

Pursuant to the Articles of Association of Telekom Slovenije, d.d. and taking into account the Corporate Governance Code for Companies with Capital Assets of the State and the recommendations and expectations adopted by Slovenski državni holding, d. d., the Management Board of Telekom Slovenije, d.d. adopted the following on 22 September 2020:

## **POLICY ON COMMUNICATION WITH THE SHAREHOLDERS OF TELEKOM SLOVENIJE, D. D.**

### **1. Purpose and objective**

The Policy on communication with shareholders (hereinafter: the Policy) shall define the method of communication with the shareholders of Telekom Slovenije, d.d. (hereinafter: Telekom Slovenije or the Company).

In communications with shareholders, Telekom Slovenije shall comply with valid legislation regarding the necessary and relevant notification of interested parties with respect to all information that affects or could affect the price of financial instruments, specifically the shares of Telekom Slovenije with ticker symbol TLSG. This means that the Company shall ensure, in accordance with the relevant legislation, that all stakeholders are provided key business information relating to the Company at the same time and in the same manner.

The aim of this Policy is to ensure timely, continuous, transparent and equitable communication with the Company's shareholders.

### **2. Communication with shareholders in connection with public announcements**

Telekom Slovenije shall ensure the equal treatment and consistent exercising of the rights of all shareholders through its corporate governance system and communication strategy for shareholders and other stakeholders.

#### ***Public announcements***

The key channels used to notify shareholders shall be public announcements in the Ljubljana Stock Exchange's SEOnet system (hereinafter: the SEOnet system), the annual report and General Meeting of Shareholders. The Company shall publish the annual report, the convening and materials for the General Meeting of Shareholders and all other sensitive business information that could affect the price of financial instruments in the SEOnet system in the shortest time possible. The wording of all public announcements and other documents shall follow the stock exchange's recommendations to public companies regarding notification, as well as the principles of accuracy, relevance and clarity.

#### ***Financial calendar***

By the end of November of an individual year, the Company shall publish its financial calendar for the next financial year in the SEOnet system. That calendar shall include a list of dates of the publication of the annual report and corporate governance statement, quarterly business reports, the convening and date of the General Meeting of Shareholders, resolutions of the General Meeting of Shareholders and the potential payment of dividends. The Company shall publish all changes to the financial calendar in the aforementioned system in the shortest time possible.

#### ***General Meeting of Shareholders***

The Company shall convene the General Meeting of Shareholders at least once a year, when it benefits the Company or whenever required in accordance with the law and its Articles of Association. The date that the convening of the General Meeting of Shareholders is published on the website of the Agency of the Republic of Slovenia for Public Legal Records and Related Services shall be deemed the official date of that convocation and the date from which the deadlines set out in the Companies Act (ZGD-1) apply. Shareholders shall exercise their rights at the General Meeting of Shareholders in person or through authorised representatives. The convening, competences and functioning of the General Meeting of Shareholders are set out in the ZGD-1, the Company's Articles of Association and the rules of procedure

of the General Meeting of Shareholders. The Company's Management Board and Supervisory Board shall provide information at the General Meeting of Shareholders in accordance with shareholders' right to information under the ZGD-1.

#### ***Annual report***

In accordance with the law and recommended practices, the Company shall publish the annual report of the Telekom Slovenije Group and Telekom Slovenije prior to the General Meeting of Shareholders at which the written report of the Supervisory Board on the confirmation of the annual report will be presented to shareholders. The annual report is a key corporate document through which the Company and Telekom Slovenije Group shall be presented to stakeholders in the context of operations and achievements. In that report, the Company shall publish all information envisaged by the law, as well as information and explanations of facts and events in the interest of shareholders and the Company, and the disclosure of relationships with stakeholders and the level of its social responsibility.

#### ***Corporate governance statement***

The Company shall present in detail its governance practices in the corporate governance statement, which it shall compile in accordance with the ZGD-1, and the recommendations of the Corporate Governance Code and the Corporate Governance Code for Companies with Capital Assets of the State. The corporate governance statement shall be an integral part of the annual report, and shall be published as a separate statement in the SEOnet system and on the Company's website.

#### ***Periodic business reports***

At the end of every quarter, the Company shall publish the business report of the Telekom Slovenije Group and the Company in accordance with the financial calendar. The main content of periodic business reports shall be as follows: a presentation of the Company and the Telekom Slovenije Group, important business data and performance indicators, an overview of significant events during a given period, risk management and an interim financial report for the Company and the Telekom Slovenije Group.

#### ***Summary of the strategic business plan***

Following the completion of the strategic planning period, the Company shall publish information in the SEOnet system regarding the key strategic policies of the Company and the Telekom Slovenije Group for the coming period. That information shall be prepared as a summary of the strategic business plan, which shall include primarily the following: a presentation of the Company and the Telekom Slovenije Group, and the mission, vision and values, key strategic policies and key performance indicators for the next financial year. The summary of the strategic business plan shall be available to shareholders after it has been adopted by the Company's Management Board and Supervisory Board.

#### ***Presentations for investors***

The Company may be invited by the Ljubljana Stock Exchange and other organisers or organise itself a meeting with existing and potential investors, which may include the Company's shareholders. The Company shall only provide general or previously published information at such meetings.

### **3. Communication with shareholders at the request of a shareholder outside of the reporting system**

The Company shall only communicate to shareholders the information defined in this Policy. If the Company receives a request from a specific shareholder for other information, it shall not disclose that information to the shareholder in question, except in justified cases in which the Company assesses otherwise. However, the company shall also publish that information in such cases. If the Company communicates information that has not been published to a specific shareholder outside of the General Meeting of Shareholders, it shall publish that information or inform shareholders that they may request the same information.

If the Company receives a question from an individual shareholder and responds, and that response only includes information that has already been published, the Company shall publish that question and associated response on its website.

If a subsidiary of Telekom Slovenije receives a request from a shareholder of Telekom Slovenije, this Policy shall be applied *mutatis mutandis*, where the competent organisational units of Telekom Slovenije shall be included in all phases of the process.

#### **4. Final provisions**

This Policy shall enter into force and apply to all Telekom Slovenije Group companies on the day it is adopted by the Management Board.

This Policy shall be published on the Company's intranet site and its public website in Slovene and English.

Tomaž Seljak, MSc  
President of the Management Board