

# Business principles

The O2 guide for how we work  
and conduct our business

O<sub>2</sub>

# Our vision

To be the essential mobile brand by enriching people's lives, whatever they're doing, wherever they are.

# Our mission

To build an inseparable relationship with our customers by understanding their needs and delivering wireless solutions that they truly value.

Dear Colleague,

A company's reputation can be key to its success and this is true of many businesses that over the years have continued to thrive on their reputation of being impartial, fair, good value for money and above all customer focussed. That's why I firmly believe that the enhancement of O2's good name is one of the most important parts of our job.

Most large companies have expressed guiding principles for their business. Ours clearly describe our commitment to the highest ethical standards, both in our behaviour as individuals and in our business activities, which is why we also expect our contractors and encourage our suppliers to be guided by these standards.

It is important for all of us, myself and the top team included, that we comply with our business principles; it is this set of policies, regulations and laws that govern our company. By complying with them in all that we do, we are all actively working towards the ultimate goal of protecting and enhancing our reputation.

I hope when confronted with difficult decisions they will help you to gauge the right course of action. Doing the right thing is not always convenient, but it is essential to the financial stability of our business, and critical to our overall success.

Please take the time to complete the Business Principles training course so that you fully understand the way that we are committed to doing business and then you will be equipped to create value for our business by sustaining our reputation.

Sincerely,



David Arculus  
Chairman

January 2005

# Our values

## Bold

We are fresh, surprising and distinctive.

We are confident, but not arrogant, continually coming up with new and exciting ideas that are practical and relevant to our customers.

We are an energetic brand, full of life.

## Open

We are candid in our communications; we tell it like it is.

We are never secretive, we communicate openly and explore new opportunities for our customers.

## Trusted

We understand our customers.

We are accurate and truthful and we never over-claim.

We have an inseparable relationship with our customers and are always helpful, supportive and responsive.

We are never strident, but instead we listen to our customers.

## Clear

We make highly complex technology simpler to understand and easy to use.

We are clear and straightforward in our communications.

We avoid industry jargon.

# Ethical conduct

We are committed to the highest ethical standards. People will know that they can trust us.

Trust can only be built on honesty and dependability - on ethical conduct.

## Our customers can trust us

Our first responsibility is to our customers, who trust us to deliver an excellent service at a fair price.

## We can trust each other

A company's reputation is built on us, its people and in an instant that reputation can be diminished. However, through the trust we have in each other and the respect for each other's contribution, we can reinforce and improve our reputation every day.

## Our communities can trust us

We take pride in the services that we provide to communities. We also seek to work in partnership with civic, community and charitable groups where we operate. Through our commitment, these communities will know that they can trust us.

# Our business principles

These principles apply to all employees. We aim to encourage others who work with us to embrace these principles.

In complying with these principles we will maximise long term value for our shareholders and society at large.

We will always follow these principles.

## Ethical conduct

- We will comply with all laws, rules and regulatory obligations.
- We compete fairly in our markets, being honest and trustworthy in all our dealings and keep the commitments we make.
- We will not offer or accept gifts, hospitality, bribes or other inducements, which encourage or reward a decision. We will report and record any gifts.
- We will avoid or declare conflicts of interest that may lead (or be seen to lead) to divided personal loyalties.
- We will not seek gain for others or ourselves through misuse of our position within O2.
- We respect the principles of the UN Universal Declaration of Human Rights and the International Labour Organisation declarations.

## Customers

- We will understand the needs of our customers.
- We will deliver good value for money.
- We will be truthful, helpful and accurate in our communications.
- We will ensure that our products comply with safety and manufacturing standards.

## Employees

- We treat everyone fairly, and impartially, without prejudice regardless of race, colour, nationality, ethnic or national origins, religion or religious affiliation, gender, gender status, sexual orientation, marital status, age, disability or caring responsibilities.
- We will not tolerate harassment in any form.
- We will not use any form of forced or child labour.
- We will engender a zero tolerance culture to injury and ill health arising from, or associated with, the work activity.

## Internal control and risks

- We will regularly assess the risks to our business and our people and ensure that appropriate controls are in place to manage them.
- We will ensure that business records are prepared accurately and reliably and that expenditure is suitably authorised and approved.
- We will always strive for excellence.

## Information

- We protect the confidentiality of company, employee and customer information.
- We ensure privacy of communications – it is basic to our business, from a legal stance and because the public trusts our integrity.

## Assets

- We will protect our physical, financial and intellectual assets.
- We will ensure company assets are not used for personal benefit and will not allow them to be sold, loaned, or given away without proper authorisation.

## Health and safety

- We will care for the health and safety of each other, our customers and the communities in which we operate.
- We will disclose any information about our products and services that demonstrates they breach the required safety standards.

## Environment

We will support and follow operational policies that minimise our impact on the environment.

## Communities and society

We will seek to contribute to the development of the communities where we operate.

## Political contributions

We do not make donations, whether in cash or in kind, in support of political parties. However, due to the broad nature of the legislation, some activities may be deemed to be donations and in this instance we will act in the best interests of the company and its shareholders.

## Business partners and suppliers

- We will award business solely on merit, without favouritism, by securing products and services available at the best available terms.
- We expect our business partners and suppliers to meet the same standards of business conduct as ourselves.

## Shareholders

- We will manage the O2 group in accordance with the highest standards of corporate governance and best practice.
- We will provide opportunities for shareholders to assess our objectives, strategy and performance.

# Advice and confidential help

## Resolving conflicts

Deciding how to act in the face of conflicting demands can be difficult. The following questions may help you reach the right decision.

- Is this action **legal**?
- Are you **authorised**?
- Have you taken account of any company **policies**?
- How would this look in tomorrow morning's **newspaper**?
- How would you explain your decision to your **family**?
- Does it conflict with your own or O2's commitments to **integrity**?

Every employee has a responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding compliance with these principles and related policies.

## Reporting

Those wishing to seek advice or report an incident can be reassured that they will be treated with dignity and respect and will:

- be taken seriously;
- not suffer retribution;
- be treated with the utmost confidentiality.

People with authority within the company themselves risk disciplinary action including dismissal if they try to stop you and/or impose penalties of any form on you for contacting the Corporate Governance Officer to report any behaviour which might be concerning you.

## Contact us

Corporate Governance Officer  
O2 plc

Legal and Corporate Affairs  
Wellington Street, Slough  
Berkshire, SL1 1YP

Email: [businessprinciples@o2.com](mailto:businessprinciples@o2.com)

# Compliance responsibilities

For O2 employees, failure to conduct business in line with our business principles may ultimately result in disciplinary action up to and including dismissal.

Managers are responsible for communicating the information in this booklet to their staff, implementing this policy and providing assurance on compliance for their area of responsibility.

The Business Principles web site details the steps that a manager should follow to ensure the programme is in place, working effectively and reported where required.

Online Business Principles

[http://www.o2.com/business\\_principles](http://www.o2.com/business_principles)



