

A1

Supplier

Code of Conduct

Dear business partner,

Business success and social responsibility must be connected. Responsible and ethical conduct towards employees, business partners, society, and the environment is an integral part of the A1 Group corporate identity, including those with the A1 Group affiliated companies. Compliance with laws and regulations in our business activities is an absolute priority.

To be recognised as a trustworthy business partner, we are internally governed by high ethical and work standards. Compliance is more than just a word for us. It is a value embedded in all the A1 Group activities. We expect the same from our suppliers and their partners within the supply chain.

Besides applying economic criteria, we carefully screen and evaluate our suppliers, subcontractors and workers across the value chain on compliance with laws and regulations, on ethical business practices, on social and environmental standards, on data privacy and security, on business continuity and disaster recovery and on reporting and compliance.

In the case of serious and repeated non-compliances, we are forced to cease our business partnership.

This document, the Supplier Code of Conduct (SCoC), builds upon the principles of internationally recognised standards for responsible corporate governance. These include the United Nations Global Compact (UN GC), the United Nations Sustainable Development Goals (UN SDGs), the Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD), and the labour and social standards of the International Labor Organization (ILO). A further pivotal driver of the A1 Group SCoC is the climate science and targets laid down in the Paris Climate Agreement.



The A1 Group SCoC and the standards it describes serve as the basis for a trust-based relationship, a relationship that not only fosters mutual success but does this in a responsible way, fulfilling the obligations towards society and the environment implied by our business conduct.

I invite you to join and support our ambition.

Your commitment counts!

Dr. Alexander Kuchar
CTO & Director Purchasing, A1 Group

Vienna, June 2025



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1. Introduction to Supplier Code of Conduct

The **Telekom Austria AG** (herein further “**A1 Group**” or “we”) is committed to conducting business ethically, responsibly, and sustainably, with respect to planetary boundaries. We believe that our suppliers play an important role in helping us achieve this goal and that we must work together toward creating a safe operating space for humanity.

Thus, the **A1 Group** requests that all our suppliers adhere to the highest ethical, environmental, and social standards when conducting business with us. .

Our responsible sourcing policy identifies the following sourcing objectives:

- Strengthen our economic performance;
- Securing the resilience of our supply chain;
- Contribute to A1’s sustainability commitments.

Our suppliers are our business partners and key players in delivering on the above objectives

Our **Supplier Code of Conduct** (herein further “**SCoC**”) sets out the principles and standards that all the **A1 Group** suppliers must follow when working with us to help us achieve responsible sourcing objectives. The A1 Group stands for economic inclusion and shall thus strive to support our SME partners in implementing ESG measures.

2. Standards and Policies

2.1 ‘E’: Environmental Standards

Our suppliers shall comply with all applicable environmental laws and regulations, including but not limited to those relating to the use and disposal of energy and water efficiency, hazardous substances, and waste management.

Our suppliers shall also implement policies and procedures to prevent environmental pollution.

Our suppliers shall be committed to minimizing their environmental footprint and ensuring that their operations are environmentally sustainable. .

The A1 Group is committed to achieving our NetZero target by 2040 across all scopes. Hereby, we encourage and invite all our suppliers to commit to the Net-Zero initiative and develop ambitious science-based decarbonization paths following the provisions of the Paris Climate Agreement and the 1.5-degree target.

We encourage our suppliers to embrace the principles of circular economy (i.e. the “9R Framework”) in the product design stage and focus on the product lifecycle, from the extraction of raw material to disposal. Hereby, we ask our suppliers to conduct Life Cycle Assessments (LCAs) and create long-term plans to extend the product lifespan (enhancing repairability, durability, resource efficiency and recyclability), also enhancing the climate efficiency of their products and services.

Our suppliers shall strive to drive their business using renewable energy and best-in-class low-carbon energy solutions.

Our suppliers shall work actively to reduce and minimize their impact on biodiversity by ensuring the integrity of native ecosystems and species abundance in the areas of supplier impact, as well as committing to limit operations out of protected and sensitive areas.

The **A1 Group** considers access to fresh and potable water as a universal human right and demands that our suppliers ensure free access to water to their employees and communities they operate in.r.

2.2 'S': Social Standards

All our suppliers must comply with applicable laws and regulations concerning labour, social security, and human rights.

Our suppliers shall respect the human rights of their employees and ensure that they are not subject to any form of human rights violations such as child labour and modern slavery (forced labour, debt bondage, human trafficking or forced marriage).

Our suppliers must ensure a safe and respectful working environment for their employees, strictly forbidding all forms of corporate punishment, including physical and emotional abuse or harassment. Our suppliers shall uphold ethical standards and protect the well-being and dignity of all their workers.

Our suppliers must promote a satisfactory balance between private life and work for their employees. Our suppliers shall comply with applicable local laws on maximum working hours and permit adequate time for rest and leisure for their employees.



Our suppliers must respect workers' rights to association and collective bargaining and maintain open communication channels for these discussions.

Our suppliers shall provide their employees with living wages and benefits, guarantee health and safety at work, decent working conditions, and inclusive and equal opportunities for all employees, regardless of and not limited by age, race, gender, religion, or sexual orientation.

Our suppliers shall take an active approach to eliminate conflict minerals from their supply chains and ensure responsible mineral sourcing.

2.3 'G': Responsible Corporate Governance

All our suppliers must comply with all applicable laws and regulations relating to anti-bribery, anti-corruption, anti-trust, and conflict of interest.

All our suppliers must maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

Ethical Business Practices

Our suppliers shall conduct business with the **A1 Group** honestly and ethically.

Our suppliers shall not engage in any corrupt, fraudulent, or unethical practices, including but not limited to bribery, kickbacks, or conflicts of interest.

Our suppliers are responsible for ensuring that their employees and representatives or other contracted parties do not engage in such fraudulent practices.

Data Privacy and Security

Our suppliers shall protect the confidentiality, integrity, and availability of all personal data and information they receive or process on behalf of the **A1 Group**.

Our suppliers shall comply with all applicable data privacy laws and regulations, including but not limited to those relating to the collection, use, storage, and disclosure of personal data. In addition, our suppliers shall implement the necessary measures to guarantee the confidentiality and security of personal data in their possession or to which they have access.

3. Responsibility for Workers and Subcontractors

3.1 Subcontractors and Suppliers

Suppliers must ensure that their subcontractors and suppliers comply with our **SCoC**. Suppliers must also be transparent with the **A1 Group** about their supply chain and the origin of their goods and services.

3.2 Workers across the value chain

The **A1 Group** created the [tell.me](#) portal. We encourage you to use this portal to report any issues relating to labour and unfair or unethical treatment of people associated with employees. We also encourage you to report environmental degradation or unethical business behaviour issues.

Throughout our investigations of high-risk suppliers, we commit to providing adequate information about the use and anonymity of this platform directly to the supply chain workers.

4. Verification of Compliance: Reports and Audits

4.1 Supplier Risk Assessment and Audits

The **A1 Group** invites partners to collaborate and engage with us in opportunities that benefit people and the planet.

We take a proactive stand to understand the risks associated with our supply chain in all three pillars of ESG. We are committed to working with partners to eliminate these risks.

The **A1 Group** is committed to the active monitoring of our supply chain. The monitoring applies to all our large and high-risk suppliers. After the risk identification, some suppliers might be invited to participate in a self-assessment or a third-party assessment.

Hereby, we notify our suppliers, who might be identified as “high-risk” suppliers based on our ESG risk assessment of the materials procured by the **A1 Group**, that, as an active member of JAC (Joint Alliance for CSR), the **A1 Group** engages in conducting on-site audits. Thus, our suppliers should note that they or their suppliers or subcontractors might be eligible for an audit to take place directly on the locations where goods provided to the **A1 Group** have been manufactured.

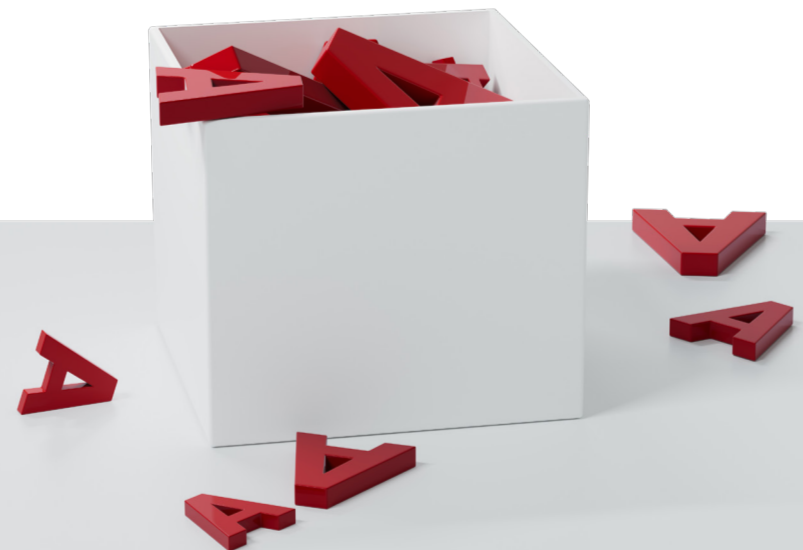
4.2 Reporting on Compliance

The **A1 Group** reports annually on internal and external audit results, pointing out the discovered non-conformities. Through a Corrective Action Plan (CAP), the **A1 Group** engages with non-compliant suppliers to resolve issues identified.

Our suppliers must promptly report any suspected or actual violations of our **SCoC** to the **A1 Group**. Our suppliers must also cooperate fully with any investigation conducted by the **A1 Group** into any such violations.

5. A1 Group rights in case of non-compliance

The **A1 Group** reserves all rights and may take any legal actions it deems necessary in case the supplier fails to comply with this **SCoC**, including but not limited to written warnings, management escalation or termination of the contractual relationship.



6. Conclusion

At the **A1 Group**, ethical, responsible, and sustainable business practices are the key to the long-term success of a business.

To be fit for the future, individually as the **A1 Group** and together with our partners within the supply chain, we expect all our suppliers to share this commitment and to conduct business with us in a manner that reflects our values.

We will work closely with our suppliers to ensure they understand and comply with our **SCoC**. We will continuously evaluate and improve our own practices to ensure that we are meeting our own high standards of ethical, environmental, and social responsibility.

7. Related Documents

In addition to the provisions of this **SCoC**, our suppliers shall adhere to the **A1 Group's** policies and guidelines. Relevant documents regarding sustainability in the **A1 Group's** supply chain can be found under the following links:

1. Sustainable Procurement overview | [Sustainable supply chain management](#)
2. Code of Conduct | [Code of Conduct](#)
3. Responsible Sourcing Policy | [Responsible Sourcing Policy](#)
4. Human Rights Policy | [Human Rights Policy](#)
5. DEI Policy | [Diversity_Equity_Inclusion_Policy](#)
6. Environmental Policy | [Environmental Policy](#)
7. Conflict Minerals Policy | [Responsible Mineral Sourcing Policy](#)
8. Sustainable Packaging | [Sustainable Packaging Guidelines](#)



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