



Anti-Bribery and Corruption Policy

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Author: Corporate Compliance
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1 Purpose

Corruption and bribery harm the community and have serious social and economic consequences. The most important anti-corruption provisions can be found in the Swiss Criminal Code (SCC). The Swiss Criminal Code and the relevant local provisions of other countries prohibit and sanction the offering, promising or granting of an advantage (favours, money, gifts, discounts, etc.) to Swiss or foreign public officials and private individuals as well as the acceptance of advantages from one of the aforementioned groups of persons. Even the mere offer of an advantage is considered a criminal offence – regardless of whether it is actually accepted or not.

Sunrise Communications AG (hereinafter referred to as Sunrise) is committed to consistent compliance with all legal requirements for the prevention and combatting of bribery and corruption. This policy advises employees about risks, sets out clear rules and ensures that bribery and corruption are prevented and actively combatted in all business areas. It supplements the Sunrise Code of Conduct.

Transactions that can only be concluded by granting unauthorised advantages must be avoided.

It is essential for all employees to understand and comply with this policy in order to avoid legal and financial risks to Sunrise, to maintain an ethical and fair working environment and not to jeopardise the reputation and long-term success of Sunrise. All employees are obliged to work actively against bribery and corruption and to report suspicious activities immediately.

2 Scope of application

This policy applies to all employees, members of the Executive Board and the Board of Directors of the Sunrise Group (hereinafter referred to as Sunrise), its subsidiaries and all those who deal with the topics regulated in this policy in the course of their work or who act on behalf of Sunrise. This policy is particularly important for those whose activities expose them to increased risk, such as employees in the areas of marketing, sponsorship, purchasing, etc. All business units are obliged to ensure the implementation of this policy in their organisational structure and processes. Additional instructions may be issued, but must not fall below the specified minimum standard. All employees are responsible for complying with this policy and for involving third parties in a compliant manner.

The guideline also applies to customers, suppliers and external partners. Stricter requirements from customers, suppliers or partners, which are laid down in contracts or internal directives, must also be complied with.

3 Avoidance of conflicts of interest / transparency requirement

Conflicts of interest arise when personal, professional or financial interests collide with duties to Sunrise. They can disrupt operational processes, impair professional behaviour, cause unjustified preferential treatment or lead to confidential information being passed on unlawfully. This can damage trust in decision-making processes, improperly influence business decisions, encourage unethical behaviour and damage the reputation of Sunrise. The procedure for dealing with conflicts of interest is explained in more detail below and illustrated with examples.

3.1 Personal conflicts of interest

These occur when personal relationships or interests influence objective perception or decision-making ability. They can have a negative impact on the working atmosphere or work performance and cause economic damage to Sunrise. Examples of personal relationships include: private friendships, family ties or intimate relationships.

Concrete application example:

- A manager orders the hiring of a related party without the necessary employment requirements being met (e.g. lack of qualifications).
- A shop manager hires a person close to him who will report directly to him.

It should always be ensured that the persons concerned are not involved in the recruitment or management of a related party. Furthermore, no influence may be exerted on the recruitment process, e.g., by offering consideration or threatening disadvantages.

Further details on these examples can be found in the guideline «Hiring of relatives».

3.2 Professional conflicts of interest

Professional conflicts of interest may arise if persons have other roles or responsibilities in addition to their function at Sunrise that might conflict with their duties at Sunrise.

Concrete application example:

- An IT employee becomes self-employed and develops IT solutions in order to market them privately. This might lead to a conflict of interest if technologies or ideas similar to those of Sunrise are used.
- A Finance employee is a member of the Board of Directors of a software development company that provides services for Sunrise.

In general, employees should not take on other activities or functions that might impair their ability to fulfil their duties for Sunrise independently or to make decisions in the best interests of the company.

Employees may not engage in any paid or unpaid secondary employment for the duration of their employment relationship if they thereby breach their fiduciary duty to Sunrise. Any competing activity is prohibited.

Unpaid secondary employment is not subject to authorisation, provided that it does not interfere with work performance and there is no risk that the employee might breach their fiduciary duty towards Sunrise.

Employees must obtain approval from Sunrise before commencing any paid secondary employment. Approval will be granted provided that no interests of Sunrise are harmed, work performance is not impaired and statutory working hours and rest periods are observed. See

also section 34 of the Collective Employment Contract and section 15.7 of the General Conditions of Employment.

3.3 Financial conflicts of interest

Financial conflicts of interest arise when financial benefits such as investments, gifts or job opportunities are promised that could influence a decision.

Concrete application example:

- An employee working in Procurement favours a supplier even though other suppliers are better or cheaper because he receives a considerable discount from the particular supplier for the private purchase of a computer.

Employees should withdraw from all decision-making processes that affect suppliers or other third parties if there is a personal interest or a close personal relationship with these persons.

All personal interests (private, professional and/or financial) must be clearly separated from the interests of Sunrise. Conflicts of interest must always be avoided. If conflicts of interest cannot be avoided, they must be disclosed to the line manager and documented in writing. The line manager, the Compliance department and, if appropriate, the People department will review the details and implement additional measures if necessary.

The Corporate Compliance Team (compliance@sunrise.net) is always available to answer any questions or uncertainties.

Please note: In the event of conflicts of interest, the interests of Sunrise always take precedence.

4 Granting and accepting benefits

Benefits such as gifts, invitations and other benefits must be made with a transparent and legitimate intention. This is usually the case if the gift is intended solely as a symbolic gesture of courtesy, gratitude or appreciation in a professional context. The business-related background of the gift, invitation or benefit should be clearly discernible.

4.1 Registration and authorisation matrix

Clearly defined value limits provide orientation. The following registration and authorisation matrix provides guidelines. In individual cases, it is not just the value, but also the reason, frequency and purpose of a donation that must be considered. Authorisation must therefore always be obtained from the Compliance department if the frequency and/or individual value as set out in the matrix is exceeded.

In principle, it is not permitted during negotiations and tender processes to accept or give gifts and invitations. Exceptions may be made only once Corporate Compliance has been consulted.

TYPE OF BENEFIT	FREQUENCY	SINGLE VALUE PER PERSON	AUTHORISATION OF SUPERIOR	AUTHORISATION COMPLIANCE
Gifts ¹	Occasionally	From CHF 50 to CHF 100	Yes	Yes
Invitation Coffee/lunch/ dinner	More than three (3) times per year and business partner	From CHF 150	Yes	Yes
Information event	More than three (3) times per year and business partner	From CHF 300	Yes	Yes
Social events	More than two (2) times per year and business partner	From CHF 200	Yes	Yes

Table 1: Registration and authorisation matrix

Further explanations can be found in the following chapters. If there is any uncertainty, the Corporate Compliance Team will be happy to offer advice.

4.2 Gifts & invitations

Sunrise allows gifts and invitations if (a) they are not intended to influence decisions, and (b) they do not violate applicable regulations and (c) they are within socially acceptable limits. Gifts and invitations may only be sent to the business address. Gifts with a maximum value of **CHF 50 per gift** are permitted without authorisation. Gifts with a value between CHF 50 to CHF 100 must be registered and authorised.

However, gifts with a value of over CHF 100 may neither be offered nor accepted and should always be politely declined. However, if a refusal is not possible and a gift is accepted, this must be reported to the Corporate Compliance Team (compliance@sunrise.net). The Corporate Compliance Team then checks what to do with the gift – e.g., whether it should be returned, donated or raffled off.

Invitations to business lunches or dinners are considered socially customary if they are appropriate and serve to maintain business relations. Without authorisation, up to three

¹ A ticket to an event that the host is not attending is more likely to be regarded as a gift. Gifts with a value of more than CHF 100 should therefore be politely declined.

invitations per year and business partner with a value of up to CHF 150 per event are permitted. Prior authorisation must be obtained from the Corporate Compliance Team for invitations that go beyond this (in number and/or value).

Invitations to information events or social occasions are governed by other guidelines (see below).

4.3 Information events

The main purpose of pure information events is to impart knowledge and transfer information. These are used to inform employees, customers or other stakeholders about new products, services or technologies in a targeted manner. Relevant content is conveyed in a compact and understandable way through lectures, presentations or discussion rounds. The transfer of knowledge and information thus also has a direct benefit for Sunrise.

Invitations to information events with a **market value of less than CHF 300** may be granted or accepted from private individuals and public officials if:

- The organisation of the event, including the location, is proportionate to the professional purpose.
- Smaller personal donations remain within the scope of these guidelines.

Travelling and accommodation expenses should not be accepted as part of the invitation. However, an exception may be made, for example, if the invited person is giving a lecture, a training course or a presentation.

Any assumption of costs or participation in costs by Sunrise for events organised by third parties must always be based on a contractual basis and strictly limited to the business context.

4.4 Social events

Social events (e.g. concerts, sports, film and theatre events) are events that serve the purpose of social interaction and entertainment. In principle, the following applies: invitations to social events may be accepted or offered if the following conditions are met:

- The invitation has a market value of less than **CHF 200** per person.
- No more than two invitations per business partner per year.

If the market value exceeds the aforementioned threshold or if invitations are to be granted to public officials, authorisation must be obtained from the Corporate Compliance Team (compliance@sunrise.net).

4.5 Socially customary and appropriate allowances/benefits

The following table (Table 2) provides an illustrative, non-exhaustive overview of the types of gifts and invitations that are considered socially customary and appropriate in a business context. It also explains the basis on which such benefits are categorised as acceptable.



Category	Classification	Example 1	Plausibility & basis for decision-making
Gift	Small, non-personalised promotional gifts	Pens, calendars, flowers, chocolate	Symbolic gesture, no influence on decisions, clear business context, low value, no consideration expected
Invitation	Invitations to coffee, simple and appropriate business lunch	Coffee, business lunch	Business-relationship maintenance, appropriate business context, low value
Invitation	Invitations to dinner	Business dinner in a standard restaurant	Business-relationship maintenance, appropriate business context
Invitation	Events with an exclusively business character	Product presentation, information event, e.g.: <ul style="list-style-type: none"> - Global Cyber Conference, - Swiss Telco Summit 	Business purpose, no private component

Table 2: Socially customary and appropriate allowances/benefits

Please note: Even small donations may be criminal if they are made regularly and with the intention to bribe.

4.6 Critical benefits/advantages

The following table (Table 3) provides an illustrative, non-exhaustive overview of various types of invitations and gifts that should be categorised as critical in a business environment. In principle, the less business-related the benefit is, the more it should be refused. Benefits during critical periods (e.g., during ongoing contract negotiations) or gifts and invitations for private companions are also problematic.

If in doubt, always consult the Corporate Compliance Team and do not accept or offer any critical benefits without prior authorisation. This ensures that all decisions are made in accordance with company guidelines and legal requirements.



Category	Classification	Example 1	Plausibility & basis for decision-making
Invitation	Social occasions/events	Concert, sporting event e.g., invitation to ESAF, Open Air Frauenfeld, golf tournament	Critical, as personal in nature
Invitation	Events with private accompaniment	Invitation incl. partner	Increased risk, potentially unauthorised, personal component
Invitation	Travelling or accommodation costs	Hotel, flight (excluding private or leisure expenses)	Risk of granting benefits, transparency, justification (e.g., giving a presentation) and documentation mandatory
Invitation/gift	Incentives	Incentives that are financed or co-financed by third parties, e.g.: <ul style="list-style-type: none"> - Samsung incentive trip - Apple champion programme 	Risk of granting advantages, transparency and documentation absolutely necessary Prizes are to be addressed to Sunrise and not to individual employees personally

Table 3: Critical benefits/advantages

4.7 Prohibited benefits/advantages

There are benefits and advantages that are **never permitted** and may neither be accepted nor offered. The following table (Table 4) provides an illustrative, non-exhaustive guide as to which benefits are prohibited and why.

This also includes gifts and invitations that violate applicable laws or are considered offensive. Such benefits and advantages must always be politely declined. Immediate involvement of the Corporate Compliance Team is essential to protect both Sunrise and the person.



Category	Classification	Example 1	Plausibility & basis for decision-making
Bribes	Explicitly prohibited	Employee pays money to a supplier to speed up the bureaucratic process of onboarding	Bribes fall under the offence of granting and accepting benefits (StGB) and are prohibited.
Gift/ invitation/ allowance	Explicitly prohibited benefits	Money, vouchers, shares, cryptocurrency, luxury gifts, exclusive invitations, expensive food, luxury hotel, casino	Violation of law or guidelines, risk of corruption / criminal offence
Gift/ allowance	Benefits with influence on decisions	"Feeding" the business partner in order to influence an imminent/future decision to one's own advantage, e.g., by the use of a licence free of charge as part of a proof of concept	Clear risk of corruption, criminal offence
Gift/ allowance	Non-transparent benefits	Shipping to private address	Transparency requirement violated
Gift/ invitation	Advantage requested by the other party	Gift in return for order	Clear corruption, criminal offence
Allowance	Personal expenses of the invitees	Expenses for private expenditure	No business relevance
Gift	Gift during the tender/negotiation process	Gift during ongoing tender or negotiation	Prohibited, risk of influence
Invitation	Inappropriate / sexually orientated invitation	Invitation to the red-light district	Damage to reputation, risk of influence

Table 4: Prohibited benefits/advantages

5 Donations and sponsoring

Sponsoring contributions, donations or similar financial contributions for legitimate purposes in the interest of Sunrise are permitted, provided that: (a) they are not provided with the intention or appearance of influencing any action, omission or decision of the recipient or a third party; and (b) they comply with internal company policies.

All sponsorship contributions, donations or similar financial contributions must be recorded in writing (e.g., in a contract) in order to ensure clarity and transparency.

Donations and sponsorship in a political context are particularly sensitive and require **explicit prior approval from the General Counsel** as they could be construed as political support.

Financial support for political parties or candidates is prohibited.

6 Expenses

Expenses are costs incurred by employees in the performance of their professional activities in the interest of Sunrise. Costs that are not necessary for the performance of the work are not considered expenses. Only costs incurred for business, verifiable and reasonable expenses will be reimbursed. They may not be used to conceal or grant hidden advantages.

Examples of hidden advantages (not exhaustive):

- Private meals declared as business entertainment
- Submitting falsified or duplicated receipts
- Fictitious expenses for "alleged" services
- Hotel bills with private expenses such as wellness, which are declared as business-travel expenses
- Use of company credit cards for private purposes under the guise of business expenses

Any form of concealed benefits or other advantages to employees or third parties is prohibited.

7 Training and awareness

Sunrise offers mandatory e-learning on the Anti-Bribery and Corruption Policy. The e-learning provides information on risks, regulations and corporate obligations. In addition, further ad hoc training can be carried out based on a risk-based approach for particularly affected business areas.

8 Reporting of offences

Violations of this policy or suspected cases must be reported immediately to the Corporate Compliance Team (compliance@sunrise.net). A report can also be made anonymously via the Compliance Portal (whistleblower procedure for employees and external stakeholders).

The established procedure provides for the reports to be analysed comprehensively and the necessary steps to be initiated. Sunrise does not permit retaliation against employees who seek advice in good faith or report unlawful or unethical behaviour. Deliberate false reports will also not be accepted and may lead to disciplinary action.

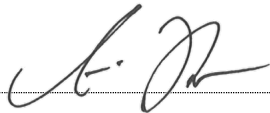
9 Sanctions

Violations of this policy will result in disciplinary action and may have consequences under labour and/or criminal law.

10 Entry into force

This directive comes into force on 1 February 2026 and replaces the previous Anti-Corruption Directive and Gifts and Hospitality Directive.

Glattpark, 13 January 2026



André Krause
CEO



Marcel Huber
General Counsel & Chief CA Officer

Version	Date:	Author	Amendment
1.0	13/01/2026	Andreas Meier / Pjeter Vilaj	Formal consolidation and content update of existing guidelines

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