



CETIN Bulgaria Code of Conduct

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A Message from the CEO

Dear colleagues,

Achieving great success is a complex formula – one that we at CETIN continuously strive to master. Over the years, we have consistently met our targets, keeping the promises to our stakeholders.

In today's fast-paced world, shaped by constant innovation and disruptive change, striving for excellence is not defined solely by exceeding goals and targets. High performance at CETIN means conducting business in a sustainable way, in full compliance with the law, and in line with the highest ethical standards. Being a trusted partner to our customers, shareholders, colleagues, business partners, and the communities in which we operate is central to fulfilling our purpose as a company — enabling progress and creating shared value that strengthens both society and our group.



Our Code of Conduct is the foundation upon which this success is built. It supports a corporate culture of accountability, integrity, and sound judgment, ensuring that ethical standards guide every decision we make.

Simply put, the Code of Conduct helps us make the right choices at work — to speak up when needed, to act responsibly, and to treat our colleagues and stakeholders with respect, in line with CETIN's principles. It is the responsibility of each of us — every employee, leaders, and executive, as well as everyone who does business with

CETIN — to live our values through our actions.

The Code of Conduct reflects our strong belief that **doing good is good business**.

Thank you for your continued commitment to helping CETIN achieve its goals while upholding the highest ethical standards – together, as one team.

Petar Mudrinić

Chief Executive Officer of
CETIN Bulgaria

Introduction

CETIN Bulgaria ("**CETIN**") is wholly owned by CETIN International N.V., 70% of which is owned by e& PPF Group B.V., with Roanoke Investment Pte Ltd holding the remaining 30% stake as a nominated investment vehicle of GIC Infra Holdings Pte Ltd in Singapore. CETIN and its affiliates, which are controlled by e& PPF Group B.V., operate in four markets in the CEE region: Bulgaria, Hungary, Serbia and Slovakia (the "**Group**"). For more detailed information, please visit the following website: e& PPF Telecom Group – [About Us](#).

Why We Have a Code of Conduct

This is our Code - it guides the choices we all make, so that our success is built on doing good.

At CETIN, we are fully committed to doing business in accordance with the highest standards of ethics and integrity, with professional business principles, and in compliance with legal and regulatory rules and standards.

This Code of Conduct (this "**Code**") is our central policy document, which outlines how all employees, executives, and board members (which are generally referred to as "**employees**" or "**you**" for purposes of this Code) engaged by CETIN should apply our values and behaviours. It provides an overview of the legal, regulatory and ethical rules and standards essential to achieve the Group's objectives and uphold its values for its operations globally. It also reflects the ethical rules and standards of our direct and indirect shareholders. Our Code sets out what we expect from every single person working for and with the Group and underlines our responsibilities to our employees, executives, and board members, as well as our business partners, shareholders, and the communities where we operate. Our Code helps us make the right decisions and tells us where to go for more information.

You may have additional policies that you need to adhere to, specific to your role in CETIN. If you believe that any internal policies and guidelines of CETIN conflict with this Code, please notify the Ethics & Compliance Officer so that any such conflict is disclosed and may be resolved by CETIN.

To ensure that CETIN complies with the highest legal, regulatory, and ethical rules and standards on an ongoing basis, our Code will be updated regularly. Please make sure that you comply with the latest version, which is available online at the [Code of Conduct](#) page.

Our Values

Customers

We anticipate and deliver

We strive to understand, anticipate, and serve the needs of our customers and their end-users. We are here to help them perform better and faster. By keeping our promises, we provide an excellent user experience.

People

Respect and teamwork

We are proud of our talented, skilled, and motivated colleagues. Ensuring professional growth and well-being is our priority. We believe that respect, open communication, and teamwork create the best foundation for success and a friendly workplace.

Technology

The backbone of our existence

We are passionate about the technology that is the backbone of our existence. We design, build, and operate high-quality networks and provide innovative solutions without any compromise on security.

Partnership

Communities and innovators

We are proud members of the diverse communities that we live in, and help them thrive. We also choose to partner with innovators who, like ourselves, believe that communications technology and services are here to improve the quality of life.

Our Responsibility

We want everyone working for and with CETIN, independent of role, rank, and responsibility, to comply with our Code in their day-to-day work and take actions that will preserve the trust that our customers and society place with us.

What our Code means for

- **Our employees** - As a CETIN employee, you must make time to read our Code and understand what is expected from you. This includes behaving in an ethical manner, taking pride in your actions and decisions. We expect you to apply our values in your day-to-day work and to comply with the principles and rules set out in our Code.
- **Our Customers** – Customer centricity is at the heart of our values. Our promise to our customers is that we will provide the highest quality of service and focus on consistently exceeding expectations.
- **Our Partners and Suppliers** – The Group is committed to doing business transparently and to respect the human rights of all stakeholders, including our partners, suppliers, and the broader community where we operate.
- **Our Commitment to the Environment** – We have a responsibility as a group to take care of the environment and to manage and minimise our impact on the environment. As part of this, we will take into account environmental responsibility as a factor in business decision-making and will strive to work with our business suppliers and partners to ensure that they support our environmental objectives and work to reduce their impact on the environment.

We undertake for CETIN employees to review and acknowledge this Code annually and aim to perform periodic training on this Code for all CETIN employees in order to reinforce the values that we set out in this Code.

Our leadership

At CETIN, our leadership is values-based, and this is crucial to ensuring an organisational culture which meets the highest standards of honesty, integrity and ethical conduct. Our senior leaders will strive to champion the culture that the Group aims for and will demonstrate the organisation's values on a day-to-day basis and treat employees at all levels in a respectful and positive way.

Our managers and senior leaders are expected to act as role models by:

- Upholding a safe, positive, and ethical work environment.
- Behaving and managing others in a way that honours Group's core values.
- Hiring, promoting, and delegating in a manner that is legal and ethical.
- Displaying integrity and transparency when handling challenging situations.
- Providing an environment for everyone to grow through continued learning opportunities.
- Being alert to possible misconduct in the workplace.
- Responding appropriately and in a timely manner to colleagues seeking help.

- Maintaining accountability among all employees.
- Fostering an open-door culture where employees feel comfortable asking questions and raising concerns.
- Preventing retaliation against employees who raise concerns in good faith or who participate in investigations.
- Managing situations that may involve a conflict of interest by ensuring reasonable and appropriate resolution.

You can find [more information and guidance](#) to help you fulfil your responsibilities as a manager and role model for your team and colleagues on the internal network of CETIN, in addition to the relevant policies and procedures of CETIN. If you have a particular concern or query on the application of any topics within our Code, please contact the Ethics & Compliance Officer at compliance@cetinbg.bg.

Working Together

How we treat each other

The Group strives to create a working environment that respects diversity and gives employees the opportunity to learn, grow, and develop their talents. Employees, in turn, must treat each other and third parties respectfully and fairly.

The Group believes that everyone should be treated with dignity and respect, therefore, the Group prohibits all forms of discrimination, harassment (including any forms of sexual harassment), bullying, humiliation, threats of violence and abusive or offensive behaviour.

These behaviours are considered a serious act of misconduct and may subject you to disciplinary or legal action.

Everyone working for and with CETIN is empowered to take immediate action, in due process, regardless of role, rank or responsibility, when they see a situation that interferes with our Code and the Group's standards of ethics and integrity.

Fostering a culture of Inclusion

At CETIN, we believe in creating an environment where everyone feels valued and empowered. We are committed to creating a more inclusive workplace where people, regardless of their different abilities, will have a chance to thrive, which is why we have adopted the Diversity, Equity and Inclusion Policy (DEI Policy) that is available on our [website](#). Together, we unite to foster an inclusive, equitable environment for all. All employees are expected to treat everyone they interact with, whether it be colleagues, clients, or partners, with dignity, respect, and courtesy. Our employees have the right to work in a safe environment free from discrimination. By complying with our Code, you ensure that we create a workplace free from discrimination, bullying and harassment, where everyone can achieve their full potential. Inclusion is not just a value; it is an expectation of behaviour. All employees, contractors, and representatives are required to uphold the following principles in their daily conduct:

1. Embracing diversity as a strength

We believe diversity is our strength. Our goal is to impact lasting change through our actions and build a company that represents a variety of backgrounds, perspectives and abilities at all levels.

2. Fostering belonging through collaboration

Creating spaces where all voices are valued and welcomed, contributions are acknowledged, and ideas are evaluated equitably, and all feel empowered and connected. No one should feel excluded based on who they are or how they work.

3. Inclusive communication

We are committed to fostering inclusive communication practices that ensure all employees, customers, and stakeholders can engage effectively and feel valued. Inclusive communication is integral to CETIN's organisational culture, promoting collaboration, understanding, and respect across diverse groups.

4. Equity in access, opportunity, and advancement

We are committed to identifying and removing barriers that prevent full and fair participation. This includes designing products and processes that are accessible to all and promoting equitable pathways for development, contribution, and leadership within CETIN.

Equal opportunities in employment

At CETIN, we treat our colleagues, candidates, clients, and business partners fairly and on merit. The Group prohibits any form of discrimination, directly or indirectly, on the basis of age, race, colour, sex, religion, national or social origin, disability, or any other characteristic protected by law.

We work together to make sure:

- there are no forms of unlawful discrimination in all aspects of employment, including in recruitment, promotion, opportunities for training, pay and benefits.
- candidates for employment or promotion are assessed objectively against the requirements for the job.
- all employees are fairly compensated based on minimum wages allowed by laws and regulations.
- disability and personal or home commitments do not form the basis of employment decisions except where necessary.
- We support reasonable accommodations and flexible arrangements to ensure all employees, including colleagues of determination, can contribute fully and equitably.

We understand discrimination is not limited to in-person interactions, it can also be online via email, instant messaging, text, video calls, and posting comments on social media (including personal social media accounts).

CETIN recognises that training is an important factor in promoting diversity and inclusion at work and takes steps to increase employees' awareness of the values and principles required to apply our Code in practice.

Bullying and harassment

You have the right to feel safe, welcome, and comfortable as you conduct your day-to-day work. In line with our values, you should feel empowered to raise challenges and make complaints if you experience any behaviour that falls below this standard.

Bullying can take many forms, however, it is usually described as unwanted behaviour that is offensive, intimidating, malicious or insulting or an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone. Power does not always mean being in a position of authority and can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal, and non-verbal conduct. Harassment can also take many forms, but is often characterised by unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating and/or offensive environment for that person. It may be a pattern of behaviour or a one-off incident. It can happen anywhere, including

face-to-face, on social media, in emails or in calls. Conduct may constitute harassment whether or not the person engaging in it intends to cause offence.

We should remember that something, although intended as a "joke", may offend another person.

Different people find different words, actions or conduct acceptable and unacceptable. We each have the right to decide what behaviour is acceptable to us and to have our feelings respected by others. As a diverse organisation, it is important that we should all be respectful and mindful of each other's cultural considerations.

We understand that any form of bullying and harassment can have very serious consequences for individuals and the organisation. Bullying and harassment may cause stress, unhappiness and/or affect health and family and social relationships, and may affect an employee's work performance and could cause them to leave their job.

CETIN will not tolerate conduct by any individual that amounts to bullying, harassment, physical punishment, or victimisation of another member of staff or third party; disrupts or interferes with another individual's work performance; or creates an intimidating, offensive or hostile environment.

We will treat any bullying, harassment, or victimisation as a disciplinary matter that may lead to dismissal. Aggravating factors, such as abuse of power over a more junior colleague, will be taken into account in deciding what disciplinary action to take. If the harasser or bully is a third party, such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Serious harassment may be a criminal offence.

Sexual harassment

Sexual harassment is any unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, even if this was not the intent of the person carrying out the conduct. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, or where a person is treated less favourably for either rejecting or submitting to sexual advances.

It includes situations which create an environment which is hostile, intimidating, offensive, degrading, or humiliating for the recipient. All sexual harassment is prohibited, whether it takes place within our premises or outside, including at social events, business trips, training sessions, or conferences sponsored by the Group.

Anyone who is subject to sexual harassment should, in the first instance, if possible and appropriate, inform the alleged harasser that the conduct is unwanted and unwelcome. CETIN recognises that sexual harassment may occur in unequal relationships (i.e., between a supervisor and their employee) and that there may be situations in which you may not feel able to inform the alleged harasser directly.

If you do not feel able to approach an alleged harasser directly, you should approach a member of the Human Resources department, the Ethics & Compliance Officer, or report the issue in confidence or anonymously to whistleblower reporting services, as described in detail below.

What you can do to help

We aim to create an inclusive environment at CETIN where everyone feels respected, valued, and confident that they belong. We can all play our part by:

- being aware of how your own behaviour may affect others and changing it, if necessary, you can still cause offence even if you did not intend to do so;
- ensuring that you pronounce and spell your colleagues' names correctly;
- treating your colleagues with dignity and respect;
- taking a stand if you think inappropriate jokes or comments are being made;
- making it clear to others when you find their behaviour unacceptable;
- intervening, when and if possible, to stop bullying, harassment and discrimination you witness;
- reporting harassment or bullying to your manager, the Human Resources department or the various whistleblowing channels described in this Code, and reasonably co-operating in investigations; and
- supporting any colleagues who raise an issue relating to harassment or bullying.

Managers have a particular responsibility to foster an inclusive culture by:

- setting a good example by their own behaviour;
- ensuring that employees feel supported;
- making sure that employees know what standards of behaviour are expected of them;
- intervening to stop bullying or harassment; and
- reporting promptly via the relevant channels any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them.

Where can I go to for help?

- if you believe you are being bullied, harassed, or discriminated against, this includes interactions with customers or suppliers of CETIN, the Group or any other third party, you should raise a concern in accordance with our Code.
- CETIN will take all complaints seriously and seek to deal with them promptly.
- The details of any action taken against the perpetrator as a result are usually confidential as between them and CETIN.
- Every effort will be made to ensure that anyone who makes a complaint about bullying, discrimination or harassment in good faith will not experience any detriment or be victimised because of making such a complaint.
- Any complaint of victimisation will be dealt with seriously, promptly and (so far as practicable) confidentially.

Drugs and Alcohol

CETIN has a zero-tolerance policy regarding substance abuse of any kind, including the use or possession of illegal substances or alcohol abuse. All employees are prohibited from being at work or on company business while under the influence of alcohol or other illegal substances. Further, CETIN prohibits weapons on the premises of the company or used by it, consistent with applicable laws.

Health & Safety

We are committed to providing a safe and healthy working environment for our employees and safeguarding the safety and well-being of our customers, partners and the communities in which we operate.

We expect all employees and third parties working for or on our behalf to abide by the health and safety rules and regulations, and to intervene if they see any practices that are dangerous or unsafe.

We understand it is our collective responsibility to report incidents, hazards, and near misses in a timely manner to support learning and prevention, and to report any violation of health and safety that may put others at risk immediately.

Our Business Principles

Our brand and intellectual property

We have recognised and valuable brands in the markets in which we operate, and we must take steps in protecting these valuable assets. We can protect our brands by complying with our applicable brand guidelines and reporting any suspected misuse of our logos and trademarks, including any unauthorized use, piracy, or misappropriation.

We should not allow any third parties to use our brands or logos without proper authorisation or consultation with the legal team of CETIN. Our intellectual property (such as trademarks, copyrights, know-how, patents, trade secrets, research, technical data, etc.) and confidential information that belongs to the Group and/or third parties is a valuable asset which, in many instances, sets us apart from our competition. If we do not exercise care or fail to protect and properly record this intellectual property, then we risk damaging the actual or potential value of or otherwise losing these assets.

Be aware of and safeguard any intellectual property and confidential information that is in your possession, whether it belongs to CETIN, the Group or a third party. The intellectual property of third parties can only be used with proper authorisation.

The penalties for infringement of either copyrighted materials (including software) or trademarks or other intellectual property of third parties are significant: failure to safeguard any intellectual property and confidential information can subject you, CETIN and the Group to legal and regulatory proceedings that may result in civil penalties (fines) and/or criminal penalties. Unauthorized uses of intellectual property and confidential information can also cause loss of revenue, remediation costs and damage to our reputation.

Please be aware that you remain bound to maintain confidentiality even after the end of your employment at or cooperation with CETIN in accordance with applicable legal or contractual requirements. All products and content that have been created while working for CETIN are the sole property of CETIN, subject to applicable legislation and relevant legal standards.

No products and contents may be reproduced in any form, downloaded by any other means or incorporated into any information retrieval system other than for official use, without CETIN's prior written permission.

Our Confidential Information

Confidential information shall be used only for CETIN purposes and should not be disclosed to anyone outside CETIN or the Group, as applicable. When sharing information internally, only do so on a strict need-to-know basis.

When sharing confidential information externally, you should protect such information by sharing it only with authorized parties in a secure way (e.g., under the terms of an approved agreement). Please exercise caution when discussing confidential information in public places where you may be overheard.

Please refer to the internal policies of CETIN for more details on how to treat confidential information and practices relating to the security of our systems and the confidential information that is stored on them.

You must not input, upload, or share any personal, non-personal, copyrighted or confidential information into CETIN, the Group or third-party AI tools or platforms without prior authorisation and ensure such information is processed in strict compliance with applicable regulations and policies, and protected from unauthorised access, collection, and misuse.

You should not share company emails to your personal private emails and (where technically possible) avoid the use of personal USB sticks or external hard drives to save or transfer company confidential information without obtaining appropriate approval, as per the internal policies and security requirements of CETIN.

You are expected to respect any confidentiality obligations applicable to you that relate to information under your control. Keep in mind that the use of any intellectual property or confidential information that belongs to CETIN might constitute a contractual breach and might lead to disciplinary or legal action.

You must immediately report the loss of any misplaced confidential information.

Assets

Our assets include everything that CETIN owns or uses to conduct business and serve our customers and society in the best way possible. Each of us is entrusted to apply due care and good judgement when using these assets. Be prudent when using CETIN's assets as you would use your own. Careless, inefficient, or illegal use of CETIN's assets is detrimental to the business.

Information technology assets

To protect our information technology assets, such as networks, computers, programs and data from attack, damage, theft or unauthorised access by others, make sure you follow the processes and applicable internal policies and security procedures that CETIN has in place.

Financial assets

To ensure accurate use of our financial assets, make sure all expenditures are appropriately approved and accurately recorded in accordance with CETIN's processes and procedures.

Insider trading

As an employee of CETIN, you might be exposed to material and non-public price-sensitive information that influences someone to buy, sell, or hold securities of our shareholder(s) or third parties. Please keep in mind that the use of such information is prohibited and punishable by laws applicable in the countries in which the Group operates and may subject you to disciplinary and personal legal action that may risk imprisonment and/or monetary fines. We each have a duty to protect inside information and comply with applicable internal policies in relation to insider information and/or trading.

Our responsibilities

We each have a duty to look after and respect all of CETIN's assets. We should protect CETIN's assets from misuse, theft and waste. You can do this by:

- Always using CETIN resources responsibly and appropriately;
- Ensuring hardware, such as laptops, phones and other handheld devices, are never left in public or insecure places;
- Only using software that has been properly licensed and approved by the appropriate department for use. The copying or use of unlicensed or "pirated" software on CETIN's or Group computers or other equipment is strictly prohibited;
- Reporting any suspicions you may have concerning theft, embezzlement or misappropriation of any CETIN property;
- Respecting and acknowledging the copyright and intellectual property of others, obtaining the appropriate consent or permission to use the intellectual property in our products, services and activities; and
- Ensuring business expenditure is accurately and honestly accounted for.

Social Media

Please act responsibly when discussing current affairs and expressing your opinion on social media. Remember to always 'be yourself', and if you do express opinions, you should clearly mention that anything you state reflects your personal opinion and not those of CETIN.

In this digital age, the lines between public and private, personal and professional are often blurred in the usage of social networks. By virtue of identifying yourself as an employee of CETIN within a social network, you are connected to your colleagues, managers, and even our clients. We should remember that whilst we all have freedom of speech, that does not mean freedom from its consequences, including those relating to the Group.

You should ensure that content associated with you is consistent with your work at CETIN – this includes pictures, followers, and retweets – and also is consistent with local data privacy rules concerning information you intend to share about your colleagues, managers and/or clients. If you identify yourself as a CETIN employee and link back to a corporate X tweet, Facebook page, LinkedIn page, or other social network platform, ensure that your profile and related content is consistent with applicable laws (including data privacy) and with how you wish to present yourself with colleagues and clients.

You should not engage in any conduct that would not be acceptable in our workplace (e.g., use of racial or ethnic slurs, personal insults, obscenities, or similar language not acceptable at work) or which is in breach of this Code. You should not post anything on social media that is of a discriminatory nature or would constitute a threat, intimidation, or any other form of harassment or discrimination. Never discuss our business performance or other sensitive matters publicly in any online social platform, even if you are expressing your own opinion and using a disclaimer. You should not cite or reference clients, partners or suppliers without their and our written approval.

Complying with legal and regulatory rules and standards

Doing what's right is at the heart of how we work. We follow all applicable laws, rules and regulations in the countries in which we operate, as well as CETIN policies and procedures, and when there is a choice, we take the higher standard. We act independently and in the best interest of CETIN and its stakeholders. If something feels wrong, unclear, or does not align with our codes and policies, please reach out and ask for advice from the Ethics & Compliance Officer or your line manager.

Bribery & Corruption

We win new business and maintain our business relationships because of what we offer, not because of improper payments or favours. Acting with honesty and fairness is essential to maintaining trust with our customers, partners, and communities.

Bribery and corruption damage reputations, distort fair competition, and can result in severe penalties for both individuals and CETIN. That is why CETIN and the Group it belongs to strictly prohibit any form of bribery or corruption – whether giving, accepting, or requesting something of value to improperly influence a business decision.

We Do:

- Conduct all dealings with fairness, transparency, and integrity
- Follow anti-bribery and anti-corruption rules and complete all required trainings
- Keep clear and accurate records of all payments and transactions
- Perform due diligence before engaging third parties or intermediaries
- Report any suspected bribery, corruption, or improper conduct immediately
- Refuse improper requests and seek guidance when in doubt

We Don't:

- Offer, request, or accept cash, gifts, or anything of value to influence a business decision
- Make “facilitation payments” to speed up routine government or business processes
- Use intermediaries to engage in actions we are not allowed to take directly
- Ignore or overlook warning signs of bribery or corruption
- Retaliate against anyone who raises bribery or corruption concerns

Certain external activities, such as charitable initiatives, community partnerships, or participation in industry groups, carry reputational and compliance responsibilities.

Employees who lead, approve, or support these activities are expected to understand and apply the ethical standards outlined in internal policies.

While all employees receive general ethics training, those involved in external or public-facing activities may be required to complete additional training related to third-party risk and reputational responsibility, as may be outlined in the internal policies of CETIN.

External organisations that receive support, public recognition, or formal engagement from CETIN must be reviewed and approved in accordance with internal procedures to ensure legal compliance and consistency with CETIN's values.

Know and follow the rules on gifts, entertainment, and hospitality

Gifts, entertainment and hospitality can support healthy business relationships when handled properly, but they must never influence or appear to influence our business decisions or actions. For the purposes of this Code, a gift represents anything that, regardless of its content and form, can usually be considered valuable, and which, without any doubt, is presented as a gift, *i.e.* without the expected corresponding counter-value.

All gifts, entertainment, and hospitality must have a clear business purpose, be reasonable and infrequent, and follow approval and reporting requirements. You should never ask for a gift, nor offer or provide any gift to a person to influence their decision. Further, you should not accept any gift or favour if it might create a sense of obligation, or favouritism, or comprise your professional judgement or appear to do so.

In accordance with standard market practice in relation to CETIN's activities, we have established a threshold value of EUR 300 (or the equivalent in another currency) for the purpose of prior mandatory approval of gifts to be received by members of CETIN or provided to persons outside the Group. A higher threshold than EUR 300 (or the equivalent in another currency) can exceptionally be set, where approved on a case-by-case basis by the Chief Executive Officer of CETIN Bulgaria and/ or the Chief Legal Counsel of CETIN International, but it must always apply that such gifts are provided in accordance with standard market practice in relation to the activity or activities concerned. All gifts exceeding the abovementioned threshold of EUR 300 are subject of mandatory registration regarding their nature, the identity of the donor or recipient, as well as all circumstances that can be considered essential in connection with the gift (especially the reason and purpose of receiving/ giving the gift).

We Do:

- Record and seek approval before accepting or offering business courtesies, including via a gift and entertainment register
- Politely decline gifts, entertainment, or hospitality that are excessive or unrelated to business
- Check whether the person or company involved is in an active tender, negotiation, or approval process before accepting or giving anything
- Keep gifts, entertainment, or hospitality infrequent and proportionate to the relationship
- Ask for advice if unsure about the appropriateness of a gift or invitation

We Don't:

- Accept personal favours, discounts, or services that are not available to others
- Offer or receive travel, accommodation, or event tickets unless pre-approved and directly related to a business purpose
- Provide or accept gifts of money or monetary equivalent (including cash, vouchers or cryptocurrency)
- Provide or accept gifts, entertainment, or hospitality for family members or friends who are not part of the business relationship, unless pre-approved
- Ignore how an offer might look to others, even if you believe it won't affect your judgment
- Hide or fail to declare gifts, entertainment, or hospitality

For more information on providing and receiving gifts, entertainment and hospitality in an acceptable manner, please consult the Group's applicable internal policies in relation to gifts, entertainment and hospitality. Third parties should refer to the Supplier Code of Conduct.

Avoid conflicts of interest to the greatest extent possible

A situation may occur where your personal interests are inconsistent or interfere in any way with the interests of CETIN and your duties/obligations as an employee of CETIN.

There are a number of situations that might constitute a conflict of interest, and these situations are often unique. CETIN's internal policies will guide you on how to identify conflicts of interest and guide you on how to avoid them, or otherwise, once existing, to disclose, mitigate and resolve them. Avoidance is key, so members of CETIN need to be vigilant of any actions or relationships that create or even have the appearance of creating actual or potential conflicts of interest (involving either yourself or another employee). We have provided examples below to help navigate the potential for conflicts of interest.

Employees are required to regularly declare via the appropriate internal channels any changes in their circumstances, either in the future or otherwise, which may result in actual or potential conflicts of interest. Failure to comply with CETIN's policies relating to conflicts of interests may result in disciplinary and legal action being taken wherever appropriate.

We Do:

- Make decisions based only on what's best for CETIN, free from personal influence
- Step aside from decisions where our impartiality could be questioned
- Update our disclosure whenever personal circumstances change
- Follow controlling conditions to manage disclosed conflicts
- Seek guidance whenever unsure if something might be a conflict

We Don't:

- Use our position or influence to benefit ourselves, family, or friends
- Take on outside work or roles that compete with or interfere with our responsibilities at CETIN
- Use CETIN resources or confidential information for outside work or personal gain
- Fail to disclose personal interests that could impact or appear to impact business decisions
- Ignore how something might look to others, even if you believe it is harmless

Following import, export, and trade compliance rules

For CETIN, it is essential to know and comply with the applicable sanctions laws and import, export, and trade control laws that govern the global trade of our goods, services, and technical information. You need to understand and comply with the regulations and restrictions on dealings with certain countries, entities, and individuals pursuant to national and international trade sanctions laws that apply in the jurisdictions where CETIN conducts, or plans to conduct, business, or procures goods, services, and technical information. Those include directives, regulations and other relevant acts of (among others) the European Union that are relevant to sanctions and inform

our internal procedures relating to transactions, as have been transposed in our EU countries of operation.

Prevent money laundering

Money laundering is a process by which individuals or entities attempt to conceal or disguise the true nature, source, or location of illegal funds, or to make them appear legitimate.

We all need to ensure that CETIN does not facilitate such activities, and that involves the diligence and attentiveness of the employees of CETIN.

Therefore, everyone working for and with CETIN must take reasonable steps to determine the origin of funds he/she receives or procures and the identity of the ultimate beneficial owner of these funds to whom CETIN makes payments to or receives payments from.

We must always keep accurate books and records.

Be watchful for any payments that look irregular or for customers who appear to lack integrity in their operations. Most countries have laws prohibiting money laundering.

These laws often place criminal liability on both the individual employee as well as the company by whom they are employed.

Data protection and data privacy

We are committed to safeguarding the right to privacy and the protection of personal data of our customers, employees, and business partners. CETIN complies with applicable data protection laws and is committed to being transparent about how it collects, processes and retains the personal data of its workforce and stakeholders (ensuring that personal data is processed in a fair and lawful manner), in order to meet its data protection obligations, including with Regulation (EU) 2016/679 (General Data Protection Regulation) (GDPR) as is applicable to CETIN within the European Union.

We handle personal data with due care, by implementing technical and organisational security measures to prevent accidental or unlawful destruction or disclosure of personal data, and limiting the access of personal data to those who are appropriately authorised, in accordance with applicable laws and for legitimate business purposes only. We all have a role to play in protecting people's personal data. Make sure you understand your legal obligations under the applicable data protection laws. Ask the Data Protection Officer (DPO) or the Information Security Director if you are unsure.

Our responsibilities:

- Undertake data privacy and information security training, with the aim of having such training occur annually;
- Be accountable for protecting personal data and stay informed about our personal data-related policies;
- Promptly report any actual or suspected unauthorized uses, disclosures or access to the DPO or the Information Security Director;

- Limit the collection and processing of personal data to legitimate business purposes in line with local laws and retain personal data only as long as needed and in accordance with CETIN's policies;
- Be transparent about our privacy practices and how individuals can contact CETIN with questions or concerns, or requests related to their data within our systems; and
- Only share personal data with those who have a legitimate need to know and whose access is appropriately authorized.

Doing Good is Good Business

Doing good is good business means operating as responsible global citizens while conducting business with integrity, accountability, and transparency. By improving the lives of our colleagues, customers, communities, and the environment where we operate, we create sustainable value that benefits society and strengthens our company.

Our dealings with the supply chain

The Group is committed to doing business responsibly with the highest standards of ethics and integrity. We expect that our partners, suppliers, consultants, contractors, agents, and third parties to apply the same standards.

To protect our reputation and ensure alignment with our values, we carry out thorough registration, due diligence, and engagement processes before working with any third party. We do this to responsibly manage the wider impact our business has on communities, society, and the environment.

We have the Supplier Code of Conduct in place, which is available on the CETIN [website](#), which sets out the responsibilities of our suppliers and obligations towards ethical procurement and doing good. All of our suppliers are encouraged to ensure their own suppliers and subcontractors are made aware of the principles of the Supplier Code of Conduct when undertaking any work, or providing any product or service to, or on behalf of CETIN.

We are committed to ensuring all workers in our supply chain receive fair and equal treatment, in full compliance with the laws, rules, and regulations of the countries in which it conducts businesses and operations. If you suspect that a supplier has breached the Supplier Code of Conduct, you should contact the sourcing team at CETIN or, alternatively, use the Speaking Up process to escalate your concerns.

The Group respects human rights

We understand that while governments and national authorities have a duty to protect the human rights of their citizens, **doing good is good business**, also means respecting the fundamental rights of every individual touched by our operations. We are committed to ensuring that all workers in our supply chain receive fair and equal treatment, in compliance with the laws and regulations of the countries where we operate.

We align our approach throughout our business operations with internationally recognised frameworks, including the EU Charter of Fundamental Rights, the International Bill of Human Rights and the principles concerning fundamental rights set out in the United Nations Guiding Principles on Business and Human Rights, together with human rights principles that exist in legislation in the countries in which the Group operates.

We strive to ensure that we are not complicit in human rights abuses and seek ways to honour the principles of internationally recognised human rights. The Group and any CETIN company do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labour), physical punishment, forced or prison labour or human trafficking.

We are committed to ensuring all workers in our supply chain receive fair and equal treatment, in full compliance with the laws, rules, and regulations of the countries in which it conducts businesses and operations.

We strongly prohibit the use of any form of forced, bonded, compulsory labour, physical punishments, slavery, or human trafficking in any part of our supply chain.

If you suspect a breach of the Supplier Code of Conduct or our principles on human rights, you should contact the procurement team or alternatively use the Speaking Up process described below to escalate your concerns.

The Group and the environment

Everyone who is working for and with CETIN or the Group is expected to integrate environmental considerations in their day-to-day operations and strive for continuous improvement by minimising any adverse effects of their operations on the environment.

We commit to protecting the environment and minimising the use of finite resources (such as energy, water, and raw materials) and the release of harmful emissions to the environment (including waste, air emissions and discharges to water).

We comply with relevant national and international legislation and standards and set global policies. In countries we operate, where environmental legislation is not evident or enforced, we will ensure that responsible practices for managing environmental impacts are in place.

We work with customers, suppliers, and contractors to develop products and services to minimise the impact we have on the environment and maintain stakeholder confidence by being open and responsive to the concerns of customers, regulators and the local communities in which we operate.

You can do your part to support our Group commitments to the environment by:

- Reducing waste, energy, and emissions to air and water.
- Handling chemicals in an environmentally safe way.
- Handling, storing, and disposing of waste in an environmentally safe manner.
- Contributing to the recycling and reuse of materials and products.
- Avoiding unnecessary travel to reduce your carbon emissions by using videoconferencing where possible.

Ethical Decision Making

Our Code provides you with an overview of the legal, regulatory, and ethical rules and standards essential to achieve the Group's objectives and uphold our values.

Our Code is not a substitute for your good judgement; it is not designed to cover every possible scenario you may encounter. It is down to you to put these values and behaviours into action.

When faced with tough choices or grey areas, to help you or your team decide if you're making the right decision, you should ask yourself the following questions:

- Is this legal and ethical?
- Is this in line with our Code of Conduct?
- Is this right for our customers and the community?
- Am I treating others the way I would want them to treat me?
- Would you be proud to tell others about your actions?
- Would you feel comfortable if your actions were made public in the media?

If you answer 'no' to any of these questions, or if it is still unclear what to do, please ask for advice from your Ethics & Compliance Officer, the Group at compliance@andppftelcom.eu, or otherwise consult the respective section of our Code or relevant policies.

Remember, you should take action once you have made a decision. If you see an issue or something that isn't right – don't stand by, and if you are unsure what to do, please ask for advice.

Speaking Up

At CETIN, we are committed to the highest possible standards of openness and accountability. If you suspect anything illegal or unethical, we expect from you and encourage you to immediately report such suspicions, because any deviations from or violations of the Code are not accepted. We take reports of wrongdoing very seriously.

CETIN has implemented appropriate reporting channels for whistleblowing complaints, in line with the local implementations of the Directive (EU) 2019/1937 (Whistleblowing Directive).

There are a number of ways Speaking Up to raise your concerns at CETIN:

- Speak to your line manager as your first point of contact – we encourage you to consult with your line manager on any issue first.
- Speak with the Ethics & Compliance Officer on any questions you may have regarding the application of our Code of Conduct.
- If you are not sure how a particular section of our Code relates to any issue you may be experiencing, please reach out to compliance@andppftelecom.eu.
- You can also raise a concern in confidence via multiple whistleblowing channels – please refer to the whistleblowing policy applicable at CETIN for more details.
- Additionally, you may refer any concerns on an anonymous basis via the official whistleblower module, to the Group Ethics and Compliance Department at whistleblower@eandppftelecom.eu, or by phone to the Group Chief Legal & Regulatory Officer of e&PPF Telecom Group at +420 725 491 303.
- Please also refer to the Whistleblowing Policy for details concerning the making of any whistleblowing claims.

All reports will be kept confidential to the extent practical, except where disclosure is required by applicable law or court order. For more information, kindly refer to the internal policies that CETIN has in place. We appreciate those who speak up. Asking a question or reporting a suspicion shows that you are trying to do the right thing.

Remember that you have the right to remain anonymous, so your identity does not need to be revealed. Should you wish to disclose your name, however, and subsequently experience any form of retaliation or harassment, CETIN will investigate and take appropriate action.

Zero Tolerance for Retaliation

You should feel free to report any suspected violation of the law, internal policies of CETIN or this Code without fear of retaliation or any negative impact on your relationship with the Group or any CETIN company. Retaliation in any form, in response to a report for raising a concern, filing a report or cooperating in an investigation, is completely unacceptable and undermines the purpose of our Code. Anyone who, in good faith, raises a question or files a report about a suspected violation or non-compliance of our Code shall be protected against any acts of retaliation, even if the issue or report is ultimately unsubstantiated, in line with the Group Whistleblowing Policy. Retaliation against anyone who, in good faith, participates in any investigation likewise is prohibited. If you believe you have suffered retaliation or reprisal, report the matter to the Ethics & Compliance Officer, or utilise any of the whistleblowing reporting channels as described above.

False or malicious allegations

An individual that uses CETIN's internal policies and the procedures in our Code to make deliberately false and/or malicious allegations about a colleague or manager, or as a form of bullying against a colleague or manager, will be subject to disciplinary action that could result in termination of employment.

Frequently Asked Questions (FAQs)

How am I expected to use our Code of Conduct?

We expect you to behave in an ethical manner in your actions and decisions. This means complying with the principles and rules in our Code and fulfilling your legal and regulatory obligations. Take the time to understand our Group values and use the principles set out in our Code in your day-to-day work. Let someone know if you feel a working practice is not ethical or safe, or if it breaches our Code, by Speaking Up.

Where can I find all the policies referred to in our Code of Conduct?

All supporting policies and further information can be found on the internal network of CETIN. If you cannot locate the policy you are looking for, please reach out to your local Ethics & Compliance Officer or speak to your line manager, who will guide you or provide you with a copy. Additionally, you may reach out to Group directly at the following email address: compliance@eandppftelecom.eu.

What is the Whistleblower Hotline?

If you feel uncomfortable speaking to your line manager or someone else at work about any issue or concern, you can also report issues, concerns, or behaviour that you believe is not in line with our Code or established standards of behaviour via the whistleblowing channel. We encourage you to refer to the Whistleblowing Policy.

Additionally, you may refer any concerns on an anonymous basis via the official whistleblower module, to the Group Ethics and Compliance Department at whistleblower@eandppftelecom.eu, or by phone to the e& PPF Group Chief Legal & Regulatory Officer at +420 725 491 303.

If I make a whistleblower report in confidence or otherwise report it anonymously, will I get into trouble?

You can make any complaints in confidence or submit them anonymously without facing any consequences, however, you should remember if you do not leave your name, it may hinder the ability to effectively conduct an investigation and ask you for follow-up information. We encourage you to leave your name if it will help resolve the issue, and we assure you that your concerns will be handled confidentially and dealt with in a fair and balanced way.