

..... 2015

Code of Conduct

(Verhaltenskodex)

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mobilezone[®]
better be clever

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INTRODUCTION

mobilezone holding ag was founded in 1999 and is now Switzerland's leading independent telecoms specialist. The mobilezone Group employs over 900 people at its sites in Regensdorf, Urnäsch, Zweidlen, Zug, Vienna (A) and Obertshausen (D). Its portfolio encompasses a full range of mobile phones and tariff plans for mobile and landline telephony, digital TV and Internet services from all the main providers. This is supplemented by independent advice and other services for domestic and business customers, along with repair services. The company's services and products are available from 129 shops in Switzerland and 40 shops in Germany and online via various web portals. In Germany, the group also operates on the wholesale market and supplies specialist retailers.

Our ambitions are to create added value for our customers, generate attractive returns for our shareholders and be a preferred employer for our workforce and a highly regarded company among the Swiss public. Achieving this requires a high degree of integrity and professionalism.

We owe our success since 1999 to our constant striving for integrity, our excellent customer services and our unfailingly professional commitment. It therefore has been and still is absolutely essential that both management and employees make it their top priority to adhere to legal requirements and internal regulations.

Success in our business depends on the trust of all our stakeholders: the trust of our customers, our shareholders, our employees, the media and also society as a whole. This Code of Conduct is intended to form the basis on which we can maintain and build upon that trust. The Code of Conduct will also help us to establish a system of shared values.

Furthermore, the mobilezone Code of Conduct provides every member of staff with a framework for their everyday conduct when working for our company. It contains practical guidance on behaviour, especially in "grey areas". In many cases, it supports everyday common sense. The mobilezone Code of Conduct is not exhaustive. Nor are all members of staff equally affected by it. The basic principle should be that we act as loyal, motivated, honest and responsible people.

All members of staff are expected to comply with the values and principles enshrined in this Code of Conduct.

We, the members of the Board of Directors and the Management Board of the mobilezone Group, give our full personal support to the values expressed in the Code of Conduct.

VISION

We want to be perceived by customers in Switzerland as the telecoms specialist who offers all the main products from network operators and manufacturers. We continuously expand our own services so that customers recognise the added value we offer.

MISSION

We offer our customers the complete range of mobile phones and accessories as well as all subscriptions for TV, Internet, landline and mobile services, at the best prices. We support our customers in every way at all times with independent advice and an extensive range of services – both online and near at hand in one of our nationwide network of shops.

CUSTOMERS

Our customers are enthusiastic about us. Customers only renew their trust in us if we exceed their expectations. We want to surprise them. We want our customers to tell their friends about the positive experience they have had with mobilezone.

We want to be fair and honest with customers and open to their complaints, remarks and suggestions.

We keep our promises to customers. This by no means only applies to employees with direct customer contact. Only if everyone keeps their promises can we keep our promises to our customers. What do we do if, despite our best efforts, something goes wrong? We say honestly and at an early stage that we cannot keep our promise. We try to give a new promise, in keeping with the changed circumstances. Then we do all we can to ensure that things go right, second time round.

We make our customers feel that we take them seriously. We don't lecture our customers but listen to them. It is our job to understand exactly what the customer wants, fulfil their wishes as far as possible and even surpass them, for example with a new idea.

For our customers, we also represent mobilezone even in our time off. That is the reality for most of us. Our friends and family know that we are mobilezone employees. That also puts us under an obligation. If we are addressed by mobilezone customers in our free time, then those customers have spoken to mobilezone. We take the customer seriously, listen to them, address their concerns or pass them on as we would if we were at work.

We want to ensure that customers in our shops feel confident that they will find a pleasant shopping environment and that disabled customers also have unhindered access to the shops.

We want to respect the privacy of our customers and employees and comply with legislation on the use of personal data.

We want to strive to give the customer as much product information as possible.

EMPLOYEES

We want to provide our employees with a safe and healthy workplace and treat them with respect and appreciation.

We want to develop the technical expertise of all our employees.

Discrimination against or harassment of any employee on the basis of race, ethnic origins, gender, religion, political allegiance, social or national background or any other similar reason will not be accepted.

Employees should have the courage to say "No!" if they are expected to do something that is in breach of the law or other regulations. They should show this courage towards their managers, colleagues, suppliers and customers.

Before taking any action, staff should ask themselves 3 vital questions:

1. Is it 100% legal?
2. What would a newspaper say about it?
3. Will I be able to sleep with a clear conscience after this day at work?

SUPPLIERS

We conduct business with all our suppliers on the basis of honest and open relationships. Bribery or any similar activity will not be accepted. We want to work for long-term business relationships that are beneficial for both sides.

COMPETITORS

Like mobilezone, our competitors have their own legitimate business interests. Our customers should benefit from that rivalry. We behave fairly in competition and present our arguments openly and confidently to our customers.

ACCEPTING GIFTS

Any gifts or other personal benefits received from business partners with a value of over CHF 150.00 should be declared to the Management Board in writing. The Management Board will decide on their use.

Often it is not unambiguously clear what is allowed and what is prohibited. Rely on your common sense and, if in doubt, consult your line manager or contact the relevant member of the Management Board at mobilezone.

INVITATIONS TO EVENTS

Invitations from business partners to events in Switzerland or elsewhere, regardless of whether they take place in the employee's working hours or free time, with a value of over CHF 150.00 must be approved by the Management Board in writing.

BRIBES

Under no circumstances may employees of the mobilezone Group receive or accept the payment of bribes or other gifts or benefits which would adversely affect their independence.

In particular, employees are under an obligation not to demand, accept or offer any bribes.

In many cases, accepting and offering gifts constitutes accepting an advantage or bribery and is a criminal offence. It is also important to avoid giving the appearance of being under an inadmissible obligation.

INSIDER DEALING

Employees are legally prohibited from making use of any information to which they have access in the course of their work that is not in the public arena when buying or selling their employer's shares. Infringing the law on insider dealing is a serious offence and has consequences under employment law, and can lead to compensation claims and prison sentences.

ENVIRONMENT

We take care of the environment. Taking care of the environment may not be consistent with the commercial interests of the company. We are aware of this and endeavour to use limited resources sparingly and to minimise the release of harmful substances and other emissions.

APPLICATION AND MONITORING

Senior managers and employees at mobilezone must comply with these guidelines. They represent an integral part of the employment contract and must be given to all new managers and other employees at the start of their employment. Employees found to be in breach of these guidelines will be subject to disciplinary measures, including the possibility of their employment being terminated.

We will appoint one member of the Management Board of our Group to be responsible for ensuring compliance with the Code of Conduct and providing information about it as required to employees, suppliers, customers and other members of our social environment (stakeholders).

Any queries and/or the exposure of breaches of these principles must be sent to the Chief Financial Officer or the Head of Human Resources. Employees raising questions or highlighting breaches of these guidelines must not be discriminated against by their line managers.

Regensdorf, 11 December 2014

On behalf of the Board of Directors and the Management Board of the mobilezone Group

Urs T. Fischer
Chairman of the Board of Directors

Markus Bernhard
Chief Executive Officer