Guideline for ethically responsible communication Telefónica Deutschland

Company policy

Approved by the Management Board of Telefónica Deutschland in December 2024

Telefónica Deutschland

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1. Introduction

In an increasingly networked and transparent world, how and what companies communicate is important. Communication influences how companies are perceived. It determines their reputation, credibility and the quality of relationships with employees, customers and other stakeholders. At Telefónica Deutschland, communication is an integral part of the corporate strategy.

The guideline for ethically responsible communication serves our employees as a guide for internal and external communication. It is intended to help us build trust, ensure long-term success and assume social responsibility. By embedding these ethical principles, we are committed to acting responsibly towards our stakeholders, practicing ethical and high-quality communication and making a positive contribution to society. We firmly believe that ethical communication is the key to longterm success and a strong, trustworthy corporate brand. Our policy is based in particular the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights (UNGPs) and laws on the protection of intellectual property and data protection. The guideline is integrated into Telefónica Deutschland's human rights due diligence management system in accordance with the due diligence processes specified by the OECD Guidelines and UNGPs. In terms of the protection of minors, the policy is based on UNICEF's Children's Rights and Business Principles and the applicable legal situation in Germany, in particular the Interstate Treaty on the Protection of Minors in the Media.

Fundamentally, our communication reflects the values and principles that guide our company. We are committed to responsible digitalization. The purpose of our company is to democratize access to responsible digitalization in order to create a better everyday life for everyone. Our telecommunications networks give people this access and make it easier for them to communicate and network. At the same time, we ourselves communicate as a company. In doing so, we promote freedom of expression, pluralism and diversity and are committed to inclusion, education and truthful information

2. Purpose and scope of this directive

The purpose of this policy is to set out principles of conduct for our company and our employees in relation to our communication content and communication channels. It basically covers communication to employees, customers, consumers in general, partners, media, authorities, politics and society as a whole.

This general guideline sets out an ethical framework. It is a company guideline and as such is to be applied in all Telefónica Deutschland companies.

3. Communication principles

3.1 General principles

In general, Telefónica Deutschland communicates in accordance with the following principles:

Legality: When we communicate content (whether our own or third-party content), we promote and respect compliance with the national and international laws that apply to us - in particular the UNGPs and the laws on the protection of intellectual property and data protection. Furthermore, we do not communicate any content that incites unlawful behavior, violence, discrimination or exclusion based on gender, religion, ethnicity, economic status, education, political or sexual orientation.

Integrity and transparency: We communicate honestly, respectfully and truthfully. We always strive to avoid omissions, ambiguities or any other form that could lead to error or deception.

Truth and accuracy: We base our communication on verifiable facts and reliable sources. If errors or misunderstandings occur, we correct them immediately and transparently. In particular, we are already endeavoring to implement important contents of the EmpCo Directive (Directive 2024/825 "Empowering consumers for the green transition"), which will apply in the EU member states by 27.09.2026 at the latest.

Neutrality: As a company, we do not position ourselves politically, and we promote the right to freedom of expression within the regulatory framework to which we are subject.

Respect and inclusion: Our communication respects all individuals and groups, regardless of ethnicity, gender, age, religion, sexual orientation or other personal characteristics. We strive to use inclusive language, avoid all forms of discrimination and provide barrier-free access to our digital communication channels and content

3.2 Protection of minors

We feel particularly committed to children and young people and are guided by UNICEF's Children's Rights and Business Principles as well as the applicable legal situation in Germany, in particular the Interstate Treaty on the Protection of Minors in the Media. We have an internal youth protection officer who, according to legal requirements in accordance with Section 7 (1) JMStV. Compliance with the important legal requirements for the protection of minors in the media in Germany is our top priority. Our communication does not compromise children's individual rights, honor, privacy and self-image. We ensure that it has no negative impact on children's rights. And we help to protect children and young people from content and communication that could cause them physical, moral or psychological harm. The use of stereotypes and the depiction of unrealistic or sexualized body images, for example, has a stronger negative effect on children, which is why we generally refrain from doing so. We also refrain from depicting children and young people in dangerous

situations. In our product labels, we provide parents with precise and easy-to-understand information that they need to exercise their children's rights. We do not exploit the special relationship that children and young people have with people they trust - such as parents and teachers - or the gullibility and inexperience of children and young people. In our communications, children and young people are not directly encouraged to persuade others to buy a particular service or product. We also work together with child protection initiatives, for example in the removal of child pornography content - if the country's legislation permits this - and with initiatives that promote the responsible use of technology by children.

3.3 Sustainability

In our communications, we make a contribution to the company's sustainability goals; in particular

- We enable internal and external communication formats in the digital space. In this way, we improve our own carbon footprint and enable our business partners to do the same.
- We try to avoid printed communication materials as far as possible. Where possible, we use digital alternatives to reduce paper consumption.
- We centralize the storage locations of audiovisual digital content in order to keep data volumes and therefore energy requirements as low as possible.
- We try to ensure the economical, efficient use of materials. Where feasible, we focus on multiple use and resource-saving alternatives, such as using recycled materials and avoiding plastic as far as possible.
- For the majority of our events, we aim to work with caterers who focus on sustainability and regionality wherever possible.
- As far as possible, we are reducing items that contain electronics.
- In the production and selection of advertising materials (e.g. giveaways, promotional gifts, textiles), vehicles,
  services, event locations, electrical/electronic equipment for competitions, interior design elements, catering, etc., we always pay attention to comprehensible social and ecological sustainability aspects. Where possible, we source these products and services in Europe in order to avoid long transportation routes and guarantee minimum standards of working conditions.
- As part of our purchasing process, we require our suppliers - including production companies and communications agencies - to comply with sustainability aspects; see "Supply Chain Sustainability Policy".

3.4 Communication with customers

In our communication with customers, we try to ensure that the information is complete, sufficient and detailed. We avoid jargon and - as far as possible - small print and provide all the information necessary to understand the conditions associated with our products. We measure our customers' satisfaction with our communication with the help of customer feedback. This enables us to continuously improve the customer experience.
We respect and promote the values contained in our Business Principles and our Diversity Policy. In this regard, the following applies to our advertising messages and sponsorships:

- Refrain from and prevent discriminatory communication and content in all our wording, images, documents, advertising and communication materials - both internally and externally.
- Do not take advantage of consumers' good faith.
- Do not jeopardize human dignity.
- Do not use messages or images that promote alcohol consumption, smoking, drug use, eating disorders or terrorism.
- Never incite hatred, violence or discrimination based on race, nationality, religion, gender, sexual orientation or physical or mental disability.
- Use only neutral and non-sexist language.
- Do not encourage consumers to engage in illegal or environmentally harmful activities.
- Do not exploit the naivety / gullibility and easy manipulability of children.

We always strive to avoid broadcasting Telefónica advertising campaigns in the context of programs or on channels that are not in line with our values and business principles. We actively manage through appropriate tools and mechanisms not to place our advertising in the context of xenophobia, discrimination, racism or hate. We provide clear and understandable information on prices, content, safe use, environmental features, storage, disposal of goods and services as well as data protection issues and complaints procedures. This enables consumers to make informed decisions.

We are committed to not using deceptive, misleading or fraudulent practices that could affect or harm consumer choice. We focus on transparency and fairness to protect consumers and promote fair competition.

Our aim is to help consumers make informed decisions and develop a better understanding of the impact of their choices. We are committed to sustainable consumption.

In our activities, we take into account both the needs of consumers, especially those who may be vulnerable or disadvantaged, and the specific challenges that e-commerce can pose for consumers.

The principles for communication mentioned here apply to all our communication channels in word, image and writing, whether digital or analog touchpoints.

These guidelines are reflected in our contracts with the advertising and media agencies we work with

Further details on O_2 brand communication can be found in the ethical guidelines for marketing communication. These define specific rules for everyday marketing practice. In this way, we clarify our claim to communicate convincingly and ethically.

3.Communication with various interest groups

The following applies in particular to our communication with supervisory authorities: We provide truthful, complete, timely and clear information in the reports we submit to

the relevant supervisory authorities and in other public communications from the company.

Employees communicate in various contexts with a variety of interest groups. As a general rule, messages transmitted on behalf of Telefónica Deutschland and all its brands must reflect the official position of the company. Personal opinions of employees or external representatives speaking on behalf of Telefónica Deutschland are not permitted. Those transmitting the messages must be authorized to do so.

Social media profiles in particular are operated privately by employees. Even the extension of company or brand content via one's own profile does not constitute a statement on behalf of the company. We make this clear to all employees in our social media guidelines.

As a general rule, we do not disclose any information that is classified as restricted or secret. We adhere to the guidelines in the Telefónica Business Principles.

3.6 Corporate communication via social networks

We promote the use of social networks for communication with customers and society in general, as they are an essential tool for active listening, dialog and a trusting relationship with consumers and other stakeholders.

When communicating via social networks on behalf of Telefónica Deutschland and all its brands, the following rules must be observed:

- The communication principles described above also apply to social networks.
- In particular, we do not transmit any messages that are offensive or defamatory towards employees, customers or other groups.
- We also do not transmit content that intimidates, harasses, offends or threatens any person or organization.
- In addition, the applicable social media guidelines of Telefónica Deutschland are followed.

3.Generation of audiovisual content

When we produce audiovisual content or make it available to customers, we are guided by the same general principles of legality, integrity and transparency, neutrality and the protection of children. In particular, we refrain from anything that would encourage the consumption of tobacco, alcohol, gambling and junk food. We promote the values set out in our Principles for Responsible Business, such as diversity, inclusion of people with all types of disabilities and protection of the environment.

When selecting our cooperation partners from the fields of art, music and film, we respect artistic freedom, which must necessarily remain within the legal framework and could also take place in publicly accessible media.

3.Use of artificial intelligence

We want people to recognize at a glance when content has been created with artificial intelligence. That is why we make corresponding audiovisual content and texts recognizable. The principles of communication formulated in this policy also apply to AI-generated content. In particular, we ensure that AI applications do not lead to prejudice or discrimination and that human rights and data protection are protected. In doing so, we follow the Group's AI principles.

3.Broadcasting of third-party advertising

As far as possible, we ensure that the advertising we broadcast from third parties:

- does not contain messages that incite discrimination, hatred, violence or illegal behavior.
- is appropriate to the age rating of the content to which it relates.
- codes of conduct and self-regulation in relation to the advertising of certain goods or services.

To this end, we use technologies that allow us to exclude certain environments (including violence, hate speech, weapons, sensitive social issues, politics, religion) (known as brand safety) and recognize positive environments (known as brand suitability).

As far as possible, we also apply these standards to the advertising of our partners, e.g. partner stores.

4. Reputation management

Telefónica Deutschland is a strong voice in the debates that are relevant to the digital future of our employees, our company, our customers and the state, economy and society in general. This includes the company addressing topics such as network expansion, digital transformation, digital participation, ecological and social sustainability, innovation, technology trends, regulation and Germany's future viability. The company has established a cross-divisional Reputation Committee. This committee uses smart analysis methods to identify and address opportunities and potential risks for company-wide reputation-building communication at an early stage and coordinate suitable operational and communication measures.

If a situation arises that could have a lasting negative impact on the reputation or image of the company or one of its brands and that cannot be dealt with via existing company processes, we follow our crisis management system. The Communication Director - or the person responsible for communication - initiates the process. If the decision is made to classify a situation as a crisis, a multidisciplinary crisis team is convened, depending on the subject of the communication. The crisis team will:

- Analyze the risk situation and its possible effects.

- Design and implement a communication strategy aimed at mitigating the negative impact on the company's reputation, assigning a specific role to each department involved.
- Report to the Board of Directors as often as it deems necessary.
- Conduct a retrospective analysis - with the aim of avoiding this risk and improving communication management regarding this type of crisis in the future.

5. Responsible communication channels

Telefónica Deutschland offers several channels on www.telefonica.de that are available to all stakeholders. Inquiries, requests and all other aspects related to our Business Principles and all related policies and regulations, and in particular this policy, can be reported via the reporting channel mailto:impressum@cc.o2online.de. The reporting channel mailto:humanrights-de@telefonica.com is available for complaints and information on human rights violations. All reports via these channels will be treated in accordance with the principles of respect, confidentiality, justifiability and completeness. All reported irregularities or actions that violate the law or internal regulations will be dealt with in accordance with the provisions of the Telefónica Policy.

6.Implementation

Each department affected by the content of this policy ensures that it is properly implemented. In principle, various approval processes have been established within the company. Communication and its results are checked by daily monitoring and analysis of internal and external media.
This policy comes into force on the day after its approval. It is deposited in the Telefónica Deutschland rules portal under the top rules