Our way of working.

KPN Code of Conduct
The KPN Code of Conduct is applicable to all KPN employees, including the Board of Management, the Supervisory Board and temporary staff. Supplementary rules apply to certain specific functions and positions. These rules are set out in separate codes, entitled ‘Insider Trading’, ‘Retail’, ‘Customer Service’ and ‘Engineers’. The staff concerned will be given further information by their line managers.
Grow together

KPN connects. We are a close-knit company, strongly rooted in Dutch culture and society. With our network we bear a great responsibility. Consumers, companies, the government and the emergency services count on our services. Day in day out we ensure a reliable, high-quality connection. That is our promise and that is also what our stakeholders expect from KPN. With our strategy we want to be successful in the competitive Dutch market by offering our customers the best connection, service and customer experience. That requires something from all of us; also from the way in which we achieve this together.

In the KPN Company Code describes how we fulfill our objectives. Based on eight principles, we explain how we deal with people, resources and the environment. How we make life more free, more fun and easier and contribute to a more prosperous and cleaner world. We have an important social role and therefore the responsibility to be honest and reliable, in the way we work together, how we handle information and resources, and the way we compete.

That is why I attach great importance to understanding, respecting and complying with the KPN Company Code. Our company values are elaborated in principles, agreements and rules. We all adhere to these agreements. We hold each other accountable and discuss our questions or dilemmas, but always focus on our joint mission. That’s how we perform, excel and live up to our reputation in the right way.

Joost Farwerck

Chairman of the Board of Directors and CEO
Our mission and strategy

Mission
We believe that communication technologies enriches life. It is our mission to provide safe, reliable and future-proof networks and services, enabling people, businesses and organizations to be connected anytime, anywhere, adding value to their lives.

Strategy
Our strategy is based on three pillars:

Simplify – Grow – Innovate

We will deliver major business Simplification, expand the capacity of our fully integrated network, and keep innovating to drive new products and give an excellent customer experience to all our customers at home, on the move and at work. Based on this strategy, we will maximize value for our shareholders and all other stakeholders while maintaining a solid financial profile.
Our core behaviours

Having a clear common objective will enable us to achieve more, maximize job satisfaction and create an inspiring work climate in which we thrive and prosper. Only then will we – and by extension our customers – experience freedom.

Everything we do is about our customers. We wish to offer them the ‘KPN experience’ which they will appreciate, remember and recommend to others. One thing is certain: it is the KPN customer experience which allows us to make a difference, not only today but far into the future.

Customer
We are KPN. Everything that we say and do will directly influence the customer’s perception. Based on our behaviour, the customer forms an opinion of our organization. To create the desired customer experience, it is essential that we all demonstrate the behaviour that is expected of us. Behaviour is directly linked to our common objectives. We must see things from the customer’s point of view, make things simple, solve problems at once. We must not just meet but exceed the customer’s expectations.

Teamwork
KPN staff motivate and inspire each other. Together, we create the perfect working environment. The image we intend to present to the outside world is equally important within our walls. The customer will immediately recognize the positive effects of good teamwork. By creating a pleasant, effective and efficient work environment, we are also creating the desired customer experience.

Simplicity
Our approach is characterized by simplicity; we like to keep things simple. Although our products and services represent state-of-the-art technology, they are also user friendly and readily understood by people of all ages. Our service philosophy is equally clear and straightforward: we like to help the customer in any way we can.

Dutch society can count on us. We are here, ready and willing to help at any moment.
How we interact

We treat each other with respect and speak up in case of any misconduct

We take ownership for our own performance and the reputation of KPN

KPN is a modern employer which places great importance on staff satisfaction and fulfilment. Together we are responsible to accomplish this. We promote diversity and create a pleasant working environment with mutual trust and respect. It is an environment in which all staff take responsibility for their own performance and for the reputation of the company as a whole. We speak up about our conduct, regardless of position or seniority. We are aware of each other’s vulnerabilities and we maintain a flexible approach. We protect each other against all forms of inappropriate conduct, including aggression and violence, bullying, intimidation, sexual harassment and discrimination. Managers are expected to promote an atmosphere in which issues can be discussed openly and honestly.

KPN embraces the principles of ‘New Living and Working’ to the greatest extent possible. In this modern working concept, staff enjoy the freedom to organize their own work activities and (in consultation with colleagues and line management) to decide when, where and how they work. Successful implementation of ‘New Living and Working’ is in the interest of our organization and everyone within it. We are jointly responsible for making it work.

We do not engage in any extracurricular activities which may conflict with our ability to perform well at work, or which may conflict with the interests of KPN. We avoid all conflicts of interests or suspicion thereof. Proposed extracurricular activities are discussed with the line manager in advance, and registered in MijnHR along with the manager’s formal approval. Any income from extracurricular activities which are based on the employee’s affiliation with KPN need to be handed over to KPN.
How we interact with third parties

We ensure that business decisions can be made sound, fair and without conflict of interest

We compete fairly and without abuse of our market position

We are always cautious when accepting or offering business gifts or invitations. We never accept or offer any gift or invitation which may create some expectation of reciprocity. We report all gifts, whether accepted or declined, to our line manager to ensure that the integrity of business decisions can never be called into question. In principle, we never accept or offer any gift or invitation which represents a value of more than 100 euros. If there are sound reasons for doing so, permission must be sought according to set procedures. All considerations relating to the acceptance or offer of gifts are recorded in cooperation with the line manager.

We ensure that we do not embarrass any party by offering gifts or invitations. Before doing so, we ascertain whether acceptance of the gift would contravene the policy or code of conduct of the recipient’s organization.

We do business only with designated ‘preferred suppliers’.

We comply with all applicable competition laws and regulations. Competition law exists to ensure that the market mechanisms of supply and demand work effectively in the interest of the consumer. It prohibits cartel-forming, penalizes the abuse of any dominant market position, and prevents unfair market concentration by evaluating proposed mergers or acquisitions. When preparing any proposal, we must determine whether KPN enjoys a dominant position on the market and the implications for subsequent action. We are also mindful of the provisions of the Dutch Telecommunications Act and maintain an overview of all markets on which KPN is deemed to have ‘significant market power’.

Link to sub-code 2: How we interact with third parties
How we deal with information, communication and company resources

We safeguard corporate information and personal data

We are conscious in our communication and our use of company resources

We produce and distribute information which is accurate, complete and readily understandable, for the benefit of colleagues as well as third parties. We are responsible for ensuring that administrative records remain accurate and reliable at all times. We offer full transparency about our activities, performance and financial situation.

We ensure that confidential information – in whatever form – is never disclosed to unauthorized users. Personal data or other sensitive information is used solely as permitted by law. We are conscious in our use of financial information, particularly that which may affect our share value, and we never engage in any form of ‘insider trading’. We keep all information securely, and never longer than absolutely necessary. We apply thorough procedures to ensure that all data is irretrievably deleted or destroyed.

All company resources are used only by the person to whom they are issued and remain the property of KPN at all times. They are intended for business purposes only and we respect the limitations this entails. We take care of all company resources, taking appropriate precautions against misuse, loss, theft or damage.

We conduct all communication in a cordial and respectful manner. We are aware that the statements or comments we make on web sites, social media and other forums can reflect on KPN and may impact the reputation of the organization. We do not respond to press enquiries but always refer them to the Media Relations department, since only the designated PR spokespersons and members of the Board of Management are authorized to speak on behalf of the organization.

Link to sub-code 3: How we deal with information, communication and company resources
How we interact with society

We help society by connecting people

We respect people, resources and the environment

Every day we connect millions of people, allowing them to communicate safely and securely. We provide crucial services to various economic and social sectors. Our services help make life more convenient and more enjoyable. They support progress in health care, housing and employment practice. We offer added value to society, not least through our climate-neutral operations. We actively restrict our environmental impact by minimizing waste production, recycling wherever possible and using all resources as responsibly as possible.

We have the opportunity to fulfil all our commercial, social and personal ambitions. KPN invests in the future of its people by providing talent development programs and by emphasizing the importance of physical and mental well-being. Good health, vitality and job satisfaction combine to ensure that all KPN staff enjoy an excellent position on the employment market. We take personal responsibility for our own health and well-being.

We endorse and observe all international guidelines with regard to human rights and good employment practice. Consumer safety is a priority. We comply with all relevant international legislation, as well as the national and local laws of the countries in which we do business. We expect all suppliers to do likewise. Where necessary, we work with them to help them improve.

We structure and manage the company in accordance with the accepted standards of Corporate Governance. We provide shareholders, regulators and other stakeholders with transparent, timely and reliable information about our activities, governance arrangements, financial situation and performance.
Information, advice and reporting

We speak-up about compliance with the KPN Code of Conduct and sub-codes, regardless of position or function within the organization. You must familiarize yourself with the content of the relevant codes, and comply with it at all times. Line managers oversee compliance and create an atmosphere in which matters can be discussed openly. If you disagree with a colleague and are unable to resolve it, contact your line manager, HR consultant or the confidential advisor (staff counsellor).

If you have any questions about a code or are experiencing an (ethical) dilemma you do not wish to discuss with your line manager, contact the KPN Security, Compliance and Integrity Helpdesk. You can also report any irregularities anonymously via the SpeakUp Line.

The KPN Code of Conduct and sub-codes present rules of conduct. These rules are binding and compliance is mandatory. Based on reports of (suspected) misconduct, the activities and behavior of employees can be investigated taking due account of the applicable procedures. Any violation can lead to disciplinary action as provided by the KPN Collective Labour Agreement (CAO). Depending on the circumstances, sanctions range from a written warning to instant dismissal.

Information, advice and reporting

1. Contact your immediate line manager
2. Contact the KPN Security, Compliance & Integrity Helpdesk 0800 - 40 40 442 or securityhelpdesk@kpn.com
3. Contact the confidential advisor: see KPN Vertrouwenspersoon
4. Anonymously, via the KPN SpeakUp Line: 0800 - 02 22 931 (login code 57660)
The KPN Code of Conduct in eight principles:

**Each other**
- We treat each other with respect and speak up in case of any misconduct
- We take ownership for our own performance and the reputation of KPN

**Third parties**
- We ensure that business decisions can be made sound, fair and without conflict of interest
- We compete fairly and without abuse of our market position

**Information, communication and company resources**
- We safeguard corporate information and personal data
- We are conscious in our communication and our use of company resources

**Society**
- We help society by connecting people
- We respect people, resources and the environment