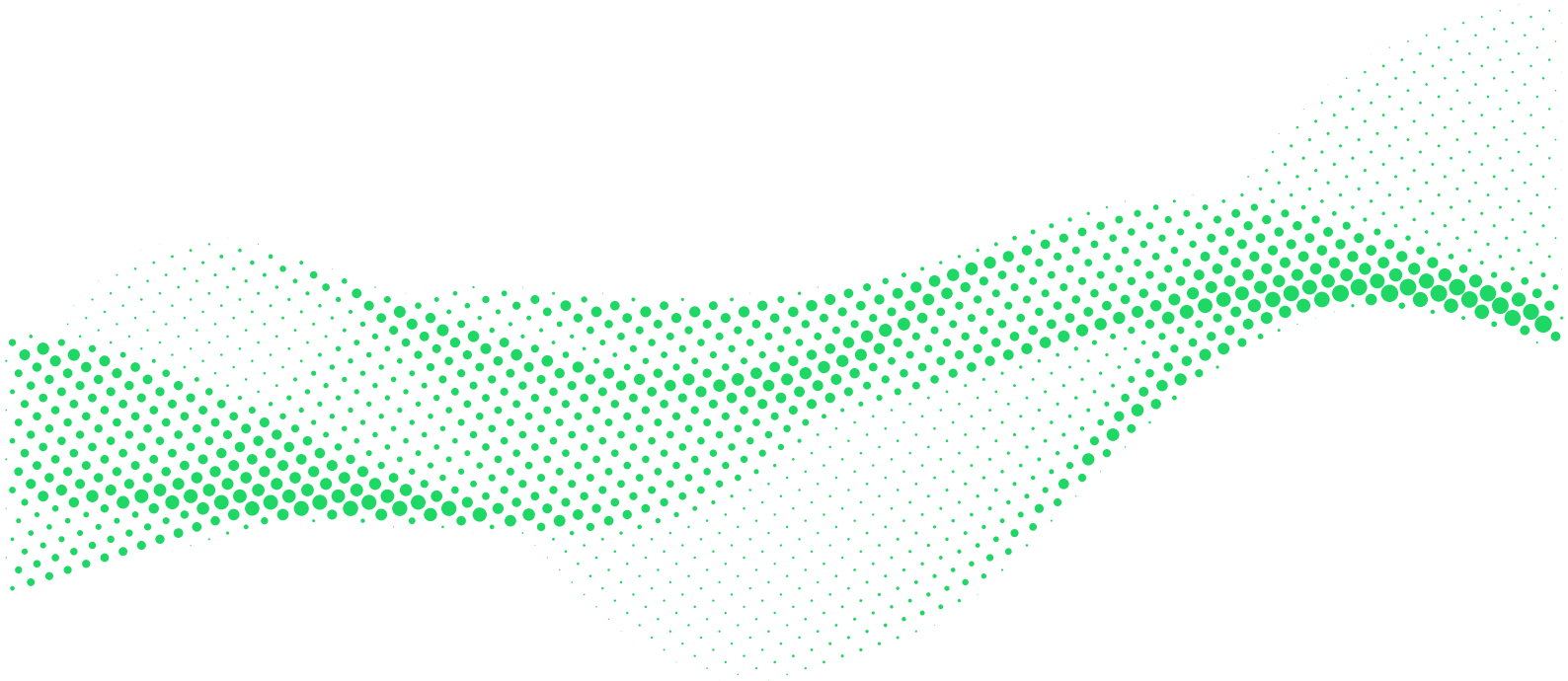


Salt Mobile SA

Social Responsibility
and Sustainability Policy



Salt.

Version

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Table of Contents

Purpose	4
Scope	4
Roles and responsibilities	4
Salt values	5
Our values	5
Guidelines governing Salt relationships with our stakeholders	5
with the consumers in general and our subscribers in particular	6
with our employees	6
with our shareholders/investors	7
with our suppliers	8
with the community	8
with our competitors	9
with the environment	9
Communication of this Policy and compliance	10
UN Sustainable Development Goals	10

Purpose

The purpose of this Policy is to provide a shared framework for our corporate responsibility goals, to define the strategy to achieve them and ultimately contribute to a more sustainable and socially conscious world.

This document includes a definition of the roles and responsibilities assigned to senior management, ensuring that we give ourselves the means to achieve our ambitions.

With this policy:

we acknowledge and recognize that through our activities, Salt does have an influence, albeit limited, on its environment and the society as a whole and that it is our duty, through an open dialogue with our stakeholders, to mitigate our negative impacts and reinforce the positive ones in order to maximize our contributions towards sustainable development and the achievement of the UN Sustainable Development Goals. we recognize the expectations of the society towards a fairer world and a clean environment. we commit to focus on the objects related to social responsibility on which we can directly make a difference or which are under our sphere of influence, and to set the related strategic actions thereof. we also identify our stakeholders and set up the guidelines according to which we do engage and conduct our dialogues with them in order to best take their interests into account.

To prepare this Policy, we used ISO 26000 as a guidance and UN Sustainable Development Goals as a compass.

Scope

The terms “we”, “our” or “Salt” are used throughout the present document to cover all of the below entities:

- Salt Mobile SA
- Salt (Liechtenstein) AG
- Salt Services SA (Portugal)
- Matterhorn Telecom SA
- Matterhorn Telecom Holding SA*

Roles and responsibilities

The role of the Board of Directors of each company under the Scope is to oversee the strategic direction of the respective company. The Management Board is in charge of the operational activities.

The designated responsible persons to supervise and manage this Policy (Sponsors) are:

- Olivier Rosenfeld (Salt Mobile SA Board of Directors)
- Franck Bernard (Salt Mobile SA Management Board)

The Sponsors are responsible for ensuring that we achieve the social responsibility and sustainability goals we have set for Salt.

Salt senior management in general commits to act with leadership and actively promote the principles described in this Policy, in particular by being role models.

Salt values

Salt aims to deliver transparent service with a strong brand identity, the highest standard of customer care, underpinned by excellent network coverage and supported by first-class distribution.

At Salt, we “walk the talk”. Reason why we take our values very seriously and try to live and breathe them in everything we do.

Our social responsibility and sustainability commitments reflect of our company Values which, in turn, shall support those commitments.

Our values

Personal

We care.
Humans, not numbers.

Original

We embrace innovations.
And adopt them with purpose.

Simple

We are straightforward.
No fuss.

Efficient

We stick to what matters.
Nothing more, nothing less.

Sincere

We never hide the truth.
Honestly.

Guidelines governing Salt relationships with our stakeholders

Based on our materiality assessment, we have identified our main stakeholders and their major requirements; we have also integrated the general expectations of the broader society with regards to each respective Core object.

We will regularly renew our materiality assessment, ensuring that this Policy is updated with the latest environmental and societal considerations.

Compliance with the law is a basic and primary component of a proper corporate governance and is essential to assume our social responsibility. We will therefore always comply with applicable law and expect our employees and suppliers to do the same. However, we acknowledge that society's expectations, which may go beyond legal obligations, are also to be considered. Especially if the law is less strict, the principles set in this Policy shall apply.

with the consumers in general and our subscribers in particular

We have placed our subscribers as a main pillar of the Salt strategy and are committed to offering all consumers high-quality and innovative products at the most attractive price.

We pay due regard to the interests and expectations of our subscribers by constantly evaluating and improving our products, services, technologies and methods.

Our commitment to putting quality and innovation to work for our subscribers is the driving force behind every product or service we design and bring to market. We understand that public concerns and demands with respect to safety and security are of paramount importance.

We treat our subscribers fairly, by offering them the most suitable product or service for their needs and addressing their feedback and grievances.

We are strongly committed to respecting individuals and their right to privacy; in particular, we will always abide by the law when it comes to personal data treatment and processing.



Core object:
Consumer Issues
UNDP 9

with our employees

@ Salt, we care for our people.

We believe in our employees' loyalty, integrity, motivation, skills and sense of initiative and accountability. We are committed to ensuring a healthy and safe workplace for everyone as specified in our Occupational Health & Safety Policy, and we work to create conditions that are conducive to developing their professional strengths and sense of individual accountability.

We also encourage knowledge sharing and the capacity to innovate. Teams are made up of people from diverse cultural and professional backgrounds. We do not tolerate harassment, nor discrimination in any shape or form, especially in hiring and promotion and work towards equal treatment of all individuals in our workforce, in particular by eliminating gender-based salary differences. We enforce procedures that enable employees to report any cases of non-compliance with our Ethics Policy that may come to their attention. In addition, we require that all such reports are investigated appropriately and with due diligence.

We champion diversity – in particular with regards to origin, race, gender, culture, age or marital status, as well as in terms of religious beliefs or support for political or trade union activity and work toward an inclusive working environment in which every individual can freely express their beliefs.

Salt contributes to Swiss youth education and supports their entry into the labour market, especially by training apprentices. Salt also supports its employees through training, enabling them to carry out their duties whilst developing their personal and professional skills.

The privacy and security of our employees is a priority for us, and we will always treat the personal data of our employees in strict accordance with the law.

We recognize the rights of our employees to collective bargaining and commit to conduct discussions in good faith.

We surpass legal compliance with regards to parental leave, accident insurance and retirement plans; when compatible with our business activities, we allow for flexible working time and place, enabling our employees to adjust their work-life balance best.

We fully recognise the positive impacts of a balanced gender representativity in our workforce and strive to maintain, respectively increase gender diversity in all our fields of expertise.



Core object:
Labour Practices
UNDP 3, 4, 5, 8

with our shareholders/investors

The Board of Directors (BoD) of Salt Mobile SA is composed of directors of both genders of diverse origins, and fields of expertise and we commit to maintain, respectively increase this diversity.

We shall also apply high governance standards in line with our internal governance regulations and recognised risk management standards.

We commit to conducting our business ethically, responsibly, and with integrity, avoiding the risks of conflict of interest.

We will not tolerate bribery nor corruption. Our Ethics Policy guides us through our combat against corruption and conflict of interest. It applies at all levels of our organisation and to suppliers through our Supplier Code of Conduct. We ensure that the Ethics Policy is widely communicated both internally and externally and understood.

We provide our shareholders and investors with intelligible, relevant and reliable information on a regular and timely basis.

Our Investor Relations team shall maintain an open and transparent dialogue with our investors and the investor community, always in compliance with the rules and regulations applicable to our listed instruments.



Core object:
Organisational and Corporate Governance
UNDP 16

with our suppliers

We are committed to fair business partnerships; we aim to treat our business partners in good faith and with respect, acknowledging that a successful partnership includes a shared vision and definition of success.

We actively build lasting relationships with suppliers and subcontractors to ensure the best possible service for our customers. We expect them to abide by ethical standards that match our own, as set out in our Supplier Code of Conduct.

Our decisions to source goods and services have an impact far beyond our own organisation; we are aware of these impacts and shall consider our full supply chain – from raw materials to product end of life- to reach our own social responsibility and sustainability objectives.

We are committed to responsible sourcing, in line with the internationally recognized standards, minimizing negative social and environmental impacts and increasing the shared value throughout the supply chain.

To this end, we have developed a Responsible Procurement Policy that sets out the due diligence process we will follow to embed social responsibility and sustainability criteria when making decisions about our supply chain.

Through a regular evaluation of our suppliers, we will ensure compliance with the requirements defined in our Supplier Code of Conduct.

Both our Responsible Procurement Policy and our Supplier Code of Conduct include an explicit reference to the Universal Declaration of Human Rights, the OECD Anti-Bribery Convention, the International Labour Organisation Conventions (notably as regards to the ban on child labour and forced or compulsory labour) and other internationally recognised human rights standards.



Core object:
Fair Supply Chain, Responsible Sourcing, Human Rights
UNDP 8, 10, 16

with the community

At Salt, we believe that business should serve the community and contribute to peace and prosperity through sustainable practices.

We also acknowledge that as a business enterprise we are responsible for respect human rights and the environment wherever we operate.

We, therefore, commit to conduct our business in strict compliance with applicable local laws and internationally recognised standards pertaining to human rights and proper governance, in particular the Universal Declaration of Human Rights, the OECD Anti-Bribery Convention, the International Labour Organisation Conventions (notably as regards to the ban on child labour and forced or compulsory labour).

We aspire to invest locally and favour locally sourced goods and services when relevant. We will continually engage in the development of a robust and resilient infrastructure, with the aim to close the social and geographic numeric gaps, as well as to support the development of the Swiss economy.



Core object:
Socially responsible business practices, community involvement and development
UNDP 8, 9, 10, 11

with our competitors

We subscribe wholeheartedly to healthy competition – a key driver of growth and innovation – which means playing fair, being honest, and winning on the strength of product and service quality. Salt also acknowledges that intellectual property rights protection is key to encouraging innovation; therefore, we commit to respect third parties’ intellectual property rights.

We adhere to our sincerity value by giving customers accurate and truthful information about our products’ quality, features, and availability.



Core object:
Fair Operating Practice
UNDP 16

with the environment

We acknowledge that although our activities have limited impact on the climate, we commit to participate actively in the global efforts to reach internationally recognised targets in terms of carbon emissions reduction.

We will actively measure and monitor our environmental performance and communicate our figures and our achievements transparently.

We strive to reduce the impact of our operational activities by implementing the latest energy-efficient solutions for our network elements and buildings and taking advantage of the technology and the efficient Swiss public transports networks to limit business travel.

We acknowledge that some of our products have tangible environmental footprint that we are committed to reducing by applying eco-design principles and the elimination of unnecessary packaging. We supplement our subscribers’ offers with refurbished equipment and put in place recycling programs for a responsible end-of-life or reuse of electronic waste.

As highlighted in our Supplier Code of Conduct, we require all our suppliers to minimise their own environmental impacts.



Core object:
Environment
UNDP 11, 12, 13, 14, 15

Communication of this Policy and compliance

This Policy is communicated to all our employees, relevant stakeholders and suppliers. It is publicly available on our website.

We ensure that all our employees know the Policy and of the related codes of conduct and encourage them to apply its principles by providing the necessary training and support. We require all relevant third parties to adhere to the principles within this Policy.

We ensure that all our employees and relevant third parties are confident that they may safely and in full confidentiality communicate their grievance and report any breach to this Policy to the Salt Ethics Advisor at whistleblowing@salt.ch. After an issue has been reported, we will work quickly to address it and if necessary take measures to prevent it from re-occurring.

UN Sustainable Development Goals

