



# **Guideline for ethically responsible communication Telefónica Deutschland**



## Corporate Policy

Approved by the Management Board of Telefónica Deutschland in February 2022

Telefónica Deutschland

# Index

Index .....	3
1 Introduction .....	4
2 Purpose and scope of this guideline .....	5
3 Communication Principles .....	5
3.1 General Principles .....	5
3.2 Communicating with customers through advertising .....	7
3.3 Communication with other stakeholders .....	8
3.4 Communication via social networks .....	8
3.5 Content creation .....	9
3.6 Broadcasting of advertising by third parties .....	9
4 Reputation management .....	9
5. Responsible communication channels .....	10
6. Implementation .....	10

# 1. Introduction

Communication has always been very important in the lives of people and businesses. With the advent of the internet, apps, social media, self-made content, etc., communication has increased exponentially. Telefónica Deutschland is a technology company dedicated to communication. We enable people to communicate in a streamlined and agile way - and we also create content ourselves.

People's need to communicate, consume and generate content has also grown: people want to continuously communicate and connect using mobile applications to be entertained as well as to find out what is happening in the world in real time. The increased importance of communication has improved our lives and made them much easier. At the same time, it has also led to concerns in society about ethical principles - towards all those who enable communication, operate communication channels and generate content.

Telefónica Deutschland is aware of the dilemma that constant connectivity brings and takes its responsibility in this area through its business principles. These serve as a guideline for our employees and partners on how we conduct our business. In terms of responsible communication, we follow these principles:

As a company, we democratise access to sustainable digitalisation to create a better everyday life for all. In doing so, we promote freedom of expression, pluralism, diversity and advocate for inclusion, education and truthful information. As a company that is not only committed to facilitating communication, but also generates cultural, sporting, promotional, entertainment, educational as well as other content - which could have an impact and influence on society - we take responsibility by promoting responsible, ethical and quality communication.

## 2. Purpose and scope of this policy

The purpose of this policy is to set out principles of action for our company and our employees in relation to our communication channels and content creation. These general guidelines set out an ethical framework for Telefónica Deutschland.

This policy constitutes a corporate policy and as such is to be applied in all Telefónica Deutschland companies.

## 3. Communication principles

### 3.1 General principles

As a general rule, Telefónica Deutschland promotes communication in accordance with the following principles:

**Lawfulness:** when we communicate content (whether our own or others'), we promote and respect compliance with the national and international laws that apply to us - in particular the human rights internationally recognised by the "United Nations Universal Declaration of Human Rights", as well as the laws on the protection of intellectual property and data protection. Furthermore, we do not communicate content that incites unlawful behaviour, violence, discrimination or exclusion based on gender, religion, race, economic status, education, political or sexual orientation.

**Integrity and transparency:** We are honest and respectful in our communications as well as in our content and always strive to avoid omissions, ambiguities or any other form that could lead to error or deception.

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

**Gender-inclusive language:** We set an example against discrimination and for more equality and tolerance in everyday life - and want to make diversity visible in language as well. Therefore, we pay attention to gender-inclusive language in (official) communication at Telefónica Deutschland.

**Protection of minors:** We feel a special obligation towards children and young people and are guided by UNICEF's Children's Rights and Business Principles as well as the current legal situation in Germany, in particular the Interstate Treaty on the Protection of Minors in the Media. Compliance with the important legal requirements for the protection of minors in the media in Germany is our top priority. Our communication does not interfere with the individual rights of children (honour, privacy and self-image). We ensure that it does not have a negative impact on the rights of the child and 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 portrayal of unrealistic or sexualised body images, for example, leave a stronger negative impact on children, so these are generally avoided.

We also refrain from depicting children and young people in dangerous situations. In our product labels, we provide parents with all the information they need to exercise their children's rights in a precise and easy-to-understand manner. We do not exploit the special relationship of children and adolescents to persons of trust (e.g. parents, teachers) or the gullibility and inexperience of children

and adolescents. In our communication, children and young people are not directly encouraged to persuade others to buy a particular service or product. We also cooperate with child protection initiatives, such as the removal of child pornography content - if permitted by the country's legislation - as well as initiatives that promote the responsible use of technology by children.

**Sustainability:** As a digital group, we use digitalisation to achieve sustainability goals. We also implement this consistently in our communication:

- "Digital by Default" applies to our work; we therefore work digitally whenever possible. In this way, we reduce business trips as well as commuting to the workplace and thus make an important contribution to CO<sub>2</sub> reduction.
- We shift press events, press meetings and roadshows to the digital space as far as possible. In this way, we improve our own carbon footprint and make it possible for our dialogue partners to do the same.
- Wherever possible, we avoid printed communication materials and thus reduce paper consumption.
- We aim to provide our clients with barrier-free access to our digital communication channels and content at all times.
- We centralise the storage locations of digital content (images and videos) to keep data volumes and energy consumption as low as possible.
- We use a digital editorial tool that supports our communication staff in their remote work and at the same time ensures maximum transparency in communication planning and implementation. This also enables us to better meet the requirements of quality audits as well as data security and protection.
- We promote the digital competence of our communication staff with training courses.
- We use our social media guidelines to teach employees how to use social media.
- We work in diverse teams.
- We participate as a division in corporate activities for social purposes.
- Of course, we also oblige our suppliers - including production companies, communication agencies and business clients - to comply with sustainability aspects as part of our purchasing guidelines.

**Responsible use of resources:** We focus on the economical, efficient use of materials, always switch to reusable materials and to alternatives that conserve resources (e.g. recycled paper).

**Economy:** Do we really need the advertising materials? Can digital alternatives be used?

- Wherever possible and sensible, we replace printed material with digital alternatives.
- We reduce promotional items that contain electronics.

**Reusability:** Are there promotional materials that can be reused or can at least recycled materials be used?

- For printed material, we use environmentally certified paper (e.g. FSC) whenever possible.
- Wherever possible and sensible, we avoid using plastics and prefer recycled material.

**Resource conservation and minimum social standards for new purchases: We comply with minimum standards for new purchases.**

- When producing advertising materials, we always pay attention to comprehensible social and ecological sustainability aspects. Wherever possible, we source promotional products in Europe to avoid long transport routes and ensure minimum standards of working conditions.
- When selecting promotional items, giveaways, textiles, vehicles, services, event locations, electrical / electronic equipment for competitions, elements of interior design, catering, etc., we observe the specifications of our "[Supply Chain Sustainability Policy](#)".
- We clarify and document the legal issues that arise for promotional materials (obligations of manufacturers and distributors, labelling requirements, etc.) before ordering materials

## 3.2 Communication with customers via advertising

In our communication with customers, we try to ensure that the information is complete, sufficient and detailed. We avoid technical language and - as far as possible - small print, and provide all the information necessary to understand the terms and conditions of our products.

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 communications and content in all our wording, images, documents, promotional and communication materials - both internal and external.
- Do not exploit the credulity of consumers.
- Do not compromise 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 or 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 children's naivety/glibness and ease of manipulation.

We always strive to avoid broadcasting Telefónica advertising campaigns on programmes or 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.

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

Further details on O<sub>2</sub> brand communication can be found in the separate O<sub>2</sub> Brand Policy.

### 3.3 Communication with other stakeholders

We provide truthful, complete, timely and clear information in the reports we file with the relevant stock exchange regulators and in other public communications of the company.

Messages broadcast 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 broadcasting the messages must be authorised to do so. In our social media guidelines, we provide assistance to employees and make it clear that social media profiles are operated privately and that extending company or brand content via one's own profile is therefore not an expression on behalf of the company.

We do not share information that is classified as restricted or secret. We adhere to the specifications in the Telefónica Business Principles.

### 3.4 Communication via social networks

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

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 in social networks.
- In particular, we do not transmit any messages that are insulting or defamatory towards employees, customers or other groups.
- We also do not transmit content that intimidates, harasses, insults or threatens any person or organisation.
  - o Furthermore, the applicable social media guidelines of Telefónica Deutschland are followed.



### 3.5. Content development

When we produce audiovisual content or make it available to clients, we are guided by the same general principles of legality, integrity and transparency, neutrality and the protection of children.

We refrain from anything that would encourage the consumption of tobacco, alcohol, gambling and junk food.

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 take place in the same way in publicly accessible media.

We promote the values set out in our Principles of Responsible Business, such as diversity, integration of people with all kinds of impairments and the protection of the environment.

### 3.6. Broadcast of third party advertising

We ensure that the third party advertising we broadcast:

- does not contain messages that incite discrimination, hatred, violence or illegal
- illegal behaviour.
- Is appropriate to the age rating of the content to which it relates.
- respects codes of conduct and self-regulation relating to the advertising of particular goods or services.

## 4. Reputation management

When a situation arises that may negatively affect the reputation or image of the company or one of its brands, we follow our crisis management system. The Communication Director (or the person responsible for communication) initiates the process.

When the decision is made to classify a situation as a crisis, a multidisciplinary - according to the communication subject matter - crisis team is convened. The crisis team will:

- Analyse the risk situation and its potential impact.
- 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 as often as the board 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](http://www.telefonica.de) which are available to all stakeholders. Enquiries, 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 [impressum@cc.o2online.de](mailto:impressum@cc.o2online.de). For complaints and notifications of human rights violations, the reporting channel [humanrights-de@telefonica.com](mailto:humanrights-de@telefonica.com) is available. All communications through these channels will be treated in accordance with the principles of respect, confidentiality, reasonableness and completeness. Any 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 contents of this Directive shall ensure that it is properly implemented.

This Directive shall enter into force on the day following its approval.