

The A1 Telekom Austria Group

Human Rights Policy

Preserve & Promote Human Rights



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Foreword

Our A1 Code of Conduct highlights the importance of Human Rights, which we further elaborate in this policy.

In early 2013, the A1 Telekom Austria Group (meaning Telekom Austria AG and its subsidiaries, from here on "A1 Group") became a signatory of the UN Global Compact, underlining its commitment to the ten principles of the Global Compact.

We aim to take this commitment a step further. Thus, this Human Rights Policy aims to provide further details about the commitments, our adherence to international standards and their implementation. Human Rights related commitments are already an integral part of the A1 Group Code of Conduct, but we believe that Human Rights deserve their own policy.

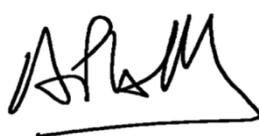
As an internationally operating company, the A1 Group acknowledges its role in preserving and promoting Human Rights for all its employees, customers, business partners and everyone else that our business decisions might affect. For that matter, we consistently strive to promote respect for Human Rights in a manner consistent with our internal policies.

The A1 Group Human Rights policy is a living and ever-evolving document. We constantly keep track of any development regarding changes and acquisition of knowledge around the topic of Human Rights, such as the Corporate Sustainability Due Diligence Directive of the European Commission. Thus, we will update this policy and adapt our related processes according to said standards when needed.

Signed by Group Board



Thomas Arnoldner, CEO



Alejandro Plater, COO



Siegfried Mayrhofer, CFO

1. Scope

This policy applies to all people who work with any of the A1 Group entities, including all countries and the respective subsidiaries, employees, managers and executives and wherever the A1 Group has a controlling interest. Incidents of non-compliance with this policy (or any other principle listed in our A1 Code of Conduct) should be reported to one's direct manager and to Group Compliance.

It is also possible to report an incident online via our whistleblowing report system "[tell.me](#)" – if desired, also anonymously.

Anyone professionally affiliated with any A1 company who violates the principles established in this policy will be subject to adequate consequences, such as disciplinary actions for employees and contractual repercussions for business partners.

2. Human Rights @ A1 Group

The A1 Group is aware of its role in complying with Human Rights. Due to the characteristics of our industry, we see our main areas of responsibility within our role as an **Enabler of Human Rights, Data Privacy, Supply Chain Management** as an **Employer** and, finally, in **M&A**.

2.1. Enabling Human Rights for Society

The A1 Group is a large supplier of telecommunication services in several European countries. As such, we also assume the role as an enabler of digitalization in these countries. In a constantly growing field, digitalization influences more and more areas of human society, including public services, education, job search, acquisition of knowledge and even fostering personal relationships. Our role as an enabler for digitalization contributes to several Human Rights, such as Article 18, Article 19, Article 21 (2), Article 23 and Article 27 (1) of the Universal Declaration on Human Rights (please see Addendum).

The A1 Group is therefore committed to ensure access for all our stakeholders and thus the possibility to participate in digital society. We assume this responsibility knowing its contribution to society as well as its significance to its individuals.

2.2. Data Privacy

In the Code of Conduct, which applies to the entire A1 Group, data protection and information security are a key principle for the actions of employees. The protection of privacy and thus respecting the Human Rights of customers, employees, shareholders, suppliers and sales partners is a guiding principle anchored in the Code of Conduct of the A1 Group. The Group's contractual partners are required to comply with the principles governed by the Code of Conduct of the A1 Group and to respect Human Rights and data protection. The Code of Conduct is an integral component of the relationship with contractual partners.

2.3. Supply Chain Management

The A1 Group is a major provider of telecommunication and internet services in CEE (Central and Eastern Europe). Due to the nature of this industry, we also assume the role of a vendor for technical appliances, such as mobile phones, routers and other supporting devices, namely peripherals. As such, we are also reliant on full compliance to Human Rights best practices of our partners, in all steps along the value chain. We seek to establish business relationships with enterprises that share the same values and respect for Human Rights as the A1 Group. Within our supply chain and network of business partners, we want to promote Human Rights awareness. We are committed to ensuring that our business partners, especially our suppliers and distributors, comply with our Human Rights Policy (as well as our Code of Conduct, DE&I policy and Responsible Sourcing Policy) in relation with their employees, customers and services. This especially, but not exclusively, applies to our commitments...

... against child labor

... against forced labor

... to minimum standards in the area of job safety and health protection

... to guaranteeing appropriate remuneration.

The full list of commitments and standards can be found in the Addendum. In order to ensure our existing suppliers' commitment to our ambition, we assess risks related to environment and Human Rights matters, as well as matters of data privacy and security, and, based on risk classification, we ask our largest suppliers to fill in a self-declaration form to confirm that they are compliant with, inter alia, international Human Rights standards and local regulations. Our expectations towards our suppliers, sub-contractors and sub-suppliers, including the ones related to Human Rights, are communicated in our Group Supplier Code of Conduct (GSCoC).

If we become aware of violations towards our values and expectations regarding Human Rights, we aim to alert our business partners and engage

them in the corrective action plan, encouraging them to resolve these issues. In case of lack of cooperation, or in case the business partner continues or repeats non-compliant activities, we see ourselves entitled to rescind the respective commercial relationship. The results of our annual endeavors with our suppliers shall be reported in our Annual Supply Chain Report.

If our risk assessment identifies our existing business partners as high-risk in terms of ESG, our suppliers as well as their suppliers and subcontractors, may be eligible for on-site audit, which the A1 Group shall administer via JAC (Joint Alliance for CSR), a group of telecom operators interested in improving the conditions in our supply chains. In our sourcing process, we send the self-declaration form to suppliers depending on the risk classification of the respective material group of the product/service to be sourced or the spend before awarding. In case of violations towards our values and expectations regarding environment, Human Rights, data privacy and security, we engage with the supplier to resolve the issue, however, in case of a remaining material non-compliance, we will refrain from entering a business relationship with the respective supplier.

2.4. The A1 Group as an Employer

The A1 Group seeks to ensure that its working conditions comply with internationally recognized labor standards and the laws of the countries where we operate.

In adherence with Article 1 and 2 of the Universal Declaration of Human Rights, as well as the ILOs Declaration on Fundamental Principles and Rights at Work, we promote respect and diversity, equity and inclusion in the workplace and combat discrimination.

For further commitments regarding Diversity, Equity and Inclusion, we refer to our "DE&I Policy", available via the [A1 ESG Download webpage](#).

We are committed to the safety, health and well-being of our employees and strive to further improve our measures to prevent and minimize

occupational risks. This commitment applies to physical as well as mental conditions. We further reference this in our [Health, Safety and Well-being Policy](#).

To maintain a safe work environment, physical violence and threats in the workplace must trigger an immediate response in accordance with established procedures. We do not tolerate any kind of harassment, intimidation, insults, threats, unfair accusations, bullying, sexual harassment, or other acts of physical or psychological violence.

The A1 Group has no ideological or political affiliation. All employees are entitled to exercise their political rights without being pressured by their employer, directly or indirectly, to favor any given political party or candidate. Any such political activity must be undertaken solely on a personal basis, during non-business hours and without making any expressed or implied reference to the A1 Group, and under no circumstances may involve the use of any resources or assets owned by the A1 Group.

At the A1 Group, various measures are implemented to guarantee adherence to Human Rights. Fair Pay and Diversity, Equity and Inclusion are taken care of in separate policies – subsumed in the Diversity, Equity and Inclusion Policy and in the Fair Pay Principles. Additionally, a regular screening of wellbeing of our employees related to job satisfaction, safety at work, adherence to labor law regarding working hours, work environment regarding job climate and interaction with management is conducted. This is performed within an annual employee satisfaction survey. In relation to potential breaches our colleagues may use our whistleblowing platform tell.me. We have staff councils in place who represent employees' positions in relevant topics (e.g., models for work from home). We use the results and insights gained to improve and minimize risks by carrying out due diligence such as engaging with relevant stakeholders and implementing additional measures in case of an observed / reported deviation to our set standards.

2.5. Mergers and Acquisitions (M&A)

In the context of mergers and acquisitions, the A1 Group conducts due diligence also with a focus on compliance of M&A targets related to relevant aspects of Human Rights. This includes assessing the target's risks and impacts related to Human Rights along the whole value chain as well as its compliance with international standards and applicable laws. The diligence further involves evaluating the effectiveness of its Human Rights policies and procedures as well as the target's history of violations to labor law or worker strikes. The outcome of this assessment may influence our valuation and following offers in an acquisition process. Any deviation to our standards would lead to measures taken immediately in case of a successful M&A process, and nevertheless to recommendations to the owners in case of a M&A process without going forward.

3. International Human Rights Standards

3.1. Our Commitment

The A1 Group believes that respect for Human Rights is a key component of corporate social responsibility. As an international enterprise, we acknowledge our role in preserving and fostering Human Rights.

The A1 Group is committed to the following Human Rights standards:

- International Bill of Human Rights, consisting of:
 - The Universal Declaration of Human Rights
 - The International Covenant on Civil Political Rights
 - The International Covenant on Economic, Social and Cultural Rights
- The Declaration on Fundamental Principles and Rights at Work proclaimed by the International Labor Organization
- The United Nations Global Compact
- Guiding Principles on Business and Human Rights

This policy is the manifestation of our commitment to Human Rights. Furthermore, it outlines the most relevant rights which for we consider ourselves especially responsible in contributing to their preservation.

The following section puts emphasis on the concrete Human Rights that can be found in the respective internationally recognized documents. Please find the documents that we refer to in section 3.5.

3.2. United Nations Global Compact (UNGC)

As a signatory of the United Nations Global Compact as of 15th of February 2013, we have already committed to its Ten Principles.

HUMAN RIGHTS: As a general commitment to the Human Rights outlined in the UNGC, the A1 Group aims to protect Human Rights in all subsidiaries, because we consider it as the right thing to do, regardless of possible benefits or detriments that might go along with that commitment. Therefore, we are also eager to reflect upon our own processes constantly in all areas of business to mark possible gaps between this commitment and the status quo.

LABOR: the A1 Group strives to be a fair employer in all its operating companies as well as to create the best possible working conditions for all of our employees. To work towards that goal, we strive to ensure fair wages, safe working conditions, prevent discrimination and enable all employees to exercise their freedom of association.

ENVIRONMENT: the A1 Group actively assumes its environmental responsibility by promoting more efficient, resource-friendly, and thus more sustainable ways of working and living. This strong commitment is also reflected in the A1 Group's ambitious environmental objectives. The A1 Group strives to constantly challenge its ecological impact and to innovate with clear and positive environmental benefits for society and the environment.

ANTI-CORRUPTION: the A1 Group has a regularly updated Code of Conduct and further compliance guidelines in place. In addition to our commitment to Human Rights, it also regulates our expectations and requirements to our business partners as well as employees. It manifests our commitment to combat child exploitation, forced labor and corruption in all its forms, including extortion and bribery.

3.3. Fundamental Principles and Rights at Work

All countries, in which the A1 Group operates, are member states of the International Labor Organization (ILO). As such, they have endorsed the guiding principles set out in its “Declaration on Fundamental Principles and Rights at Work”.

Given our responsibility as an employer, the A1 Group is fully committed to the principles lined out in the aforementioned declaration, including its foundation written down in the Declaration of Philadelphia.

3.4. Universal Declaration of Human Rights

The A1 Group is committed to human rights and thus to contributing to make a positive impact for the environment and society, wherever we operate. As such, respecting, promoting and preserving Human Rights to the extent of our capability is a natural commitment to us. Although we consider all Human Rights as important and paramount for a functional society some of them are more relevant to us due to the nature of our industry.

Therefore, we especially want to underline our commitment to these relevant Human Rights as stated in the Universal Declaration of Human Rights as adopted by the United Nations General Assembly, along with specific statements to each of them:

Ad Article 1& 2; The A1 Group believes in the dignity and capability of each employee and customer, business partner and every other human being alike. Therefore, we are constantly striving towards a more diverse and respectful environment for everyone. We combat discrimination based on disability, ethnic origin, religion, gender, age, marital status, medical condition, sexual orientation or political opinion, or any other factor that may cause people to face discrimination. We have further elaborated our commitment towards Diversity, Equity and Inclusion in our group wide DE&I Policy.

Ad Article 5; As a vendor of technical devices, the A1 Group is aware of several topics related to the involved resources and their extraction, and the respective relevance for Human Rights issues. The A1 Group is committed to ensure, that its processes, and those of its business partners, comply with our commitments towards Human Rights.

Ad Article 18 & 19; As one of the biggest internet and telecommunication providers in Austria and Eastern Europe, the A1 Group acknowledges its role in preserving freedom of expression and opinion wherever it can to the extent of its capability.

Ad Article 21(2) & 27 (1); As an enabler of digitalization and by providing and maintaining high quality internet and telecommunications services, the A1 Group ensures access to public services and enables participation in society as well as access to knowledge around the world for its customers.

Ad Article 23 & 24; the A1 Group strives to be a fair employer. We strive to offer the best possible working conditions for all of our employees.

3.5. Original Documents – Links

[United Nations Global Compact](#)

[Fundamental Principles and Rights at Work](#)

[Universal Declaration of Human Rights](#)

Further; [International Bill of Human Rights](#)

4. Implementation

The A1 Group strives to ensure the group-wide communication of this Human Rights Policy. This way, we want to create awareness about Human Rights for our employees, business partners, suppliers and interested readers alike.

Considering the impacts Human Rights violations can cause, we will prioritize appropriate actions to identify, prevent or mitigate those impacts in our value chains. Whenever we identify flaws in our processes that aim to promote and preserve Human Rights, we will engage in appropriate remediation processes by ourselves or in cooperation with other stakeholders.

Where national law diverges from the A1 Group's commitment to human rights and sets a lower standard, the A1 Group always endeavors to achieve the higher standard, though the wellbeing of employees is the top priority. In the event of a conflict, A1 applies national law, at the same time attempting to respect human rights as much as possible.

This policy outlines our commitment to our responsibility that we adopt towards society and the people that live within. It is our vision to support and foster the freedom of the individual. We believe that human rights are key components for that.

5. Addendum

The following Addendum lines out all Human Rights that were cited in the main part of the policy.

United Nations Global Compact (UNGC)

HUMAN RIGHTS

- Businesses should support and respect the protection of internationally proclaimed human rights.
- Businesses should make sure that they are not complicit in human rights abuses.

LABOR

- Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- The elimination of all forms of forced and compulsory labor;
- The effective abolition of child labor; and
- The elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

- Businesses should support a precautionary approach to environmental challenges;
- undertake initiatives to promote greater environmental responsibility; and
- Encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

- Businesses should work against corruption in all its forms, including extortion and bribery.

Universal Declaration of Human Rights

Article 1: "All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in spirit of brotherhood."

Article 2: Everyone is entitled to all the rights and freedoms set forth in this Declaration without distinction of any kind, such as race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.

Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.

Article 5; No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Article 18; Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.

Article 19; Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.

Article 21, 2: Everyone has the right to equal access to public service in his country.

Article 27, 1: Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits.

Article 23:

1. Everyone has the right to work, to free choice of employment, to just and favorable conditions of work and to protection against unemployment.
2. Everyone, without any discrimination, has the right to equal pay for equal work.
3. Everyone who works has the right to just and favorable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
4. Everyone has the right to form and to join trade unions for the protection of his interests.

Article 24: Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.

Fundamental Principles & Rights at Work (ILO)

Even though we hold all principles laid out in these declarations in high regards, the following principles are especially salient to us and are especially worth mentioning:

Declaration of Philadelphia

- Labor is not a commodity
- Freedom of expression and of association are essential to sustained progress

Declaration on Fundamental Principles and Rights at Work

- Freedom of association and the effective recognition of the right to collective bargaining
- The effective abolition of child labor
- The elimination of discrimination in respect of employment and occupation
- The elimination of all forms of forced or compulsory labor.