TELUS
let's make the future friendly™

TELUS Code of Ethics and Conduct

March 2022

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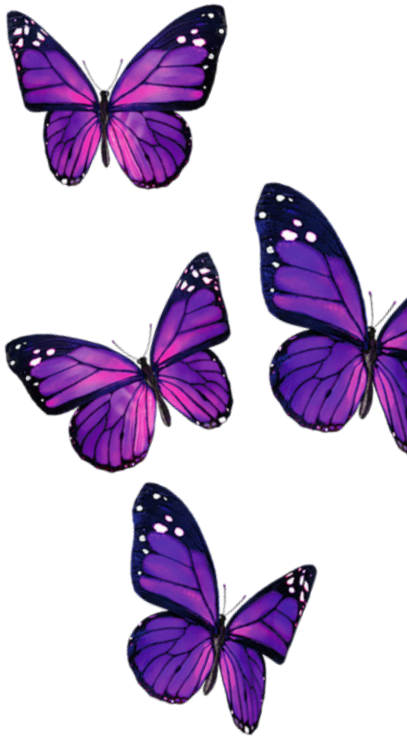
All TELUS team members

At TELUS, our award-winning culture is underpinned by our commitment to interacting with our many stakeholders in a manner that is ethical, transparent and authentic. This includes promoting inclusion, compassion and understanding through our collective actions, and creating a work environment that is truly welcoming and valued by all. These expectations extend beyond each of us to include our suppliers, vendors, community partners, board of directors and any other group that acts on our behalf or represents TELUS to our customers or communities.

This commitment to ethical behaviour, diversity and authenticity is supported by our Code of Ethics & Conduct. Our Code provides clarity on numerous topics and situations any one of us might face, including ways to avoid conflicts of interest; the rules around accepting gifts and benefits; the many ways in which we are all responsible for protecting our brand, reputation, assets, information and intellectual property; and our roles and responsibilities when it comes to safeguarding our customers' data, security and privacy. Importantly, our Code ensures that no matter where we are serving our customers — from a retail location, a corporate building, a customer's home or our own home office — every interaction is guided by a clearly defined set of ethical expectations that support us in delivering consistently outstanding client experiences. In this regard, we ask that you review our Code of Ethics & Conduct and align your behaviour and decisions with the policies, procedures and standards.



Thank you for following our Code of Ethics & Conduct and continuing to act with personal and professional integrity. Our collective efforts to embrace ethical, transparent and respectful behaviour will help to ensure that we continue to deliver on our Customers First promise, whilst further elevating our world-leading culture and our global leadership in social capitalism.

Thank you for leveraging our Code of Ethics and Conduct to further elevate your actions, thus ensuring we can continue to create positive outcomes for our team members, our customers, our shareholders and our communities.

With appreciation,

Sandy McIntosh
Executive Vice-President, People & Culture *and* Chief Human Resources Officer

Doug French
Executive Vice-President *and* Chief Financial Officer

Tony Geheran
Executive Vice-President *and* Chief Customer Officer

Darren Entwistle
President *and* Chief Executive Officer

Living our Values

The TELUS team works together to deliver future friendly services, and our values guide the way:

We passionately put our customers and communities first.

We embrace change and innovate courageously.

We grow together through spirited teamwork.

Why do we have a Code?

TELUS' Code of Ethics & Conduct (the "Code") outlines the behaviours that we must exhibit in order to meet and uphold TELUS' ethical and conduct standards. The Code is intended to set the tone for how we work at TELUS help us recognize ethical and compliance issues before they arise and guide our response should they arise.

The Code applies to the directors, officers and employees (referred to as "team members" or "TELUS team members") of the TELUS group of companies (i.e. TELUS Corporation and all of its owned companies, subsidiaries and affiliates) that are directly or indirectly controlled or managed by TELUS. TELUS International has a Code of Ethics & Conduct that applies to its team members.

In this Code, we refer to all of these entities collectively as "TELUS". Team members, including team members new to TELUS through mergers or acquisitions, are required to review this Code at least annually to remain familiar with its terms and to adhere to them. Suppliers and contractors are subject to the Supplier Code of Conduct.

To assist team members in remaining familiar with the Code, they are to read and understand the Code, and complete the required Integrity training course each year. Team members must also complete any other required compliance courses in a timely manner.

The Code cannot address every possible ethical scenario we might face, so it is up to team members to use good judgment and seek guidance when they have questions, are not sure about the right course of action, or see something that does not appear to be right. The Code is reviewed every two years and revised as necessary and we created this Code, together with our Values, to serve as your guide to acting with integrity.

Compliance with the Code is a condition of employment for all TELUS team members and any violation of this Code or any applicable law will be subject to disciplinary action, up to and including dismissal.

TELUS reserves the right to revoke or amend any term of the Code if required by the needs of the business. TELUS will notify team members of any amendments to the Code prior to the changes becoming effective.

The Code is available on the TELUS intranet (Habitat) under Go/Ethics, and is publicly available at about.telus.com/governance/ethics.html.

Responsibilities

All TELUS team members

Ethical behaviour is an individual responsibility and we are all required to act in a manner consistent with high ethical standards. All team members, including team members new to TELUS through mergers or acquisitions, regardless of work location, are expected to act honestly in all their dealings, comply with the laws governing our businesses, and maintain an ethical work environment. All team members have an obligation to promptly raise issues or concerns about any suspected or known misconduct with their leader or the Ethics Office. These standards require that all team members understand and apply the guidelines in this Code to everyday actions and decisions. Failing to read or attest to the standards does not excuse us from these responsibilities.

At TELUS, we not only do things right, but we strive to *do the right things*.

All business activities should be able to stand up to any possible public scrutiny and further investigation if required.

The guidelines in this Code are based upon generally accepted standards of ethical business conduct and applicable laws. The absence of a guideline covering a particular situation does not relieve any of us from the responsibility for acting ethically and within the law.

> All team members have an obligation to promptly raise issues or concerns about any suspected or known misconduct with their leader or the Ethics Office.

Roles and responsibilities of TELUS Leaders

As a leader, you must ensure that activities within your area of responsibility are carried out in accordance with the Code and all applicable Corporate Policies. Our leaders are expected to:

- Be familiar with the Code as well as procedures and resources available to handle ethical inquiries, complaints or violations
- Promote and drive a culture of integrity while maintaining a climate in which honest, ethical and legal business conduct is the norm
- Ensure that annual Integrity training, as well as any other mandatory training, is completed by all team members and that violations of the Code are addressed consistently, and team members are held accountable for their behaviour at work
- Identify risks of non-compliance with this Code within their area of responsibility and take appropriate steps to address such risks
- Create and maintain a work environment where team members feel comfortable speaking up and having open discussions without the fear of retaliation
- Communicate regularly with their team and emphasize the importance of compliance, and demonstrate visibly and actively – through words and behaviour – their personal commitment to the Code and its policies
- Use our performance development process to evaluate and recognize team members not only on the business objectives achieved, but also on how they are achieved

Team members with roles relating to internal controls over financial reporting and disclosure control

Team members who have roles related to internal controls over financial reporting and disclosure controls have, as outlined in the Policy on Corporate Disclosure and Confidentiality of Information, the responsibility to make full, fair, accurate, timely and understandable disclosure in reports and documents that TELUS files with, or submits to, securities commissions and in other public communications made by TELUS.

Members of the TELUS Board of Directors

TELUS Board members have the responsibility to notify the Board of any potential or perceived conflict of interest, change in circumstance or other Code issues which may affect their ability to contribute to the Board as outlined in the Board Policy Manual.

Team members who serve or represent TELUS as directors on the boards of other organizations

In addition to the above responsibilities, TELUS team members who serve or represent TELUS on the boards of other organizations have the responsibility to notify their leader, or contact the TELUS Ethics Office, to discuss any potential or perceived conflict of interest or other Code issues which may arise during the course of their service on the other organization's board. In providing such notice, team members should exercise due care to ensure that they act in compliance with their fiduciary and other obligations to the other organization and, for example, do not disclose that organization's confidential information to TELUS, without prior written approval of that organization.

Ethics Office

The Ethics Office provides team members with a resource regarding ethical and conduct matters. This office oversees the Code, conducts investigations, provides advice on ethical issues, conducts matters, as well as develops and administers training for TELUS' expected standards of business conduct. The office reports on its activities, including on breaches of the Code, to the President & Chief Executive Officer and financial officers (unless implicated), and to the Human Resources & Compensation Committee and the Audit Committee of the Board on a quarterly basis.

Integrity Work Group

An Integrity Work Group supports the Ethics Office in overseeing the Code, evaluating complaints or breaches and reporting quarterly to senior leadership and the Human Resources & Compensation Committee and the Audit Committee of the TELUS Board. Members of the Integrity Work Group include representatives from Risk Management, People & Culture, Legal Services, the Data & Trust Office, TELUS International and the TELUS Security Office.

If you are unsure as to the proper course of action to take in a particular situation, you should first discuss the situation with your leader or the applicable department identified in this Code. Team members should retain all documentation and save a written record of the guidance provided by their leader or members of other departments and any decision made in the event there is a future investigation with respect to a possible violation of the Code.

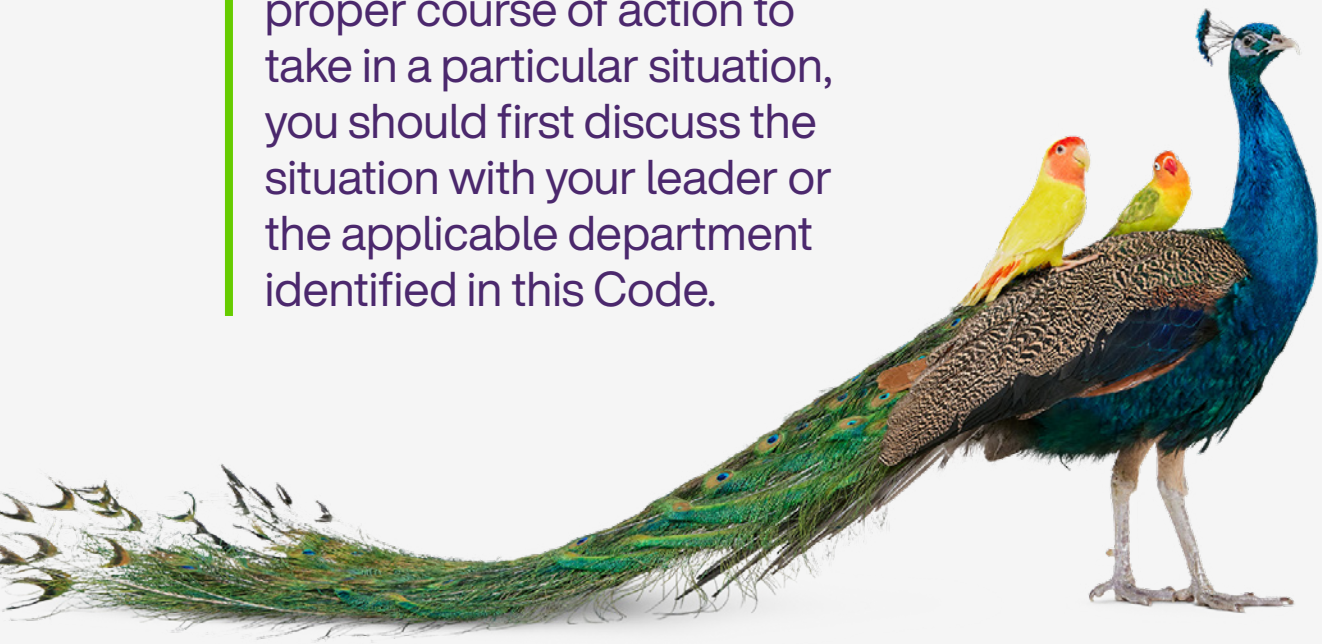
Failure to act in accordance with the guidelines outlined in this Code may have consequences for the individual team members, may create potential harm to TELUS' reputation and brand, and may put TELUS at risk for civil or criminal liability. Individual consequences may include disciplinary action, including dismissal for just cause, as well as civil and criminal penalties. Therefore, please regard the requirement to understand and to act in accordance with the Code as a very serious obligation.

Departures from Code/Waivers

It is not intended that there be any departure (i.e. waivers) from the provisions of this Code. In the unlikely event that a material departure or waiver is considered:

- For an executive leadership team ("ELT") member or a member of the Board, they must receive prior written approval by the Board or a Board member delegate and must be disclosed, subject to the Policy on Corporate Disclosure and Confidentiality of Information.
- For any other team members, prior written approval must be received by the Chief Legal and Governance Officer together with the Vice President of Risk Management & Chief Internal Auditor, and must be reported to the Audit Committee of the Board at its next meeting.

If you are unsure as to the proper course of action to take in a particular situation, you should first discuss the situation with your leader or the applicable department identified in this Code.

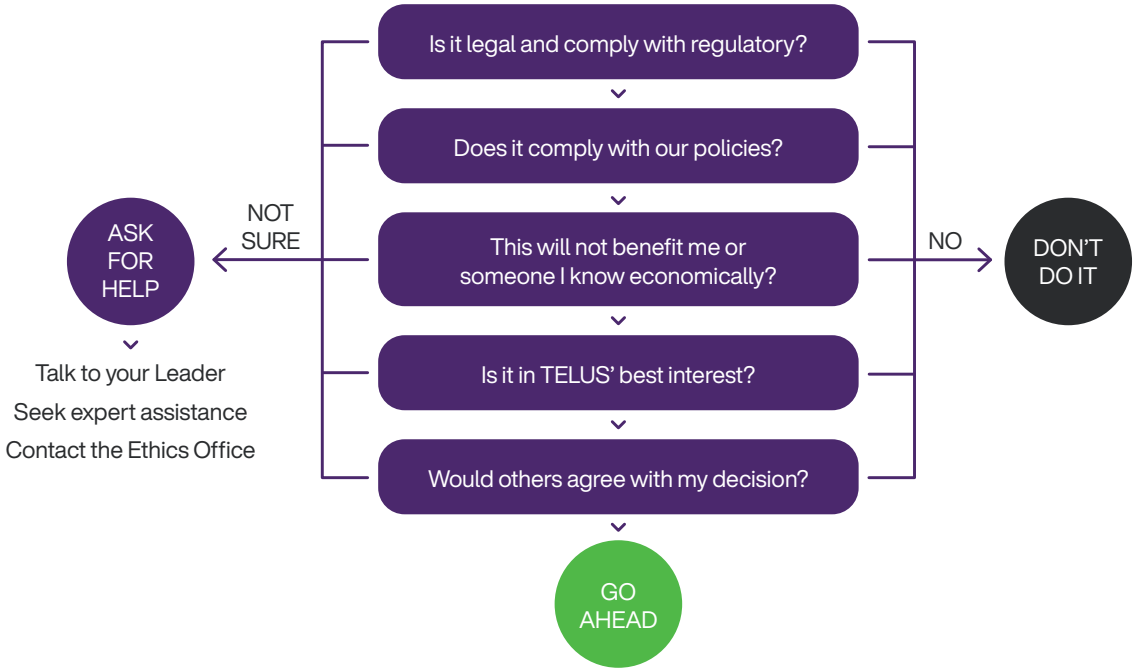


Ethical decision making and reporting issues and concerns

This Code reflects our commitment to high standards of integrity and ethical behaviour in our professional and business dealings.

Each of us is responsible for ensuring our behaviour is ethical and for taking steps to resolve ethical dilemmas. The guidelines in this Code are provided to assist with ethical decision-making.

If you have an ethical issue with which you require help, follow the process below, until your situation has been resolved.



1. Questions to ask yourself

Gather information and determine if the situation you face is an ethical issue. The questions below may help clarify your situation and ethical action:

- What is my immediate feeling about this?
- Does this comply with TELUS policies, procedures and values?
- Is this legal and does it comply with regulatory requirements?
- Is this an expectation of my job?
- How would others, including our customers, perceive this action?
- Would I or TELUS be embarrassed if this situation were discussed in the media?
- Would I be putting TELUS or myself at unnecessary risk?
- What impact would this have on my or TELUS' reputation?
- Is this directing revenue or customers away from TELUS or otherwise negatively affecting TELUS' interests?
- Does this affect my judgment or ability to act in the best interests of TELUS?
- Does this benefit me or a person somehow related to me economically?
- Does this impact TELUS economically or cost TELUS money?

We rely on all team members to use good judgment to guide behaviour and to ask questions in situations where the proper course of action may be unclear.

2. Talk to your leader

Often your leader is in the best position to help you work through the issue. Your leader is responsible for supporting open discussion, working through the ethical questions and other issues you have that touch on the Code, and guiding your access to further assistance as required. In situations where you are uncomfortable talking with your leader, or your leader is unable to help, you should refer to the next level of leadership or seek expert assistance as detailed in the next section.

3. Seek expert assistance

If you have tried the above steps but still have questions, assistance is available through designated subject matter experts in People & Culture, Legal Services, the Data & Trust Office, the TELUS Security Office, the Ethics Office, Regulatory Affairs and Corporate Accounting & Financial Reporting. Names and contact telephone numbers are listed on TELUS' internal website under Ethics.

4. Speaking up: 1-888-265-4112

Failure to follow the Code can put our shareholders, customers and other stakeholders, including our peers and our business, at risk. For these reasons, you are obligated to speak up promptly if you become aware of a potential or suspected violation of the Code.

You may contact the TELUS EthicsLine to request ethical guidance or make a good-faith report about harassment, misconduct or a perceived violation of our Code, another TELUS policy or procedure, a law, questionable business practices, potential fraud or concerns or complaints with respect to any accounting, accounting controls or auditing matter. **You may choose to remain anonymous, where allowed by law.**

A good-faith report alleging misconduct must be made promptly after the occurrence of a violation or perceived violation, or after a team member becomes aware of it. Failure to file a report promptly may negatively impact TELUS' ability to evaluate, investigate or resolve the alleged misconduct.

The EthicsLine is operated by an independent company and is staffed 24 hours a day, seven days a week, by live operators who are fluent in multiple languages. EthicsLine operators document and forward reports to the Ethics Office for review and handling following each call or web contact.

- Phone toll free: 1-888-265-4112 in North America.
- Web: www.telus.ethicspoint.com or TELUS' intranet

How the Ethics Office handles Inquiries:

The Ethics Office will assist team members in ethical decision-making by providing guidance concerning the Code. The Ethics Office may also refer to other subject matter experts within TELUS for assistance.

> We rely on all team members to use good judgment to guide behaviour and to ask questions in situations where the proper course of action may be unclear.

How the Ethics Office handles complaints:

Assessment of complaint

The Ethics Office will assess the nature of the complaint. The complaint will be reviewed under the direction of Legal Services in appropriate cases. The following matters for which other remedies exist **will not** be investigated by the Ethics Office and will be redirected as follows:

- **Labour relations issues** – Labour Relations and the immediate leader or other members of leadership
- **Employment issues** such as promotions, remuneration, reprimands, suspensions, dismissals – People and Culture and the immediate leader or other members of leadership
- **Respectful workplace issues** such as harassment and discrimination – Respectful Workplace Office
- **Customer-service complaints** – Customer Care or Client Care
- **Privacy-related issues** – the Data and Trust Office is engaged where a matter involves customer or team member privacy
- **Health and Safety issues** – the Safety and Environment team
- Others may be redirected on a one-off basis as determined by the Ethics Office.

Investigation

All complaints to the Ethics Office are taken seriously and investigated, in partnership with TELUS Security, the Data & Trust Office or other teams where appropriate, in a timely manner. If substantiated, the complaint will be resolved through appropriate corrective action and/or discipline. If you make a complaint and choose to identify yourself, you will be notified when the Ethics Office has completed its review. Every effort will be made to maintain the privacy and confidentiality for those who contact the Ethics Office or who are accused of a breach of this Code (although disclosure may be necessary in some cases to effectively conduct an investigation, take corrective action or support legal proceedings or otherwise as required by law). Deliberately or recklessly making false complaints will result in disciplinary action up to and including dismissal for just cause.

Non-retaliation/whistleblower protection

Retaliation or retribution against a team member for contacting the Ethics Office or for assisting or participating in an investigation of a complaint violates our ethical principles and will not be tolerated. If you feel you have been retaliated against, contact People & Culture or the Ethics Office immediately.

Opportunity to respond

If it is proven that a team member has breached or has likely breached this Code, the team member will be informed of the complaint in due course. He or she will be provided the opportunity to respond and, where appropriate, to contribute to the correction of the breach.

Reporting of breaches

Any breach of the Code will be reported to senior leadership with recommendations for action. Ethical issues reported to the Ethics Office will be summarized quarterly and reported to the Human Resources & Compensation Committee and the Audit Committee of the Board, together with the results of investigations, recommendations and action.

File documentation

Records of the report and investigation, including contents of meetings, interviews, results of investigations and other relevant material, will be maintained by the Ethics Office in a separate file, and managed in accordance with TELUS' Privacy Commitments and Record Retention Policy. Disclosure of information internally will be strictly limited to a need-to-know basis.

5. Last resort resolution

If an ethical issue remains unresolved, the Integrity Work Group is available to discuss and resolve any ethical issue brought forward. Every ethical issue referred to the Integrity Work Group will be reviewed and a decision will be made as to the merits of the issue or determination that no further action be taken.

If you have tried the above steps but still have questions, assistance is listed on TELUS' internal website under Ethics.

Guidelines

Privacy and Confidentiality of information

TELUS is dedicated to protecting the privacy of its customers and team members in all of our business operations. Every team member at TELUS has an obligation to put privacy first when handling personal information, and to comply with the privacy commitments we make to both our customers and team members. For more information about how we meet and exceed our privacy obligations, read the TELUS Privacy Code and TELUS Privacy Commitment.

TELUS also respects and protects the security and integrity of confidential information, whether the information belongs to TELUS, other team members, contractors, suppliers, community partners, customers or competitors.

Team members are permitted to access supplier, partner, customer or team member personal information only when they have a legitimate business need to do so and may only use that personal information for that specific business purpose. Team members are not permitted to record workplace conversations or take photographs or videos in the workplace with a recording device or camera (including, but not limited to, a smartphone) without either obtaining prior consent from all parties included in the recording, photograph or video or prior authorization from their leader or other TELUS leader. Team members should contact their leader or the Ethics Office for more information about recording workplace conversations.

In addition to the TELUS Privacy Code and TELUS Privacy Commitment, various business areas of TELUS may have additional supporting management practices in place. Refer to your leader for more information.

Personal Integrity

Individually and collectively, our personal integrity supports the honest use of TELUS resources such as time, funds, property and assets in dealings with co-workers and others, and in delivering on our Customers First priorities. Business needs must take priority in the allocation of our time at work. Company time and resources, irrespective of where we work (our declared “work style”) are to be used for business purposes unless otherwise authorized by the appropriate leadership.
While we respect the privacy and autonomy of our team members in their personal lives, their actions, both inside and outside the workplace, have the potential to negatively impact TELUS’ reputation.

Fraud

We have a zero-tolerance stance about instances of confirmed fraud. As team members we will not engage directly or indirectly in fraud, including account falsification, abusive sales practices, expense fraud, time fraud, or any other fraudulent practices or reporting. If you are approached by anyone who you feel is or may be suggesting engagement in fraudulent activities, or if you are aware of situations that may involve fraud, you must report the incident to your leader or contact the Ethics Office. Examples of fraudulent or otherwise improper activity include:

- Altering sales agreements or creating fictitious accounts to meet objectives or earn sales incentive payments
- Adding or modifying products or services on a customer's account without their knowledge, understanding or authorization
- Presenting false medical information for sick leave or disability benefits or participating in any activities, including travel, that are inconsistent with your medical restrictions and limitations
- Falsely reporting time worked to earn more pay or to avoid discipline for being late or absent from work
- Submitting fraudulent benefits claims to TELUS' service providers
- Failing to exercise due diligence to properly authenticate potential purchasers especially where there are high volume sales involved
- Working a second job while on sick leave without authorization from your leader.

Travel and expenses

TELUS funds may only be used for legitimate business purposes. We must follow TELUS policies regarding allowable expenses, expense limits, the use of corporate credit cards, preferred travel vendors, management approvals, receipts, expense reports and other travel-related matters and we are expected to truthfully, accurately and completely record our travel expenses. See the Travel & Expense Policy for more information about the rules and guidelines regarding reimbursable expenses.

Compliance with domestic and foreign laws

We comply with all applicable laws of the countries where we conduct business. Team members should understand and comply with the laws that relate to their work. It is the responsibility of leaders to ensure that members of their team are aware of their responsibilities in this regard and to seek advice from Legal Services, People & Culture, Regulatory Affairs or Taxation if they are unsure, especially for transactions that cross international borders or involve foreign laws.

Team members should be aware that many countries have laws that regulate the import and export of goods, services, software and technology for a variety of reasons, including national security and foreign policy.

Competing ethically/lawfully/fairly

We consciously and purposefully apply high standards of courtesy, professionalism, fairness and honesty when dealing with partners, suppliers, customers and competitors. We will report unethical practices by any other party to your leader or the TELUS EthicsLine.

Improper payments

We strictly prohibit any form of facilitation payments or other types of bribery, gifts and benefits that are illegal, improper or otherwise outside TELUS' acceptable guidelines, including kickbacks. Team members are prohibited from engaging, as well as offering or promising to engage, in these types of activities either directly or indirectly through an agent or third party. Local customs do not provide an exception to this requirement. Team members should be aware there are national and international laws regarding bribery and corruption that apply to TELUS and that may have significant potential civil and criminal penalties for violations.

Further guidance on identifying and avoiding facilitation payments, bribes and other forms of improper payment or benefit activities is provided in the Anti-Bribery and Corruption Policy.

Money laundering and terrorist financing

TELUS does not permit or enable money laundering, the funding of terrorism and/or other criminal activities. We conduct business only with partners, suppliers and customers involved in legitimate business activities with funds derived from legitimate sources. Money laundering is attempting to conceal the true origins of funds originating from criminal activity. Everyone at TELUS must obey laws prohibiting money laundering and report any suspicious activity or behaviour to the Ethics Office.

Other parties' confidential information

We do not improperly seek corporate trade secrets or confidential information belonging to others. If we receive unsolicited information that appears to be another party's corporate trade secrets or confidential 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 and/or Legal Services. Team members or contractors who have worked for a partner, supplier, customer or competitor will not be requested to provide confidential information about that party. This does not preclude gathering information with the owner's consent or from the public domain. Team members should refer to the TELUS Code of Conduct for Business Sales Activities for further details.

Fair competition

Compliance with competition laws and fair competition is part of our way of doing business and is important to our business strategy. We are committed to lawful competition, based upon the merits of our products and services and do not support any agreements or actions that restrict or impede fair competition in contravention of applicable laws. Competition (anti-trust) laws are complex and global in reach, and its application depends on the facts of a particular case. Team members with sales, marketing and pricing responsibilities, as well as senior leadership, function in areas that tend to involve risks for violating competition laws, particularly matters that include:

- Establishing terms and conditions as well as pricing and promotional strategies for TELUS products and services
- Developing advertising materials for TELUS products and services
- Negotiating, communicating or interacting with competitors
- Handling or using data about competitors
- Participating in trade associations that include competitors as participants
- Selecting or negotiating with vendors

Team members performing these functions should consult with Legal Services for appropriate advice and specific guidelines to address relevant competition law issues that are applicable to their situation. Team members are also required to report to Legal Services any contravention or suspected breach of competition law requirements. It is essential to involve legal counsel early in the process of developing new commercial initiatives given the many uncertainties that can arise in the application of this area of law. Team members should refer to the Competition Law Guidelines for further details.

Dealing with governments

When interacting with government officials, we follow high ethical standards and act in a transparent manner. Team members dealing with governments and government officials 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. Team members should refer to the TELUS Code of Conduct for Business Sales Activities and the Anti-Bribery and Corruption Policy for further details.

Political activities

As private citizens, we are free to engage in political activities and support causes, candidates or political parties of our choice. However, without the necessary prior and express TELUS approvals, TELUS must not be associated with personal political activities, including political contributions. For more information, please see the Anti-Bribery and Corruption Policy and the additional information on political contributions therein.

Charitable donations

All charitable contributions made by or on behalf of TELUS must be approved by the Community Investment team and recorded in accordance with the established approval process and guidelines, which include compliance with all applicable laws, this policy and other related policies including the Anti-Bribery and Corruption Policy and the TELUS Corporate Sponsorship Policy.

Proprietary rights and assets of others

We respect the proprietary rights and assets of others, including both tangible properties and intangible assets, such as those protected by intellectual property rights. We respect licenses and conditions of use that apply to the intellectual property of others. Copyright materials are not copied in whole or in part, or used in violation of any law or agreement with vendors, licensors or any other party.

Involvement in a legal matter

If you are involved in a legal matter, whether of a civil, criminal or regulatory nature, that has the potential to affect your ability to perform your job or harm the reputation or interests of TELUS, you must immediately inform your leader.

If a team member comes across a suspected illegal activity or material (e.g. child pornography) in the course of their work, they should report it immediately to the TELUS Security Office which will determine the appropriate course of action, such as reporting to the appropriate authorities.

Improper influence on the conduct of audits

Team members, or any person acting under the direction of a team member, are prohibited from directly or indirectly taking any action to improperly influence, coerce, manipulate or mislead TELUS' external or internal auditors or their representatives.

> Report unethical practices by any other party to your leader or the TELUS EthicsLine.

Respectful workplace / human rights

TELUS is committed to creating an inclusive workplace and leveraging the diversity of thought across our teams with the goal of fostering a shared sense of belonging. We are committed to treating all current, potential and past team members, as well as all partners, suppliers, shareholders and customers (and other stakeholders) with dignity, respect and fairness.

At TELUS, we aim to prevent unhealthy conflicts or unacceptable behaviours. When these issues do occur, we need to recognize and resolve them in a way that minimizes any negative impact on our team members.

TELUS' Respectful Workplace Policy outlines unacceptable behaviours (including discrimination and harassment) and expectations of all TELUS team members and contract employees. It applies to behaviours that have the potential to negatively impact the workplace, adversely affect employee relationships or lead to adverse job-related consequences for impacted individuals. This may include behaviour that occurs during or outside of working hours, and in any location where work-related interactions take place, whether physical or virtual, including on social media. It also includes circumstances in which domestic violence would likely lead to physical or psychological harm in the workplace. While customers, suppliers and other stakeholders are not directly subject to our internal policies, TELUS expects respectful and non-discriminatory behaviour from them, as we do from our own team.

Team members should immediately report any disturbing behaviours to a leader, People & Culture representative or the Respectful Workplace Office (RWO) for support. A failure to meet these expectations may result in discipline.

Our international teams are governed by the laws of the countries in which they operate, and will adapt the Respectful Workplace Policy as appropriate in accordance with local human rights and workplace safety laws. Team members are referred to the Respectful Workplace Policy for more information.

Valuing diversity and inclusion

A critical part of our respectful and inclusive culture is our commitment to honour individuality and celebrate the diversity within our team, our company and our communities. We believe the diversity of our team is a significant competitive advantage and we believe diversity thrives when we respect the identities, traditions, beliefs, lifestyles, abilities and perspectives of all members of our team. Please visit Go/Diversity site to learn more.

Our commitment to inclusiveness includes the provision of workplace accommodations related to protected human rights grounds in accordance with the law to allow all persons to perform meaningful work. Read the Workplace Accommodation Policy for more information.

Health and safety

We are committed to having healthy and safe operations in all our locations to protect the lives and health of our team members, protect our assets, ensure business continuity and engender public trust. When working on customer premises and public thoroughfares, we safeguard the rights and safety of customers, the public and ourselves.

We have operating standards, practices, systems, training, reporting and resources to implement the Health and Safety Policy.

We are expected to report to and to remain fit for work at all times during working hours. A lack of fitness for work caused by use of alcohol or drugs (including prescription or over-the-counter drugs) is a violation of the Alcohol & Drug Policy and must be immediately addressed. Even when you no longer feel the initial effects of alcohol or drugs, you may still be impaired and unfit for work. Team members are expected to report any observations of a potential violation of the policy, and should refer to the TELUS Alcohol and Drug Policy for further details. Consumption of alcohol at company functions and in business settings must be managed in accordance with the Alcohol & Drug Policy to eliminate the potential for driving under the influence.

Voluntary employment

All employees' work is voluntary, and employees may choose to terminate their employment at any time, subject to required notice. TELUS does not use child labour in any part of our business operations and complies with statutory and local requirements for the minimum age of employment.

Employment standards

Compensation paid to employees complies with all applicable employment standards, including those relating to minimum wages. Where no statutory employment standards exist, employees are paid at least the minimum local industry standard. Deductions from wages as a disciplinary measure is not permitted.

Contributing to our communities

We are committed to supporting the communities where our team members live and work. We encourage team members to give back to their local communities by volunteering and participating in charitable activities, such as TELUS Days of Giving.

While representing TELUS and contributing to our communities, we must:

- Adhere to TELUS values and uphold the standards in this Code
- Ensure that these outside activities do not interfere with our job performance or create a conflict of interest
- Obtain proper approval through the Community Investment team before donating TELUS funds or making contributions in TELUS' name
- Make it clear that the views expressed through our participation in community activities are our own personal views, not those of TELUS.

Environment, social & governance (ESG)

TELUS' values and social purpose are demonstrated by our compliance with applicable legal and regulatory requirements, as well as our actions and objectives around many environmental and social issues, such as climate change and human rights. Acknowledging the impact our business has on society, we strive to integrate environmental and social considerations into our governance and risk management processes. Team members are encouraged to consider environmental and social impacts in their decision making and strategic planning, as well as in operational activities.

Detailed information on our Environmental Policy, our ISO 14001:2015 certified Environmental Management System and other environmental compliance and information resources can be found on TELUS' intranet at go/environment. Detailed information on our sustainability and ESG strategies and progress can be found in our Sustainability Report.

Company assets and information

We take appropriate care to protect TELUS assets against undue risks, exposures and liabilities.

Company information

Unless specifically published for external use, all TELUS records, information, intellectual property, reports, data, plans, processes and methods, including information posted on internal websites, are considered corporate information and should not be disclosed without proper authorization. Access should be limited to those team members with a legitimate business reason to know the information. Team members should refer to the Security Policies for further details on the classification and safeguarding of TELUS' information assets.

Team members and past team members must not use or disclose TELUS trade secrets, competitive information or other confidential and/or proprietary information to benefit themselves or others, or for the purpose of competing with TELUS. In situations where we would be willing to share confidential information, Legal Services can assist in preparing a confidentiality agreement or license agreement to protect TELUS. Team members departing TELUS must not copy, download, forward or share TELUS' strategy or competitive or confidential information irrespective of document classification.

To protect the safety and integrity of our networks, only approved software can be used on TELUS equipment. No team member should knowingly install or use a software program or code that could damage TELUS' information assets. All team members are responsible for taking reasonable measures to ensure that software and data is clear of malicious code and safe for use in TELUS' electronic data processing environment.

Team members should also refer to Security Policies which outline responsibilities for exercising caution and reporting any suspected or actual security incidents such as phishing or malware.

> Take appropriate care to protect TELUS assets against undue risks, exposures and liabilities.

Public disclosure

TELUS is subject to strict securities rules regarding disclosure of financial and other material information to the public. Selective disclosure of confidential information by any team member can create liabilities for TELUS and for that team member. All discussions about TELUS in a public environment should comply with the Policy on Corporate Disclosure and Confidentiality of Information, to which team members should refer to for additional details. For further information, contact Investor Relations or Corporate Communications.

Examples of situations that may lead to inappropriate public disclosure include:

- Participating in an investment-related discussion forum, social media platform, chat room or blog. Team members must not discuss any confidential information about TELUS when participating in these activities online. Refer to our Social Media Guidelines.
- Discussion regarding TELUS with a member of the investment community or the media must be referred to team members specifically trained and authorized to communicate on behalf of TELUS. For more information, contact Investor Relations or Corporate Communications.
- Presentations to business, educational or community groups must be pre-approved and provided in advance to Investor Relations and Corporate Communications, and pre-approved when requested.
- For presentations to internal TELUS audiences, team members should confirm with their leader if their material includes confidential or sensitive information.

Business records and internal accounting controls

Accurate and reliable records are essential to enable us to meet our business, legal and financial obligations. We strive to ensure all records and other data (whether for external or internal use) are factual, complete, timely and understandable. This includes hours worked, invoices, benefit claims, and travel and expense reimbursement reports. Inaccurate or unsubstantiated records may be treated as fraud. Restricted and confidential information should be properly identified and respected as such, as outlined in our Security Policies.

TELUS has defined processes for retaining and disposing of records and documents in order to comply with business needs, as well as legal and regulatory requirements. Consult the Records Retention Policy for guidance on minimum and maximum retention periods, storage of records and suspension of records destruction due to a potential or ongoing litigation matter or investigation and where to obtain further information.

Financial transactions

All team members are expected to understand their role and responsibility regarding TELUS' financial transactions and records, and follow approved procedures to protect, report, control and accurately reflect these transactions. Refer to the Signing Authority Policy and other TELUS Finance policies for further details.

It is a violation of the Travel & Expense Policy to misuse TELUS-issued credit cards or make misrepresentations on expense statements.

We do not tamper with the network or systems to bypass billing, nor make unauthorized charges or credits to customer accounts.

Team members whose duties involve authentication and approval are responsible for the close scrutiny and timely verification of all documents upon which monies are paid or received in compliance with TELUS policies.

Safeguarding assets

We protect TELUS facilities, information, equipment, tools, supplies, vehicles, funds, communication networks and information systems against loss, theft, damage, vandalism, neglect, unauthorized use and unauthorized disposal.

Team members are the first line of defence in protecting TELUS assets and information, and are expected to take reasonable measures to safeguard access controls, such as passwords, identification cards, keys, cards and hand-held user authentication devices. It is also important that we not share our TELUS-provided computer or other communication devices or their access passwords, or compromise onsite security (e.g. leaving access doors open and unattended).

> Team members are the first line of defense in protecting TELUS assets and information.

Intellectual property

We work together to protect our intellectual property, just as we respect the proprietary rights of others as noted above.

Intellectual property rights enable TELUS to be known and recognized in the marketplace and help distinguish our products and services from those of our competitors. Intellectual property rights also protect the valuable intangible assets generated or acquired by the TELUS team. Examples of TELUS intellectual property include brands and logos (trademarks); software, artwork and marketing material (copyright); and inventions and business innovations (patents).

When we create intellectual property, individually or as part of a team, this property is owned by TELUS, and we work to document the ownership of such intellectual property. Unless specifically published for external use and public dissemination has occurred, all corporate records are considered TELUS information and should not be disclosed without proper authorization.

Team members should contact Legal Services for further information about intellectual property matters or the Brand Office for information on use of our brand. Additionally, team members who are served with any TELUS legal matters should contact Legal Services.

Personal use of communication devices

Communication equipment and devices (TELUS' or our own) are used for both business and personal purposes. Electronic communication may occur via a wide range of devices including, but not limited to, computers, telephones, smartphones and webcams. This can take the form of emails, texting, Internet searches, photographs, videos, audio files, blogs, social networking, peer-to-peer file transfers and physical exchange of media (e.g. USB storage devices).

As we communicate in any of these ways, we may identify ourselves as TELUS team members either by naming TELUS or by virtue of email or IP addresses.

While we permit team members to use TELUS-provided communications equipment and 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 on personal time, or during reasonable permitted breaks from work, subject to your leader's approval and the needs of the business.

Team members must comply with all TELUS policies when using TELUS-provided communication devices for personal use and should refer to the Security Acceptable Use Policy for more information.

TELUS uses automated tools to log team member use of its networks (e.g. voice, email, messaging, Intranet and Internet) and related equipment and devices and to monitor traffic (including content) on its networks in order to detect security threats and other problems. However, TELUS does not actively monitor employee email, messaging, telephone and Internet access, TELUS does reserve the right to do so. Note that improper use of TELUS' networks, equipment or devices may result in disciplinary action up to and including dismissal.

Use of 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 judgment 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 media; however, as a TELUS team member, you should adhere to the following:

- When posting about TELUS, always disclose that you are a TELUS team member and use the #TeamTELUS hashtag to help identify yourself.
- Any new social media handles that you create must be personal only and not include the TELUS name or branding in the handle, bio or content. Only the Brand Marketing & Social Media team is authorized to create new, official social media accounts for the business.
- Do not rate or review TELUS products and services on platforms like the App Store or post reviews on aggregate sites to artificially boost a product's score. Doing so can result in legal ramifications for TELUS.
- Do not disclose information that is confidential to TELUS or provided in confidence to TELUS, including upcoming promotions, device launches, internal communications or financial information, until the information has been made public by TELUS.
- Sharing information about services or offers on your personal accounts is acceptable; however, 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.
- Although team members are encouraged to share offers or promotions on social media, you cannot gather personal information, such as phone numbers, email addresses or any contact information for the purpose of generating sales. If someone is interested in an offer, tell them to direct message any of the official TELUS social media accounts or reach out to our support team on Twitter.

- Show respect toward other people and organizations, and avoid defamatory, discriminatory, harassing or sexual messages. We do not tolerate any form of bullying by team members on social media.
- If you disclose TELUS as your employer in social media, be aware of the personal content you share, like or comment on that could be considered offensive to others. Although these are your personal accounts, the content could be perceived negatively toward TELUS.
- Do not display the TELUS logo or brand images in personal communications or as background images on your profile without written permission from the Brand Marketing & Social Media team. We do, however, encourage team members to create their own content, reshare messages from Amplify and follow, retweet and or share approved content from the official TELUS social media handles.

For additional information regarding our team member policies, you can visit the Social Media Guidelines or contact the Social Media team at socialmedia@telus.com.

We encourage communication among our team members, customers and partners through social media.

Conflict of interest

What it means

As team members, we must avoid situations or relationships that conflict with the interests of TELUS and our work duties. 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

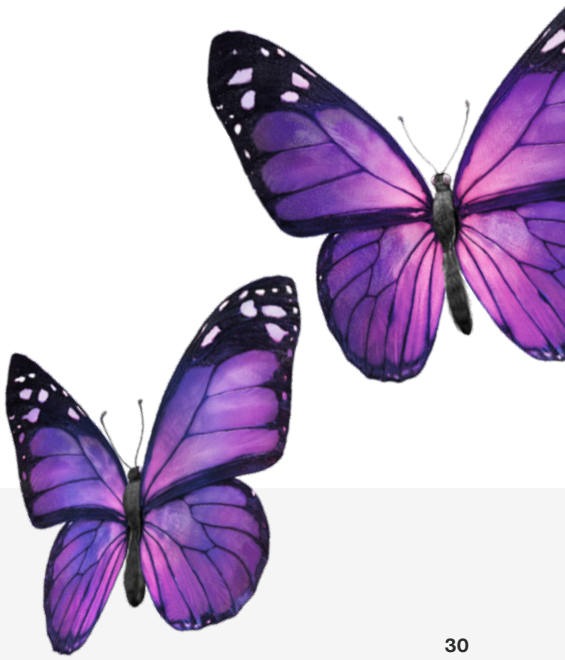
By thinking of ourselves first, we may act in a way that is damaging, or potentially damaging, to TELUS. We may also harm our personal reputation. In such circumstances, team members must take action to eliminate the conflict of interest or the perception of a conflict of interest.

How we do it

We make business decisions based on what is in the best interest of TELUS and not our individual interests. Team members must disclose actual or potential conflicts of interest to their leader or the Ethics Office. Each situation must be considered individually and regularly reviewed with the parties involved, level of access to business information, decision-making authority, job duties and 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 TELUS’ 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.

The following are common situations team members may encounter, which could present a conflict of interest.

> Team members must disclose actual or potential conflicts of interest to their leader or the Ethics Office.



Family members and personal relationships

A conflict of interest may occur when a team member can enhance or promote the interests of a family member or other close personal connections.

Situations may arise where broader familial relationships, friendships and other close personal associations (e.g. people living in the same home as a TELUS team member) cause real or perceived conflicts of interest or the possibility of real or perceived improper influence. Team members should be sensitive to these concerns and demonstrate good business judgment in the best interest of TELUS and in keeping with the spirit and intent of this Code.

TELUS Board members must disclose any family or personal relationship with TELUS team members or with TELUS job applicants to the Chair of the Corporate Governance Committee of the Board in order that the Committee may determine whether the relationship impacts the Board member's independence.

Board members, executives and senior leaders have a duty to disclose if they have a relationship with TELUS' external auditor.

Personal gain

Conflict of interest may occur when a team member or family member gains a personal benefit from: (a) a business relationship with TELUS, or (b) an outside business with which TELUS has a relationship, such as a partner, supplier, customer, competitor, contractor, consultant, agent or dealer. This personal benefit may arise from an ownership interest in, or a role as a director, officer or employee of an entity that is engaged in a business relationship with TELUS.

This guideline does not prohibit team members from holding publicly traded shares of an entity with which TELUS has a business relationship or a competitor, provided that the team member does not have a significant investment in the entity and does not acquire the shares, based on information that is material, undisclosed or confidential, obtained as a result of employment with TELUS or by being a member of the board of directors of a TELUS company.

To prevent conflicts of interest, team members may not:

- Be involved in any negotiations or transactions on behalf of TELUS with partners, suppliers, customers, contractors, consultants, agents or outside parties where the team member has a personal, commercial or financial interest in the outcome of the negotiations, or transactions unrelated to their role at TELUS.
- Participate in a decision to hire, transfer or promote a family member, or someone with whom they have a romantic or sexual relationship, or be in a position of direct or indirect influence over a family member who is an employee or contractor of TELUS.

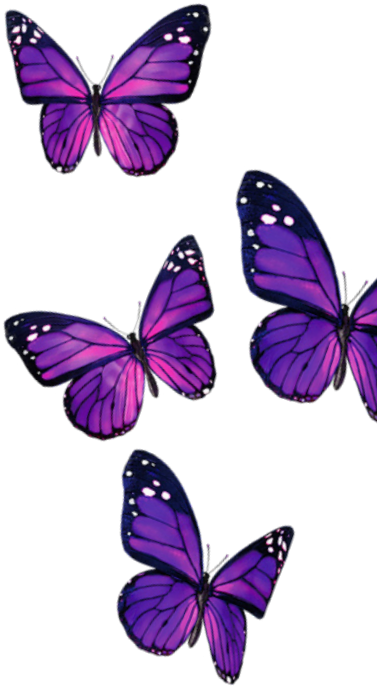
- Supervise a family member nor have direct or indirect authority over employment or contract-related decisions that impact a family member or someone with whom they have a romantic or sexual relationship, such as pay, performance ratings, work assignments, discipline, training or termination.
- Access or make adjustments to their own accounts or services of family members, friends, co-workers or acquaintances without authorization from their leader.
- Work for, or be contracted to, an independent TELUS dealer or a provincially regulated TELUS entity, such as TELUS Retail Limited and TELUS at the same time.

Ethical Sales Practices

Team members share a commitment to delivering on our Customers First priority, which includes being consistently mindful of our professional conduct and ethical sales practices, including obligations under our Code of Conduct for Business Sales Activities. We need to ensure when selling to a customer, we provide 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 needs, and we do not make any changes or modifications to their account without their consent, understanding and permission. Team members who are involved in selling or attempting to sell to existing and potential customers in the private or public sector, share a commitment to conduct business lawfully and with integrity.

Outside employment and other non-TELUS activities

Team members are free to engage in outside activities, including business activities on their own time. However, these activities must not conflict, or have the potential to conflict, with TELUS' best interests or with our obligations to TELUS, including our ability to perform our job for TELUS. As a general guideline, team members may not work for, or be engaged in activities for enterprises that are competitors or suppliers of TELUS. A conflict may arise by virtue of a role that we have with another company or organization, for example as a director, officer or employee of an entity that enters into a business relationship with TELUS, even where there is no personal benefit or gain to us from the outside relationship. A conflict may also arise if, for example, we use assets such as time, our corporate phone or laptop, or tools paid for or developed by TELUS, when engaged in outside business activities. If you are considering starting your own business, accepting a second job, or joining a board of directors, you are required to advise your leader or the Ethics Office, who will review the circumstances to ensure there is no conflict of interest.



It is a conflict of interest, irrespective of where we work (i.e. our declared "work style") to have outside interests or responsibilities that demand so much time and energy that they interfere with our ability to complete our TELUS work. It is also a conflict of interest to use TELUS time and resources to manage these activities, even if on a voluntary basis.

This could include any personal, community and charitable activities that require time and effort during normal working hours, except for situations where the individual is acting in a representative capacity at the request of TELUS, with the explicit and written permission of their leader.

Circumstances change, and a conflict may arise even where your leader or the Ethics Office has previously approved a relationship with an outside party. It is your responsibility to be attentive to these potential conflicts and to report any changes to your leader or the Ethics Office as they arise. In order to fulfill your obligations under this Code, you may need to step down from the outside role or make other arrangements acceptable to TELUS.

Future TELUS business

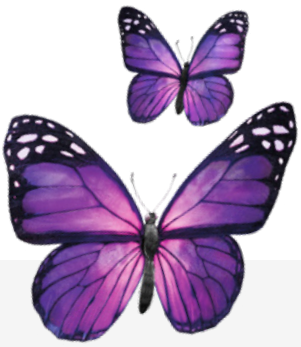
Over time, TELUS may expand into new businesses or change its product lines or services. Team members are responsible for re-examining their individual situations on a regular basis to avoid becoming involved in a conflict-of-interest situation where no such conflict previously existed.

Putting conflict of interest concepts into practice

To determine if you have a conflict of interest that should be disclosed, ask yourself these questions:

- Do my outside interests influence, or appear to influence, my ability to make sound business decisions for TELUS?
- Do I stand to improperly benefit from my involvement in this situation?
- Does a friend or relative of mine stand to improperly benefit?
- Could my participation in this activity interfere with my ability to do my job at TELUS?
- Is the situation causing me to put my own interests ahead of TELUS' interests?
- If the situation became public knowledge, could it negatively reflect on me or TELUS?

If you answered "yes" to any of the above questions, discuss the situation with your leader or the Ethics Office.



Insider trading

As detailed in the TELUS Insider Trading Policy, team members may not trade, recommend or encourage another person (such as a relative or friend) to trade, in shares or other securities of TELUS or of TELUS International while in possession of undisclosed material information relative to TELUS or TELUS International, as applicable. Nor may team members inform any other person of any undisclosed material information (commonly known as “tipping”), relative to TELUS or to TELUS International, except in very limited circumstances.

These prohibitions on trading and tipping also apply when you have knowledge of undisclosed material information relative to another public company that was gained during your work at TELUS. Material information in respect of a publicly traded company is information that results in, or could reasonably be expected to result in, a significant change in the market price or value of any of the listed securities of that company if generally disclosed.

Please see the TELUS Insider Trading Policy and the Policy on Disclosure and Confidentiality of Information for more information. Failure to comply with these policies and with securities laws in this area will expose you personally, as well as TELUS, to liability.

Gifts, benefits and hospitality

TELUS team members cannot authorize, offer or accept, directly or indirectly, gifts or benefits that are intended to influence, or appear to influence, to or from any organization or person having business dealings with TELUS, other than as described below. These guidelines and the Anti-Bribery and Corruption Policy apply at all times and do not change during traditional giving events or seasons.

Accepting or offering substantial gifts from contractors, suppliers, vendors and/or community partners could be seen as presumptively fraudulent because of the potential to create undue influence. Gifts of cash or cash equivalent (such as a gift card) should not be authorized, offered or accepted, regardless of the amount. If ever unsure of an offering, please contact your leader or the Ethics Office.

Gifts and benefits that are acceptable for TELUS team members to authorize, offer or accept in the normal course of business (and to engender goodwill and positive working relationships) are typically less than $250 CDN or the close equivalent in other currencies, and include:

- Sporting or cultural events
- Business lunches or dinners
- Transportation to or from a customer’s or supplier’s place of business
- Hospitality suites
- Small seasonal holiday gifts or prizes to be used in office draws and raffles

If you are not sure whether a gift or benefit is acceptable, ask yourself:

- Would the gift be considered customary, given the nature of your role with TELUS?
- If the gift or benefit was reported in the media or to the TELUS President and CEO, would the perception be neutral or positive?
- For offers of hospitality or entertainment, is the person extending the offer attending with you?

If the answers to these questions are “yes,” based on your good faith assessment, you may accept the gift.

If the answers to these questions are “no”, you should politely decline the gifts or entertainment. If that would be difficult or embarrassing to the provider, you may be able to accept the gift, but should ask your leader or contact the Ethics Office who will work with you to either donate the item to an approved charity, or to distribute the item to one of your peers.

It may be appropriate to attend third-party paid seminars or conferences or vendor-hosted events on behalf of TELUS if there is a clear benefit to TELUS for attending and the attendance is approved in advance by your leader. To avoid a real or perceived conflict of interest, te consider having TELUS fund incremental expenses (e.g. airfare and hotel) and remember that prizes given out at these events are considered gifts and should follow the same gifts and benefits guidelines as outlined above.

Team members with supplier selection, negotiation, purchasing or contract management roles within TELUS are subject to more stringent professional purchasing requirements regarding gifts and benefits and maintaining appropriate relationships with suppliers, and should therefore not accept any gifts or benefits from suppliers or potential suppliers without the explicit and written permission of their leader. Where the value of any gift or benefit is $250 or greater, the leader must also provide a copy of their authorization of that particular gift or benefit to the Ethics Office, including a description of the gift or benefit, approximate value, the name of the party conferring the gift or benefit and the reason.

Dealing with suppliers

We strive to ensure our business dealings with suppliers are ethical and that they understand our expectations of them as outlined in our Supplier Code of Conduct.

Selection and use of third parties/procurement

We expect our suppliers to meet or exceed the requirements set forth in the Supplier Code of Conduct and to enusre their affiliates, suppliers, employees and contractors to perform obligations for TELUS consistent with the standards set out in the Supplier Code of Conduct.

- We award business to suppliers who are in compliance with applicable laws in their business operations, including in their relationships with their employees, their communities and TELUS.
- We select our suppliers based upon objective and fair criteria, including business need, price, service, quality, reputation for ethical conduct and health, safety and environmental business considerations.

Adherence to applicable TELUS policies

- We expect the suppliers with whom we do business to demonstrate values and standards similar to those of TELUS.
- We strive to ensure that our suppliers are made aware of TELUS policies that are applicable to the work for which they are being engaged.

Supplier-funded incentive programs

- Supplier-funded incentive programs, often offered to our sales team by suppliers seeking to sell their products and services, must be approved in advance by an authorized program administrator who does not work with the eligible team members.

TELUS buying policy

Every TELUS team member who commits to buy services or products from a supplier on behalf of TELUS is responsible for:

- The prudent exercise of and adherence to internal controls
- Ensuring all transactions are justified and supported by business objectives
- Ensuring the best value for money spent; and complying with the TELUS Buying Policy.
- Consequently, at the beginning or renewal of every supply arrangement, these team members are required to protect the best interests of TELUS by performing a risk assessment on our potential or continuing suppliers and performing additional mandatory due diligence commensurate with all identified risk. For more information, please visit due diligence on go/marketplace.

Review Guidelines and Policies

If you need further assistance, review the following additional policies as they may apply to your situation.

Accessibility Policy

Acceptable Use Policy

Alcohol and Drug Corporate Policy

Anti-Bribery and Corruption Policy

Attendance Policy

Code of Conduct for Business Sales Activities

Policy on Corporate Disclosure and Confidentiality of Information

Corporate Security Policies and Corporate Security Manual

Employee Expense Policy

Environmental Policy

Hiring Processes and Guidelines

Insider Trading Policy

Policy on TELUS and the Charter of the French Language

Procurement Policies

Records Retention Policy

Respectful Workplace Policy

Signing Authority Policy

Social Media Guidelines

Supplier Code of Conduct

TELUS Health and Safety Policy

TELUS Health Privacy Policy

TELUS Health Privacy Commitment

TELUS Privacy Commitment

Team Member Privacy Commitment

TELUS Business Travel Policy

Violence Prevention in the Workplace: Investigation and Reporting Policy

Workplace Accommodation Policy

Work Styles Policy