

Convenience Translation
 In any case of inconsistency, the Code of
 Ethics in Hebrew shall prevail

Code of Ethics

For Proper Conduct

Start 





Dear Employees,

The Cellcom Group is committed to maintaining fairness, transparency, and a high standard of ethics in all areas of its activity.

Cellcom was one of the first companies in Israel to develop a code of ethics and implement it in its service policy and in all interfaces of activity with customers, suppliers, stakeholders, and the general public.

It is important to remember that when the Code of Ethics helps us perform our duties in the most correct and ethical manner, it protects each and every one of us and the Group as a whole.

I expect all of you to act in accordance with the guidelines of the Code of Ethics, which reflect the spirit of Cellcom, so that we may continue to serve as an example of proper conduct, a pleasant and safe workplace, and a company whose customers are happy to choose its services.

Sincerely,
Eli Adadi, CEO of the Cellcom Group



The Cellcom Group is a communications group that provides a variety of communications and complementary services under one roof. The Cellcom Group includes, among others, the following: Cellcom Israel Ltd., Dynamica Communications Chain Stores Ltd., Pitronot Tikshoret Ltd., Golan Telecom Ltd., Safeway - Data Protection Solutions Ltd., and the subsidiaries controlled by the above corporations. Whenever “we,” “Cellcom,” or the “Company” is mentioned, the reference is to the above corporations and all or some of their controlled subsidiaries, as the case may be. For convenience, the Code of Ethics is written in the masculine form, but it is addressed to both women and men.

The Spirit of Cellcom – Do the Right Things for the Right Reasons



For our customers, each one of us is essentially the Cellcom Group.

We act wholeheartedly to provide them with the highest quality services and products – with fairness and transparency. Each of us has a personal responsibility to act in full compliance with the law and to uphold the highest moral and ethical standards.



The Company's Code of Ethics sets forth a wide range of rules and principles that bind the Company, its employees, its office holders, and its board members ("Company Employees"). We expect all Company Employees to read the Code of Ethics carefully, to maintain proper conduct, and to set a personal example of commitment to the standards set forth therein.



All Company Employees must respect the law and fully and absolutely comply with its provisions wherever we operate. They are not permitted to violate, in their own name and/or in the name of the Company, any provisions under any law or professional rules applicable to the Company. In any case, ignorance of the law does not constitute a reason or explanation for its violation.



Every employee must understand that the Code of Ethics is not intended to address every possible situation they may encounter and is not intended to serve as an exhaustive and detailed guide for conduct or to diminish the importance of relevant laws and procedures not detailed in this Code of Ethics. Therefore, in maintaining and implementing the principles of the Code of Ethics, every employee must exercise reasonable and appropriate judgment, and must read and implement the Code alongside the provisions of the law and relevant procedures. We must remember that each and every one of us must act ethically and morally even in the absence of explicit rules or specific company policy. In any case, there is always someone to consult with, directly or discreetly, and it is recommended to do so in any case of doubt.



It is important to emphasize that violation of the principles and rules detailed in this document may lead to disciplinary measures by the Company, including dismissal and/or, in severe cases, the initiation of criminal proceedings against the employee.



Code of Ethics

Maintaining a
Safe and
Respectful
Workplace



Maintaining a Safe and Respectful Workplace

In order for us to enjoy a good and safe work environment, bring out the best in ourselves, and move forward together with Cellcom, we must be fair to ourselves and our colleagues, and feel that we are working in a fair, supportive, reliable, and protected environment.

Respect and Equality: Yes to Diversity. No to Discrimination.

Tolerance and human rights begin at home. Each of us must be careful to show respect for others and for multiculturalism, and to avoid any conduct, statement, or comment that may offend anyone with whom we come into contact, including our colleagues, even if said in humor and without any intention to offend.

We must continue building a tolerant company that respects everyone, enables each and every person to grow, and contributes to equality and the prevention of discrimination in Israeli society as a whole. Company policy requires that every employee be treated with fairness, respect, and equality. The policy requires employees and managers to comply with all provisions of law relating to the employment of employees, and prohibits discrimination in connection with the employment and promotion of employees on any non-professional basis, including discrimination on the basis of race, color, religion, gender, sexual orientation, personal status, parenthood, origin or nationality, disability, or age, all in accordance with the provisions of law.

Employment of Family Members

The employment of family members shall be carried out in accordance with the “Employment of Family Members” procedure available on the corporate portal, as updated from time to time.



Proper Conduct and Prevention of Sexual Harassment

Duty to report and handle a romantic relationship between a manager and a subordinate

A professional work environment is one in which a manager evaluates their employees solely based on their fulfillment of the job requirements and not based on personal relationships or other factors that are not relevant to the working relationship.

To ensure the above, a manager must report to the divisional human resources manager prior to the beginning of a romantic relationship, in any case where there is a relationship of authority of any kind between the two (direct or indirect), so that one of the two may be assisted in finding an alternative position.

Prevention of Sexual Harassment

The Company's policy prohibits sexual harassment in any form.

The Company acts with the utmost severity in any case of suspected sexual harassment, by a man or a woman. Sexual advances, blunt approaches, offensive remarks, and jokes of a sexual nature and/or regarding sexual orientation, as well as touching and hand gestures, may be interpreted as sexual harassment even if not intended as such.

It is important that you know –

According to the law, within the framework of a relationship of authority at work or in service – when there is a direct or indirect relationship of authority between the harasser and the harassed, this will be considered sexual harassment even if the harassed did not express refusal. Please review the presentation on the prevention of sexual harassment on the organizational portal as well as the regulations for the prevention of sexual harassment found on the organizational portal and on the bulletin boards.

Reporting sexual harassment: In any case of suspicion of sexual harassment, against you or against another in the Company, it is important to immediately contact, without hesitation, the person responsible for the prevention of sexual harassment, Nirit Toledano, Project Manager and Employment Diversity, Human Resources.

Remember –

No one can threaten your position because of your complaint about sexual harassment!

The Company will not tolerate threats or acts of retaliation against anyone who files a complaint.

Maintaining a Safe and Respectful Workplace

Proper and Respectful Conduct

The Company is committed to ensuring appropriate conduct by all of its employees and representatives and to maintaining its professional and respectable image.

Smoking on Company Premises Policy



Designated smoking areas are allocated for smokers, in order to prevent exposure to secondhand smoke and smoke-related hazards for all persons present at the Company and its facilities. Accordingly, smoking is strictly prohibited throughout all Company premises, except in the areas designated for this purpose. It is strictly forbidden to smoke in private offices or in any other location, even if no one objects.

Prohibition of Use of Addictive Substances



We expect our employees to arrive at their workplace sober and fit for work. We prohibit any use of any kind (including distribution) of drugs, misuse of prescription medication, and consumption of alcoholic beverages on Company premises, in Company property (including vehicles), and/or in the course of its activities.

Prohibition of Violence: Physical and Verbal



The use of offensive language, raising one's voice, threats of violence, and any physical or verbal violence are strictly prohibited. The Company opposes any use of violence, even as a response to violence, except in cases of self-defense.

Maintaining a Safe and Respectful Workplace

Proper and Respectful Conduct

The Company is committed to ensuring appropriate conduct by all of its employees and representatives and to maintaining its professional and respectable image.

Respectful Communication



We expect employees to exercise appropriate judgment and act with discretion in their communications, including emails, memoranda, notes, and all formal and informal communications relating to the Company's business. Employees must avoid inappropriate or defamatory remarks about other individuals or companies, unprofessional language, and financial, legal, or business statements, unless they are authorized to make such statements in the course of their duties.

Political Involvement



It is prohibited to use Company resources and/or assets and/or funds, including the Company's computer systems, for any political activity whatsoever. Employees who take part in political activity must do so only outside the scope of their work and outside working hours.

Appearance and Dress Code



You are required to arrive at work in appropriate and proper attire. Employees who are in contact with clients are required to dress in a professional and presentable manner.

Maintaining a Safe and Respectful Workplace

Guidelines for Activity on Social Media



Many customers today use the internet (including social media and forums) as a simple and convenient way to share their service experiences with the public.

If you come across such an inquiry, you must not respond or initiate contact with customers — neither as a “private individual” nor as a “Company Employee.” The inquiry must be forwarded to the Customer Service Department for further handling.

We believe that through official and high-quality service, we can turn every customer into an ambassador of the Company!

Furthermore, in any activity and correspondence conducted on social media, we expect you to maintain a culture of discourse and communication, the privacy and dignity of customers, and clean and respectful language. Do not harm the privacy of customers and do not defame your colleagues or the Company by these means, including correspondence in talkbacks. It must be remembered that the Company's customers and its competitors are also exposed to the information and its wording.

Care must be taken to avoid offensive statements in general and especially those related to religion, nationality, race, and gender.

Maintaining a Safe and Respectful Workplace

Compliance with Labor Laws



We comply with the laws of the State of Israel also in all matters relating to labor laws and work procedures, and are very careful that our employees work in accordance with all laws and procedures, including strict adherence to the maximum number of working hours and rest hours. The full instructions are detailed on the organizational portal. We expect employees and managers to strictly comply and act according to these instructions, in order to enable the required balance between work and leisure.

We comply with the laws of the State of Israel in all matters relating to the employment of manpower company employees, and expect our employees who engage with manpower companies to ensure that such engagement does not violate the rights of the employees of the companies providing services to the Company on its premises; in accordance with the law and the procedure published on the organizational portal and on the bulletin boards. Manpower company employees are entitled to contact us as the service requesters in any case where, in their opinion, any right due to them from the contractor employing them has been violated.

Maintaining a Safe and Respectful Workplace

Environment, Health and Safety



Environmental protection and safety are essential for our health and maintaining quality of life for ourselves and future generations. We allocate significant thought and resources to environmental protection. As such, Company Employees are required to comply with all applicable environmental and safety laws and procedures, such as those relating to noise hazards, hazardous materials, and radiation, and to ensure that all employees under their responsibility, including contractors, comply with these laws. Each of us is also required to maintain a high standard of cleanliness in our individual workspaces and in public areas:

- ❖ Every employee must be familiar with the relevant safety procedures applicable to their role and processes, the potential risks, and the ways to prevent accidents and harm arising from these risks. Employees must fully comply with safety instructions and use the equipment and means provided by the Company.
- ❖ Every manager must ensure that their employees are trained regarding the safety risks in their unit, that safety procedures and requirements are implemented within their unit, and that a culture of safe, accident-free work is maintained within their area of responsibility.

Reporting obligation: You must immediately report to the Head of Security Department any safety incident, work accident, unsafe or hazardous work, safety or health hazard, or any event that may result in injury or property damage.

Code of Ethics

Maintaining
a Safe and
Respectful
Workplace

Ethical
Relationships with
Stakeholders and
Competitors



Ethical Relationships with Stakeholders and Competitors

Duty to promote the Company's objectives:

Company Employees are obligated to promote the legitimate objectives of the Company at every opportunity that arises for them and also to arrive at work on time and in a condition that enables them to work with full concentration, efficiency, and productivity.

Prevention of conflicts of interest and prohibition on exploitation of corporate opportunities:

The Company's policy prohibits its employees from acting in a manner that is not consistent with the interests of the Company or from being in a situation that may lead to a conflict of interest with the Company, even in appearance. Company Employees are also prohibited from exploiting opportunities for themselves personally by using assets, information, or their status in the Company or from making personal use of any of these. To avoid conflicts of interest, the following rules apply to all employees:



Ethical Relationships with Stakeholders and Competitors

Prevention of Conflict of Interest and Prohibition on Exploitation of Corporate Opportunities:



1 Prohibition on Using One's Position in the Company for Personal Gain or Benefit

Employees must not exploit their position or relationships with Cellcom and its employees to promote their own private business interests, including their personal financial affairs, even if doing so does not come at the Company's expense. Employees are also prohibited from conducting business with family members or friends unless the appropriate approvals have been obtained and such activities are carried out in accordance with Company procedures. An employee of the Company, and/or anyone acting on their behalf (including family members), may not receive inappropriate personal benefits arising from their position within the Company, including gifts, hospitality, grants, loans, or similar benefits.

2 Prohibition on Direct or Indirect Competition with the Company

Employees must refrain from any activity that directly or indirectly competes, or may compete, with the Company's business activities, or that assists, or may assist, a competitor in any way, whether for compensation or otherwise. This includes situations in which an employee plans, during their period of employment with the Company, to compete with Cellcom's business activities.

Ethical Relationships with Stakeholders and Competitors

Prevention of Conflict of Interest and Prohibition on Exploitation of Corporate Opportunities:

**3**

Prohibition on Providing Services to, or Maintaining a Business Relationship with, a Competitor, Customer, or Supplier

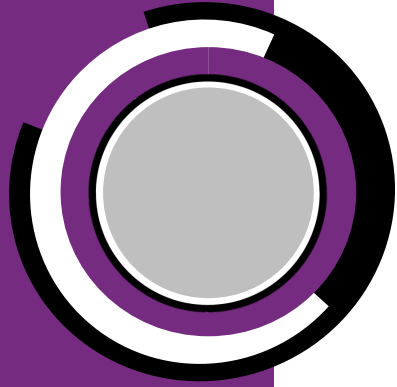
Employees must avoid direct or indirect involvement in situations where they have a financial interest (or any other personal interest) in the Company's suppliers, customers, or competitors, or in any transaction involving the Company, a competitor, a customer, or a supplier, unless the appropriate approvals have been obtained and such involvement is conducted in accordance with Company procedures. Company Employees are prohibited from serving as a designated representative or point of contact for any other business entity that is a customer of the Company.

4

Prohibition on Secondary Employment

Employees may not engage in additional employment unless prior written approval has been obtained from the VP of Human Resources.

*Even where such approval has been granted, employees must not act in a manner that creates a conflict of interest or exploit corporate opportunities for personal benefit. Any employee who encounters a situation involving an actual or potential conflict of interest between the interests of the Company and their personal interests, or the personal interests of another employee, must report it in accordance with the guidelines set out in the section entitled "Reporting Suspected Violations of Company Policy."



Ethical Relationships with Stakeholders and Competitors

Supplier Relations

Decisions regarding the selection of suppliers and procurement must always be business decisions made according to objective criteria and based on relevant considerations. Personal considerations must not be permitted to influence our decisions, including personal relationships, gifts, or any other item of direct or indirect value. Supplier selection must be based on relevant considerations that reflect the best interests of the Company.

No gifts may be accepted from suppliers.

If a gift is nevertheless received, it must be transferred to the relevant function within Cellcom for donation to the community. It is strictly prohibited to accept mobile phones or any other equipment from importers, distributors, or suppliers without prior approval and proper registration in the system. Employees must not engage in private business dealings with suppliers with whom they work in the course of their employment, except in accordance with the applicable approvals and rules set forth in the relevant procedure, and strictly at prevailing market prices without any discount or benefit. For further details, please refer to the relevant procedure on the organizational portal.

The above provisions also apply to anyone acting on behalf of the employee, including family members. The principles governing the giving and receiving of gifts from suppliers also apply to our relationships with the Company's stakeholders.

We expect consultants, representatives, agents, distributors, subcontractors, and other business partners of the Company to maintain lawful and ethical business conduct. In order to protect Cellcom's reputation, business dealings with companies that violate the law, or whose reputation may harm our business, must be avoided.

The Company's policy prohibits engaging third parties to perform activities that would be inappropriate for the Company itself to perform under the policy set out in this Code.

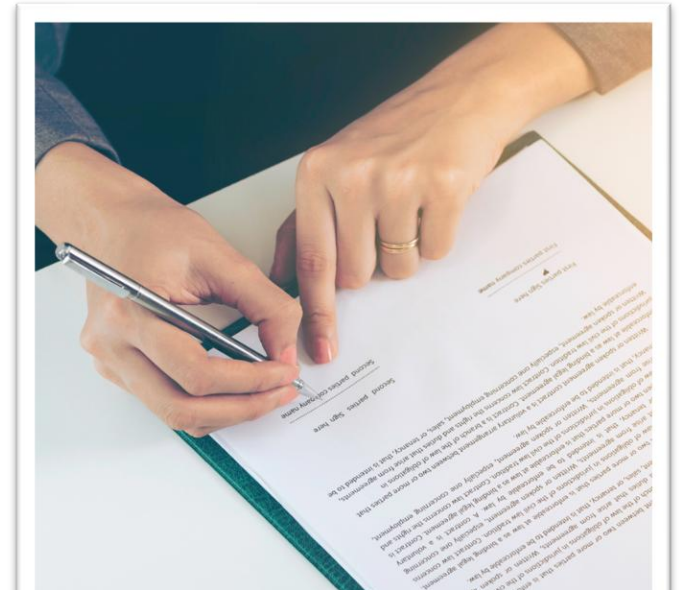
Customer Relations and Privacy Protection



We are committed to maintaining a high level of quality in the products and services we provide and to act in a clear and transparent manner towards our customers, while presenting the information relevant to their interests. It is strictly prohibited to intentionally mislead a customer. Our policy also prohibits false or misleading statements regarding our competitors; therefore, caution must be exercised when you describe a product or service offered by a competitor.



Publication of the Company's activities and its various promotions shall be done fairly and in accordance with all laws and in accordance with the relevant standards in the field of advertising.



Customer Relations and Privacy Protection



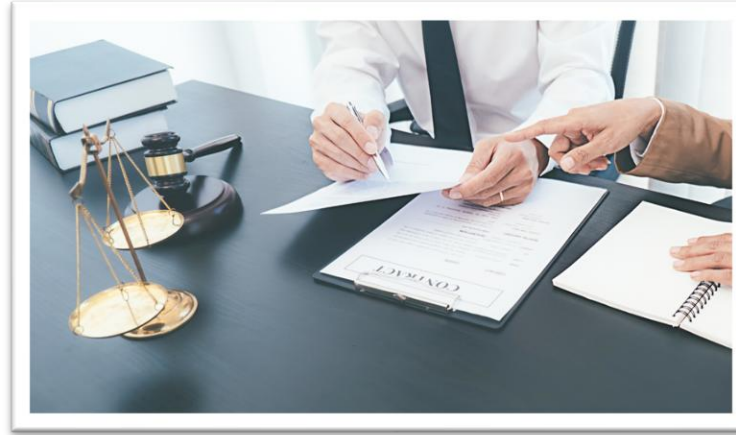
The trust our customers place in us is a valuable asset. Any use of information in our possession about our customers contrary to law is prohibited and harms this trust and our relationship with customers. Access to the databases existing in the Company is limited to those employees who must know the information and is provided for work purposes only. Any case of violation of customer privacy will be handled with utmost severity.

Access to a customer record shall be for business purposes only. It is strictly forbidden to access the private records of your relatives or acquaintances (including for the purpose of performing actions). Handling of Company Employees shall be carried out by the call centers only and in accordance with Cellcom procedures. Handling of friends/relatives shall be carried out by the "Purple Ambassador".

It is forbidden to transfer information from the Company's databases (including) to law enforcement authorities except with the approval of the authorized person in the security department only. Our employees and those on our behalf are not permitted to disclose records or documents containing details and information about the subscriber, including account details, call transactions, their times and destinations, except to the subscriber himself or his duly authorized representative, in accordance with Cellcom procedures.

For further details on this matter, see the procedures on the subject in the organizational portal.

Irregular Payments



We believe that we will succeed in our business and overtake our competitors based on our advantages without needing to resort to improper methods.

We do not want our customers to contact us as a result of receiving irregular gifts and benefits.

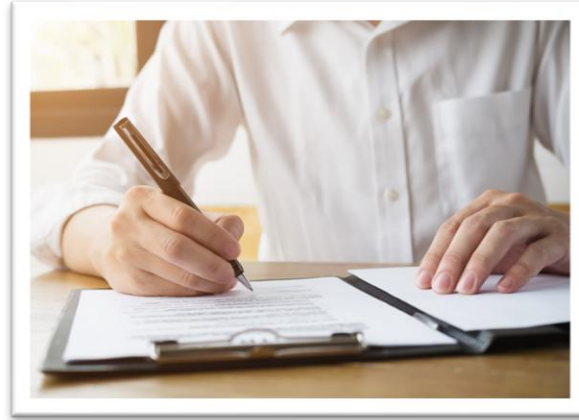
It is strictly prohibited to give or receive money or any benefit for doing or refraining from doing, preference or discrimination. Promoting a certain action or bias, asking a person to deviate from the norm in the performance of his duties or for an action that an employee was required to do according to his position. This prohibition applies whether it is done directly or through another person.

It is strictly prohibited to use unlawful means to promote the Company's business.

It is forbidden to receive or give a bribe (a bribe also includes money, equivalent value, service or other benefit for an action related to the position). It is also forbidden to take a bribe in order to give a bribe to another person. The one who requests a bribe, even if he did not ultimately receive it, shall be considered as having taken a bribe, and the one who offers a bribe, even if rejected, shall be considered as having given a bribe.

Receiving or giving a bribe is a serious violation of our principles and of the law. An employee who violates the law and the Company's principles will be dealt with most severely.

Fair Competition



We are meticulous about managing competition in the market with maximum fairness and maintaining compliance with all laws.

Prohibition on coordination or arrangement with competitors: It is forbidden to make any arrangement that may prevent or reduce competition in the market. In this regard, several rules by way of example:

- It is forbidden to enter into any agreement or reach any arrangement with a competitor or supplier if this may reduce competition, unless the agreement or arrangement has been approved in advance by the Company's Legal Department.
- It is forbidden to coordinate prices or division of customers between competitors or suppliers; it is forbidden to transfer confidential information to competitors; it is forbidden to cooperate with competitors or coordinate bids in tenders.
- If during your conversation, a customer or competitor enters into an inappropriate subject, you must immediately end the conversation.
- Any cooperation with competitors may be a restrictive arrangement and therefore the Legal Department must be consulted.

Competitive Intelligence: We must act fairly towards all entities with whom the Company has business relations. We prohibit our employees from using inappropriate or illegal means (such as wiretapping, surveillance, threats, etc.) to obtain competitive information that is confidential or proprietary to a third party, and our employees are also prohibited from disclosing confidential information in their possession due to their work at previous workplaces.

Code of Ethics



Maintaining a
Safe and
Respectful
Workplace

Ethical
Relationships with
Stakeholders and
Competitors

Use of
Information
and Resources



Use of Information and Resources

Duty of Confidentiality, Protection of Business Information and Prevention of Industrial Espionage



Prohibition on Use of Inside Information and Prohibition on Trading in Securities Based on Inside Information



Reporting on Significant or Irregular Events



Quality of Public Reporting



Internal Enforcement Program – Companies and Securities



Company Assets



Use of Computer and Electronic Information



Monitoring and Control Actions



Confidentiality, Protection of Business Information, and Prevention of Industrial Espionage

Duty of Confidentiality

There is an obligation to maintain absolute confidentiality of all confidential information, including trade secrets or information related to the Company's business affairs and/or any information relating to employees, customers, suppliers, business partners, and any other information that has come to our knowledge due to our position and is not public (such as, but not limited to: future marketing campaigns, strategy, work processes, procedures and training, information from the guru, customer records, financial information, information on salaries and benefits, etc.).

It is forbidden to remove, transfer to another and/or make use other than for the purpose for which it was given of any confidential information of the Company, and it is forbidden to disclose or make use of information received from a third party, except in accordance with the conditions included in the agreement with him.

Employees are not entitled to use the Company's confidential information other than for the purpose for which it was given to them or to disclose it at any time, whether they have expressly undertaken to do so or not.

Information Security

We are obliged to be careful and to safeguard the information in our environment and to lock sensitive information in the relevant drawers and cabinets: it is forbidden to leave confidential information in places where it may be discovered. It is forbidden to discuss confidential information in public places, where someone may overhear us. We expect all employees to exercise judgment in limiting access to confidential or private information only to those people in the Company who need this information for the performance of their duties.

The duty of confidentiality, protection and prevention of industrial espionage applies to all employees even after the termination of their employment with the Company and without time limitation.



Confidentiality, Protection of Business Information, and Prevention of Industrial Espionage

Handling of Inquiries from Parties Outside the Company by Authorized Parties Only

The transfer of information regarding the Company's business and its conduct is only through employees authorized for this purpose. In light of this instruction, no discussion on these matters shall be held with parties outside the Company, including media personnel, analysts, and attorneys.

It is forbidden to release and publish information about the Company for any purpose whatsoever, including responding to customer inquiries on social media, forums, talkbacks, etc., except with the approval of the VP to whom the employee is subordinate, the VP of Human Resources, and the spokesperson.

Please note!

Any inquiry from the media must be referred to the spokesperson.

Inquiries from the financial community (bankers, brokers, analysts) must be referred to the CFO.

Inquiries regarding legal proceedings must be referred to the Legal Department.

Questions regarding Company Employees or regarding former employees of the Company must be referred to the VP of Human Resources.

Academic Work Relating to the Company

Company Employees are not permitted to submit academic papers dealing with the Company that include non-public information, including information originating from within the Company and/or that has come to the employee's knowledge due to his work in the Company (including information about third parties).

Submission of a paper based on official published material of the Company requires prior written approval from the VP of Human Resources.

Prohibition on Use of Inside Information and Prohibition on Trading in Securities Based on Inside Information

Prohibition on Trading in Securities Based on Inside Information

Cellcom is a public company whose securities are traded in Israel and the United States. The Securities Law in Israel and the United States prohibits transactions in securities using inside information. Inside information includes any material information that is not known to the public and may affect the price of the securities.

You must maintain in absolute confidentiality all inside information that has come into your possession in the course of your work, and you and your family are prohibited from trading in securities of Cellcom or of Cellcom shareholders based on inside information, and you are also prohibited from providing a family member, friend, or any other person with a "tip" based on such information. Further details regarding the prohibitions applicable to you in this matter, the definition of inside information, as well as information regarding the "window period" during which it is permitted to trade in the Company's securities, subject to the prohibitions under the law, can be found in the procedure "Prohibition on Trading in Securities Based on Inside Information."

Reporting Regarding Significant or Irregular Events

Since Cellcom is a public company, it is subject to reporting obligations to the securities authorities and stock exchanges in Israel and the United States according to the securities laws. These reporting obligations include, inter alia, the obligation to report any matter that deviates from the Company's ordinary business which may materially affect the Company or the Company's securities, as well as transactions that are not in the ordinary course of the Company's business, or that are not at market terms or that are material.

You must report to the Legal Department immediately, and already at the early stages of the event, regarding any such event or matter.

For further details on this matter, see the procedure for reporting to the legal department regarding significant or irregular events.



Quality of Public Reporting

Internal Reporting

In the course of our work, many of us are required to report on actions taken with Company funds. We must all ensure that every record regarding work matters and financial matters is correct, complete, and accurate. The existence of accurate and complete records in accordance with Company procedures and as required by any law and the accounting rules binding upon it with respect to actions performed with Company funds is essential for the proper management of the Company and for the preparation of financial statements. False or incomplete information impairs our ability to make correct decisions regarding Company resources and in certain cases, is also a violation of the law.

External Reporting

Cellcom is obligated to provide, in accordance with the law and the instructions of the securities authorities in Israel and the United States, full and accurate information, in every material aspect, regarding Cellcom's financial condition and its operating results. Therefore, all reports and documents that Cellcom submits to the securities authorities and stock exchanges and all public publications of Cellcom must include full, accurate information, which will be presented fairly, clearly, and at the required times. In this context, Cellcom must ensure that there are controls and internal procedures in place to ensure that full information is recorded and reported as part of its reports. We must ensure that our reports to the relevant parties are accurate, complete, and at the required time, in accordance with all the rules and procedures of Cellcom. The responsibility of Cellcom's management is to ensure the existence of effective internal controls in all areas affecting Cellcom's financial reporting. Therefore, every employee must report to the Risk Management Department any significant deficiency or material weakness in the internal request that could materially affect Cellcom's results.

Internal Enforcement Program Companies and Securities

For the purpose of ensuring the fulfillment of all obligations imposed on it in the corporate and securities fields, Cellcom has adopted an Internal Enforcement Program.

By signing the Code of Ethics, you confirm that you have read the enforcement program, the procedures relevant to it, and the current CEO's letter, that you have understood their contents, and you undertake to act in accordance with them.



Company Assets

Each of us is responsible for safeguarding the Company assets and resources in our possession or under our care. It is prohibited to use these resources for personal purposes, and any use thereof must be carried out in accordance with appropriate Company approval:

Electronic and Other Equipment



Equipment provided to you by the Company, including a computer and your mobile phone (including a company-issued device, pilot device, SIM card, and secondary SIM), remains the property of the Company and is provided to you for your use only and solely for the purpose of performing your role. Such equipment may not be transferred to any third party, including another employee or a family member. In interactions with customers, employees must not use devices belonging to other companies. It is prohibited to receive mobile equipment as a gift or loan from external parties, including distributors and mobile manufacturers, without a formal approval process. The use of devices not provided by the Company shall be in accordance with the guidelines published on the organizational portal and Cellcom's procedures.

Company Vehicles



When driving a Company vehicle, you are not acting as a private individual, but as an ambassador of the Company. Accordingly, you are required to comply with all applicable laws and traffic regulations, maintain the vehicle in proper working condition and appearance, and refrain from affixing stickers to it. Employees are expected to arrive at the Company's offices using the vehicle provided by the Company, and the vehicle should remain at the Company's premises during working hours. The use of the vehicle is intended for work-related purposes and for reasonable personal use in line with the average usage within the Company. Use of the vehicle shall be subject to the guidelines set forth in the procedure: "Company Vehicle Use."

Use of Computers and Electronic Information



1. Duty of protection of computer systems

2. Internet use

3. Guidelines for information security in email

4. Record management and information retention



Use of Computers and Electronic Information

1. Duty of protection of computer systems



Computer systems – hardware, software, and data – are key factors in our business. Therefore, they must be protected against any damage, destruction, viruses, alterations, theft, and access, exposure, or use without authorization and improper use must be prevented. Action must be taken in accordance with Company procedures (including the procedure for use of computers and electronic information) and the following guidelines to ensure that our computer systems are properly protected:

- Passwords and access codes to the computer system: will be determined and maintained carefully according to Company Policy, including:
 - a. It is prohibited to provide a password to a third party or to use another employee's password.
 - b. Another employee or manager is not authorized to require you to provide your password or to require you to log in to a computer other than by using your own password.
 - c. A screen saver must be activated when you leave your workstation.
 - d. A laptop must not be left in a vehicle or in meeting rooms unattended.
- Use of the computer network is for work purposes only.

It is prohibited to connect a private removable media device (including mobile phone, camera, modem, Bluetooth) to the computer network.
- It is prohibited to install or modify software and hardware on the computer; care must be taken to use any software in accordance with the terms of the software license.

In this context, it is prohibited to copy software and use it at home or to provide a copy for another's use.

Use of Computers and Electronic Information

2. Internet Use



Authorization to use the internet via the equipment provided to you by the Company is for the purpose of advancing the Company's business objectives. It is prohibited to transmit messages containing offensive or illegal content, via the internet in general and via Company computers in particular.

3. Guidelines for information security in email



You must comply with information security procedures when sending email in accordance with the procedures on the subject and the following guidelines: It is strictly prohibited to send email containing classified information (whether in the body of the email and/or in an attached document) to an external email address. The email inbox is intended for professional purposes only. It is strictly prohibited to send material whose content may offend another person's feelings or copyright (such as: pornographic material, racist material, or pirated software). It is strictly prohibited to distribute email containing spam and chain letters. Do not open messages from an unknown source or those containing file types that are not familiar to you.

Use of Computers and Electronic Information

4. Record management and information retention



Company Employees are required to maintain orderly documentation of their work processes and to retain documents and information (including email).

Documents may only be destroyed in accordance with procedures found on the organizational portal and with the approval of the Legal Department.

Care must be taken not to destroy or alter documents or records (whether in paper form, email, or any other form), in response to or in anticipation of any legal proceeding or government investigation of any kind.

Monitoring and Control Actions

Communication Systems



The communication systems made available to you (including computers, internet access, network drives, email systems, including mailboxes and servers, and fixed telephone lines) are intended for work purposes and professional use only. The Company performs backup, monitoring, and control activities on these systems (including recording and listening to calls on designated recorded telephone lines), all in accordance with applicable law. In any case where there is suspicion of an action and/or use that is contrary to Company procedures and/or the law, and without detracting from any other remedy available to it, the Company shall be entitled to block access to its communication systems, including the computer network.

Surveillance Cameras



Surveillance cameras are installed throughout the Company's premises, including at workstations, work areas, and cafeterias. These cameras continuously record activity within Cellcom's facilities for purposes including, among others, security, supervision, and the detection and prevention of deviations from Company procedures. The cameras, the monitoring activities, and any recordings produced are intended solely for the Company's purposes and not for personal use. For further details, please refer to the procedure: "Privacy and Control Policy for Cellcom Employees."

Code of Ethics

Maintaining
a Safe and
Respectful
Workplace

Ethical
Relationships with
Stakeholders and
Competitors

Use of
Information
and
Resources

Reporting
Suspicion of
Violation of
Company
Policy





Reporting Suspicion of Violation of Company Policy

In order for the Company's activity as a whole and the activity of each employee in the Company to be safer and clearer, each and every one of us is responsible for complying with all laws and rules of ethics and for reporting any suspicion of violation of the rules detailed in this document.

It must be remembered that failure to report itself constitutes a violation of the Company's instructions and this document.

An employee who does not meet the standards detailed in this Code may bear disciplinary consequences, including dismissal and/or, in serious cases, the initiation of criminal proceedings. If you become aware of activities that do not conform to the principles written in this document, you must report this without delay as detailed below.

Your report enables damage mitigation, rapid and professional examination of the issues raised, and prompt correction of the situation.

It is possible to report anonymously as detailed below. Any anonymous report must contain sufficient information about the event to enable the Company to properly investigate the event. If the report or complaint requires confidentiality (including maintaining the anonymity of the reporter), the Company will act to maintain confidentiality, subject to the provisions of law; regulations and relevant legal proceedings.

The Company encourages all employees, managers, and directors to report any suspicion of violation immediately and intends to investigate any complaint of suspected violation of Company Policy that is submitted in good faith. The Company prohibits any retaliation against an employee for reports or complaints of inappropriate conduct submitted in good faith.

Free reporting of complaints or suspicions by employees, managers, and directors without fear of punishment or retaliation is essential for the successful implementation of the Code of Ethics.

Every employee, manager, and director is required to cooperate in any internal investigation of inappropriate or unethical conduct.

The Company recognizes the duty to implement the Code of Ethics equally on all those subject to it.

For this purpose, a department manager in the Human Resources Division of Cellcom has been appointed as the person responsible for implementing the Code of Ethics.

Reporting Suspicion of Violation of Company Policy

To whom should reports be made?

The VP Legal Counsel of Cellcom shall have the primary responsibility and authority for interpretation of the Code of Ethics, under the supervision of the audit committee of Cellcom. The Company shall devote all necessary resources to enable the VP Legal Counsel to maintain norms of accountability and compliance with the Code of Ethics.

- * In any suspicion of violation of ethical rules, laws, regulations or the Code of Ethics, a report must be made to the VP Legal Counsel of Cellcom.
- * On accounting matters, internal audit or external auditor audit, a report must be made to the audit committee of Cellcom.
- * In any suspicion of violation of ethical rules, laws, regulations or the Code of Ethics by the VP or the CFO or any member of management or director, a report must be made to the audit committee of Cellcom.

How to report?

1. It is possible to report anonymously directly to the chairperson of the audit committee of Cellcom (a copy will be provided to the VP Legal Counsel) through the "Code of Ethics" site on the organizational portal.
2. Reports of suspicion of such violations and questions regarding the Code of Ethics may be referred to the relevant party in the Company through the person responsible for implementing the Code of Ethics in the following ways:

Anonymous report

By phone: 052-998-9099, by internal mail: internal P.O. Box 50

Non-anonymous (discreet) report

By email: MYCODE@CELLCOM.CO.IL