



ALBtelecom Code of Business Ethics





This documents is the Code of Bussiness Ethics of ALBtelecom sh.a.

ALBtelecom CODE OF BUSINESS ETHICS is an overview of fundamental company policies and regulations guiding our relationship with each other and with our stakeholders.

Further details and additional rules for ALBtelecom employees in specific areas of operations are found in the respective Company Documents

The Company Documents may be found at the intranet page:

<http://companydocuments/default.aspx>

¹ **Company Documents** stand for, including without limitation, procedures, policies, guides, manuals etc, whether in hardcopy and/ or softcopy that are issued from the Company and regulate specific areas or operations within the Company or outside, and /or third parties and as they may be amended and/or altered in the course of time.

1. INTRODUCTION TO THE GUIDING PRINCIPLES



The Code of Business Ethics is our guiding framework and tool to keep ALBtelecom's perception as a trusted partner, to conduct business responsibly and to remind all of us in ALBtelecom that **every action is important**. These instructions are the foundation of how ALBtelecom operates, and they help to guide us in maintaining trust and credibility with our customers, partners, employees, shareholders and other stakeholders.

By following this guiding framework we can reach properly the mission and vision of ALBtelecom in order to make communication simple in all directions and presenting innovative products to all segments we operate in.

As members of Çalık Group, we also embrace, believe and are bound by the Group core values and business principles:

Çalık Group Core Values:

1. **Fairness** - we act with a sense of justice and fairness;
2. **Ethics** - we have high moral standards;
3. **Reputation** - we keep our reputation above all else;
4. **Respect** - we see our differences as richness and reject all form of discrimination
5. **Solidarity** - we always support each other;
6. **Human Focus** - we believe success is possible and meaningful with people.

Çalık Group Business Principles:

1. **Determination** - we work hard for what we promise;
2. **Competence** - we work with competent people;
3. **Courage** - we believe in ourselves and can be assertive;
4. **Consultation** - we value different ideas;
5. **Customer Focus** - we strive to better understand our customer's need and expectations;
6. **Sense of Responsibility** - we feel responsible to uphold values of humanity, our society and company

Operating with integrity, transparency and responsibility characterizes the way ALBtelecom conducts business.

An **integrity** culture is critical to maintain trust and credibility with our customers, partners, employees, shareholders and other stakeholders. On the other side, such trust and credibility need **transparency** and **confidentiality** in how we conduct business in order to protect business assets and the privacy of individuals.

Performing through an **ethical business conduct** is a high priority for ALBtelecom. Our Code of Business Ethics is our promise to operate with honesty and truthfulness in our dealings with and communication to the market.

We expect that everyone, from the members of the Administration Board to each individual working at and for ALBtelecom, will be held accountable for meeting these standards and will operate in accordance with the principles set forth in this Code. This Code is equally applied to consultants and individuals whose work is the functional equivalent of that performed by company employees such as subcontractors and private contract workers.

Being part of ALBtelecom requires that each and every individual accept responsibility. We are aware that every single incident of misconduct can damage not only our success as individuals, but also the reputation of ALBtelecom and of the Calik Holding Group we are part of. Therefore, each and every individual shall commit in adhering to this Code of Business Ethics by contributing to Company's **commitment to conducting business responsibly** including:

- Being responsible corporate citizens;
- Respecting human rights;
- Ensuring health and safety;
- Encouraging sustainable development.

This Code also contains rules and guidelines for:

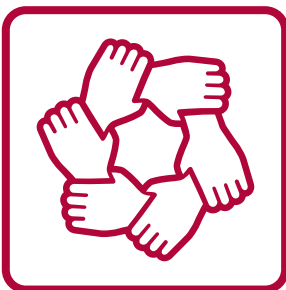
- Ensuring compliance at all times with applicable laws, rules and regulations;
- Conflicts of interest;
- Protecting and properly using the company assets;
- Protecting information;
- External communication;
- Seeking guidance and reporting.

2. ALBtelecom COMMITMENT TO CONDUCT BUSINESS RESPONSIBLY



ALBtelecom aims to deliver products and services that aligns with its **mission to combine technology and lifestyle**, to make people's life enriched and easier. One key element in order to reach this mission is to operate responsibly in the best interest of the Company wherever we do business and to maintain the trust of the society, customers and other stakeholders.

2.1 Our obligation as responsible corporate citizens in the community



It is important to behave in a socially and ethically responsible way and by believing in this principle we commit to be responsible citizens in the community we conduct business. We give importance to listening to concerns that the community (including our customers) may have, for example in relation to network expansion, environmental issues, anti-corruption etc. We tend to be inclusive and seek answers to the questions the community may raise and we will do our best to make sure everyone's concern is taken into account.

It is very important that ALBtelecom and Eagle Mobile brands to be always associated with the respect for human rights, environmental protection, fair and safe working conditions.

This principle forms the basis of our approach to conducting business responsibly.

2.2 Respecting human rights

We have the responsibility to **respect human rights throughout all our business operations**. In each business operation or relationship we work to ensure that we are not complicit in any human right abuses and we always seek ways to honor and apply the principles of human rights.

2.3 Ensuring health and safety



We expect everyone at ALBtelecom to behave in a safe and responsible manner at all times in order to maintain a strong occupational health and safety culture. We commit into this principle by promoting awareness, prevention measures and care.

Such behavior is required for everyone we work together with in ALBtelecom such as customers, suppliers, our subcontractors and other stakeholders. Only in this way we are ensuring a safe and healthy working environment. This commitment is strongly supported and demonstrated by a whole **Occupational Health & Safety System** of documented management controls and by taking necessary actions in regard. We act as a responsible employer by protecting the life and health of every one working for ALBtelecom and by protecting the commercial interest and brand of ALBtelecom and Eagle Mobile.

2.4 Encouraging sustainable development



ALBtelecom is committed to developing and offering products, services and solutions with excellent sustainability development, which is the development process for meeting human development goals while maintaining the ability of natural systems to continue to provide the natural resources and ecosystem services upon which the economy and society depend. We encourage sustainability, as a long term social benefit, economic prosperity possibility and a possibility for improved environmental performance. In this framework, we will continuously work to minimize negative impacts of our business operations and maximize the positive impacts for better sustainable development of society. We will increase the sustainability awareness among employees and we will engage with stakeholders in possible activities that have positive economic, social and environmental impact on community, business, and society. We also push our suppliers to engage to such sustainability standards. As part of ALBtelecom we must all be aware of the environmental concerns relating to our job activities and adhere to environmental compliance guidelines affecting our work.

If you suspect a violation of any of the issues raised in the environment, health and safety and human rights, you should report it in the contacts provided in Section 8 below.

3. COMPLIANCE WITH LAWS, REGULATIONS, COMPANY RULES, AND STANDARDS



Legal and Regulatory Framework, Standards - ALBtelecom is committed to respecting all legal and regulatory framework, standards and principles that apply to its business, either national or international. Therefore, it is under your responsibility (employees and others to whom this Code applies to) to work and perform business activities in complete accordance with the legislation in force of the Republic of Albania or with other applicable international laws and standards that our company may be subject to. Violations of any applicable law or regulation may have serious consequences both for ALBtelecom and for the individuals concerned.

Company Rules and Regulations - We also consider our Company policies, procedures and regulations to be important tools for conducting business in a proper way, as well as for behaving in ethically acceptable manners. All employees must read and respect every policy and procedure/regulation set by the Company. These policies/procedures/regulations are subject to changes/updates according to the needs of the company, therefore every employee should make sure to follow any changes published via internal communication and/or published in our intranet page under the **"Company Documents"** section. A structured **Quality Management System** in ALBtelecom ensures that each one of you is properly trained and aware of the company documentations that covers every operation being done in ALBtelecom.

Protection of Personal Information - ALBtelecom is committed to protecting the privacy of personal information including personal information related to customers, employees, business partners or external workforce. We follow respective laws and regulations related to the protection of personal information. When you are involved with accessing or processing personal information in your assigned business operations in ALBtelecom, you shall be aware and comply with respective applicable legal and contractual requirements.

Accounting and Financial Reporting - ALBtelecom is committed to following strict accounting principles and standards to report financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with applicable laws and regulations requirements. As part of ALBtelecom and as part of this commitment you must give support to the company in this area.

Competition - Fair and open competition is the basis for business development and innovation for ALBtelecom, thus everyone working for ALBtelecom shall perform their work and behave vigorously and constructively by complying with the applicable competition laws.

Under this framework, special attention is given regarding the protection of open and free competition in all of our business agreements and dealings with third parties, especially for agreements with competitors or business partners. Dissemination of false information about competitors and industrial espionage are strictly forbidden. By believing in fair and open competition, everyone working for ALBtelecom shall never seek, accept or discuss confidential or even "inside information" (non-public information) of ALBtelecom with competitors or other non-authorized parties.

In case of any uncertainty in relation to legal and regulatory framework, please feel free to address your concern at our Legal, Regulation and Competition Group for any advice/help.

4.CONFLICTS OF INTERESTS



We all should make business decisions based on the best interests of ALBtelecom rather than personal considerations and relationships. A conflict of interest arises when anything affects or influences the exercise of our independent judgment in the best interest of ALBtelecom. In order to do business in an ethical way and to comply with this Code, we all must avoid situations than can lead our personal interest to conflict or even appear to conflict with the interests of ALBtelecom.

Examples of conflicts of interest include but are not limited to the following:

Other employment and business relations - You must not take any employment outside ALBtelecom with or without compensation that harms or may harm your job performance at ALBtelecom or create / may create a conflict of interest.

ALBtelecom employees shall not engage in outside business interests that divert time and attention away from ALBtelecom assigned responsibilities or require work during officially working hours in ALBtelecom.

Second employment from a customer, supplier or competitor of the Company is strictly forbidden.

Providing work or having business relations on behalf of the Company to another business in which you have a personal financial interest is also considered as a conflict of interest and is also forbidden. Using business opportunities for yourself that are identified within your duties/ responsibilities in ALBtelecom may lead to situations in contrary to the interest of ALBtelecom. Under this framework, using such business opportunities may lead to using ALBtelecom property, proprietary information, or your position for personal gain.

Having financial interests or business relations in a business which is a competitor, contractor or supplier to our Company is also considered as conflict of interest and as

such it is prohibited.

In case you believe that your requested double employment does not belong in any of the above situations, then you should ask approval from ALBtelecom Human Resources Division by following the related internal policies and procedures of the Company and then upon approval you may proceed giving your contribution for another second workplace.

Relatives' employment - ALBtelecom recognizes the fact that hiring members of the same family, especially in the same team or division, may lead to a conflict of interest. In order to prevent such situations arising, we do not hire relatives of current employees. Persons who are first-degree relatives with each other may not be employed in the same company. For a contrary practice, approval should be obtained from top management after the evaluation of valid reasons.

Political involvement - Anyone working for ALBtelecom is prohibited from making direct or indirect political contributions and supporting any political party, candidate or cause on behalf of the Company. Using ALBtelecom resources such as time, equipment, monetary support, property or branding for political activities could cause conflict of interest and thus shall be avoided. Any employee may engage in political action or political activities on personal time before and after work, holidays and during approved leave.

Private use of company property - In order to prevent conflicts of interests, everyone working for ALBtelecom is not allowed to make private use of Company assets or materials, unless otherwise stated in the individual rights in collective agreements, individual agreements or according to internal Company procedures and regulations.

Disclosure of conflicts of interests - ALBtelecom requires that you disclose transactions or situations that would be expected to give rise to a conflict of interest. After disclosure to Human Resources Division, Legal Affairs Division and Corporate Performance & Projects you will be told whether there is a conflict of interest and if so, how best to address it.

5. PROTECTING AND PROPERLY USING THE COMPANY ASSETS



Any type of asset that is under the property of ALBtelecom can be important so that the company can operate properly. Such assets can be physical assets, IT resources or even intellectual property assets in the form of inventions, trade secrets, ideas, etc. Each of these can also contain proprietary information of ALBtelecom.

Proprietary information of the Company is held with the strictest confidence and is not disclosed, used, lectured upon or published unless such disclosure, use or publication is required in your work duties for the company or an Executive Officer of the company expressly authorizes such thing in written.

Each one of you is responsible for protecting ALBtelecom property entrusted to you and is

also responsible for helping to protect all company assets in general. In order to properly do this you shall be aware of all internal information security policies and procedures and report any loss, or risk of loss of ALBtelecom property as soon as you notice them. It is the responsibility of each employee of ALBtelecom to adhere to policies of ALBtelecom related to information security and to comply with the individual Confidentiality Agreement

Use of ALBtelecom IT resources - ALBtelecom IT resources including communication systems, IT equipment and connections to the internet, shall be used only for conducting ALBtelecom business operations or for other purposes authorized by the top management or by company respective internal procedures. The company provides all necessary equipment for the employees to perform their work and therefore you cannot bring personal computers at the workplace and moreover cannot connect them to the company's network or systems, unless allowed by the company to act so. In case personal devices are brought to the workplace, then the company reserves the right to inspect such device. Unacceptable use of Albtelcom IT resources includes: processing, sending, retrieving, accessing, displaying, storing, printing or otherwise disseminating material and information that is confidential, fraudulent, harassing, threatening, illegal, racial, intimidating, defamatory or otherwise inconsistent with a professional environment.

When your work relation is terminated - You must return all Company assets at your disposal, including here all the company proprietary information that is at your disposal by complying with the Confidentiality Agreement. You remain bound by the restrictions for use and disclosure of ALBtelecom proprietary information even after you leave ALBtelecom.

¹ **Confidentiality Agreement** is an agreement the employee signs when employed in ALBtelecom that regulates the use and protection of the confidential information of the Company from the employee.

6.PROTECTING INFORMATION



We should all cooperate so that our information is not disclosed to unauthorized people. It is the duty of each and every one of us to protect ALBtelecom information assets and also that of our customers, investors, partners and suppliers. Maintaining information security may have a significant influence on ALBtelecom's success and on its image in the market. Therefore, we have established a well-structured **Information Security Management System** with all suitable and appropriate technical and organizational means in order to prevent loss, unauthorized access, unauthorized change and deletion to company information assets, clients or third parties information assets.

ALBtelecom **is committed** to work closely with our customers, employees, stakeholders and regulatory bodies in order to develop and improve this system. As part of this commitment, we aim to:

- Use training and communication to all employees to ensure proper Information Security Management awareness;
- Establish Information Security culture in ALBtelecom as a long-term commitment;
- Ensure proper security, confidentiality, integrity and availability of the information;
- Safeguard security of our information assets through effective business continuity management;
- Ensure that all information security breaches and incidents are reported and properly followed;
- Ensure that we understand and comply with the relevant legal and regulatory information security requirements;

7. EXTERNAL COMMUNICATION



7.1 Communication with media and third parties out of the Company



ALBtelecom aims to achieve high communication standards by giving true and verified information by its assigned representatives in an acceptable and understandable way to the receivers of information (interested parties). Our company answers all queries by interested parties related to ALBtelecom and its activities through an official stand of the company, or an authorized person for external communication. Thus, you are not authorized to communicate on behalf of the ALBtelecom unless it is in your job assigned responsibility to do so. Every

external communication information shall be approved by Public Relations Division. This Division assures timely delivery of information in case of request from external parties or in case of need identified from the Company to communicate with external parties.

7.2 Communication in Social Media



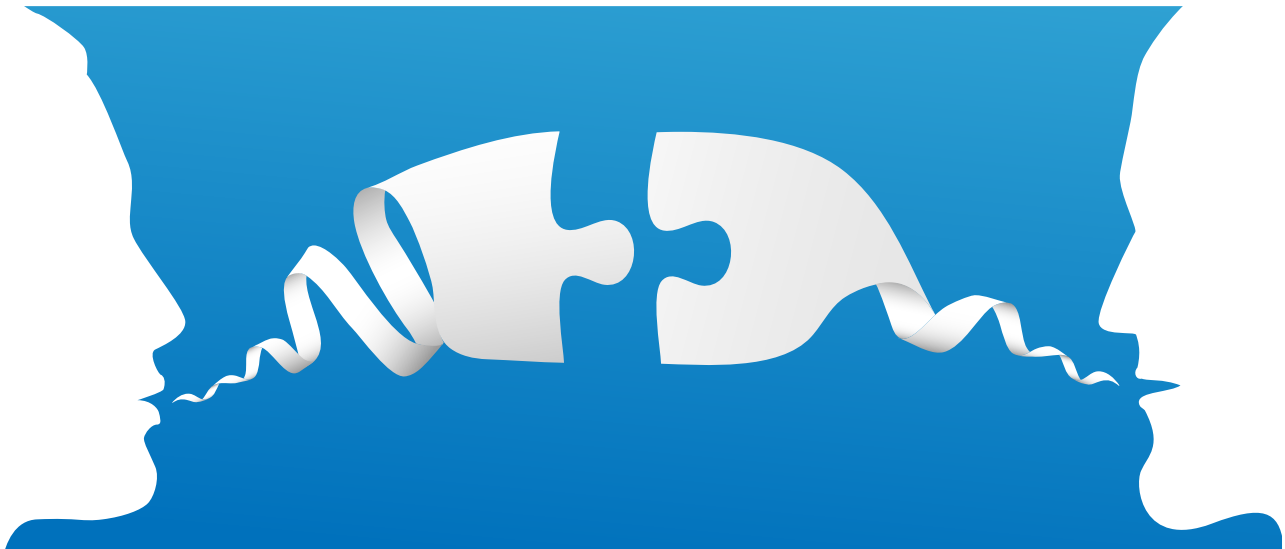
ALBtelecom Official Social Media - Every ALBtelecom social media official account contributes in the development of the company image. Managing official social media accounts such as Facebook, YouTube, LinkedIn, Twitter and Instagram etc. is done only by assigned Divisions in the Company.

Personal Use of Social Media - We respect the right of employees to use private social media accounts, but while using your private social media account for mentioning

ALBtelecom related information you should take consideration that every one of you is the ambassador of our Company image and brand. Thus we expect everyone to be

professional, keep confidentiality and make no statements that could be miss interpreted and could have a negative impact on ALBtelecom. Each one of you is responsible to ensure that our use of social media is consistent with this Code, company principles and Information Security Policy. We must always remember that what we say and how we say it can impact how the Company is perceived.

8. SEEKING GUIDANCE AND REPORTING



By sharing your questions and reporting your concerns and/or breaches to this Code, we may uphold the Albtelcom Values and our Company's commitment to integrity, honesty and ethical business. In addition, we contribute to our shared business ethical culture and allow any actual problems to be dealt with before they become major issues for our Company. By speaking up, we commit to constantly improve the way in which we conduct our business. If you wish to report a violation, raise a question or concern, you are encouraged to:

- Speak and report to your superiors;
- Report and consult with the Legal Affairs Division, Human Resources Division and/or Corporate Performance Team;
- Report the case by email reporting.violations@albtelecom.al ;
- Report the case officially by post at the official address of ALBtelecom:

ALBtelecom & Eagle Mobile
Autostrada Tirane-Durres, Km 7, Kashar