



## **Employee Inquiry Policy**

Bezeq - The Israel Telecommunications Corp. Ltd.

#### Introduction

We encourage open communication in the Company, and are interested in allowing consultation with the Company's control and audit entities, safely and with different contact channels. Applicants may choose to apply anonymously or by name. We attribute great importance to the employees' ability to hold an open dialogue, and have established official consultation mechanisms within the Company as another pillar to support our efforts to uphold ethical conduct in all aspects of the Company's activities, which is regulated by the public code of ethics, "Our Way of Doing Business, Bezeq's Code of Business Ethics", and is embedded in the Company's corporate culture.

### **Access and goals**

This document presents the Company's policy and describes how Bezeq allows the Company's employees to contact the relevant entities in the Company and how their application will be addressed.

### **Reporting process**

According to our Code of Ethics, Bezeq encourages its employees to share and consult with their managers or the relevant managers regarding any topic that makes them uncomfortable, or raise any concern about inappropriate behavior on the part of the Company or any of its employees.

In situations where it may be uncomfortable, or when an employee wishes to consult with someone other than their direct manager, the employee is able to submit an inquiry from any computer/inbox directly to the Company's internal auditor by email. Furthermore, the internal auditor can be also contacted in writing or telephone, according to the contact information detailed in this document. When an inquiry is received, the Company's internal auditor will clarify the notice with the individual who submitted it. Such inquiry will be addressed in a personal meeting, on the telephone, or with a committee.

Inquiries on certain matters can also be made by contacting other entities in the Company.

The internal auditor is responsible for informing all the Company's employees of the available means for contact.

# Examples of subjects for consultation and reporting under this policy

- Concern of violation of human rights
- Concern of conflict of interests
- Concern of bribery and corruption
- Concern of embezzlement, fraud, and money laundering
- Concern of financial deviations, abuse of power or position
- Concern of failure to comply with legal requirements and/or their breach.
- Concern of failure to comply with policy and procedures set by the Company

Complaints relating to sexual harassment are addressed separately by the sexual harassment officer.

# Whistleblower protection for the person requesting consultation and/or submitting a report

When the person submitting an inquiry requests protection, or in cases where the Company has a mechanism for management of inquiries that is the responsibility of another manager, the internal auditor may, at his or her discretion, consult and share the issue of the inquiry with this manager.

The protection of the person submitting the inquiry will be addressed by the Company's VP Human Resources and internal auditor who will provide appropriate protection given the circumstances. As part of the decision for protection, a suitable mechanism will be set up, based on the circumstances, to ensure implementation.

Bezeq prohibits and will prevent any kind of harm to an employee who reports unethical conduct or concerns regarding prohibited actions in good faith, as set out above (and who is not personally involved in such incident).

#### **Control**

The Company has an internal auditor, as required by law, who reports to the Chairman of the Board of Directors, and who is entrusted with reporting to the Audit Committee of the Board of Directors, among other things, on various matters as set out in this policy. Changes and revisions to the Inquiry Procedure on which, among others, this policy paper is based, are implemented with the approval of the audit committee of the board of directors.

### **Address for inquiries and reports**

Inquiries submitted pursuant to this policy can be made in writing or orally, openly or anonymously.

Address for inquiries: Internal auditor, 03-626-2511, <a href="mailto:diversity@bezeq.co.il">diversity@bezeq.co.il</a>

or by Israel Post addressed to:

Internal auditor

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