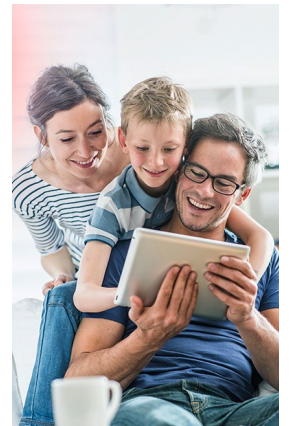
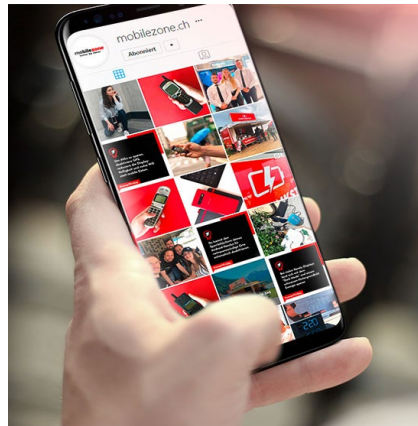




# Code of Conduct

of the mobilezone Group



# Introduction

Dear Employees,

companies are not measured by their financial performance alone. In fact, they are also assessed based on how they achieve their results. Here, the financial success of a company should be in harmony with sustainable and responsible business practices. The compatibility of both areas is mobilezone's top priority. mobilezone helps its customers to receive the offer that is best for them at minimal cost to mobilezone. This is what our brand stands for. The mobilezone Group, including its subsidiaries in Switzerland and Germany, is committed to creating high added-value for its customers, realising an attractive return for its shareholders and investors, being an attractive employer for its employees and a responsible company at its locations.

The highest degree of integrity and professionalism is called for to achieve this. In this Code of Conduct, we lay down the principles according to which we wish to act and which we expect our employees, the bodies within our company and our business partners to adhere to.



The success of our business depends on the trust of all our stakeholders. With this Code of Conduct, we are creating the foundation for obtaining this trust and developing it even further. In addition, our Code of Conduct helps us to ensure a common system of values. It provides a framework for conduct on a daily basis. With this Code of Conduct, we are creating a common basis for ethical conduct towards all our stakeholders.

The Code of Conduct is therefore binding for all employees at all levels. The Board of Directors and company management of the mobilezone Group personally stand behind this Code of Conduct and support compliance with it.

19 may 2022

On behalf of the Board of Directors and company management of the mobilezone Group,

Olaf Swantee  
President of the Board of Directors

Markus Bernhard  
CEO

## Scope

It is the responsibility of all employees to ensure that their own conduct and that of all persons who report to them is entirely in keeping with the applicable law, this Code of Conduct and applicable, internal directives. mobilezone does not tolerate any violations and will take disciplinary measures up to possible termination of the employment relationship against employees who violate the law, this Code of Conduct or applicable, internal directives. No retaliatory measures may be taken against employees who ask questions or address violations of the directive in good faith. All reports will be dealt with confidentially.

The principles within this Code of Conduct are core elements of the corporate culture of mobilezone, and compliance with them is mandatory for all employees across the Group. The Code of Conduct constitutes a fundamental part of the contract of employment.

The principles serve as a guideline and are intended to be an advisor. If an answer cannot be found in them, then supervisors and HR are available to provide assistance.

# We maintain open and constructive communication as equals

We maintain open and honest communication with our employees as equals, based on the fundamental values of respect and dignity. This includes a culture of active and fair feedback, which manifests in regular exchanges between supervisors and employees.

Our corporate culture allows for constructive criticism and accepts opposing views as long as they are presented in an appropriate manner. Communication with our employees is characterised by transparency, honesty and fairness.

Company-relevant information is first communicated internally before it is released to the outside world.

...what does this mean in practice?

I address (critical) topics directly with the person in question, and we attempt to resolve the issue together. I bring up criticism in an appropriate tone, allow my counterpart to finish speaking, and I am interested in finding a solution that is satisfactory to both sides.

# We promote diversity and respect

People from different cultures and countries work under the umbrella of mobilezone and all its subsidiaries. This diversity is anchored in our DNA. We do not in any way tolerate discrimination based on age, disability, origin, nationality, gender, skin colour, religion, marital status, sexual orientation or political views.

We will not stand for any sexual harassment, and strictly oppose conduct that is considered to be intimidating, coercive or bullying, and will punish such conduct accordingly. The health of our employees is very important to us. We commit to maintaining the highest health and safety standards in all areas of business.

We consider ourselves to be a training and teaching company. We undertake to convey the necessary knowledge to our apprentices, placement students and trainees in the business areas in which we operate. Our primary objective here is to retain them as employees after successful completion of their training period.

...what does this mean in practice?

I treat my subordinates, colleagues and superiors with respect. I never discriminate against them based on physical and other characteristics. I neither commit sexual harassment, such as unwanted touching, insinuating jokes or solicitation of sexual favours under pressure, nor do I tolerate these happening to me or others. If I make observations in this regard, I intervene and report my observations immediately.

## We treat confidential information with care

Insider information refers to confidential, non-public information that can have a considerable effect on the price of the securities of a company if it were to be made public.

mobilezone follows strict rules and regulations in connection with the dissemination of market-price-relevant information. Employees who have access to information during the course of their work, which is not accessible to the public, and profit from this information when buying or selling stocks of the employer, open themselves up to legal sanctions. Violation of the laws on insider trading is a serious offence, subject to consequences under labour law, damage claims and imprisonment.

It is also forbidden to pass insider information to other employees, with the exception of employees who need to know this information as part of their own work. They must also be aware of their obligations when dealing with such information. It is against the law to pass insider information to third parties who could make an investment decision based on this information.

### ...what does this mean in practice?

If, during the scope of my work at mobilezone, I have access to information that can decisively influence the price of mobilezone securities if it were to become public, I am aware of this fact. Furthermore, I do not misuse this knowledge, and I do not pass it on to other employees, family members or friends, nor do I use it myself for my own personal, financial benefit.

# We do not bribe and we do not accept bribes

## ...what does this mean in practice?

If a business partner or other partner of mobilezone approaches me with a gift or, for example, an invitation to an event domestically or abroad, I exercise caution. Because often the distinction between what is allowed and what is prohibited is not explicitly clear. I rely on my common sense and contact my supervisor or a member of company management. The anti-bribery principle also applies to my private life.

mobilezone and its subsidiaries in no way tolerate theft, corruption or the unfair granting of any kind of benefits. Fraud, the payment of bribes, the granting of unauthorised discounts or under-the-table payments is forbidden. Even the mere semblance of corrupt behaviour can harm the image of mobilezone and its employees. We therefore do not condone any behaviour that could be construed as bribery or unfair behaviour, even if there is no such intention.

Under no circumstances do employees of the mobilezone Group accept money, gifts and other personal benefits. We expect our business partners to abide by our principles and to observe and respect them.

Employees of mobilezone and its subsidiaries may accept individual customary courtesy gifts or invitations; however, they must adhere to the internal guidelines.



# We comply with the law and directives

Employees who work for mobilezone or one of its subsidiaries respect the applicable laws and directives in the countries in which we work and comply with them.

Furthermore, we comply with all laws and regulations that apply to our business operations in our industry.

...what does this mean in practice?

I am aware that there are laws and rules that I must obey. I always use my common sense in all aspects of my daily work. Here, I always ask myself three questions:

- 1 Is what I am doing legal?
- 2 What would a newspaper write about it?
- 3 Can I go to sleep at night with a clear conscience?

# We maintain respectful and professional customer relationships

Our actions are focused on our customers.

We thrill our customers. Customers only maintain their loyalty if we go above and beyond what is expected; we want to surprise them and reach the point that they tell their friends about the positive experience they have had with mobilezone or one of its subsidiaries. We treat our customers honestly and fairly, and are open to complaints and suggestions. We keep promises. We do not lecture customers, but rather listen to them. It is our duty to understand exactly what customers would like in order to fulfil their wishes in the best possible way. Discretion when dealing with our customers is our top priority. We protect customer data and treat it confidentially.

We make sure that our customers feel comfortable in our shops, are met with a pleasant shopping environment and that customers with impairments or disabilities can still access our services.

...what does this mean in practice?

My conduct towards our customers is appropriate and honest and I address their wishes. I ensure that the customer relationship ends or continues with a positive feeling on both sides.

# We maintain relationships with our shareholders that are characterised by openness and trust

Shareholders have invested their assets in mobilezone as part owners. mobilezone cultivates these trust-based shareholder relationships, and orientates its conduct around the interests of its shareholders. We undertake to increase the value of the investments in compliance with laws, regulations and directives. mobilezone practices active risk management and actively implements compliance principles.

We respect the equal treatment of all our shareholders and practice a clear, transparent and timely information policy. Here, the company complies with the requirements of the Swiss Exchange (SIX).

...what does this mean in practice?

I adhere to the principle of equal treatment of all shareholders and comply with the SIX rules and directives.

# We treat our employees, customers and the environment responsibly and think about tomorrow even today

We take care of our environment. By this, we mean not only ecological aspects, but also economic and social aspects, whereby we understand sustainability to be in harmony with the financial health of mobilezone and its subsidiaries. We use resources circumspectly and sparingly, and ensure that we minimise the release of pollutants and other emissions to the greatest possible extent. With regard to our products, we recognise the effect of the supply chain on our ecological footprint and maintain a dialogue with the manufacturers with regard to sustainable production.

We include ecologically sustainable products in our product range and contribute to a sustainable device cycle by means of repairs and refurbishment for the purpose of returning smartphones to the market and in so doing conserve resources. Regarding our defined sustainability topics, we regularly collect the related key performance indicators and develop improvements in this area.

We uphold social sustainability by paying fair, up-to-date wages that are set on the basis of education and training, and work experience, but not on the basis of gender. Our working conditions are modern, up-to-date and fair.

We always make every effort to improve ourselves and establish new measures in all areas of sustainability.

## ...what does this mean in practice?

I support the sustainability measures of my employer, mobilezone, by implementing stipulated measures in my daily routine, or I recommend new measures. Furthermore, I conduct myself in my professional life in accordance with the sustainability principles of mobilezone.

## We act fairly in competition

We respect and appreciate the free market economy characterised by competition. Our competitors and business partners, like us, have legitimate business interests. If we were to collude with our competitors, or conversely harm their reputation, this would reflect back on us and harm the trust of our existing and prospective customers. Furthermore, competition law protects the free market economy in the sales channels. Here too, we refrain from unlawful agreements.

Our customers should profit from market diversity. Consequently, we always act in a fair and proper manner towards our competitors.

### ...what does this mean in practice?

I never talk in a defamatory way about companies that are in competition with mobilezone. However, I talk openly and confidently about arguments that speak in favour of mobilezone. I do not make agreements with competitors concerning prices, and do not give any binding pricing specifications to our business partners.

# We expect the highest level of integrity from our business partners

We establish business connections with all our partners on the basis of honest and open relationships that are rooted in fairness, with a view to maintaining them over the long term. We maintain a constant, open dialogue with our business partners. We expect high standards relating to integrity and performance from our business partners (device manufacturers, providers, suppliers etc.). We expect our business partners to comply with local laws, industry regulations and the contractual terms.

We expect our business partners to respect human rights and treat their employees respectfully. In addition, we expect that our business partners have taken appropriate precautions in their own companies to maintain the health of their employees and other reference groups that could be affected by their activities. They must also think and act responsibly and in a resource-friendly way regarding sustainability. Furthermore, we expect high-quality products and services from our business partners in harmony with the applicable laws and directives. Conversely, our partners can rely on mobilezone to be a fair sparring partner that adheres to the applicable laws and rules, is familiar with the contractual obligations, and also complies with them.

## ...what does this mean in practice?

In day-to-day business, I adhere to the contractual agreements we have with our business partners as well as to all related laws and obligations. Conversely, I expect my business partners to adhere to the applicable law and guidelines as well as industry regulations and contractual terms. If I discover violations, I address these immediately, or report them to the responsible office. In case of doubt, I contact my supervisor.

## We avoid conflicts of interest or disclose them

Conflicts of interest can occur if personal interests or family, as well as friendship ties between employees, are pitted against the interests of the company. A conflict of interest can arise, for example, when hiring employees or awarding contracts.

However, conflicts of interest can also arise without any active intervention. Generally, we expect our employees to follow ethical and moral standards of conduct, and avoid activities that have a negative influence on independent and objective judgement.

If employees are concerned that they are in a conflict of interest, they are encouraged to inform their supervisors.

### ...what does this mean in practice?

I avoid business activities or secondary employment that interferes with mobilezone's course of business. Furthermore, I avoid financial investments in suppliers and other companies that result in my no longer being able to act objectively and in the interest of mobilezone or its subsidiaries. I do not influence mobilezone to do business with companies in which I, relatives or friends have invested.

## We protect our data

We treat all the personal data of our employees, customers and business partners with the greatest care. To safeguard the data, our employees are obligated to take all measures that help to protect our IT systems both against internal as well as external data theft. The data protection officer must be informed immediately if a violation of the protection of personal data is discovered.

...what does this mean  
in practice?

I handle the knowledge and confidential data entrusted to me carefully and do not pass it on to third parties. I am careful when working with business computers and do not pass any information on to third parties that could harm mobilezone (for example in the event of a phishing attack). If I discover a data privacy violation, I report it immediately to the data protection officer.



## We are careful with company property

We protect the tangible and intangible property of mobilezone, in particular hardware and software, vehicles, money, confidential information and working time. Company property may only be used for private purposes if the express consent of the supervisor has been obtained for this in advance.

Employees act at all times within the scope of their competences. When using the financial assets of the company, employees must ensure that all transactions are booked properly and correctly in the books according to generally recognised accounting principles and practices.

...what does this mean in practice?

I handle the property of mobilezone and all its subsidiaries with care. In general, the following applies: I protect the tangible and intangible property of mobilezone, only use it for its underlying purpose, and record all business transactions accurately and carefully.

# We are conscious of our roles as private individuals, employees and ambassadors of mobilezone

## ...what does this mean in practice?

I am aware of my responsibility as a mobilezone employee, and/or that I act as a role model as a member of the senior management team: I know that remarks I make may not only reflect on me but also on mobilezone as my employer. I am therefore careful about making political remarks on social media and other channels (for example, in WhatsApp status messages, LinkedIn articles and posts, and Instagram and Facebook posts), which are noticed by our external target groups. I consider how such remarks could impact on myself and mobilezone and I am aware that it is not uncommon for social media channels to achieve a large reach. I know the risks, such as a lack of clarity and the rapid dissemination of information.

mobilezone's image is greatly influenced by the way we all behave, whether as an employee or a member of the senior management team: we are all ambassadors of mobilezone. As a company, we are in the public eye: customers, partners, investors and other target groups observe what we say and how we behave. Our behaviour and our remarks, both in private and in the business environment, can reflect on mobilezone and shape the company's image.

mobilezone stands for freedom of expression – the right to (political) expression is part of this. However, the fact that mobilezone, as a company, does not express political opinions and does not wish to be associated with political statements needs to be respected.



## Contact person

Reports of violations, or suspected cases of violations, against the principles laid down in the Code of Conduct should be directed to the Director Human Resources and/or Chief Financial Officer via [ethik@mobilezone.ch](mailto:ethik@mobilezone.ch) or via Ethics hotline (<https://report.whistleb.com/de/mobilezone>).

HR and/or your supervisor can provide assistance with questions relating to interpreting the Code of Conduct.