



A1 Group Policy Capital-Market Compliance



Integrity is the Basis of Our Business.
honest. fair. transparent.

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The Most Important Capital-Market Compliance Stipulations at a Glance

Stipulations for all Employees:

- Insider information is publicly unknown, precise information that directly or indirectly affects one or more issuers of financial instruments or one or more financial instruments and which, if publicly known, would be likely to significantly influence the price of such financial instruments or the price of derivative financial instruments related thereto. 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. Even partial steps taken to complete a prolonged issue may constitute insider information. If the price impact expected from a public announcement is very high, the information in question must be classified as insider information even if the probability of occurrence is less than 50%.
- Trading in securities and derivatives and providing recommendations while taking advantage of insider information, cancelling, or changing an order for a trade or recommending doing so while taking advantage of insider information and disclosing insider information without operational necessity is prohibited and will be punished.
- The Capital-Market Compliance Officer, the Head of Investor Relations and the General Counsel must be involved early on in circumstances or projects that could lead to insider information.
- The Capital-Market Compliance Officer shall be informed immediately of the occurrence of insider information. The Capital-Market Compliance Officer shall be either consulted during decision-making in connection with possible insider information or otherwise informed immediately of all decisions of the Management Board concerning possible insider information.
- All persons who receive insider 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 insider information, as well as about all personal data required to be included on the insider-list.
- Insider information is subject to confidentiality. The disclosure of insider 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 Mio. 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 exceeding significantly 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, the existence of insider information and the necessity of ad-hoc release must always be checked.

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 insider 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 persons from 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 insider information may only take place upon simultaneously notifying the Capital-Market Compliance Officer.
- To protect the confidentiality of insider 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 compliance 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.group) and on their web platform of the Financial Market Authority (FMA) within a maximum of three 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 the 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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Inhaltsverzeichnis

Foreword	5
1 Introduction.....	6
2 Definitions.....	7
2.1 Financial Instruments.....	7
2.2 Insider Information	7
2.3 Insider	9
2.4 Market Manipulation.....	9
3 Legal Provisions on the Prohibition of Misuse of Insider Information and Capital-Market Abuse.....	10
4 Decision-Making on the Existence of Insider Information.....	11
5 Handling of Insider Information.....	11
6 Publication or Postponement of Publication of Insider Information.....	12
7 Insider-Lists	14
8 Classified Units of Confidentiality	15
8.1 Implementation of Classified Units of Confidentiality	15
8.2 Permanent Classified Units of Confidentiality	15
8.3 Temporary Classified Units of Confidentiality	16
8.4 Trading Ban and Trading Windows for Members of Classified Units of Confidentiality.....	16
9 Managers Transactions by Members of the Management Board, Supervisory Board and their Close Relatives	17
10 Capital-Market Compliance Officer, Ad-Hoc Committee.....	19
10.1 Rights of the Capital-Market Compliance Officer	20
10.2 Duties of the Capital-Market Compliance Officer.....	20
10.3 Ad-Hoc Committee.....	20
11 Monitoring und Sanctions	21
11.1 Monitoring	21
11.2 Sanctions.....	21
12 Questions and Notes on this Policy	21
13 Trading in America Móvil Securities	22
14 Final Provision.....	22
Annex 1: Capital-Market Compliance - Statement of Undertaking for Persons from Classified Units.....	23
Annex 2: Capital-Market Compliance - Statement of Completion and Undertaking - 1 st management level.....	24
Annex 3: Capital-Market Compliance - External Statement of Undertaking.....	25
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	26

Foreword

Our values are "Team, trust and agility". They guide us as we realize our vision of "Empowering Digital Life" for our customers and society. We actively assume ecological, social and environmental responsibility and see "Environmental, Social & Corporate Governance" (ESG) as a long-term 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 insider information have to be informed on a regular or occasion-related basis about:
 - the prohibition of misuse of insider information.,
 - the prohibition of market manipulation,
 - the handling and disclosure of insider 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 or delaying 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 organisational 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 insider information on a regular or occasion-related basis.

Each employee has to inform a business partner, with whom a contractual relationship is entered into, who will receive insider 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 compliance 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 an 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 Insider Information

Insider information is publicly unknown, precise information that directly or indirectly affects one or more issuers of financial instruments or one or more financial instruments and which, if publicly known, would be likely to significantly influence the price of such financial instruments or the price of derivative financial instruments related thereto (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 insider information even if the probability of occurrence is less than 50%.

Even partial steps taken to complete a prolonged issue may constitute insider information if they meet the criteria for insider information on their own. Therefore, they have to be evaluated separately. In case of doubt, the Capital-Market Compliance Officer must be consulted.

Examples of insider 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 insider 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, for example, members of the management board or supervisory board, lawyers, auditors, tax consultants, PR-agencies, representatives of major shareholders, and persons in the classified units of confidentiality. By way of extension, a primary-insider is thus someone who has obtained the information by committing criminal acts.

A secondary-insider has insider information by chance, from a primary-insider or from another third party and knows or must know that this is insider information. Secondary-insiders are, for example, listeners of a conversation in the elevator, employees of an external printing shop 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 pretenses 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 to 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.

An insider trading occurs when a person possesses insider 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 insider 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 insider information. If a transaction was commissioned prior to the existence of the insider 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 insider 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 insider information occurs when a person in possession of insider information passes this information on to third parties without operational necessity (need-to-know principle).

The exchange of insider 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 insider 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 insider information as possible and to accept it. Secondary insiders can be punished only if they are aware of the existence of an insider information.

4 Decision-Making on the Existence of Insider 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 insider information. To enable a thorough and timely analysis, they must be included in an advisory capacity early on in circumstances or projects that could lead to the obligation to make an ad-hoc release. The decision about an ad-hoc release or its postponement 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 insider information.

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

- significant changes in strategy,
- M&A transactions with an expected transaction value of more than € 200 million,
- changes in the Management Board,
- 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 purpose of having some trigger events described in more detail should help and provide valuable hints when it comes to making the accurate decisions. However, knowing that this does not relieve to consider any other potential relevant event which may qualify as insider-information obligating the issuer to disclose it.

5 Handling of Insider Information

Any employee who first becomes aware of insider 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 insider 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, the insider 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 the strictly necessary extent and the number of persons concerned with insider information should be kept as low as possible. In case of doubt whether there is insider information or whether the passing on of insider 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.

Insider 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 insider 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 insider 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 insider 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 insider information, documents, or external data carriers. Cabinets in which such pieces of documentation (documents, external data carriers) are kept are to be kept locked.

In a modern office architecture, members of classified units of confidentiality should choose their workplace in such a way as to ensure confidentiality of insider 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 insider information is processed or stored must be protected by usernames and passwords. Employees who use applications with insider 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 PC access from home may only save files and programs on the 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 employee, and which is in line with the respective security policy (VPN-access). 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 Workplace are available to a network of recipients that cannot possibly be limited in advance. It must therefore be assumed that information that is placed on 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-markets 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 insider 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 or Postponement of Publication of Insider Information

Telekom Austria AG must immediately notify the public of any insider information directly related to it, irrespective of the trading hours of the stock exchange or can postpone the publication provided the legal prerequisites are fulfilled. All significant changes with regard to already disclosed insider information must be announced immediately after the changes occur.

The publication of insider information takes place simultaneously to the Vienna Stock Exchange and the Financial Market Authority (FMA), and half an hour later to at least two news agencies (Bloomberg, Reuters or Dow Jones). If insider 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 insider 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 insider information, there are no restrictions on passing this information on with regard to capital-market regulations.

Telekom Austria AG may postpone the publication of insider information if

- such disclosure could affect its legitimate interests and
- such postponement is not likely to mislead the public and
- Telekom Austria AG is able to ensure the confidentiality of the information

Telekom Austria AG may also postpone disclosure in the event of a process stretched over time and consisting of several steps. Legitimate interest exists in particular in case of

- ongoing negotiations or related circumstances, where the outcome or normal course of such negotiations would be likely to be affected by publication,
- a multi-stage decision-making process, if immediate disclosure with simultaneous indication of a lack of consent would endanger the correct evaluation of the information by the public.

If Telekom Austria AG postpones the publication of insider information, it must document the following information in addition to maintaining an insider list:

- the content of insider information (title, text),
- the reason for the postponement,
- the date and time of the decision to postpone publication,
- a list of all persons who are responsible for the decision on the postponement.

The postponement of publication leads to the fact that insider information cannot be processed in the market and is therefore not included in the stock price information. However, this does not lead to any misleading. Such a risk exists only if information or rumours and speculation are circulating on the market, which, taking into account the behaviour of the issuer, arouse ideas that are bogus when considering the insider information. It is therefore necessary to examine whether rumours or speculation are based on true insider information or not. If there is a link, publication must take place immediately.

Within the A1 Telekom Austria Group, appropriate measures must be taken to ensure that persons only have access to insider information to the absolutely necessary extent to which such information is essential for performing their duties within the company (need-to-know principle). The 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 the confidentiality can no longer be guaranteed, the insider information must be published immediately.

The postponement of the publication of insider information is temporary. As soon as one of the above-mentioned conditions ceases to exist, the obligation to publish applies again and Telekom Austria AG must make the disclosure or subsequent publication immediately. The decision on the postponement must be constantly monitored and challenged. The object of subsequent publication is the current state of the original insider information at the time when the obligation to make subsequent publication arises. A postponement does not necessarily lead to the subsequent disclosure. Instead, subsequent publication depends on whether there is still any insider information required to be disclosed at all. If, for example, contract negotiations fail during a postponement, there is no obligation to inform of the failure, provided the market was previously not informed about the negotiations.

If Telekom Austria AG has postponed the disclosure of insider information, it must inform the FMA (marktaufsicht@fma.gv.at) immediately after the publication of the insider information on the postponement of the disclosure and, at the request of the FMA, explain in writing to what extent the conditions for postponement were fulfilled.

The insider information to be published must be clearly referred to as "insider 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 insider information to be published (which must be concisely formulated) and the release date of the insider information.

If insider 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 addressee.

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 insider 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 insider information if such persons perform their duties for A1 Telekom Austria Group based on an employment contract or otherwise and thus have access to insider 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 insider 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 insider information stating their first and last name (including name at birth if different), date of birth, all business and private telephone numbers (landline and mobile), all residential addresses as well as precise time and reason for inclusion of the person on the insider-list,
- 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 (landline and mobile),
- other information concerning the disclosure of insider 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 they have been created or last updated.

The insider-list must be created using the default template of the Implementing Regulation (EU) 2016/347. 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 insider 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 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 insider 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 insider 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 insider information of Telekom Austria AG regularly or for a special purpose can be included directly in the insider-list of Telekom Austria. 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 insider information on a regular or occasion-related basis.

Permanent classified units of confidentiality are thus to be formed where insider information typically occurs in the relevant unit or at groups of persons concerned. This is to ensure that confidential and stock price sensitive information – regardless of whether (already) insider 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.

Persons with access to insider 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 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, insider 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 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 Newsroom
- A1 Telekom Austria AG Corporate Newsroom
- A1 Telekom Austria Group Corporate Communications
- 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.

In the event of changes in strategy, M&A transactions with an expected purchase price of more than € 200 million, personnel changes in the Group Management Board, a deviation in total revenues of more than € 130 million per year or CAPEX of more than € 150 million per year from the investor guidance, any change in the dividend announcement that exceeds significantly the level expected by the capital-market, capital increases, impairments required under IFRS of more than € 75 million, as well as deviations from capital-market expectations in EBITDA or extraordinary effects in free cash flow cash flow of more than € 75 million per year, the establishment of a temporary classified unit of confidentiality must be examined.

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 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 insider 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 insider 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, 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 scope of 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 the 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 the 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 A1 Telekom Austria Group 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.group) 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 a 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).

Reporting obligations are restricted to the above listed legal persons, fiduciary institutions (e.g. foundations) and partnership subjects in event of a merger, 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 a close relative takes part or influences the concrete decisions of this legal persons, fiduciary institutions (e.g. foundations) and partnership subjects to carry out transactions in financials instruments of Telekom Austria Group. With this teleological reduction, ESMA has significantly reduced the group of persons, legal entities, fiduciary institutions (e.g. foundations) and partnerships subject to managers' transaction reporting in the case of interdependencies, and so the obligation notification a managers' transaction is now dependent on the participation or (potential) influence of the Management Board member or Supervisory Board member of Telekom Austria AG, the management or Supervisory Board of Telekom Finanzmanagement GmbH or its related parties on relevant transaction decisions.

Telekom Austria AG must publish the report 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 (rudolf.schwab@a1.group) and the postbox managers.transactions@a1.group 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 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

- Rudolf Schwab
(phone no. +43 664 6639079 mail: rudolf.schwab@a1.group, his deputy is
- Doris Schönhart
(phone no. +43 664 6627837 mail: doris.schoenhart@a1.group).

10.1 Rights of the Capital-Market Compliance Officer

The Capital-Market Compliance Officer must be informed immediately of the first occurrence of insider 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 insider 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 insider 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 prepares regular reports for the Management Board of Telekom Austria AG.
- 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 insider 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 insider 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 guideline.
- 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 Guideline; 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 insider information. The members of the ad-hoc committee must be involved early on in circumstances or projects that could lead to obligatory ad-hoc releases.

The Management Board of Telekom Austria AG decides on the immediate publication or postponement of insider 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 the 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 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 – if desired also anonymously - to the A1 Telekom Austria Group [tell.me](#) whistleblowing-portal.

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 the HR 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.

Rudolf Schwab, Capital-Market Compliance Officer, is available:

Mobile: +43 664 66 39079

rudolf.schwab@A1.group

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 „[Policy for trading in AMX shares and other securities](#)“ of América Móvil in advance.

14 Final Provisions

This A1 Group Policy enter into force in January 2025 and replace all previous Capital-Market Compliance Policies.

The provisions of this Group Policy are to be interpreted in such a way that the greatest possible conformity is achieved with the literal meaning and purpose of the stock exchange law insider and compliance regulations.

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

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 February 2025), 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 all measures to ensure that insider information is kept confidential and with the stipulation regarding the 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:

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

Rudolf Schwab, Group Compliance
1020 Vienna, Lassallestraße 9,
rudolf.schwab@A1.group

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 February 2025), have read and understood them, and hereby undertake to comply with all of their stipulations.

I have made the Capital-Market Compliance Policy of A1 Telekom Austria Group (as of February 2025) known to all employees of 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.

As a member of a classified unit of confidentiality, I undertake, above all, to strictly comply with all measures to ensure that insider information is kept confidential and with the stipulation regarding the trading windows. The trading windows will be open during the 20-day period following the disclosure of the yearly, half-yearly or quarterly results respectively:

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

Rudolf Schwab, Group Compliance
1020 Vienna, Lassallestraße 9,
rudolf.schwab@A1.group

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

Name:
Date of birth:
Address:
Email address:
Company, adress
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 February 2025) and to inform (keeping proof thereof) my current and future employees as well as all third parties working for me 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.

.....

(Date, signature)

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

Rudolf Schwab, Group Compliance
1020 Vienna, Lassallestraße 9,
rudolf.schwab@A1.group

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 of confidentiality since:

Statement of Undertaking

I have read and understood the A1 Telekom Austria Group Capital-Market Compliance Policy (as of February 2025) 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 director's 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.group) 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
Rudolf Schwab, Group Compliance, Telekom Austria AG, rudolf.schwab@A1.group