



Takes effect on June 1, 2023

Business Conduct Code for Companies of TET Group

Rīga





COMPANY VALUES, MISSION, AND VISION	HUMAN RIGHTS	INCLUSIVE, DIVERSITY-OPEN, NON-DISCRIMINATORY WORK ENVIRONMENT	SUSTAINABILITY	PREVENTION OF BRIBERY AND CORRUPTION	PREVENTION OF CONFLICT OF INTEREST	FAIR COMPETITION	INFORMATION PROTECTION
PERSONAL DATA PROTECTION	INTELLECTUAL PROPERTY PROTECTION	RESPONSIBLE TAX PRACTICES	PREVENTION OF MONEY LAUNDERING AND FINANCING OF TERRORISM	RELATIONS WITH STAKEHOLDERS	RESPONSIBILITY OF MANAGERS TO INTERNALIZE PRINCIPLES OF CONDUCT	EMPLOYEE RESPONSIBILITY TO ADHERE TO PRINCIPLES OF CONDUCT	REPORTING OF POSSIBLE WRONGDOINGS



Company values, mission, and vision

Our values define our identity, and in making strategic and daily business decisions, we strive to fulfill our mission and vision. Tet subsidiaries adhere to Tet's mission, vision, and values, and in addition to those, they can establish specific values for their company's business direction with shareholder approval.

Our vision is to be a world-class technology partner for life and work. Our mission is to open up the world of technology and make it understandable and accessible to everyone.

A Tet employee is a world-class technology expert who listens and is capable of solving the most complex issues and explaining them in a understandable manner. In order to become such an employee, Tet values serve as a reminder of the attitude and approach to performing both big and small tasks:

- Courage to try
- Persistence to improve
- Openness to understand



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Human rights

In our operations, we ensure the respect and protection of universally recognized human rights, guided by principles described in significant human rights conventions such as the UN Universal Declaration of Human Rights, the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights.



We have identified human rights that we interact with most closely in business processes, such as equality, the inviolability of private life and correspondence, the right to freedom of belief, and the right to freely express opinions, as well as all human rights implicated in employment relationships.



Through our company mission, we strengthen human rights because the accessibility of technology, particularly the Internet, enhances people's ability to exercise their human rights and gain valuable experiences in areas such as education, healthcare, professional development, economic activity, civic engagement, and others.



We take into account the dimension of human rights when selecting our partners in accordance with the "Tet Group Supplier Code of Conduct".



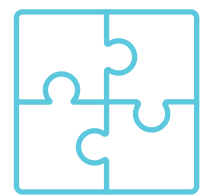
Employees have the right to freely and without any direct or indirect discrimination join the Latvian Telecom Employees' Trade Union PRO (LSAB PRO) or any other organization to defend their social, economic, and professional rights and interests and utilize the opportunities provided by these organizations.



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Inclusive, diversity-open, non-discriminatory work environment

We value diversity in the workplace as it forms the foundation for creating solutions and fostering innovation aligned with the needs of our clients and employees.



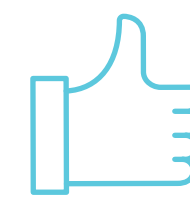
We provide equal opportunities to our employees regardless of gender, race, skin color, age, disability, religious or political beliefs, national or social origin, property or family status, sexual orientation, or other grounds.



We hire, promote, determine compensation, or terminate employment based solely on the employee's professional qualifications and compliance with external and internal regulatory requirements.



At Tet, we expect our employees to demonstrate a responsive, polite, and courteous style of collaboration and respectful interaction, where colleagues are encouraged to openly express their opinions and be heard. It is important to us that every employee feels free to express their views and feel comfortable in the workplace, thus creating the conditions for their best professional performance. Therefore, offensive behavior among colleagues, such as offensive comments or jokes, bullying, sexual harassment, gossiping, or social isolation, is not tolerated.



Workplace conflicts are addressed openly and constructively. The primary channel for resolving conflict situations is for the employee to approach their supervisor or the specialists in the People and Environment department. To report possible wrongdoing, employees have access to a Whistleblower channel (see the section Reporting Wrongdoing in this document).



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In Tet's operations, non-financial performance is as important as financial indicators. Our sustainability ambition is to realize our company's vision in a manner that involves responsible consumption of natural resources and the development of new technologies for more resource-efficient consumption. Additionally, we strive to make technology accessible to a wide range of individuals and businesses while promoting the development of skills in society necessary for using technology to foster both individual and collective progress.

Climate and circular economy, digital inclusion, and digital security are our main areas of impact on which we focus our investments to drive positive change. Meanwhile, our sustainability program encompasses a broader range of environmental, social, and governance topics that are essential for both the company and society. Further information on this topic can be found in the document "Sustainability Policy."



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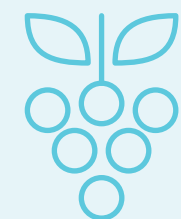
Prevention of bribery and corruption



Tet has a zero-tolerance policy towards corruption. This means that no employee may offer or promise undue advantages to a person in a position of responsibility or induce another person to do so. Similarly, Tet employees do not accept gifts, services, or any form of favor that could lead the giver to expect any benefits in return. Tet takes all necessary and appropriate actions to limit the exchange of business gifts within the scope of business collaboration.



Acceptable and business-practice-compliant gifts include company souvenirs (such as promotional items) or gifts intended for shared use by office employees (such as books, fruits, etc.). The employer ensures regular employee education on behavior consistent with the Code of Conduct in situations involving the giving or receiving of gifts.



Hospitality events (corporate events, social gatherings, official breakfasts/lunches/dinners, seminars, informative events involving a wide range of invited participants, or entertainment events) can be organized and/or attended if the specific purpose of the event is known, no decisions or actions that would otherwise not be accepted or implemented are expected, and the costs of the event are reasonable and justified.



Tet covers the expenses of employee business trips and business travel, except in cases where such expenses are fully or partially covered by relevant legislation or international agreements of the European Union or other international organizations. Tet employees, with prior coordination with the People and Environment Department, are allowed to participate in business trips and travel for events where the costs are covered by the event organizer, provided that the event meets the following criteria: 1) the event is public, and 2) the event is not related to contract negotiations or subsequent cooperation discussions.



If an employee has doubts about the of a received gift's compliance with acceptable business practices, the employee should consult their immediate supervisor or the People and Environment Department. In any case, the employee should never accept gifts that could create expectations of receiving benefits from the company for the giver. When deciding whether to give or accept a gift, the employee always considers whether it could harm the company's reputation.

Employees have a reporting channel to raise an alarm if they are pressured to offer a bribe or suspect that another employee is involved in accepting bribes.



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Prevention of conflicts of interest

A conflict of interest arises when an employee, in the performance of their duties, must make a decision or participate in decision-making or carry out other job-related activities that may affect or potentially influence the personal or material interests of the employee, their relatives, or business partners.

Tet expects employees to avoid conflicts of interest while performing their job duties. Therefore, it is the employee's obligation to refrain from decision-making situations where they may encounter a conflict of interest, and to inform their supervisor accordingly.

The employee must use their position and the information acquired during their employment solely for the benefit of the company, rather than acting in accordance with personal interests. It is not desirable for relatives to work directly under the same chain of command within the company.

Any additional employment with another employer or involvement in other companies is permissible as long as it does not create a conflict of interest and does not interfere with the fulfillment of the duties specified in the job description within the company. In all cases of employment relationships with another employer, approval must be obtained from the direct supervisor. In other cases (service contracts, author agreements, etc.), if there is a possibility that the planned activities may create a conflict of interest (such as working for a direct competitor of the company, Tet's business partner, or government and municipal institutions), such engagement or involvement in such companies must be coordinated with the direct supervisor.

To facilitate the management of conflicts of interest within the Tet Group of companies, employee groups whose job responsibilities are related to areas where there is an increased likelihood of encountering situations of conflicts of interest are required to submit a declaration of economic interests. Detailed guidelines can be found in the document "Internal Rules of Operation."



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Fair competition



We ensure free, fair, and equal competition in the field of services we provide. We do not discuss prices, customers, or any other competition-sensitive information with competitors. We do not engage in activities aimed at limiting or hindering effective and fair competition, fair and equal business conditions, or that could result in such restrictions.



We require transparency in the work of industry associations.



We ensure fair and transparent practices in procurement processes.



Our employees, in the performance of their duties, comply with the requirements of legislation, including specific legal norms that regulate the provision and content of specific services, as well as advertising, consumer rights protection, commercial practices, personal data protection, prevention of money laundering, and ensuring compliance with Latvian and European Union sanctions and competition laws.



Employees, in the performance of their duties, act objectively and fairly, with their behavior and actions fostering public trust in Tet as a service provider and seller of goods. Employees do not take advantage of customers' lack of knowledge about the functionality and terms of service provision. Employees ensure that customers are provided with all the necessary information to make decisions regarding the conclusion of a service agreement with Tet. Employees do not engage in activities that could be considered commercial bribery.



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Information protection



Information that can be used by other individuals for their economic activities or other interests is considered confidential. Tet protects its own and Tet entrusted trade secrets - information that corresponds to the characteristics defined in the Commercial Secrets Protection Law, as well as other information that has the status of undisclosed information according to legislation or agreements.



Employees are responsible for handling company information. The dissemination of confidential information and personal data of individuals is not allowed. The circulation of information within the company is determined by the document "Tet Group Information Resource Classification, Circulation, and Protection Procedure."



Employees are aware that Tet does not obtain another company's confidential information through unlawful and unethical means.



The circulation of confidential information is also restricted within the company, and it is only shared with employees who require it for the performance of their job duties.



Discussing commercially sensitive information with clients, relatives, and acquaintances is not permitted. Care must also be taken to prevent accidental disclosure of information, such as in remote work situations or when working with information under inadequate digital security conditions.



It is not permissible to disclose confidential information even after the termination of employment relationships.



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Personal data protection

Tet places high importance on the protection of data and responsibly and diligently complies with the requirements of EU regulations and local laws. Tet's attitude towards the security of employee and customer data has always been and will continue to be consistently responsible, as evidenced by Tet's continuous efforts to enhance and improve its level of service security.

The processing of personal data by Tet is described in documents such as the "Privacy Policy," "Employee Privacy Policy," "Privacy Policy for Employee Recruitment Process," and other related regulations, which are available in the "General Data Protection Regulation" section of the intranet.



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Intellectual property protection

Tet respects the intellectual property of third parties and takes measures to protect intellectual property rights.

Intellectual property created as a result of performing work duties is considered Tet's property.



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Responsible tax practices

We acknowledge that we are a significant national company and employer, and our tax payments contribute to the country's economic and social well-being.



Tet handles tax matters with responsibility, ethics, and transparency.



Tet does not engage in aggressive tax planning aimed solely at reducing tax expenses.



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Prevention of money laundering and financing of terrorism

Tet manages the risks related to international and national sanctions, as well as activities aimed at preventing money laundering and the financing of terrorism, in its business relationships.

The procedures for preventing these risks are defined in the document "Tet Group's Internal Control System for the Management of International and National Sanctions Risk, Prevention of Money Laundering, Terrorism, and Proliferation Financing (Sanctions Procedure)."



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Relations with stakeholders



Our goal is to ensure long-term value for the owners of our company's shares (shareholders) by responsibly managing the company, ensuring profitability and cost efficiency. We ensure transparency the company's management and operations to provide shareholders with complete, accurate, objective, up-to-date, and truthful information about the company's business activities, results, and other commercial matters.



With our clients, we establish fair business relationships in accordance with widely accepted business principles. In our communication with clients, we are respectful, responsive, open, pragmatic, and constructive.



When dealing with state officials, civil servants, state and local government institutions, and joint-stock companies, we pay special attention to ensuring that employees do not exceed their mandate, strictly comply with regulatory acts, and do not create situations of corruption and conflicts of interest, especially regarding the giving and receiving of gifts.



We are committed to cooperation and provide timely, truthful, and complete information to supervisory authorities. We consult and collaborate with government agencies in a timely manner to find the best legal solutions for our business operations and clients.



We believe that it is important for the company to be an active and responsible member of society, which is why we engage in societal agenda, participate in the work of NGOs and support various social initiatives. The principles of support and the rules for providing support are described in the document "Tet Group's Support and Donation Policy," while the participation in non-governmental organizations is governed by the "Procedure for Tet Group Companies' Participation in Non-Governmental Organizations."



With our suppliers, we adhere to the principles of ethical business cooperation and encourage them to follow similar standards to those we uphold. Employees who are responsible for procurement and engaging in contract negotiations with suppliers are required to familiarize suppliers with the guidelines outlined in the document "Tet Group Supplier Code of Conduct" and ensure that suppliers commit to adhering to these guidelines.



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Responsibility of managers to internalize principles of conduct



It is the responsibility of Tet company managers and Tet subsidiary company managers to inform all employees about the principles of the Code of Conduct and support them in adhering to good business practices.



Managers must not encourage employees to act in contradiction to the principles of the company's Code of Conduct for the sake of commercial gain.



Tet management is committed to supporting and protecting employees who report possible violations.



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Employee responsibility to adhere to principles of conduct



Compliance with the principles of the Code of Conduct in achieving the company's objectives is no less important than an employee's professional abilities, job performance, and adhering to prescribed actions. Therefore, when evaluating an employee's performance, adherence to the Code of Conduct is also assessed.



For violations of the Code of Conduct, disciplinary measures such as a warning or reprimand may be applied to the employee. The provisions of the Code of Conduct are taken into account by the employer when entering into an employment contract in accordance with Article 101, Paragraph 1, Point 3 of the Labour Law: evaluating whether the employee's conduct can be deemed contrary to good morals as understood in Article 101, Paragraph 1, Point 3 of the Labour Law. In the case of significant violations of the Code of Conduct, the employer has the right to terminate the employment contract with the employee in accordance with Article 101, Paragraph 1, Points 1, 2, or 3 of the Labour Law.



A significant violation of the Code of Conduct may be considered as:



Failure to submit a declaration of economic interests, providing false information in the declaration of economic interests, or failure to update the information in the declaration.



Breach of the legal interests of whistleblowers (including disclosure of confidential information, applying unfavorable consequences related to the submission of a whistleblower report).



Breach of the legal interests of a whistleblower may also entail administrative liability in accordance with legislation.



Intentional submission of a false whistleblower report may result in administrative liability in accordance with legislation.



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Reporting of possible wrongdoings

Tet provides employees and business partners with the opportunity to report any possible wrongdoing or violation of regulatory acts, ensuring the guarantees of protection provided in the Whistleblower Protection Law. Further information regarding the procedure for reporting wrongdoing and the content of the report is included in the appendices of this Code of Conduct.

Reporting on possible wrongdoings and whistleblowing

1. Tet Group companies provide employees and business partners with the opportunity to report any possible misconduct or violation of regulations:

- that they become aware of while performing their duties or establishing legal relationships related to the performance of their duties, and
- that may harm public interests (hereinafter referred to as a whistleblower report).

2. Whistleblowers report possible violations conscientiously, responsibly evaluating the truthfulness and reliability of the information provided.

3. Intentionally providing false information, disclosing information containing state secrets or trade secrets, and reporting for private gain or personal interest infringement shall not be considered whistleblowing.

4. Tet Group companies provide guarantees of protection for the whistleblower, their relatives, as well as the person mentioned in the report, in accordance with the law, including:

- protection of the whistleblower's identity by pseudonymizing their personal data and ensuring appropriate protection of the whistleblower's personal data - the whistleblower's personal data may only be disclosed to persons (institutions) who need it for the examination of the whistleblower's report or the initiation of proceedings or for the protection of the whistleblower or their relatives;
- limited accessibility status is applied to the whistleblower's personal data, the report, attached written or material evidence, as well as materials for the review of the report;
- protection against adverse consequences (disciplinary sanctions, worsening of employment contract terms) caused by whistleblowing - no adverse consequences (repressions) are imposed on whistleblowers who act in accordance with the provisions of the laws;
- if adverse consequences are nevertheless caused by the employer due to whistleblowing, the person has the right to protection (including state guarantees) in accordance with the laws;
- refrain from disclosing information that reveals the identity of the natural or legal person who reported the whistleblowing. Such information may only be provided to the person or institution that needs it for the examination of the whistleblower's report or the initiation of proceedings based on it or for the protection of the whistleblower or their relatives.

5. Employees of Tet Group companies can submit whistleblowing reports as well as other complaints regarding possible violations of regulations in writing - in a paper document or by email, at their discretion, to one of the following recipients:

- Tet Legal Department Director,
- Tet People and Environment Department Director,
- Tet Internal Audit Department Director in person or by email: parkapumu_riski@tet.lv,
- their immediate supervisor or the manager of the Tet Group company.

The person who receives the report or submission informs the Director of the Tet Internal Audit Department.

6. Whistleblower reports and other submissions regarding possible violations of regulations by Tet Group company business partners can be submitted in writing - in paper document form or by email, at their discretion, by sending them to the email address: parkapumu_riski@tet.lv.

7. It is advisable to use the form (see attachment of Code of Conduct in Latvian language) when submitting a whistleblower report.

Reporting on possible wrongdoings and whistleblowing

8. If the form is not used, the report should indicate that it is a whistleblower report in order to ensure the legal protection of the whistleblower's interests. If a submission is made without indicating that it is a whistleblower report, while the submission has not yet been examined in substance, the employee may request that the submission be treated as a whistleblower report, and in such case, it will be examined in accordance with the provisions for whistleblower reports.

9. Whistleblower reports cannot be submitted anonymously, as it would not be possible to ensure legal protection of the whistleblower's interests, and the person cannot be provided with information about the progress of the report.

10. Whistleblower reports are registered and stored securely in the Tet Group company's report database. The reports are reviewed, evaluated, and followed up by the Director of the Tet Internal Audit Department, who informs the Executive Board of Tet Group companies about the reports received and the progress of their examination. The Executive Board decides on further action to be taken, if necessary.

11. The person mentioned in the whistleblower report is informed about the receipt of the report and its examination, if it does not hinder the examination of the report or contradict the interests of the whistleblower's protection or the protection of the person mentioned in the report.

12. The person who receives the report and the persons involved in the examination of the report (including the persons mentioned in the report) must keep confidential all information obtained in connection with the examination of the whistleblower report and not disclose it to persons not involved in the examination of the report, unless otherwise provided by law.

13. The person mentioned in the report has the right to present objections to the received report in writing to the Director of the Tet Internal Audit Department.

14. The person mentioned in the report may not influence or threaten the whistleblower or other persons involved in the examination of the report for having reported the possible violation of regulations.

15. Whistleblower reports are examined within a reasonable time, but not later than within three months from the date of receipt of the report.

16. Whistleblower reports and related documents are stored for at least five years from the date of receipt of the report in accordance with the law and Tet Group company document management procedures.

17. Tet Group companies ensure the provision of information about the examination of the whistleblower's report to the whistleblower in accordance with the procedure specified in the law.

The content of the whistleblower report

1. As a whistleblower, individuals have the right to raise concerns, especially regarding the following events - potential violations, according to the Whistleblower Protection Law:

- Inaction, negligence, or malicious exploitation of the official position by officials;
- Misuse of public funds or assets;
- Endangerment of food safety;
- Endangerment of occupational safety;
- Violation of public procurement regulations;
- Corruption;
- Tax evasion;
- Endangerment of construction safety;
- Endangerment of public order;
- Violation in the domain of financial and capital markets;
- Fraud;
- Endangerment of public health;
- Endangerment of environmental safety;
- Violation of human rights;
- Violation of competition law.

2. Intentionally providing false information, disclosing information containing state secrets or trade secrets, and reporting solely for personal interest infringement are not considered whistleblowing.

3. Whistleblowing can also be done by providing information publicly if, for objective reasons, it is not possible to use the internal whistleblowing system of the Tet Group company in accordance with the Code of Conduct, or if the violation indicated in the whistleblower's report is not rectified for an extended period without objective reasons. Failure to recognize a person's complaint as a whistleblowing report and to examine it are not considered objective reasons.

4. Submission of the whistleblower's report and its content: It is preferable to submit the whistleblower's report using the form (see attachment of Code of Conduct in Latvian language). However, if the report is submitted in a free form, the following must be indicated:

- Information about the submitter (name, address, and if necessary, other information that facilitates communication with the submitter);

- Information within the person's knowledge regarding the event being reported (potential violation), including: a description of the event, specifying specific facts; information about individuals or legal entities who are believed to be involved in the wrongdoing; whether the information about the event (violation) was obtained while performing job duties or establishing legal relationships related to job duties, if a previous report has been made about this event (violation), and attach a response if received.

- Indicate that it is a whistleblower's report.

5. The report can be submitted in writing or electronically. If possible, copies of documents that prove the circumstances mentioned in the report should be attached to the submission.