



GCA

# Public Affairs Policy

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## 1. SUMMARY

The purpose of this policy is to define the responsibilities, principles and governance rules that apply to the relations of all employees of the PROXIMUS Group with public authorities. It also establishes the values and ethical standards to be respected in contacts with public authorities. It is intended to assist and guide Proximus Group employees who interact with public authorities and politicians in the performance of their duties.

## 2. Introduction - GROUP PUBLIC AFFAIRS (GPA)

The Group Public Affairs (GPA) organisation brings together all the advisors in contact with the public authorities of Proximus NV and its subsidiaries operating directly in Belgium. GPA keeps an overview of all these contacts and manages the issues/public affairs files for the Proximus Group. GPA is thus involved in non-commercial cases.

It is important, if contacts are made by any department with political figures, to notify GPA and obtain their approval in order to always maintain consistency in the messages given to the political world.

For issues relating to the Belgian subsidiaries, GPA is represented by one of the members of the Public Affairs team. If it proves to be effective for the Proximus Group to apply a two-tier approach between Proximus NV and its subsidiaries in a specific public affairs case, the Public Affairs strategy will be defined - on a case-by-case basis - in compliance with all governance rules.

### 2.1 Mission

Group Public Affairs (GPA) is a head office activity that represents and defends the interests and concerns of the Proximus Group to the Belgian public authorities in their policy-making process and in all types of public affairs matters. This organisation acts as an intermediary between the Proximus Group and the Belgian public authorities and vice versa.

Its mission is as follows:

1. Advising, mentoring and supporting Proximus NV and its subsidiaries creatively and proactively in the field of public affairs, in order to optimize the operating climate in which they operate.
2. Represent and defend the interests of the company with the Belgian public authorities in their political, legislative, policy-making role and with specific interest organisations and coordination bodies (AKT, Agoria, Voka, etc.).
3. To capture political concerns or problems and bring them to the attention of the company.
4. Achieve individual and team performance in the best interest of the company, leveraging a strong network of contacts and demonstrating integrity and professionalism.

### 2.2 Key Responsibilities

To this end, GPA has the following key responsibilities:

1. Consolidate and represent the company's position in public affairs. In particular, by organizing and coordinating a consultation and internal alignment process with the divisions or subsidiaries concerned.
2. To improve operational conditions as much as possible, to the extent that these conditions are influenced by public authorities.

3. Define, prepare and execute targeted and effective lobbying actions.
4. Detect any potential opportunities for the company that are linked to the plans developed by the political authorities.
5. Monitor and follow up on developments in public affairs that may impact the interests of the company.

## 3 Contacts with the political world

### 3.1 Values and ethical standards

PXS Group is committed to the highest ethical and professional standards in all its interactions with public and political authorities. This commitment is essential to developing and maintaining long-lasting relationships based on trust, integrity and mutual respect. PXS Group employees must embody the following values when dealing with public bodies:

- **Impartiality and integrity** : In any interaction with public authorities or their representatives, PXS Group employees must demonstrate complete impartiality, ensuring that their actions and decisions are guided by integrity and compliance with ethical standards, without any bias or external influence. They must balance their relationships in a fair and transparent manner, always with the aim of protecting and promoting the legitimate interests of the company.
- **Competence and expertise** : Employees must possess a thorough understanding of legislative and government processes, as well as the specialized knowledge necessary to represent the PXS Group with professionalism. They must continuously train and keep abreast of regulatory and legislative developments in order to ensure competent representation that complies with legal requirements.
- **Transparency and honesty** : In all communications with public authorities, employees are required to be honest and transparent. They must provide accurate, complete and up-to-date information. In the event of incorrect information being transmitted, it is their responsibility to make the necessary corrections proactively and without delay, in order to maintain the trust and credibility of the PXS Group.
- **Respect for the law** : It is essential that employees refrain from any action that could incite a representative of public authorities, a political representative or a civil servant to violate the law or regulations in force. They must ensure that all their activities comply with Belgian and international laws, the company's internal regulations and professional ethics standards.
- **Absence of corrupt practices and political neutrality**: The PXS Group adopts a posture of rigorous political neutrality. Employees must refrain from offering financial incentives or any other type of benefit to a public authority in order to avoid any conflict of interest or perception of bias. Partnerships and contributions must be made exclusively within the framework of formal agreements approved by the company's governing bodies, such as the PXS Sponsorship Committee, or within the framework of defined memberships, in order to prevent any risk of corruption or the appearance of favoritism.
- **Respect**: Employees are expected to act with the utmost integrity and respect for public authorities. Every interaction should be marked by courtesy, mutual respect, and active listening, in order to foster constructive and positive relationships. Employees must value the diversity of points of view and treat each representative, whether political or civil servant, with the dignity and respect they deserve.
- **Commitment to social and ethical responsibility** : Beyond compliance with laws and regulations, the PXS Group encourages its employees to actively promote social and ethical responsibility. This includes participating in

constructive dialogues with public authorities on issues of common interest, and a commitment to contribute positively to society as a corporate citizen.

By integrating these principles into their daily actions, PXS Group employees strengthen the company's reputation as a responsible and trustworthy partner of public and political authorities

## 3.2 Governance

The table below shows a view of the services that have the lead at PXS in the relations with the public authorities mentioned.

Relation	Responsible within the public authority	Responsible within the Proximus Group
As a shareholder	Federal authorities	Secretary-general
As a legislative or policy/rule-making body	<ul style="list-style-type: none"> <li>• Governments, Parliaments,</li> <li>• Advisors and relevant staff (cabinets and administrations) at: <ul style="list-style-type: none"> <li>○ European level</li> <li>○ Federal level</li> <li>○ Regional and Community level</li> <li>○ Provincial level</li> <li>○ Local level</li> </ul> </li> <li>• European Commissioners</li> <li>• Federal and regional ministers</li> <li>• Chairs/Officials/Members</li> <li>• political parties</li> </ul>	Group Public Affairs (GPA)
As a lobbying group or interest group	<ul style="list-style-type: none"> <li>• Public servants/party members</li> <li>• Policies</li> <li>• Cabinet Representatives and Ministers</li> <li>• Special Interest Organizations or Umbrella Organizations</li> </ul>	Group Public Affairs (GPA)
As a regulator of the telecoms sector	<ul style="list-style-type: none"> <li>• Federal Administration : BIPT</li> <li>• Corresponding institutions at Community or European level</li> </ul>	Group Regulatory Affairs

As a compliance body enforcing laws/rules (e.g. as a public domain manager)	Federal, regional, community, provincial and local governments	Technical departments, business units and divisions concerned, in consultation with Group Public Affairs (GPA).
As a judicial body	Courts, Judicial and Related Authorities	Group Legal Affairs
As an intervention in the emergency plan	Coordination with public entities in the context of the activation of the emergency plan/PERT	Technical departments in consultation with Group Public Affairs
As a customer using the Group's products and services Proximus	Any public authority	Business Units concernées
In an emergency or as a law enforcement or inspection agency	Services de secours, armée, police, sécurité de l'État, inspection technique et médicale, agences étrangères, police environnementale.	<input type="checkbox"/> Corporate Prevention & Protection <input type="checkbox"/> Investigation <input type="checkbox"/> Business continuity planning in the event of disasters.

### 3.3 Contacts with public authorities

As a general rule, all contacts with public authorities must be handled by the person in charge who corresponds to the type of relationship between the public authority and the Proximus Group.

Special case - meetings with

1. Ministers at the federal/regional/community level
2. Presidents of political parties
3. Commissioners at EU level

Meetings with ministers, presidents or commissioners are carefully monitored, in close cooperation with members of Group Public Affairs (GPA) and/or a member of the Proximus Leadership Squad or a person designated by the above-mentioned persons. If GPA does not attend these meetings, it will always be informed of this and of the content discussed, unless otherwise decided by the CEO.

Group Public Affairs (GPA) manages and coordinates all the Proximus Group's contacts with public authorities with a legislative, law-making or policy-making or lobbying role.

As a point of contact, GPA can play a role of facilitator or mediator in other contacts with public authorities for which it is not the owner of the relationship, such as commercial or operational contacts.

### 3.4 Position paper

Group Public Affairs (GPA) manages all positions taken by the Proximus Group regarding public affairs vis-à-vis public authorities, according to the following rules:

1. A position initiative can be launched at the request of GPA or a division/subsidiary of the Proximus Group. As a rule, the relevant stakeholders within the Proximus Group are involved in determining its content. From the outset, GPA defines the most effective lobbying/communication strategy with public authorities, identifies the most appropriate interlocutor(s) within the authorities concerned, and proposes a timetable and a methodology. The positions defended with the public authorities are preferably formalised in an official statement.
2. Important and/or sensitive public affairs cases are subject to the approval of internal decision-making bodies. It is the responsibility of GPA to present these files to these bodies either directly or via its hierarchy.
3. If necessary to finalize any position paper, GPA will rely on the expertise required from other departments such as Business Units in the event of a commercial position, Group Regulatory for regulatory aspects, Group Legal Services for legal aspects and Group Communication to verify consistency with other communications.
4. If necessary, the position papers will be submitted to Group Strategy to check the alignment with the Proximus Group's strategy, and/or with the department's strategies within the Business Units.

### 3.5 Communication

The Group's external relations and media policy, which defines the responsibilities, principles and rules for communication with external parties, must be complied with at all times. In the case of public authorities, the additional rules prescribed in this document must be applied.

The format of communication (on paper - mail, fax or document -, electronically - file or email - or orally - interview, presentation or telephone conversation) is free and must be chosen by the parties concerned. A copy of all written and/or electronic formats is kept by the entity that processed the communication.

### 3.6 Transparency

GPA must be kept informed of all files/issues likely to have a political impact on our image, our political relations or likely to have an impact on existing public affairs files/issues.

### 3.7 Affiliations

All employees of the Proximus Group who, in the course of their professional activity, are members of an organisation dealing with public affairs, i.e. legislative, rule-making or policy making or lobbying, must report this affiliation to GPA. GPA maintains and coordinates all these affiliations at the level of the Proximus Group.

### 3.8 Contentious

GPA will be informed of any intention to initiate litigation against a public authority concerning an ongoing case, a legislative act or a decree.

### 3.9 Confidentiality

The Group's policy must be respected at all times. In all cases, the head of each division/subsidiary is responsible for approving the dissemination of its information.

In cases where the information is confidential, this indication must be clearly indicated.

More specifically, during contacts with public authorities or their representatives in the exercise of their professional activity, each employee of the Proximus Group:

1. observes total discretion: he cannot disclose confidential information to a public authority without the prior consent of GPA;
2. does not disclose any confidential information obtained from a public authority to persons who are not concerned with the public affairs file;
3. gives full transparency on the source of any information obtained: employees are not allowed to protect their relationships by not identifying the source with surrogacy.

## 4. Consequences of non-compliance

Any violation of this policy could result in disciplinary action up to and including dismissal, in accordance with the employment regulations applicable to the employee concerned.

## 5. Compliance control process

- Group Public Affairs will check compliance with this policy on a case-by-case basis.