



A1 Telekom Austria Policy on Responsible Mineral Sourcing from Conflict-Affected and High-Risk Areas

The A1 Telekom Austria Group Code of Conduct commits the group together with joining the UN Global Compact to implement fundamental requirements in the areas of human rights, labor, environment, and the fight against corruption. Building on the Group's Environmental Policy, this policy further elaborates on the aspects of responsible mineral sourcing and prevention of mineral sourcing from conflict-affected and high-risk areas.

A1 Group is aware of risks and recognizes the adverse impact on people and the planet that may be associated with extracting, trading, handling, and exporting minerals from conflict-affected and high-risk areas.

A1 Group fully recognizes the recommendations of OECD¹ concerning responsible mining and requests the same from our vendors.

Although A1 Group is not a direct importer, smelter, or exporter of 'conflict minerals' (3TG – tin, tungsten, tantalum, and gold), and cannot be directly associated with responsible mining practices (including of cobalt), we recognize our responsibility upstream, in our value chain. A1 Group also commits to increasing our group circularity efforts and initiatives, in particular activities to support the reuse or recycling of materials. In this way, we work towards reducing the global demand for the use of raw materials, including here the 'conflict minerals' and cobalt.

A1 Group is aware of financial crimes and human rights abuses that may occur in the process of the extraction, transport, or trade of minerals. Moreover, we recognize the potential connection of unethical mineral trade with occurrences of torture or inhuman and degrading treatment, compulsory labor, child labor, sexual violence, war crimes and crimes against humanity, bribery, and corruption.

We request from vendors and partners concerned that they ensure compliance with the principles of responsible and ethical mineral sourcing, outlined in Section 1502 of the US Dodd-Frank act (1997) and EU Conflict Minerals Regulation² (2017) reflected in the Non-financial Reporting Directive (NFR).

¹ <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>

² Conflict Minerals Regulation: [L_2017130EN.01000101.xml \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2017/1303/oj)

A1 Group commits to establishing due diligence processes to eliminate sourcing minerals from conflict or high-risk areas and report transparently on the result of these investigations.

Further, A1 Group commits to not collaborating with vendors who tolerate any kind of abuse associated with the sourcing of 'conflict minerals' and we disassociate ourselves from profiting in any way from the minerals sourced in an unethical way. A1 Group will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses associated with mineral sourcing.

When defining minerals from conflict areas, A1 Group follows the UN and the EU guidance of conflict areas, including, but not limited to D. R. Congo. A1 Group excludes from the definition of 'conflict minerals' the mineral extraction practice, which is appropriately certified by an independent body, vouching for mineral extraction to be free from any kind of financial or human rights abuses.

This policy is valid for the entire A1 Telekom Austria Group and its subsidiaries.

Vienna, May 24, 2023

The Management Board of Telekom Austria AG



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