



TELENET CODE OF CONDUCT



Introduction	6
What does it mean to treat a customer fairly?	8
Why is personal and customer data so important?	10
What are company assets?	12
What should I know about diversity and equal opportunities?	14
What behaviors are not acceptable and how can we keep the workplace respectful?	16
What do I need to know to ensure the safety of others and myself?	18
When should I not talk about the company?	20
Competition laws: What do I need to know when dealing with a competitor?	22
What do I need to know when choosing and maintaining a supplier?	24
What do I need to know about trade laws?	26
What do I need to know about accurate financial records?	28
How do I recognize corruption and bribery?	30
When can I offer and accept gifts and hospitality?	32
What is considered insider trading and how do I avoid it?	34
What should I do if I find myself in a potential conflict of interest situation?	36

No company is an island. We thrive and live by grace of our customers, our shareholders, our employees and the society in which we operate. We strive for sustainable growth, with a good balance between operational excellence and corporate responsibility.

At Telenet, we believe in the tremendous potential of digital and we are committed to help people and businesses to stay one step ahead in the digital age, embracing the endless possibilities of digital at the fullest and with pleasure. For a better quality of life.

As a company, we want

- to be close to our customers, offering them an amazing experience in the digital age
- to engage in an open and transparent way with all our stakeholders earning their trust
- our employees to feel the passion, to grow themselves and to succeed in a continuously changing working environment.

Our Code of Conduct defines how we act as individuals and how we interact with our colleagues, our customers, our business partners and with our broader stakeholder community. It lays the foundation for a strong company culture that responds to the highest standards of respect, business integrity and ethical conduct.

The Code of Conduct provides you with a clear set of business principles and core values that will guide you and support you to do your work to your best abilities.

Thank you in advance for embracing those principles and for living those values. Your commitment will allow us to make a positive contribution to the Belgian ecosystem and to build a digital society that propels us and helps us always stay one step ahead.



JOHN PORTER
CEO, TELENET

DOES THE CODE APPLY TO ME?

Yes, the Code applies to all of us, including every director, officer and employee of each company within the Telenet Group Holding.

In the Code, when we refer to the company, we mean each and every company, business unit or division within the Telenet Group Holding. Contractors, consultants, agents and vendors are also required to comply with the Code in their business activities with or on behalf of our company.

Violations of the Code, including violations of applicable laws, may subject our company and the individuals concerned to severe consequences. A failure to follow the Code that involves a criminal act could result in prosecution after referral to the appropriate authorities. Violations of the Code may also result in disciplinary action, including termination of employment.

HOW CAN I GET HELP AND GUIDANCE?

We have included practical guidance and relevant examples throughout the Code to help bring these important issues to life.

The Code does not address every legal requirement or ethical question that may arise, nor does it replace other more detailed company policies. If you have any questions about anything in this Code you should speak to your line manager in the first instance. If they cannot answer your question then your Compliance team (compliance@telenetgroup.be) will be able to help you.

HOW DO I REPORT A CONCERN?

If you become aware of, or suspect any conduct that you believe violates any applicable law, rule, regulation, company policy or other provision of the Code, you are required to report such improper conduct as promptly as possible.

You should report the matter directly to your Compliance team (compliance@telenetgroup.be) and your supervisor or management chain as appropriate. You may also report using the web-based reporting system (click [here](#)). The web-based reporting system is operated by a third-party and is available 24 hours a day, seven days a week.

We encourage open and honest communication. However, if you feel the need to communicate your concerns anonymously you may do so. You should be aware, however, that it is often more difficult to properly investigate matters that have been communicated anonymously.

Reports of violations will be kept confidential to the extent possible, consistent with our company's need to investigate and take action. Employees are also expected to keep information regarding such matters confidential and to fully cooperate with any such investigation.

We will not permit retaliation against any employee who, in good faith, reports, complains of, or seeks advice concerning the Code or other illegal or unethical conduct. If, however, an employee makes a false report of a violation or of questionable behavior for the purpose of harming another person, the reporting employee will be subject to disciplinary action.

WHAT DO WE EXPECT FROM OUR EMPLOYEES?

- Read and make sure you understand this Code. We are all responsible for protecting and maintaining the integrity of the company.
- Comply with the Code and all laws, rules and regulations applicable to your role.
- Act responsibly, ethically and with integrity in all your business dealings.
- Conduct business in a corporate social responsible way.
- Complete any training assigned to you on the Code or other company policies.
- Seek help and guidance where you have questions or concerns.
- Speak up if you think that there has been a breach of the Code or any other company policy.

WHAT ADDITIONALLY DO WE EXPECT FROM OUR MANAGERS?

- Model the behaviors and make decisions that are consistent with our Code.
- Ensure that any business process or practice is in compliance with our Code.
- Ensure that employees have adequate time to complete their training on the Code and other company policies.
- Reassure any team members who raise any questions or concerns to you that they are taken seriously and you will seek support from your Compliance, Legal or HR team.

WHAT DOES IT MEAN TO TREAT A CUSTOMER FAIRLY?

THE CONTEXT

Our company's scale and commitment to innovation enables us to develop market-leading products and services.

Our goal is to deliver an amazing customer experience for a better quality of life – this means delivering innovative products and services, and treating our potential, existing and former customers fairly and with respect. When interacting with our customers, our employees focus on the personal and human aspects to make each customer contact a meaningful, memorable and unique experience.

WHAT DOES IT MEAN FOR ME?

Ensure that every customer interaction (e.g. customer inquiries or sales attempts) is taken care of with passion and with a focus on sharing accurate and transparent information.

CAN YOU GIVE ME AN EXAMPLE?

Q A customer complains about how he has been handled by Telenet. What should I do?

A It is important to listen to the customer's complaint and make sure his question is properly taken care of.

Q A journalist is calling as a customer and is at the same time trying to get some information related to our procedures and way of working. What should I do?

A Take care of the customer's initial question and inform the customer that he can always contact our Corporate Communications department for further questions.

Q A customer is interested in buying a product for which a certain promotion just ended. What should I do?

A Engage in a sales conversation to understand the customer need and offer the right product. I also make sure that the customer fully understands the complete cost of the product.

Q I work in sales and a prospective customer asks if we can avoid completing a credit check. What should I do?

A It is important that credit checks are completed to protect both the customer and the company. You are trained on when credit checks are required – if you are unsure, consult your supervisor.

Q I have overheard one of my sales colleagues promising potential customers a free tablet if they take our services. There is currently no promotion like this and I think the agent is deliberately misleading customers to boost sales. What should I do?

A Misleading sales tactics are never acceptable. You should report the matter to your supervisor.

Where do I get help or guidance?
YOUR SUPERVISOR / MANAGER

WHY IS PERSONAL AND CUSTOMER DATA SO IMPORTANT?



THE CONTEXT

When our customers provide personal data, they put their trust in us to protect that data. The same applies for all of our employees.

It is therefore important that we all use our company's information systems in a responsible way and protect the personal data on these systems. These systems include computers, voicemail, e-mail and mobile devices.

Whenever personal data is collected we must ensure that it is kept private and safe, and treated in a way that is compliant with regulations.

Personal data includes names, addresses, birthdates, social security numbers, and for our customers, location data, IP addresses and other internet usage data and set-top box data.

WHAT DOES IT MEAN FOR ME?

Ensure that you have read and understood the internal and external Privacy policy, as well as the Cyber Security policy and have completed any training assigned to you.

If your role involves handling personal data, ensure that you understand and adhere to the relevant company policies and processes with regards to the collection, processing, storage and deletion of that data.

Only use personal data for a valid business purposes. You should never access personal data which is not required as part of your role in the company.

Personal data may not be disclosed to anyone unless such disclosure is properly authorized, and the data is required for a valid business reason.

CAN YOU GIVE ME AN EXAMPLE?

Q I have received an e-mail which contains a link to a free pass for a prestigious industry conference. I am concerned about the security risk posed by clicking the link. What should I do?

A Never click on links or open attachments from unknown sources. If in any doubt do not click on the link, report the email as phishing and/or forward the email to your Cyber Security team with a brief explanation of your concern.

Q I work in a contact center and I receive a call from someone who claims they are a relative of the account holder. They wish to cancel their services. Can I do this?

A It is important that we do not give out any account information or make any changes to customer accounts unless we are sure that we have the appropriate customer authorization. You are trained on what is required, if you are unsure, consult your supervisor.

Q I need to send some customer data to a colleague. What is the best way to do this?

A Consult Telenet's Privacy Office if you are unsure whether this transfer of data is authorized. If you do send personal data, you should always send this via an approved secure method (the Cyber Security team can advise on this).

Where can I find out more?

CYBER SECURITY POLICY, PRIVACY POLICY

Where do I get help or guidance?

CYBER SECURITY TEAM, DATA PROTECTION OFFICER

WHAT ARE COMPANY ASSETS?

THE CONTEXT

Company assets include:

Physical assets

Physical assets include office facilities, network and information technology equipment. Employees should protect the company's physical assets and use them solely for business purposes, except for limited personal use that does not interfere with our company's business and complies with all applicable company policies.

People

Our employees and the abilities and talent that they bring to our company are an asset. We must ensure that we protect our employees' time in the same way we protect our other assets and allow them to perform their duties while at work.

Data and information systems

It is your responsibility to maintain the confidentiality of any non-public information concerning our company and any non-public information provided to us by a third-party.

Intellectual property

Our logos, trademarks, designs, inventions and writings are valuable assets. We protect them through the use of patents and trademark registrations. We are also highly respectful of all intellectual property rights of others.

WHAT DOES IT MEAN FOR ME?

Keep your mobile equipment safe – don't leave laptops or mobiles in cars.

Treat employees' time as you would treat any other company asset and use it for company business only.

Keep personal use of information systems to a minimum. It is generally not our intent to monitor internet usage or messages on our voicemail or e-mail systems. However, the company reserves the right to do so in appropriate circumstances, where it is allowed by local law and in a manner consistent with applicable laws and regulations.

Company confidential information may not be disclosed to anyone unless such disclosure is properly authorized.

You may not disclose any former employer's confidential information.

If you are creating new products or services ensure that you talk to the Legal team about how these can be protected by patents.

If you want to use intellectual property created by someone else, e.g. technical designs, then you must consult the Legal team to obtain permission from the owner.

CAN YOU GIVE ME AN EXAMPLE?

Q My previous employer had developed some software that would help me do my current job a lot more efficiently. Can I get a copy of this from one of my friends at my old company?

A No. You would be infringing their intellectual property rights. If you want to use this software the correct legal agreements would need to be in place.

Q I accidentally left my company mobile phone on a train. What do I need to do?

A You should contact your IT Service Desk and your supervisor for advice on the process that you need to follow for lost devices.

Q I broke my personal mobile handset. My friend works in the mobile division and offered to give me a handset that they use for testing purposes.

A You should not accept your friend's offer. The handsets are company property and you should advise your friend that this would be theft of company property.

Where can I find out more?
CONTRACTUAL AGREEMENT

Where do I get help or guidance?
HR TEAM

WHAT SHOULD I KNOW ABOUT DIVERSITY & EQUAL OPPORTUNITIES?

THE CONTEXT

We are committed to equal opportunities for our employees and those seeking employment with our company.

Company employment decisions must be based on individual merit and business needs, irrespective of race, color, ethnic, cultural, community or national origin, religion, political or syndical opinions, sexual orientation/ identity, family or marital status, gender, current or future health situation/disability, or age.

This commitment extends to all aspects of employment including recruitment, hiring, evaluation, promotion, compensation, training, development and termination.

WHAT DOES IT MEAN FOR ME?

You should understand the recruitment and performance management processes and ensure you apply these fairly, making decisions based upon merit. Speak up about any views or concerns you have about potentially discriminatory behavior.

CAN YOU GIVE ME AN EXAMPLE?

Q I manage a store and have an applicant for a job who has a disability. I am concerned that their disability may mean customers don't want to deal with them. Can I put their application to one side?

A No. We recruit individuals who are the best people for the job and this individual's application should be considered on the same basis as all other applicants.

Q I would like to fill a vacancy in my team by promoting internally. The vacancy requires $\pm 50\%$ travel. I believe that one of the candidates would be great in the job but I am concerned to ask her about her availability to travel since I know that she has just become a mother. Is it allowed to ask those types of questions?

A You should offer the role to the best candidate for the job, based upon merit, business needs and confirmation that they can meet specific requirements of the job. So in this case you can just ask her for her availability to travel, without specifically referring to the fact that she has recently become a mother. In case she is able to travel and she seems to be the best candidate based upon the other criteria as well, this candidate should get the job.

Where do I get help or guidance?

HR TEAM – SOURCING & PEOPLE DEVELOPMENT

WHAT BEHAVIORS ARE NOT ACCEPTABLE AND HOW CAN WE KEEP THE WORKPLACE RESPECTFUL?

THE CONTEXT

A great working environment is dependent on the way we behave. There are behaviors which are unacceptable at work and contravene with company policies, e.g. policy statement safety, health and environment.

Behavior like (sexual) harassment, bullying/mobbing including discrimination, mental and physical violence are unpleasant and jeopardize physical and mental health, as well as safety.

We consider this as actions, conduct or behavior that any individual or group of individuals is reasonably likely to find offensive, humiliating, intimidating or hostile. It can take many forms, such as verbal (derogatory statements, slurs, epithets, threats, innuendo), visual (cartoons, drawings, postings, e-mail) or physical (assault, physical interference).

This kind of behavior is not tolerated in our work environment. According to national and local regulation, specific procedures apply to deal with it.

These rules and guidelines also apply to internal and external social media and online communication channels. When being part of the online community and communicating through online media, employees have to communicate nonviolent and respectfully with and about each other. We expect our employees to always show a positive, constructive and transparent attitude.

WHAT DOES IT MEAN FOR ME?

Treat others with respect and don't engage in behavior which others may find offensive, intimidating, humiliating or hostile. Also avoid gossips.

If you experience unacceptable behavior, immediately set limits in a respectful but assertive way, even if it concerns a superior. This code of conduct applies to all. If this is not possible or not accepted, please refer to the procedures which are part of the work regulations (informal or formal intervention, depending on the severity and feasibility of solutions). In case you should not have access to it, please refer to the person of confidence and the internal service for prevention and protection at work, the prevention advisor psychosocial risks or the labor doctor, or other relevant parties in your organization (HR, manager, social partners) who might be able to provide information or support.

If other people at the workplace (customers, suppliers, and other) behave in an unacceptable manner, inform management for support. You should also register problems you experience yourself according to the instructions of the work regulations, used for analyses and future prevention. However, it does not replace an internal and/or external intervention/complaint.

If criminal acts occur, make use of the applicable security procedures and systems, inform your management, if applicable the internal security guards, and where appropriate the external emergency

services, according to the instructions/procedures of your business unit. Refer to your manager if they are not known or not available.

You should get all relevant information from the most appropriate source (usually your manager) of your business unit and follow appropriate training. The purpose is to obtain the necessary competences, and to gain sufficient confidence in your function, role and yourself, to cope with these matters.

CAN YOU GIVE ME AN EXAMPLE?

Q I had a personal relation with a team colleague some time ago. Unfortunately, it didn't work out between us and I stopped the relation. Since then the colleague talks negatively about me to other team members when I am not around. Although I told him that this has to stop, he continues. I have the impression that my team behaves different and I feel isolated. What should I do?

A You should raise this with your person of confidence who can informally intervene by advising you how to deal with the situation, to act as mediator or ask for intervention of another party if necessary.

Q I was listening to some of my team members sharing a bad joke about the health problem of one of our team members. What do I do?

A If you feel comfortable to do so, you should raise your concerns with your team members. E.g. "Do you really think that is appropriate to joke in such a negative way? Would you also do this if he/she was here? What if it was about you? Should we not behave as a team also for a team member who is ill?"

If you don't feel comfortable with this then you should raise this with your supervisor or representative person of confidence.

Q Some colleagues are making jokes in a WhatsApp group about a female team member who is still single. Although she is begging them to stop, it just goes on. She told me this in confidence, as she does not want to cause any troubles. What should I do?

A You should tell her that this behavior is unacceptable and does not comply with the internal policies and values. She can raise that to a person of confidence, who can listen and advise in working out an effective solution. If necessary you accompany her to the person of confidence.

Where can I find out more?

WORK REGULATIONS, EMPLOYEE ASSISTANCE PROGRAM

Where do I get help or guidance?

HR TEAM – Safety, Health & Environment
(health.safety@telenetgroup.be)

WHAT DO I NEED TO KNOW TO ENSURE THE SAFETY OF OTHERS AND MYSELF?

THE CONTEXT

All Telenet Group Holding employees (technicians, contact advisors, business administrators, management, etc...) share the responsibility to ensure that our places of work are safe, and our products and services are delivered in a safe way to protect our employees, partners, customers and the communities in which we operate.

WHAT DOES IT MEAN FOR ME?

Follow relevant procedures and instructions and ensure you have completed any training assigned to you.

Ensure the health, safety and wellbeing of yourself and others by taking adequate precautions.

Help others by challenging dangerous behaviors and situations.

Report any health, safety and wellbeing risks and concerns.

Report all work related accidents and incidents.

CAN YOU GIVE ME AN EXAMPLE?

Q What should I do if I see something which I think may be potentially dangerous?

A We all have a responsibility to ensure that we work in a safe environment. You should report anything you consider dangerous to your Health and Safety team so that it can be investigated.

Where can I find out more?

INTERNAL PREVENTION
DOCUMENTATION

Where do I get help or guidance?

HR TEAM – Safety, Health &
Environment
(health.safety@telenetgroup.be)

WHEN SHOULD I NOT TALK ABOUT THE COMPANY?

THE CONTEXT

We keep the public, including our investors, creditors and customers, informed through public release of relevant and clear financial and operational information about our company. Only designated individuals serve as spokespersons for the company, and any communication must comply with our policies on sharing information.

We are prohibited from selectively disclosing material information to securities professionals and investors before such information is disclosed to the general public.

WHAT DOES IT MEAN FOR ME?

You should not talk to anyone inside or outside the company about our results unless the individual has the right to know. If information are disclosed, you must immediately contact your Corporate Communications team.

You should not make any comments on behalf of the company unless you have prior approval. Do not make any disclosure (public or otherwise) about our financial results or prospects without prior consultation with, and approval by, our Investor Relations team.

All press or other media releases and requests for interviews must be coordinated through the Corporate Communications team. The Corporate Communications team must receive prior notification of all country specific releases.

Only approved individuals are permitted to communicate on behalf of the company on social media channels.

CAN YOU GIVE ME AN EXAMPLE?

Q My friend is a journalist and while we were having dinner he asked me how the company is performing. Can I talk to him about this?

A Unless you have prior approval, you should not talk to anyone outside the company about our results or future performance, even informally. You should refer them to the Investor Relations team.

Q I saw commentary on an internet forum about the broadband speeds our company provides. I think some of the commentary is wrong and would like to join the conversation to correct the errors. Can I do this?

A You should not post anything on behalf of the company unless you have been authorized to do so by the Corporate Communications team. If you comment, make it clear these are your personal views.

Q I have been asked to speak at an external event about the work that my team has been leading. Can I do this?

A Before you confirm to speak at an external event you should check with the Corporate Communications team.

Where do I get help or guidance?

INVESTOR RELATIONS TEAM,
CORPORATE COMMUNICATIONS TEAM
(press@telenetgroup.be)

COMPETITION LAWS: WHAT DO I NEED TO KNOW WHEN DEALING WITH A COMPETITOR?

THE CONTEXT

Most countries have laws that are designed to protect free and fair competition. The company is committed to fully comply with applicable competition laws and sector regulations. These laws apply to all individuals within the company and there are significant penalties for breaching the law.

The following issues are typically addressed in the laws of countries in which we do business:

- Agreements that have an anti-competitive purpose or effect, are illegal.
- The communication of commercially sensitive information between competitors is illegal.
- Dominant companies face special restrictions on their commercial behavior to ensure that they do not abuse their lack of competitive constraint.
- Mergers and acquisitions, joint ventures and some financial investments often require prior clearance from a regulator.

In addition to competition rules, the nature of our business means that we are often subject to telecoms or broadcasting sector regulations.

The company has access to commercially sensitive information received from its competitors (e.g. wholesale customers, competing TV distributors, broadcasters and producers). In order to avoid that the company would misuse such information or gain an unfair competitive advantage, telecoms and competition laws require the strict application of Chinese Walls to prevent that commercially sensitive information will be used to determine Telenet's future market behavior.

WHAT DOES IT MEAN FOR ME?

Be vigilant when dealing with competitors, suppliers or customers:

- Do not discuss or agree (formally or informally) current or future prices, product offers, bids or business strategy with competitors and trade associations.
- Take note that many of our suppliers or business customers are also competitors.
- Agreements or understandings (formal or informal) with competitors, suppliers or customers that prevent or restrict competition are usually illegal.
- Beware of limiting resale prices, agreeing to or insisting on exclusivity, agreeing or insisting on non-compete restrictions.
- Avoid talking about bidding intentions with other potential bidders.
- Do not disclose wholesale information to the company's retail departments and only use it for wholesale purposes.

Avoid the appearance of wrongdoing:

- If a competitor approaches you with a proposal you think is not compliant with competition rules, it is not sufficient to stay silent, but you must clearly voice your concern about compliance with competition rules and inform the Legal team of the situation.
- Wherever you are in doubt about compliance with competition rules, consult the Legal team in advance of meetings or discussions.

CAN YOU GIVE ME AN EXAMPLE?

Q My colleague has sent me an email suggesting that we can use our market power to drive a new competitor out of business. The email is a joke and it is clear we would have no such power, but do I need to do anything?

A You should advise your colleague not to write joking or exaggerated emails. Emails are used by competition regulators as a key source of evidence and it would not be easy to demonstrate to a regulator that this email was intended as a joke.

Q While at an industry event, a friend who now works for a competitor, started talking to me about margin pressures in one of our markets and the need for prices to rise. What should I do?

A You must stop the conversation and make clear that you do not think it is appropriate to discuss such topics. You should not listen silently if competitors start to disclose such information.

Q In order to enhance the benefit of network build projects it would make sense for us to agree with our competitor that we will not build in the same areas. Is this allowed?

A No. This kind of geographic division of market focus is not permitted.

Q A colleague from the Marketing department asks me about one of our wholesale partners: how many customers it gained with its latest promotion, and at which level its wholesale rates are set for mobile data. Can I share this information?

A No. This type of information sharing is not allowed due the Chinese Walls requirements.

Q A colleague from the SBS asks me to provide an overview of the distribution fees we pay to other broadcasters. Can I share this information?

A No. This type of information sharing is not allowed due the Chinese Walls requirements.

Where can I find out more?

CHINESE WALLS POLICY,
COMPETITION LAW POLICY

Where do I get help or guidance?

LEGAL TEAM (legal@telenetgroup.be)

WHAT DO I NEED TO KNOW WHEN CHOOSING AND MAINTAINING A SUPPLIER?

THE CONTEXT

Our reputation is an asset and we must ensure that it is protected by working with reputable suppliers.

Our suppliers are expected to agree to our Responsible Procurement and Supply Chain Principles that cover:

- Labour standards
- Ethics
- Health and safety
- Environment
- Sourcing

We work with our suppliers to assess their risk and performance on environmental, social and ethical activities, including human rights.

We are also responsible for ensuring that we treat our suppliers fairly and with integrity.

WHAT DOES IT MEAN FOR ME?

Follow procurement policies and procedures when selecting suppliers.

Disclose any potential conflict of interests, which could influence or be perceived to influence your decisions when selecting suppliers. Potential conflicts with suppliers include:

- A direct or indirect interest (including through family members, friends or others acting on your behalf).
- A close personal relationship.

If you are involved in supplier selection, ensure that you objectively select the supplier that best meets our business needs.

Do not accept gifts or hospitality from suppliers when you are engaged in a selection process.

If you have any concerns whether a supplier acts according to the Responsible Procurement and Supply Chain Principles then you should speak to the Procurement team.

CAN YOU GIVE ME AN EXAMPLE?

Q I manage the procurement team for network equipment. A close friend works on the Telenet account at a vendor that is bidding to become a supplier in this area. Can I be involved in the supplier selection?

A We must ensure that our supplier selection process is objective and impartial. To avoid any actual or perceived impartiality you should complete a Conflict of Interest declaration (contact your Compliance team for guidance on this), and implement any guidance. If you have any doubt whether there is a potential conflict of interest you should disclose this.

Q What do I do if a supplier that I am working with is in the press for abusing human rights?

A You should contact the Procurement team for guidance.

Where can I find out more?

THE SUPPLIER CODE OF CONDUCT

Where do I get help or guidance?

PROCUREMENT
(centerofexcellenceprocurement@telene
tgroup.be)

WHAT DO I NEED TO KNOW ABOUT TRADE LAWS?

THE CONTEXT

We are subject to many trade laws that include things such as sanctions and export controls.

Sanctions prevent us from engaging in commercial relationships with certain individuals, entities and governmental organizations (including persons or entities acting on their behalf).

Export controls include prohibitions and restrictions over the export of goods, technologies and software to specific individuals or countries.

Exports are not limited to traditional shipping methods. An export can be made electronically or through discussions.

WHAT DOES IT MEAN FOR ME?

If you are involved in the export of any items or the transfer of technology internationally, you should ensure that the necessary licenses and approvals are in place before proceeding.

If you are uncertain whether any restrictions or sanctions apply in a situation, you should seek advice from the Legal team.

In addition, we may have certain reporting requirements as a result of payments made to or received from certain countries that are subject to sanctions. If you have any questions about such payments, you should contact the Legal team.

CAN YOU GIVE ME AN EXAMPLE?

Q We are looking to sell surplus set-top boxes to a third-party. The third-party indicates that these will be re-sold throughout the Middle East region. Do I need to do anything further?

A We have a responsibility to ensure that these will not be sold within any country that appears on a sanctions list. You should consult your Legal team before proceeding.

Where do I get help or guidance?

LEGAL TEAM (legal@telenetgroup.be)

WHAT DO I NEED TO KNOW ABOUT ACCURATE FINANCIAL RECORDS?

THE CONTEXT

We are subject to extensive and complex regulations with regards to our financial records and other disclosures about the company's performance. We must ensure that our books and records accurately reflect the company's transactions and are retained for the time required.

All of our books, records, accounts and financial statements must be maintained in reasonable detail, appropriately reflect the company's transactions and conform both to applicable legal requirements and to the Telenet system of internal controls.

Accounting and financial reporting practices must comply with applicable generally accepted accounting principles and other criteria, such as local statutory reporting and tax requirements.

WHAT DOES IT MEAN FOR ME?

Ensure that you obtain the correct approvals and signatories for any transaction.

Record any financial transactions accurately – this includes your expenses.

Ensure that non-financial data, such as customer numbers are reported accurately.

Ensure all documentation is retained for the required length of time and destroyed safely when it is no longer required.

Cooperate with and truthfully represent matters to the internal or external auditors.

Seek guidance from the Finance team if you are unsure and report any matter which you have concerns about.

CAN YOU GIVE ME AN EXAMPLE?

Q As a result of a delay in a project I have unused budget which I would like to spend on a team event. Is this acceptable?

A Expenses budgeted for one purpose should not be used for any other purpose and company money should only be spent where there is a business requirement. Consult your supervisor and Finance if you anticipate any changes to your budgeted spend for any reason.

Q I have exceeded my sales target for this quarter. Can I hold back reporting sales until next quarter to help meet my next quarterly target?

A You must always ensure that all transactions are reported accurately in the period they occurred.

Q I stayed at a hotel on company business but I have lost the receipt of the drink and meal costs I paid at the hotel. Can I still claim this on my expenses?

A You are required to have receipts to reclaim expenses. In this example you should contact the hotel to obtain a copy of the receipt.

Where can I find out more?

TRAVEL POLICY, EXPENSE POLICY,
PROCUREMENT POLICY

Where do I get help or guidance?

FINANCE (TRAVEL), HR TEAM
(EXPENSE), PROCUREMENT

HOW DO I RECOGNISE CORRUPTION AND BRIBERY?

THE CONTEXT

We comply with all applicable anti-corruption laws and conduct our business in a manner that avoids the appearance of impropriety. Allegations of corruption can do serious damage to our business and reputation.

We prohibit improper payments in all our commercial dealings. This prohibition applies to dealings with public officials as well as purely private sector transactions.

We employ strict policies and procedures designed to prevent improper payments, including special procedures for dealing with third parties acting on our behalf in business dealings with public officials.

The company is politically neutral. We do not have political affiliations and we do not participate in the political or electoral process in countries where we operate. Donations to political parties, political party officials and candidates for office are prohibited.

WHAT DOES IT MEAN FOR ME?

Absolute prohibition against improper payments

Never offer, promise, make or authorize a payment or the provision of anything of value in order to obtain any type of business advantage.

Gifts and hospitality

It is prohibited to offer gifts or entertainment to any person or entity if made with the intention of gaining any type of business advantage.

If you are interacting with a public official, you must have an enhanced level of vigilance and awareness.

Indirect payments via third parties

Improper payments are often the result of actions of third parties such as consultants, advisors or entities that have relationships with public officials. If you want to engage third-party intermediaries you should consult the Legal team.

CAN YOU GIVE ME AN EXAMPLE?

Q One of our government customers approached us to make a donation to a charity. Can we do this?

A Your Legal team can advise on charitable donations. Donations must be to legitimate charities and should not be given with the intent of gaining an improper business advantage or influencing a decision.

Q A government official is processing some permit requests for the company and has asked if we could find a role within the company for her niece. Is there an issue?

A All hiring decisions must be based on business need and merit. Finding a role for the official's niece could be perceived as offering something of value to gain a business advantage if due process is not followed.

Q We have been asked to provide our standard package to a government official at no cost. Can we do this?

A No. We can only provide discounts that are broadly available and aligned with the market. We cannot offer additional discounts or free service to any public officials or public organizations.

Where can I find out more?

ANTI-CORRUPTION/BRIBERY POLICY

Where do I get help or guidance?

LEGAL TEAM

WHEN CAN I OFFER AND ACCEPT GIFTS AND HOSPITALITY?

THE CONTEXT

The exchange of gifts and hospitality can build goodwill in business relationships, but can sometimes result in, or give the impression of, improper influence or create a commercial advantage, which is prohibited by anti-corruption and bribery laws.

We want to make sure our employees are never put in a position where their judgment or impartiality is called into question.

WHAT DOES IT MEAN FOR ME?

Before you offer or accept any gift or hospitality you should ensure that you have read and understood the gifts & hospitality policy.

There are some gifts or hospitality that will never be acceptable. Some examples of these include:

- Gifts or hospitality offered or received when in a tender or negotiation process with a third party.
- Cash or gift certificates.
- Any gift or hospitality that creates an obligation or compromise, or could have the appearance of affecting your judgment.

If you do not feel comfortable accepting a gift of any value, please consult your Compliance team (compliance@telenetgroup.be).

CAN YOU GIVE ME AN EXAMPLE?

Q We are currently in negotiation with a prospective supplier and the meeting runs into the evening. The prospective supplier offers to buy dinner for the team. Is this acceptable?

A No. Accepting hospitality during a negotiation phase with a current or potential supplier is not permitted and you should split the cost of dinner.

Q As a thank you for helping a supplier resolve some billing issues, I received a small box of chocolates worth around €10. Can I accept this gift?
A Gifts having a very little or merely symbolic value are acceptable.

Where can I find out more?
GIFTS & HOSPITALITY POLICY

Where do I get help or guidance?
COMPLIANCE TEAM

WHAT IS CONSIDERED INSIDER TRADING AND HOW DO I AVOID IT?

THE CONTEXT

As a publicly traded company, we are subject to laws concerning access to company information and our securities that are traded.

Employees may learn material, non-public information about the company or other companies. Company employees are prohibited from using or disclosing material non-public information about the company.

Information is “material” if there is a significant likelihood that a reasonable investor would consider it important in making a decision to buy, hold or sell securities of the entity or if publication would likely affect the market price of such securities. Examples include:

- Projections of future financial results
- Financial or operational results, especially quarterly and year-end results
- Proposed acquisition or disposition
- Significant events regarding the company’s securities (e.g., dividend or distribution)
- Significant developments or events regarding products, services or strategic plans, including regulatory developments, significant pricing changes, etc.

WHAT DOES IT MEAN FOR ME?

You can buy or sell company securities and other companies’ securities in most instances.

However, if you have knowledge of material, non-public information you are prohibited from transacting in company securities.

Never share inside information with anyone outside the company unless it is necessary for the company’s business activities and proper controls are in place (such as a non-disclosure agreement).

“Tipping” or recommending the company or other securities to anyone, including friends and family, when you might have inside information is not permitted.

Consequences of noncompliance may include criminal prosecution or fines for both our company and the individual involved. Therefore, carefully consult the Telenet Dealing Code before transacting in company securities.

CAN YOU GIVE ME AN EXAMPLE?

Q I work in the finance team and know that one of our key business units will not achieve planned financial targets. Can I sell any stock I have in the company before this information is made public?

A You are prohibited from transacting in company securities either directly or through other persons (such as family members), based upon material nonpublic information that you have about the company’s performance. You should follow the Insider Trading policy (Dealing Code) which gives guidance on when it would be appropriate for you to trade.

Q I work in procurement and I know that one of our vendors is having trouble renewing key contracts. My sister has a lot of money invested in this company. Can I tell her what I know?

A If you have the information because of your role within the company and it is not public information, you should not share that information.

Where can I find out more?

TELENET DEALING CODE

Where do I get help or guidance?

CORPORATE LEGAL TEAM AND/OR
GENERAL COUNSEL
(legal@telenetgroup.be)

WHAT SHOULD I DO IF I FIND MYSELF IN A POTENTIAL CONFLICT OF INTEREST SITUATION?

THE CONTEXT

A conflict of interest situation can exist if your business judgment could be affected as a result of any relationship you have with another person or business entity.

Even the appearance of a conflict of interest can create a perception that you may be acting improperly.

WHAT DOES IT MEAN FOR ME?

Report any possible conflict of interest (or possible appearance) directly to your Compliance team (compliance@telenetgroup.be). You may also report using the web-based reporting system ([click here](#)).

You should make this disclosure as soon as you are aware of the potential or actual conflict.

Remove yourself from any potential conflict of interest situations.

Ensure that you are not involved in hiring or managing a relative or close friend.

Remove yourself from any decision process relating to a supplier or other third party if you have a direct or indirect interest or close personal relationship with them.

You should not take another job or position that could affect your ability to perform your role for the company or that may impact your ability to make decisions in the best interest of the company. Consult the Telenet Code concerning additional external functions if you are considering to accept an external mandate.

CAN YOU GIVE ME AN EXAMPLE?

Q I have been with the company for two years as a manager. In the past month, I have started dating one of my team members. Is this an issue?

A You should disclose this relationship to your line manager so appropriate action can be taken to avoid any potential conflict of interest.

Q My team is recruiting for a role in which my nephew is interested. Can I pass his CV to the recruiting manager?

A You can pass along your nephew's details to the hiring manager, but you must not be involved or influence the hiring process.

Q I am a keen artist and I sell my paintings online. Is this a conflict?

A As long as this does not adversely impact your ability to perform your role within the company, this is permissible.

Where do I get help or guidance?

COMPLIANCE TEAM

(compliance@telenetgroup.be)

