



Rules of Procedure

Complaints procedure / whistleblower procedure

(hereinafter referred to as the whistleblower procedure)

1. WHAT IS THE WHISTLEBLOWER PROCEDURE?	2
2. HOW ARE INFORMANTS PROTECTED?	2
3. WHO CAN MAKE A REPORT?.....	2
4. WHAT TOPICS DOES THE WHISTLEBLOWER PROCEDURE COVER?.....	3
5. HOW CAN REPORTS BE SUBMITTED?	3
6. CAN REPORTS ALSO BE SUBMITTED ANONYMOUSLY?	4
7. WHAT INFORMATION SHOULD A REPORT CONTAIN?	4
8. WHO IS RESPONSIBLE FOR PROCESSING THE REPORTS RECEIVED?	4
9. WHAT HAPPENS AFTER A REPORT IS SUBMITTED AND HOW QUICKLY ARE REPORTS PROCESSED?.....	5
10. CAN A REPORT ALSO BE SUBMITTED TO EXTERNAL REPORTING OFFICES?	6
ANNEX I.....	8

1. What is the whistleblower procedure?

Responsible, ethical and lawful conduct is of highest priority for the Telefónica Deutschland Group¹ ("Telefónica Deutschland") in its own business activities and in its relationships with its employees, business partners, customers and other stakeholders.

Telefónica Deutschland has established a whistleblowing procedure that allows individuals, companies, and other organisations, such as non-governmental organisations, to report human rights and environment-related risks or violations, as well as violations of applicable law or internal guidelines and business principles.²

2. How are informants protected?

The protection of the informant is paramount in our whistleblower procedure. Discrimination or punishment due to the submission of reports³ will not be tolerated by Telefónica Deutschland.

Telefónica Deutschland ensures that the confidentiality of the identity of the informant and any other persons mentioned in the report is protected and that unauthorized employees do not gain access to this information.

All persons entrusted with processing a report are obliged to maintain confidentiality.

The external ombudsperson is additionally bound by the lawyer's professional duty of confidentiality and only passes on personal data with the informants consent.

All submitted reports are handled in accordance with the data protection regulations.⁴

3. Who can make a report?

The whistleblower procedure is open to anyone who is either directly affected or acts as an informant of an affected person. Informants can be, for example, employees, contractors, direct and indirect suppliers, customers, residents, investors, other companies or non-governmental organisations (NGOs).

The whistleblower procedure is always free to use.

¹ The Telefónica Deutschland Group includes the following relevant companies here: Telefónica Germany GmbH & Co OHG, TGCS Rostock GmbH, TGCS Nürnberg, TGCS Bremen, TGCS Hamburg, Telefónica Germany Business Sales GmbH, Telefónica Germany Retail GmbH, E-Plus Service GmbH, AY YILDIZ Communications, Ortel Mobile GmbH, TCFS Potsdam GmbH; Wayra Deutschland GmbH.

² The procedure covers risks or violations within the meaning of the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz/ LkSG), breaches of applicable law under § 2 of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz/ HinSchG) as well as other legislation and internal guidelines.

³ All reports, complaints, and tips are hereinafter referred to as "reports".

⁴ Data protection information for informants is stored in the data protection information sheet for the whistleblower procedure.

4. What topics does the whistleblower procedure cover?

The whistleblower procedure covers reports on risks and violations related to a variety of topics:

Human Rights and Environment 	Compliance topics 	Not covered by the whistleblower procedure 
<ul style="list-style-type: none">▪ Violations of human rights, e.g., discrimination in the workplace, working conditions in production▪ Violations of environmental obligations by the company, e.g., air and water pollution▪ Violations of the Declaration of Principles on Respecting Human Rights or the Supply Chain Sustainability Policy	<ul style="list-style-type: none">▪ Violations of applicable law within the meaning of § 2 HinSchG and other laws (e.g., bribery, fraud)▪ Violations of internal guidelines and business principles	<ul style="list-style-type: none">▪ Contract terminations▪ Claims▪ Technical problems▪ Customer complaints without human rights relevance
Human Rights mailbox and Ombudsperson	Tell-Us-channel and Ombudsperson	Please contact our customer service.



Please refer to [Annex I](#) for a detailed overview of human rights and environmental issues.

5. How can reports be submitted?

Reports can be submitted via the following channels:

Ombudsperson:

Reports can be submitted to an independent lawyer who acts as an ombudsperson and is not part of Telefónica Deutschland.

The Ombudsperson accepts reports on all topics mentioned in [Chapter 4](#) and forwards them to the responsible internal department.

The external ombudsperson Dr Rainer Buchert can be contacted⁵ via:

- e-mail: dr-buchert@dr-buchert.de
- the [contact form](#)
- telephone: (+49) (0)69 710 33 330 (Monday-Friday, 9am-6pm)
- fax: (+49) (0)69 710 34 44 4
- mail:

*Attorney at Law Dr. Rainer Buchert
Kaiserstraße 22
60311 Frankfurt am Main
Germany*

⁵ Languages in which the ombudsman can be contacted: Bulgarian, Danish, German, English, Finnish, Irish (Gaelic), Italian, Croatian, Dutch, Portuguese, Russian, Serbian, Slovak, Slovenian, Spanish, Flemish, French, Polish, Romanian, Czech, Hungarian

As a lawyer, the ombudsperson is bound by confidentiality.

Further information about the ombudsperson can be found at:

www.telefonica.de/ombudsperson

Human Rights mailbox

Human rights and environment-related reports can be sent directly by e-mail at humanrights-de@telefonica.com to the Human Rights mailbox of Telefónica Deutschland.

Tell-Us-channel

Reports according to the German Whistleblower Protection Act (*HinSchG*) as well as possible compliance violations can be sent directly via e-mail to tell-us@telefonica.com.

6. Can reports also be submitted anonymously?

Reports can also be submitted anonymously by phone or mail. However, in case of an anonymous report, consultations with the informant are not possible. Therefore, it is particularly important that as much information as possible is provided so that the report can be adequately understood and processed.

When submitting the report via the ombudsperson's contact form, the informant can choose whether personal data is passed on to Telefónica Deutschland. In this case, the informant communicates exclusively with the ombudsperson.

Even if a report is not submitted anonymously, the personal data of the informant will be treated confidentially (see also [Chapter 2](#)).

7. What information should a report contain?

To enable proper processing, it is important that reports contain relevant information and descriptions. The following information can be helpful:

- What has happened?
- When or in what period of time did the incident occur?
- Where did the incident occur (e.g. in which country, at which company, at which supplier)?
- Who is involved?
- Which other people are aware of the incident?

8. Who is responsible for processing the reports received?

Telefónica Deutschland ensures that all persons entrusted with the execution of this whistleblowing procedure work independently, are obliged to maintain confidentiality and possess the necessary qualifications.

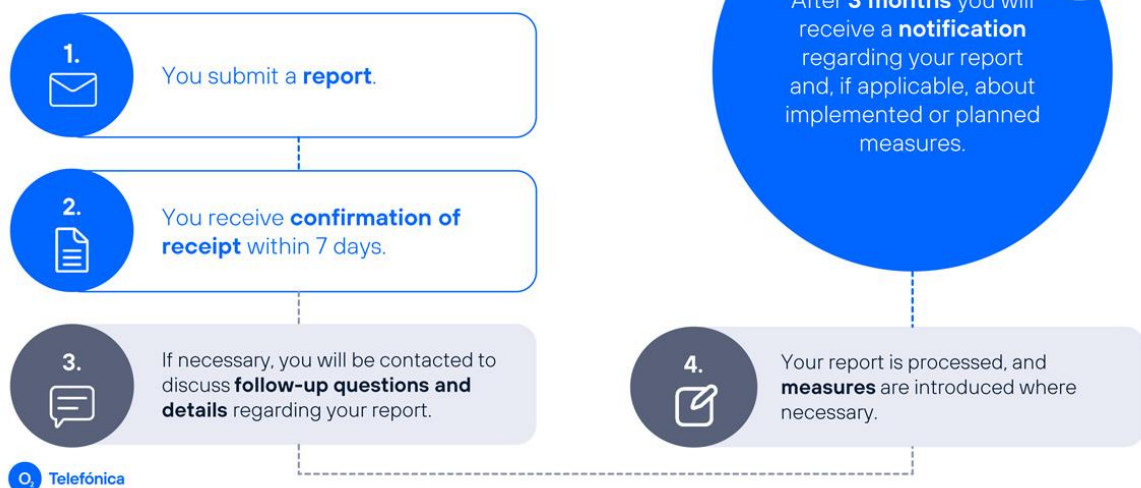
For human rights or environment-related reports, the external ombudsperson and employees from the Corporate Responsibility & Sustainability department who manage the Human Rights mailbox are responsible for an initial assessment of the report and communication with the informant. The cross-departmental Human Rights Committee and the Human Rights Officer of Telefónica Deutschland are responsible for evaluating reports and deriving any necessary measures.

For reports related to the German Whistleblower Protection Act (*HinSchG*) and for compliance-related reports, the external ombudsperson and trained employees from the Compliance department may process the reports and communicate with the informant.

9. What happens after a report is submitted and how quickly are reports processed?

What happens to my report?

The Telefónica Deutschland whistleblower-procedure for human rights and environment-related risks or violations is derived from the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) and the German Whistleblower Protection Act (HinSchG). Detailed information regarding this process can be found in the rules of procedure.



a. Confirmation of receipt of your report

The informant will receive a confirmation of receipt within seven days after submitting the report, if the reporting channel permits.

This excludes customer complaints that are not related to human rights or the environment within the meaning of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) or compliance within the meaning of § 2 of the German Whistleblower Protection Act (*HinSchG*) and other laws.

b. Examination of human rights and environment-related reports

If the report was not submitted anonymously, the informant will be contacted within 14 days of receipt of the report to inquire about further information regarding the report and expectations for possible measures.

The further examination of the report is carried out by the Corporate Responsibility & Sustainability department and the Human Rights Committee, maintaining confidentiality (see [Chapter 2](#) and [Chapter 6](#) for more information on confidentiality and anonymity). Depending on the specific case, other relevant contact persons will also be involved. The informant will be regularly informed about the status of the procedure.

After the examination is completed, an assessment is made as to whether the report concerns a human rights or environmental violation or risk. If this is the case, further relevant internal and external stakeholders (e.g. departments or suppliers) will be involved if necessary to take appropriate preventive or remedial measures.

For a report that falls within the scope of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), the informant generally receives information about the outcome of the procedure within three months of the confirmation of receipt. However, for extensive and/or complex reports, processing may take longer.

If the report is unfounded, Telefónica Deutschland will discontinue the procedure and inform the informant of this decision. A report is unfounded if no risk or violation of human rights or environment-related obligations has been identified, or the report has no connection to Telefónica Deutschland or its business partners. The whistleblower procedure remains available to the informant at all times, even after a procedure has been concluded.

c. Examination of compliance-related reports

If the report was not sent anonymously, the informant can be contacted to discuss the facts of the report in more detail.

Further coordination of the investigation is carried out by the Compliance Department by maintaining confidentiality.

For a report that falls within the scope of the German Whistleblower Protection Act (*HinSchG*), the informant, will receive information on planned or already taken follow-up measures and relevant reasoning within three months of receiving confirmation of receipt if the chosen reporting channel permits it.

10. Can a report also be submitted to external reporting offices?

Informants also have the option of submitting an external report to the relevant federal, state, or European Union bodies, institutions or authorities. In particular, the following may be considered:

- The [complaint procedure](#) for the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) of the Federal Office for Economic Affairs and Export Control (BAFA)
- The [National Contact Point](#) for the OECD Guidelines of the Federal Ministry for Economic Affairs and Energy (BMWE)
- The central external reporting office of the Federal Office of Justice (BfJ)
- The [whistleblower system of](#) the Federal Financial Supervisory Authority (BaFin)
- The [whistleblower system of](#) the Bundeskartellamt (BKartA)

ANNEX I

Overview of human rights and environmental obligations:

