

**VANTAGE
TOWERS**

This document
is currently
under review

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Code of Conduct

Our commitment to doing what's right



A Message from the Management Board

At Vantage Towers, we are at the heart of Europe's digital transformation by providing the tower infrastructure and enabling the connectivity that allows access to digital networks for people, communities, and businesses. Since our launch in 2020, we have established a growing portfolio of around 88,000 sites across 10 countries and a thriving team. Together, we are driven by the conviction that we not only provide telecommunications infrastructure but also lay the foundation for a better-connected society.

The world is evolving, and so are we.

Looking ahead, the tower business remains a cornerstone of the ongoing digital transformation. The demand for resilient, high-capacity networks continues to grow, fueled by 5G, the Internet of Things (IoT), and other emerging technologies that are redefining the way people interact, and businesses operate. As we expand our infrastructure and embrace these innovations, we remain committed to our mission of providing the infrastructure for seamless connectivity that enables businesses, communities, and societies to thrive in an increasingly connected world.

Every site we deploy plays an important role in bridging the gap between urban and rural areas, ensuring that the digital future is accessible to all. We also strive to make this future more sustainable by operating our infrastructure with 100% renewable energy. As Neutral Host, efficiency is at the core of our business model: by enabling as many Mobile Network Operators, IoT companies or utilities to share our sites, we reduce environmental impact while enhancing coverage.

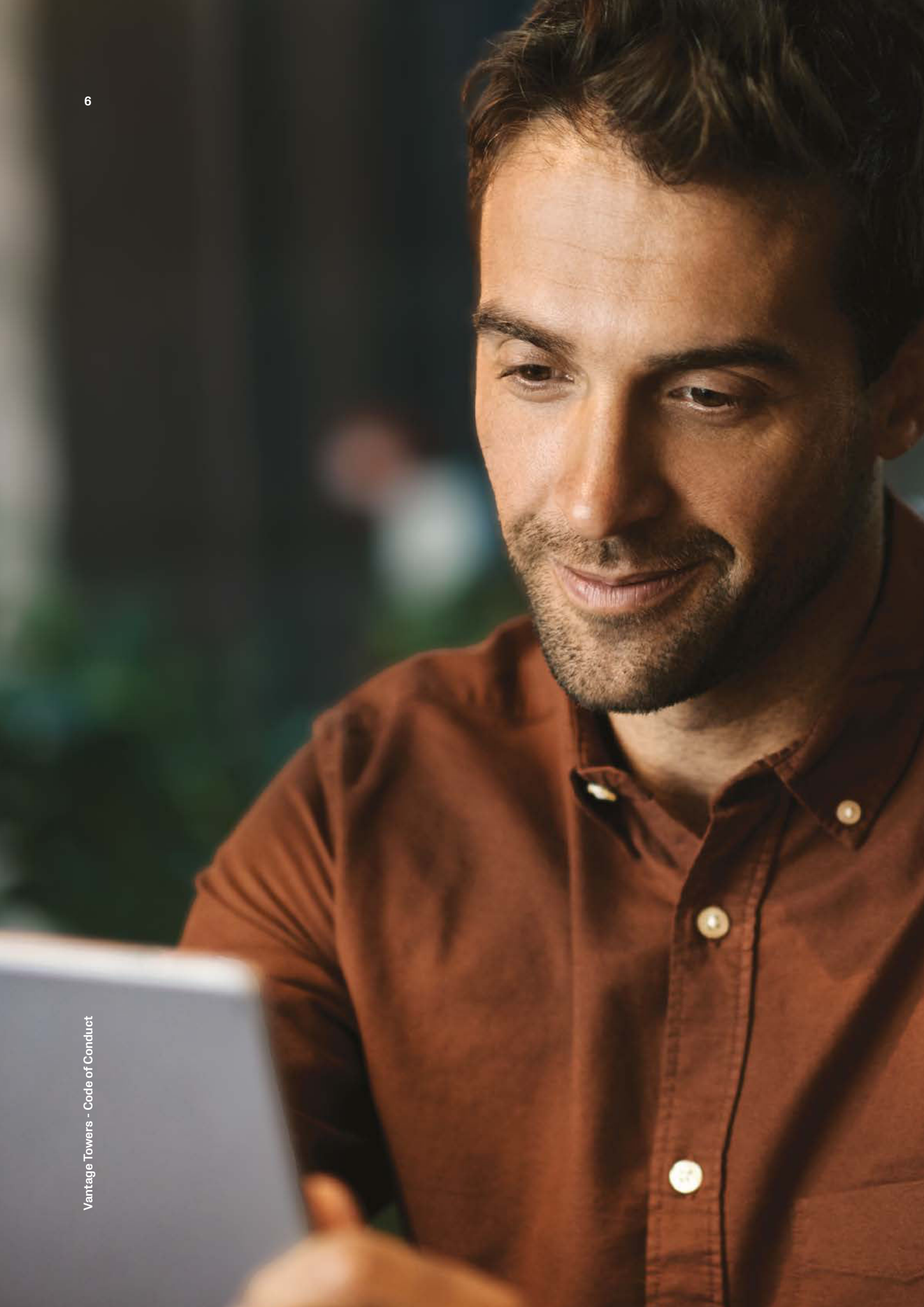
Our company values guide us in everything we do: Accountability, Respect, Teamwork and Honest. Accountability drives us to fulfil our commitments and take collective responsibility for our success. Respect promotes inclusion, equality and open communication. Teamwork fosters authentic collaboration, empathy and an environment that values feedback as part of our #OneVT culture. Honesty strengthens our strong relationships with our colleagues, partners and customers. These values shape our culture that aims to ensure that we always act with integrity and purpose.

As we pursue our ambitious goals, we follow the highest standards across our whole organization. This Code of Conduct reflects our commitment to ethical and responsible behavior for the benefit of our team, our esteemed partners and the communities we serve.

As we continue to build and innovate, we are looking forward to creating opportunities, advancing sustainable technologies, and making a lasting impact on society.

Together, we are powering Europe's digital transformation.

On behalf of the Management Team



Doing what's right

Our Code of Conduct helps us do what's right. It expresses our values – what we stand for – and the principles that govern how we interact with the world around us.

At Vantage Towers, we commit to excellence in all that we do – from the office to the tower site, we accept nothing less than the very best. This means that we need to act with integrity in all situations.

All Vantage Towers employees are expected to follow the Code of Conduct. It is there to help us in situations for which there are no clear rules, or in which the rules can be interpreted in different ways. If you have any questions about our Code of Conduct or need further help, please refer to your respective line manager, the Compliance and Integrity Team, or the HR Team.



These pages are currently being updated. In the meantime, you can explore and get familiar with our new values by following this link: [Our Values Handbook](#)

Our value compass

At Vantage Towers, our values of honesty, accountability, respect and teamwork drive our mission to power Europe's digital transformation. We derive our principles from our values, bringing them to life by the actions we take every day.

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[Our Values Handbook](#)

Our values and principles come together in our value compass. By following our compass, we'll be able to make the right decisions – even when the right decisions may not be obvious.

Our value compass

Honesty

Continuous improvement and customer trust

Teamwork

Collaborate in a multicultural environment

Accountability

Taking ownership and being accountable

Respect

Humanity as the centre of our actions

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[Our Values Handbook](#)

Why are these values and principles relevant to us?

We have developed our value compass to give us a framework for action. It represents our ethical blueprint for how we engage with each other and our surroundings and serves as an enabler for our business. By following our value compass, we will be able to bring our culture to life and power ourselves into our work with integrity.

We believe that:

Together, we can embody a culture based on humanity and integrity.

Our core values, honesty, accountability, respect and teamwork must form the ethical basis for our actions so that we are able to achieve our goals.

Acting responsibly and taking ownership is always worth it.

Building trust and showing an appreciation for others is non-negotiable.

It is our duty as a team to be role models for each other.

How do we bring our values and principles to life?

Our value compass provides us with series of questions we can use to reflect upon our actions. It is our responsibility to apply our value compass to our commitments and challenge the way we interact with each other and our surroundings.

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Honesty

Continuous improvement and customer trust

Am I acting with clear intent?

We are respectfully honest as honesty is the basis for trust.

We are fair to each other.

We rely on each other.

Am I speaking up?

We intervene quickly when someone isn't doing what's right.

We have the courage to speak up.

We argue based on facts and dare to freely express our opinions.

Am I building trusted customer relationships?

We build sustainable, long-term customer relationships.

We strive to exceed customer expectations.

We provide excellent products and services.

We actively help our customers succeed.

**Am I taking responsibility
for my actions?**

We are responsible for our work and results.

We take ownership of our successes and our mistakes.

**Am I treating others as
I would like to be treated?**

We keep our word.

We have a “doing what’s right” mentality.

We empower others.

Am I open to change?

We always look for new approaches.

We are ambitious and are always trying to improve.

We always keep our goals in mind.

We are eager to take up challenges.

We simplify processes and structures.

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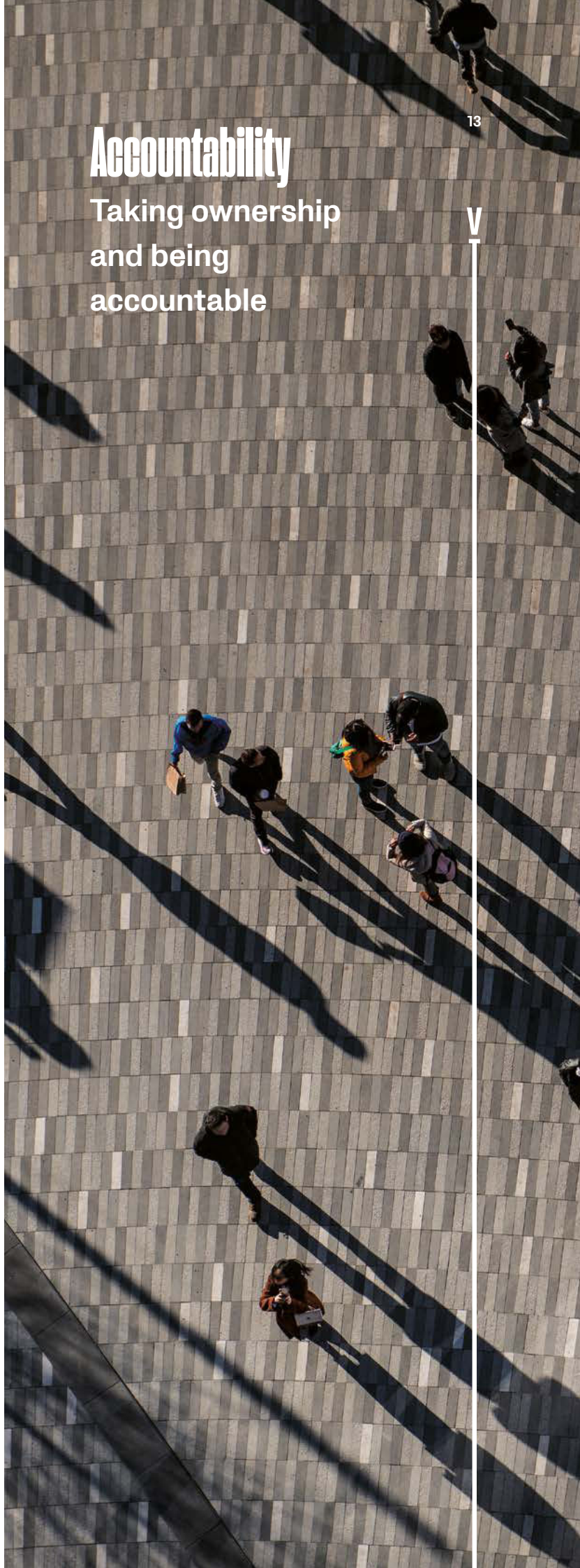
[Our Values Handbook](#)

Accountability

Taking ownership
and being
accountable

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Respect

Humanity as
the centre of
our actions

Am I actively listening to others?

We are open-minded.

We consider other perspectives.

We respect the opinions of others.

Am I valuing others?

We celebrate our differences.

We strengthen diversity.

We are polite to each other.

We are challenging but realistic.

We respond to enquiries in
a timely manner.

Am I willing to be a team player?

We help each other.

We celebrate each other and our successes.

We win as a team, not as individuals.

We collaborate by being supportive.

We adapt to cultural differences.

We seek solutions across functions and markets.

We proactively reach out to colleagues.

Am I open to learn?

We provide and are open to receiving constructive feedback.

We share knowledge openly.

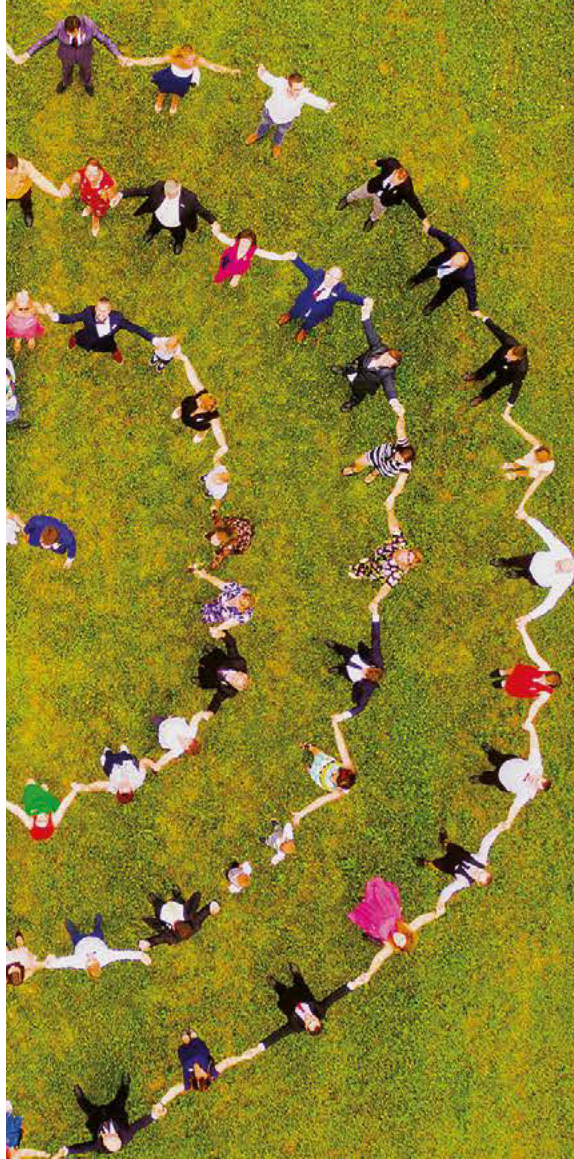
We are agile and adapt fast.

We manage mistakes openly, handling them as experiences to learn from.

We are open to developing best practices.

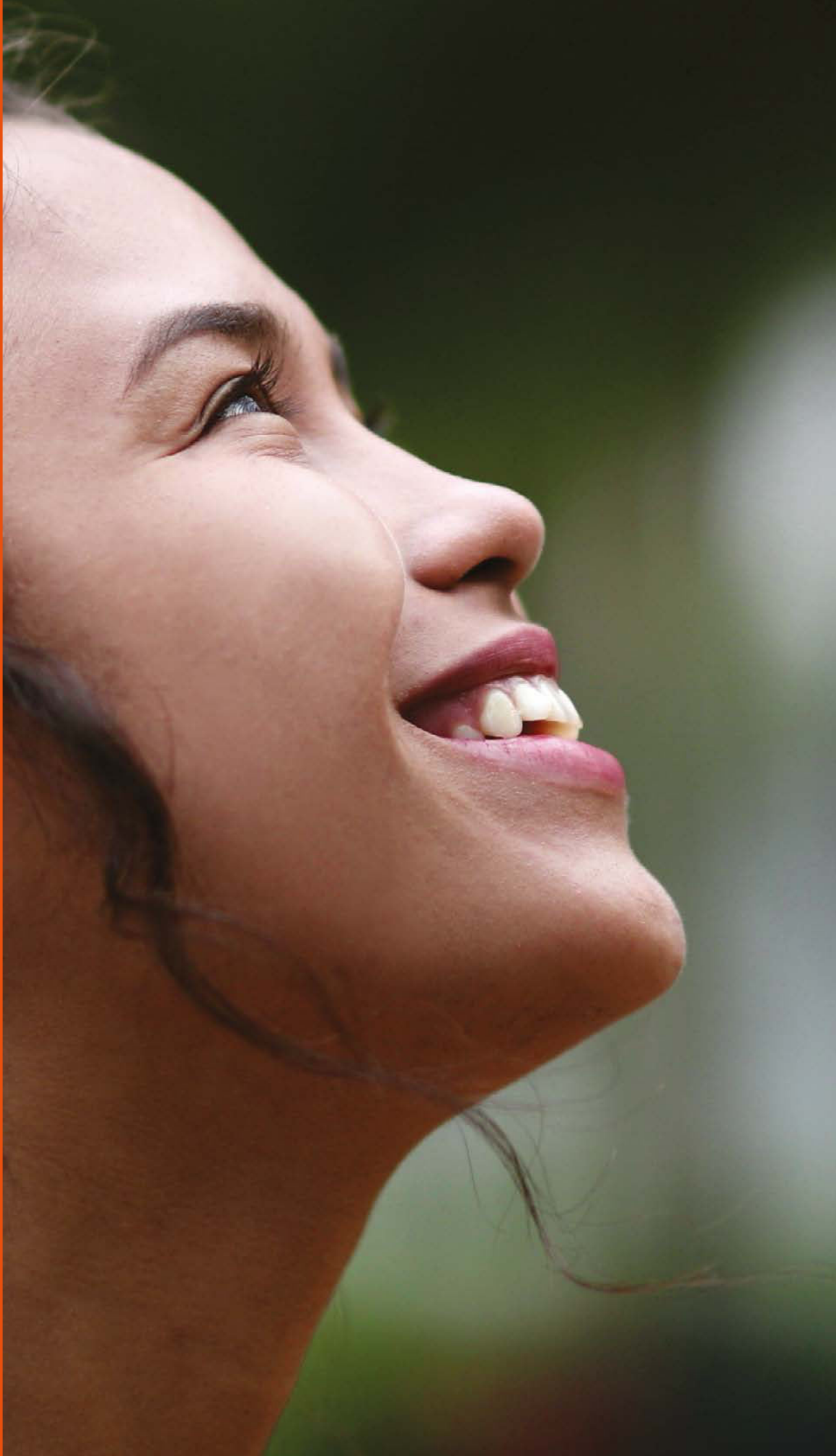
Teamwork

Collaborate in a multicultural environment



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Our commitments

Our commitments are very important – they support our business, the work we do, and help us navigate the challenges we encounter.



The commitments outline the behaviours and standards we expect from ourselves and the people we work with. By applying our value compass to our commitments, we'll be able to bring them to life and find the support we need to make the right decisions.

All commitments are embedded into our three strategic pillars: People, Planet, and Performance to guide us on our mission to power a sustainable digital Europe. Furthermore, our ESG considerations intertwine with our commitments to give us operational targets to work towards.

For a thorough understanding of our commitments, please read through the respective policies in our [Vantage Towers Global Policy Portal](#). There you will find precise guidelines you can follow for all situations.

As an expert employee, there may be additional policies or principles that apply to your role or market. Please check with your local compliance officer and ensure you are aware of any local responsibilities you may have.

People

Diversity and inclusion
Female empowerment
Health and safety
Human rights
Our way of working together
Representing Vantage Towers and using social media
Social ("S" of ESG)
Volunteering
Work-life balance
Working with employee representatives

Planet

Environmental protection and sustainability ("E" of ESG)
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Performance

Anti-bribery
Business resilience
Conflicts of interest
Cyber security
Data protection
Dealing with risks
Dealing with suppliers
Economic sanctions and trade compliance
Fair competition
Financial integrity
Governance ("G" of ESG)
Insider dealing
Protection of assets
Responsible lobbying





DIVERSITY AND INCLUSION

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OUR COMMITMENT

We pursue equality of opportunity and inclusion for all employees by recognising and celebrating diversity. We are committed to creating a work environment that treats all employees with appreciation and dignity. We base all our relationships on respect for individuals and their human rights. We do not tolerate any form of **discrimination***.

WHY IT MATTERS

Creating a work environment open to people of any age, religion, sexuality, culture, gender, or language helps us bring together a mix of personalities and skills that generates great ideas, drives innovation, and builds great stakeholder relationships.

*See the glossary for definitions of highlighted terms.

FEMALE EMPOWERMENT

OUR COMMITMENT

We're committed to promoting equal rights and opportunities for both men and women and are dedicated to the empowerment of female employees. We therefore strive for a living wage, aim to enable women to thrive in the workplace, and help them reach their full potential.

WHY IT MATTERS

We strive to create working conditions that encourage women to apply for leadership positions, such as enabling flexible working times, home office capabilities, childcare, and other types of support. We want our employees to support others to grow and work in ways that bring out their best, and this includes women.





HEALTH AND SAFETY

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V

OUR COMMITMENT

We protect the health, safety, and wellbeing of all people connected with us – our employees, customers, partners, and people who live in the communities in which we operate. Keeping people safe is one of our most fundamental responsibilities.

WHY IT MATTERS

We understand that health, safety, and wellbeing are the most important assets we must protect. Being healthy and safe is key to living a fulfilling life – we therefore take safety extremely seriously as a company.

Our commitment to safety does not differentiate between our own employees and others, such as our tenants or the employees of our **contractors** or **suppliers**. Our Absolute Rules for Safety are a key priority and are embedded in everything we do. We comply with all international and local regulations and ensure transparency when communicating with our stakeholders.

HUMAN RIGHTS

OUR COMMITMENT

We ensure business practices where everybody is treated with dignity and respect. We do not tolerate any form of **discrimination**. We declare our total rejection of child labour; we protect people from abuse by those who are more powerful. We seek ways to honour the principles of internationally recognised human rights, even when faced with conflicting requirements.

WHY IT MATTERS

We stand for universal human rights and freedom. We therefore recognise and enable the exercise of in-depth employee rights, such as the freedom of association, collective bargaining, as well as fair and equal working conditions and wages. For us, respecting human rights is not only an obligation, but a chance to change lives. We firmly believe that everyone should have the right to freedom of opinion, expression, and employer selection.





OUR WAY OF WORKING TOGETHER

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OUR COMMITMENT

We create a work environment where all employees feel safe, supported, and have the equal opportunity to evolve and succeed. We do not tolerate inappropriate behaviour, including **harassment**, **bullying**, or abuse of authority. We appreciate the opinions of all employees, encourage them to raise concerns, and to express themselves openly in a respectful way.

WHY IT MATTERS

Creating a safe work environment fosters a culture of open-mindedness, curiosity, and growth. Treating each other in a fair and respectful manner benefits all employees and contributes to building a society based on respect for human rights.

REPRESENTING VANTAGE TOWERS AND USING SOCIAL MEDIA

OUR COMMITMENT

We are committed to communicating openly and transparently with our stakeholders within the bounds of commercial confidentiality. We protect confidential information and seek appropriate approval when speaking on behalf of Vantage Towers. We use social media in a professional way when representing Vantage Towers.

WHY IT MATTERS

We all serve as ambassadors for our company and brand. By conducting ourselves in a way that fosters integrity and trust, we will be better positioned to reach our goals. We are aware that whatever we do and say in public represents the company.





SOCIAL ("S" OF ESG)

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OUR COMMITMENT

We have a responsibility to our employees and to society. This means we take all issues that impact people seriously, including – but not limited to – protecting human rights, promoting diversity and inclusivity, operational transparency, and developing human-centric ways of working. We work to minimise harm for all people connected with us – employees, customers, partners, and people who live in the communities in which we operate.

We commit to reach our social sustainability targets and will act in accordance with the relevant laws, regulations, guidelines, values, and principles to achieve them.

WHY IT MATTERS

By being honest and responsible, we can have a positive impact on the lives of the people who live within the communities where we operate. By taking society's concerns and questions seriously – for example, regarding health and safety, we will ensure we make the right choices. To transform communities and empower individuals, we must act with integrity.

VOLUNTEERING

OUR COMMITMENT

We support our employees if they wish to volunteer. We strongly expect that our employees do not engage with political institutions or organisations that do not support the values and principles held by our company. We especially do not support organisations that oppose our democratic and legal rights.

WHY IT MATTERS

We take our responsibility to society seriously. We support and encourage our employees to volunteer in activities that contribute positively to society. We do so regardless of whether those activities are in support of institutions, social projects, environmental concerns, or charitable giving.





WORK-LIFE BALANCE

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OUR COMMITMENT

We provide an environment where our employees can find a work-life balance that fits their life plan. We believe the foundation for such an environment is good communication, mutual trust, and respect. We respect and support each other's free time and personal lives. To do this, we offer various types of support across life's various stages.

WHY IT MATTERS

We are all unique individuals, each with our own life stories, motivations, and passions. We define work-life balance as the equilibrium between our work and our private lives. A healthy work-life balance helps foster well-being and personal development for our employees, and provides the foundation for social responsibility, organisational performance, and growth.

WORKING WITH EMPLOYEE REPRESENTATIVES

OUR COMMITMENT

We aim for constructive collaboration with employee representatives. We work with all employees, employee representatives, and unions in a respectful and trustworthy way.

WHY IT MATTERS

We are committed to our social responsibilities. We strive to achieve a fair balance between the economic interests of the company and the interests of our employees. Even in cases of conflict, our common goal will be to nurture a firm foundation for constructive collaboration. Collaboration with employee representatives is always based on the relevant collective agreements and legal regulations.





ENVIRONMENTAL PROTECTION AND SUSTAINABILITY ("E" OF ESG)

OUR COMMITMENT

We commit to protecting the environment and our planet. Wherever possible, we will reduce our use of resources and cut any harmful emissions for which we are responsible. We invest in energy efficiency measures and technologies to mitigate the effects of climate change and reduce, reuse, and recycle all equipment to reduce waste.

We commit to reaching our environmental sustainability targets and will act in accordance with the relevant laws, regulations, guidelines, values, and principles to achieve them.

WHY IT MATTERS

Our planet and its people deserve to be treated with respect. This is one of our most important business priorities and is central to our strategy of providing Europe with sustainable, green connectivity.



Performance

ANTI-BRIBERY

OUR COMMITMENT

We do not give, accept, offer, promise, request, or agree to any **bribes**, nor do we participate in any corrupt practices. We respect international anti-corruption standards and conduct our business ethically, lawfully, and responsibly with public and private actors.

We have zero tolerance towards **bribery** in any form by any party. Our business and successes are driven and determined by the quality of our products and services, not through undue or improper influence.

WHY IT MATTERS

In a civilised world, business success should be the result of sincere work, fairness, and ethically responsible motivations. Acting with honesty and integrity fosters trust in our organisation, enhances fair competition, and serves the public good.





OUR COMMITMENT

We ensure a consistent, reliable, and resilient distribution of our services. In crisis or disaster situations, our business can be considered an essential – or even vital – service for many people. We therefore think of any possible scenarios that could have a negative impact on the provision of our services and do whatever it takes to avoid them. We continuously improve our process chains to minimise the impact of disruptive events.

WHY IT MATTERS

Today, the provision of functional passive infrastructure is a service that must be available 24/7 at a consistent quality. Industry customers, private consumers, public institutions, and emergency services all depend on ever-faster, higher-quality mobile connections.

Unforeseeable events – even the absence of key employees – can slow down or hinder the delivery of our services. Our tenants trust us based on the promise that our sites are operational. We therefore need to take all reasonable preventive measures to ensure the continuity of our business, including during crisis or emergency situations.

CONFLICTS OF INTEREST

OUR COMMITMENT

We respect our employees' private lives and carefully weigh our personal interests against our interests as a company. In return, we expect our employees to ensure that their private interests – as well as **sideline activities** – do not come into conflict with or influence business decisions. We disclose and manage potential and existing **conflicts of interest** properly.

WHY IT MATTERS

Resolving and avoiding **conflicts of interest** allows us to establish and maintain trustful, confident partnerships. We strive to make decisions in the best interests of Vantage Towers.





CYBER SECURITY

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OUR COMMITMENT

When it comes to security, we all play a role. We classify our documents and emails with the right classification (C1, C2, C3, C4). We encrypt **sensitive information** before sharing with those who need access to it. We are aware of **social engineering** attempts, such as **phishing**, and know how to respond to them.

WHY IT MATTERS

Our customers and shareholders count on us to deliver secure and reliable tower infrastructure services. Furthermore, our customers and landlords have entrusted us with their information. It is our duty to proactively protect that information from falling into the wrong hands and to safeguard the systems that hold it.

DATA PROTECTION

OUR COMMITMENT

We keep personal data confidential. We process and use personal data only in a responsible way and to the extent permitted by the General Data Protection Regulation (GDPR) and its privacy principles, while firmly respecting the data subjects' rights.

WHY IT MATTERS

The protection of personal data plays an important role in our digitised world. We understand that personal data is information that can be traced to an individual. It is personal information about a human being and should be treated with utmost care and respect.





DEALING WITH RISKS

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OUR COMMITMENT

We are committed to building a strong, resilient, and risk-oriented organisation. We take the responsibility to be aware of, understand, and take a holistic view of the **risks** we take – while enhancing the company's value by utilising available opportunities.

WHY IT MATTERS

Our aim is to establish a culture with a strong sense of risk awareness and ownership; where we all act as risk managers who consciously take risks and explore opportunities. By acting this way, we will master our challenges and exploit future opportunities in line with our business' **risk appetite**, as well as social and environmental responsibilities.

DEALING WITH SUPPLIERS

OUR COMMITMENT

We commit to following our **Code of Ethical Purchasing** in all **procurement** activities. Our aim is to responsibly manage the wider impact our business has on communities, society, and the environment. We select **suppliers** best suited for our business and society based on objective criteria, such as their competence, integrity, and other merits aligned with our business. Throughout our relationship, we encourage our **suppliers** to uphold the same standards we do.

WHY IT MATTERS

We know that the success of our business depends on strong, reliable relationships with trustful **suppliers**. Ensuring that our company and our **suppliers** adhere to the same strong ethical and operational standards means that our customers – and society at large, will obtain the most benefit from our infrastructure.





ECONOMIC SANCTIONS AND TRADE COMPLIANCE

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V

OUR COMMITMENT

We comply with **sanctions** laws and their **restrictions**, as well as all customs regulations and export controls as applicable to us. We commit to select our **suppliers**, other business partners and products based on objective criteria, and do not engage with people, companies, countries, or regions that have been placed by governments on sanctions lists.

WHY IT MATTERS

Sanctions serve to prevent threats to international peace and security or to resolve them. Complying with sanctions laws is crucial to supporting and upholding international peace and security. Respecting trade laws allows us to expand and deepen our business relationships whilst building trust in our business and enhancing fair and free trade worldwide.

FAIR COMPETITION

OUR COMMITMENT

We believe in free and fair competition based on our performance and the quality of our products and services. We will not engage in agreements or conduct that unlawfully prevents or restricts competition. We want to be known and respected as fair competitors who act in compliance with antitrust laws in our markets.

WHY IT MATTERS

Free and fair competition is one of the fundamental pillars of our economic system and society. Only a fair, competitive marketplace drives innovation and allows us to power Europe's digital transformation.





FINANCIAL INTEGRITY

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V

OUR COMMITMENT

We provide the best possible return for our shareholders over the long term. We provide them with transparent, precise, timely, and concrete financial information. Our investment decisions, acquisitions, and business relationships are based on both economic criteria and social and environmental considerations. From a holistic perspective, we strive to find the best value when spending company money.

WHY IT MATTERS

Financial integrity is very important to our business. We are all responsible for making sure that money is well spent and that financial records are kept accurate and complete. We follow the Vantage Towers governance policies and agreed processes, and ensure we comply with all relevant financial reporting and accounting standards and regulations.

GOVERNANCE ("G" OF ESG)

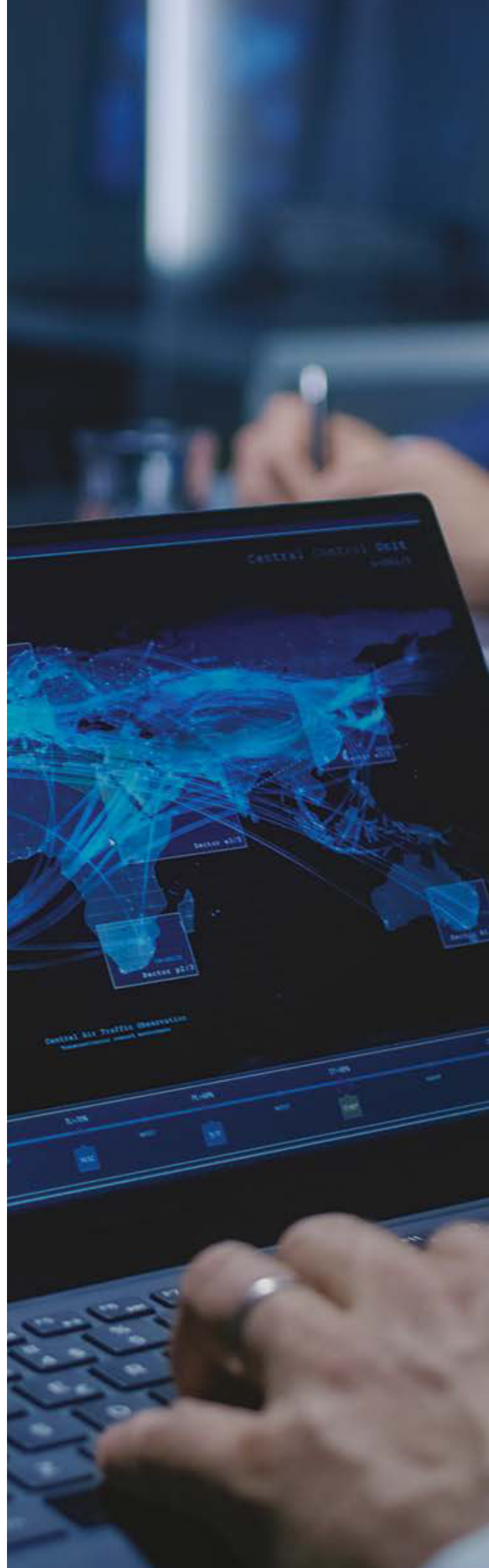
OUR COMMITMENT

We commit to taking all appropriate measures to make effective, ethical, and compliant decisions. Our governance structure is balanced and robust by design. Our experienced leadership team and independent supervisory board are entrusted with ensuring we always maintain the highest standards of corporate governance. We're also committed to operating a sustainable supply chain and energy purchasing framework. We source products, services, and utilities in a sustainable manner.

We commit to reaching our sustainable governance targets and will act in accordance with the relevant laws, regulations, guidelines, values, and principles to achieve them.

WHY IT MATTERS

Good, robust governance is essential to the success and integrity of our organisation. It leads to ethical business practices and demonstrates our respect for each other, our customers, shareholders, society, and the environment.





INSIDER DEALING

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OUR COMMITMENT

We do not engage in insider dealing. This means we do not buy or sell Vantage Towers' shares or securities by misusing insider information that we have access to due to our position or business relationships within Vantage Towers. We also do not disclose **inside information** unlawfully to third parties, such as potential investors, journalists, consultants, bankers, customers, family members, or friends.

WHY IT MATTERS

We aim to do business with the highest standard of integrity and legality. To build trusting relationships with our stakeholders, we do not use **inside information** for personal gain, or provide it to potential investors as it would create unbalanced and unfair conditions for those participating in the investment playground.

PROTECTION OF ASSETS

OUR COMMITMENT

We act to secure the tangible and intangible assets of our company, our **suppliers**, and our customers. A holistic understanding of security is intentionally implemented within each of our processes.

We believe that security is never an inhibitor for business, but always an enabler. Although we are aware that security measures in the short term may create extra costs or workload, we accept this, knowing that only a company that takes security seriously can be profitable and sustain its business.

WHY IT MATTERS

Without appropriate security, we accept a lot of potential **risks**. In the information age, security responsibilities cannot be assigned to a single person or department. Security starts with each of us and is essential to our mission – it also helps us maintain our high market and brand reputation. We believe our employees are our strongest security asset.





RESPONSIBLE LOBBYING

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OUR COMMITMENT

We act in a responsible, truthful, transparent and respectful way when representing our interests with public authorities and lawmakers. We will maintain an open and transparent political dialogue with all relevant institutional and societal stakeholders. We will register our interest wherever possible. Our engagements will always be guided by facts.

WHY IT MATTERS

The outcome of democratic decision-making processes must benefit society at large and serve the public interest. Corporations should exercise the right to represent their interest in a responsible way.



Our responsibilities

As Vantage Towers employees, it is our responsibility to adhere to the Code of Conduct. Following it is central to who we are and how we act.

APPLICABILITY

This Code of Conduct applies to all Vantage Towers employees. All commitments in this Code of Conduct are based on our values and principles on which we have decided together.

It is up to every single one of us to bring our values and principles to life. We all need to take personal responsibility to adhere to our commitments, policies, guidelines, and laws.

In situations where different interpretations could be drawn from these documents or in case of uncertainty, we seek advice from our line manager, the Compliance and Integrity Team, or the HR Team.

LEADERSHIP

Responsible conduct requires self-awareness. We expect our managers at all levels to lead by example and live and breathe this Code of Conduct in everything they do – for themselves – and as role models for our employees.

We are all committed to excellent performance. Our managers always ensure that we try to win – not by any means necessary – but within the ethical framework outlined by our Code of Conduct. This is how we inspire and enable our team members to think and act responsibly. Managers appreciate and celebrate employees, and promote a culture of accountability, honesty, respectful interaction, and team spirit.

SPEAK UP AND WHISTLEBLOWING

We uphold a culture of learning and open-mindedness where we are all individually responsible for our actions. We strive to do the right thing and be fair to each other regardless of the circumstances. If we notice misconduct or possible violations of our Code of Conduct, policies, or laws, we do not hesitate to speak up.

We take each whistleblowing report made in good faith very seriously and protect whistleblowers and other parties involved in any investigation against dismissal, reprisal, or any other form of discrimination. At the same time, we ensure the highest level of confidentiality in any event. If applicable local law provides the whistleblower with the right to decide whether to report anonymously or by name, we will ensure that such rights are safeguarded.

We strive to give our best. We strive for a healthy organisational culture based on trust. Therefore, it is important to minimise any disruptive factors. Violations of rules, regulations, policies, and the law can lead to enormous financial losses and reputational damages – including fines imposed on us or our employees. Detecting violations in a timely manner is in everyone's interest, as it safeguards us and our organisation from suffering harm.

We encourage everyone to confidentially report any substantiated



suspicion or evidence of assumed violations by contacting your line manager, our HR Director, the Compliance and Integrity Team, or by using our [Vantage Towers Speak Up tool](#).

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SUPPORT AND ASSISTANCE

This Code of Conduct cannot and does not aim to address all questions and situations that may arise. Please visit our [Global Policy Portal](#) and our [Compliance and Integrity SharePoint](#) for further information, guidance, and access to all Vantage Towers policies. Please contact our Compliance and Integrity Team any time you need further support at compliance@vantage-towers.com.

APPROVAL

This Code of Conduct replaces our former Code of Conduct and was approved by our Vantage Towers AG Board members as well as by our works council on 3 December 2021. It applies to all employees of Vantage Towers AG and all its subsidiaries in which Vantage Towers AG holds a direct or indirect interest of more than 50%, or management control.



Glossary

Bribe / Bribery	A bribe involves the giving or receiving of cash, or anything else of value, to get someone to act 'improperly' (usually resulting in an unfair personal gain). Nothing of value needs to change hands, just the offer or promise is enough to break the law.
Code of Ethical Purchasing	The policy we abide by to ensure that we purchase in an ethically compliant manner and adhere to the Vantage Towers Way of Working policy. This policy is sent to our suppliers for signature before any contract can be agreed.
Conflict of interest	A conflict of interest may arise whenever we find ourselves in a position where our personal and business interests potentially come into conflict.
Contractors	A person or firm that undertakes a contract to provide materials or labour to perform a service or do a job. Contractors could be the direct supplier for Vantage Towers. They could also be provided by the supplier to provide a service. In this case, the contractor would contract with a supplier, who would in turn contract with Vantage Towers.
Discrimination	For these purposes, 'discrimination' includes less favourable treatment based on gender, age, disability, gender identity, sexuality, religious belief, or ethnic origin.
Financial integrity	Financial integrity includes: • Understanding and applying the finance and expense policies relevant to your role. • Striving to find the best value when spending company money. • Understanding when you can and when you can't commit Vantage Towers' funds. • Purchasing goods and services only through our registered suppliers. • Trying to find the right balance between business need, environmental impact, financial cost, and your health and well-being when planning your travels.
Harassment and bullying	We define harassment and bullying as unwanted behaviour from another person, which is perceived as intimidating, malicious, offensive, insulting, humiliating, or degrading.
Inside information	Any information that is precise and specific about circumstances (occurrence probability >50%), that has not been made public and relates to Vantage Towers or its shares which, if made public, would be likely to have a significant effect on the price of Vantage Towers securities.
Phishing	The fraudulent practice of sending emails pretending to be from reputable companies to induce individuals to reveal personal information, such as passwords and credit card numbers.

Procurement	Procurement is the act of obtaining goods or services. At Vantage Towers, this refers to our entire supply chain operation, wherein all steps taken culminate in a final purchase decision.
Risk	A risk is a positive (opportunity) or negative (threat) event or development that, if it occurs, could potentially affect the strategic objectives of a company in either direction.
Risk appetite	The level of risk the organisation is willing to take in achieving its strategic objectives.
Sanctions	Economic sanctions are restrictions on trade, travel and financial transactions imposed by one country or a group of countries, on another country, or entity i.e., a company, group or individual. Today, most governments around the world operate a range of economic sanctions against certain regimes. Economic sanctions are often imposed as a result of observing a country or entity threaten domestic or international peace and security, such as violating human rights or promoting terrorism.
Sanctions restrictions	Restrictions imposed on a sanctioned country or entity could include: limiting, or even banning, any transfer of funds to them; freezing their assets; banning the transfer of economic resources to them. If the sanctioned country or entity were to restore order (e.g., stop violating human rights), the sanctions might be lifted, and they could benefit from international trade again.
Sensitive information	Sensitive information can include legal agreements, technical specifications, or any other information, which is unlikely to be publicly known, and may have commercial value.
Sideline activities	Any secondary or additional occupations.
Social engineering	Social engineering is the manipulation of people to get them to do something that weakens the security of an organisation. One of the ways criminals do this is to convince people to give up their user IDs and passwords, for example, through a phone call in which the perpetrator pretends to be an old friend of the victim in order to elicit sensitive information. Another form of social engineering is the sending of phishing e-mails that look deceptively like those of known organisations (and even one's own organisation).
Supplier	A person or organisation that provides something needed such as a product or service.

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