social & Corporate Governance (ESG)" are long-term value drivers supporting our overall strategy.

A1 Telekom Austria Group has joined the UN Global Compact. We have therefore 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 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_2 emissions in A1 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.

To ensure ethical business conduct and reinforce stakeholder trust, A1 Telekom Austria Group maintains a best-practice, externally certified Compliance Management System[1] (CMS). Our CMS reflects international best practice and is aligned with legal requirements and globally recognized standards, including the U.S. Foreign Corrupt Practices Act (FCPA), the EU Anti-Corruption Directive, the UK Bribery Act, ISO 37301, ISO 37001, ISO 37002, the UN Global Compact and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

[1] 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://a1.com/compliance/compliance-management-system/.



We adhere to laws, ethical standards and internal policies. 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 earns their trust. 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.

If we observe misconduct, we take action and inform our manager or report it via the tell.me whistleblowing portal of A1 Telekom Austria Group (A1 tell.me whistleblowing portal). Whistleblowers are fully protected at A1 Telekom Austria Group and do not suffer any disadvantages, provided they submit their reports to the best of their knowledge and belief.

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 external workforce members across all companies of the A1 Telekom Austria Group[2].

We also expect our business partners throughout the value chain to act with integrity and in full compliance with all applicable laws and regulations. We therefore strive to ensure that these standards of conduct are contractually embedded in our business relationships.

[2] 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 equal, comprehensive and high-quality access to digital media, services and business models can we 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

Artificial Intelligence (AI) is becoming a natural part of our work at A1 Telekom Austria Group. It supports how we serve customers, run our networks, and streamline internal processes. As expectations for speed and personalization grow, AI helps us meet them by simplifying work, improving decision-making, and creating seamless experiences — always in a safe and compliant way. 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 & security by-design" methodology, under which data privacy and security safeguards are considered and built 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 great potential for A1 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 Enterprises on Responsible Business Conduct.

Where local laws or regulations conflict with or provide a lower standard than A1 Telekom Austria Group's human rights commitments, the Group strives to apply the higher standard to the extent legally permissible, while prioritizing the welfare and safety of its employees.

The Human Rights Officer holds primary responsibility for engaging with external stakeholders and leading the public dialogue on human rights issues within the A1 Telekom Austria Group.

The Human Rights Advisory Board supports the identification and assessment of human rights-related issues and serves as a structured forum for internal coordination and stakeholder dialogue.

We promote respect and diversity without discriminating based on disability, ethnic origin, religion, gender, age, marital status, medical condition, pregnancy, sexual orientation, nationality, social or 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 tolerate any kind of harassment, intimidation, insults, threats, unfair accusations, bullying, sexual harassment or other acts of physical or psychological violence that undermines the dignity safety, or well-being of our employees.

We prohibit the display or distribution of materials that contain sexual content, as well as images or that promote hatred, discrimination or stereotyping in the workplace.

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

We oppose all forms of child labor, forced labor, and human trafficking.

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.

As one of the largest communications providers in the CEE region, A1 Telekom Austria Group also takes responsibility for upholding freedom of opinion and expression. We advocate open access to the internet and enable users to exchange, access, and share information and content freely, within the framework of applicable laws. A1 Telekom Austria Group is politically neutral. 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 expect that our suppliers, distributors and other business partners comply with the principles set out in this Code of Conduct including respect for internationally recognized 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 21st 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_2 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 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 Core 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 Interacting – with Human@Center

To remain relevant in our markets, people working at A1 Telekom Austria Group are crucial to our success. Behavior is how values show up in the workplace. "Human@Center" describes the way, how we would like to work together.

Four areas describe the behaviors we aim to live at the workplace and the environment the company provides: "Take Ownership", "Learn & Innovate", "Team Up Beyond Limits" and "Consciously Care". We set ourselves ambitious goals and take ownership of the outcomes within our sphere of influence. We take ownership of our development, experiment and challenge the status quo. We look for opportunities to collaborate and share ideas and knowledge across silos. We care for people's needs – your own, your colleagues', your customers' and partners' – and act sustainably towards environment and society. 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, A1 Group takes important measures and fosters a culture of mutual respect. To ensure integrity in everything we do, we follow clear compliance standards and responsibly protect confidential information from unauthorized access or use.

We collaborate across functions and roles with respect and openness. We value different perspectives and actively include them in discussions and decisions. Mutual reliability and

accountability guide our cooperation. People as individuals, working as a cross-border team on common goals, the way we lead, making decisions, and in short, our corporate culture are gaining in importance over structural factors such as organization, hierarchy and processes. Leadership evolves into an enabler role, creating clarity, setting direction, and empowering others to contribute. Managers define the framework and expectations, encourage participation, and support teams in taking responsibility. Within this framework, teams act autonomously and are accountable for results.

We are passionate about 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.

We communicate clearly and honestly in languages that are 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 attentively, openly exchange knowledge and perspectives, and build on each other's strengths. We give honest, respectful, and constructive feedback with the intention to support development.

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 Standards of 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 policies. 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. They promote a culture of openness and trust, ensure that employees understand compliance obligations, actively encourage speaking-up by creating psychological safety and identify and manage compliance risks in their area.

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 policies 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 policies.

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 regarding 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 the contact list, pls. refer to our compliance webpage: compliance contacts), tell.me@A1.by or to the A1 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 regarding issuing shame offers.

In our activities with associations or interest groups, we pay special attention to adhering to the policies 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, tell.me@A1.by or the A1 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 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, send an e-mail to: ask.me@A1.by, "ask.me@A1.group" or ask our modern Compliance AI chat bot "Compli", which is easy to access anytime and provides answers in real time.

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 regarding non-integrity or unlawful business conduct (especially corruption), or we establish measures to ensure integrity and lawful conduct.

As part of the business partner selection process, we conduct a risk-based, documented business partner integrity check on risks such as e.g. sanctions and adverse media. Furthermore, systematic screenings against applicable international sanction lists (e.g.: EU, US, UK, UN) are conducted to ensure compliance with trade restrictions and embargoes. In case of red flags in the due diligence process compliance shall be informed.

If we are offered, promised, or granted prohibited advantages, we inform our direct manager or report the incident to a compliance manager, tell.me@A1.by or to the A1 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.

For further details on the prohibition of insider trading, please see chapter 5.4.

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, and valuable 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

This chapter sets out how we handle information responsibly during our professional activities. It covers the lawful handling of personal data, the protection of confidential information, the proper use and ownership of company information, and transparent and truthful communication.

Confidential information of any kind obtained during professional activities - including information outside one's own field of activity - must be handled with care. Such information may neither be used for personal interests nor disclosed to unauthorized persons. To support this, A1 Telekom Austria Group has established rules, procedures and controls to protect confidential information.

The “need to know” principle must always be kept in mind, when transferring data.

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

Only members of the Management Board, employees of the press offices or authorized persons may speak on behalf of A1 Telekom Austria Group. Anyone communicating publicly who speak on behalf of the company is aware that their statements represent A1 Telekom Austria Group.

All information used, obtained, produced or developed by employees in the performance of their duties is the property of the company and must be handled in accordance with applicable laws and internal policies.

We only use approved AI tools on the basis of secure, lawfully used data with clear consent and consistent compliance with data protection and security requirements. We adhere to the requirements of the AI Act. Personal data, internal, and confidential information may only be entered into A1 internal AI tools. Secret data must never be entered into an AI tool.

5.1 Data Privacy

We recognise the highly sensitive nature of the personal data provided to us by our customers, employees, shareholders and suppliers protecting personal data and respecting the privacy of individuals is an important part of A1 Telekom Austria Group's values. Each one of us contributes, within the scope of our role, to treating personal data confidentially and with due care.

We process personal data in accordance with applicable data protection regulations, in particular the General Data Protection Regulation (GDPR), relevant national data protection laws and national telecommunications laws. In addition, we process personal data only for legitimate grounds and only to the extent necessary. Clear and transparent information about how customers' data is used, as well as about data privacy in general, is available to our customers at all times.

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 protected and shared only with persons, who require it to perform their job responsibilities within A1 Telekom Austria Group. (on a 'need-to-know' basis) 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 (see A1 Group Capital Market Compliance Policy).

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 accounting standards. We are therefore guided by our internal control system that is designed to assure compliance with all relevant financial reporting requirements including the Sarbanes Oxley Act (SOX).

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 additionally 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 decision on the A1 Telekom Austria Group side.

We handle company assets with care. We generally do not use company property for private purposes or for activities unless explicitly permitted 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 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 policies 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 policies. 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 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 directly to the responsible compliance manager (for the contact list, pls. refer to our compliance webpage: compliance contacts).

Information can also be provided through the A1 tell.me whistleblowing portal. If you wish, you can remain completely anonymous, secure and encrypted communication is still fully guaranteed.

Whistleblower reports are investigated and verified confidentially by authorized individuals.

Alternatively, concerns may be reported to the appropriate authorities in accordance with applicable legal requirements, while ensuring the statutory protection of whistleblowers.

Those who intentionally spread false information about other employees are guilty of misconduct themselves and may give rise to claims for damages and could be prosecuted in court or as an administrative offence.

8 Questions

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

For any further questions, please contact Group Compliance at ask.me@A1.group. Additionally, our compliance chat bot "Compli" is available via the A1 AI chat — a modern, easily accessible companion for instant support on urgent questions anytime.

Contact information about how compliance is organized and more information on the Code of Conduct and the Compliance Policies can be found on the intranet and on our corporate website.

9 Related Documents

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

- A1 Group Anti-Bribery, Anti-Corruption and Conflict of Interest Policy
- A1 Group Policy Antitrust Law
- Data Privacy Governance Policy
- Information Security Policy
- A1 Group Capital-Market Compliance Policy
- A1 Group Policy Human Rights
- Stakeholder Engagement Guideline
- A1 Group Policy Diversity, Equity and Inclusion
- A1 Group Health, Safety and Wellbeing Policy
- A1 Group Policy Ethics in Media
- A1 Group Purchasing Principles
- Supplier Code of Conduct
- Responsible Sourcing Policy
- A1 Group Conflict Minerals Policy
- A1 Group Green Electricity Policy






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