

# Human Rights Policy

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Approved by the Management Board of Telefónica Deutschland Holding AG at its meeting on 3.11.2025.

This policy is applicable for all companies within the Telefónica Deutschland Group, i.e. all direct and indirect subsidiaries of Telefónica Deutschland Holding AG (also referred to in this document as "Telefónica Deutschland Group" or "Telefónica Deutschland").

Telefónica Deutschland Holding AG

Version 3 2025

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## 1. Introduction

At Telefónica Deutschland, we believe that communications technology is a fundamental pillar for the effective exercise of human rights, by facilitating access to information, the exchange of ideas and the generation of opportunities that boost individual and collective development. However, as with any other industry, the telecommunications sector is not immune to potential violations of human rights throughout its value chain.

This is why we have a Code of Ethics and Conduct, our Responsible Business Principles, and our Declaration of Principles on Respecting Human Rights which provide the guidelines we follow as a Company in all we do and demonstrates our commitment to **respecting and promoting internationally recognised human rights**, in line with the **United Nation's Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises**, and the different **international conventions and commitments** on human rights (*Annex Reference documents: International regulatory frameworks*).

This commitment is complemented by this Human Rights Policy and, more generally, by the rest of the Company's policies and procedures that safeguard respect for human rights in our operations and value chain.

### 1.1 Purpose

Through **this Policy**, Telefónica Deutschland sets out the general principles that constitute minimum requirements and define a **framework of action**, ensuring a consistent approach in line with international human rights standards.

The aim of this Policy is to:

- **Reiterate our commitment to human rights.**
- **Implement** Telefónica Deutschland due diligence process **regarding protecting and promoting human rights.**

### 1.2. Scope of application

This policy is **mandatory** for all companies of the Telefónica Deutschland Group. This includes all direct and indirect subsidiaries of Telefónica Deutschland Holding AG.

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Telefónica Deutschland is responsible for establishing the foundations and setting the instruments and mechanisms necessary for appropriate and efficient coordination between this Company and the other companies that make up its Group, all this without prejudice or detriment to the autonomous decision-making capacity corresponding to each of these companies, in accordance with the corporate interests of each of them and the legal obligations established in relation to the members of their management bodies.

## 2. Basic human rights principles relating to our stakeholders

Telefónica Deutschland undertakes to respect human rights in its relations with its stakeholders. These commitments are based on an approach to managing impacts, risks and opportunities (IROs) linked to human rights and its due diligence throughout the value chain:

### 2.1 Customers

We work to offer products and services that contribute to generating a positive impact on the lives of people. To this end, these are the principles that govern our activities:

- **Privacy:** Ensure the proper processing of personal data with the goal of respecting the fundamental rights and freedoms of individuals and, specifically, the fundamental right to the protection of personal data.
- **Cybersecurity:** Provide secure and reliable infrastructure and services to ensure the protection of our customers' data, preventing loss, modification, misuse or unauthorised access, and resolving any incidents that may arise in an efficient manner.
- **Freedom of expression and information:** Respect and work to promote the lawful exercise of the right to freedom of expression and information in all areas of our activities. All this, without prejudice to the duty to cooperate and respond to the requirements we receive from the competent authorities in these matters, within the legal framework applicable to each situation and in strict compliance with the regulations in force. In this respect, we try to minimise any possible impact on this right arising from such requirements, which must be consistent with the relevant legislation and whose execution must be proportional to the legitimate aim pursued.
- **Non-discrimination:** Prevent discriminatory treatment in our customer relations, whether to their detriment or advantage, based on skin colour, nationality, geographic and ethnic origin, religion, gender, sexual orientation and gender identity, marital status, age, disability, socio-economic conditions or family responsibilities, in order to facilitate access to our products and services, in the customer care processes through our contact channels, in our communication activities, by training our employees or in the use of new technologies.
- **Protection of vulnerable groups and individuals:** Identify, respect and protect the rights of women, individuals and vulnerable groups, including, among others, children and adolescents, older people, people with disabilities and people experiencing social exclusion.

- **Development and responsible use of products and services:** Incorporate responsible practices into the design and development of our value propositions, including those based on new technologies, to encourage access to information and to our products and services, and foster control measures that contribute to the health and safety of people during the development and use of such products and services.

## 2.2 Employees

We respect the rights of our employees and have internal policies and processes in place to promote them. They are aimed at achieving the following objectives:

- **Fair working conditions:** Ensure fulfilment of fair and equitable working conditions for our employees, by promoting measures that are intended to promote secure employment, working times, adequate wages, equal pay for work of equal value, social dialogue and work-life balance.
- **Freedom of association and the right to collective bargaining:** Encourage freedom of association, the existence of works councils and workers' rights to information, consultation and participation, as well as the right to industrial action and the right to collective bargaining regardless of the area where we conduct our operations. We promote fair treatment of staff, decent working conditions and environmentally sustainable practices in the company and engage with work councils on these matters. We work towards preventing, that membership of trade unions or workers' representative bodies, from placing employees at a disadvantage, such as through discrimination, intimidation or reprisals.
- **Health and safety:** Provide a physically and mentally safe and healthy work environment at all our facilities through the adoption of occupational health and safety procedures and regulations. Promote mechanisms to achieve work-life balance and the right to rest. Promote the communication and reinforcement of a safety culture, developing awareness of the risk and encouraging responsible behaviour by its workers through information and training sessions, among other activities.
- **Diversity, non-discrimination, inclusion and equal opportunities:** Promote diversity and equal opportunities and prevent the discriminatory treatment of people in all areas of our organisation and particularly of vulnerable groups, without bias associated with skin colour, nationality, geographic and ethnic origin, religion, gender, sexual orientation and gender identity, marital status, age, socio-economic situation,

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disability or family responsibilities. We acknowledge that individuals may face multiple discrimination arising from the combination of several of these aspects.

Promote equal salaries among similar positions in similar contexts, rejecting any type of sex-based discrimination in remuneration, promotion or career advancement to leadership and decision-making positions.

Reject all forms of violence, harassment, threatening or intimidation – whether verbal, physical or sexual – in the workplace.

- **Training:** Promote training and development of professional and personal abilities in the workplace. Offer continuous learning opportunities that improve employees' skills, support career advancement and foster a culture of continuous improvement, inclusion and ethical awareness at all levels of the organisation.
- **Fight against forced labour, modern slavery and child labour:** Prohibit and reject any form of forced labour, slavery or human trafficking within our operations. Prevent, detect and correct practices that may give rise to these situations. We do not charge agency fees for recruiting employees and do not keep hold of any identity documents belonging to our staff. Respect the rights of children and adolescents. Prohibit and reject the use of child labour in our operations, verifying that, in our hiring processes, all employees are above the local legal minimum working age, respecting, in any case, the provisions of Convention No. 138 and 182 of the International Labour Organization.
- **Privacy:** Ensure the proper processing of personal data with the goal of respecting the fundamental rights and freedoms of individuals and, specifically, the fundamental right to the protection of personal data.
- **Cybersecurity:** Provide secure and reliable infrastructure and services to ensure the protection of our employees' data, preventing loss, modification, misuse or unauthorised access, and resolving any incidents that may arise in an efficient manner.

## 2.3 Suppliers and business partners in the value chain

We are committed to diligent management of our relations with suppliers and their employees, contractors and subcontractors, and other business partners.

To this end, we share our sustainability commitments with them through Telefónica Deutschland's Supply Chain Sustainability Policy and/or establishing contractual clauses in strategic agreements, such as mergers and acquisitions or divestment processes, among

others. Telefónica Deutschland may require suppliers and partners with significant risks to provide evidence of the integration of due diligence regarding human rights and the environment.

## 2.4 Society and environment

We work to contribute to the sustainable growth of the societies in which we are present. To this end, we ensure compliance with the legislation in force in all the markets in which we operate, focusing particularly, due to their impact on the sustainable development of these societies, on the following areas:

- **Anti-corruption:** Act with honesty and integrity. Fight corruption in its different forms through the implementation of a control system designed based on the risks and consisting of preventive, detection and response measures, in an environment of evolving and continuous improvement of the model, supported by specific training for our employees on the subject.
- **Competitive behaviour:** Act in the market honestly and transparently, without engaging in practices that alter free competition and thus respecting the right of consumers to choose freely between competitors.
- **Fiscal responsibility:** Manage fiscal affairs in compliance with prevailing tax laws at all times, reflecting the true and fair view of the Group through transparency, publicly disclosing fiscal information in a visible, understandable and comprehensive manner.
- **Digital inclusion:** Boost connectivity in local communities and remote or hard-to-reach areas with the goal of reducing the digital divide. Contribute to initiatives related to digital education and access to technology by vulnerable groups.
- **Digital skills:** Foster digital skills through initiatives that highlight the opportunities of digitalisation and reduce reticence towards new technologies. Support protection of young people, combating digital risks such as incitement to hatred, disinformation, cyberbullying and psychological stress. Train parents and educators to foster safe, responsible and informed digital participation for all.
- **Stakeholder collaboration:** Offer stakeholders reporting and complaint mechanisms, so that they can state their concerns, promoting diligent management of these.



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- **Communities:** Respect the economic, social, cultural, civil and political rights of groups such as local communities, vulnerable groups, minorities and indigenous peoples, with the goal of maintaining collaborative relationships within a framework of trust.
- **Environment:** Contribute to the protection of the environment and encourage a healthy environment for people, applying the principles contained in the Environmental and Energy Policy.

In general terms, Telefónica Deutschland promotes a culture of respect for human rights and actions to educate and raise awareness about this subject among all the people linked to the Company and its other stakeholders.

### 3. Due diligence

As part of our commitment to respecting human rights and the environment, and as established in the German Supply Chain Act (LkSG) and in the European Corporate Sustainability Due Diligence Directive (CSDDD), as well as in the United Nation's Guiding Principles on Business and Human Rights and other international standards, we have a due diligence process on these matters. The purpose is to identify, assess, monitor and prioritise, on a regular basis, the actual and potential impacts on human rights and the environment, as well as, where appropriate, to implement measures to address, prevent, mitigate, and remedy or redress any such adverse impacts and their potential repercussions, both in our operations and throughout the chain of activities, and all this in active and transparent dialogue with our internal and external stakeholders.

The human rights and environmental due diligence process is explained in detail in our Declaration of Principles on Respecting Human Rights.

### 4. Whistleblowing Channel

Telefónica Deutschland provides a whistle-blowing system to all employees, suppliers, business partners, stakeholders and customers as well as other potentially affected parties. It allows for the reporting of risks and violations in relation to the protection of human rights and the environment in the various areas of business and throughout the supply chains of Telefónica Deutschland.

All reports are treated confidentially and examined carefully. The protection of the reporting person is paramount.

The following reporting channels are available:

#### **Ombudsperson**

- By email: [dr-buchert@dr-buchert.de](mailto:dr-buchert@dr-buchert.de)
- By fax: +49 (0)69 7103 4444
- By phone: +49 (0)69 7103 3330
- By post: Rechtsanwalt Dr. Rainer Buchert, Bleidenstraße 1, 60311 Frankfurt am Main
- Via the [contact form](#)

#### **Human rights inbox**

- [Humanrights-de@telefonica.com](mailto:Humanrights-de@telefonica.com) to report human rights and environmental-related risks or violations

#### **Human Rights Officer**

- Employees can also relay reports to the Human Rights Officer.

Detailed information on the whistle-blower procedure can be found in the [rules of procedure for complaints/whistle-blowing](#) as well as on the corresponding [company webpage](#).

## **5. Governance**

The Management Board of Telefónica Deutschland bears overall responsibility for the due diligence process for human rights. A Three Lines of Defence model implements the due diligence process and ensures the independent review as well as the continuous development of the human rights and environmental risk management.

- **The first line of defence:** relevant departments are responsible for operational implementation of the due diligence processes, in particular the identification and assessment of risks as well as the implementation of measures.
- **The second line of defence:** human rights management structure, comprising the Human Rights Officer, coordinators, experts and the Human Rights Committee. The Human Rights Officer monitors the progress of due diligence implementation and reports to the Management Board. The coordinators and experts maintain the implementation, develop methodological approaches for carrying out the due diligence processes, perform quality assurance or periodically review this and other related Policies. The cross-departmental Human Rights Committee supports the Human Rights Officer and leads investigations falling within the remit of the whistle-blower system.
- **The third line of defence:** the effectiveness of the risk management system is reviewed regularly.

When implementing the outlined due diligence processes, we continually take into account the perspectives of those potentially affected and of vulnerable groups. It is important to us that the perspective and expectations of those affected are taken into account in the assessment of risks and violations, in the development of preventive measures and remedial actions, and in the processing of complaints.

## **6. Disclosure and communication of the Policy**

To disseminate and broaden the reach of this Policy, Telefónica Deutschland publishes it on the corporate website. In addition, it is published internally on corporate channels and the intranet. Through all this, Telefónica promotes access to and awareness of the content of this Policy among all employees and its stakeholders.

Each year, the Company includes information about the implementation of this Policy and its related processes in its sustainability report.

## **7. Implementation**

The implementation of this Policy shall be promoted by the corporate areas whose remit is related to the different matters. Coordination will be conducted through the aforementioned governance, and particularly through the global and local due diligence process.

## **8. Internal audit**

The Internal Audit Department may perform the analyses and checks deemed appropriate to verify the correct application of the aspects contained in this regulation.

## **9. Entry into force**

This Policy will enter into force following its **approval by the Management Board** of Telefónica Deutschland and repeals the policy previously in force.

## **Annex: Reference documents**

### *International regulatory frameworks*

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct
- International Labour Organization (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- International Labour Organization Declaration on Fundamental Principles and Rights at Work and the International Labour Organization (ILO) fundamental conventions
- Ten Principles of the United Nations Global Compact
- United Nations International Bill of Human Rights, which includes:
  - The Universal Declaration of Human Rights (UDHR)
  - The International Covenant on Civil and Political Rights (ICCPR)
  - The International Covenant on Economic, Social and Cultural Rights (ICESCR)
- United Nations Declaration on the Rights of Indigenous Peoples
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Rights of Persons with Disabilities
- United Nations 2030 Agenda for Sustainable Development (SDGs)
- OECD Due Diligence Guidance for Responsible Business Conduct
- European Convention for the Protection of Human Rights and Fundamental Freedoms
- European Social Charter and the Charter of Fundamental Rights of the European Union
- German Act on Corporate Due Diligence Obligations in Supply Chains (LKSG)
- Directive (EU) 2024/1760 of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859

### *Internal regulations*

In addition, some of the internal regulations that complement this Policy in relation with our commitment to human rights are listed below:

- Declaration of Principles on Respecting Human Rights
- Supply Chain Sustainability Policy
- Environmental and Energy Policy
- Anti-corruption Policy
- Group Standard on Data Policy
- Information Security Policy
- Occupational Health, Safety and Well-Being Regulation
- Diversity and Inclusion Policy
- Equality Policy
- Guideline for ethically responsible communication
- Whistleblowing Policy
- Rules of Procedure: Complaints Procedure

### *Other documents:*

- Responsible Business Principles
- Commitment to children's rights
- Telefónica's Artificial Intelligence Principles: AI Code of Conduct
- Customer Relationship Principles