



Our commitment to Ethics

We have a passion for growth.



Our commitment to Ethics

The TELUS Code of Ethics and Conduct has been approved by the Board of Directors to assist TELUS team members in maintaining the highest standards of ethical conduct in the corporate and professional dealings they have with all our stakeholders (customers, shareholders, suppliers, colleagues and our communities). The TELUS Code of Ethics and Conduct outlines the responsibilities and guidelines that describe the ethical standard expected of all team members. This standard requires that each member of our team understand and apply the guidelines in this Code to everyday actions and decisions.

In addition, it provides a decision making process supporting the resolution of ethical issues and identifies members of the TELUS team who are available for help and advice. Case studies are provided to illustrate how ethical responsibilities and guidelines apply in everyday situations.

At TELUS, we not only do things right, but we should strive to do the right things. Each member of our team takes responsibility for their actions including:

- Observance of the guidelines outlined in this and other company policies wherever in the world we are working
- Compliance with applicable local laws and regulations

TELUS Integrity training is annual web-enabled training for all team members to review the current TELUS Code of Ethics and Conduct and affirm that they understand their responsibilities under it. Please read the TELUS Code of Ethics and Conduct carefully and make the ethical guidelines it outlines an integral part of how you conduct business at TELUS. You play an important role in representing our organization. Guided by these ethical standards, we build trusted relationships with our customers, shareholders, suppliers, fellow team members and the communities in which we live, work and serve.

The code is available on the Company's intranet and is publicly available at about.telus.com/governance/ethics.html



Working professionally

Competing fairly

We draw the attention of new team members to the Competing Fairly section of the TELUS Code of Ethics and Conduct. We do not improperly seek corporate trade secrets or confidential information belonging to others. Team members who worked for a competitor, supplier or customer will not be requested to provide confidential information about that party. If we receive unsolicited 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 who will consult with Legal Services. This does not preclude gathering information with the owner's consent or from the public domain.

Dealing with governments

TELUS values its relationships with governments at all levels: national, provincial and municipal. Team members dealing with governments and their employees 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. There are national and international laws regarding bribery and corruption that apply to TELUS and impose civil and criminal penalties. We do not support any form of dishonesty, including bribes, kickbacks and extortion, either directly or indirectly through an agent or third party. Team members doing business with foreign public officials should obtain approval from the President of TELUS International with concurrence from Legal Services before making payments or gifts to government officials outside of Canada.



Personal use of communication devices

In our future friendly world, communication devices (whether the company's or our own) are used for both business and personal purposes. While we permit team members to use TELUS-provided communications 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 before or after the normal working day, or during reasonable permitted breaks from business work subject to local leadership approval and the needs of the business.

In our personal electronic communications using either TELUS-provided devices or personal devices where we are identified as a TELUS team member, we should:

- Remember that these communications provide a permanent record and we may be operating in a public space.
- Use common sense when offering our personal opinions to avoid subjecting either TELUS or ourselves to legal action. To help avoid confusion, add the following notice: "the views expressed on this website/weblog/email are mine alone and do not necessarily reflect the views of my employer".
- Not disclose information that is confidential to TELUS or to any third party that has disclosed information to us.
- Show respect towards other persons and organizations and avoid defamatory or discriminatory messages.
- Avoid offensive content of any kind, including pornography and materials promoting violence, discrimination or hatred.
- Not display the TELUS logo or brand images in personal communications without written permission from a senior leader or the Brand Office.
- Not disclose personal information about ourselves that we do not want the public to be aware of, nor disclose personal information about others.



Business records

Accurate, reliable records are essential for effective company management to enable us to meet our business, legal and financial obligations. We strive to ensure all reports (whether for external or internal use), records and other data are factual, fair, complete, timely and understandable. Confidential information should be properly identified and respected as such. To protect the accuracy of our records, only legal and approved software is to be used on TELUS equipment.

Respecting others

Human rights

We are committed to treating all current, potential and past team members, as well as all partners, suppliers, shareholders, and customers (and others stakeholders) with dignity, respect and fairness and in a non-discriminatory and harassment free manner.

Every team member has the right to a workplace that is free of unacceptable behaviours and has the obligation to treat others in the same manner.

Unacceptable behaviours include discrimination based on a prohibited ground (race, national or ethnic origin, colour, religion, age, sex, gender identity or expression, sexual orientation, marital status, family status, genetic characteristics, disability or conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered) bullying, harassment and violence.

Workplace sexual harassment is a form of discrimination and a violation of the Respectful Workplace policy. Sexual harassment includes any conduct, comment, gesture, or contact of a sexual nature that is likely to cause offence or humiliation or that might reasonably be perceived as placing a condition of a sexual nature on any employment opportunity.

Valuing Diversity and Inclusion

We believe the diversity of our team is a significant competitive advantage and we believe diversity thrives when we respect the traditions, beliefs, lifestyles, abilities and perspectives of all members of our team.

Our commitment to inclusiveness includes the provision of workplace accommodation related to protected human rights grounds in accordance with the law to permit qualified persons to do their jobs.



Social media

Social media includes any digital communication channels that allow individuals to create and share content and post comments. Team members must comply with our Social Media Guidelines, use good judgement and be polite, respectful, and mindful of the content created, shared and posted, remembering that the Internet is a public place.

We encourage communication among our team members, customers, and partners, through social networks, blogs, forums, video, and other social-driven platforms. However, as a TELUS team member, you should consider the following:

- Remember that you can often leave a permanent footprint of your online presence and you may be operating in a public space where anyone can view your content
- Do not review TELUS products or services on social media, whether you've identified yourself as a team member or not. This includes posting reviews in an app store, or on social networks. Doing so can result in legal ramifications for the business
- Use common sense when offering personal opinions to avoid subjecting either TELUS or yourself to legal action. To help avoid confusion, and depending on the circumstances, it may be appropriate to add the following statement to your social media bio: "the views expressed on this website/blog/email are mine alone and do not necessarily reflect the views of my employer"
- Do not disclose information that is confidential to TELUS or provided in confidence to TELUS, including upcoming promotions or device launches or financial information until the information has been made public
- Although sharing information about services or offers is acceptable, 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
- Show respect towards other persons and organizations and avoid defamatory, discriminatory, harassing or sexual messages
- Avoid offensive content of any kind, including pornography and materials promoting violence, discrimination or hatred
- Do not display the TELUS logo or brand images in personal communications without written permission from a senior leader or the Brand Office.

If you are interested in sharing content or promoting TELUS initiatives, we recommend downloading the Amplify app on your phone, which can be found in the app store, and setting up an account using your TELUS email address. This app features curated feeds of approved TELUS content that can be shared directly with your social networks.



Managing our relationships

Conflict of interest

WHAT it means

As team members, our first business loyalty must be to TELUS. We must avoid situations or relationships that conflict with the interests of the Company 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 for personal gain or benefit. As team members, we must disclose actual or potential conflicts of interest to our leader. Each situation must be considered individually based 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 the Company intranet and submit it to the Ethics Office. Remember, having a conflict of interest is not necessarily a Code violation, but failing to disclose it is.

Ethical Sales Practices

Team members share a commitment to delivering on our Customers First priorities, which include 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.

Speaking up

Reporting

Team members are required to report unethical practices or violations of any TELUS policy and are encouraged to ask questions if unsure as to the ethical course of action to take. Members of the TELUS team are expected to act honestly in all dealings, comply with all laws and regulations governing our business, and maintain an ethical work environment. It is the responsibility of TELUS team members to report, in good faith, any activity which may be a violation of any applicable law, regulation, or TELUS policy.

What should I report?

We invite team members to request guidance or make a good faith report about activities that may involve unethical, illegal or otherwise inappropriate behavior.

Perceived or actual examples include:

- Accounting and auditing matters
- Conflicts of interest
- Violations of the law
- Violations of TELUS Policy
- Pressure to meet targets in a manner not consistent with TELUS values
- Risk to or misuse of TELUS-owned assets, property or resources
- Data privacy breaches or incidents
- Security breaches or incidents
- Falsification of contracts, reports, or records
- Fraud/theft/embezzlement
- Discrimination or harassment
- Improper giving or receiving of gifts
- Improper supplier or contractor activity
- Purchasing/procurement misconduct

Contact the EthicsLine at 1-888-265-4112 or submit a report at www.telus.ethicspoint.com
International dialing directions are available on this site.