

Anti-Corruption and Business Ethics Policy

1. Introduction

- 1.1 Digi Communications N.V. (**DIGI**) and its subsidiaries (the **DIGI Group**) are committed to exercising high ethical standards and conducting business with fairness, honesty and integrity.
- 1.2 This commitment includes requiring all officers, directors, employees and contractors of the DIGI Group (**Personnel**) and partly-owned companies within the DIGI Group's control to take a zero-tolerance approach to bribery and corruption in any form.

2. Bribery

- 2.1 Paying and receiving bribes, or helping others pay and receive bribes, is strictly prohibited.
- 2.2 Payments made to expedite a routine official or commercial function - commonly known as facilitation payments - are bribes, and are strictly prohibited.
- 2.3 The DIGI Group does not tolerate retaliation against Personnel who refuse to pay or accept bribes, or who report suspected bribery.

3. Gifts and Hospitality

- 3.1 Personnel may give and receive occasional gifts and hospitality extended as a legitimate business courtesy in appropriate circumstances (obtaining advance written approval where required).
- 3.2 Personnel must not give or receive gifts and hospitality to or from public officials.
- 3.3 Personnel must openly and accurately record all gifts and hospitality given or received.

4. Political Contributions and Corporate Social Responsibility

- 4.1 Individual personnel shall not make political contributions or corporate social responsibility contributions on behalf of the DIGI Group.

5. Mergers and Acquisitions

- 5.1 The DIGI Group conducts risk-based due diligence in connection with any contemplated mergers or acquisitions, and takes appropriate steps to mitigate any risks identified.
- 5.2 The DIGI Group takes appropriate steps to integrate the target company into the DIGI Group's compliance framework.

6. Relationships with Business Partners

- 6.1 The DIGI Group only conducts business with third parties and customers who share DIGI's commitment to the highest standards of business ethics.
- 6.2 The DIGI Group conducts risk-based due diligence in connection with any new business with any third party or customer, and takes appropriate steps to mitigate any risks identified.
- 6.3 The DIGI Group is committed to monitoring its business relationships and investigating any

potential concerns about business ethics that may come to light from time to time.

6.4 The DIGI Group shall not make a payment to any third party without sufficient documentation being provided in support of such payment.

7. Concerns

7.1 Personnel must report any concerns about business ethics to the DIGI Compliance Group.

7.2 The DIGI Compliance Group will review each report submitted and, where appropriate, will conduct further investigation, make recommendations for remedial action and/or reporting potential issues to relevant law enforcement or regulatory authorities.

8. Further Information

8.1 All questions about these principles or other matters of compliance and ethics may be directed to the DIGI Compliance Group via email (grup.conformitate@digicomunications.ro).