

Code of Conduct of Orange Slovensko, a.s.

January 2026

Contents

Management Representation 3

Introduction 4

Advice and information 5

Relationships within the Orange Group 6

- **Internal relations** 6
- **Occupational Health and Safety** 6
- **Sustainability and environmental protection** 6
- **Relations with suppliers, customers and public institutions** 7
- **Conflict of interests** 8
- **Gifts** 9
- **Anti-corruption policies** 11
- **Confidential information handling** 12
- **Fair competition** 13

More information 15

Management Representation

“As a trusted partner, Orange provides everyone with a key to a responsible digital world.

Trust is key not only for achieving our strategic plan, Lead the Future, but also for our business in Slovakia.

Our approach to ethics and compliance contributes to this trust by fostering a culture of integrity with zero tolerance for corruption of any kind.

It is a proactive approach built on our values and our history, our Code of Conduct and our anti-corruption policy.

It is also an evolving approach that is becoming stronger as we embrace the demands of our stakeholders and new regulations.

It applies, without exception, to the conduct of all Orange Group employees worldwide, at all levels within the company. This also applies to all of Orange’s activities, from innovation to networks, from selling our products and services to finance, from sustainable development to communications, from public affairs to digital.

We hereby reaffirm our commitment to uphold these principles of integrity, in particular the principle of zero tolerance for corruption and influence peddling, in our every day operations.”

Mariusz Gatza

Chief Executive Officer and Chairman of the Board of Directors



Introduction

At Orange, we are ready to be guided by the values represented by our brand. It means that everything we do is done in an honest, direct, dynamic, friendly and encouraging way. At work, we follow business principles and strive to do more than what others expect of our company. **This is us.**

We do not tolerate behavior that could compromise our integrity and reputation, harm our economic growth and negatively impact the social environment in which we operate. The rejection of such practices is the essence of the Orange brand.

Occasionally, our employees may come across “grey areas” where the distinction between ethical and unethical is not clear. That’s where this Code of Conduct comes in. It is drawn up to help us act with integrity and make the right choices.

It also explains the support system set up to help employees in such situations.

This Code of Conduct applies to all members of statutory and supervisory bodies, management, employees and contractors of the Company. Where controls on ethical conduct stricter than this Code of Conduct apply in accordance with implementing regulations and local laws, the stricter requirements must always be adhered to.

An Orange Group employee will never be punished for failing to close a transaction as a result of complying with this Code of Conduct.

Think…

It is not realistic for the Code of Conduct to anticipate every difficult ethical dilemma that an employee may have to deal with, so each of us must take responsibility for our actions and act in the spirit of these rules.

If you find yourself facing an ethical dilemma at work, ask yourself the following questions:

- ✓ Would I hide this from my family, my boss, or the media?
- ✓ Am I trying to convince myself that I am doing the right thing?
- ✓ Will my decision harm Orange Group, or will it be meaningless to them? Will I be the only one to gain anything from this?

If you answer 'yes' to any of these questions, the step you are about to take is likely to violate the rules of the Code of Conduct. Avoid it or seek advice.

Advice and information

If you find yourself facing a difficult ethical decision during the performance of your job duties or have questions related to this Code of Conduct, do not hesitate to seek advice.

The aim of the Orange Group is to provide discreet and prompt advice and information related to any of your questions. The following resources are available to you:

1. The e-learning on the intranet contains information and examples of the practical application of this code in work situations.

2. Your immediate supervisors or department managers can assist you by providing authorisation and general advice, and in most cases, they should be the first point of contact. According to this Code of Conduct, they have decision-making authority and are responsible for maintaining accurate records.

Where appropriate, they will involve the relevant departments in the examination, investigation, or disciplinary proceedings in specific cases.

3. In each company of the Orange Group, an ethics advisor is available to assess issues that you may not consider suitable or possible to resolve with managers. You can contact them by phone, email or visit them in person. A report may also by submitted through the **HELLO ETHICS** tool (anonymously or non-anonymously).

4. All contact information and report forms related to these counseling channels can be found on the company's intranet. If you can't find them, ask your manager.



Relationships within the Orange Group

Internal relations

The relationships with employees and among employees at all levels are based on respect and dignity for every individual, as well as on the respect for fundamental human rights. We do not tolerate any form of abuse, humiliation, harassment, discrimination, or defamation of human dignity for any reason.

We believe in the integrity, responsibility, and motivation of our employees. We work on creating conditions that contribute to the development of their professional strengths and a sense of individual responsibility in an environment encouraging greater personal initiative. We also aim to develop collective intelligence and team spirit.

Each employee is expected to be an expert in their work. To maintain their expertise, employees must continually educate themselves and keep track of new trends in their field.

New job applicants are hired and evaluated in a transparent manner on the basis of the candidate's profile in relation to the characteristics required. Any form of discrimination is excluded from the employee selection process. If you suspect unethical behavior, do not hesitate to contact the Ethics Advisor.

Occupational Health and Safety

All employees are required to comply with safety regulations and take care that their safety, safety of their co-workers and other persons is ensured and no material damages are caused.

Sustainability and environmental protection

We appreciate the environment. Thus, our activities seek the best compromise between economic benefits and environmental aspects. We take steps to be environmentally friendly, we make efforts to optimize our use of energy and other natural resources.

Relations with suppliers, customers and public institutions

We conduct our business in a fair relationship with our partners based on mutual trust. Because we consider this to be a fundamental pillar of long-term cooperation.

Orange has built their success on the ability to deliver quality service to their customers.

We actively develop relationships with our suppliers based on trust, integrity, and respect to ensure the best possible service for our customers. Expect our suppliers to adhere to ethical standards that align with our own, as outlined and detailed in this Code of Conduct.

We strive to differentiate ourselves from the competition through a positive customer experience based on the quality of our service and our relationships.

We undertake to comply with all obligations arising from laws and other generally binding legal regulations.



Conflict of interests

Historical or active professional and personal ties to our partners or suppliers, particularly in positions with influence over business decisions between companies, may lead to unethical violations or preferences.

Circumventing or hiding conflicts of interest may lead to severe personal penalties for Orange Group employees, including termination of employment contracts.

We have an established process for reporting potential conflicts of interest based on simplicity and efficiency (whether it is ad hoc reporting or annual declarations for management and employees working in the most exposed positions).

Conflict of interest arises:

- where **the interests of the company overlap with the private interests of an employee** or with the interests of a legal entity or a natural person who is a relative of or has a close relationship with the employee, and
- where such interest **my affect** or
- where it **seems that it affects an independent and impartial performance** of the employee's job.

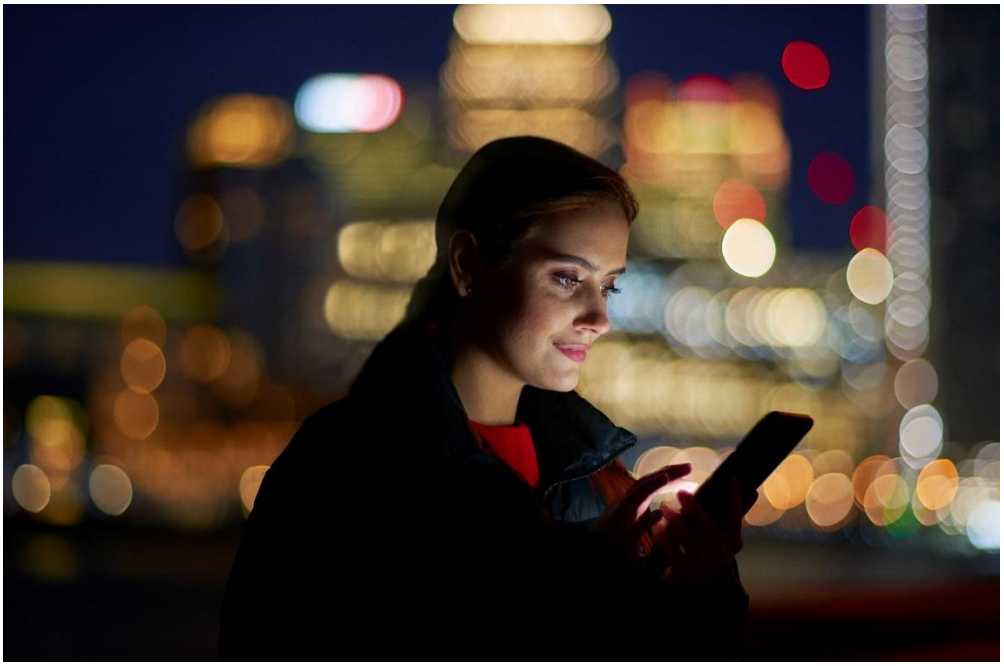
Examples of conflicts of interest:

1. inappropriate tempering with the hiring, promoting to higher positions or payments to family members or close friends of company employees;

2. using the position in the company to push a business entity where friends or family members work to win a tender or to maintain a business relationship with the company;

3. being a company employee and, at the same time, working for one of company suppliers or a competitor: the criteria differ depending on the position of the employee in the company;

4. using company property, including e-mail accounts, company trade name or equipment for a business entity which is not a member of the Orange Group for personal gain.



Gifts

Giving a gift

Gifts may be offered openly, as a courtesy or as a sign of respect, only if the nature of the gift is appropriate to the relationship and consistent with general business and local practices. Gifts may only be offered on behalf of Orange and not on behalf of a specific employee. Preferably, gifts should be marked with the “Orange” logo.

Accepting a gift

Gifts may be accepted only if they are modest, offered openly as a sign of respect or courtesy.

Basic principles

There are some key principles which can help us decide whether to accept a gift:

1. the value of a gift should be acceptable, i.e. it should be within the limits specified by the company (see below);
2. timing of giving a gift - it is unacceptable to accept a gift at a time when a contract with a supplier is up for review/renewal because of the potential impact it may have on a decision e.g. on the terms of the contract

The value of the given or accepted gift is set at EUR 70 per person per event.

If an employee is offered or offers a gift exceeding the limit of EUR 70 per person/company, it is necessary to **request approval of an exemption in advance** via an electronic form available on the company’s intranet.

Corporate hospitality

In many parts of the world, corporate hospitality is considered a legitimate part of building a company's profile and its business relationships. However, excessive or too frequent hospitality can influence or may appear to influence business decision-making.

Any hospitality exceeding the limit set by the relevant country must fulfil a legitimate business purpose and must always be registered.

Any hospitality **exceeding the pre-set limit must be approved**. Before an employe accepts e.g. invitation to a conference, he/she is obliged to fill in an e-form.

Conferences

Any employee attending a specific event or conferences should observe the following rules **with regard to the costs** of attendance (accommodation, travel costs, conference fees):

- If an employee **is only invited as a guest** (not actively contributing to the event), **all related costs should be born by Orange**. Accommodation and travel costs should respect the limits set by the travel policy. **Any exception to the cost limits should be properly validated BEFORE the event/conference takes place.**
- Where an employee i**s invited as an active speaker, expert** contributing to the event agenda, **the cost share should be considered** and confirmed by the Compliance Specialist BEFORE the event or conference takes place.

Business lunch/dinner

Invitations to a business lunch (you are invited or you invite your partners) **are acceptable** as a mark of courtesy or as a sign of greeting. However, certain rules and restrictions should be observed.

- There **should not be more than 4 invitations in the last 12 months.**
- Observe the value limit of **EUR 70/person/event**.

If these limits are exceeded, please contact the **Compliance Specialist** for appropriate guidance.

Anti-corruption policies

The Orange Group, including its subsidiaries and joint ventures controlled by the Orange Group, are committed to conducting their business with honesty and integrity and in compliance with all applicable laws. Orange implements a zero tolerance policy towards corruption in all its business activities across the group.

Examples of corruption:

- × bribes for priority treatment;
- × unfair agreements with contractors, customers or partners;
- × unacceptable gifts (accepted or offered)

Transparency is a key rule. For more information, see Anti-Corruption Policy of the Orange Group or the internal regulation.





Confidential information handling

In the course of their duties, the company employees may come across non-public information belonging to the company or one of its affiliates.

Non-public information includes all personal or confidential information provided by customers, contractor or employees. This also includes, but is not limited to, the Group's customers, its finances, product development and marketing strategy, trading prices, undisclosed financial results, changes in the Group's shareholding structure, management or Board of Directors, as well as any information on the signing and withdrawal of material business contracts, mergers, corporate acquisitions, disposals or liquidations.

Confidential information must not be communicated outside the company, nor used by employees for purposes other than related to work within the company.

In particular, **it is forbidden to use this information**:

- for any trading in the shares of Orange or other publicly traded companies, whether directly or through brokers;
- to give advice to others inside or outside the company related to dealing in the shares prior to the disclosure of such information.

Fair competition

Competition is a fundamental pillar both for efficiency and innovation. For customers, it represents the best options for making the right decisions.

Company employees must not use improper means (such as obtaining a competitor's confidential pricing plans through friends or consultants) to obtain information about a competitor, or act (or induce others to act) in a manner inconsistent with their duties, or seek to obtain an improper advantage for the company.

Example of unacceptable conduct:

- requiring other companies to do business with the company as a condition of doing business with them;
- using the fact that the company buys from a customer or potential customer as a tool to attract or retain that customer;
- making a business decision on the basis of an existence or non-existence of a reciprocal relationship demanding or accepting discriminatory discounts or prices without consulting the legal department (in some cases, engaging in such conduct may be a violation of applicable laws);
- demanding or accepting discriminatory discounts or prices without prior consultation with the legal department.

Meetings with competitors

In areas, where the Group collaborates on matters impacting both parties within the industry (e.g. technical standards), there may be concerns about the disclosure of anti-competitive information, thus the company employees need to exercise caution when meeting with representatives of competing parties. It is good practice to request a meeting agenda in advance.

Don't be afraid to walk out of business meetings where the discussions head towards unwanted topics. If you do so, ask that your objections and departure are recorded in the minutes. In particular, negotiations with competitors on the following topics may constitute unlawful anti-competitive conduct:

- price policy
- launching a new product or service on the market
- sharing a market or allocation of markets;
- refusal to provide customers with supplies;
- any coordinated approach to suppliers, distributors or customers;

Personal data protection

Personal data protection is one of the basic prerequisites for a successful business. Cooperation with business partners, customers or employees is based on mutual trust. Thus we take care to comply with all obligations based on the GDPR as well as Act No. 18/2018 Coll. on the Personal Data Protection and other applicable generally binding legal regulations.

The company has a Data Privacy Officer (DPO) appointed.

Employees are obliged to protect work-related information as such information is considered confidential. At the same time, employees are obliged to comply with the duties specified in the internal procedures in this area.



More information

Seeking advice and professional ethics violation reporting

If an employee of the company is in a situation that would allow the conduct contrary to this Code of Conduct, or if there is a reasonable suspicion that another person is violating the Code of Conduct, the employee is obliged to discuss the situation with his/her manager.

In some specific situations, it may be impossible or inappropriate to discuss the matter with a manager or section director. If this is the case, our **Ethical Advisor** or **Compliance Specialist** appointed by the company may be contacted.

The report may be made anonymously or non-anonymously using the **HELLO ETHICS** group tool.

The company will never punish employees who contact the authorities for accounting irregularities, violations of applicable laws, or for compliance with any other section of this Code of Conduct. The company will provide training to ensure that all employees and their supervisors are prepared to act in compliance with this Code of Conduct and local regulations.

Compliance with the Code of Conduct

Violations of this Code of Conduct will result in an investigation and possible disciplinary action to prevent further violations in the future. Decisions on disciplinary action will be made in accordance with the company's disciplinary procedures.

