

Sunrise Code of Conduct

Introduction

We are the largest private Swiss telecommunications provider and offer our customers the best possible experience with our convergent and innovative products at the best prices. We want to drive the growth of our business forward and offer our shareholders a successful investment. We are a preferred employer and draw new talent by offering our employees attractive jobs in which they can develop their full potential.

This Code of Conduct expresses guiding principles that are consistent with the basic principles of our company and management. This Code applies to Sunrise employees, the Board of Directors, management and business partners, as well as to other Sunrise representatives.

Our stakeholders

The customer is always in the center of our activities, and we make every effort to offer each customer the best possible experience. At the same time we never lose sight of our social responsibilities to our customers, employees and the environment.

Diversity and non-discrimination

Every individual is unique. We support and respect this individuality, and we do not tolerate harassment or discrimination.

Fairness and transparency

- We communicate directly and openly with our customers, employees, colleagues, shareholders and all other stakeholders.
- We act with integrity and according to ethical principles.
- We avoid situations in which our financial or personal interests, or our relationships come into conflict with the interests of Sunrise. If any conflict of interest arises, we act according to our best knowledge and belief and our duties to Sunrise, and we inform our superiors without delay.

Data protection, data security and protection of personal privacy

- We manage our business in compliance with all applicable laws, including internal and external rules and regulations.
- We act with integrity and according to ethical principles.
- We keep this and other sensitive company-related data strictly confidential and take appropriate technical and operational measures to protect it.
- We avoid situations in which our financial or personal interests, or our relationships come into conflict with the interests of Sunrise. If any conflict of interest arises, we act according to our best knowledge and belief and our duties to Sunrise, and we inform our superiors without delay.

Legal compliance

- We manage our business in compliance with all applicable laws, including internal and external rules and regulations.
- We place particularly high value on the following issues:
 - Anti-corruption: We do not offer or accept gifts or donations. We do not tolerate any payment or acceptance of bribes.
 - Insider trading: We do not abuse access to insider information for insider trading.
 - Anti-competition law: We comply with the principles of fair competition and do not tolerate anti-competitive behavior or the abuse of market dominance.
 - Controlling and auditing: We guarantee truthful bookkeeping and reporting and support internal risk management and auditing to control our business figures and processes. We promote these processes by cooperating with the regulatory authorities and our external auditors.
 - Corporate tax responsibility: We guarantee that we pay taxes in Switzerland where the economic value is created.

Remuneration at Sunrise

- Sunrise takes the issue of equal pay for men and women very seriously. It therefore conducts regular reviews to ensure all individuals who perform the same tasks are paid the same wages or salaries. Sunrise is against any type of gender-based differences in remuneration at the company; pay should only vary in accordance with functions and pay grades. Any Sunrise employee who believes the principle of equal pay for equal work has been broken should inform their supervisor and the HR department of the suspected breach.

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- We adhere to this Code of Conduct and these guidelines. If we have any questions about specific issues, we contact our superior or the Compliance Department. We reject every practice that is not consistent with this Code. We report violations of the Code of Conduct to our superiors or through the Sunrise whistleblowing portal.
- Violations of our Code of Conduct will not be tolerated and will lead to disciplinary measures.

Glattpark (Opfikon), July 2019

Peter Kurer
President of the board

Olaf Swantee
CEO

Sunrise