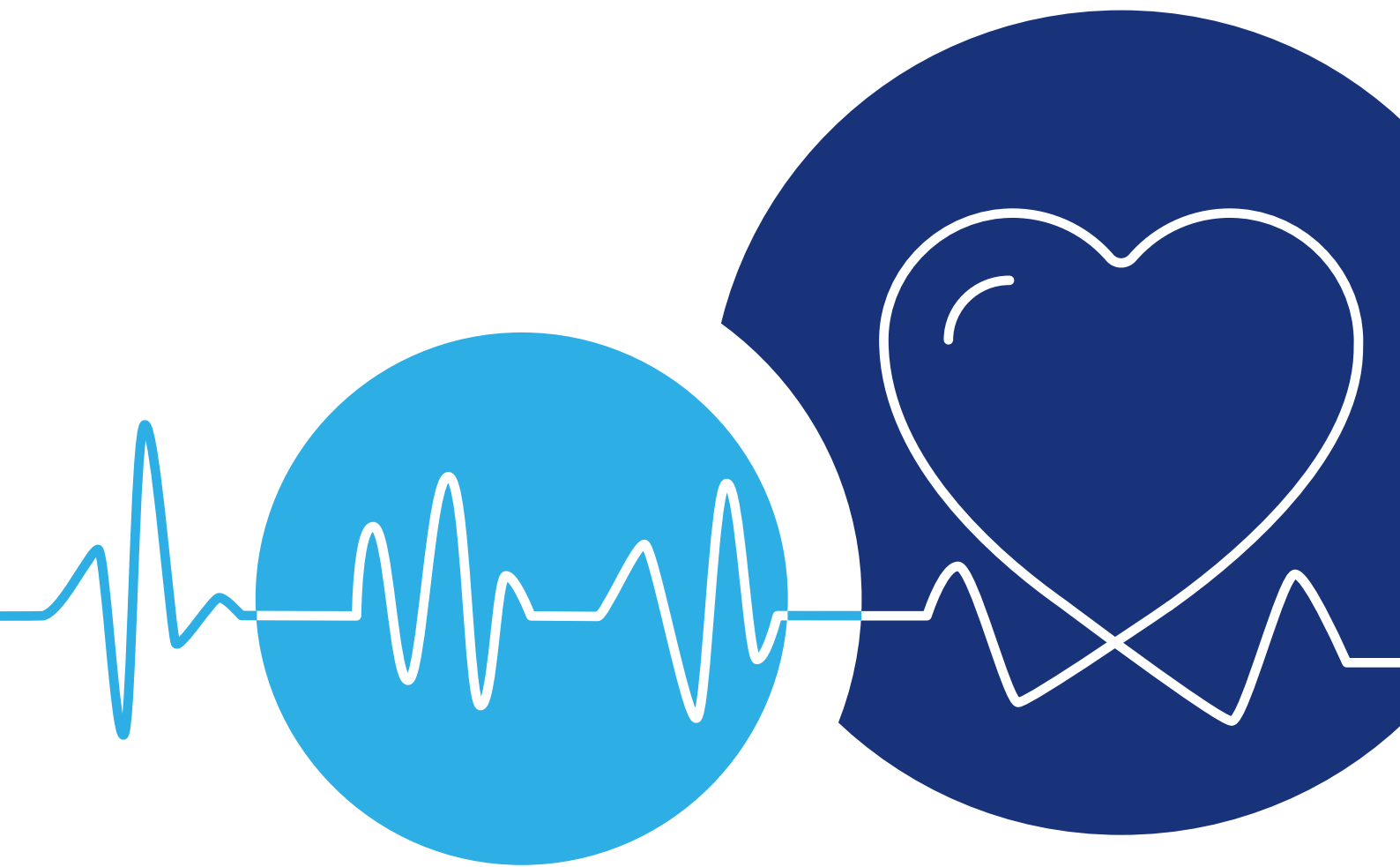


Code of Conduct.



1. Statement of the Management Board

We, the Tele Columbus Group, are one of Germany's leading fiber-optic network operators and providers of multimedia services. With a reach of more than three million households, we provide a range of high-speed internet products – including telephone, TV and on-demand video services – through our PŸUR brand. Together with our housing industry partners, we offer tailored cooperation models and state-of-the-art digital services such as telemetry and tenant portals. For business customers, we offer carrier services and corporate solutions under the PŸUR Business brand based on our own fiber-optic network and data centres.

Our success is founded not only on the dedication and commitment of our employees, but also on the actions of our suppliers and business partners. We are aware of our responsibility and place great importance on respecting ethical values and responsible behaviour. This applies not only internally in dealing with employees, but also externally in interactions with Company's business partners. Our conduct and decisions express the values of the Tele Columbus Group:



Performance: We work in a focused and collaborative manner to achieve excellent and high-quality results for our customers and are committed to everything we promise – both internally and externally.



Simplicity: We act in a solution-oriented manner in the interests of our customers. We look for quick and pragmatic solutions, but we also take time to review them. Everything we do is traceable and transparent.



Humanity: We trust the people we work with and for. We try to understand our customers and each other, ask questions, and always treat our counterparts with respect.

Legally compliant behaviour is always the top priority for all of us. Any violation of applicable laws or regulations can have serious consequences and will be followed up accordingly.

We summarise the core of our rules of conduct in our Code of Conduct. It serves as a framework for orientation and helps us live our values every day.

“Trust forms the basis of our success.”
We earn trust by acting with integrity.



Christoph Lütke
Chief Executive Officer
(CEO)



Christian Biechteler
Chief Sales Officer Housing
Industry & Infrastructure
(CSO HI&I)



Jochen Busch
Chief Consumer Officer
(CCO)



Tim Rhönisch
Chief Financial Officer
(CFO)

Berlin, April 2026

2. Our rules of conduct

2.1 Compliance-Check for decision making

We verify the integrity of our actions.

Why? Because we cannot and do not want to regulate every single action in a policy; we must develop our gut feeling for right and wrong behaviour.

What do we do?

We ask ourselves: Is my intention

- ☐ legal and permitted in accordance with our internal rules?
- ☐ in line with our values and the Code of Conduct?
- ☐ non-critical, meaning that I could tell my family about it without any problems?

If any answer is **no**, we consult with Compliance in advance and refrain from the action when in doubt.



.....

As employees and managers of the Tele Columbus Group, we value and appreciate people regardless of gender, age, appearance, origin, religious affiliation, or other individual characteristics.

We focus on cooperation and the shared success of our work. For ease of readability, we use the generic masculine form to refer to all genders without any value judgement.

2.2 ESG – taking responsibility

We are aware of our environmental and social responsibility and actively live up to it.

Protecting our natural resources (**E**nvironment), protecting people (**S**ocial) and good corporate governance (**G**overnance) are part of our corporate strategy.

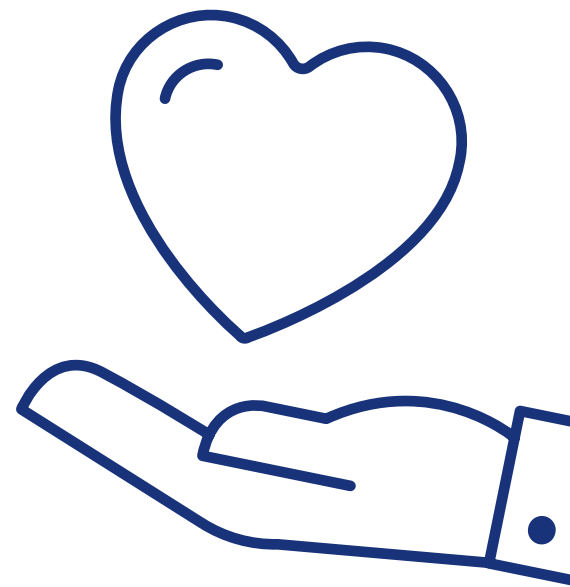
We support the right of every individual to fair, dignified, and respectful treatment. This includes a safe working environment and fair working conditions, both within our organization and throughout our supply chain.

Why? Because we want to and can help shape the present and the future. To do this, it is essential to protect the environment as well as the people. Fairness is a necessary cornerstone.

Our [Sustainability Programme](#) sets out the details.

What do we do?

- We have set ESG goals and are actively pursuing them.
- We are preparing the introduction of an environmental management system in accordance with EMAS.
- We observe a sustainable product strategy in our value chain and use a modern, circular economy model for our hardware.
- We respect human rights: We are committed to equal opportunities and promote a working environment based on respect and tolerance, in which the value and dignity of every individual is acknowledged. Harassment, bullying, and intimidation are strictly prohibited. We do not tolerate or accept any form of discrimination and reject child and forced labour.
- We support our suppliers in their efforts to respect human rights.

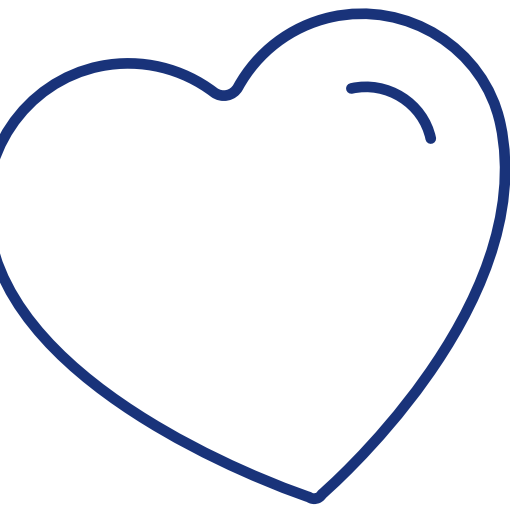


2.3 Showing respect

We value and promote open and respectful interaction.

We promote a positive corporate culture in which all employees feel comfortable. Therefore, we create a work environment that is free from discrimination and promotes diversity.

Why? People need to feel safe and accepted to be able to grow. For us, the diversity of our teams and the respectful interaction among our employees are an important cornerstone for our success.



What do we do?

- No one may be discriminated on the basis of ethnic origin or nationality, age, gender, physical or mental abilities, religion or belief, sexual orientation or social background.
- We highly value on equal opportunities, respectful behaviour, and constructive, cross-hierarchical communication. We promote awareness of these principles among our employees.
- All employees have equal growth and advancement opportunities.
- We have been signatories to the Diversity Charter since 2008 and, together with our employees, are committed to more diversity and inclusion for all employees, customers, and business partners.
- We comply with minimum wage requirements and adhere to applicable labour laws.
- We protect our employees from work overload and its consequences through a binding reporting procedure for such cases.
- We respect the freedom of association and assembly, and work cooperatively with the works councils.
- We prohibit the dissemination of media that glorifies violence, incites hatred or criminal acts, is sexually offensive, or is otherwise discriminatory. We take action against violence, discrimination, harassment, and bullying in the workplace.
- We continuously train all our employees on diversity and inclusion.

Employees can find details in the rules and regulations on diversity & inclusion on the [intranet](#).

2.4 Working with protection

We create a safe and health-promoting work environment.

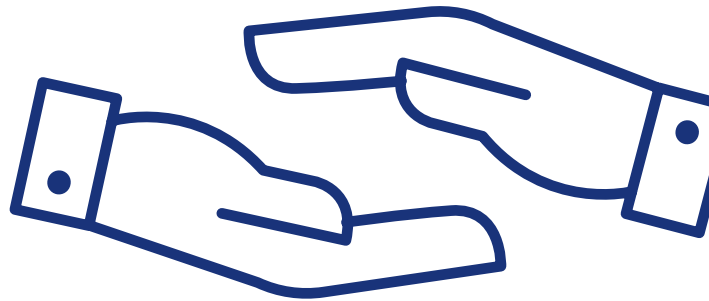
Safety takes priority. We place great importance on the health and safety of our employees. Therefore, all our employees are required to act safely and take the appropriate protective measures. We also protect the health and safety of those affected by our construction measures.

Why? A safe and healthy work environment promotes wellbeing, increases satisfaction and productivity, and helps to avoid workplace accidents and health problems. For us, occupational health and safety is therefore more than a legal obligation, it is an expression of our respect and care for each individual in the company.

Employees can find details in the [occupational health and safety regulations](#).

What do we do?

- We are constantly developing our working environment to make it safer and healthier.
- All employees have the opportunity to participate in free-of-charge programmes to improve wellbeing.
- Based on site inspections and feedback from our employees, we identify specific starting points for the further development of our programmes.
- We also protect the health of third parties by making our construction and repair work safe and contractually obligating our partners to do the same.
- We continuously train all our employees on occupational health and safety.



2.5 Protecting personal data and information

We protect information and personal data – both our own and the data of our customers and suppliers. Confidential information is also treated with the utmost care.

We oblige all employees and business partners to protect confidential information. Confidential information includes trade secrets, personal data, financial data, and other non-public information.

As a company, we comply with all applicable data protection regulations (in particular the General Data Protection Regulation and the German Federal Data Protection Act (Bundesdatenschutzgesetz)). We commit to observing the principles of data protection law (lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, and confidentiality) when processing personal data.

Why? Data is not only particularly valuable, but also sensitive. If it is abused, unjustifiably shared or stolen, this has serious consequences – especially for the person affected. We would lose the trust that our customers and business partners, as well as our employees, place in us.

Employees can find details in the Group policies on [Data Protection and Information Security](#).

What do we do?

- We observe the statutory provisions and our internal rules and policies when collecting, storing, and deleting personal data.
- We apply the principle of data minimisation.
- We protect all data stored with us through access rights (need-to-know principle).
- We undertake to adhere to an appropriate IT security standard in order to ensure the confidentiality, integrity, availability, verifiability, and traceability of confidential information at all times.
- We respect the rights of data subjects (e.g., of access, to rectification, erasure, restriction of processing, data portability, and to object) and are committed to fulfilling these rights.
- We continuously train all our employees on data protection.



2.6 Preventing bribery and corruption

We do not tolerate any form of bribery and corruption.

We will not give, offer, or promise anything of value, nor will we accept, request, or accept a promise of anything in order to improperly influence decisions – not even through third parties.

Why? Bribery and corruption undermine the trust of all stakeholders – including employees, customers, suppliers, and investors. A stable and permanently successful company cannot operate on this basis.

Employees can find details in the Group [Anti-Corruption](#) Policy.

What do we do?

- We ensure that the scope is appropriate when accepting/offering promotional gifts, business meals, and event invitations.
- We do not promise or give any benefits to public officials or politically exposed persons in order to unduly influence decisions. The same applies to private sector business partners.
- We do not pay bribes to speed up administrative processes (facilitation payments).
- We never support events (sponsorship) or charitable causes (donations) to unduly influence decisions. We do not make donations to political parties or foundations.
- We continuously train our employees on corruption prevention.



2.7 Avoiding conflicts of interest

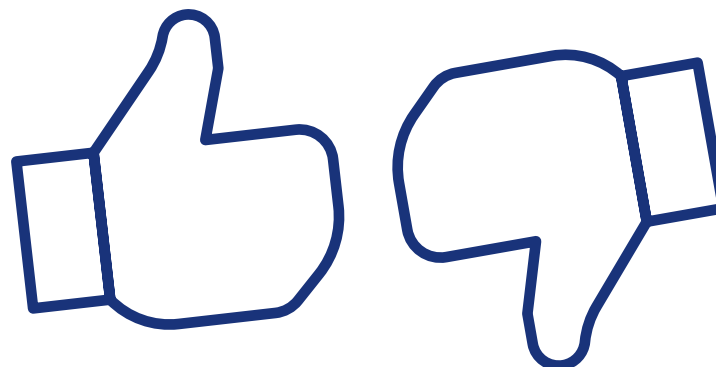
We do not allow personal interests to influence our business decisions.

Why? Business decisions should be based on objective criteria. Private interests can impair objectivity and can lead to fraudulent actions.

Employees can find details in the Group [Anti-Corruption](#) Policy.

What do we do?

- We keep private and business interests separate. If a conflict of interest arises, we work with the HR department to find a solution.
- We continuously train our employees on conflicts of interest.



2.8 Making competition fair

We value fairness and compete based on performance.

We respect the rules of fair competition and do not engage in behaviour prohibited under antitrust or competition law.

Why? Fair competition is essential to promote innovation and offer better products at reasonable prices.

Employees can find details in the Group Policy on [Antitrust Law](#).

What do we do?

- We are committed to complying with the [Haustürkodex](#), which sets standards for door-to-door sales, and also agree on this with our sales partners.
- We do not participate in price fixing or prohibited market behaviour agreements between competitors.
- We do not make untrue assertions about the products and market behaviour of our competitors.
- We do not attempt to improperly obtain information from competitors in order to boost our own success.
- We have trusting, fair relationships with our suppliers.
- We make use of all measures necessary to prevent money laundering in our sphere of influence. We ensure that we only work with reputable business partners who operate within the bounds of the law and do not use unlawful financial resources.



2.9 Securing assets

We protect the assets entrusted to us by our business partners.

Why? We are as committed to protecting assets for our investors as we are for our business partners. Only if we prove ourselves trustworthy can we work successfully.

What do we do?

- We safeguard business and trade secrets.
- We protect our business equipment and work tools from loss, theft, damage and misuse.
- We protect Tele Columbus's intellectual property (patents, brands and expertise). We also respect the intellectual property of our partners and competitors.
- We do not use insider knowledge or information about our business partners for private securities transactions.

3. Our whistleblower system: Speak. Freely.

We as Tele Columbus Group believe that we need to address things in order to change them. Therefore, we encourage all employees, our business partners, and third parties to report any possible misconduct by our employees, sales partners, and suppliers.

Why is this important to us?

Because it corresponds to our values of performance, simplicity and humanity. We are aware that a company can occasionally have blind spots. We therefore want to create a way to report concerns and possible irregularities securely and confidentially.

Where can reports be submitted?

Reports can be submitted at any time and anonymously, if desired, via our whistleblower system at:

telecolumbus.integrityline.app

We treat every report confidentially and follow up on each one conscientiously. We protect whistleblowers, therefore we do not tolerate any discrimination, hostility or intimidation against them.

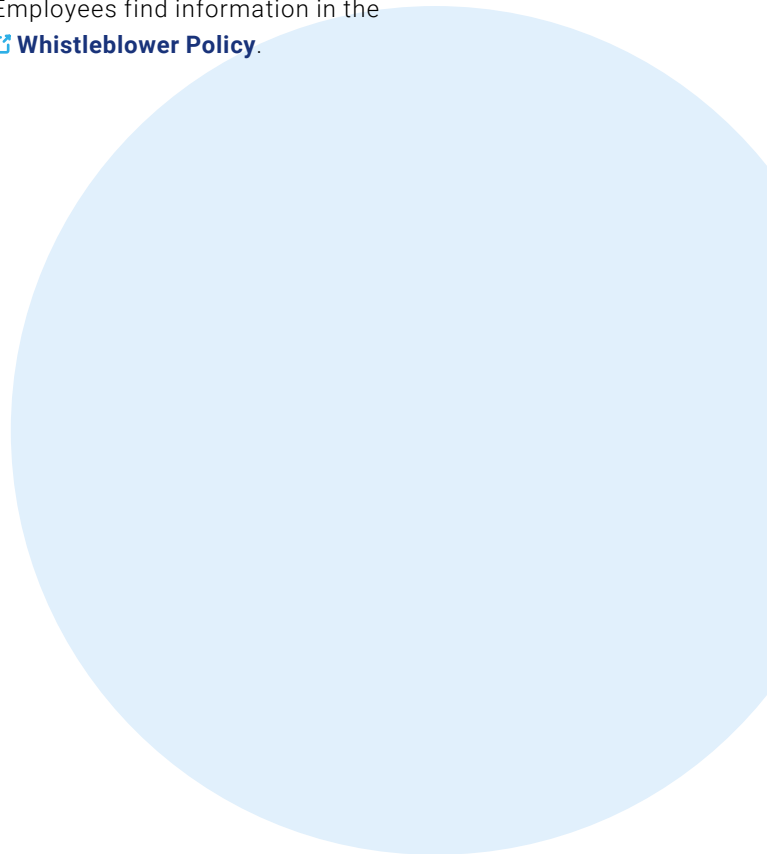
What can be reported?

We receive reports of violations of the following protective rights in the Tele Columbus Group and along the value chain:

- Violations of applicable law such as bribery or corruption (according to the HinSchG).
- Violations of internal policies and business principles (e.g. our Code of Conduct).
- Violations of human rights and labour law (according to the LkSG).
- Violations of environmental standards (according to the LkSG).

Information about handling whistleblower reports and complaints – additionally with respect to the Supply Chain Due Diligence Act – can be found in our [Rules of Procedure – Whistleblower and Grievance Mechanism](#).

Employees find information in the [Whistleblower Policy](#).

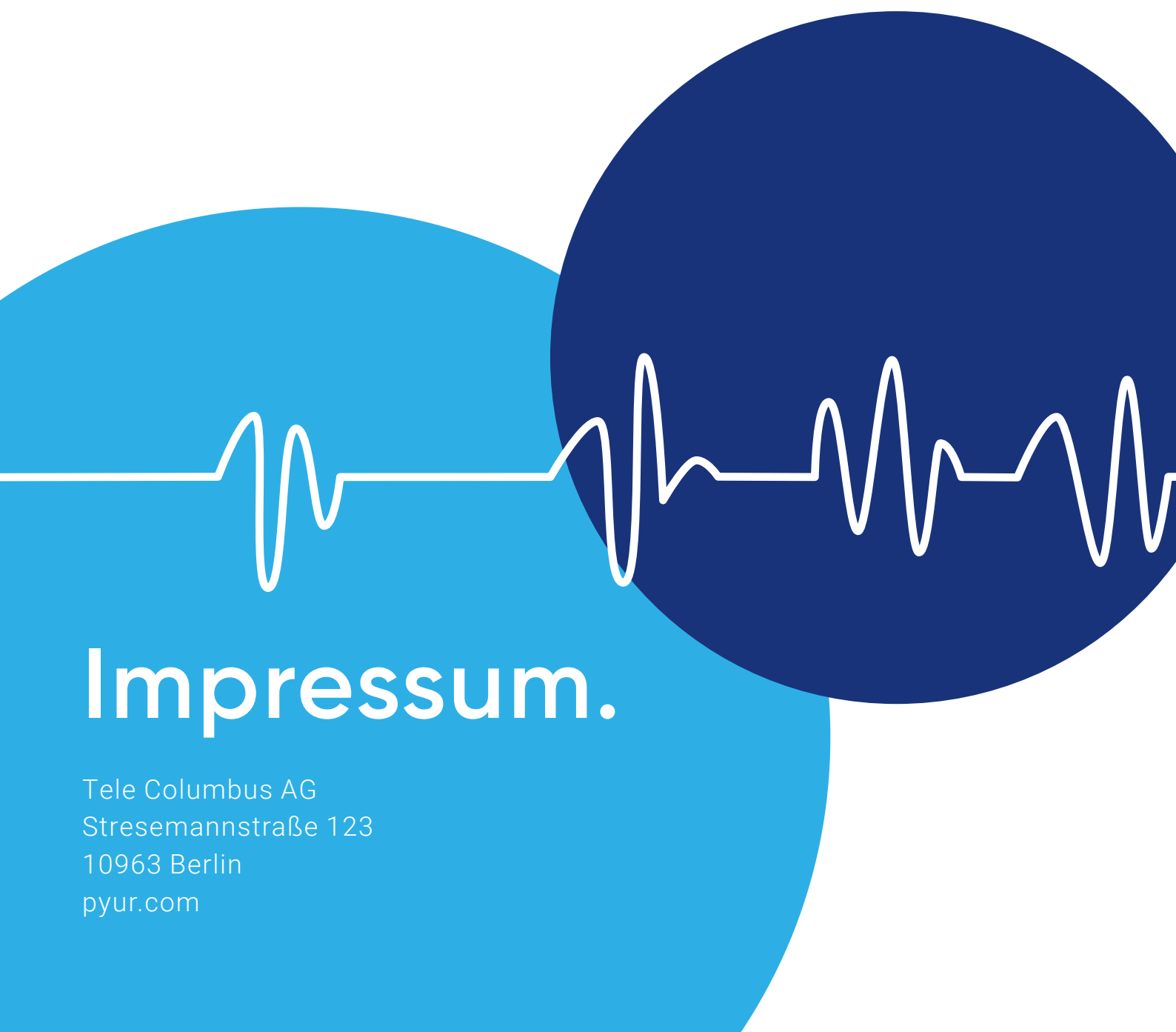


4. Questions

For questions regarding this Code of Conduct, all employees can contact their personal manager and the Compliance team.

Employees can find information about the compliance programme on the Group's intranet under [🔗 Compliance](#).





Impressum.

Tele Columbus AG
Stresemannstraße 123
10963 Berlin
pyur.com