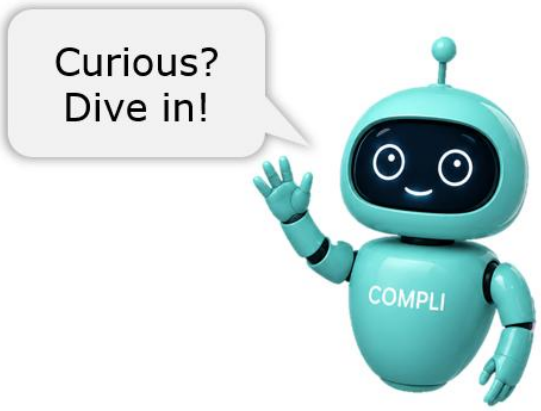
A1 Group Policy
Capital-Market Compliance



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Public

The Most Important Capital-Market Compliance Stipulations at a Glance

Stipulations for all Employees:

- Inside 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. Information is deemed accurate, if its occurrence is more probable than its non-occurrence (more likely than not) and if it is specific enough that conclusions can be drawn about possible effects on the price of the financial instruments concerned. Intermediate stages of a prolonged issue that constitute inside information no longer need to be published on a case-by-case basis. However, all other obligations relating to inside information (such as the prohibition on insider dealing, insider list, statement of undertaking, confidentiality) remain in place. If the price impact expected from a public announcement is very high, the information in question must be classified as inside information even if the probability of occurrence is less than 50%.
- Trading in securities and derivatives and providing recommendations while taking advantage of inside information, cancelling, or changing an order for a trade or recommending doing so while taking advantage of inside information and disclosing inside information without operational necessity is prohibited and will be punished.
- The Capital-Market Compliance Officer, the Head of Investor Relations and the General Counsel must be involved early in circumstances or projects that could lead to inside information.
- The Capital-Market Compliance Officer shall be informed immediately of the occurrence of inside information. The Capital-Market Compliance Officer shall be either consulted during decision-making in connection with possible inside information or otherwise informed immediately of all decisions of the Management Board concerning possible inside information.
- All persons who receive inside information concerning A1 Telekom Austria Group have to inform the Capital-Market Compliance Officer immediately about the date and exact time when they received the inside information, as well as about all personal data required to be included on the insider-list.
- Inside information is subject to confidentiality. The disclosure of inside information is limited to when the disclosure of information is necessary for business operations (need-to-know principle).
- In the case of changes in strategy, M&A transactions with an expected transaction value of more than € 200 million, changes in the Management Board of Telekom Austria AG, an expected deviation in total revenues of more than € 130 million per year or CAPEX of more than € 150 million per year from investor guidance, in the event of a change in the amount of the proposed dividend significantly exceeding the expected value by the capital-market, capital increases, necessary impairments according to IFRS (International Financial Reporting Standards) of more than € 75 million, as well as in the case of deviations from the capital-market expectation in the case of EBITDA or exceptional effects in the case of free cash flow of more than € 75 million per year, it must always be assessed whether inside information exists and whether public disclosure of such inside information is required.

Stipulations for Persons from Classified Units of Confidentiality:

- When joining a classified unit of confidentiality, all persons are to be reported immediately to the Capital-Market Compliance Officer, who will carry out initial capital-market compliance training in the first 14 days after joining the classified unit of confidentiality.
- Persons who have access to inside information shall acknowledge in written form any obligations arising from legal and administrative provisions and declare in written form that they are aware of any sanctions that will be imposed in the event of misuse or improper dissemination of insider information.
- Provided that there are no other relevant blocking periods persons from permanent classified units of confidentiality have permission for trading in shares or other equity-like securities, bonds or other debt instruments of A1 Telekom Austria Group, derivatives or other financial instruments linked thereto only during the defined and communicated trading windows. Trading window is open during the 20-working day period following the disclosure of the yearly, half-yearly or quarterly results respectively. Outside of the defined trading windows, trading in the above-mentioned securities is generally prohibited for members of permanent classified units of confidentiality. Exceptions from the prohibition to trade must be approved by the Capital-Market Compliance Officer. Blocking periods for temporary classified units of confidentiality are defined separately.
- The dissemination of inside information may only take place upon simultaneously notifying the Capital-Market Compliance Officer.
- To protect the confidentiality of inside information, appropriate organizational measures shall be taken.

Stipulations for Managers:

- The Management Board, the Supervisory Board and the entire management of the Telekom Austria AG are aware of their role model function and undertake to create appropriate framework conditions for the implementation of the Capital-Market Compliance Policy and to ensure compliance with the provisions in their own area. They are primarily responsible for promoting a culture of integrity throughout the company.
- In addition, the members of the Management Board and the Supervisory Board of Telekom Austria AG, the management and Supervisory Board of Telekom Finanzmanagement GmbH as well as closely associated persons have to report to Telekom Austria AG (managers.transactions@a1.com) and on the web platform of the Financial Market Authority (FMA) within a maximum of 3 working days after transaction all the transactions in excess of the threshold of € 20.000 per calendar year.
- Manager of permanent classified units of confidentiality must report immediately to the Capital-Market Compliance Officer every new employee of their respective classified units of confidentiality as well as business partners who deal with capital-market relevant projects. Furthermore, they must ensure completeness of the statements of undertaking of their classified units of confidentiality.
- Managers monitor the adherence to these Capital-Market Compliance Policy in their own area and inform the Capital-Market Compliance Officer about the occurrence of misconduct.

Further information is available from the Capital-Market Compliance Officer

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Foreword

In line with our vision "Empowering digital life" A1 Telekom Austria Group sees "Environmental, Social & Corporate Governance" (ESG) as a long-term strategic value driver. A strict compliance with all capital-market regulations is an important part of this.

Share prices are based on expectations, and these are driven by information. Information asymmetry leads to unequal market conditions, violates the integrity of financial markets, and undermines public confidence in securities and derivatives. To prevent this, the European Union and national legislators have enacted strict rules to prevent market abuse, which are the subject of this directive.

Ethical and legal conduct is in the responsibility of each employee. It is a necessary prerequisite for the capital-market, customers, employees and all stakeholders to trust us.

To support this, we give ourselves clear rules defining what is allowed, but also what is not allowed. Of course, we adhere to legal regulations and to our internal rules, the Code of Conduct and the internal policies.

Everyone knows that there cannot be a rule in place for every situation where a decision has to be made. But how do we behave in those cases? The answer is "ethically and with integrity" thus "honestly, fairly and transparently".

1 Introduction

The shares of Telekom Austria AG are admitted to official trading on the Vienna Stock Exchange (ISIN: AT0000720008). Due to the EU Market Abuse Regulation (EU 596/2016 "MAR"), its implementing provisions and the Austrian Stock Exchange Act 2018:

- all members of the Management Board and of the Supervisory Board of Telekom Austria AG, all employees of Telekom Austria AG and employees of our subsidiaries, which are assigned to a classified unit of confidentiality, consultants, and all other persons of business partners of A1 Telekom Austria Group who have potential access to inside information have to be informed on a regular or occasion-related basis about:
  - the prohibition of misuse of inside information,
  - the prohibition of market manipulation,
  - the handling and disclosure of inside information,
  - trading prohibitions and trading windows,
  - the reporting obligations of Management Board and Supervisory Board Members and their closely associated persons concerning Managers´ Transactions,
  - insider-list,
  - the rules for publishing the publication of insider information (ad-hoc publicity),
  - the authorities and area of responsibility of the Capital-Market Compliance Officer and
  - possible civil, criminal or employment law consequences in the event of violations of this Capital-Market Compliance Policy;
- an internal Capital-Market Compliance Policy has to be issued and compliance with it has to be monitored;
- organizational measures have to be taken to prevent misuse or disclosure of insider information.

The organizational measures and the Capital-Market Compliance Policy apply without restriction to

- all members of the Management Board and the Supervisory Board of Telekom Austria AG,
- all employees and leased workers of Telekom Austria AG,
- board members and all employees of our subsidiaries, who are assigned to a classified unit of confidentiality,
- consultants and other persons working for us who have access to inside information on a regular or occasion-related basis.

The ban on insider trading applies to all employees in the entire A1 Telekom Austria Group.

Each employee has to inform a business partner, with whom a contractual relationship is entered into, who will receive inside information on a regular or occasional basis in advance about this Capital-Market Compliance Policy and request a signed statement of undertaking (Annex 3), which is to be transmitted to the Capital-Market Compliance Officer.

The Management Board, the Supervisory Board and the entire management of Telekom Austria AG and of affiliated companies are aware of their role model function and undertake to create appropriate framework conditions for the implementation of this Capital-Market Compliance Policy and to ensure compliance with the provisions in their own area.

2 Definitions

2.1 Financial Instruments

Financial instruments within the meaning of this policy are all instruments within the meaning of Article 4, Section 1 No. 15 of the EU Directive 2014/65/ EU (MIFID II). These include:

- transferable securities;
- money market instruments;
- shares in undertakings for collective investment;
- options, futures contracts (futures), swaps, OTC forward rate agreements, and any other derivative contracts relating to securities, currencies, interest rates or income, emission reduction units or other derivative instruments, financial indices or metrics that can be effectively delivered or settled in cash;
- options, futures contracts (futures), swaps, forward transactions (forwards) and any other derivative contracts relating to commodities that must be settled in cash or that can be settled in cash at the request of either party, without which there is a default or other termination event;
- options, futures contracts (futures), swaps and any other derivative contracts relating to commodities that can be effectively delivered, provided they are traded on a regulated market, through a multilateral trading facility (MTF) or through an organised trading facility (OTF); except for an organised trading facility (OTF)-traded wholesale energy product that must be effectively delivered;
- options, futures contracts (futures), swaps, forward transactions (forwards) and any other derivative contracts relating to commodities that can be effectively delivered and are not used for commercial purposes, show the characteristics of other derivative financial instruments;
- derivative instruments for the transfer of credit risks;
- financial speculations on differences;
- options, futures contracts (futures), swaps, organised trading facility (OTF) forward rate agreements and any other derivative contracts relating to climate variables, freight rates, inflation rates or other official economic statistics that must be settled in cash or can be settled in cash at the request of one of the parties, without which there is a failure or other termination event, as well as any other derivative contracts relating to assets, rights, obligations, indices and measures that are not otherwise mentioned in this section, which have the characteristics of other derivative financial instruments, taking into account, among other things, whether traded on a regulated market, an organised trading facility (OTF) or a multilateral trading facility (MTF);
- emission reduction units consisting of shares whose conformity with the requirements of the Directive 2003/87/EC (Emission Trading Scheme) is acknowledged.

2.2 Inside Information

Inside 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 (price relevance), because a reasonable investor would probably benefit from it as part of its investment decisions.

Information is publicly known if it has been made available to a broad investor audience and thus to an indeterminate group of persons.

For information to be considered accurate it is sufficient that the occurrence of the facts or events can be predicted as more probable than its non-occurrence (more likely than not). The information is determined enough if a conclusion can be drawn about possible effects on the stock price (no matter in what direction). If the price impact expected from a public announcement is very high, the information in question must be classified as inside information even if the probability of occurrence is less than 50%.

Even partial steps taken in a protracted process may themselves constitute inside information and therefore need to be assessed separately. In case of doubt, the Capital-Market Compliance Officer must be consulted.

In a protracted process, only the final circumstances or the final event must be disclosed pursuant to Article 17 MAR. Intermediate stages remain subject to all other obligations relating to inside information, including confidentiality requirements.

Examples of inside information (not an exhaustive list):

- Corporate measures:
  - merging with other companies;
  - acquisition and disposal of other companies;
  - amount of the proposed dividend;
  - exchange offer for other securities;
  - takeover or compensation offers;
  - public offers for sales of listed shares;
  - capital measures, e.g. capital increases, reductions,
  - adjustments (particularly issue prices for new emissions and capital increases);
  - insolvency.
- Business activity of the company:
  - providing and/or granting of licenses or patents;
  - development of new services and new products with significant impact on Group results, that have not yet been officially disclosed to the public
  - court and arbitration proceedings outside the normal course of business;
  - business interruptions;
  - exceptional investments with significant impact on Group results, that have not yet been officially disclosed to the public;
  - exceptional increases/reductions in staff numbers;
  - extraordinary changes in the order status.
- Assets, financial position and results of operations of the company:
  - important financial data (in particular revenues, profit, cash flow);
  - taking exceptional liabilities;
  - significant changes in the cost and price situation.

2.3 Insider

An insider is everyone who has inside information.

A primary-insider is a person who has access to insider information as a member of the management board or the supervisory board of the issuer or otherwise due to their profession, employment, duties or participation in the capital of an issuer.

Primary-insiders are also, for example, lawyers, auditors, tax consultants, PR-agencies, representatives of major shareholders, and persons in the classified units of confidentiality. In addition, individuals who obtain inside information through the commission of criminal activities are also classified as primary-insiders.

A secondary-insider has inside information by chance, from a primary-insider or from another third party and knows or must know that this is inside information. Secondary-insiders are, for example, listeners of a conversation in the elevator or family members of employees of Telekom Austria AG who find relevant notes.

2.4 Market Manipulation

Market manipulations are (not an exhaustive list):

- transactions or purchase or sales orders which give or could give false or misleading signals for the stock price of financial instruments of Telekom Austria AG or influence the stock price in such a way that an abnormal or artificial price level is achieved (therefore not only bogus transactions but also effective transactions);

  Exception: There are legitimate reasons for the transactions/orders and the "permitted market practice" is not violated.

- transactions, purchase or sales orders under false pretense or with the use of any other acts of deception;
- dissemination of information about the media that give or could give false or misleading signals regarding financial instruments, including the dissemination of rumours and false or misleading messages, if the disseminating person knew or should have known that they were false or misleading;
- *cornering* (utilising/securing a dominant position in relation to the offer of a financial instrument resulting in a direct or indirect fixing of the price);
- *marking the close* (purchase/sale of financial instruments at the closing of the stock exchange with the result that investors who are acting on the basis of the closing price are misled);
- *front running* (utilisation of information that allows relatively risk-free profits from transactions with financial instruments, such as the knowledge of an already placed customer order or an upcoming purchase recommendation);
- *scalping* (utilisation of access to the media by submitting an opinion on a financial instrument, previously addressing positions on this financial instrument (e.g. stock price increase) and subsequently taking advantage of the impact of the statement (e.g. sale at a higher stock price);
- freely invented gossip, recommendations or warnings without factual basis (value judgements, opinions, estimates and forecasts are then wrong when they are based on incorrect facts; the factual basis is to be checked as much as possible prior to taking it as a basis for the value judgement, etc.);
- misleading information that is correct in content but allows the recipient to have a false idea of the facts described therein (e.g. a statement in a capital-market prospectus that, as a result of new legislation, a particular product group will be in demand more strongly in the future due to state subsidies (true), but omitting the information that although the product produced by the issuer might appear to fall into the respective product category, it (still) does not meet the criteria for the state subsidy. In line with the traffic concept, it is thus "declared" that one´s product meets the criteria for the state subsidy);
- classic fictitious transactions such as "matched orders" (transactions with orders coordinated in advance by different persons) or "washed trades" (transactions with economically identical contract partners).

3 Legal Provisions on the Prohibition of Misuse of Insider Information and Capital-Market Abuse

The legal provisions on the prohibition of misuse of insider information and capital-market abuse comprise the following:

- engaging in insider trading and the attempt to do so,
- cancellation or modification of an order using insider information,
- recommending or inciting third parties to engage in insider trading,
- unlawful disclosure of insider information,
- market manipulation.

Insider trading occurs when a person possesses inside information and, using the same, directly or indirectly acquires or sells financial instruments to which the information relates, either for their own account or for a third-party account. The use of inside information in the form of cancellation or modification of an order with respect to a financial instrument to which the information relates is also to be regarded as insider trading if the order was issued prior to obtaining the inside information. If a transaction was commissioned prior to the existence of the inside information the execution is not qualified as an insider transaction.

A recommendation to engage in insider trading or the inciting of a third party to do so is to be regarded as existing if a person

- recommends third parties to acquire or sell financial instruments on the basis of an inside information to which the information relates, or
- incites them to make such an acquisition or sale, or
- on the basis of this information, recommends third parties to cancel or change an order relating to a financial instrument to which the information relates, or
- incites third parties to make such a cancellation or change.

Unlawful disclosure of inside information occurs when a person in possession of inside information passes this information on to third parties without operational necessity (need-to-know principle).

The exchange of inside information is permitted if the information flow is necessary for the operation of the business. The rules on confidential sharing of information must also be observed in these cases (see chapter 5).

Passing on recommendations or instigating others after being instigated oneself is also considered unlawful disclosure of inside information if the person passing on the recommendation or instigating others after being instigated oneself knows or should know that the recommendation or instigation is based on insider information.

Anyone who violates these prohibitions is to be penalised. The procedure, nature and amount of the penalty depend on the infringement; in certain serious cases, a judicial penalty is also possible.

Since this offence is an intentional offence, it is sufficient for the insider to seriously consider the realization of the misuse of inside information as possible and to accept it. Secondary-insiders can be punished only if they are aware of the existence of an inside information.

4 Decision-Making on the Existence of Inside Information

The Capital-Market Compliance Officer, the Head of Investor Relations and the General Counsel must be included in preparing the decision about ad-hoc publication of inside information. To enable a thorough and timely analysis, they must be included in an advisory capacity early in circumstances or projects that could lead to the obligation to make an ad-hoc release. The decision about an ad-hoc release is the responsibility of the Management Board of Telekom Austria AG. The ad-hoc disclosure is carried out by Investor Relations.

The Capital-Market Compliance Officer shall be either consulted during decision-making or otherwise informed immediately of all decisions of the Management Board of Telekom Austria AG concerning inside information.

The following triggering events always require consideration as to whether inside information already exists or not and if ad-hoc publication of insider information is required:

- significant changes in strategy,
- M&A transactions with an expected transaction value of more than € 200 million,
- changes in the Management Board of Telekom Austria AG,

- an expected deviation in total revenues from investor guidance of more than € 130 million per year,
- an expected deviation in CAPEX from investor guidance of more than € 150 million per year,
- in the event of a change in the amount of the proposed dividend exceeding significantly the expected value by the capital-market,
- capital increases,
- necessary impairments according to IFRS of more than € 75 million,
- deviations from the capital-market expectation in the case of EBITDA or exceptional effects in the case of free cash flow of more than EUR 75 million per year.

The trigger events are intended as guidance only. The absence of a trigger event does not mean that inside information does not exist. Any other event or circumstance must also be assessed to determine whether it constitutes inside information requiring disclosure.

5 Handling of Inside Information

Any employee who first becomes aware of inside information concerning Telekom Austria AG and who recognises it as such, must report this immediately to the Capital-Market Compliance Officer. If it is unclear whether information is inside information or it may be disclosed, the Capital-Market Compliance Officer must be consulted, and his instructions must be followed.

Even within a permanent or a temporary classified unit of confidentiality, inside information may only be brought to the attention of persons who are professionally involved in the processing of this information (need-to-know principle).

In all cases the disclosure of the information must be limited to a strictly necessary extent and the number of persons concerned with inside information should be kept as low as possible. In case of doubt whether there is inside information or whether the passing on of inside information is permitted, the Capital-Market Compliance Officer must be consulted before the planned dissemination of information. The latter decides independently on the question submitted to him.

Inside information must be treated with strict confidentiality also in the course of internal business transactions with other company units (subsidiaries) (need-to-know-principle).

As soon as inside information has been disclosed, the Capital-Market Compliance Officer must be informed immediately to whom and at what time and date the disclosure was made.

The disclosure of insider information to external persons is only permitted if

- it is necessary for business purposes,
- the disclosure is limited to the absolutely necessary extent,
- the external person – provided he is not already bound to confidentiality by law or professional rules – undertakes under an agreement, prior to receipt of the information, to keep the inside information confidential and not to misuse it, and
- thereafter the Capital-Market Compliance Officer is informed immediately.

Documents and data carriers of any kind (e.g. on hard disks, servers, clouds, data rooms, etc.) containing inside information, must be kept, or safeguarded in such a way that they are not accessible to persons who are not professionally engaged in the processing of this inside information. Cabinets in which such pieces of documentation (documents, external data carriers) are stored must remain locked.

In modern office architecture, members of classified units of confidentiality should choose their workplace in such a way as to ensure confidentiality of inside information. Adhering to a clean desk policy is vital. The immediate surroundings when sharing desks should be restricted to one´s own classified unit of confidentiality. A special focus room should be used for temporary project-related classified units of confidentiality to provide the necessary confidentiality.

Computer programs and data stored on data processing systems on which inside information is processed or stored must be protected by usernames and passwords. Employees who use applications with inside information must fully close confidential processing applications when they leave their screens, making it impossible to access the application and data. Telekom Austria AG employees with network access from home may only save files and programs on protected file server or high security server of Telekom Austria AG. Access to the network must be protected via a password that is known only to the respective employees, and which is in line with the respective security policy (VPN-access, multi-factor authentication). Upon transmission via e-mail, insider information has to be encrypted.

Codenames shall be provided for sensitive projects.

Internal information that is to be distributed to a sizeable number of employees and which might potentially be stock price relevant information, needs prior discussion with the Capital-Market Compliance Officer with respect to its form and content.

The Internet, the Intranet and other internal communication platforms are available to a network of recipients that cannot possibly be limited in advance. It must therefore be assumed that information that is placed in such media will be distributed to the public. It is therefore necessary to check very carefully before every publication to those media whether share price sensitive information might potentially be disclosed and, in case of doubt, the Capital-Market Compliance Officer must be consulted.

Capital-market sensitive publications, press releases, letters to analysts and contacts with analysts and investors must be given, written, or made solely by the Management Board of Telekom Austria AG or, in individual cases, persons empowered by it, from Corporate Communications and Investor Relations, who must contact the Capital-Market Compliance Officer if in doubt whether inside information is involved. With respect to other media contacts, the significance of share price sensitive information must be checked with the utmost care and, if in doubt, discussed in advance with the Capital-Market Compliance Officer.

6 Publication of Inside Information

Telekom Austria AG must immediately notify the public of any inside information directly related to it, irrespective of the trading hours of the stock exchange. All significant changes with regard to already disclosed inside information must be announced immediately after the changes occur.

The publication of inside information takes place simultaneously to the Vienna Stock Exchange and the Financial Market Authority (FMA), and half an hour later to at least 2 news agencies (Bloomberg, Reuters or Dow Jones). If inside information is forwarded immediately to a service platform, which is used for the distribution of ad-hoc publications, the notifications to the Vienna Stock Exchange and the FMA may be omitted.

The Capital-Market Compliance Officer of Telekom Austria AG must be involved by Investor Relations from the beginning in the ad-hoc publication process.

Telekom Austria AG must display all the inside information that it has disclosed to the public for a period of at least 5 years on its website in a chronological order, stating the date and time of publication.

After publication of inside information, there are no restrictions on passing this information on with regard to capital-market regulations.

Within the A1 Telekom Austria Group, appropriate measures must be taken to ensure that persons only have access to inside information on a strict need-to-know basis, meaning such information is essential for performing their duties. Confidentiality is ensured as long as the issuer has, through employees involved in the process, reliable control, who will get to know the information. If confidentiality can no longer be guaranteed, the inside information must be published immediately.

The inside information to be published must be clearly referred to as "inside information". The text of the message must include, but is not limited to, the issuer’s name, the issuer's address; the international securities identification numbers and the stock exchange and trading segments for which an admission exists or has been applied for; the inside information to be published (which must be concisely formulated) and the release date of the inside information.

If inside information is published accidentally (other than described above), the Capital-Market Compliance Officer and the Management Board of Telekom Austria AG must be informed immediately by the person who caused the accidental disclosure.

The accidentally informed person must be made aware of the insider nature of the information. Until publication, a blocking period for the disclosure of this information and for the execution of relevant securities transactions must be imposed upon this person and the person must be made aware of the importance of the insider penalisation standard. If there would be a period of several days between the accidental disclosure of inside information and the date of publication, the Management Board of Telekom Austria AG, in agreement with the Capital-Market Compliance Officer, will decide whether the suspension of the trading of securities issued by Telekom Austria AG on the Vienna Stock Exchange is to be applied for.

7 Insider-Lists

The Capital-Market Compliance Officer must compile a list of all persons who have access to inside information if such persons perform their duties for A1 Telekom Austria Group based on an employment contract or otherwise and thus have access to inside information, e.g. consultants, auditors, lawyers or rating agencies ("insider-list"). The insider-list needs to be updated immediately if the reason for recording persons already recorded on the insider-list changes, a new person has access to inside information and must therefore be included on the insider-list, or a person no longer has access to insider information.

The insider-list shall contain in particular the following information:

- the date of initial creation and any updates of the insider-list,
- all natural persons (including persons outside the company) having knowledge about inside information stating their first and last name, date of birth, business telephone numbers (extension and mobile), functions and the reason for classification as an insider, as well as the date and time when the insider gains access to specific inside information and when that access ceases,
- legal persons maintaining their separate insider-list stating the company or business name, the commercial register number, the address of the company headquarters, the precise time and reason for inclusion on the insider-list, as well as an authorized representative with all business telephone numbers (extension and mobile),
- other information concerning the disclosure of inside information and requests concerning an exemption from the trading ban.

The insider-list must be updated regularly, indicating the date and time of the change, and must be communicated to the FMA immediately upon request. The insider-list must be kept for at least 5 years after it has been created or last updated.

For every new item of insider information, new sections must be added to the insider-list. Each section of the insider-list contains only information on individuals who have access to the insider information relevant to this section.

The insider-list may include a supplementary section with the details of individuals who have access to all inside information (permanent insiders) at any time.

The insider-list must be prepared and updated in electronic form. When creating the insider-list, the confidentiality of the information contained therein, the restriction of access to the insider-list to clearly defined persons, the accuracy of the information contained on the insider-list and the access to previous insider-list versions and their retrieval must be taken into account.

All persons with access to insider information must acknowledge in writing the obligations arising from the legal and administrative capital-market provisions and take note of the sanctions applicable to insider trading or the improper disclosure of inside information. For this purpose, the statement of undertaking must be signed.

Legal persons outside the A1 Telekom Austria Group (banks, lawyers, auditors, consultants, etc.) acting on behalf or at the expense of A1 Telekom Austria Group must maintain their own insider-lists according

to the same standards and keep a record of persons who work for them based on an employment contract or in some other capacity, and – regularly or for a special purpose – have access to inside information of Telekom Austria AG. On request, Telekom Austria AG shall be granted access to these insider-lists at any time. The legal person, as well as at least one authorised representative, must be added to the insider-list of Telekom Austria AG.

If the creation of an insider-list by a legal person acting on behalf of or at the expense of A1 Telekom Austria Group is not appropriate for organizational reasons, all natural persons acting for the legal person and having access to inside information of Telekom Austria AG regularly or for a special purpose can be included directly in the insider-list of Telekom Austria AG. In this case, a representative of the legal person has to provide all necessary information to the Capital-Market Compliance Officer of Telekom Austria AG immediately.

8 Classified Units of Confidentiality

8.1 Implementation of Classified Units of Confidentiality

Classified units of confidentiality are both permanent and temporary (project-related) units within groups of people have access to inside information on a regular or occasion-related basis.

Permanent classified units of confidentiality are thus to be formed where inside information typically occurs in the relevant unit or in groups of people concerned. This is to ensure that confidential and stock price sensitive information - regardless of whether (already) inside information is available - is treated with the necessary confidentiality at an early stage.

Classified units of confidentiality must be separated from other units by organizational measures with regard to information exchange.

People with access to inside information must acknowledge in writing the obligations arising from the legal and administrative provisions and declare in writing that they are aware of the sanctions that will be imposed in the event of misuse or improper dissemination of such inside information.

8.2 Permanent Classified Units of Confidentiality

Permanent classified units of confidentiality, in terms of this policy, are corporate units or groups of persons concerned in which, based on general experience, inside information typically appears. Their size is determined by the Capital-Market Compliance Officer together with the first management level responsible, irrespective of company borders (i.e. also including persons who are not employees of Telekom Austria AG but who work in subsidiaries in the respective classified units of confidentiality; allocation by function).

The following permanent classified units of confidentiality are defined:

- Supervisory Board of Telekom Austria AG (+ ÖBAG)
- Management Board of Telekom Austria AG (+ assistants)
- Other Leadership Team members of A1 Telekom Austria Group (+ assistants)
- A1 Telekom Austria AG Leadership Team (+ assistants)
- Capital-Market Compliance
- General Secretariat
- Investor Relations
- A1 Telekom Austria Group Corporate Communications & CSR
- A1 Telekom Austria Group Legal / General Counsel
- Mergers & Acquisitions
- A1 Telekom Austria Group Accounting & Taxes

- A1 Telekom Austria Group Controlling
- A1 Telekom Austria Group Treasury
- Persons with access to the A1 Group Controlling Dashboard (Group Monthly Performance Report - MPR, Group Cash Flow & Working Capital - CFWC).

8.3 Temporary Classified Units of Confidentiality

The establishment of temporary classified units of confidentiality is project related (e.g. for M&A projects). Persons who manage such a project must specify in writing the beginning, end, code name, activities, and members of the temporary classified unit of confidentiality and inform the Capital-Market Compliance Officer accordingly. The Management Board of Telekom Austria AG has to approve the establishment of a temporary classified unit of confidentiality.

Examples of temporary project-related units of confidentiality are:

- purchase/sale of or participation in companies,
- development of new markets,
- significant corporate restructuring.

For members of a temporary classified unit of confidentiality a continuous trading ban up to the end of the project can be enacted, irrespective of whether a periodic trading window for classified units of confidentiality is open or not.

The Capital-Market Compliance Officer has to maintain a list of members of temporary units of confidentiality.

8.4 Trading Ban and Trading Windows for Members of Classified Units of Confidentiality

For security reasons, members of permanent classified units of confidentiality are only permitted to trade in Telekom Austria AG shares and debt securities, in derivative financial instruments relating thereto and in other financial instruments of the A1 Telekom Austria Group within the trading windows 20 working days[1] after publication of the annual, half-yearly and quarterly results. During the rest of the time, trading, issuing a recommendation and cancelling or amending a trading order with these financial instruments is prohibited.

These trading windows are introduced in order to make it easier for the members of permanent classified units of confidentiality of A1 Telekom Austria Group to determine when they may trade in sensitive securities, and when not.

For temporary classified units of confidentiality, blocking periods are set by the Capital-Market Compliance Officer after consultation with the Management Board of Telekom Austria AG, irrespective of the existence of a trading window.

However, as soon as an employee has inside information, no trading is permitted – irrespective of whether it is a member within or outside of a classified unit of confidentiality and no matter whether a trading window is open or not.

The regulations with regard to prohibiting trading outside of trading windows apply to all stock exchanges on which shares or other securities or uncertified book-entry securities (e.g. derivatives) of A1 Telekom Austria Group are traded but also apply to over-the-counter (OTC) transactions. Breach of this undertaking may lead to proceedings under civil law and criminal law, as well as labor law.

In special cases, when it is very likely that inside information will occur, the Management Board of Telekom Austria AG is empowered, after consultation with the Capital-Market Compliance Officer, to shorten or cancel trading windows for the members of classified units of confidentiality. The date of the commencement, as well as - if one is already established - the concrete duration of the blocking period,

[1] For the purposes of this policy, 'working days' means all trading days on the Vienna Stock Exchange

must be communicated in an appropriate manner to the respective members of classified units of confidentiality.

The provisions on trading bans and trading windows also apply to orders issued by members of classified units of confidentiality in the name and/or on behalf of a third party, orders issued by a third party in the name and/or on behalf of members of classified units of confidentiality, as well as legal entities, fiduciary institutions or partnerships, that are directly or indirectly controlled by a member of a classified unit of confidentiality, that was established for the benefit of such a person or whose economic interests largely correspond to such a person.

In justified, personal circumstances of an individual member of a classified unit of confidentiality, the Capital-Market Compliance Officer may grant to the member of the classified unit of confidentiality an exception to the trading ban outside of the respective trading window if it is ensured that the securities transaction is not contrary to the legal regulations.

Applications for such an exception must be addressed to the Capital-Market Compliance Officer, stating the nature and reason for the intended transaction. The Capital-Market Compliance Officer shall document all applications relating to intended securities transactions of persons from classified units of confidentiality outside of a trading window, in particular by stating the name of the person concerned, the name of the security as well as nature and scope of and reason for the intended transaction. In addition, he must record his decision as well as the relevant reasons for his decision.

When acquiring own equity for share-based compensation (Long Term Incentive Program of A1 Telekom Austria Group) the provisions of the Capital-Market Compliance Policy and especially the trading ban outside of trading windows must be observed. In case of doubt the Capital-Market Compliance Officer must be consulted.

Trading in options or short selling in connection with Telekom Austria AG shares, Telekom Austria AG book-entry securities or bonds of the A1 Telekom Austria Group by members of the Management Board and the Supervisory Board of Telekom Austria AG, as well as by employees of the Telekom Austria AG is strictly prohibited.

9 Managers´ Transactions by Members of the Management Board, Supervisory Board and their Close Relatives

Members of the Management Board and the Supervisory Board of Telekom Austria AG, members of the Management and Supervisory Board of Telekom Finanzmanagement GmbH as well as persons who are closely related to these persons must report all transactions made by them on their own account in shares or bonds of Telekom Austria AG or related derivatives to the web platform of the Financial Market Authority (FMA), and Telekom Austria AG (managers.transactions@a1.com) immediately, at the latest within a maximum of 3 working days after the transaction for all transactions in excess of the threshold of € 20,000 per calendar year.

The reportable transactions include, in addition to purchase/sales transactions, the lending and pledging of financial instruments, provided that a pledge or other collateral is not used to secure a specific credit facility. In addition the reportable transactions include transactions executed by persons on behalf of a person with a reporting obligation, even if they exercise discretion and transactions that are carried out under a life insurance policy if the policyholder is a person with a reporting obligation who bears the investment risk and the policyholder has the power or discretion to make investment decisions regarding specific instruments under this life insurance policy or to execute transactions with respect to specific instruments of this life insurance policy.

According to Article 10 of Regulation (EU) 2016/522, the following transactions must be reported as a proprietary transaction (not an exhaustive list):

- acquisition, sale, short sale, subscription or exchange,
- acceptance or exercise of a stock option, including stock options granted to managers or employees as part of their remuneration package, and the sale of shares resulting from the exercise of a stock option,

- entering or exercising equity swaps,
- transactions with or in connection with derivatives, including transactions with cash settlement,
- conclusion of derivative contracts through a financial instrument of the relevant issuer,
- purchase, sale or exercise of rights, including sale and purchase options, as well as warrants,
- subscription to a capital increase or bond issue,
- transactions with derivatives and financial instruments related to debt of the respective issuer, including loan default swaps,
- conditional transactions made upon the occurrence of certain conditions and the actual execution of the transactions,
- automatic and non-automatic conversion of a financial instrument into another financial instrument, including the conversion of convertible bonds into shares,
- grants and donations made or received and inheritances received,
- transactions executed with products linked to an index, substitute baskets and derivatives,
- transactions carried out with shares in investment funds, including alternative investment funds (AIF) as defined in Article 1 of Directive 2011/61/EU,
- transactions executed by the administrator of an AIF in which the person performing management duties or a person closely related to this person invested, provided that a report is required under Article 19 of Regulation (EU) No. 596/2014,
- transactions executed by a third party in the context of a single portfolio management or an asset management mandate in the name or for the benefit of a person performing management duties or a person closely related to this person,
- lending transactions with the issuer's shares or debt instruments or with derivatives or other related financial instruments.

Persons closely related to the Management Board and the Supervisory Board members of Telekom Austria AG, and members of the Management and Supervisory Board of Telekom Finanzmanagement GmbH are:

- spouses and legally equivalent cohabiting partners,
- dependent children,
- relatives, if they have lived with the Management Board or Supervisory Board member in a joint household for at least one year prior to the actual transaction, and
- legal entities, trust (e.g. foundations) and partnerships,
    - where a member of the Management Board or Supervisory Board of Telekom Austria AG, a member of the Management or Supervisory Board of Telekom Finanzmanagement GmbH or by another person closely related (see above) have a board function,
    - that are directly or indirectly controlled by a member of the Management Board or Supervisory Board member of Telekom Austria AG, a member of the Management or Supervisory Board of Telekom Finanzmanagement GmbH or a person closely related (see above),
    - that have been established for the benefit the Management Board or Supervisory Board member of Telekom Austria AG, or a member of the Management or Supervisory Board of Telekom Finanzmanagement GmbH or a person closely related, or whose economic interests largely correspond to those of a Management Board or Supervisory Board member or a person closely related (see above).

The reporting obligation applies only to those legal entities, fiduciary arrangements (e.g. foundations) and partnerships listed above in respect of which a member of the Management Board or Supervisory Board of Telekom Austria AG, a member of the Management or Supervisory Board of Telekom Finanzmanagement GmbH, or a closely associated person participates in, or is capable of influencing, the decision to carry out transactions in financial instruments of A1 Telekom Austria Group

Telekom Austria AG must publish the notification immediately, at the latest 2 working days after receipt of the notification of the transaction. The persons with a reporting obligation are therefore requested to submit their reports without delay, using the form available on the FMA's website to Telekom Austria AG, to the attention of the Capital-Market Compliance Officer (alexander.heppe@a1.com) and the postbox managers.transactions@a1.com so that Telekom Austria AG can make the publication in a timely manner.

Please note the possibility of postponing the managers´ transaction disclosure until the transaction's total closing amount (no offsetting of purchases and sales permitted) of one person with reporting duties reaches € 20,000 within one calendar year. If this amount is not reached at the end of a calendar year, the report may be omitted.

Members of the Management Board and the Supervisory Board of Telekom Austria AG and members of the Management or Supervisory Board of Telekom Finanzmanagement GmbH must inform their closely related persons about the managers´ transaction reporting obligation in written pursuant to this Article 9 and retain a copy of this document.

The Capital-Market Compliance Officer must compile a list of persons with reporting obligation and persons closely related to them.

10 Capital-Market Compliance Officer, Ad-hoc Committee

The Capital-Market Compliance Officer of Telekom Austria AG is

- Alexander Heppe
  (phone no. +43 664 6622251 e-mail: alexander.heppe@a1.com, his deputy is
- Doris Schönhart
  (phone no. +43 664 6627837 e-mail: doris.schoenhart@a1.com).

10.1 Rights of the Capital-Market Compliance Officer

The Capital-Market Compliance Officer must be informed immediately of the first occurrence of inside information in the company.

In this function the Capital-Market Compliance Officer has directly access to the Management Board and Supervisory Board of Telekom Austria AG in case of the decision-making process whether an inside information already exists or not.

The Capital-Market Compliance Officer must be informed immediately about all decisions made by the Management Board of Telekom Austria AG in connection with the examination of the existence of inside information, unless he was already involved in the decision-making process of the Management Board of Telekom Austria AG.

10.2 Duties of the Capital-Market Compliance Officer

- The Capital-Market Compliance Officer is responsible for the preparation, roll-out and adaption of the Capital-Market Compliance Policy.
- He advises and supports the Management Board of Telekom Austria AG in matters relating to this policy.
- He shall provide training for employees from classified units of confidentiality.
- He informs employees and Board members, as well as persons who otherwise work for A1 Telekom Austria Group, about the prohibition of the misuse of inside information.
- He informs members of the Management Board or Supervisory Board member of Telekom Austria AG, or the Management or Supervisory Board of Telekom Finanzmanagement GmbH about the reporting obligation regarding managers´ transactions and maintain a list of close relatives.

- He is responsible for setting up temporary classified unit of confidentiality, if necessary. In this respect, the Capital-Market Compliance Officer must be notified of any planned implementation of a project, in the course of which inside information could typically come up. The beginning, end, members, description of the classified unit of confidentiality and the activity performed must be recorded in writing.
- He informs the Management Board of Telekom Austria AG and then the affected persons concerned about the establishment of a temporary classified unit of confidentiality and ensures that all persons on the insider-list acknowledge in written form the obligations to adhere to the Capital-Markets Compliance Policy.
- He maintains the insider-list.
- He has to be informed of breaches of the Capital-Market Compliance Policy by an employee and informs Human Resources so that the necessary sanctions are taken.

In cases of doubt, the Capital-Market Compliance Officer must be consulted on the content and interpretation of this policy; the Capital-Market Compliance Officer decides on these doubts in consultation with the Management Board of Telekom Austria AG.

10.3 Ad-Hoc Committee

The Capital-Market Compliance Officer, the Head of Investor Relations and the General Counsel form the ad-hoc committee, which advises the Management Board of Telekom Austria AG on all questions relating to the ad-hoc releases of inside information. The members of the ad-hoc committee must be involved early in circumstances or projects that could lead to obligatory ad-hoc releases.

The Management Board of Telekom Austria AG decides on the publication of inside information (ad-hoc releases). The publication of ad-hoc releases and the notification of the FMA is carried out by Investor Relations.

11 Monitoring und Sanctions

11.1 Monitoring

Information provided by honest and upright employees is one of the most effective ways of exposing misconduct in the company and is therefore an appropriate measure to expose serious risks early on within A1 Telekom Austria Group. Any employee can report a violation or suspicion of a violation of the legal framework and internal policies. We value whistleblowers who have provided information to the best of their knowledge. These whistleblowers do not incur any disadvantages as a result. This also applies to reports to FMA.

Whistleblowers should first approach their direct manager for initial support. If this is not possible, information can be addressed to the Capital-Market Compliance Officer.

Information can also be provided –anonymously, if preferred - to the tell.me whistleblowing-portal of A1 Telekom Austria Group.

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

No employees or managers will suffer retaliation, discrimination or disciplinary action for reports made in good faith or based on a reasonable belief of violation or suspected violation.

Managers, especially those of the first management level and of classified units of confidentiality, monitor the adherence to this Capital-Market Compliance Policy in their own area and inform the Capital-Market Compliance Officers about the occurrence of misconduct.

The Capital-Market Compliance Officer and A1 Group Internal Audit are entitled, as a matter of routine and with random checks to control compliance with the Capital-Market Compliance Policy. If any violations are found, the Capital-Market Compliance Officer will identify the persons responsible and inform Human Resources department so that the steps necessary under labor law are taken. The Capital-Market Compliance Officer must keep written records of the adopted procedures and the outcome of the investigations.

11.2 Sanctions

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.

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

Violations of this Capital-Market Compliance Policy may lead to consequences under civil, criminal, administrative and/or labor law, which may even include dismissal.

Perpetrators will be sued for reimbursement of all damages suffered.

12 Questions and Notes on this Policy

Questions and comments on this policy can be addressed to the Capital-Market Compliance Officer.

Alexander Heppe, Capital-Market Compliance Officer, Mobile: +43 664 66 22251, e-mail: alexander.heppe@a1.com.

13 Trading in América Móvil Securities

All employees of A1 Telekom Austria Group, who intent to trade with securities of our main shareholder América Móvil shall carefully read and comply with the „ Guidelines for trading in AMX shares and other securities of América Móvil in advance.

Distribution

The Capital-Market Compliance Policy of Telekom Austria AG will be sent to the following:

- Management Board and Supervisory Board of Telekom Austria AG,
- first management level of Telekom Austria AG,
- all employees of Telekom Austria AG,
- all members of Management and Supervisory Board of Telekom Finanzmanagement GmbH,
- all members of all classified units of confidentiality,
- other persons working for classified units of A1 Telekom Austria Group,
- Capital-Market Compliance Officer and Group Compliance.

History

Date	**Measure**
6th Sept. 2012	Put into force by the Group Management Board of Telekom Austria AG
6th Sept. 2017	Ad Hoc trigger events
18th April 2018	Adaption according to MAR und BörseG 2018
8th March 2023	Adaption of ad hoc trigger event for dividend
23rd Dec. 2024	Doris Schönhart Deputy Capital Market Compliance Officer Reporting obligation for managers' transactions of € 20,000 or more
4th Feb. 2025	Adaption of ad hoc trigger events
11th Dec. 2025	Update of tell.me link to the new whistleblowing system
10th Sept. 2026	Update due to the EU Listing Act
16th Oct.2026	Alexander Heppe, Capital Market Compliance Officer and simplification of insider list

Annex 1: Capital-Market Compliance - Statement of Undertaking for Persons from Classified Units

Classified unit:	
Name:	
Date of birth:	
Address:	
Email address:	
In the classified unit since:	

Statement of Undertaking

I have received the A1 Telekom Austria Group Capital-Market Compliance Policy (as of October 2026), have read and understood them, and hereby undertake to comply with all of their stipulations.

As an employee of a classified unit of confidentiality, I undertake, above all, to strictly comply with the legal prohibition on the misuse of inside information, the organizational measures governing the handling of inside information and the trading restrictions outside trading windows. The trading windows will be open during the 20-working day period following the disclosure of the yearly, half-yearly or quarterly results respectively. Whilst in possession of an inside information, I must not buy or sell Telekom Austria shares, other Telekom Austria securities, derivatives or other financial instruments relating to the afore mentioned financial instruments; nor must I recommend their purchase or sale or cancel or amend existing orders.

I will immediately announce any changes concerning my affiliation with a classified unit of confidentiality.

I acknowledge any obligations arising from legal and administrative capital-market legal provisions and am aware of any sanctions that will be imposed in the event of misuse or improper dissemination of insider information.

I confirm the above undertaking by signing this statement.

.....

(Date; employee's signature)

This statement of undertaking is to be given to the Capital-Market Compliance Officer of Telekom Austria AG:

Alexander Heppe, Director Group Compliance
1020 Vienna, Lassallestraße 9, alexander.heppe@a1.com

Annex 2: Capital-Market Compliance - Statement of Completion and Undertaking - 1st management level

Classified unit:	
Name:	
Date of birth:	
Address:	
Email address:	
In the classified unit since:	

Statement of Completion and Undertaking

I have received the A1 Telekom Austria Group Capital-Market Compliance Policy (as of October 2026), have read and understood them, and hereby undertake to comply with all of their stipulations.

As a member of a classified unit of confidentiality, I undertake, above all, to strictly comply with the legal prohibition on the misuse of inside information, the organizational measures governing the handling of inside information and the trading restrictions outside trading windows. The trading windows will be open during the 20-working day period following the disclosure of the yearly, half-yearly or quarterly results respectively. Whilst in possession of an inside information, I must not buy or sell Telekom Austria shares, other Telekom Austria securities, derivatives or other financial instruments relating to the afore mentioned financial instruments; nor must I recommend their purchase or sale or cancel or amend existing orders.

I have made the Capital-Market Compliance Policy of A1 Telekom Austria Group (as of October 2026) known to all employees of my unit and to those individuals who otherwise work in areas sensitive to capital markets compliance within my unit. I take care, that all Statements of Undertaking of the employees of my unit and the information required for the "insider-list" are given to the Capital-Market Compliance Officer.

All persons, who join my classified unit of confidentiality are to be reported immediately to the Capital-Market Compliance Officer, who will carry out initial capital-market compliance training in the first 14 days after joining the classified unit of confidentiality.

I acknowledge any obligations arising from legal and administrative capital-market provisions and am aware of any sanctions that will be imposed in the event of misuse or improper dissemination of inside information.

I confirm this by signing this statement of completion and undertaking.

.....

(Date; signature of the director of the first management level)

This statement of completion and undertaking is to be given to the Capital-Market Compliance Officer of Telekom Austria AG:

Alexander Heppe, Director Group Compliance
1020 Vienna, Lassallestraße 9, alexander.heppe@a1.com

Annex 3: Capital-Market Compliance - External Statement of Undertaking

Name:	
Date of birth:	
Address:	
Email address:	
Company, address	
Company register number:	

Statement of Undertaking

I hereby undertake to comply with all with all applicable capital-market regulations as summarized in the Capital-Market Compliance Policy of Telekom Austria AG (as of October 2026) and to inform my current and future employees as well as all third parties working for me and which are involved in a capital-market-sensitive project of the A1 Telekom Austria Group, of the prohibition of misuse of insider information and the sanctions for the misuse or improper dissemination of insider information

If our company maintains its own insider-list of persons with insider information from Telekom Austria AG, the Capital-Market Compliance Officer must be informed immediately of the company data required for his insider-list and a natural person authorized to represent our company.

If the creation of an insider-list by a legal person acting on behalf of Telekom Austria is not appropriate for organizational reasons, all natural persons acting for the legal person and having access to insider information of Telekom Austria regularly or for a special purpose can be included directly in the insider-list of Telekom Austria. In this case, I will immediately provide all necessary information to the Capital-Market Compliance Officer of Telekom Austria AG.

I acknowledge any obligations arising from legal and administrative provisions and am aware of any sanctions that will be imposed in the event of misuse or improper dissemination of inside information. I hereby extend this acknowledgement to all my staff and third parties working on my behalf who are involved in a capital market-sensitive project of the A1 Telekom Austria Group.

.....

(Date, signature)

This statement of undertaking is to be given to the Capital-Market Compliance Officer of Telekom Austria AG:

Alexander Heppe, Director Group Compliance
1020 Vienna, Lassallestraße 9, alexander.heppe@a1.com

Annex 4: Capital-Market Compliance - Statement of Undertaking for Management and Supervisory Board Members, their Close Relatives and Persons supporting Members of the Supervisory Board in their function

Name:	
Date of birth:	
Company address:	
Residential address:	
Email address:	
In the classified unit since:	

Statement of Undertaking

I have read and understood the A1 Telekom Austria Group Capital-Market Compliance Policy (as of October 2026) and hereby undertake to comply with all their stipulations.

I herewith confirm that I have been informed about the stipulations concerning confidentiality of insider information and acknowledge explicitly that misuse of insider information, especially trading in shares and derivatives or other financial instruments of Telekom Austria being aware of insider information is punishable with imprisonment.

Furthermore, outside of the trading windows, I undertake not to buy or sell either Telekom Austria shares or derivatives or other securities in the afore mentioned financial instruments, not to give any recommendations concerning their purchase or sale, not to cancel or change existing orders and not to disseminate any other insider information. The trading window will be open during the 20 working day period following the disclosure of the yearly, half-yearly or quarterly results.

I will inform persons who are closely related to me as a member of the Supervisory Board (see chapter 9 of the Capital-Markets Compliance Policy) in writing about their obligations concerning directors' dealings and will keep a copy of this information.

I will report immediately all transactions made on my own account in shares or other equities of Telekom Austria or related derivatives to Telekom Austria (managers.transactions@a1.com) and the web platform of the Financial Market Authority (FMA) https://webhost.fma.gv.at/DirectorsDealings/ in excess of the threshold of € 20,000 per calendar year.

I will inform the Capital-Market Compliance Officer about all my close relatives stated in chapter 9 of these Policy and about all personal data and changes thereof required for the insider-list (see chapter 6 of these Policy).

I acknowledge any obligations arising from legal and administrative provisions and am aware of any sanctions that will be imposed in the event of misuse or improper dissemination of inside information.

I confirm this by signing this statement of undertaking.

.....

(Date, signature)

This statement of undertaking is to be given to the Capital-Market Compliance Officer of Telekom Austria AG:

Alexander Heppe, Director Group Compliance
1020 Vienna, Lassallestraße 9, alexander.heppe@a1.com