



GCA

# Public Affairs Policy

Last review date 06/02/2023

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# 1. SUMMARY

The purpose of this policy is to define the responsibilities, principles and governance rules that apply to PROXIMUS's relations with public authorities. It also establishes the values and ethical standards to be respected when entering into contact with the public authorities. It is designed to help and guide Proximus Group employees whose activities bring them into contact with public authorities and the political world.

## 2. GROUP PUBLIC AFFAIRS (GPA)

Group Public Affairs (GPA) is an organisation bringing together all public affairs counsellors of Proximus SA and its subsidiaries. GPA manages public affairs issues/files for the Proximus Group. For issues related to subsidiaries, GPA will be represented by one of the members of the Public Affairs team. If it would be effective for the Proximus Group to apply a two-tier approach between Proximus SA and its subsidiaries in a specific public affairs file, the public affairs strategy will be defined – on a case-by-case basis – respecting all governance rules

### 2.1 Mission

Group Public Affairs (GPA) is a headquarters activity representing and defending the interests and concerns of the Proximus Group towards public authorities in their policy making process and in any kind of public affairs file. They are the bridge between Proximus Group and the Public authorities and vice versa.

Its mission is:

- To creatively and pro-actively advise, counsel and support Proximus SA and its subsidiaries in the area of public affairs, in order to optimize the surrounding business climate
- To represent and defend the interests of the company towards public authorities in their political, legislative, policy making role and towards specific interest organizations and coordinating bodies (UWE, Agoria, Voka...)
- To capture political concerns or issues and bring them towards the Company
- To achieve individual and team performance in the best interest of the company, by leveraging on networking, integrity and professionalism

### 2.2 Key accountabilities

For that purpose, GPA has the following key accountabilities:

- To consolidate and represent the company's position in matters of public affairs. This includes the organisation and co-ordination of an internal consultation and alignment process with the divisions or subsidiaries that are impacted.
- To deliver as much as possible improved business conditions, as far as those conditions are influenced by public authorities.
- To define, prepare and execute focused and effective lobbying actions, as well as to identify and target appropriate legislative and policy making authorities or lobbying organisations.

- To detect, monitor and follow-up on public affairs evolutions that may affect the company's interests, and to ensure flow-through of corresponding information to the appropriate internal stakeholders.
- To act with a single voice towards public authorities in their role of legislative, policy making or lobbying role, in order to assure coherence and consistency in representing the company's interests.

## 3. POLICY

### 3.1 Values and ethical standards

The Proximus Group must respect the highest professional and ethical standards in dealing with public authorities. This is a critical success factor for long lasting relationships based on reciprocal trust and respect. The specific values that all Proximus Group employees should comply with in their contacts with public authorities are:

When having contacts with public authorities or their representatives in the exercise of his/her professional activity, every employee of the Proximus Group:

- shall stay impartial in these contacts and balance out in a diplomatic and integer way their network/contacts to serve in the best way the company interests.
- shall have sufficient understanding of the legislative and governmental processes and shall dispose of specialised knowledge that is necessary to represent the Proximus Group in a competent and professional manner.
- is truthful in communicating with public authorities, providing actual as well as factually correct information. This includes spontaneously providing updated information to a representative, politician or a public official, if he or she is still relying upon inaccurate information.
- shall never cause or incite representatives of public authorities, politicians or public officials to violate any law, regulation or rule applicable to them.
- shall never provide financial contribution or other support to political candidates or parties for election.
- shall never offer financial inducement to any public authority, nor financial encouragement beyond official partnerships with coordinating bodies and partnerships decided by the PROXIMUS Sponsoring Committee.
- respects at all times the applicable policy rules.
- acts in a manner that shows integrity and respect for public authorities. Every representative, politician or public official is treated with respect and courtesy.

### 3.2 Governance

The governance rules within the Proximus Group shall at all times be respected. In case of non-aligned or conflicting interests between business unit/subsidiary view and the Proximus Group view, a dialogue shall be established.

*Relations with public authorities*

Relation	Responsible Public Authority	Responsible within Proximus Group
As <b>shareholder</b>	Federal Government	Secretary-General
As <b>legislative</b> or <b>policy/rule making</b> body	<ul style="list-style-type: none"> <li>Governments, Parliaments, Councils and related staff (cabinets &amp; administrations) at: <ul style="list-style-type: none"> <li>- European level</li> <li>- Federal level</li> <li>- Regional &amp; Community level</li> <li>- Provincial level</li> <li>- Local level</li> </ul> </li> <li>EU-commissioners</li> <li>Ministers at federal and regional levels</li> <li>Presidents/ Officials / members of political parties</li> </ul>	Group Public Affairs (GPA)
As <b>lobbying</b> group or <b>interest</b> group	<ul style="list-style-type: none"> <li>Officials / members of political parties</li> <li>Specific interest organisations or co-ordinating bodies</li> </ul>	Group Public Affairs (GPA)
As <b>regulator</b> of the telecom sector	<ul style="list-style-type: none"> <li>Federal administration: BIPT/IBPT</li> <li>Corresponding institutions at Community level or European level</li> </ul>	Group Regulatory Affairs
As <b>compliance body</b> on application of laws/rules (e.g., as <b>owner</b> of the public domain)	Administrations on Federal, Regional, Community, Provincial and Local level	Relevant Business Unit(s) Division(s) in accordance with Group Public Affairs (GPA)
As <b>judicial</b> body	Law courts, legal & related administrations	Group Legal Affairs
As <b>customer</b> of Proximus Group products & services	Any public authority	Related Business Units,
As <b>emergency</b> or <b>law enforcement / inspection</b> body	Emergency services, army, police, state security, technical & medical inspection, foreign agencies, environmental police	<ul style="list-style-type: none"> <li>Corporate Prevention &amp; Protection</li> <li>Investigations</li> <li>Business Continuity Planning for “disaster plans”</li> </ul>

### 3.3 Contacts with public authorities

As a general rule, all contacts with public authorities must be handled by the responsible that corresponds to the type of relation between the public authority and the Proximus Group

**Special case:** meetings with

- 1. Ministers at federal / regional / community level**
- 2. Presidents of political parties**
- 3. Commissioners at EU level**

Meetings with Ministers, Presidents or Commissioners shall be handled with care and in close cooperation with members of Group Public Affairs (GPA) and/or with a member of the **Proximus Leadership Squad** or a delegate of fore-mentioned people. If GPA is not present in those meetings, they shall always be informed of such meetings and of the content discussed, except if decide otherwise by the CEO or member of the Proximus Leadership Squad.

Group Public Affairs (GPA) shall thus handle and co-ordinate all Proximus Group contacts with public authorities in a legislative, policy/rule making or lobbying role.

Being a contact point, GPA can take up a role as facilitator or mediator in other contacts with public authorities for which it is not the relation owner, such as commercial or operational contacts.

### 3.4 Position making

Group Public Affairs (GPA) shall manage any Proximus Group position making concerning public affairs matters towards public authorities, according to the following rules:

1. A position making initiative can be initiated upon simple demand by GPA or by a division/subsidiary of the Proximus Group. As a general rule, the relevant stakeholders within the Proximus Group shall be involved in the determination of its content. From the start, GPA defines the most effective lobbying/communication strategy towards public authorities, identifies the most adequate interlocutor(s) within concerned authorities, and proposes timing and a methodology. Positions defended towards public authorities are preferably being formalised in an official position paper.
2. If necessary, position documents shall be submitted to Group Strategy to verify alignment with Proximus Group strategy, and/or to the department's strategies within the business units.
3. Important and/or sensitive public affairs files shall be submitted for approval to internal decision-making bodies, such as the BOD and the management committees. It is the responsibility of GPA to introduce such files to these bodies.
4. If necessary, Group Legal Services will then check the position documents as to its legal aspects, Group Communication will check as to consistency with other communications.

### 3.5 Communication

The Group Policy on “External & Media Relations” which defines the responsibilities, principles and rules for communication with external parties, must be respected at all times. In case of public authorities, the supplementary rules laid down in this document must be applied.

The communication format (on paper like letter, fax or document, electronically like file or E-mail, or by speech like conversation, presentation or telephone) is free and to be chosen among concerned parties. A copy of all written and/or electronic formats shall be maintained by the entity that handled the communication.

### 3.6 Transparency

GPA must be kept informed on all files/issues which can have a political impact on our image, our political relationships or can have an impact on existing files/issues of public affairs.

### 3.7 Memberships

All employees of the Proximus Group that in the exercise of their professional activity are member of an organisation related to public affairs, i.e., related to legislative or policy/rule making or lobbying activities, shall identify that membership to GPA. GPA maintains and coordinates all such memberships at the Proximus Group level.

### 3.8 Litigation

GPA will be informed of Any intention to set-up litigation against a public authority regarding a legislative act or a decree GPA.

### 3.9 Confidentiality

The Group Policy shall be respected at all times. In all cases, the chief of each division/subsidiary is responsible for approving the release of its information.

In cases where the information is confidential, this should be clearly indicated.

More specifically, every employee of the Proximus Group when having contacts with public authorities or their representatives in the exercise of his/her professional activity:

- observes complete discretion: he/she may not disclose confidential information to a public authority without prior approval of GPA.
- does not disclose any confidential information obtained from a public authority to persons who are not involved in the public affairs file.
- gives full transparency about the source of any obtained information: employees shall not protect their relationships by not identifying the source to GPA.

## 4. Consequences of non-compliance

Any violation of this policy could result in disciplinary measures that may lead to dismissal, in accordance with the employment regulations applicable to you.

## 5. Compliance monitoring process

- Group Public Affairs will control on a case-by-case basis the compliance with the policy.