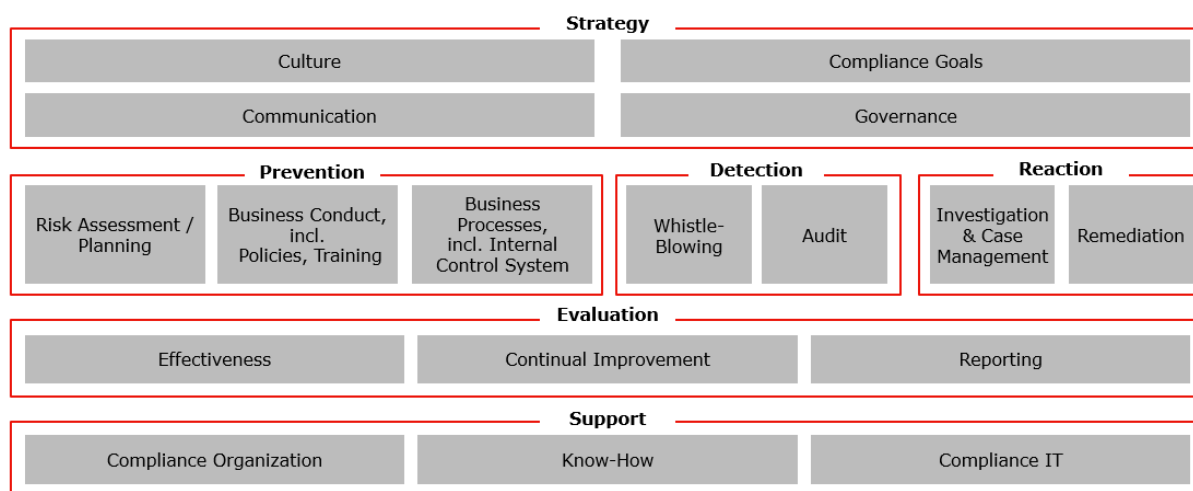




Compliance Management System of A1 Telekom Austria Group

Compliance Policy

Compliance is firmly anchored in corporate governance as well as in the corporate culture and strategy of A1 Telekom Austria Group. Compliance defines the attitude and conduct of all managers and employees through a set of clear measures to promote good conduct. Maintaining and improving an externally certified compliance management system (CMS) in line with best practice is an essential element of our corporate governance and ESG strategy, because impeccable conduct from an ethical and legal perspective is crucial for trustworthiness in the eyes of customers and other stakeholders. Regular reviews of the compliance management system's appropriateness and effectiveness aim to ascertain whether current compliance requirements are being met and where there still may be potential for improvement. The A1 Telekom Austria Group CMS follows a certain defined structure characterizing an integrated management system. This approach enables A1 Telekom Austria Group to reach the goals of compliance in an efficient, intelligent and resource effective way.



Compliance at A1 Telekom Austria Group is an ongoing process and the outcome of meeting its obligations such as relevant laws, industry standards, as well as standards of good corporate governance, best practices, ethical standards and community expectations. The A1 Telekom Austria Group CMS takes into account the size and complexity of our organization and basic principles, which form the basis of our relationship with internal and external stakeholders. Compliance at A1 Telekom Austria Group is made sustainable by embedding it in the culture and in the behavior and attitude of our managers and employees. While maintaining its independence, the compliance management of A1 Telekom Austria Group is integrated with other management processes and its operational requirements and procedures.

As part of the A1 Telekom Austria Group CMS the compliance policy and the compliance strategy forms the governance and basis for the operative management of compliance fostering integrity and a positive compliance culture. Together with our human rights engagement, our supplier engagement and the data privacy management system, the A1 Group Telekom Austria CMS is an essential part of the governance pillar of our ESG strategy "Empowering a fair Digital Life".

A1 Telekom Austria Group, listed on the Vienna Stock Exchange, is a leading provider of digital services and communication solutions in Central and Eastern Europe offering communication, payment and entertainment services as well as integrated business solutions to around 30 million customers. A1 Telekom Austria Group is currently operating in seven countries under the brand A1: Austria, Bulgaria, Croatia, Belarus, Slovenia, the Republic of North Macedonia and the Republic of Serbia. Through A1 Digital, A1 Telekom Austria Group offers industry-specific solutions for business customers in its core markets as well as in Germany, Switzerland and Spain. As European unit of América Móvil, one of the largest telecommunication companies in the world, A1 Telekom Austria Group is headquartered in Vienna and gives access to global solutions.

A1 Telekom Austria Group is operating in a dynamic environment and is constantly facing challenges, in particular more demanding markets, rising customer needs and expectations, the need to defend and expand our core business and to discover new growth opportunities. To keep pace with these dynamics we need to be adaptive and put humans in the center.

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 group's economic success and reputation in the long-term. In addition, respectful and appreciative interaction with one another is also an important component of our corporate culture. We realize our vision of "Empowering Digital Life" for our customers and the society. A1 Telekom Austria Group actively

assumes its ecological and social responsibility by promoting more efficient, resource-conserving, and thus more sustainable ways of working and living.

Integrity is the basis of A1 Telekom Austria Group's business. For A1 Telekom Austria Group, it is not only important to achieve its goals; it is also important HOW the goals are achieved. Ethically and legally impeccable behavior is everybody's personal responsibility in A1 Telekom Austria Group.

To ensure the effectiveness and transparency of the A1 Telekom Austria Group CMS this compliance policy¹ is formulated and communicated to our stakeholders via internet. The compliance policy contains overarching principles and the organization's commitment to reach compliance.

A1 Telekom Austria Group has joined the UN Global Compact. The Group has thus committed itself to implement fundamental requirements in the areas of human rights, labor, environment and the fight against corruption. A1 Telekom Austria Group aligns its activities in order to support the United Nations Sustainable Development Goals.

A1 Telekom Austria Group maintains and constantly improves an externally audited best practice compliance management system (CMS) to ensure integrity and trustworthiness within the group. The A1 Telekom Austria Group CMS is suitable to conform to international legal requirements (including US Foreign Corrupt Practices Act (FCPA), EU Anti-Corruption Directive and the UK Bribery Act), and international standards (ISO 37301 Compliance Management System, ISO 37001 Anti-Bribery Management System, ISO 37002 Whistleblowing Management System, UN Global Compact, OECD guidelines for multinational enterprises) and is regularly externally audited.

Acting with integrity in our daily business life is essential for the sustainable business success and the reputation of A1 Telekom Austria Group. Managers are primarily responsible for acting with integrity by setting the appropriate tone-from-the-top/middle. It is their responsibility to regularly address the importance of this conduct and to set an example through their own conduct. All A1 Leadership Team members annually sign a Compliance Commitment, which comprehensively describes their role and responsibilities within the CMS. However, this does not relieve employees of their own responsibility to act ethically and with integrity.

A materiality analysis of sustainability topics conducted regularly with internal and external stakeholders also covers important compliance aspects. The Sustainability Statement of A1 Telekom Austria Group shows the results of the materiality analysis and the measures taken in the areas covered, including compliance.

To avoid potential misconduct, A1 Telekom Austria Group has defined clear rules for ethical behavior and integrity in all its business relationships and has therefore implemented the A1 Group Code of Conduct and the A1 Group Compliance Guidelines and integrated appropriate controls into business processes. In order to sustainably embed the principle of integrity in A1 Telekom Austria Group, training courses optimized for the respective target groups are held regularly. In the consistent implementation of the relevant measures and tools within all business units, Group Compliance is supported by local compliance officers in the subsidiaries.

Misconduct and violations of standards of conduct have serious consequences, not only for the individual, but also for the entire company. A1 Telekom Austria Group punishes conscious, unlawful misconduct and violations of internal guidelines consistently, regardless of the rank or position of the person concerned.

To ensure sustained prevention and cover potential risks within A1 Telekom Austria Group, employees – but also external parties – have the opportunity to report information of possible misconduct via the A1 [tell.me](#) whistleblowing platform – whereby they can remain fully anonymous, if they wish. Hints of employees can also be given to the direct superior or the responsible compliance manager. If a manager receives a whistleblower report, the compliance team must be notified of this report.

Signals from honest and trustworthy employees are one of the most effective ways of uncovering misconduct in the company and thus protect A1 Telekom Austria Group from serious danger. Any employee, as well as any other person concerned, can report a violation or suspected violation of legal requirements, the Code of Conduct and internal guidelines. Nothing negative will happen to honest whistleblowers who have provided information to the best of their knowledge. Whistleblowers' reports will be investigated and verified confidentially and by persons committed to confidentiality.

¹ A1 Telekom Austria Group pursues an integrated compliance management approach. Therefore, this compliance policy is also our anti-corruption policy and whistleblowing policy

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