

Sunrise Communications Group AG

Human Rights Policy

Version 1.0
Date 17 July, 2020

Approval & Entry into Force

The policy applies to Sunrise employees, the Board of Directors, management, and business partners, as well as to other Sunrise representatives.

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1. Objective

Sunrise Communications Group AG and its subsidiaries ("Sunrise") are committed to safeguarding human rights. At the basis of its corporate culture, Sunrise maintains the conviction that the safeguarding of human rights is an indispensable prerequisite for sustainable economic and social development that benefits everyone.

2. Legal basis

As a Swiss company, Sunrise refers to the human rights laid down in the Swiss Federal Constitution, the European Convention on Human Rights, and UN Covenant I and II.

Sunrise is committed to protecting the fundamental human rights of its employees, customers, and suppliers, e.g. to protect human dignity, equal rights, the right to life and personal freedom, protection of children and young people, protection of privacy, freedom of belief and conscience, and freedom of expression, assembly, and association.

3. Measures

Sunrise expects its employees, as well as members of the Management Board (ELT) and the Board of Directors, to comply with all current legislation, rules, and regulations at all times (Sunrise Code of Conduct).

3.1 Awareness and training

The employees and members of the ELT are regularly made aware of the Sunrise company values (bold, intuitive, positive) and the Sunrise Code of Conduct. Every two years, all employees and members of the ELT must complete electronic training that includes topics such as the content of the Sunrise Code of Conduct, anti-bribery regulations, and the procedure involved when a coworker or superior behaves in violation of the rules.

3.2 Risk analysis

A risk analysis of the current compliance situation is carried out quarterly, which also provides information about the situation with regard to human rights. The type and number of whistleblowing reports, reported cases of discrimination, and current legal cases are included in this risk analysis. If the risk analysis identifies an increased need for action, the necessary measures are defined by the Compliance Officer in coordination with the Head of Corporate Affairs, the Chief Human Resources Officer, and the General Counsel.

3.3 Complaints procedure and remedy of grievances

Employees can file a report via an internal whistleblowing portal if an action does not seem right to them: e.g. an incident that violates laws (e.g. fraud, theft, etc.) or internal rules (guidelines, regulations, policies); behavior that is discriminatory, offensive, or simply inconsistent with the employee's sense of ethics. Reports can also be made anonymously. Furthermore, the employee has

the option of contacting the staff committee or the responsible HR manager. If an employee feels discriminated against, he is also entitled to this procedure stipulated by the Diversity and Anti-discrimination Regulations.

Customers can report fraud or misconduct via the Sunrise homepage.

The respective office then decides which measures are necessary and which entities should be involved in order to support the individual concerned and to investigate the matter.

3.4 Reporting

The Board of Directors or the Audit Committee, which is composed of members of the Board of Directors, is informed quarterly about the risk analysis as regards the current compliance situation and is made aware of any grievances.

3.5 Suppliers

With their acceptance of the General Terms and Conditions of Purchase of Sunrise Communications AG, Sunrise suppliers are contractually obliged to comply with an appropriate industry standard such as the Responsible Business Alliance Code of Conduct (RBA Code of Conduct).

The supplier confirms that it is completely familiar with the RBA Code of Conduct and undertakes to apply the principles laid down therein with regard to the fulfillment of these purchasing conditions. These principles relate in particular to the non-discrimination against employees, combatting bribery, the safeguarding of international human rights, responsibility towards the environment, and avoiding conflicts of interest. The supplier also acknowledges that the violation of these principles is considered a violation of the purchasing conditions (see Sunrise Supply Chain Management Policy).

Approved by the CEO and CAO on July 17, 2020



André Krause
CEO



Marcel Huber
CAO