



TelekomSlovenije

**CODE OF
ETHICS
OF THE
TELEKOM
SLOVENIJE
GROUP**



Esteemed readers,

in the Telekom Slovenije Group, we are convinced that success is also based on responsibility, honesty and respect. Each of us contributes to the reputation of the Group, to strengthening relationships and creating a safe and inclusive environment. The Code of Ethics helps us do just that, guiding and connecting us, since it represents our shared commitment to responsible and transparent behaviour – within the Group and outside of it.

We are committed to tolerance, mutual respect and respect for human rights. We operate fairly and in accordance with the law and the values we live by, carefully protecting privacy and data and responsibly developing modern technologies.

Our vision is to create an environment where integrity, accountability and data security guide every decision. We build our reputation together – through ethical conduct, honest attitude towards stakeholders and responsible behaviour every day. We place particular emphasis on sustainable business operations, which are at the heart of our strategic orientations. By managing resources responsibly, protecting the environment and supporting society, we create long-term value for future generations.

Integrity is the foundation of our actions, which is why we prevent corruption, manage conflicts of interest and consistently protect personal data and information security. The trust of all stakeholders is essential for our business operations to be successful.

The Code of Ethics is our shared commitment to behave in accordance with the highest standards of integrity, professionalism and social responsibility.

Together, we are building a future based on integrity, innovation, safety and sustainable business.



Boštjan Košak

President of the Management Board



1. TOWARDS A CODE OF ETHICS

The Telekom Slovenije Group develops the most advanced digital technologies and services that are changing the world. With our knowledge, and through carefully planned development and a clear view to the future, we simplify the lives of our subscribers and users of our services and other clients (jointly hereinafter: Service Users) and ensure them security and reliability at all levels of our operations and services. We believe in simple and secure solutions, and act prudently and responsibly in our everyday work to achieve that end.

Sustainable development and social responsibility are the fundamental strategic guidelines of the Telekom Slovenije Group. We are all responsible for their implementation – from the Management Board and the Directors to each individual employee, within the scope of our competences and responsibilities. We understand sustainable business as an integral part of our business model, which enables us to responsibly manage the impact of ESG (Environmental, Social and Governance) on our operations.

The purpose of the Code of Ethics of the Telekom Slovenije Group (hereinafter: the Code) is to provide unambiguous information and keep the Group's employees abreast of both the basic ethics and legal guidelines that we respect in our work.

Certain areas covered by the Code are defined in more detail in internal acts of the Telekom Slovenije Group and in individual companies in the Telekom Slovenije Group that are complied with full, together with the Code.

Whenever we find ourselves in a dilemma, we should ask the following questions:

- Will my conduct and behaviour have a positive impact on the Telekom Slovenije Group's reputation in the eyes of the public?
- Is my conduct legal?
- Is my conduct in line with internal acts?
- Is my conduct in line with my own personal values and the values and principles of the Telekom Slovenije Group?

The Code applies to all employees and all others who work in some capacity with Telekom Slovenije Group companies, regardless of the legal basis for cooperation, type of job or location of work. The Code uses a single term – employees – for both employees and others who work with the Group.





RESPONSIBILITY TO THE TELEKOM SLOVENIJE GROUP

We are efficient, professional, reliable, responsible and fair in our work, and conduct ourselves in accordance with the principles of a good manager.

2. RESPONSIBILITY TO THE TELEKOM SLOVENIJE GROUP

We perform our work in accordance with the objectives of the Telekom Slovenije Group, and our own personal and professional development. We are efficient, professional, reliable, responsible and fair in our work, and conduct ourselves in accordance with the principles of a good manager. We strive for business excellence every day, at all levels of our operations. Through their conduct, supervisors serve as an example to employees, who they brief on the content of the Code and to whom they offer assistance whenever they are asked.

2.1 We respect the dignity of every individual

Mutual relationships are based on mutual respect and on respect for the dignity of every individual. We reject all forms of bullying, harassment or discrimination on the basis of gender, race, skin colour, age, state of health, religious, political or other conviction, national and social origin, financial status, sexual orientation or other personal circumstances.

2.2 We create a work environment in which open mutual relationships are prevalent

We create a safe, motivational and positive work environment, as we believe that open and honest mutual relationships contribute to business excellence. We encourage the exchange of opinions as a way to find the best solutions to achieve established objectives. To that end, mutual communications are respectful and professional.

We promote innovation, self-initiative, creativity and the search for solutions, while ensuring continuous professional and personal development.

2.3 We are responsible for the assets that serve as the basis for our competitiveness and commercial success

We protect the assets of the Telekom Slovenije Group, and handle them with the care and diligence of a good manager. The value of assets, which include property, plant and equipment, business information and industrial property, serve as the basis for our competitiveness and commercial success.

We handle the assets of the Telekom Slovenije Group that are given to us for use carefully, in accordance with internal rules, as we are aware that we are responsible for them. This includes the protection of trademarks, ideas, research, innovative solutions and other information.

If we identify events or situations that could lead to damage to the assets of the Telekom Slovenije Group, we inform our manager and authorised persons within the Telekom Slovenije Group who are authorised to accept reports of such events and situations, in accordance with the internal acts of individual companies of the Telekom Slovenije Group.

2.4 We carefully protect personal data, information and business data

We handle the personal data of employees, users, business partners and other stakeholders to which we have access on account of the nature of our work with the utmost care, conscientiously and responsibly, and in accordance with the highest level of sensitivity and integrity. We are aware that personal data and the privacy of the individual are basic human rights. We therefore protect such data to prevent access to them by unauthorised persons.

We apply the principle of confidentiality whenever we handle information or business data. We respect rules governing the protection of personal data, trade secrets and information security. We do not disclose confidential or business data, in material or dematerialised form, to third persons or persons not authorised to receive such data. We are aware that the disclosure of business information could cause direct commercial damage to the Telekom Slovenije Group, or cause damage to its reputation or a loss of trust in the Group. Confidential data are protected, regardless of how they are obtained.

All business documentation is retained for legally prescribed periods. To that end, we are responsible for ensuring that business documents are not destroyed, concealed, damaged or made unusable in any other way.

2.5 We separate business life from private life

The employees of the Telekom Slovenije Group are socially active, and participate in various volunteer organisations and social initiatives in their free time. We participate in such activities strictly on our own behalf, and separate our private lives from our business lives.

The property and premises of the Telekom Slovenije Group are not used for personal activities, nor do employees involve Telekom Slovenije Group companies in their private lives.

Political beliefs and opinions, and views about various social topics are expressed strictly on our own behalf.

We express our own opinions and points of view via communication on social networks. Our private posts do not disclose trade secrets, commercial agreements or other information that we have gained knowledge of in the workplace. Our private profiles also maintain a respectful and dignified tone of communication.



RESPONSIBILITY FOR FAIR AND TRANSPARENT OPERATIONS

Fairness and transparency allow us to ensure the long-term success of our operations, as well as to maintain the trust of stakeholders and build the reputation of the Telekom Slovenije Group.

3. RESPONSIBILITY FOR FAIR AND TRANSPARENT OPERATIONS

Our operations are based on ethical principles, and on fairness and transparency. In this way, we ensure the long-term success of our operations, maintain the trust of all stakeholders and build the reputation of the Telekom Slovenije Group.

3.1 We strive for integrity, and for fair and transparent operations in accordance with the law and regulations

Business documents, books of account, and financial and audit reports are maintained in accordance with the highest standards of corporate governance, taking regulations and valid legislation into full account.

We are bound to the full, honest, timely, precise and clear disclosure of business information, which we disclose and also publish in accordance with the applicable regulations and consolidated reporting requirements of the Telekom Slovenije Group.

The communication of data and information regarding our operations, both within and outside the Telekom Slovenije Group, is always truthful, precise, timely and honest. We do not tolerate the concealment from or provision of false data to management or other stakeholders.

We report on the operations of companies whose securities are traded on the regulated market in accordance with stock exchange rules on notification. We are especially careful to follow the principle of the equal notification of shareholders.

We cooperate with the competent supervisory authorities and institutions in supervisory procedures, taking into account regulations governing the protection of confidentiality and the scope of powers and competences of supervisory bodies. We are careful not to work with or assist persons who wish to mislead stakeholders by providing incomplete or misleading information.

The Telekom Slovenije Group advocates professionalism and integrity in relationships with all stakeholders: employees, users, shareholders, owners, investors, analysts, regulatory authorities, the media, competitors, suppliers and other business partners. In mutual relationships, we strive to conduct

ourselves in accordance with the principles of a good and responsible expert, honesty and respect.

We ensure that employees carry out their tasks, authorisations and responsibilities in accordance with valid legislation and the internal acts of a specific company, and with the codes and recommendations that are relevant for our areas of business.

We are aware that compliance means ensuring the highest standards of corporate governance and operations in accordance with international professional standards and best business practices, and with transparent, ethical and socially responsible conduct.

3.2 We avoid conflicts of interest and the pursuit of personal interests

In our work, the interests of the Telekom Slovenije Group always come before our personal and financial interests. We avoid activities and situations in which our personal interests could have a direct or indirect effect on the decisions we make or that could affect in any way the operations of the Telekom Slovenije Group. We also avoid situations where our business decisions may appear to be influenced by direct or indirect personal interests.

Conflicts of interest can affect our business judgement, endanger the reputation of the Telekom Slovenije Group and expose it to risks. Therefore, we must avoid conflicts of interest as much as possible, but if they occur, the effects of conflicts of interest must be minimized and [for example, in the case of a business partner or other person with whom we have a personal investment or participate in the decision on the conclusion of a transaction] inform their manager and the compliance and integrity officer of Telekom Slovenije d.d. or other persons in the Telekom Slovenije Group who are in charge of performing tasks in the field of ensuring compliance and integrity [jointly: compliance officer].

In the Telekom Slovenije Group, internal rules are in place to manage conflicts of interest, which require us to identify and deal with all types of conflicts of interest and prescribe measures and activities to effectively disclose them.

3.3 Gifts and hospitality

We do not permit our work-related and/or business decisions to be affected by gifts, favours and hospitality provided by third persons. Employees may accept from or offer to third persons a gift or hospitality appropriate to the circumstances, provided that the value of the gift or hospitality does not exceed legally prescribed limits and if the acceptance or offering of a gift or hospitality does not raise concerns that such an act could affect the recipient's decisions regarding work-related or business matters [appropriate gift and/or hospitality].

We regularly inform our business partners and all other stakeholders with whom we cooperate in our work about the aforementioned practice.

3.4 Prevention of corrupt practices

Corruption is any violation of the due conduct of officials and responsible persons in the public or private sector, as well as the conduct of persons who are instigators of violations or persons who can benefit from the violation, directly or indirectly promised, offered or given, or requested, accepted or expected benefit for themselves or for others.

The Telekom Slovenije Group does not condone corrupt practices and applies a zero-tolerance policy in that regard. According to the Group's definition, corrupt practices include offering and accepting bribes, and other acts whose aim is to gain or attempt to gain an advantage or benefit for oneself or a third party through the abuse of powers or position. Benefits may be pecuniary or non-pecuniary [services, favours or items]

and whose aim is to influence our business decisions or the business decisions of others.

3.5 We carefully protect inside information

Inside information is any information that indirectly or directly affects the operations of Telekom Slovenije Group companies or the Telekom Slovenije Group as a whole, and the public disclosure of that information could affect the price of securities or other financial instruments. It most frequently takes the form of information regarding financial operations, business activities that could affect the Group's competitive position on the market, the introduction of new services and other activities important to the Telekom Slovenije Group's operations. Any investor (employee, shareholder, supplier, etc.) could use their knowledge of inside information as the basis for an investment decision. Inside information is therefore protected carefully and not disseminated to third persons.

We treat insider information that could affect the price of our securities or other financial instruments lawfully, diligently and fairly.

In our work, we may be briefed on business, inside and other information about Telekom Slovenije Group companies that have not been published. Such information is not exploited for personal financial gain or any other benefit.

3.6 Money laundering and terrorist financing prevention

In accordance with the legally prescribed definition, money laundering is any act aimed at concealing the source of money or other assets obtained via criminal activity, including the conversion or any other transfer of money or other assets deriving from criminal activity, the concealment or disguise of the true nature, source, location, movement, disposition, ownership or rights in connection with money and other assets deriving from criminal activity.

Terrorist financing is the provision or collection or attempt to provide or collect money or other property of legal or illegal origin, directly or indirectly, with the intention or knowledge that it will be used in whole or in part to carry out a terrorist act or other act related to terrorism, or that it will be used by a terrorist or a terrorist or a terrorist organisation.

The Telekom Slovenije Group is committed to the highest standards of prevention of money laundering and terrorist financing. In our work, we act in accordance with the regulations and internal acts governing the fight against money laundering and terrorist financing and do not engage in transactions aimed at money laundering or terrorist financing. We only transact with partners who perform a lawful activity. Through our conduct, we attempt to prevent or identify illegal forms of payment, in particular to prevent the use of the financial transactions of Telekom Slovenije Group companies by third persons for money laundering purposes.

3.7 Compliance with economic sanctions and trade restrictions

Companies in the Telekom Slovenije Group, as international companies, are obliged to strictly comply with all applicable national and international regulations governing economic sanctions and trade restrictions.

Sanctions and trade restrictions are restrictions against specific countries, territories, persons, groups or legal entities for the purpose of maintaining or restoring international peace and security, establishing a commitment to respect for human rights, democracy and legislation. Such sanctions provide legal prohibitions or restrictions on the sale, purchase, transfer or disclosure of assets, services, equipment, information and other goods. Violations of sanctions and trade restrictions can have various consequences, including criminal and civil fines.

All employees, especially those working in the field of procurement, sales, logistics and research and development, must act in such a way that trade restrictions are respected. It is crucial to identify such sanctions and trade restrictions.

In the event of any doubt or before the commencement of business activities that could be subject to these restrictions, it is mandatory to consult the competent department within each company of the Telekom Slovenije Group.

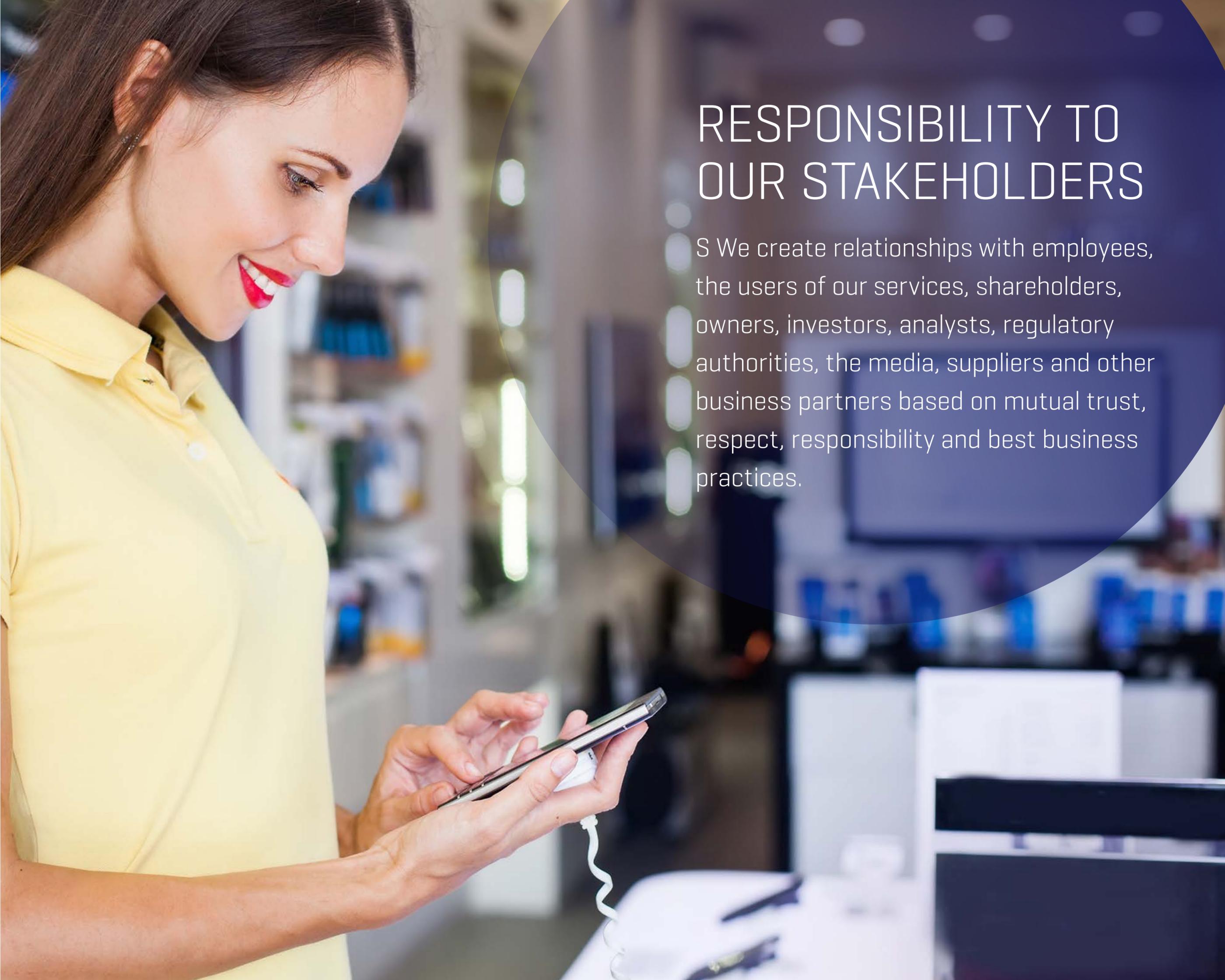
3.8 Prevention of the restriction of competition

We are careful in our communications with competitors to respect valid competition legislation and regulations. We are aware that any collusion or coordinated actions with competitors is unlawful. We therefore reject any agreements with competitors that could lead to restrictive practices, while taking care to closely guard inside information and other confidential business information in communications with them.

We conduct ourselves fairly and prudently on the market where we operate, and do not abuse our market position through our conduct. We take into account all aspects that could affect competition in every decision or activity relating to our operations on the market. In our daily business activities and in the performance of our work, we are obliged to comply with the rules of competition law and sectoral regulations in the field of electronic communications at all times and everywhere, and to refrain from prohibited types of activities on the market that could restrict or distort competition.

3.9 Reporting dishonest conduct

If we learn of any unlawful act, event or unethical conduct that could harm the reputation or operations of the Telekom Slovenije Group, or that breaches the dignity and personal integrity of an individual employee, we are bound to report such an event without delay.



RESPONSIBILITY TO OUR STAKEHOLDERS

S We create relationships with employees, the users of our services, shareholders, owners, investors, analysts, regulatory authorities, the media, suppliers and other business partners based on mutual trust, respect, responsibility and best business practices.

4. RESPONSIBILITY TOWARD OUR STAKEHOLDERS

We create relationships with employees, the users of our services, shareholders, owners, investors, analysts, regulatory authorities, the media, suppliers and other business partners based on mutual trust, respect, responsibility and best business practices.

4.1 Responsibility to employees

In the Telekom Slovenije Group, we operate fairly and follow the highest ethical standards. We are aware that committed, professional and motivated employees are essential to the performance of the Telekom Slovenije Group. We therefore create conditions for the well-being of all employees in the workplace, while dedicating special attention to personal and professional development. We carry out activities aimed at the right work-life balance, and thus increase employee satisfaction and reduce stress in the workplace.

We strive to ensure that Telekom Slovenije Group employees are briefed on strategic policies and key business decisions in a timely manner.

The Telekom Slovenije Group respects the dignity and personal integrity of its employees, and consequently any discrimination, unequal or unfair treatment of employees is not allowed. We also strongly condemn any form of violence, bullying, harassment or harassment of employees.

In the Telekom Slovenije Group, we treat all candidates in recruitment procedures fairly. The selection of the candidate is made on the basis of objectively assessed knowledge, experience and competencies. We provide equal opportunities to candidates as well as employees, regardless of personal grounds such as race, gender, religious belief, age, skin color, sexual orientation.

We respect employees' right to join workers' organisations (at both the company and sectoral level), and strive to ensure that dialogue with social partners is professional and in line with the regulatory framework.

4.2 Responsibility to the users of our services

Users are the focal point of our operations. We therefore

build long-term relationships that are based on trust and satisfaction. We develop the most advanced services in line with trends in the sector with the aim of simplifying users' lives, while at the same ensuring security and reliability. Among the most important elements of the Telekom Slovenije Group's operations are the quality, simplicity, clarity and accessibility of our services.

We approach users of our services with integrity, respect and responsibility, regardless of their background, needs or circumstances. We are committed to protecting their privacy, ensuring data security, and communicating in a clear, transparent, respectful, and fair manner. Our goal is to build long-term, trustworthy relationships based on quality services and sustainable value to the individual and society.

In some situations, our competitors, government authorities and business partners are also our users of our services. In these cases, we act professionally, in the same way as in relation to any user of our services.

We process and use the data of our service users fairly, transparently and in accordance with internal acts and applicable regulations. In accordance with internal rules, regulations and standards, we also protect the confidentiality of information about users of our services and take various measures to prevent their possible misuse.

In the Telekom Slovenije Group, we have procedures for resolving complaints from users of our services, which are dealt with fairly and within deadlines.

4.3 Responsibility to shareholders

Shareholders represent the group with a decisive impact on the strategic decisions and operations of the Telekom Slovenije Group. The generation of value for shareholders is thus the most important objective of the Group's corporate governance.

The Telekom Slovenije Group maintains a corporate governance system that respects the principle of the equal treatment of shareholders and that facilitates the responsible exercising of their rights. In this framework, shareholders are regularly informed about significant events and issues associated with the achievement of established objectives, the Group's performance and planned operating results.

4.4 Responsibility to business partners

In our operations, we primarily work with those partners who can help us ensure continuous development and the provision of superior services. Relationships with business partners are built taking into account ethical and legal norms, including tolerance, mutual respect and a transparent and non-discriminatory relationship.

We will explain to our business partners that we are bound to this Code, and at the same time we expect the same standard of respect for human rights and dignity, diversity and ethical and sustainable business, which is in accordance with the rules of the Telekom Slovenia Group regarding the conduct of suppliers.

We expect our business partners to share our commitment to the highest ethical and sustainable standards.

When working with business partners, we strive to clearly allocate roles and responsibilities. Proper operation and cooperation of all stakeholders is also important in ensuring information security and compliance of Telekom Slovenije Group services with applicable regulations in this field, which is why we require business partners to implement appropriate measures.

4.5 Responsibility to regulatory and other competent authorities

We work with representatives of regulatory authorities,

legislators and other official institutions in accordance with the applicable regulations and laws.

We respond to requests from state authorities for access to information about users of services or communications exclusively in accordance with applicable regulations, paying particular attention to procedural rules.

4.6 Responsibility to the general public

The Telekom Slovenije Group is constantly under the watchful eye of the general public. Representatives of various stakeholder groups want to know how we face challenges in the adverse economic environment, what are our business plans and strategy, how are new products developed and the network upgraded, what can they expect in the future in terms of technological development and growth in the value of the Company, etc.

The media plays a special role in communicating our messages to stakeholders. We are therefore open to the media, work closely with representatives of the media and provide them access to the information they need to do their job (while protecting trade secrets, inside information, confidential information, and personal and other sensitive data), respond to their questions and maintain a proper and professional relationship.

4.7 Responsibility to the wider social community

The Group actively identifies opportunities where it can contribute to the development of the social and economic environment in which it operates, through its expertise, and financial and other resources.

In our work, we are committed to the principles of sustainable development, and we plan to reduce our impact on the environment and on our habitat.

Social responsibility is one of the key strategic orientations of the Telekom Slovenije Group, and the activities in the field of sponsorship and donations reflect our vision, mission and values. We support sporting, cultural, educational, humanitarian and environmental organisations and projects, and take a responsible approach to nature and cultural

heritage. Sponsorships and donations are shared publicly and transparently, based on the consideration of long-term positive effects for the Company.

As an active member of the society, we are charitable, help those in need, respond to exceptional circumstances and support sports, cultural activities as well as educational and other activities.

Companies in the Telekom Slovenije Group do not support political parties and their election campaigns, nor referendum campaigns or election campaigns of individuals with their financial resources or in any other way.

4.8 Responsibility for natural and cultural heritage

We are committed to protecting, preserving and promoting the natural and cultural heritage – movable, immovable and intangible – managed or owned by the Telekom Slovenije Group. We consider heritage as an important part of the Group's identity, a source of innovation, creativity and social responsibility, and a foundation for economic, social and local development.

When managing heritage, we follow the principles of ethical conduct, professionalism, compliance with legislation, industry standards and international guidelines (such as UNESCO and ICOM). We are committed to ensuring that the heritage is accessible to employees and the public and preserved for future generations.

Special attention is paid to the promotion of heritage, support for projects and programmes that strengthen its importance at the national and international level, and care for a sustainable future. We are aware that responsible management of heritage is a common task of all employees in the Telekom Slovenije Group.

4.9 Respect for human rights

We respect and protect human rights and fundamental freedoms that are recognised nationally and internationally, including adherence to the United Nations Guiding Principles on Business and Human Rights. We strive for tolerance and

mutual respect.

In all work processes, we respect and enable equal treatment regardless of sex, race, skin colour, age, health condition, disability, religion or belief, national and social background, sexual orientation, family situation, membership in a syndicate, financial situation and other personal circumstances.

The Telekom Slovenije Group strictly prohibits and has zero tolerance for all forms of child labour, in its own operation as well as throughout the supply chain. We are committed to respecting the right of every child to childhood, education, safety and health. When developing and offering our services and products, we pay special attention to the safety of children in the digital environment, encourage the responsible use of technology and actively cooperate with educational institutions and non-governmental organizations in raising awareness about online safety.

The Telekom Slovenije Group respects fundamental human rights, such as the right to work, dignity in the workplace, fair pay, opportunities for education and career development, work-life balance and social security. We also strive to provide a healthy and safe working and living environment for all our employees.

As a responsible employer, we undertake to provide all available support to employees who are victims of domestic violence in accordance with the applicable regulations and internal acts.

In order to raise awareness and educate about the importance of respecting human rights and to prevent misconduct, we carry out various preventive measures and activities, which include trainings and workshops for employees on ethical conduct, non-discrimination and the prevention of all forms of harassment. We have clearly defined internal acts and procedures that set standards of behavior and sanctions for human rights violations and clearly established mechanisms for reporting and dealing with unwanted conduct that ensure the confidentiality and protection of reporting persons, and we provide advice and support to employees in cases where their rights are threatened.

We have appointed a Human Rights Administrator to monitor the respect for human rights, as well as the effective implementation of commitments in this field.



SUSTAINABLE BUSINESS

With our main activity – providing modern infrastructure, services and the most advanced solutions – we actively support the digital development of Slovenia and the wider region. In doing so, we focus on creating a society that is friendly to people and the environment and reduces the digital divide between rural and urban areas.

OSTVARJAMO
PRIHODNOST

NEO

IMAM NED Z
NAJBOLJŠIMI
LIGAMI.

VSI PAKETI NED
28€*
ZAKLETO

Premier League

Telekom Slovenija

5. SUSTAINABLE BUSINESS

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5.1 Ethical framework of sustainable business operation

Sustainable business is a fundamental ethical principle of the Telekom Slovenije Group. We are committed to acting responsibly towards the environment, society and future generations. In all decisions, we seek the right balance between business performance, environmental protection and social responsibility. Our operations are based on respect for human dignity, digital rights and the inclusion of vulnerable groups such as children, the elderly and people with disabilities.

We are committed to the ethical use of technology, transparent data processing, and the creation of inclusive digital solutions that exclude no one. We build our services responsibly – with the safety, availability and long-term trust of users of the services in mind.

We actively co-create a better society by supporting initiatives and activities that contribute to improving the quality of life, social inclusion, health security, access to knowledge and the development of sport and culture in the local and wider environment. We also encourage our employees to engage in such activities.

5.2 Smart infrastructure and sustainable development

With our quality network and technological solutions, we are reducing the digital divide in Slovenia, Kosovo and the entire region, thus reducing the disparities between rural and urban areas and creating equal opportunities for the development of business, education and health and social services.

We are committed to sustainable development in the environment in which we work and live. Our smart infrastructure solutions actively contribute to climate change mitigation. We take care of

reducing the negative impact of our activity on the environment, which includes reducing greenhouse gas emissions, rational use of energy and resources, selection of low-carbon energy sources, principles of the circular economy, waste separation and saving natural resources, and we are especially responsible in the management of e-waste. The environmental management system is constantly being improved and modern, economical technologies are being introduced.

5.3 Circular economy and responsible use of resources

The circular economy is the foundation of our resource management. We encourage reuse, recycling and extending the life of products. After the end of its service life, electronic equipment is handed over for processing to authorised partners. We participate in projects that reduce the amount of waste in landfills and take care of responsible e-waste management.

5.4 Concreteness of objectives and measures

We are committed to achieving measurable sustainability goals that include:

- Reduction of greenhouse gas emissions and carbon footprint,
- Increasing the share of low-carbon and renewable energy sources,
- A rational use of energy, water and other resources,
- Regular monitoring and reporting of environmental indicators,
- Compliance with the guidelines of the European Sustainability Reporting Standards, the Corporate Sustainability Reporting Directive and the 2030 Agenda with SDG targets.

Our sustainable business policies include continuous process improvement, innovation and responsible resource management.

5.5 Digital ethics

In the world of digital services, data power and artificial intelligence, we are focusing on creating simpler solutions for users of our services. Our approach to AI is thoughtful, focused on positive impact, and aligned with the United Nations Sustainable Development Goals.

We make sure that security and data protection are built into the core of each of our products and services. In doing so, we are particularly committed to the ethical development of AI, which is based on the principles of transparency, fairness and human oversight.

We actively promote the responsible and moderate use of digital services and devices, raising awareness among users, employees and the general public about the importance of digital moderation, security, privacy protection and a balanced digital life.

5.6 Regular monitoring, reporting and improvement

We regularly monitor and analyse the impacts, risks and opportunities in the field of environment, society and management and include them in the business model and annual reports. We are constantly adapting our policies and measures to new challenges, legislation and stakeholder expectations.



RESPONSIBILITY TO THE CODE

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6. RESPONSIBILITY TO THE CODE

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The Telekom Slovenije Group also expects other persons (natural or legal) acting in the name and on behalf of the companies in the Telekom Slovenije Group, as well as in the name and on behalf of the Telekom Slovenije Group, to comply with the general principles and standards of the Code.

Every employee is responsible for being familiar with the content of and complying with the Code of Ethics in their work.

Employees are responsible for knowing the content of the Code and performing our work and tasks in accordance with its provisions. We are aware that failure to comply with the Code may be deemed a breach of work obligations, and could result in disciplinary action, liability for damages, criminal liability or other liability.

The Code serves as guidelines in the drafting of the Telekom Slovenije Group's internal acts. The Compliance and Integrity Officer of Telekom Slovenije is responsible for interpreting them.

We are obliged to report any potential or identified violation of the Code and other internal rules, or any illegal, unethical or otherwise questionable conduct, in one of the following ways:

- directly to their supervisor,
- via the intranet portal,
- via the email address for that specific purpose zvizgastvo@telekom.si,
- via ordinary post,
- directly to the compliance and integrity officer skladnost@telekom.si.

Employees of other companies of the Telekom Slovenije Group are obliged to report any potential or identified violation of the Code and other internal rules, or any illegal, unethical or otherwise questionable conduct, to the addresses established by individual companies of the Telekom Slovenije Group for this purpose.

All reports will be handled in accordance with internal acts of Telekom Slovenije d.d. by the Whistleblowing Committee. In other companies of the Telekom Slovenije Group, the competent authorised persons.

Individuals who are aware of breaches are obliged to:

- act in the best interests of the Telekom Slovenije Group company in question and in accordance with their powers,
- protect the integrity and identity of both the whistleblower and the individual or group to which the report relates, and
- protect the whistleblower against potential retaliatory or other acts.

The Code does not provide answers to all specific questions. Employees must be familiar with the content of internal acts that govern a specific area, legislation and regulations that impact our operations, and measures imposed by the regulatory authority that we must respect as an operator with significant market power.

Telekom Slovenije, d.d. is expected to conduct a survey on business integrity and compliance every two years, which also includes the content of the Code of Ethics. The survey shall also be carried out in other companies of the Telekom Slovenije Group in a meaningful content and period.

Companies in the Telekom Slovenije Group shall be obliged to adopt and comply with the Code of Ethics, as well as all its updates.

The Code of Ethics of the Telekom Slovenije Group shall be reviewed and, if necessary, updated at least every two years.

The Code of Ethics of the Telekom Slovenije Group shall apply as of its publication on internal websites of Telekom Slovenije and shall apply as of 1 January 2026. The Code of Ethics of the Telekom Slovenije, d.d. Group of 31 January 2017.



Code of Ethics of the Telekom Slovenije Group

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