



KPN

Code of Conduct

The KPN way

Contents

Together we are KPN	3
How to read and apply our Code of Conduct	4

The KPN way

Why are we doing this?	7
Who does our Code of Conduct apply to?	7
What does this mean for you?	8
Help in making good decisions	10

That's how we treat each other

A diverse, inclusive and equal KPN	12
Feeling safe at work	14
A safe and healthy workplace	16

How we do business

Gifts and invitations	19
Conflicts of interest and non-company activities	24
Fair competition	26
Working with our suppliers	31
Fraud	34

Handling the resources and information of KPN

Protection of personal data	36
Dealing responsibly with access and company resources	38
Dealing responsibly with digital security	40
Dealing responsibly with data	42
The responsible use of AI	44
Reliable records and reporting	47

Communications and society

Internal and external communications in the KPN way	50
ESG: #BetterInternet	52
Human rights	54

Speak up!

Having concerns. Need for advice. Or if you want to report something	56
Privacy and your position once you make a report	58

Together we are KPN

Dear colleague,

At KPN, we go all out to connect everyone in the Netherlands to a sustainable future. To that end we improve our network every day. Safer. More socially aware. Greener.

Underlying this work are our core values: Trust, Courage, Growth. We focus all attention on our customer. Thinking big, doing big. And working together to win together. So that everyone in the Netherlands stays connected.

This goal is reflected in the way we do things. We want to do the right thing, every day. Making ourselves better. Creating a positive impact on society. Always aiming to win. But only winning in the right way. By doing good. Even if that means losing out on business opportunities.

In this Code of Conduct you read about how you contribute. And what we expect of you. Part of this lies in how we treat each other. How we help each other get ahead. How we speak up where necessary. And, most importantly, how we do all of this together. Because together we are KPN. This togetherness is always more important than your own team and your own interests. Together we take our responsibility and abide by this Code of Conduct. And keep on doing the right thing. For each other, our customers, shareholders, and society.

That is the KPN way.

KPN Board of Management

Joost Farwerck, Chris Figee, Marieke Snoep, Chantal Vergouw, Wouter Stammeijer and Hilde Garssen



How to read and apply our Code of Conduct

Our Code is a guide on how to behave as a KPN employee. It sets out our rules and what we expect of you in day-to-day situations. We explain what is appropriate behavior and what is not. And how to make the right decisions. All KPN employees should be familiar with our Code. And behave accordingly. Because together we are KPN.

Our Code of Conduct, culture, core values, and purpose

Where to position our Code? How does it relate to our culture, core values, and purpose? Let us explain:

We go all out to connect everyone in the Netherlands to a sustainable future. That's our **purpose**. It's the highest goal that we aim for.

We do it based on our 3 **core values**. Trust, Courage and Growth. This is the thread that runs through everything we do. The thread we are guided by.

We have turned these core values into mottos that are fundamental to our **culture**. They broadly describe how we treat each other. How we do business.



And what is important to us in doing so:

Complete focus on our customer: we don't just discuss the present: we plan for the future. **Thinking big and doing big:** we say 'yes' to challenges. **Working together is winning together:** speak clearly, speak up, speak out.

Core values and mottos are important, but they don't explain what is expected of you in day-to-day situations. That's what our **Code of Conduct** is for. A tool to help you behave appropriately. In situations where there are rules that apply, but also in situations that are less clear. The Code will help you make the right decisions. Do the right thing. That is **the KPN way**.

What to find, and where?

The KPN way

Why we have this Code. Who it applies to. And what is expected of you. A difficult situation? The decision aid will give you further assistance.



Our rules and agreements for each theme

KPN's most important rules and standards of behavior cover 4 themes: 'That's how we treat each other', 'How we do business', 'Handling the resources and information of KPN' and 'Communication and society'. And useful links to further information.



Speak up!

What to do when you have a concern, you need advice, or if you want to report something. And how about your privacy and your position once you have reported something.





The KPN way

We go beyond just following the rules. The KPN way is about always making careful considerations. Treating each other and our belongings with respect. Taking responsibility. Doing the right thing, even in difficult situations. And especially: doing so together.

Why are we doing this?

Together we are KPN. We work hard to connect the Netherlands to a sustainable future. And to bring out the best in each other. We do this within teams, departments, and segments, but also outside and across them.

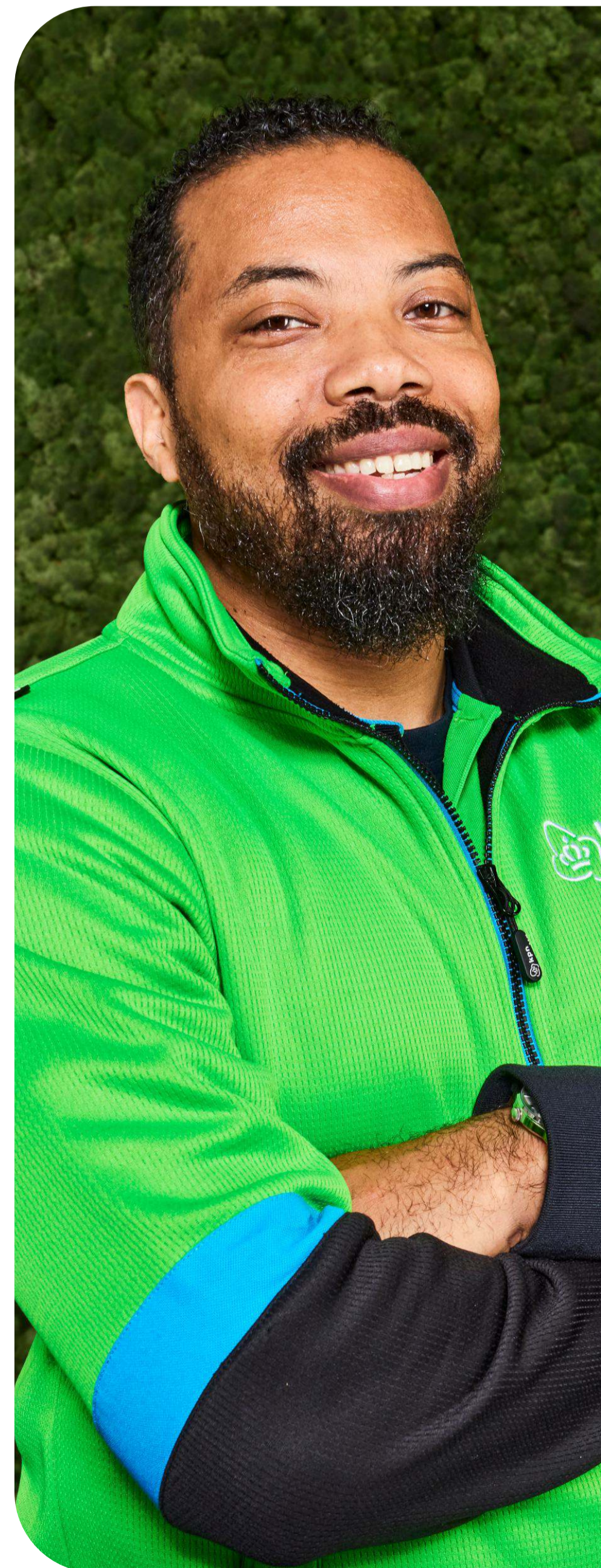
Wherever people work together, rules and agreements help. About how we treat each other. About making the right choices. Even in situations where there are no rules that apply. This is how we protect each other and others. It makes working together more pleasurable. And we make even more impact with our work. For everyone: from customer to colleague.

Who does our Code of Conduct apply to?

Do you work for KPN? Then this Code applies to you, irrespective of your job title. Also if you work for a subsidiary, or for a company in which KPN is the majority shareholder. In other words: all employees of KPN.

If you are a temp, freelancer, trainee, or on secondment, or perform work for KPN under a contract for services, then this Code also applies to you. We publish our Code on our website, so it is accessible for everyone we work with: contractors, advisors, and suppliers. That way, everyone knows about the KPN way.

We expect everyone who works for KPN to use our Code as a guide in their day-to-day work. And to play by the rules. Breaches may lead to measures being taken. What these measures are, can be found in the KPN CLA and on [TeamKPN](#).





Additional codes of conduct for certain positions

Certain colleagues are bound by additional codes. Examples include codes of conduct for ‘inside information’, ‘mechanics’ and ‘retail’.

The Business Control Framework (BCF) sets out the most important authorizations and responsibilities for Corporate Center departments. And for some positions within the segments. Here you will also find guidelines for these departments that apply throughout KPN. They apply mostly to specific situations, or to a small group of people, which is why they are not set out in this Code.

What does this mean for you?

In many work situations the rules are clear. They are dictated by laws and regulations, as well as our core values and work instructions. However, the KPN way goes beyond this. Especially in situations where there are no rules.

As a KPN employee you are always critical of your own performance. You take into account the various interests. Is it commercially interesting? Is it in the best interest for society? Do we want to do things this way? And does it align with our purpose, strategy, core values, and culture? By asking ourselves these questions we check whether it reflects what we do. In this way we do things and make things that suit KPN. And that are of value. For our customers, colleagues, shareholders, and everyone in the Netherlands.

All our rules and agreements about our behavior together constitute our Code of Conduct: the KPN way. It provides tips, our expectations, and a decision aid to help you in a situation where you yourself have to take the right decision. For each topic you will find links to further information. And the contact details of people on hand to help you if you can't manage alone. So that you can always do the right thing.

In practical terms we expect you to:

- **Follow our Code of Conduct**

And that you think about how you can apply the KPN way in the workplace.

- **Collaborate with others**

Because we don't and can't act alone. Seek help. Use the knowledge and skills of your colleagues. And in return lend a helping hand to others. That way we make better decisions and achieve better results

- **Do mandatory training on time**

So that you are always up-to-date about how we work together within KPN.

- **Speak up**

Sometimes rules are broken. Have you noticed something that is not ok? Speak up! Together we can prevent this from happening in the future.

And as a manager, of course, you have additional responsibilities.

- **Set a good example**

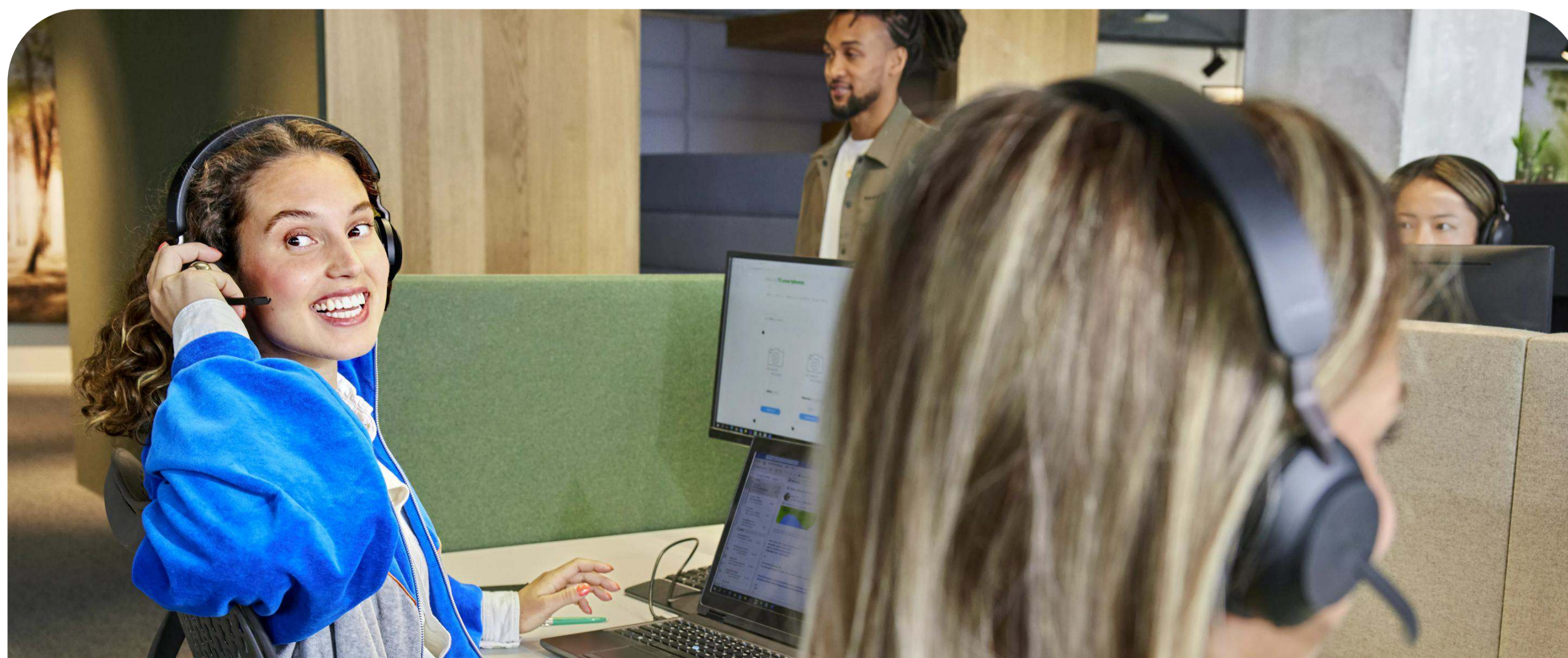
You show the KPN way both in word and action. And thereby inspire others.

- **Build the right culture**

You are clear about our Code. And what the KPN way means for you and your team. You ensure that everyone follows training in good time and create a good atmosphere. A space in which everyone can be themselves and is not afraid to speak up.

- **Listen and be supportive**

You are there to offer support and advice. And to lend an ear where needed. You make it possible to discuss difficult situations. Has someone reported something to you? Then follow up in the correct way. And treat it in confidence. Do you have a difficult decision to make? Our decision aid will provide further assistance.



Help in making good decisions

In some situations it can be difficult to make the right decision. This decision aid will help you. You can think of it as a compass. A roadmap to help you think carefully. And to make well-considered decisions in a new or unexpected situation. So that you can do the right thing. The KPN way

Together we are KPN. This togetherness is always more important than your own team and your own interests. We need each other's expertise. So we're always seeking collaboration. Especially when making difficult decisions.

Do you have all the facts?

+

Does it comply with the rules?

+

Is the effect on everyone involved acceptable?

+

Do you have enough information? Make a decision. And ask yourself:

1. Can I explain this to my friends, family, and colleagues?
2. Can this be in the newspapers or online tomorrow?

Are you unsure? Then discuss whether this is the right decision to make.

+

Have you taken a decision? Then don't forget:

1. Record how you reached the decision, including the points you took into account
2. Discuss with your supervisor whether - and if so, how - this decision can be introduced into general policy

Still unsure? Then discuss whether this is the right decision to make.

?

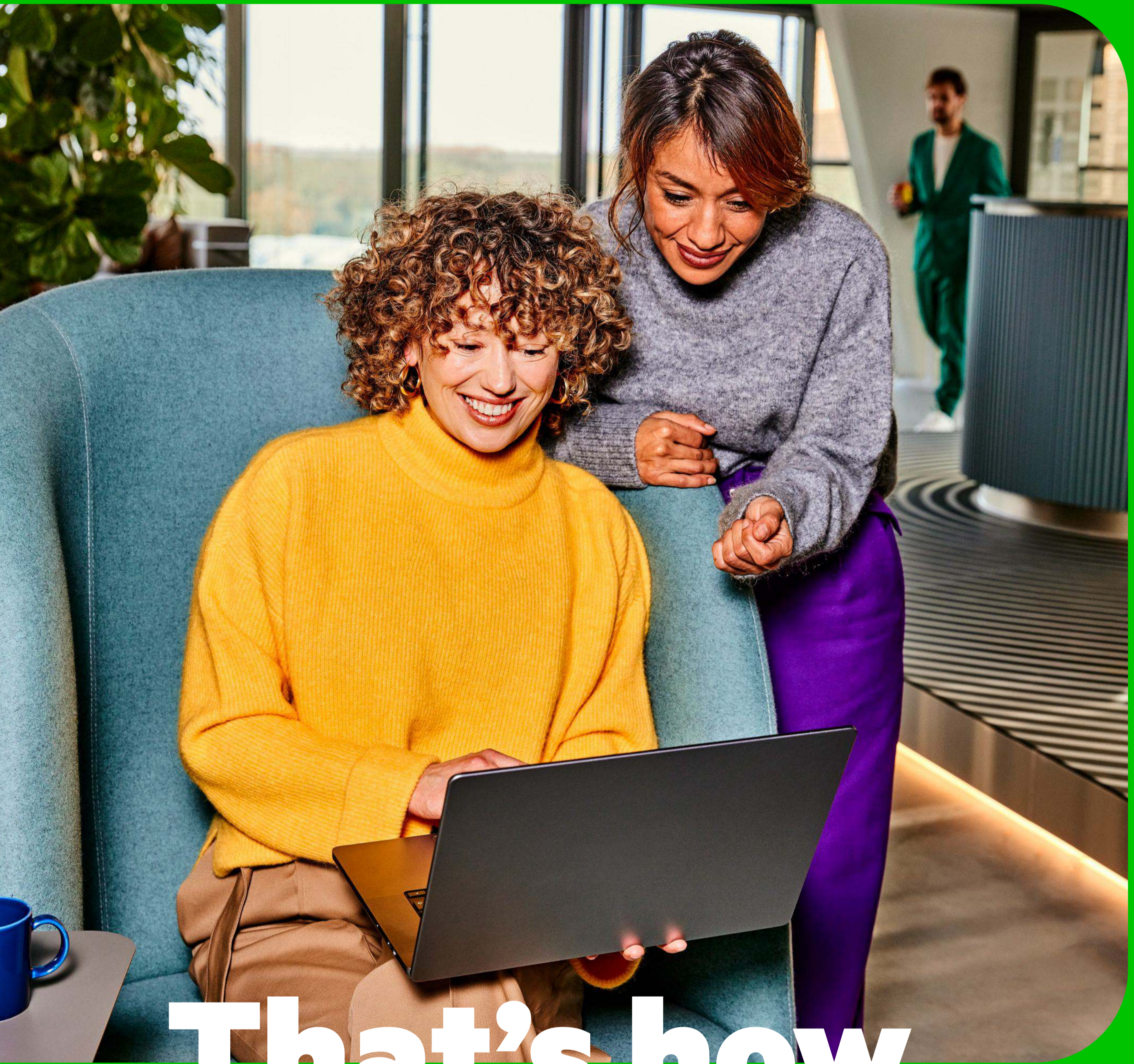
?

?

?

No/Not sure

Are you unsure about one or more questions or did you answer 'no'? Then you won't be able to make a well-considered decision. And that can cause harm to KPN, you, or others.



**That's how
we treat each
other**

A diverse, inclusive and equal KPN

Why are we doing this?

At KPN, we want everyone to feel welcome. To feel they can be themselves with us.

For us, this requires an inclusive, equal, and safe work environment. It's something we work on every day. We believe in the power of diversity. In cherishing our unique differences and focusing on the things that unite us. We give space to think and act differently. Because that's how we increase our innovation and creativity. It makes our work more fun. And ensures that we can all be ourselves.



This is what KPN does

- We develop policy and goals to protect and encourage diversity, inclusivity, and equality within our teams.
- We have made diversity, inclusivity, and equality an important element of our HR policy and the KPN CLA.
- We draw the attention of all our colleagues to unconscious biases and we share knowledge about diversity, inclusivity, and equality.
- We celebrate public holidays and pause for reflection on significant occasions, such as International Women's Day, Pride, Ramadan, and Diversity Day.
- We invest in internal and external diversity networks, to connect everyone.
- We make KPN as an employer, and our products and services, accessible for everyone, including for people with employment challenges or a disability.

And this is how you contribute

- You treat your colleagues with respect, irrespective of their background.
- You value the contribution of everyone: from different backgrounds, and with different experiences and perspectives.
- You help create an environment in which everyone counts
- You gain awareness of your own unconscious biases and how these influence the way you collaborate with colleagues.



Feeling safe at work

Why are we doing this?

At KPN, we want everyone to feel welcome, safe, and valued.

A social and safe work environment is our foundation and standard. We treat each other with respect. Inappropriate behavior? Speak up! We take this topic very seriously. This way, we create a happy workplace and reduce work-related stress together.



This is what KPN does

- We do not tolerate any intimidation (sexual or otherwise), discrimination, bullying, aggression or violence.
- We provide information and training about a safe work environment and make all colleagues aware of the consequences of unwanted behavior.
- We make sure that you can report any unwanted behavior easily and safely. We take every report seriously.
- We ask all KPN employees twice a year about their views on the work environment as part of the Pulse meeting.
- We take whatever steps are appropriate to each situation.

And this is how you contribute

- You help create a safe, open work environment by behaving respectfully at all times. Even if there is something really bothering you.
- You are aware of those around you: does someone perhaps need something extra?
- You speak up to colleagues or your manager – however difficult this may feel – if you are confronted by any unwanted behavior. Even if you are just a witness to it. You identify what it is that you find annoying, and how you would like things to be in the future.
- You appreciate that something you find innocent may feel annoying, hostile, or intimidating to others. At KPN we look at what effect this behavior has on the person on the receiving end. You need to be aware of this.
- You should report something that makes you feel unsafe at work and you are unable to solve the matter yourself or with your manager.

How can you respond to unwanted behavior?

There is no all-encompassing definition of unwanted behavior. It includes intimidation (sexual or otherwise), bullying, and discrimination. However, whether a particular remark or behavior is perceived as unwanted or transgressive is different for everyone. Therefore, KPN's starting point is the way it is perceived by the person on the receiving end.

Are you experiencing unwanted or transgressive behavior at work? If so, there are various ways to discuss this, seek advice, or report the behavior. KPN will always take such a report seriously and consider the most appropriate approach to deal with the situation.

Depending on the nature of the report, KPN can also decide to investigate the behavior of its employees. Such an objective investigation will form the basis for the decision whether or not to impose a sanction for the behavior.

A safe and healthy workplace

Why are we doing this?

At KPN, a safe and healthy workplace is fundamental.

Together we ensure good working conditions. We constantly monitor whether these conditions are sufficient, or could perhaps be improved. We look out for each other and lend a hand where needed.

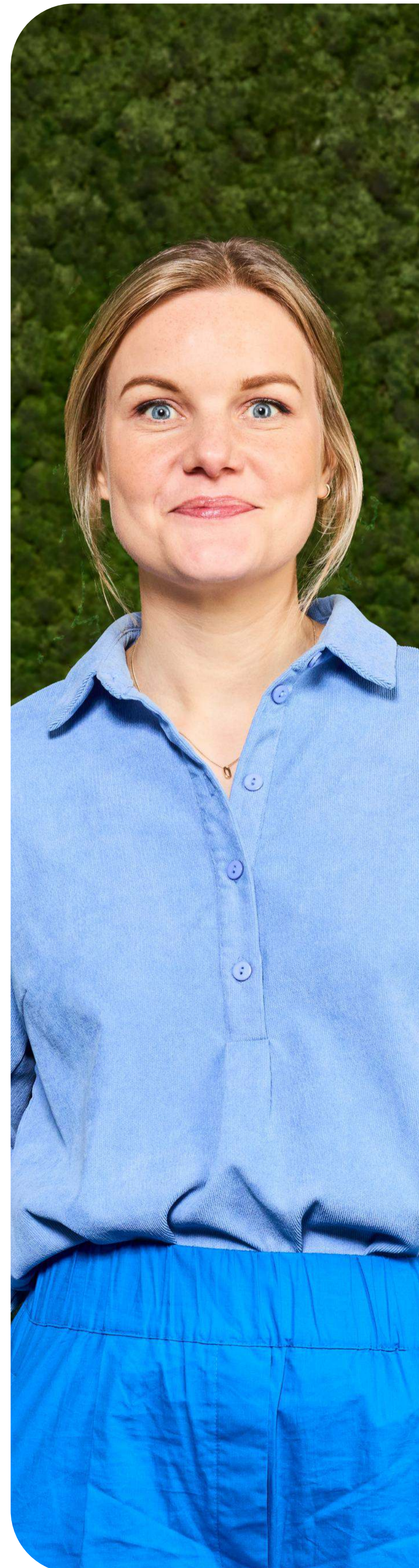


This is what KPN does

- We want you to feel happy and satisfied at work, that's important to us. That you feel physically fit. And mentally strong. KPN offers you training, courses, and support in helping you achieve this.
- We ensure that your workplace and work environment are safe, and provide you with the means to perform your work safely.
- We provide information and explain how to perform your work safely.
- We will ask your opinion on safety and health issues via surveys such as the Pulse.
- We take measures to eliminate or reduce the risks connected with your work as much as possible.
- We have an emergency response in our offices and combi-buildings as well as in our shops, which can provide first aid where needed.
- We ensure that you are able to report any unsafe situations, security incidents, or accidents internally.

And this is how you contribute

- You comply with the safety instructions and follow the training necessary for you to be able to perform your work safely.
- You ensure that you know the emergency numbers, safety instructions and emergency escape routes for the locations where you work.
- You use the tools we provide to improve your wellbeing and to be able to work in a safe and healthy way.
- You always report any unsafe situations, security incidents, and accidents as quickly as possible.
- You watch out for your colleagues and give a helping hand where needed.
- You never work under the influence of alcohol or drugs, or take medicines or other substances that could adversely affect your safety or that of other persons.





**How we do
business**

Gifts and invitations

Why are we doing this?

At KPN gifts and invitations do not influence the business decisions you take.

It's great to receive gifts and invitations. And they can help to strengthen business relations. But they can also give you the feeling that you are indebted to the giver. Especially if the gift or invitation is a reward for something done to benefit the giver. Then it is a form of bribery. This we do not allow.

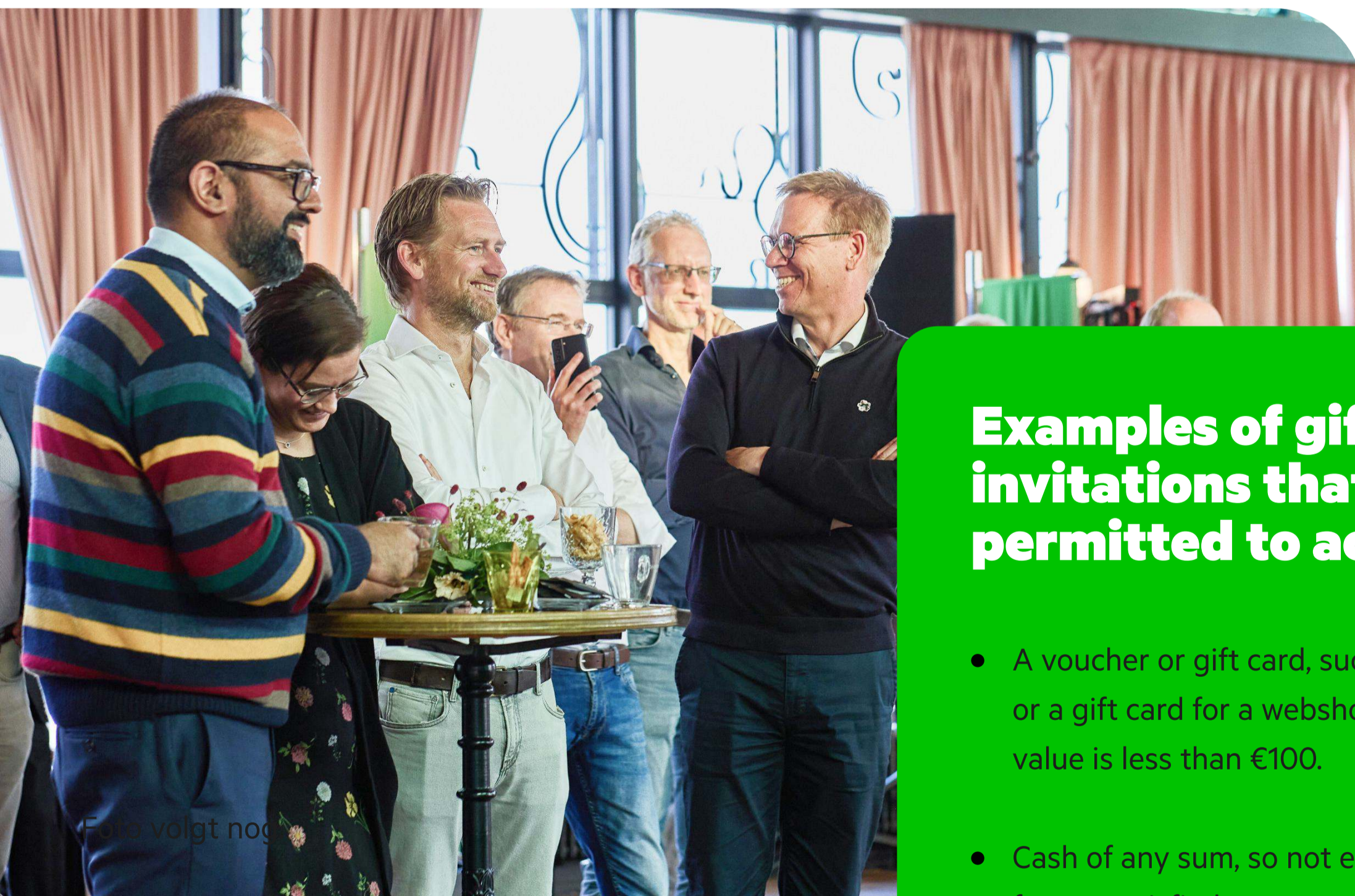
This is what KPN does

- We have set out all the rules and limits for the giving and acceptance of gifts and invitations in our 'Step-by-Step Rules on Gifts and Invitations'.
- We never ask for gifts, invitations, or donations – even to benefit good causes.
- We offer training on the giving and receiving of gifts and invitations.



And this is how you contribute

- You always consult the 'Step-by-Step Rules on Gifts and Invitations' before you decide whether or not you can give or receive a gift or invitation.
- You give a short and friendly explanation if you are not allowed to accept a gift or invitation.
- You discuss with your manager by email if in doubt about whether you may give or accept something. That way, the pros and cons are recorded in writing.
- You are aware that it is not only about the intentions behind the gifts or invitations. How it might appear is also important.



Examples of gifts and invitations that you are not permitted to accept.

- A voucher or gift card, such as a cinema voucher or a gift card for a webshop, not even if the value is less than €100.
- Cash of any sum, so not even a ten euro note from a satisfied customer.

Step-by-Step Rules on Gifts and Invitations

These Step-by-Step Rules do not apply to campaigns for customers in the Consumer Market.

Always begin with the 'Why' check.

Why is someone offering the gift or invitation or why do you want to offer someone a gift or invitation?

What is the background information? Do I, or does the other person, feel obliged to do the giving or receiving? Is something expected in return?

Do these questions raise doubts as to the appropriateness of giving or receiving the gift or invitation? If so, you should talk to your manager.

What if you are in no doubt? Follow the steps. If you can answer all questions with 'yes', you are allowed to give or receive the gift or invitation.



Has someone offered you a gift or invitation? Or do you wish to give someone a gift or invitation?

Then first check:

1. The value

- ✓ The value is less than €100.

2. The circumstances

- ✓ There is currently no discussion, RFP or negotiation with this party about any (expansion of a) contract or extension of a contract. There is also no claim in progress.
- ✓ If you receive an invitation: the person who invites will also themselves attend the event.
- ✓ If you wish to give someone something: the internal rules of the other party allow this other party to accept this gift or invitation.

3. The other party's job

- ✓ The other party is not a civil servant or other public official.

4. The type of gift

- ✓ It is not cash, or anything convertible into cash, such as a gift voucher.
- ✓ It is not any private discount or private benefit.

5. The location

- ✓ The event is held in the Netherlands.
- ✓ The gift has not been, or will not be, sent to a private address.

6. With your manager

- ✓ Does my manager allow it?

If you cannot reply to all questions with a ‘yes’, you may not give or receive the gift or invitation.

If there are nevertheless good reasons you would still wish to go ahead, you need to seek the consent of the higher manager via your own manager. This request should be made by e-mail. Your manager can assist you in this. You should properly file the approval or rejection that you receive via the exchange of emails.



Conflicts of interest and non-company activities

Why are we doing this?

At KPN we avoid any form of conflict of interest. We act always in the interests of KPN.

What is best for you is not always what is best for KPN. And vice versa. When interests overlap we call this a conflict of interest. Are you forced to choose between your own interests and those of KPN? This can have negative consequences. Not only for the organization, but also for your colleagues. And for you.

We therefore together ensure that we recognize and report conflicts of interest in good time. Including any conflict of interest related to non-company activities. This means any other work or voluntary work that you undertake alongside your job with KPN.



This is what KPN does

- We, as a company are positioned at the center of society. We therefore encourage personal activities outside work, such as a managerial function, voluntary work, or political activity.
- We explain what we mean by a conflict of interest and non-company activities. And what you must do if personal and company interests collide, or appear to do so.

And this is how you contribute

- You avoid situations in which your interests collide with the interests of KPN, or appear to do so.
- You prevent the work you do for or on behalf of KPN being actually or potentially influenced by your private interests.
- You discuss in advance with your manager your non-company activities, and the conditions and risks related thereto, and always register them in MijnHR.
- If you are unsure whether there is any conflict of interest, you should discuss this straight away with your manager.
- You transfer to KPN any income from a non-company activity that you perform from or due to your work for KPN. For example, if you give a lecture or write an article outside working hours as an expert due to your position with KPN.

A conflict of interest can arise, for example, in the following situations:

- In the case of work or personal non-company activities outside KPN, such as your own business, advisory work, supervisory directorship, the management of an association or foundation, voluntary work, or political activities.
- Involving family or friends.
- Involving personal or business relations with KPN customers, suppliers, competitors, or other third parties of importance to KPN.
- Involving commercial opportunities and information.
- Involving insider information.

Competing fairly

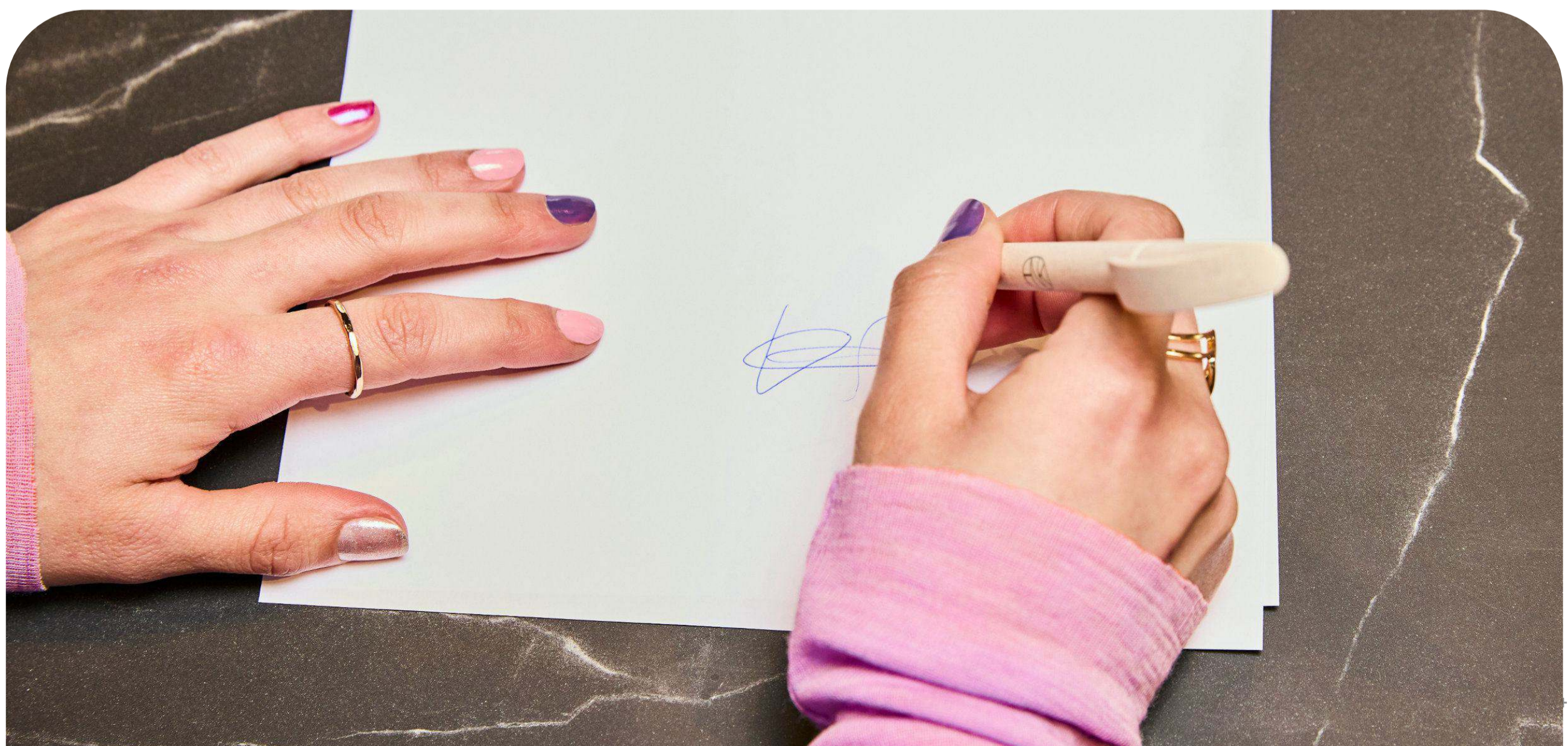
Why are we doing this?

At KPN, we compete fairly.

Market forces and fair competition cannot be viewed separately. Competition leads to innovation and economic growth. Giving customers more choice. Any behavior that harms fair competition is prohibited. This means that you may not agree any terms that restrict competition that are in breach of the prohibition on cartels. And you may not abuse any position of economic power. At KPN you may be faced with this.

This is what KPN does

- We only strive for an economic advantage if we can obtain it in a fair way.
- We are never a party to discussion, measures or agreements that do not comply with the competition rules.
- We give clear explanations and help with contacts with competitors.



And this is how you contribute

- **You do not agree terms that restrict free competition**

This means that you never agree terms with competitors, customers, or other commercial partners regarding:

- Coordination of prices, rates, or conditions for products or services that we sell or procure.
- Allocation of customers, territories, or markets.
- Exclusion of new parties from the market.
- Restriction of the sale or output in particular distribution channels or partnerships.
- Coordination or influencing of bidding ('bid rigging').
- Imposing of fixed prices on distributors for the resale of products or services to their customers.
- Entering into an exclusive collaboration or agreement not to compete against each other (non-competition agreement), without first having this tested.
- Agreeing terms with competitors on the conditions and remuneration of employees or third parties to be recruited (such as contractors, freelancers, etc.).

Check the information block 'What is an agreement?' for further details.

- **You do not exchange information with competitors**

- Don't share competitively sensitive information with competitors and customers, and do not accept any competitively sensitive information. This is information that can affect the market behavior of the competitor or KPN, and that is not yet in the public domain, such as information on business strategy, prices, price models, costs (elements), procurement prices, margins, customers, market shares, marketing plans, and sales figures.

What is an agreement?

In principle, coordination on competition falls under the prohibition on cartels, even if this does not lead to a firm agreement, and even if it is not actually implemented. It is irrelevant whether the communication is in writing, sent digitally (by e-mail or WhatsApp, for example), or spoken. Even attendance at a meeting or in a WhatsApp group at which others propose, take soundings about, or enter into an agreement may be regarded as coordination of competitive behavior.

- Only collate information about competitors via public sources or unsolicited feedback from customers. Never ask a competitor, a customer, a supplier or a consultant for competitively sensitive information and explicitly reject any information offered via these routes. Are you in this situation? If so, you should immediately contact Legal and Compliance. Also make a record of who offered the information, to avoid any uncertainty about this in the future.
- Check the information block 'Exchange of information' for more details.
- **You are alert during discussions and meetings with market parties**
Check the information block 'Discussions with market parties: how it's done' for more information.
- **You choose your words carefully**
Be aware of the impression you create through your choice of words – whether in a letter, email, text message (e.g. WhatsApp), telephone call or otherwise spoken. Sometimes a situation may appear anti-competitive due to a clumsy choice of words, even if that is not your intention.
- **You are extra careful if KPN has an economic position of power in a certain market**
It is not prohibited to have an economic position of power, but it is prohibited to abuse this position. To prevent abuse of this position of power, KPN follows the rules set out in the fact sheet 'Abuse of economic position of power'. Do you suspect that KPN has a significant market position in a certain market or do you have any uncertainty about that? If so, you involve Legal and Compliance in advance of agreeing any terms or entering into any contracts.
- **You are careful with wholesale information and respect 'Chinese walls'**
KPN allows competitors to use its network. We call this wholesale. It means we have access to confidential information from wholesale customers and their customers. We call this wholesale information. This is information provided to KPN before or during the negotiation of a wholesale service agreement and information that has been or may be obtained in the performance of such an agreement. This sort of information may only be used for the purpose for which it is acquired (restriction on use). You always treat this information as confidential, both internally and externally (duty of confidentiality). Are there any organizational or technical measures to keep wholesale information separate within KPN (so-called 'Chinese walls')? You must comply with any such measures. And you must not forward any information to other parties, such as other KPN business units, subsidiaries, or distributors (ban on forwarding). Check the fact sheet 'Chinese walls' for more information.

Explanation**Exchange of Information**

- You do not share competitively sensitive information with competitors, either directly or indirectly, such as via distributors, customers, sector organizations, or contractors ('hub & spoke'). Are you required to share competitively sensitive information about KPN with, for example, dealers or consultants so that they can perform their work? You inform them that they may not share the information with third parties. Have you received competitively sensitive information yourself? You destroy the information immediately and notify the sender. Never forward the information received, not even internally to colleagues. Always contact Legal and Compliance.
- You never use external communications (such as interviews or press releases concerning, for example, KPN's policymaking) to gauge the response of other organizations ('testing the waters') before any final decision of KPN is made on the topic.
- You may not participate in any messaging group (such as a WhatsApp group) or other social media group via which information is exchanged between competitors.

- You are extra careful during informal meetings with market parties such as suppliers and customers. Or when attending trade fairs, conferences and charitable or other gatherings. See also the information block 'Discussions with market parties: how it's done'.
- You must not share confidential information from or about KPN with people within your private sphere if they work for a competitor, distributor supplier, customer, sector organization, contractor, or other relevant market party.

Explanation

Discussions with market parties: how it's done

Is it important for KPN to discuss a matter with other market parties? If so, here's how it's done:

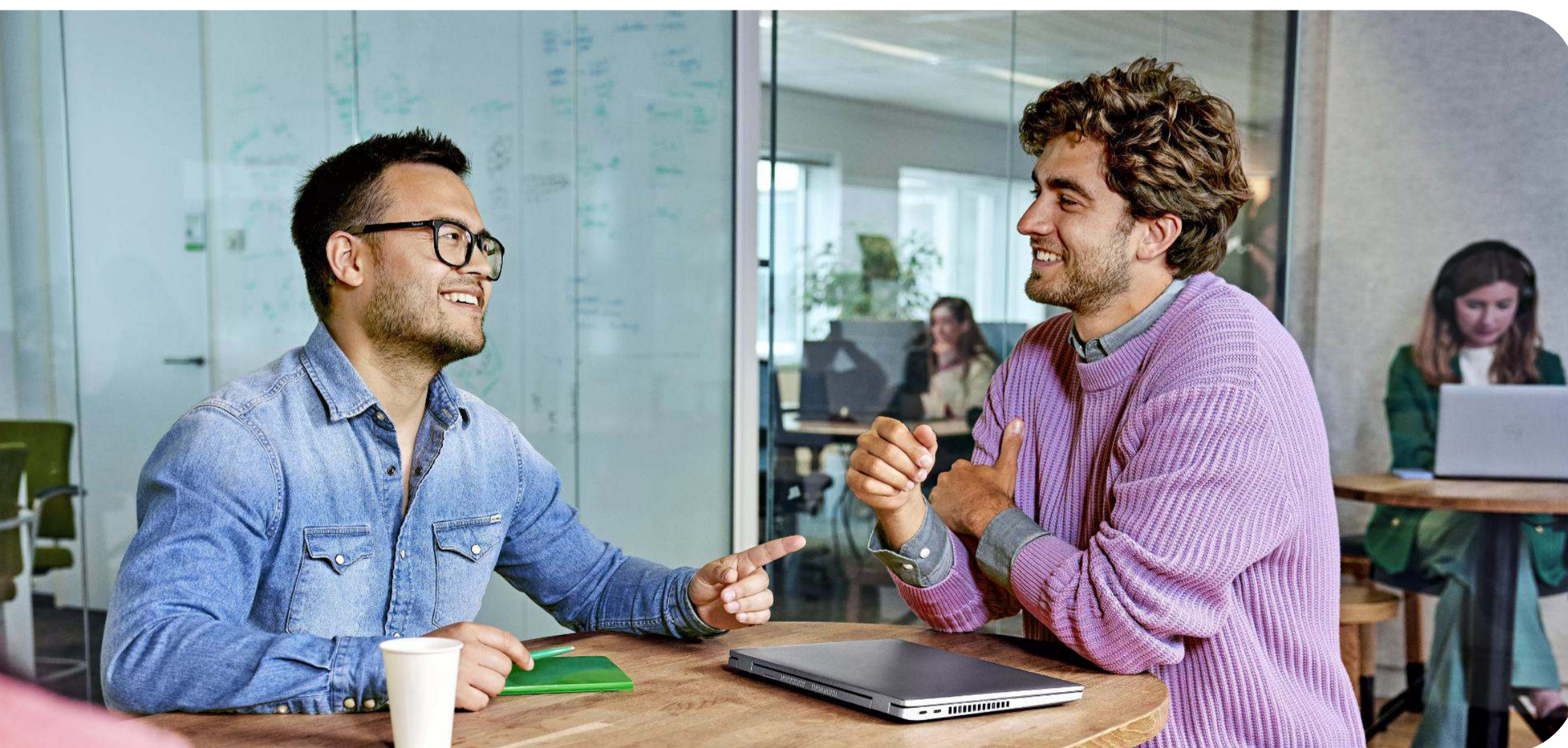
- Ask yourself if the discussion or meeting is really necessary and whether any 'banned topics' will be raised. See 'Do not agree terms that restrict free competition' for an overview. If you are in any doubt, contact Legal and Compliance.
- Only proceed if it is part of your job.
- Ensure that before any discussion or meeting you know what topics are on the agenda and what safeguards are in place to prevent the 'banned topics' being discussed. What if the agenda does not contain any information about this? Then do not attend the meeting and contact Legal and Compliance.
- End the discussion or leave the meeting if this heads in a direction that could conflict with the competition rules. For example, if there is a proposal to join forces. Or if commercially sensitive information is being shared. Ensure that your request to terminate the discussion and your departure are recorded in the minutes of the meeting and immediately contact Legal and Compliance.
- Following a meeting, always make minutes of the discussion and share these with everyone present during that discussion. What if someone makes the minutes? Then check these and where necessary put any comments in writing.
- Also, and especially, be careful during less formal events at which market parties meet together. Such as at award presentations, trade fairs, conferences, and gatherings for charitable purposes.
- Be aware that if you attend a meeting where competitively sensitive information is being shared or where banned agreements are being made, it may be assumed that KPN is also involved in this. For that reason, always stay away from such meetings.

Working with our suppliers

Why are we doing this?

At KPN, we procure products and services only from suppliers that meet our conditions.

Many KPN employees are involved in procurement and contract management. They may handle requests for proposal, or purchasing requests, placing orders and meeting (potential) suppliers. But they will also have contact with suppliers during trade fairs, conferences, and other events. Together we ensure that we have an effective collaboration with our suppliers. For a successful KPN and satisfied customers.



This is what KPN does

- We have set out our procurement principles and our procurement and contracts policy in clear terms in our Procurement Policy.
- We have a General Terms and Conditions of Procurement. This document contains the terms that form the basis of our contracts with suppliers.
- We have drawn up a Supplier Code of Conduct. This sets out what we expect from our suppliers concerning, for example, human rights, labor conditions, ethics, emissions and energy consumption.
- We apply objective criteria when selecting a supplier, based on matters such as quality, price, and suitability. We will not be influenced by personal interests.
- We carry out investigations before we enter into contracts or partnerships with suppliers. We investigate integrity, reputation, and compliance with the laws, regulations and ethical standards that apply in our sector. Depending on the outcome of this due diligence KPN will decide whether to collaborate with the supplier in question.



And this is how you contribute

- You comply with the Procurement Policy if you are involved in the procurement of products or services.
- You only work with suppliers contracted to supply the products or services in question. If there are no such suppliers, you should contact Procurement.
- You ensure that you never procure products or services outside the Procurement rules.
- You do not negotiate with (potential) suppliers without the consent of Procurement.
- You do not seek a request for proposal unless there is an actual procurement need.
- You always make clear that all offers and contracts are subject to KPN's General Terms and Conditions of Purchase when you seek a request for proposal. Ensure that the supplier has knowledge of, and agrees to, these general terms and conditions.

Explanation

These are our procurement principles

These procurement principles form the basis of our Procurement Policy. They apply to everyone involved in procurement activities within KPN.

- We procure products and services only in a way that is best for KPN as a whole.
- We promote competition.
- We treat all suppliers equally and we do not discriminate.
- We are independent and prevent (possible) conflicts of interest.
- We are objective in our decision making.

- We award contracts based on total value, including Environmental, Social and Governance (ESG) criteria.
- We comply with the law and KPN policies and procedures.
- We use designated processes, tools and systems, and work in a standardized and auditable way.
- We are professional and righteous and are aware that we act on behalf of KPN.



Fraud

Why are we doing this?

At KPN we do not tolerate any form of fraud.

At KPN, we find it important to always be honest and open. Fraud is never okay, and we do not accept it. It doesn't matter how it happens, who does it, or how much money is involved. Together, we must stop fraud. Pay close attention to signs of fraud and report it immediately if you see anything suspicious.

This is what KPN does

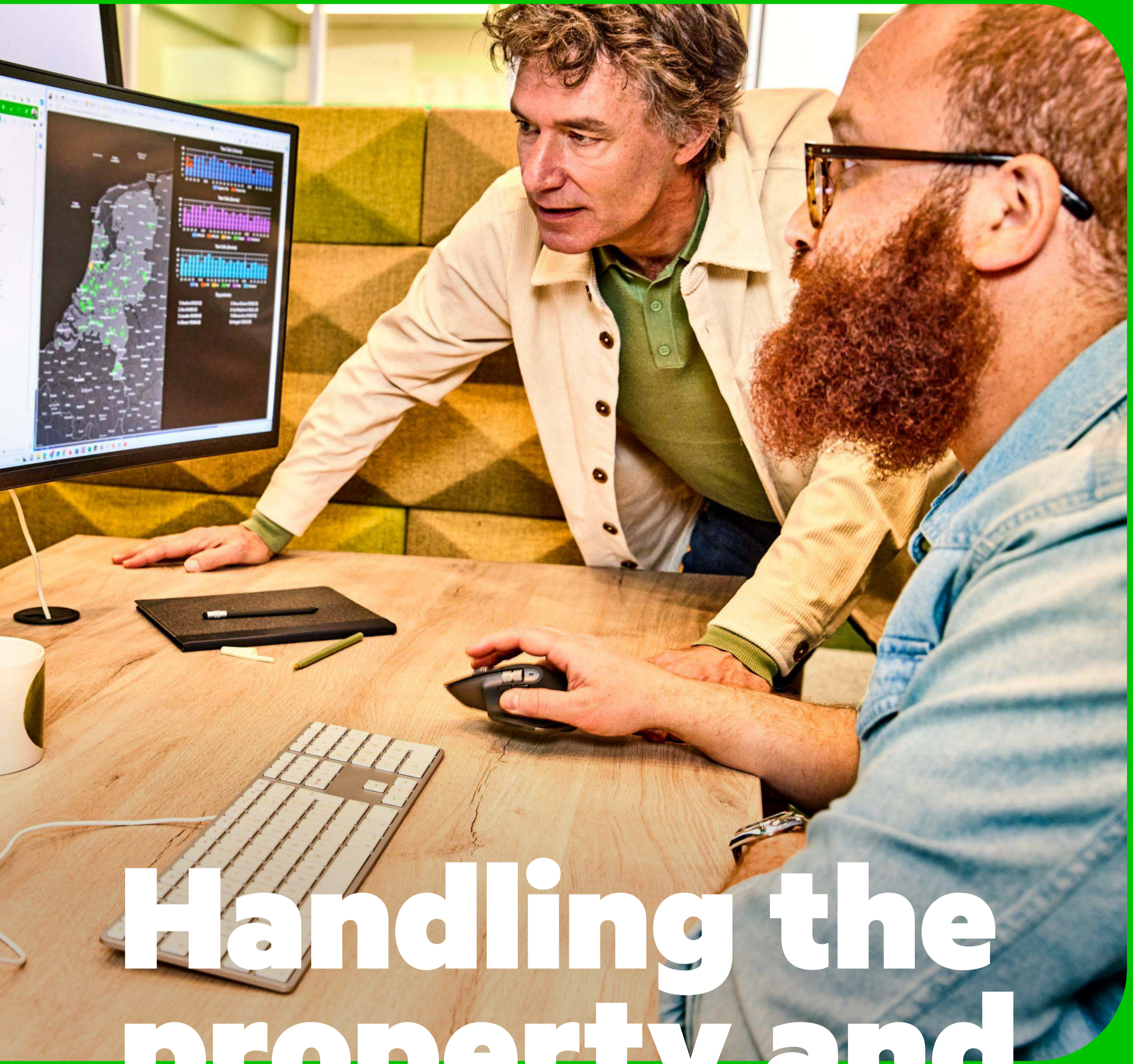
- We do not tolerate any form of fraud. We make no distinction between fraud committed by our own employees, people working on behalf of KPN, or third parties.
- We have a comprehensive set of rules and controls designed to prevent, detect, and respond to fraud. This set can be found in the Fraud Control Policy.
- We take all signs, suspicions, and accusations of fraud seriously, without exception. We investigate these as necessary and take appropriate action.

Fraud

Fraud is an act or omission, involving the use of deceit or deception with the intent to obtain anything of value or to secure an unjust or illegal advantage for one's own or another's benefit. This includes for example telecom fraud, bribery and corruption, misappropriation of assets, accounting fraud and financial fraud.

And this is how you contribute

- You help protect KPN against fraud by adhering to the rules, processes, and procedures.
- You are aware of the types of fraud that can occur within your area of responsibility and you are vigilant for signs of fraud ('red flags').
- You report any suspicion of any form of fraud. Refer to 'Speak Up!' for how to report. Reports can also be made anonymously.



Handling the property and information of KPN

Protection of personal data

Why are we doing this?

At KPN, the personal data of colleagues and customers are safe.

Our customers and employees share a lot of information with us. They trust us to treat it with care. We value that trust very much. If we do not treat personal data with care, we can face big penalties.

This is what KPN does

- We process personal data only for a justified and pre-determined purpose.
- We store personal data for the shortest time possible, and only for as long as necessary for the particular purpose.



- We only use information for commercial purposes if the customer has consented to this.
- We never look at the content of communications.
- If we share information with third parties, we ensure that those third parties also comply with the privacy rules.
- We inform our customers and employees accordingly.

You protect all personal data you use and handle it confidentially.

And this is how you contribute

- You use personal data only for (company) purposes identified in the KPN Privacy Statement.
- You protect all personal data that you use and treat it as confidential.
- You immediately report any suspicions you have of a data breach or misuse of personal data.

This is what we mean with personal data

Personal data includes all kinds of information that you can trace back to a natural person. Examples include contact details or data about the use of a product (for example viewing and calling behavior, system settings, financial information, information from cookies and location details).

We refer to the collating, storage, analysis and deletion of data as 'processing'.

Dealing responsibly with access and company resources

Why are we doing this?

At KPN, we protect our company property against damage, unauthorized access, and loss.

Together we take responsibility for our business premises and company property. We ensure that people without rights of access to our buildings do not enter. And we keep a close eye on our own company resources and those of our colleagues, to prevent them from getting damaged or going missing.

Company resources

Company resources include all items we supply to you to enable you to perform your work – including means of access and access authorizations. We lend these to you; which means that they will always belong to KPN. Unless we explicitly state otherwise. In addition, all equipment and resources available in the building that are not issued to you personally, are company resources. As are the buildings themselves.

This is what KPN does

- We ensure that you are given all company resources that you need to be able to perform your work.
- We register all company resources so that we can identify the whereabouts as best as possible. This includes means of access and access authorizations.
- We provide information and training to enable you to use and protect company resources as well as possible.

And this is how you contribute

- You take good care of your belongings and protect them against misuse, damage, loss or unauthorized use. Do not leave these items unattended, secure them with locks and let no one else watch or listen in, whether at work, at home, or whilst traveling.
- You use your laptop and mobile phone for work, and as little as possible for private use.
- You report any loss or damage as soon as possible, and also report it if anyone has gained unauthorized access to your belongings.
- Your KPN Company Card and other means of access are strictly personal. Ensure that during work you always have them with you, so that you can prove that you work for KPN and that you treat them with care. This means that you do not lend them to colleagues or anyone else.
- You register the arrival of your visitors and escort them through the building during their visit.



Dealing responsibly with our digital security

Why are we doing this?

At KPN, we protect our information and systems effectively.

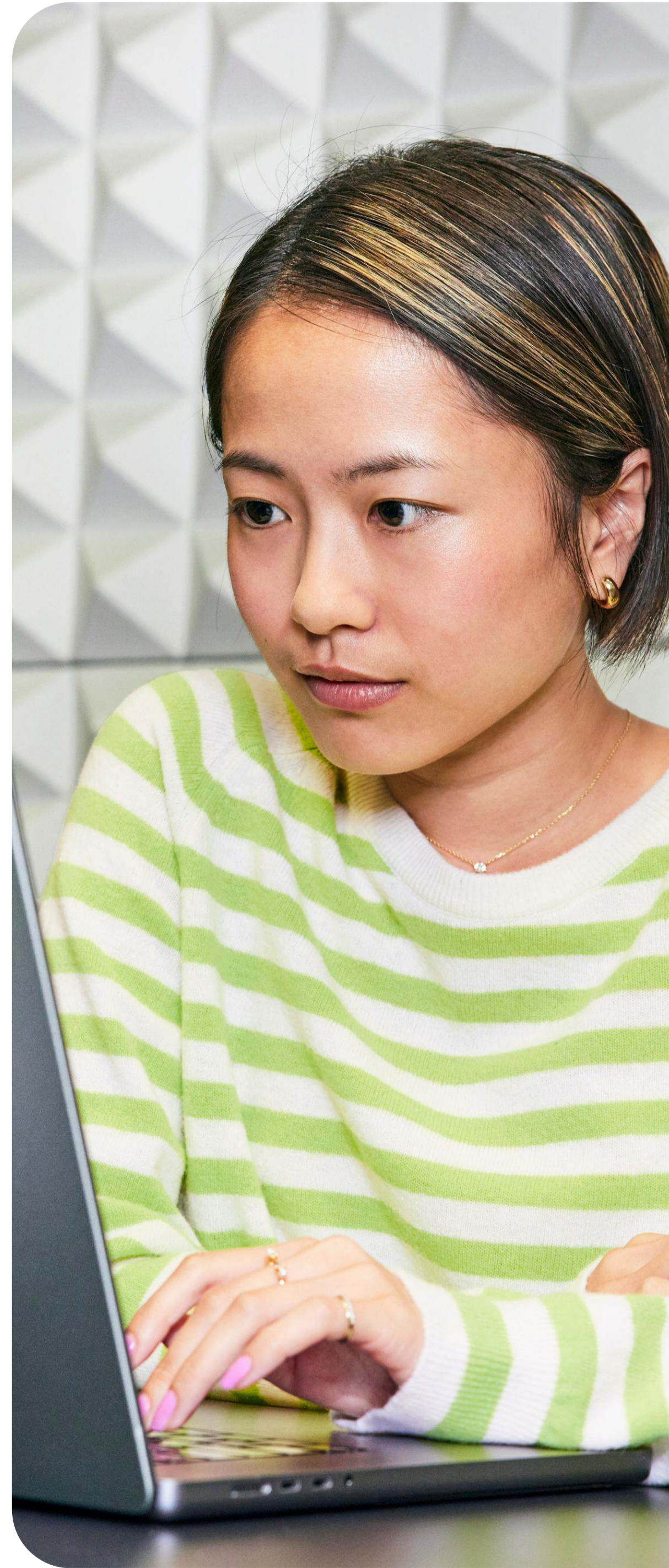
We are jointly responsible for protecting our information and systems. We take measures that are necessary to detect, identify, and combat threats. For example, if someone obtains access without authorization. Or if information and systems are incorrectly changed or become broken or lost. By acting sensibly, we avoid unsafe situations.

This is what KPN does

- We have clear policy rules on digital security.
- We take measures to detect, identify, and combat threats, and to prevent the harmful consequences of these threats.
- We ensure that you are properly informed about the policy rules and where you can find these.
- We provide information and training as to what digital security is and how it affects you.

And this is how you contribute

- You are familiar with our policy rules on digital security (data security) and know where to find them.
- You do not respond to any phishing - for example, a suspect email – and instead send this as an attachment to the Helpdesk Security, Compliance & Integrity, or use the report button in Outlook.
- You prevent the operation of the KPN network from being affected. For example:
 - You do not download any software that breaches systems (viruses, spam, etc.).
 - You only download and send large (software) files using our own software or encryption.
 - You do not send any email to large groups of recipients without first contacting the Corporate Communications Team.
- You deal correctly with digital company property and do not visit any degrading, offensive or illegal websites.
- You correspond in a collegial and respectful manner. Avoid communications on controversial or offensive topics. Do not share or display any images or other materials that could be regarded as being offensive.
- You do not change the configuration or design of the software in the workplace. Do not install any software that is not approved by KPN.
- You report any incident as quickly as possible. For example, if anyone has obtained unauthorized access to your company resources or to our information or systems.



Dealing responsibly with data

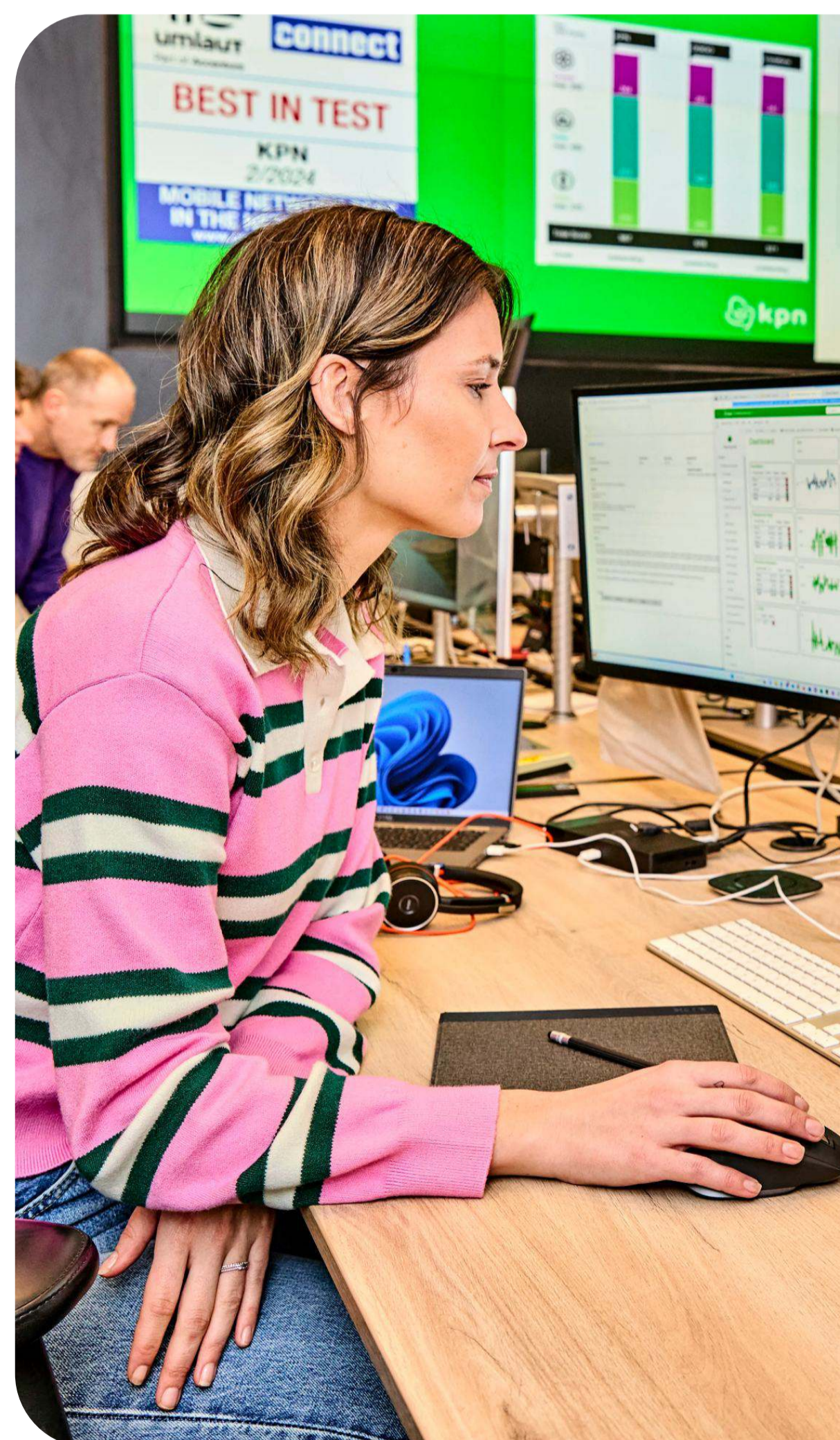
Why are we doing this?

At KPN, we deal responsibly with our data.

Customers and KPN employees should feel secure and able to trust us. Certainly with regard to their data. We use this data for reports, decisions, automatization, and providing the best customer experience. It is therefore important that all of us comply with the data rules.

This is what KPN does

- We have clear policy rules on creating, managing, sharing and using data.
- We have clear processes and standards concerning the quality of the data.
- We ensure that all employees are properly informed about the sharing of data in the correct way.
- We classify information in the following categories: 'Public', 'For Internal Use,' 'Confidential,' or 'Secret.'



And this is how you contribute

- You comply with the KPN Data Policy.
- You only use the data that you need for your stated purpose.
- You act transparently in creating, managing, sharing, and using data, and apply ethical considerations in these tasks.
- You input data carefully.
- You ensure that the data you use is correctly classified and protect that data in accordance with the relevant rules. This means that you prevent anyone being able to have unauthorized access to classified information, that you restrict the group of recipients, and that you comply with the security measures in the KPN Security Policy relating to the classification of information.

Classifications

KPN has information that not everyone, not even every KPN employee, may have access to. To simplify the protection of information, we divide the information into the following classifications:

- **Public (unclassified):** information that may be available within and outside KPN, such as leaflets, product descriptions, and published annual reports
- **For internal use:** information that should only be available within KPN, such as work orders or technical documentation
- **Confidential:** information that is available to a restricted group of recipients, such as personal data of employees and customers, or departmental plans
- **Secret:** information that is available to a very small group, such as financial figures not yet published

The purpose of classifying information is so that everyone at KPN knows how to deal with information and how and with whom they are permitted to share it.

Responsible use of AI

Why are we doing this?

At KPN, we use AI wisely. For our customers, for colleagues and for society.

AI (artificial intelligence) plays an important role in the digitalization of our work. It helps simplify and improve our business processes. And helps us grow as a company. At the same time, we remain conscious of the risks and ethical challenges posed by AI.



This is what KPN does

- We focus our AI strategy on the utilization of responsible AI applications, in an ethical manner.
- We ensure that our AI-models are justified, explainable and fair.
- We have formulated values for the responsible application of AI within KPN – and comply with these.
- We use an AI governance framework in which roles, responsibilities and processes are recorded.
- We test all potential AI applications against the formulated values before they are used.
- As users, we know how to deal with the output because the AI applications we use are explainable.
- We work together with stakeholders – including customers, partners, and research institutes - to ensure that we utilize AI in an ethical and socially-relevant way.

KPN values for responsible AI

Impact on society

Our customers can be sure that we take the impact of our AI applications on society seriously.

Human centric

We develop and utilize human-centric AI, in which the employee is the center of focus and the AI system is in a support role.

Transparent

We implement AI systems in a transparent way. We also decide per application what explanation is required.

Inclusive and honest

When developing or procuring AI systems, individuals' privacy and autonomy come first. We do not tolerate discrimination. And we do not permit our AI systems to discriminate.

Robust

We select AI systems that are robust. They may not make incorrect decisions or easily break down.

Compliant

KPN employees comply with the law and a strong internal policy. We have developed additional policies specifically for AI. We take a proactive approach and go beyond what is required by laws and regulations.

And this is how you contribute

- You use AI only for support, and never as a substitute, and remain critical and proactive yourself.
- You report any doubt you may have about whether an AI application is in line with the KPN values for responsible AI.
- You only use the AI tools that we provide in your workplace and/or department.
- You never use internal, confidential, or secret KPN information in public AI tools.

AI Governance

AI Governance is the process of developing, implementing, and enforcing quality standards for the development and use of AI. It is a continuous learning process. KPN's governance framework provides consistent procedures whilst offering scope for flexibility. Retaining sufficient control requires a strong combination of trained employees, processes, and technology.

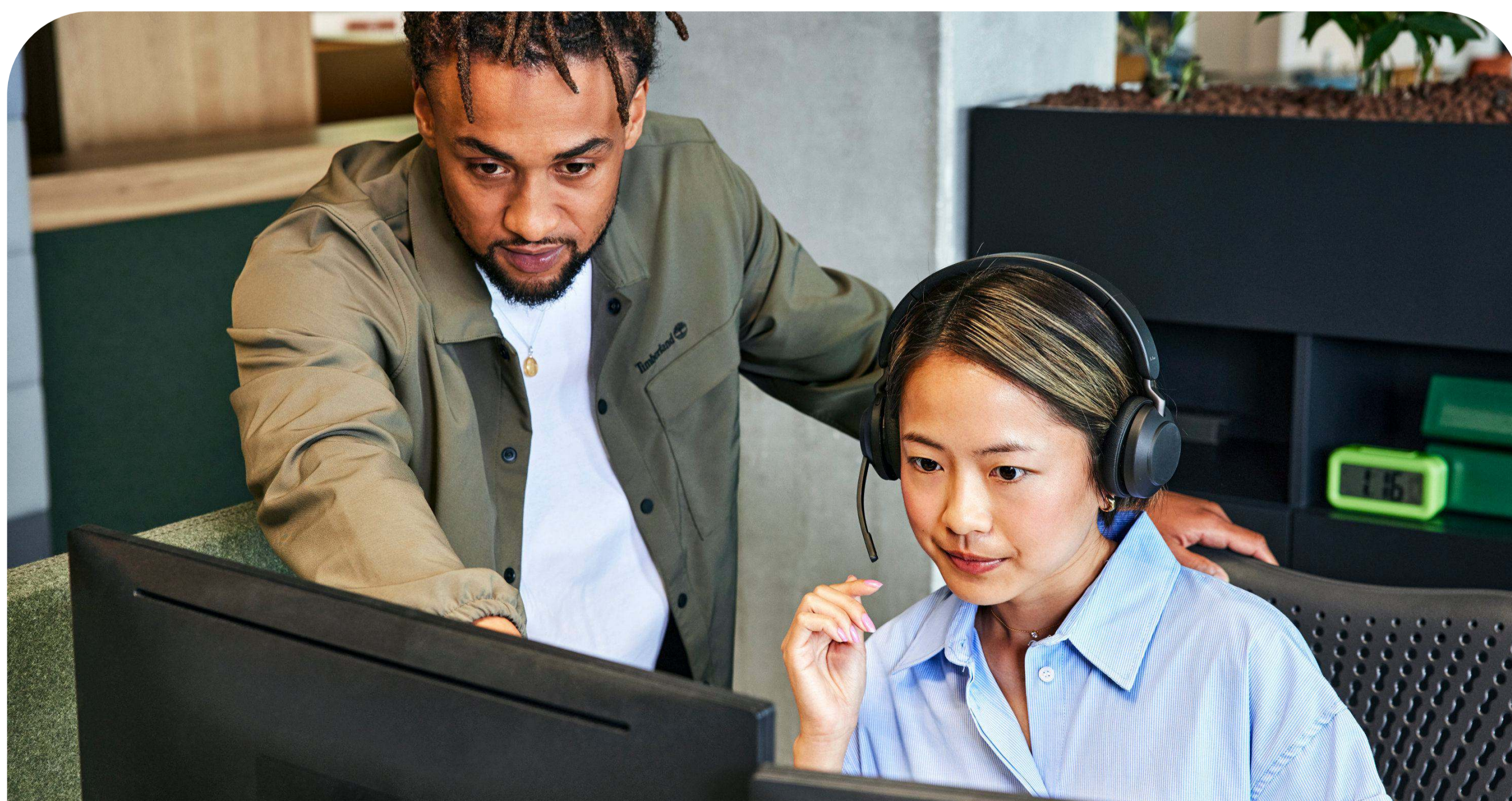
The AI Governance framework helps at each stage of the development process of an AI system. We use applications to manage and monitor a system, and intervene where necessary. Documentation and measurements contribute to transparency, also in respect of ethical considerations. We make a record of models in a register. We discuss any new AI applications within a multidisciplinary internal advisory body on the basis of our values for responsible AI.

Reliable records and reporting

Why are we doing this?

At KPN, we only share information that is accurate. Our shareholders and other parties can trust it.

We are a listed company. We share information with our shareholders, supervisors, and other parties. We do this, for example, by means of our annual report. It includes information about our activities, our management, our financial situation, and sustainability. It is important that this information is always complete, reliable, in time, and verifiable. What if we share incorrect information? This would adversely affect our reputation and the value of our business. And it could lead to penalties.



This is what KPN does

- We ensure that our records are correct, drawn up in time, and complete, so that they contain all relevant information.
- We conduct processes and procedures that regulate who may approve a transaction and how this must be recorded in the records.
- We provide honest, accurate and comprehensible financial and other information.
- We engage an external accountant to check our information before it is published.
- We do not participate in tax structures that have no commercial or operational relevance and we do not use tax havens.

And this is how you contribute

- You ensure that contracts are approved by the right persons and that all information is recorded carefully, in time, and in full in the records.
- You always comply with the procedures and processes applying to financial and other records.
- You check whether the invoices we receive and send out are accurate and complete.
- You ensure that invoices and purchase orders are recorded against the correct costs category. If in doubt, consult an internal specialist.
- You only declare costs and expenses in accordance with the relevant rules.
- You work transparently and openly with internal or external auditors.
- You apply a critical approach to issuing payment orders and report any unusual requests or transactions.



Communications and society

Internal and external communications in the KPN way

Why are we doing this?

At KPN, we communicate carefully, both internally and externally.

We are right behind our customers. We are their digital partner. With that comes a strong and sympathetic appearance. This is reflected in our branding: the way in which we communicate in word and image. As a KPN employee you are our company's business card. The way you communicate contributes to the way that people see us. Including on social media.

This is what KPN does

- We offer our customers security, convenience, attention and progress. We call these the KPN Experience principles.
- We commit as a sponsor to sporting, cultural and social organizations in the Netherlands that share the same underlying principles.



And this is how you contribute

- **You actively promote the KPN brand style**

You can find everything you need for this on the brand portal. From logos to photography, from typography to language, and from email signatures to Teams backgrounds.

- **You treat our customers in line with the KPN Experience principles**

Everything we do is customer driven. For this reason we have drawn up a list of simple but important rules of conduct, based on security, convenience, attention, and progress (the KPN Experience principles).

- **You transfer media requests to the Media Team**

If you are approached by the press for an interview, official statement, or positions taken by KPN? Refer such requests on to your colleagues at Media Relations.

- **You follow our rules for speakers at external events**

KPN is often asked to provide a speaker. It is important that this presents a clear and consistent image of KPN. You can find the guidelines in the explanatory document 'Speaking as a KPN employee at external events'.

- **You comply with our rules for communications about collaborations**

Suppliers like to use KPN as a reference. Partners sometimes wish to disclose information about a collaboration to a wider public. We are also regularly asked to give positive quotes about a partner in trade magazines or other communications. In principle we do not agree to these requests. You can find the rules in the explanatory document 'Suppliers Communications'.

- **You are KPN's business card on social media**

We appreciate you sharing your enthusiasm about KPN. Please be careful however what you share on social media. Your behavior on social media can be directly or indirectly linked to your work at KPN. Be aware that posting negative messages (such as hurtful, inflammatory or hateful statements) can also have an impact on KPN. You ensure that no reason is given for this.

- **You behave professionally and respectfully on our internal channels**

You contribute to a positive working environment with appropriate language and behavior on our internal channels (such as TeamKPN and Teams). You use these channels for business purposes, and only share relevant and useful information and do not advertise. You can find further explanation in the Rules for TeamKPN.

Sharing Information

Sometimes the sharing of information can be harmful to our customers, colleagues or business operations. For example, information spread via social media, the press, or private conversations. Be aware of this. Keep information about KPN to yourself. Even if you no longer work for KPN.

ESG: #BetterInternet

Why are we doing this?

**At KPN, we have a position at the center of society.
We take responsibility, are inclusive and sustainable.**

Every day we make the internet better. Safer, more social, and greener. So that everyone can join in.



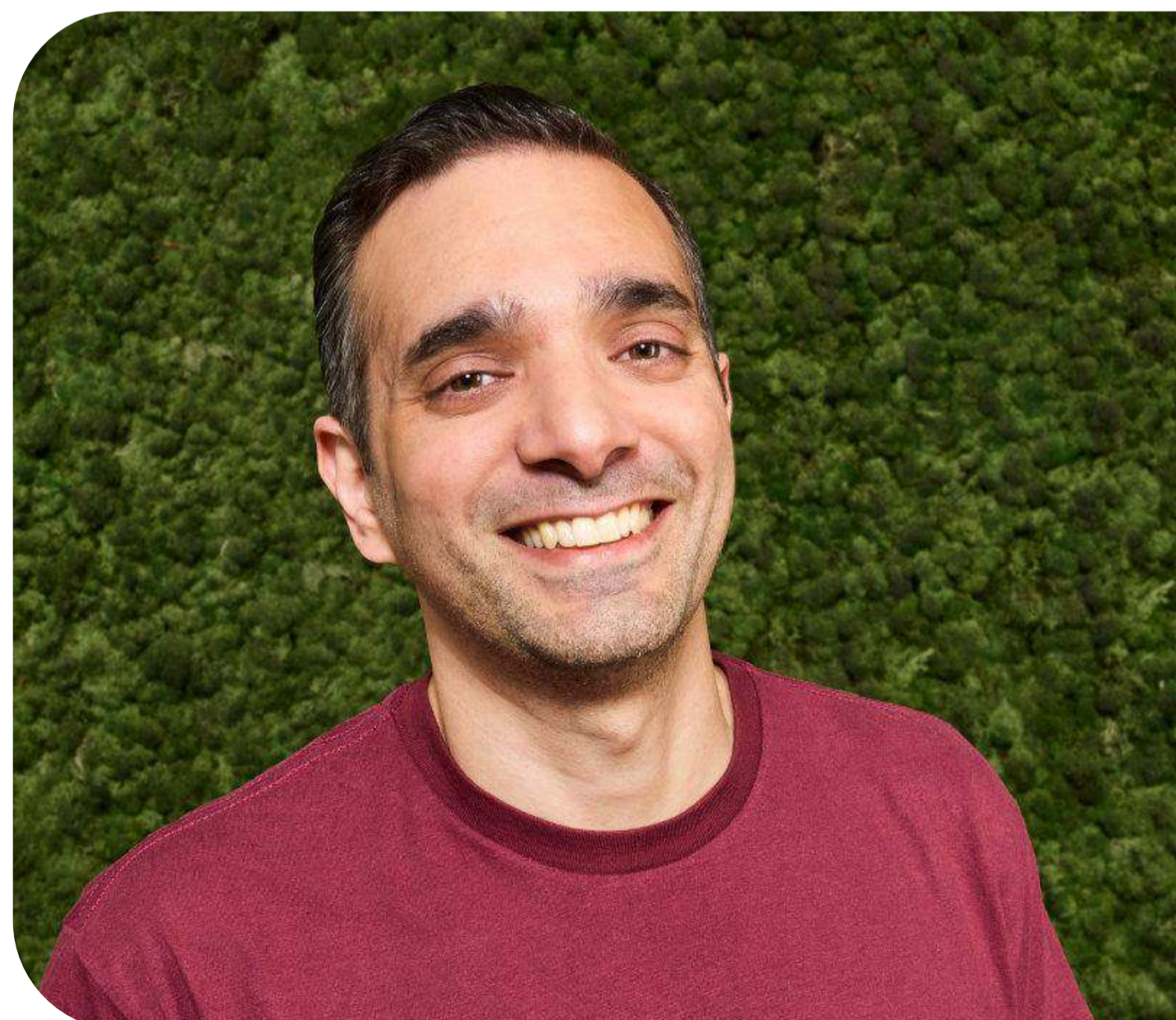
The standards we set for ourselves, we also set for our partners. We critically assess their impact on the environment, the working conditions of their staff, and their business practices.

This is what KPN does

- We have made ESG an integral part of our strategy. We continually look at where we can make improvements. In our own organization as well as for our customers and for society.
- We focus our ESG strategy on three pillars: Responsibility, Inclusivity, and Sustainability.
- The standards we set for ourselves we also set for our partners. We critically assess their impact on the environment, the working conditions of their staff and the business practices.
- Since 2007, the KPN Mooiste Contact Fonds has been bringing people who feel lonely in contact with the world around them. All KPN employees can volunteer to help.

And this is how you contribute

- You think about ways - big and small - to make your own work more sustainable.
- You discuss with your manager or the Sustainability Team if you see any scope for improvement in the area of responsibility, inclusivity, or sustainability.



Human rights

Why are we doing this?

At KPN, we respect and protect human rights.

We have a position at the center of society. We therefore see it as our responsibility to respect and protect human rights. Within our company and with everyone with whom we collaborate. We do this for our employees and our customers. Within our value chain. And for society in general.

This is what KPN does

- We respect and protect the human rights described by the Universal Declaration of Human Rights.
- We comply of course with all national and international human rights laws.
- In our 'KPN Code on Human Rights' we identify 4 groups of stakeholders: our employees, our customers, our value chain, and society. For each of these groups we have identified our responsibilities and activities.

And this is how you contribute

- You keep a close look out for alarming working situations or suspicious conduct with regard to human rights, including signals from the value chain, in the Netherlands and abroad.
- You Speak up if you see or hear anything that causes you concern.



Speak up!

Having concerns. Need for advice. Or if you want to report something.

We place great importance on honesty, transparency and integrity. There's no room for big egos. Working at KPN is a team sport, not a solo act. Underlying this is a safe working environment, and space to be yourself.

Rules are also there for a reason. Sometimes rules are broken. Have you noticed something that is not ok? Do you have any questions about this? Is there anything you are concerned about? Or has anything happened that makes you feel uncomfortable? You should discuss such things with your manager. What if you don't want to do this, or can't do this, because, for example, the issue is about your manager? You should then contact a [confidential advisor](#) or the Helpdesk Security, Compliance & Integrity for a conversation without obligation.

Would you prefer to report something straight away? You can do this too. The sooner the better. So that we can respond quickly. We set out the various options below.



KPN Helpdesk Security, Compliance & Integrity

For internal use only

KPN Speakup Line

If you want to report
(anonymously)

0800-022 29 31

Report (anonymously) online

Use code: 57660

A private meeting

If you can't or don't want to report something in this way, you can request a private meeting with the KPN Helpdesk.

Do you want more information about how to report something?

Check the [Reporting procedure](#) or [Speak Up! on TeamKPN](#).

What happens once you have reported something?

What if we suspect that the person(s) whom you have reported have broken the rules? Then we will investigate. The investigation will be done by the KPN Corporate Security Office. For this purpose they follow the [Protocol for Integrity Investigations](#).

Privacy and your position once you make a report

We want everyone to feel free to report misconduct or inappropriate behavior. Even if you only have a suspicion. You should be able to report something without fear of punishment, threats, or other negative consequences.

Internal report

With each internal report and the processing of such report we comply with our [privacy statement for employees](#).

Anonymous reports

Are you reporting something via the KPN SpeakUp Line? If so, the report goes via an external organization. This means we don't have access to your details. And so you remain anonymous. What if you want to make yourself known? Then the privacy rules that apply are the same as those for an internal report.

For more information about privacy see [Article 7 of our reporting procedure](#) or check [TeamKPN](#).

How making a report affects your position

You should feel safe when reporting something. That's why we protect you. For example, you cannot suffer any disadvantage due to making a report. To find out how this works, see [Article 8 of our reporting procedure](#).



