



Code of Ethics and Conduct

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A message from the Executive Leadership Team

Team,

At TELUS, our shared commitment to ethical conduct is the cornerstone of our world-leading culture. Our team members strive to interact with our many stakeholders and each other in a way that is authentic, transparent and fair. This includes creating a work environment where our team members feel physically and psychologically safe, and where honest feedback is both encouraged and embraced. These expectations apply not only to our team members across the globe, but also to our contractors, partners, suppliers, vendors, board members and other groups that represent or act on behalf of TELUS in any way.

Our Code of Ethics and Conduct guides our actions and serves as a resource for all members of our TELUS family. The Code provides tangible examples of how each of us can ensure we are always conducting ourselves ethically and transparently, including ways to avoid conflicts of interest; the rules around accepting gifts and benefits; the many ways in which we are all responsible for protecting TELUS' brand, reputation, assets, information and intellectual property; and the critical role we all play in safeguarding our customers' data, security and privacy. The Code ensures that every TELUS team member is guided by the

same values and understands what is expected, regardless of work location or role in our organization. Notably, this year's Code further strengthens the ethical expectations of our team members who work remotely, as we continue to evolve our Work Styles program to reflect today's society. In this regard, we ask that you familiarize yourself with our updated Code of Ethics and Conduct to make sure you are always meeting our company's ethical expectations.

On behalf of our entire TELUS leadership team, thank you for following our Code of Ethics and Conduct and for continuing to promote inclusion, authenticity and transparency across your teams, each and every day. It is our collective efforts to embrace ethical behaviour that bring to life our caring culture, propel our global leadership in social capitalism and empower TELUS to win the hearts and minds of customers around the world.

With appreciation,

The TELUS Executive Leadership Team



Andrea Wood
Executive Vice-president, Chief Legal
& Governance Officer



Darren Entwistle
President and CEO



Doug French
Executive Vice-president and
Chief Financial Officer



Jill Schnarr
Chief Communications
& Brand Officer



Navin Arora
Executive Vice-president and
President, TELUS Business Solutions,
TELUS Agriculture & Consumer Goods,
TELUS Health



Sandy McIntosh
Executive Vice-president,
People & Culture and
Chief Human Resources Officer



Tony Geheran
Executive Vice-president and
Chief Operations Officer



Zainul Mawji
Executive Vice-president and
President, Consumer Solutions

Living our values

The TELUS team works together to deliver future friendly services, and our values guide the way:



We passionately put our customers and communities first



We embrace change and innovate courageously



We grow together through spirited teamwork

Why do we have a Code?

TELUS' Code of Ethics and Conduct (the "Code") outlines the behaviours that we must exhibit in order to meet and uphold TELUS' ethical and conduct standards. The Code is intended to set the tone for how we work at TELUS and to help us recognize ethical and compliance issues before they arise and guide our response should they arise.

The Code applies to the directors, officers and employees (referred to as "team members" or "TELUS team members") of the TELUS group of companies (i.e. TELUS Corporation and all of its subsidiaries and affiliates other than TELUS International, which has its own Code of Ethics and Conduct) that are directly or indirectly controlled or managed by TELUS.

In this Code, we refer to all of these entities collectively as "TELUS". Team members, including team members new to TELUS through mergers or acquisitions, are required to review this Code at least annually to remain familiar with its terms and to adhere to them. Suppliers and contractors are subject to the [Supplier Code of Conduct](#)

To assist you in remaining familiar with the Code, please read and understand the Code, and complete the required Integrity training course each year. You must also complete any other required compliance courses in a timely manner.

The Code cannot address every possible ethical scenario we might face. Countries where TELUS operates have differing laws with which TELUS must comply, so it is up to team members to use good judgment and seek guidance from their leader or the Ethics Office when they have questions, are not sure about the right course of action, or see something that does not appear to be right. The Code is reviewed every two years and revised as necessary and we created this Code, together with our Values, to serve as your guide to acting with integrity.

Compliance with the Code is a condition of employment of all TELUS team members and any violation of this Code or any applicable law will be subject to disciplinary action, up to and including dismissal with just cause.

TELUS reserves the right to revoke or amend any term of the Code if required by the needs of the business. TELUS will notify team members of any amendments to the Code prior to the changes becoming effective.

The Code is available on the TELUS intranet (Habitat) under [go/ethics](#), and is publicly available at telus.com/CodeOfEthics.



Responsibilities

All TELUS team members

Ethical behaviour is an individual responsibility and we are all required to act in a manner consistent with high ethical standards. All team members, including team members new to TELUS through mergers or acquisitions, regardless of work location, are expected to act honestly in all their dealings, comply with the laws governing our businesses and maintain an ethical work environment. All team members have an obligation to raise issues or concerns with their leader or the Ethics Office about any suspected or known misconduct. These standards require that all team members understand and apply the guidelines in this Code to everyday actions and decisions. Failing to read or attest to the standards does not excuse us from these responsibilities.

All business activities should be able to stand up to any possible public scrutiny and further investigation if required.

The guidelines in this Code are based upon generally accepted standards of ethical business conduct and applicable laws. The absence of a guideline covering a particular situation does not relieve any of us from the responsibility for acting ethically and within the law. If ever unsure, seek advice from your leader or the Ethics Office.

Roles and responsibilities of TELUS leaders

As a leader, you must ensure that activities within your area of responsibility are carried out in accordance with the Code and all applicable Corporate Policies. While each of us has a duty to follow the Code, our leaders have an even greater responsibility as they serve as advocates for the Code with their team members.

Our leaders are expected to:

- Be familiar with the Code as well as procedures and resources available to handle ethical inquiries, complaints or violations;
- Promote and drive a culture of integrity while maintaining a climate in which honest, ethical and legal business conduct is the norm;
- Ensure that annual Integrity training, as well as any other mandatory training, is completed by all team members and that violations of the Code are addressed consistently and team members are held accountable for their behaviour at work;
- Identify risks of non-compliance with this Code within their area of responsibility and take appropriate steps to address such risks;
- Create and maintain a work environment where team members feel psychologically safe and comfortable speaking up and having open discussions without the fear of retaliation;
- Communicate regularly with their team and emphasize the importance of compliance, and demonstrate visibly and actively – through words and behaviour – their personal commitment to the Code and its policies; and
- Use our performance development process to evaluate and recognize team members not only on the business objectives achieved, but also on how they are achieved.

Team members with roles relating to internal controls over financial reporting and disclosure control

Team members who have roles related to internal controls over financial reporting and disclosure controls have the responsibility to make full, fair, accurate, timely and understandable disclosure in reports and documents that TELUS files with, or submits to, securities commissions and in other public communications made by TELUS.

Members of the TELUS Board of Directors

TELUS Board members have the responsibility to notify the Board of any potential or perceived conflict of interest, change in circumstance or other Code issues which may affect their ability to contribute to the Board as outlined in the Board Policy Manual.

All team members have an obligation to raise issues or concerns with their leader or the Ethics Office about any suspected or known misconduct.

Team members who serve or represent TELUS as directors on the boards of other organizations

In addition to the above responsibilities, TELUS team members who serve or represent TELUS on the boards of other organizations have the responsibility to notify their leader, or contact the TELUS Ethics Office, to discuss any potential or perceived conflict of interest or other Code issues which may arise during the course of their service on the other organization's board. In providing such notice, team members should exercise due care to ensure that they act in compliance with their fiduciary and other obligations to the other organization; for example, by not disclosing that organization's confidential information to TELUS, without prior written approval of that organization.

Ethics Office

The Ethics Office is established to provide team members with a resource regarding ethical and conduct matters. This office oversees the Code, conducts investigations, provides advice on ethical issues and conduct matters and develops and administers training for TELUS' expected standards of business conduct. The office reports on its activities, including on breaches of the Code, to the President and Chief Executive Officer, the Chief Financial Officer and to the People, Culture and Compensation Committee and the Audit Committee of the Board on a quarterly basis.

Integrity Work Group

An Integrity Work Group supports the Ethics Office in overseeing the Code, evaluating complaints or breaches and quarterly reporting to senior leadership and the People, Culture and Compensation Committee and the Audit Committee of the TELUS Board. Members of the Integrity Work Group include representatives from Risk Management, People & Culture, Legal Services, the Data & Trust Office, Security Office and TELUS International.

Team members should retain all documentation and save a written record of the guidance provided by their leader or members of other departments and any decision made in the event there is a future investigation with respect to a possible violation of the Code.

Failure to act in accordance with the guidelines outlined in this Code may have consequences for the individual team members, may create potential harm to TELUS' reputation and brand, and may put TELUS at risk for civil or criminal liability. Individual consequences may include disciplinary action, up to and including dismissal for just cause, as well as civil and criminal penalties. Therefore, please regard the requirement to understand and to act in accordance with the Code as a very serious obligation.

Departures from the Code (waivers)

It is not intended that there be **any** departure (i.e. waivers) from the provisions of this Code. In the unlikely event that a significant departure or waiver is considered:

- For an executive leadership team (“ELT”) member or a member of the Board, it must receive prior written approval by the Board or its Board member delegate and must be disclosed, subject to the [Policy on Corporate Disclosure and Confidentiality of Information](#).
- For any other team members, prior written approval must be received by the Chief Legal and Governance Officer, together with the Vice President Risk Management & Chief Internal Auditor and must be reported to the Audit Committee of the Board at its next meeting.

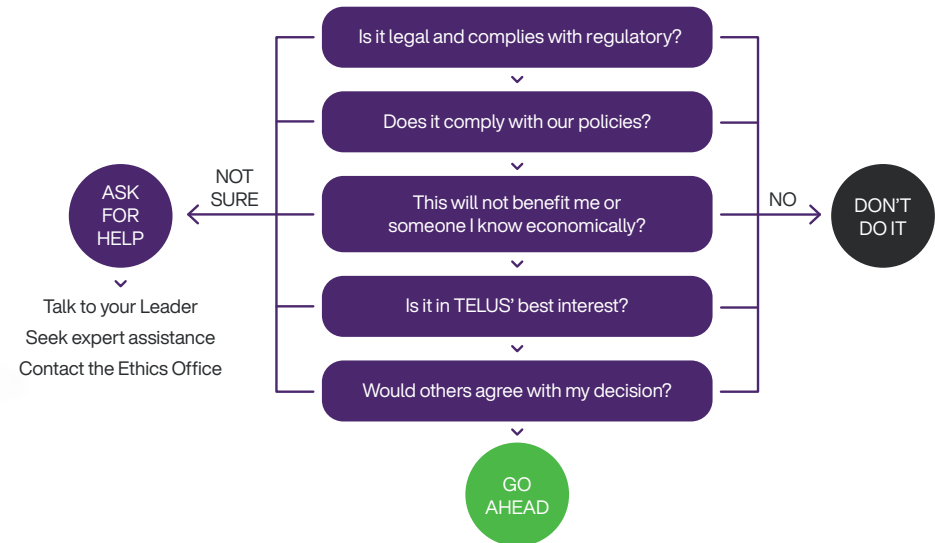
Questions or concerns?
Contact telus.ethicspoint.com



Ethical decision making and reporting issues and concerns

This Code reflects our commitment to high standards of integrity and ethical behaviour in our professional and business dealings. Each of us is responsible for ensuring our behaviour is ethical and for taking steps to resolve ethical dilemmas. The guidelines in this Code are provided to assist with ethical decision making.

If you have an ethical issue and require help, follow the process below, stopping at the point when your situation has been resolved.



1. Questions to ask yourself

Gather information and determine if the situation you face is an ethical issue. The questions below may help clarify your situation and ethical action.

- What is my immediate feeling about this?
- Does this comply with all TELUS policies, procedures and values?
- Is this legal in the country I do business in?
- Does it comply with regulatory requirements in the country I do business in?
- Is this an expectation of my job?
- How would others, including our customers, perceive this action?
- Would I or TELUS be embarrassed if this situation were discussed in the media?
- Would I be putting TELUS or myself at unnecessary risk?
- What impact would this have on my or TELUS' reputation?
- Is this directing revenue or customers away from TELUS or otherwise negatively affecting TELUS' interests?
- Does this affect my judgment or ability to act in the best interests of TELUS?

- Does this benefit me or a person somehow related to me economically?
- Does this impact TELUS economically or cost TELUS money?

We rely on all team members to use good judgment to guide behaviour and to ask questions in situations where the proper course of action may be unclear.

2. Speak with your leader

Often your leader is in the best position to help you work through the issue. Your leader is responsible for supporting open discussion, working through the ethical questions and other issues you have that touch on the Code, and guiding your access to further assistance as required. In situations where you are uncomfortable talking with your leader, or your leader is unable to help, you should refer to the next level of leadership or seek expert assistance as detailed in the next section.

3. Seek expert assistance

If you have tried the above steps but still have questions, assistance is available through designated subject matter experts in People & Culture, Legal Services, the Data & Trust Office, the TELUS Security Office, the Ethics Office, Regulatory Affairs and Corporate Accounting & Financial Reporting. Names and contact telephone numbers are listed on TELUS' internal website, Habitat, under Ethics.

4. Speaking up – raising questions or concerns

Failure to follow the Code can put our business and our stakeholders, including our customers, fellow team members and shareholders at risk. For these reasons, you are obligated to speak up promptly if you become aware of a potential or suspected violation of the Code. You may contact the TELUS EthicsLine to request ethical guidance or make a good-faith report about harassment, misconduct or a perceived violation of this Code, another TELUS policy or procedure, a law, questionable business practices, potential fraud or concerns or complaints with respect to any accounting, accounting controls or auditing matter. Making a report in good faith means your report is honest and sincere. It involves conscientiously reporting without any ulterior motives or personal vendettas. **You may choose to remain anonymous where allowed by law.** A good faith report alleging misconduct must be made promptly after the occurrence of a violation

Each of us is responsible for ensuring our behaviour is ethical and for taking steps to resolve ethical dilemmas.

or perceived violation, or after a team member becomes aware of it. Failure to file a report promptly may negatively impact TELUS' ability to evaluate, investigate or resolve the alleged misconduct resulting in potential harm to TELUS, our stakeholders and our reputation.

The EthicsLine is operated by an independent company and staffed 24 hours a day, seven days a week, by live operators who are fluent in multiple languages. EthicsLine operators document and forward reports to the Ethics Office for review and handling following each call or web contact.

- **Phone toll free: 1-888-265-4112** in North America
- **Web:** telus.ethicspoint.com or TELUS' intranet

How the Ethics Office handles inquiries

The Ethics Office will assist team members in ethical decision-making by providing guidance concerning the Code. The Ethics Office may also refer to other subject matter experts within TELUS for assistance.

How the Ethics Office handles complaints

Assessment of complaint

The Ethics Office will assess the nature of the complaint. The complaint will be reviewed under the direction of Legal Services in appropriate cases. The following matters for which other remedies exist **will not** be investigated by the Ethics Office and will be redirected as follows:

- **Labour relations issues** – the Labour Relations Consulting team and the immediate leader or other members of leadership
- **Employment issues** such as promotions, remuneration, reprimands, suspensions, dismissals – People & Culture Business Partners and the immediate leader or other members of leadership
- **Respectful workplace issues** such as harassment and discrimination – the Respectful Workplace Office
- **Customer service complaints** – Customer Care or Client Care
- **Privacy-related issues** – the Data & Trust Office for matters involving customer or team member privacy or more generally data ethics
- **Health and safety issues** – the Corporate Safety team
- Others may be redirected on a one-off basis as determined by the Ethics Office.

Investigation

All complaints to the Ethics Office are taken seriously and investigated, in partnership with TELUS Security, the Data & Trust Office or other teams where appropriate, in a timely manner. If substantiated, the complaint will be resolved through appropriate corrective action and/or discipline. If you make a complaint and choose to identify yourself, you will be notified when the Ethics Office has completed its review. Every effort will be made to maintain the privacy and confidentiality for those who contact the Ethics Office or who are accused of a breach of this Code (although disclosure may be necessary in some cases to effectively conduct an investigation, take corrective action or support legal proceedings or otherwise as required by law). At times, team members may be required to assist with internal or external investigations of alleged misconduct. We each have a responsibility to cooperate with these investigations and must never interfere with an investigation by altering or destroying related documents or evidence. Deliberately or recklessly making false complaints will result in disciplinary action up to and including dismissal for just cause.

Non-retaliation/whistleblower protection

Retaliation or retribution against a team member for contacting the Ethics Office or for assisting or participating in an investigation of a complaint violates our ethical principles and will not be tolerated. If you feel you have been retaliated against, contact People & Culture or the Ethics Office immediately.

Opportunity to respond

If it is proven that a team member has breached or has likely breached this Code, the team member will be informed of the complaint in due course. The team member will be provided the opportunity to respond and, where appropriate, to contribute to the correction of the breach.

Reporting of breaches

Any breach of the Code will be reported to senior leadership with recommendations for action. Ethical issues reported to the Ethics Office will be summarized quarterly and reported to the People, Culture and Compensation Committee and the Audit Committee of the Board, together with the results of investigations, recommendations and action.

We rely on all team members
to use good judgment to guide
behaviour and to ask questions
in situations where the proper
course of action may be unclear.

File documentation

Records of the report and investigation, including contents of meetings, interviews, results of investigations and other relevant material, will be maintained by the Ethics Office in a separate file, and managed in accordance with TELUS' Privacy Commitments and Records Retention Policy. Disclosure of information internally will be strictly limited to a need-to-know basis.

5. Last resort resolution

If an ethical issue remains unresolved, the Integrity Work Group is available to discuss and resolve any ethical issue brought forward. Every ethical issue referred to the Integrity Work Group will be reviewed and a decision will be made as to the merits of the issue or determination that no further action be taken.

Questions or concerns?
Contact telus.ethicspoint.com

Guidelines

Privacy, data and building trust

At TELUS, we build trust with our stakeholders by using data in ways that generate value, promote respect and deliver security. Our reputation relies upon our unwavering commitment to earn and maintain our stakeholders' trust. TELUS will not only meet its legal obligations but will assess whether our uses of data reflect ethical, cultural, and social norms related to the reasonable uses of data, particularly personal information.

Every team member at TELUS has an obligation to put privacy first when handling personal information. We do this by living up to the privacy commitments we make to both our customers and team members. We act in a trustworthy manner and innovate responsibly, encouraging others to trust TELUS to collect and use their data (which may include personal information). For more information about the privacy commitments that guide us, how we build trust and innovate responsibly, see the TELUS Privacy Code, the TELUS Privacy Commitment, the TELUS Trust Model and Responsible AI at TELUS.

Team members are permitted to access data under TELUS' control only where they have a legitimate business need to do so and may only use that data for that specific business purpose. Team members are not permitted to record conversations or take photographs or videos in the workplace unless they have obtained the prior consent from all parties involved or prior authorization from their leader or other TELUS leadership. Team members should contact their leader or the Ethics Office for further information about workplace recordings.

We recognize the transformative potential of technology innovations, including artificial intelligence (AI), and team members who use and deploy AI will do so in accordance with our



Responsible AI Framework. Responsible innovation helps us to serve our customers and communities better and will aid in our efforts to support a friendly future.

In addition to the TELUS Privacy Code and TELUS Privacy Commitment, various business areas of TELUS may have additional policies and practices for treating data responsibly. These include the TELUS Business Customer Privacy Commitment and the TELUS policies relating to the privacy of personal health information. Refer to your leader for more information.

Personal integrity

Individually and collectively, our personal integrity supports the honest use of TELUS resources such as time, funds, property and assets in dealings with co-workers and others and in delivering on our Customer First priorities. Business needs must take priority in the allocation of our time at work. Company time and resources, irrespective of where we work (our declared “Work Style”) are to be used for business purposes unless otherwise authorized by the appropriate leadership. While we respect the privacy and autonomy of our team members in their personal lives, their actions, both in the workplace and outside it, have the potential to negatively impact TELUS’ reputation.

Fraud

We have a zero-tolerance stance with regard to instances of confirmed fraud. As team members we will not engage directly or indirectly in fraud, including account falsification, abusive sales practices, expense fraud, time fraud, or any other fraudulent practices or reporting. If you are approached by anyone who you feel is or may be suggesting engagement in fraudulent activities, or if you are aware of situations that may involve fraud, you must report the incident to your leader or contact the Ethics Office.

We build trust with our stakeholders by using data in ways that generate value, promote respect and deliver security.

Examples of fraudulent or otherwise improper activity include:

- Altering sales agreements, submitting false sales claims, use of ineligible sales codes or creating fictitious accounts to meet objectives and earn sales incentive payments
- Adding or modifying products or services on a customer’s account without their knowledge, understanding or authorization
- Presenting false medical information for sick leave or disability benefits or participating in any activities, including travel, that are inconsistent with your medical restrictions and limitations
- Falsely reporting time worked to earn more pay or to avoid discipline for being late or absent from work
- Submitting fraudulent benefits claims to TELUS’ service providers
- Failing to exercise due diligence to properly authenticate potential purchasers, especially where there are high volume sales involved
- Working a second job while on sick leave without authorization from your leader
- Misuse of a corporate credit card for personal transactions.

Travel and expenses

TELUS funds may only be used for legitimate business purposes. We must follow TELUS policies regarding allowable expenses, expense limits, the use of corporate credit cards, preferred travel vendors, management approvals, receipts, expense reports and other travel-related matters, and we are expected to truthfully, accurately and completely record our expenses in a timely manner. See the Travel & Expense Policy for more information about the rules and guidelines regarding allowable and permitted expenses.

Compliance with domestic and foreign laws

Team members should understand and comply with the laws that relate to their work including the Charter of the French Language, which sets out certain obligations relating to the use of the French language in Quebec and guides the Policy on TELUS and the Charter of the French Language. TELUS is committed to fostering a French working environment in Quebec and to serve customers in the language of their choice, to respect their needs and fundamental rights.

It is the responsibility of leaders to ensure that members of their team are aware of their responsibilities in this regard and to seek advice from Legal Services, People & Culture, Regulatory Affairs or Taxation if they are unsure, especially for transactions that cross international borders or involve foreign laws.

Team members should be aware that many countries have laws that regulate the import and export of goods, services, software and technology for a variety of reasons, including national security and foreign policy.

Team members are permitted to access data under TELUS' control only where they have a legitimate business need to do so and may only use that data for that specific business purpose.

Questions or concerns?
Contact telus.ethicspoint.com



Competing ethically, lawfully and fairly

We consciously apply high standards of courtesy, professionalism, fairness and honesty when dealing with partners, suppliers, customers and competitors. We will report unethical practices by any other party to our leader or the TELUS EthicsLine.

Improper payments

We strictly prohibit any form of facilitation payments or other types of bribery, gifts and benefits that are illegal, improper or otherwise outside TELUS' acceptable guidelines, including kickbacks. Team members are prohibited from participating in these types of activities in any way either directly or indirectly through an agent or third party. Local customs do not provide an exception to this requirement. Team members should be aware there are national and international laws regarding bribery and corruption that apply to TELUS and that have significant potential civil and criminal penalties for violations.

Further guidance on identifying and avoiding facilitation payments, bribes and other forms of improper payment or benefit activities is provided in the [Anti-Bribery and Corruption Policy](#).

Money laundering and terrorist financing

TELUS does not permit or enable money laundering, the funding of terrorism and/or other criminal activities. We conduct business only with partners, suppliers and customers involved in legitimate business activities with funds derived from legitimate sources. Money laundering is attempting to conceal the true origins of funds originating from criminal activity. Everyone at TELUS must obey laws prohibiting money laundering and report any suspicious activity or behaviour to the Ethics Office.

Protection of third-party information

We do not improperly seek corporate trade secrets or confidential information belonging to others. If we receive unsolicited information that appears to be another party's corporate trade secrets or confidential information without the owner's consent, we will immediately inform our leader and not copy, distribute or use it until we have obtained guidance from our leadership and/or Legal Services. Team members or contractors who have worked for a partner, supplier, customer or competitor will not be requested to provide confidential information about that party. This does not preclude gathering information with the owner's consent or from the public domain. Team members should refer to the TELUS Code of Conduct for Business Sales Activities for further details. TELUS respects and protects the security and integrity of confidential information, whether the information belongs to TELUS, other team members, contractors, suppliers, community partners, customers or competitors.

Fair competition

Compliance with competition laws and fair competition is part of our way of doing business and is important to our business strategy. We are committed to lawful competition based upon the merits of our products and services and do not support any agreements or actions that restrict or

impede fair competition in contravention of applicable law. Competition (anti-trust) law is complex and global in reach, and its application depends on the facts of a particular case. Team members should exercise extra caution if they work in roles that have a higher risk for violating competition laws, including sales, marketing, pricing determination, and if they are in a senior leadership position. Activities with heightened competition law risks include:

- Establishing terms and conditions as well as pricing and promotional strategies for TELUS products and services
- Developing advertising materials for TELUS products and services
- Negotiating, communicating or interacting with competitors
- Handling or using data about competitors
- Participating in trade associations that include competitors as participants
- Selecting or negotiating with vendors.

Team members performing these functions should consult with Legal Services for appropriate advice and specific guidelines to address relevant competition law issues that are applicable to their situation. Team members are also required to report to Legal Services any contravention or suspected

breach of competition law requirements. It is essential to involve legal counsel early in the process of developing new commercial initiatives given the many uncertainties that can arise in the application of this area of law. Team members should refer to the Competition Law Guidelines for further details.

We will report unethical practices by any other party to your leader or the TELUS EthicsLine.

Dealing with governments

When interacting with government officials, we follow high ethical standards and act in a transparent manner. Team members working with governments and government officials must be aware of legal, regulatory and policy requirements in such areas as lobbying, gifts and benefits, conflict of interest, bribery and corruption, hiring ex-government employees and procurement processes. Team members should refer to the TELUS Code of Conduct for Business Sales Activities and the [Anti-Bribery and Corruption Policy](#) for further details.

Political activities

As private citizens, we are free to engage in political activities and support causes, candidates or political parties of our choice. However, without the necessary prior and express TELUS approvals, TELUS must not be associated with personal political activities, including personal political contributions. For more information, please see political contributions in the [Anti-Bribery and Corruption Policy](#).

Charitable donations

Corporate Citizenship and Community Investment provides guidance for TELUS' charitable donations. Corporate charitable donations must follow the established approval process and guidelines, which include compliance with all applicable laws, this Policy and other related policies including the Anti-Bribery and Corruption Policy and the TELUS Corporate Sponsorship Policy.

Proprietary rights and assets of others

We respect the proprietary rights and assets of others including both tangible properties and intangible assets such as those protected by intellectual property rights. We respect licences and conditions of use that apply to the intellectual property of others. Copyright materials are not copied in whole or in part, or used in violation of any law or agreement with vendors, licensors or any other party.

Involvement in a legal matter

If you are involved in a legal matter, whether of a civil, criminal or regulatory nature, that has the potential to affect your ability to perform your job or harm the reputation or interests of TELUS, you must immediately inform your leader.

If a team member comes across a suspected illegal activity or material (e.g. child pornography) in the course of their work, they should report it immediately to the TELUS Security Office, which will determine the appropriate course of action such as reporting to the appropriate authorities.

Improper influence on the conduct of audits

Team members, or any person acting under the direction of a team member, are prohibited from directly or indirectly taking any action to improperly influence, coerce, manipulate or mislead the TELUS' external or internal auditors or their representatives.

Questions or concerns?
[Contact \[telus.ethicspoint.com\]\(mailto:Contact.telus.ethicspoint.com\)](mailto:Contact.telus.ethicspoint.com)



Respectful workplace / human rights

TELUS is committed to creating an inclusive workplace and leveraging the diversity of thought that exists within our teams with the goal of fostering a universal sense of belonging at work. We are committed to treating all current, potential and past team members, as well as all partners, suppliers, shareholders and customers (and other stakeholders) with dignity, respect and fairness.

At TELUS, we aim to prevent unhealthy conflicts or unacceptable behaviors. When these issues do occur, we need to recognize and resolve them in a way that minimizes any negative impact on our team members.

TELUS' Respectful Workplace Policy outlines unacceptable behaviours (including discrimination and harassment) and expectations of all team members of TELUS. It applies to behaviours that have the potential to negatively impact the workplace, adversely affect employee relationships or lead to adverse job-related consequences for the impacted individual(s).

This may include behaviour that occurs during or outside of working hours, and in any location where work-related interactions take place, whether physical or virtual, including on social media. It also includes circumstances where domestic violence would likely lead to physical or psychological harm in the workplace. While customers, suppliers and other stakeholders are not directly subject to our internal policies, TELUS expects respectful and non-discriminatory behaviour from them, as we do from our own team. At TELUS, all team members are expected to act professionally and respectfully and intervene or seek support to minimize and resolve unacceptable behaviour impacting the workplace.

When team members experience or become aware of unacceptable behaviour, including as a bystander, they have a responsibility to report it to their leader and/or the Respectful Workplace Office (RWO) at [go/respect](#). TELUS will address the behaviour confidentially and in a timely manner, in accordance with applicable legislation and TELUS policies, to restore a physically and psychologically safe workplace.

Because of their influence and authority, leaders are responsible for modelling the highest standards of behaviour, taking action to prevent and resolve unacceptable behaviour, and setting the tone for healthy workplace interactions. When a complaint is shared with a leader, the leader is responsible to notify the RWO for guidance on addressing the issue.

A failure to meet these expectations may result in disciplinary action, up to and including dismissal for just cause. Team members are encouraged to contact their leader or the RWO if they have any questions about their rights or responsibilities.

Our teams operating outside of Canada are governed by the laws of the countries where they operate, and will adapt the Respectful Workplace Policy as appropriate in accordance with local human rights and workplace safety laws. Team members are referred to the [Respectful Workplace Policy](#) for more information.

Valuing diversity and inclusion

We believe that our team members are our greatest asset. TELUS' commitment to diversity and inclusion (D&I) is at the core of our culture, embedded in our values and central to our leadership in social capitalism. We recognize that in all areas of our business, different perspectives, experiences and backgrounds bring innovative ways of thinking that help us drive better decision making, insights and solutions. We are all responsible for helping maintain a workplace where everyone feels valued and encouraged to contribute – an environment where all of us have an equal opportunity to succeed. Please visit [go/diversity](#) for further details.

TELUS is committed to creating an inclusive workplace and leveraging the diversity of thought that exists within our teams with the goal of fostering a universal sense of belonging at work.

Our commitment to inclusiveness includes the provision of workplace accommodation related to protected human rights grounds in accordance with the law to allow everyone access to meaningful work. Canadian team members can find more information in the Workplace Accommodation Policy.

Health and safety

We are committed to healthy and safe operations in all our locations to protect the lives and health of our team members, protect our assets, ensure business continuity and engender public trust. When working on customer premises and in public locations, we prioritize team member safety and take necessary steps to safeguard the rights and safety of the customer and other members of the public.

We have operating standards, practices, systems, training, reporting and resources to implement the [Health and Safety Policy](#).

Team members must be always fit for work during working hours and when operating company vehicles or equipment.

A failure to meet this requirement as a result of consuming alcohol or drugs (including prescription or over-the-counter drugs) is a violation of the Alcohol & Drug Policy and must be immediately addressed. Team members are expected to immediately report any observations of a potential violation

of the Policy, and are referred to the TELUS Alcohol and Drug Policy for further details. Consumption of alcohol at corporate functions and in business settings must be managed in accordance with the Alcohol and Drug Policy.

Voluntary employment

All employees' work is voluntary, and employees may choose to terminate their employment at any time, subject to required notice. TELUS does not use child labour in any part of our business operations and complies with statutory and local requirements for the minimum age of employment.

Employment standards

Compensation paid to employees complies with all applicable employment standards, including those relating to minimum wages. Where no statutory employment standards exist, employees are paid at least the minimum local industry standard. Deductions from wages as a disciplinary measure are not permitted.

Contributing to our communities

We are committed to supporting the communities where our team members live and work. We encourage team members to give back to their local communities by volunteering and participating in charitable activities, such as TELUS Days of Giving.

While representing TELUS and contributing to our communities, we must:

- Adhere to TELUS' values and uphold the standards in this Code
- Ensure that these outside activities do not interfere with our job performance or create a conflict of interest
- Obtain guidance through the Community Investment team before donating TELUS funds or making contributions in TELUS' name
- Make it clear that the views expressed through our participation in community activities are our own personal views, not those of TELUS.

All team members are expected to act professionally and respectfully and intervene or seek support to minimize and resolve unacceptable behaviour impacting the workplace.

Environment, social and governance (ESG)

TELUS' values and social purpose are demonstrated by our compliance with applicable legal and regulatory requirements as well as our actions and objectives relating to many environmental and social issues such as climate change and human rights.

Acknowledging the impact our business has on society, we strive to integrate environmental and social considerations into our governance and risk management processes. Team members are encouraged to consider environmental and social impacts in their decision making and strategic planning as well as in our operational activities.

Detailed information on our [Environmental Policy](#), our ISO 14001:2015 certified Environmental Management System and other environmental compliance and information resources can be found on TELUS' intranet at go/environment. Detailed information on our sustainability and ESG strategies and progress can be found in our [Sustainability and ESG Report](#).

Questions or concerns?
Contact telus.ethicspoint.com



Company assets and information

Company information

Unless specifically published for external use, all corporate records, information, intellectual property, reports, data, plans, processes and methods, including information posted on internal websites, are considered TELUS information and should not be disclosed without proper authorization. Access should be limited to those team members with a legitimate business reason to know the information. Team members should refer to the Data Classification and Handling Standard in the Security Library for further details on classification and the Security Policies for further details on the safeguarding of TELUS' information assets.

Team members and past team members must not use or disclose TELUS trade secrets, competitive information or other confidential and/or proprietary information to benefit themselves or others or for the purpose of competing with TELUS. In situations where we would be willing to share confidential information, Legal Services can assist in preparing a confidentiality agreement or licence agreement to protect TELUS. Team members departing TELUS must not copy, download, forward or share TELUS' strategy or information, irrespective of document classification.

To protect the safety and integrity of our networks, only approved software is to be used on TELUS equipment. No team member should knowingly install or use a software program or code that could damage TELUS' information assets. All team members are responsible for taking reasonable measures to ensure that software and data is clear of malicious code and safe for use in TELUS' electronic data processing environment.

Team members should also refer to the Security Library which outlines the security policies, standards, best practices and guidelines that team members are to adhere to in their day-to-day operations in order to keep TELUS secure.

Public disclosure

TELUS is subject to strict securities rules regarding disclosure of financial and other material information to the public. Selective disclosure of confidential information by any team member can create liabilities for TELUS and for that team member. All discussions about TELUS in a public environment should comply with the [Policy on Corporate Disclosure and Confidentiality of Information](#), to which team members should refer to for further details. For more information, contact Investor Relations or Corporate Communications.

Examples of situations that may lead to inappropriate public disclosure include:

- Participating in an investment-related discussion forum, social media platform, chat room, or blog. Team members must not discuss any confidential information about TELUS when participating in these activities on line. Refer to our Social Media Guidelines.
- Discussion regarding TELUS with a member of the investment community or the media must be referred to team members specifically trained and authorized to communicate on behalf of TELUS. For further information, contact Investor Relations or Corporate Communications.
- Presentations to business, educational or community groups must be pre-approved and provided in advance

to Investor Relations and Corporate Communications for review where requested by them.

- For presentations to internal TELUS audiences, team members should confirm with their leader if such presentations include confidential or sensitive information.

Business records and internal accounting controls

Accurate and reliable records are essential to enable us to meet our business, legal and financial obligations. We strive to ensure all records and other data (whether for external or internal use), are factual, complete, timely and understandable. This includes hours worked, invoices, benefit claims and travel and expense reimbursement reports. Inaccurate or unsubstantiated records may be treated as fraud. Restricted and confidential information should be properly identified and respected as such as outlined in our Security Policies.

TELUS has defined processes for properly handling data and records throughout their life cycle to comply with business needs and legal and regulatory requirements. Team members should refer to the Records Retention Policy for guidance on minimum and maximum retention periods, creating, collecting, using, retaining, storing and disposing of data and records, suspension of disposal due to a potential or on-going legal matter or investigation and where to obtain further information.

Financial transactions

All team members are expected to understand their role and responsibility for the Company's financial transactions and records and follow approved procedures to protect, report, control and accurately reflect these transactions. Refer to the Signing Authority Policy and other TELUS Finance policies for further details. We do not tamper with the network or systems to bypass billing nor make unauthorized charges or credits to customer accounts.

Team members whose duties involve authentication and approval are responsible for the close scrutiny and timely verification of all documents upon which monies are paid or received in compliance with TELUS policies.

Safeguarding assets

TELUS assets can take many forms and we are responsible to protect them at all times, against loss, theft, damage, vandalism, neglect, unauthorized use and unauthorized disposal. Of note, the Work Styles program is only available in Canada and if you are required to work out of the country, you must have security and leadership approvals in advance to ensure assets are protected at all times. Assets include, but are not limited to:

- **Informational assets** include data related to our business, like a database of customer names and contact details

- **Financial assets** include money and other financial instruments
- **Tangible or physical assets** include material things that enable us to do our jobs, like computers, mobile phones, supplies, tools, company vehicles, TELUS facilities, information, and office supplies
- **Intangible assets** include non-physical things like ideas, trademarks, patents, time and our reputation.

Team members are the first line of defense in protecting TELUS assets and information and are expected to take reasonable measures to safeguard access credentials such as passwords, identification cards, keys, and hand-held user authentication devices. It is also important that we do not share our TELUS-provided devices or their access credentials and MFA tokens, and we do not compromise site security by leaving access doors open and unattended.

Intellectual property

We work together to protect our intellectual property just as we protect other TELUS assets and information as noted above.

Intellectual property rights enable TELUS to be known and recognized in the marketplace and help distinguish our products and services from those of our competitors. Intellectual property rights also protect the valuable

intangible assets generated or acquired by the TELUS team. Examples of TELUS intellectual property include brands and logos (trademarks); software, artwork and marketing material (copyright); and inventions and business innovations (patents).

TELUS owns all intellectual property created by its employees and contractors and ownership of such intellectual property is documented. Unless specifically published for external use and/or public dissemination has occurred, all TELUS records are considered corporate information and should not be disclosed without proper authorization.

Team members should contact Legal Services for further information about intellectual property matters or the Brand Office for information on use of our brand. Additionally, team members dealing with any TELUS legal matters should contact Legal Services.

Personal use of communication devices

Communications equipment and devices (TELUS' or our own) are used for both business and personal purposes. Electronic communication may occur via a wide range of devices including, but not limited to, computers, telephones, smartphones and webcams. This can take the form of emails, texting, Internet searches, photographs, videos, audio files, blogs, social networking, peer-to-peer file transfers and physical exchange of media (e.g. USB storage devices).

As we communicate in any of these ways, we may identify ourselves as TELUS team members either by naming TELUS or by virtue of email or IP addresses.

While we permit team members to use TELUS-provided communications equipment and devices for personal purposes, such use should be limited, should not interfere with our duties or negatively impact TELUS in any way. We expect any such personal use to take place on personal time, or during reasonable permitted breaks from work, subject to your leader's approval and the needs of the business.

Team members must comply with all TELUS policies when using TELUS-provided communication devices for personal use, and should refer to the Security Acceptable Use Policy for further information.

TELUS uses automated tools to log team member use of its networks (e.g. voice, email, messaging, intranet and internet) and related equipment and devices and to monitor traffic (including content) on its networks in order to detect security threats and other problems. While TELUS does not actively monitor employee email, messaging, telephone and internet access, TELUS does reserve the right to do so. Note that improper use of TELUS' networks, equipment or devices may result in disciplinary action up to and including dismissal for just cause.

Use of social media

Social media includes any digital communication channels that allow individuals to create and share content and post comments. We encourage communication among our team members, customers and partners through social media. However, as a TELUS team member, you must comply with our social media guidelines ([go/socialmedia](#)), use good judgment and be polite, respectful and mindful of the content created, shared and posted, remembering that the internet is a public place.

As a TELUS team member, you should adhere to the following:

- When posting about TELUS, always disclose that you are a TELUS team member and use the #TeamTELUS hashtag to help identify yourself.
- Any new social media handles that you create must be personal only and not include the TELUS name or branding in the handle, bio or content. Only the Brand Marketing and Social Media team is authorized to create new, official social media accounts for the business.
- Do not rate or review TELUS products and services on platforms like the App Store or post reviews on aggregate sites to artificially boost a product's score. Doing so can result in legal ramifications for TELUS.

We encourage communication among our team members, customers and partners through social media.

- Do not disclose information that is confidential to TELUS or provided in confidence to TELUS, including upcoming promotions, device launches, internal communications or financial information, including quarterly or annual results and forward looking information, until the information has been made public by TELUS.
- Sharing information about services or offers on your personal accounts is acceptable; however, do not claim that you can provide better customer offers than what is available in store or online, and always disclose your association with TELUS.
- Although team members are encouraged to share offers or promotions on social media, you cannot gather personal information, such as phone numbers, email addresses or any contact information for the purpose of generating sales. If someone is interested in an offer, tell them to direct message any of the official TELUS social media accounts or reach out to our support team on X (previously Twitter).

- Show respect towards other persons and organizations, and avoid defamatory, discriminatory, harassing or sexual messages. We do not tolerate any form of bullying by team members on social media.
- If you disclose TELUS as your employer in social media, be cognizant of the personal content you interact with that could be considered offensive to others, whether that be sharing, liking or commenting on posts. Although these are your personal accounts, the content could be perceived negatively toward TELUS.
- Do not display the TELUS logo or brand images in personal communications or as background images on your profile without written permission from the Brand Marketing and Social Media team. We do, however, encourage team members to create their own content, reshare messages from Amplify and follow, retweet, and/or share approved content from the official TELUS social media handles.

For additional information regarding our team member policies, you can visit the social media guidelines at [go/socialmedia](#) or contact the Social Media team at socialmedia@telus.com.

Questions or concerns?
Contact telus.ethicspoint.com



Conflict of interest

What it means

As team members, we must avoid situations or relationships that conflict with the interests of TELUS and our duties to TELUS. A conflict arises whenever we allow or appear to allow personal interests or relationships to impair our judgment and ability to make work-related decisions with integrity and honesty.

Why it matters

By thinking of ourselves first, we may act in a way that is damaging, or potentially damaging, to TELUS. We may also harm our personal reputation. In such circumstances, team members must take action to eliminate the conflict of interest or the perception of a conflict of interest.

How we do it

We make business decisions based on what is in the best interest of TELUS and not our individual interests. Team members must disclose actual or potential conflicts of interest to their leader or the Ethics Office. Each situation must be considered individually and regularly reviewed on the parties involved, level of access to business information, decision-making authority, job duties/responsibilities, position within the organization and potential impact on others. If team members find themselves in a conflict or are unsure of whether a situation would be deemed to be a conflict of interest, they should complete a [Conflict of Interest Disclosure Form](#) available on TELUS' intranet which will be submitted to the Ethics Office. Remember, having a conflict of interest is not necessarily a Code violation, but failing to disclose it is.

The following are common situations team members may encounter which could present a conflict of interest.

Family members and personal relationships

A conflict of interest may occur when a team member has the ability to enhance or promote the interests of a family member or other close personal connections.

Situations may arise where broader familial relationships, friendships and other close personal associations (e.g. persons residing in the same household as the TELUS team member) cause real or perceived conflicts of interest or the possibility of real or perceived improper influence. Team members should be sensitive to these concerns and demonstrate good business judgment in the best interest of TELUS and in keeping with the spirit and intent of this Code.

TELUS Board members must disclose any family or personal relationship with TELUS team members or with TELUS job applicants to the Chair of the Corporate Governance Committee of the Board in order that the Committee may determine whether the relationship impacts the Board member's independence.

Board members, executives and senior leaders have a duty to disclose whether they have a relationship with TELUS' external auditor.

Personal gain

Conflict of interest may occur when a team member or family member gains a personal benefit from:

- a) a business relationship with TELUS, or
- b) an outside business where TELUS has a relationship such as a partner, supplier, customer, competitor, contractor, consultant, agent or dealer.

This personal benefit may arise from an ownership interest in, or a role as a director, officer or employee of, an entity that is engaged in a business relationship with TELUS.

This guideline does not prohibit team members from holding publicly traded shares of an entity with which TELUS has a business relationship or a competitor provided that the team member does not have a significant investment in the entity and does not acquire the shares based on material undisclosed confidential information obtained as a result of employment with TELUS or by being a member of the board of directors of a TELUS company.

To prevent conflicts of interest, team members may not:

- Be involved in any negotiations or transactions on behalf of TELUS with partners, suppliers, customers, contractors, consultants, agents or outside parties where the team member has a personal, commercial or financial interest in the outcome of the negotiations, or transactions unrelated to their role at TELUS.

- Participate in a decision to hire, transfer or promote a family member, or someone with whom they have a romantic or sexual relationship, or be in a position of direct or indirect influence over a family member who is an employee or contractor of TELUS.
- Supervise a family member or have direct or indirect authority over employment or contract-related decisions that impact a family member or someone with whom they have a romantic or sexual relationship, such as pay, performance ratings, work assignments, discipline, training or termination.
- Access or make adjustments to their own accounts or services of family members, friends, co-workers or acquaintances without authorization from their leader.
- Work for, or be contracted to, an independent TELUS dealer or a provincially regulated TELUS entity, such as TELUS Retail Limited and TELUS at the same time.

Team members must disclose actual or potential conflicts of interest to their leader or the Ethics Office.

Ethical sales practices

Team members share a commitment to delivering on our Customers First priority, which includes being consistently mindful of our professional conduct and ethical sales practices, including our obligations under our Code of Conduct for Business Sales Activities. We need to ensure when selling to a customer that we provide the customer options that will allow them to make informed choices on the products and services that best meet their needs. We do not direct customers to sales that are not aligned with their requirements and we do not make any changes or modifications to their account without their consent, understanding and permission. Team members who are involved in selling or attempting to sell to existing and potential customers in the private or public sector, share a commitment to conduct business lawfully and with integrity. This includes honest submission of claims for commission purposes.

Outside employment and other non-TELUS activities

Team members are free to engage in outside activities, including business activities on their own time. However, these activities must not conflict, or have the potential to conflict, with TELUS' best interests or with our obligations to TELUS, including our ability to perform our job. As a

general guideline, team members may not work for, or be engaged in activities for, enterprises that are competitors or suppliers of TELUS. A conflict may arise by virtue of a role that we have with another company or organization, for example as a director, officer or employee of an entity that enters into a business relationship with TELUS, even where there is no personal benefit or gain to us from the outside relationship. A conflict may also arise if, for example, we use assets such as time, our corporate phone or laptop, or tools paid for or developed by TELUS, when engaged in such outside business activities. If you are considering starting your own business, accepting a second job, or joining a board of directors, you are required to advise your leader or the Ethics Office, who will review the circumstances to ensure there is no conflict of interest. Of note, a second job cannot run simultaneously with your expected working hours at TELUS.

Team members are committed to delivering on our Customers First priority, which includes being consistently mindful, professional, and ethical.

It is a conflict of interest, irrespective of where we work (i.e., our declared “work style”) to have outside interests or responsibilities that demand so much time and energy that they interfere with our ability to complete our TELUS work. It is also a conflict of interest to use TELUS time and resources to manage such events, even if on a voluntary basis. This could include any personal, community and charitable activities that require time and effort during normal working hours, except for situations where the individual is acting in a representative capacity at the request of TELUS with the explicit and written permission of their leader.

Circumstances change, and a conflict may arise even where your leader or the Ethics Office has previously approved a relationship with an outside party. It is your responsibility to be attentive to these potential conflicts and to report any changes to your leader or the Ethics Office as they arise. In order to fulfill your obligations under this Code, you may need to step down from the outside role or make other arrangements acceptable to TELUS.

Future TELUS business

Over time, TELUS may expand into new businesses or change its product lines or services. Team members are responsible for re-examining their individual situations on a regular basis to avoid becoming involved in a conflict of interest situation where no such conflict previously existed.

Putting conflict of interest concepts into practice

To determine if you have a conflict of interest that should be disclosed, ask yourself these questions:

- Do my outside interests influence, or appear to influence, my ability to make sound business decisions for TELUS?
- Do I stand to improperly benefit from my involvement in this situation?
- Does a friend or relative of mine stand to improperly benefit?
- Could my participation in this activity interfere with my ability to do my job at TELUS?
- Is the situation causing me to put my own interests ahead of TELUS' interests?
- If the situation became public knowledge, could it negatively reflect on me or TELUS?

If you answered “yes” to any of the above questions, discuss the situation with your leader or the Ethics Office.

Insider trading

As detailed in the [TELUS Insider Trading Policy](#), team members may not trade, or recommend or encourage another person (such as a relative or friend) to trade, in shares or other securities of TELUS or of TELUS International while in possession of undisclosed material information relative to TELUS or TELUS International, as applicable. Nor may team members inform any other person of any undisclosed material information (commonly known as “tipping”) relative to TELUS or to TELUS International, except in very limited circumstances.

These prohibitions on trading and tipping also apply when you have knowledge of undisclosed material information relative to another public company that was gained during the course of your work at TELUS. Material information in respect of a publicly traded company is information that results in, or could reasonably be expected to result in, a significant change in the market price or value of any of the listed securities of that company if generally disclosed.

Please see the TELUS Insider Trading Policy and the [Policy on Corporate Disclosure and Confidentiality of Information](#) for more information. Failure to comply with these policies and with securities laws in this area will expose you personally, as well as TELUS, to liability.

Gifts, benefits and hospitality

TELUS team members shall not authorize, offer or accept, directly or indirectly, gifts or benefits that are intended to influence, or appear to influence to or from any organization or person having business dealings with TELUS other than as described below. These guidelines and the [Anti-Bribery and Corruption Policy](#) apply at all times and do not change during traditional giving events or seasons.

Accepting or offering substantial gifts from contractors, suppliers, vendors and/or community partners could be seen as presumptively fraudulent because of the potential to create undue influence. Gifts of cash or cash equivalent (such as a gift card) should not be authorized, offered or accepted, regardless of the amount. If ever unsure of an offering, please contact your leader or the Ethics Office.

Generally, team members can offer or accept a gift or entertainment as long as it:

- Does not make the recipient feel obligated or give the appearance of an obligation
- Is a reasonable complement to the business relationship
- Does not violate local law or the recipient's company's policies
- Is not solicited
- Is infrequent.

Gifts and benefits that are acceptable for TELUS team members to authorize, offer or accept in the normal course of business (and to engender goodwill and positive working relationships) are typically less than \$250 Canadian or the close equivalent in other currencies and include:

- Attendance at local sporting or cultural events
- Business lunches or dinners
- Transportation to or from a customer or supplier's place of business
- Hospitality suites
- Small seasonal holiday gifts or prizes to be used in office draws and raffles.

If you are not sure whether a gift or benefit is acceptable, ask yourself:

- Would the gift be considered customary given the nature of your role with TELUS?
- If the gift or benefit was reported in the media or to the TELUS President and CEO, would the perception be neutral or positive?
- For offers of hospitality or entertainment, is the person extending the offer attending with you?

If the answers to these questions are “yes”, based on your good faith assessment, you may accept the gift.

If the answers to these questions are “no”, you should politely decline the gifts or entertainment. If that would be difficult or embarrassing to the provider, you may be able to accept the gift, but should ask your leader or contact the Ethics Office who will work with you to either donate the item to an approved charity, or to distribute the item among your peers.

It may be appropriate to attend third-party paid seminars or conferences or vendor-hosted events on behalf of TELUS, if there is a clear benefit to TELUS for attending and the attendance is approved in advance by the team member's leader. To avoid a real or perceived conflict of interest, team members should consider having TELUS fund incremental expenses (e.g. airfare and hotel) and remember that prizes given out at such events are considered gifts and should follow the same gifts and benefits guidelines as outlined above.

Team members with supplier selection, negotiation, purchasing or contract management roles within TELUS are subject to more stringent professional purchasing requirements regarding gifts and benefits and maintaining appropriate relationships with suppliers and should therefore not accept any gifts or benefits from suppliers

or potential suppliers without the explicit and written permission of their leader. Where the value of any gift or benefit is \$250 or greater, the leader must also provide a copy of their authorization of that particular gift or benefit to the Ethics Office, including a description of the gift or benefit, approximate value, the name of the party conferring the gift or benefit and the reason.

Generally, team members can offer or accept a gift or entertainment as long as it is infrequent.

Questions or concerns?
Contact telus.ethicspoint.com



Dealing with suppliers

We strive to ensure our business dealings with them are ethical and that they understand our expectations of them as outlined in our [Supplier Code of Conduct](#).

Selection and use of third parties/procurement

We expect our suppliers to meet or exceed the requirements set forth in the Supplier Code of Conduct and to cause their affiliates, suppliers, employees and contractors to perform obligations for TELUS consistent with the standards set out in the Supplier Code of Conduct.

- We award business to suppliers who are in compliance with applicable laws in their business operations, including in their relationships with their employees, their communities and TELUS.
- We select our suppliers based upon objective and fair criteria including, business need, price, service, quality, reputation for ethical conduct and health, safety and environmental business considerations.

Adherence to applicable TELUS policies

- We expect the suppliers with whom we do business to demonstrate values and standards similar to those in the applicable TELUS policies.
- We strive to ensure that our suppliers are made aware of TELUS policies that are applicable to the work for which they are being engaged.

Supplier-funded incentive programs

- Supplier-funded incentive programs, often offered to our sales team by suppliers seeking to sell their products and services, must be approved in advance by an authorized program administrator who does not work with the eligible team members.



TELUS buying policy

Every TELUS team member who commits to buy services or products from a supplier on behalf of TELUS is responsible for the prudent exercise of and adherence to internal controls; ensuring all transactions are justified and supported by business objectives; ensuring the best value for money spent; and complying with the TELUS Buying Policy. Consequently, at the beginning or renewal of every supply arrangement, team members are required to protect the best interests of TELUS by performing a risk assessment on our potential or continuing suppliers and performing additional mandatory due diligence commensurate with all identified risk. For more information, please visit Supplier Due Diligence on [go/marketplace](https://go.marketplace.telus.com).

Questions or concerns?
Contact telus.ethicspoint.com

Review guidelines and policies

If you need further assistance, consider the following additional policies as they may apply to your situation.

Alcohol and Drug Corporate Policy

Anti-Bribery and Corruption Policy

Code of Conduct for Business Sales Activities

Competition Law

Policy on Corporate Disclosure and Confidentiality of Information

Environmental Policy

Hiring Processes and Guidelines

Insider Trading Policy

Policy on TELUS and the Charter of the French Language

Buying Policy and Procedures

Records Retention Policy

Respectful Workplace Policy

Security Acceptable Use Policy

Signing Authority Policy

Social Media Guidelines

Supplier Code of Conduct

Supplier Due Diligence Policy

TELUS Corporate Sponsorship Policy

TELUS Health and Safety Policy

TELUS Health Privacy Policy

TELUS Health Privacy Commitment

TELUS Privacy Commitment

TELUS Security Policies, Standards, and Best Practices

Team Member Privacy Commitment

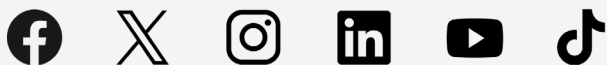
TELUS Privacy Code

TELUS Team Member Travel & Expense Policy

Workplace Accommodation Policy

Work Styles Policy

Questions or concerns?
Contact telus.ethicspoint.com



telus.com/CodeOfEthics