

## Anti-Corruption Directive

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## **1 General**

### **1.1 Purpose**

Swisscom rejects all forms of corruption. Swisscom operates fairly, honestly and transparently.

This directive sets out the type of conduct that is either admissible or inadmissible as part of professional activities. Supported by additional measures, it aims to protect Swisscom employees (“employees”) and Swisscom from prosecution.

### **1.2 Scope**

The directive applies to the Group divisions and Group companies and is subject to the stricter legal systems and legal practices in force in other countries.

The Group’s divisions and its associated companies may issue supplementary regulations.

## **2 Corruption**

Corruption refers to the abuse of a professional position of trust for private gain.

Granting unfair advantages has a negative impact on the independence, objectivity and freedom of action of the accepting person in reaching their professional decision and damages the interests of their employer. Unfair advantages are any advantages to which the individual has no legal entitlement, i.e. gifts, invitations, perks, promise of employment, etc.

Cases of corruption exist as a result of the offering as well as the acceptance of an unfair advantage.

By contrast, **no corruption** exists,

- if advantages are only granted or accepted in private relationships (e.g. gifts among friends);
- if there is a legal entitlement to an advantage (e.g. compensation for damages or inviting employees for training abroad based on a contractual obligation);
- if advantages are granted to a person independent of their professional or official activity (e.g. discounts and goodwill payments to customers in the shops, submission of test devices (mobiles, tablet PCs, etc.) for a limited period of time to promote a purchase decision);
- if the advantage is granted to the company or the authority and not to an employee or an official (e.g. discounts during contract negotiations, goodwill payments in the event of a complaint).

## **3 Rules of conduct**

All employees are prohibited from engaging in any form of corruption.

Acts of corruption may not be committed, whether directly or indirectly (by consulted third parties or for the benefit of third parties, e.g. by sponsoring events). Payments to accelerate official acts (“bribes”) are also prohibited.



If transactions can only be concluded through the granting of prohibited advantages, these transactions must not be entered into. The following code of conduct guidelines apply for each individual group company.

### **3.1 Granting or accepting minor gifts and other advantages**

Employees may grant gifts and other advantages with a maximum market value of CHF 100 to a private individual no more than three times per year. The same applies when accepting such gifts and other advantages from a company. Monetary gifts (cash or other monetary compensation, e.g. cheques) are always prohibited.

If Swisscom has been notified of bans (e.g. by contract or written order) that also restrict or prohibit the acceptance of these kinds of minor advantages, these must also be complied with.

If employees cannot refuse gifts that exceed the threshold of significance out of courtesy, these gifts must be surrendered to Swisscom so that they can be used for a charitable purpose.

The granting of gifts and other advantages **to officials** is **prohibited**.

Officials are members of a judicial or other authority (e.g. public administration employees), civil servants, members of the army, officially appointed experts, translators and arbitrators.

**Please note:** Private individuals are also considered to be officials, if and for the period that they perform public tasks. This may already be the case in the event of the fulfilment of an order (e.g. preparation of tender documents) for an authority. In case of doubt, private individuals must be treated in the same manner as officials.

### **3.2 Granting or accepting invitations to events**

The following generally applies for invitations:

- They must not be extravagant or excessive;
- The granting or acceptance of invitations must be in Swisscom's overall business interest;
- The acceptance of travel or accommodation expenses must not be granted or accepted;
- They may only be offered for customer events (customer platforms) organised or sponsored by Swisscom;
- Any co-payment by the invited person is not to be taken into account when calculating the following thresholds.
- If Swisscom has been informed of bans by companies or authorities that restrict or prohibit the acceptance of invitations, these must be complied with.

#### **3.2.1 Minor purely informational events**

Employees may issue or accept invitations to purely informational events **to/from private individuals and officials**, if:

- the arrangement of the event, including location, is appropriate for the professional purpose and



- any catering or small gifts does not exceed a market value of CHF 50.

For purely informational events, the main purpose must be the transfer of specialised knowledge or the presentation of the company's services and innovations. The events must provide a direct benefit for the companies or authorities to which the invited individuals belong as a result of the knowledge transfer.

### **3.2.2 Other events**

Employees may issue or accept invitations to other information or social events (e.g. sports, film, theatre, business events) **to/from private individuals**, if the following prerequisites are satisfied:

- The invitation has a total market value of less than CHF 100 per person (incl. accompanying guests) or
- The invitation has a total market value of less than CHF 300 per person (incl. accompanying guests) for executives and members of supervisory boards and
- no more than three invitations are issued/accepted annually per person.

If the market value exceeds the aforementioned threshold, or if invitations are to be issued to **officials**:

- the invitation must always be approved in the form of a signed declaration of consent by the responsible body of the company or authority to which the invited person belongs  
or
- the invitation can be impersonally issued to the company or authority. They must then decide whether an acceptance is permitted based on their standards and the individuals who are permitted to take part.
- at Swisscom, the manager is the responsible body. The manager must decide whether employees may accept invitations in compliance with the provisions in this directive.

### **3.3 Special case: members of parliament and publicly elected members of executive authorities**

Gifts and other advantages (section 3.1) or invitations to other events (section 3.2.2) may only be granted/issued to members of parliament and publicly elected members of executive authorities (e.g. councillors) via the Public Affairs unit (GCR-PA).

These advantages must not exceed a total market value of CHF 300 per person annually.

### **3.4 Ensuring transparency**

If the granting or acceptance of advantages is not transparent, this may arouse suspicion of corruption, lead to criminal proceedings and damage the reputation of Swisscom.

As a result, invitations must only be issued to the company, the authority or the business address of the person to be invited. They must transparently identify the advantages included and the respective market value. The market value is the price payable by a third party, if they wish to acquire the advantage on the market (i.e. without a volume or corporate discount and incl. the costs of an accompanying guest where applicable).

### **3.5 Archiving documentation**

All documents on events must be archived so that they can be retrieved for 15 years from the date the advantage is granted. This particularly applies for signed declarations of consent submitted by companies and authorities and the impersonal letter of invitation to the company or authority (cf. section 3.2.2) as well as their response with regard to permitted invitations.

### **4 Financing of parties or politicians**

Swisscom does not provide financial payments to parties or politicians. The British/Swiss ski race for members of parliament is sponsored as part of the sponsoring strategy for snow sports.

### **5 Responsibilities**

The group companies define processes and templates that ensure that a central overview of all planned invitations to other events (section 3.2.2) exists and that the associated requirements defined in the directive can be ensured.

Every employee is responsible for complying with the requirements defined in this directive as well as with the processes and templates specified by the group companies. The respective manager must monitor compliance as part of their management tasks.

Public Affairs is responsible for compliance with the requirements in section 3.3 and must define the necessary measures

Swisscom's central sponsoring and event department provides tools and processes in order to ensure the compliant execution of its sponsoring transactions and the resulting invitations. Their guidelines must be complied with.

### **6 Conduct in the event of suspected corruption**

Employees who suspect corruption must contact their manager. They may also use the anonymous "Whistleblowing" reporting channel.

The information given will be checked and, if circumstances warrant, a charge will be filed with the prosecuting authority. The origin of the information is always treated as confidential.

Apart from in the case of improper reports, a whistleblower is protected from termination and other forms of discrimination.

### **7 Training**

Employees will receive periodic training in e-learning sessions. Specific, risk-based, training sessions will be held by Group Compliance for divisions that are particularly affected.



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## **8 Sanctions**

Employees who breach this directive must expect to be criminally prosecuted and bear the consequences under labour law, including dismissal without notice.