

Code of Conduct

Table of Contents

<i>A message from the CEO</i>	2
<i>Who is the Code of Conduct for?</i>	3
If you are ever unsure about what to do, ask yourself:	3
<i>Speak up! An open door approach</i>	4
<i>Personal conduct</i>	5
What does this mean for me?	5
Where can I find out more?	5
<i>Laws and Regulations</i>	6
What does this mean for me?	6
Where can I find out more?	6
<i>Communications and Confidential Information</i>	7
What does this mean for me?	7
Where can I find out more?	8
<i>A safe and inclusive place to work</i>	9
What does this mean for me?.....	9
Where can I find out more?	9
<i>Respect the Environment & Human Rights</i>	10
What does this mean for me?	10
Where can I find out more?	10
<i>Insider Trading</i>	11
What does this mean for me?.....	11
Where can I find out more?	11

A message from the CEO

How we go about our business, or the way we do business, is just as important as what we do. How we treat our colleagues, our customers and how we work with the community, is essential in building trust. Our standards of conduct are central to TPG Telecom and set the tone for what it's like to work here. Being clear about what we expect is important and doing what's right starts with each of us individually.

This is TPG Telecom's central policy document, outlining requirements that every single person working for TPG Telecom must comply with, regardless of location or position.

There are also additional policies that you need to understand and follow and some of them may be specific to your role or your location. You should familiarise yourself with these additional policies, as applicable to you.

This Code of Conduct will be updated when considered necessary due to changing stakeholder expectations or as result of changes in the law or TPG Telecom policy. Please ensure you check it regularly or when you are looking for guidance on how we conduct ourselves at work to ensure we can all continue to build a great organisation for our customers and great place to work for our people.

Your managers and HR Representatives will work with you to ensure that you understand your obligations as set out in this Code of Conduct.

Who is the Code of Conduct for?

This Code of Conduct applies to all people at TPG Telecom.

When we say TPG Telecom, this includes all the companies that make up the corporate group of TPG Telecom Limited.

When we say 'you' or 'our people' we mean:

- *Permanent Employees*: someone who is employed by TPG Telecom on a permanent full or part time basis under an individual contract or industrial agreement.
- *Fixed Term Employees*: someone who is employed by TPG Telecom on a permanent full or part time basis under an individual contract or fixed term contract for a defined period.
- *Casual Employees*: someone who is employed by TPG Telecom on an hourly basis.
- *Contractors/ Consultants*: someone who is employed and paid by a third party and their services are contracted to TPG Telecom.

Non-controlled entities of TPG Telecom, if any, are encouraged to adopt similar principles and standards.

What does this mean for me?

- Regardless of whether you are a permanent employee, fixed term, casual or contractor, you are integral to TPG Telecom (for however long or short a time).
- Following the Code of Conduct is critical to being a part of the TPG Telecom team.
- The principles and polices outlined and referred to in this Code of Conduct are very important and failure to follow them could lead to disciplinary action up to and including termination of your employment.

If you are ever unsure about what to do, ask yourself:

- Is it legal?
- Does it feel right?
- Will my action stand the test of time?
- How would I feel about it afterwards?
- How would it look on the front page of the newspaper?
- Could I justify it to my family?

If the answer is 'no' or 'I'm not sure' to any of these questions, then you should seek support. You can speak to your manager or any other TPG Telecom colleague that you trust- they might be able to give you the guidance and advice you need. If you do need further help, please contact the TPG Telecom Legal team who will be able to assist or put you in contact with someone who can.

Speak up! An open door approach

Everyone at TPG Telecom should feel comfortable to discuss a concern or issue with relevant people within TPG Telecom when they need to.

If you see any behaviour at work which you feel may be a breach of our Code of Conduct or seems illegal or unethical, please report it – it is the responsibility of every employee to do so.

While most issues can be resolved by discussing them with your manager, our open-door approach also helps support raising issues with more senior leaders and other appropriate people within TPG Telecom. You can also raise issues with your HR Representative, or Risk & Audit Representative.

If you prefer to remain anonymous or feel uncomfortable reporting issues via the channels above, you can contact the Whistleblower hotline, which we call Report It. The Hotline is an independent service where you can, anonymously (if you choose), report a complaint, issue or concern, which will then be reviewed and where appropriate investigated.

We will not permit any form of retribution against any person, who, in good faith, reports known or suspected violations of the Code or any other Company policy. The Employee Assistance Program is also available to provide confidential counselling services and support to employees who may be raising an issue through the hotline. The EAP can be contacted on 1300 360 364.

Whistleblower Hotline: 1800 500 965

Personal conduct

At TPG Telecom, we act with honesty, integrity and fairness and don't give or accept improper gifts or entertainment.

We take a zero-tolerance approach to fraud, bribery and corruption. We expect all third parties acting on our behalf to do the same.

We take extra care when accepting or offering gifts and/or hospitality to ensure it is modest in amount and infrequent in occurrence, particularly when we are in the process of negotiating a business contract. Under no circumstances are such items used to improperly sway a business outcome. We never exchange gifts, hospitality or entertainment with our competitors as this may create an actual or perceived conflict of interest.

We sometimes provide donations and sponsorships on behalf of TPG Telecom in support of heart-felt causes we are passionate about. Please ensure that you contact the External Affairs (and Risk and Audit) team(s) before making a donation on behalf of TPG Telecom.

We act in the best interests of TPG Telecom at all times. This means that all personal interests, relationships or activities must not get in the way of doing what's best for TPG Telecom when doing our jobs.

Sometimes others can create a potential or perceived conflict of interest on your behalf. An example would be when a family member starts working for a competitor or a supplier.

We disclose all material personal interests, relationship or activities we have that could potentially conflict with our jobs to Human Resources and prevent conflicts by avoiding those things that could be seen as influencing us on the job.

We also don't use our positions to benefit ourselves whether that be indirectly via suppliers or directly by learning about business opportunities at work and taking them for ourselves whilst knowing that TPG Telecom could be interested in pursuing them. This includes not directly competing with TPG Telecom.

What does this mean for me?

- Act in the best interest of TPG Telecom at all times.
- Don't offer or accept any bribes or payments, whether directly or indirectly, of any amount whatsoever.
- Don't offer or accept any gifts or hospitality that is significant in amount or frequent in nature or has the potential to improperly influence, or be perceived to improperly influence, a business outcome.
- Ensure all gifts and hospitality given are accurately recorded through registering them on the gifts and hospitality register.
- Don't offer gifts or hospitality to government officials or make political donations. Ensure you understand the full scope of who is deemed to be a government official.
- Conduct proper due diligence on all charitable contributions, suppliers and other third parties acting on our behalf to identify any direct or indirect relations with government officials or potential conflicts of interest prior to engaging with them.
- Avoid conflicts, including those that could be seen as influencing you on the job. Immediately disclose any real or perceived conflicts with Human Resources when they arise.

Where can I find out more?

Please refer to your intranet and view:

- Anti-Bribery & Anti-Corruption Policy
- Gifts & Hospitality Policy

Laws and Regulations

At TPG Telecom, we comply with all applicable laws and regulations and compete fairly.

TPG Telecom takes its obligations under the Australian Competition and Consumer Act seriously. Competition and consumer laws prohibit certain arrangements with competitors including those that would have the effect of substantially lessening competition in a market or that would harm consumers.

Unlawful agreements include agreements that seek to fix or control prices, allocate products, markets or territories, or boycott certain customers or suppliers.

Anti-competitive conduct is not limited to written contracts or agreements. An arrangement or understanding can result from any form of communication with another party from which each party has an expectation of how the other will act.

We are committed to meeting our regulatory obligations and commitments, including industry codes registered by the Australian Communications and Media Authority (ACMA) and applicable international trade laws and regulations that restrict or ban exports of goods or services, including sanctions and embargoes.

What does this mean for me?

- Don't enter into, or attempt to enter into, any agreements or arrangements with competitors or potential competitors about how we conduct ourselves in any dealings with customers or other competitors. Don't even talk to competitors about these things.
- Don't attempt to have an unfair advantage over competitors, suppliers or customers by tricking anyone, taking advantage of confidential information or falsifying the facts.
- Don't share competitively sensitive information (e.g. prices, costs or sales volumes) with competitors.
- Ensure that all business transactions and exports comply with economic sanctions and/or trade control laws.
- Follow all laws and regulations that apply to our business, even those not specifically mentioned in this code.

Where can I find out more?

Please refer to your intranet and view:

- Competition Law Policy
- Economic Sanctions Policy
- Trade Controls Policy

Communications and Confidential Information

At TPG Telecom, our customers' experience comes first. Earning, owning and maintaining our customer's trust is essential in everything that we do.

Whether we are communicating with customers, our people, partners, the media, shareholders, the government, communities or anyone else who comes into contact with TPG Telecom, we will be clear, straightforward, honest, easy to understand and timely.

Our communications must reflect our values and who we are whilst respecting the law, our people and our communications guidelines.

Before we speak on behalf of TPG Telecom, we ensure that we are authorised to release any information externally.

We have a duty to protect TPG Telecom's confidential information and to use confidential information entrusted to us by others only for the purpose for which it has been provided.

We protect all confidential information from improper disclosure and any communication of confidential information should be limited to individuals who need it to carry out their work.

We don't share confidential information (including personal information) unless it is appropriate and legal to do so.

We are committed to upholding the integrity of the market for our securities by providing all investors with equal and timely access to price sensitive information that we are required to disclose to the market by disclosing it to the ASX first.

We identify, understand and manage risks and opportunities that may help or limit the achievement of our purpose and business objectives.

You may come across information concerning our customers, suppliers and other third parties when working for TPG Telecom. It is important that you understand and comply with our privacy obligations, and you respect the trust placed in us by customers and third parties who share their information with us. You must not use or disclose the personal information of a third party unless they have authorised you to do so.

We only collect and process personal information which is necessary and relevant to the work we are doing. We protect the content of communications and personal information. It is vital to manage data carefully, to ensure the accuracy and completeness of data, and not to make any unnecessary copies. We do not misuse information, and we only use personal data for the purpose for which it was collected.

What does this mean for me?

- Don't make any public comment or statement (including via social media) unless you have spoken with a member of the TPG Telecom Corporate Affairs team.
- If you are contacted by the media, make sure you refer them to the TPG Telecom External Affairs team.
- Make sure you let the TPG Telecom External Affairs team know if you see any information about TPG Telecom that you think is incorrect or misleading.
- Do not disclose confidential information.
- Only access, use and disclose personal information as permitted in our privacy and security policies.
- We want you to be good ambassadors of our brand, but make sure you don't make personal comments that could be interpreted, even mistakenly, as a comment made by TPG Telecom.
- Take proactive steps to ensure our customers have a positive experience.

- If you become aware of information that could potentially affect the price or value of TPG Telecom shares or may influence investors' decisions to buy or sell shares, you must report this to the TPG Telecom Company Secretary.
- Don't share confidential or sensitive information about the company with anyone, including in social settings, unless you have approval to do so or there are appropriate protections in place.
- Remember that obligations of confidentiality continue after your employment with TPG Telecom ends.

Where can I find out more?

Please refer to your intranet to view:

- Privacy Policy
- Communications & Social Media Policy
- Information Classification Policy

A safe and inclusive place to work

We base our relationships with our customers and our people on respect for individuals, their qualities and differences and we celebrate diversity.

We don't accept any form of discrimination, harassment or bullying and pursue equality of opportunity in all aspects of employment including recruitment, selection, promotion, development, compensation, discipline and termination.

We protect the health, safety and wellbeing of our customers, our people, partners and our communities and will intervene quickly if health or safety is ever compromised.

We are committed to ensuring a safe environment and support health, wellbeing and a work life balance for all our people.

What does this mean for me?

- Speak up if you have a concern relating to equal opportunity, discrimination, harassment or bullying whether it involves you or someone else at TPG Telecom.
- Ensure you understand and comply with all policies, standards, procedures and arrangements that have been put in place to ensure health and safety at work.
- Report all accidents, unsafe practices and unsafe situations immediately and intervene quickly if you see someone behaving unsafely.

Where can I find out more?

Please refer to your intranet and view:

- Health and Safety Policy
- EEO, Bullying and Harassment Policy
- Diversity and Inclusion Policy

Respect the Environment & Human Rights

We are committed to reducing our impact on the environment. We minimise waste and the release of harmful emissions to the environment through product reuse and recycling, cutting energy use and implementation of waste reduction initiatives. Every sustainable contribution helps!

We adhere to relevant environmental standards and act responsibly with our business partners to ensure they operate without infringing on human rights. We support human rights consistent with the Universal Declaration of Human Rights and we respect those rights in conducting our operations in all locations. We stand fully behind local and international efforts to stop slavery and human trafficking and look for ways to promote these efforts. We have a zero-tolerance policy against trafficking and activities related to trafficking.

What does this mean for me?

- Look for opportunities to reduce waste always-reduce, reuse, recycle in that order!
- Think of the environment when travelling - can you use a video conference or telephone call instead?
- Familiarise yourself with the environmental laws, regulations and policies that apply to your role.
- Ensure that slavery and human trafficking are not occurring anywhere in our business, amongst our suppliers or our customers.

Where can I find out more?

- Please refer to your intranet and view:
- Supplier Code of Conduct

Insider Trading

The Corporations Act prohibits a person who is in possession of inside information from:

- dealing in TPG Telecom's shares;
- procuring another person to deal in TPG Telecom's shares; or
- directly or indirectly communicating Inside Information to others who they know, or ought to have known, would be likely to deal in TPG Telecom's shares.

We must act with the utmost integrity and not use our position for personal gain including trading in TPG Telecom shares with inside information.

Inside information is information that is not generally available and if that information were generally available a reasonable person would expect it to have a material effect on the price or value of TPG Telecom's shares. Inside information includes information that is not public and concerns the financial performance of TPG Telecom; a major acquisition or sale; an actual or proposed takeover or sale; entering into or terminating a material contract; an actual or proposed change to TPG Telecom's capital structure; a change in dividend or dividend policy; or a material claim or other unexpected liability.

If you are a director or a senior person at TPG Telecom who is more likely to have confidential information about the company, we apply even tighter rules to when you can buy or sell shares.

What does this mean for me?

- Read the Securities Trading Policy before buying or selling any TPG Telecom shares.
- Do not trade in TPG Telecom shares if you are in possession of any inside information related to TPG Telecom.

Where can I find out more?

Please refer to your intranet and view:

- Securities Trading Policy

TPG Telecom policies do not intend to be contractual in nature and TPG Telecom may amend, replace or withdraw its policies from time to time, in its sole discretion. Employees should read the policies in conjunction with their employment contract or any applicable industrial instrument (such as ITEA, AWA, collective agreement or award) and any applicable law.

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