



| A¹ Telekom Austria Group

Human Rights Policy

Preserve & Promote Human Rights

Update: August 2025

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Foreword

Our A1 [Code of Conduct](#) highlights the importance of human rights, which we expand upon in this policy.

In early 2013, the A1 Telekom Austria Group (meaning Telekom Austria AG and its subsidiaries, or in short the "A1 Group") became a signatory to the [United Nations Global Compact](#), underlining our commitment to its [Ten Principles](#).

We aim to take this commitment even further. This A1 Human Rights Policy outlines our specific commitments, our adherence to international standards, and how we seek to implement them. While human rights-related principles are already embedded in the A1 Code of Conduct, we believe these rights merit their own dedicated policy.

As an internationally operating company, the A1 Group acknowledges its role in preserving and promoting human rights for all employees, customers, business partners, and others who may be affected by our business activities. We therefore strive to consistently respect and promote human rights in alignment with our internal policies.

The A1 Human Rights Policy is a living and evolving document. We actively monitor developments and emerging knowledge on human rights topics - such as the European Commission's Corporate Sustainability Due Diligence Directive (CSRD).

Accordingly, we will update this policy and adapt our related processes to reflect such standards whenever necessary.

Telekom Austria AG



Alejandro Plater, CEO

August 2025



Thomas Arnoldner, Deputy CEO

1. Governance Framework, Scope, and Incident Reporting

This policy applies to all individuals working with or for any A1 Group entity, including all countries and subsidiaries, as well as employees, managers, and executives, wherever A1 Group holds a controlling interest.

1.1. Incident Reporting Procedures

Internal concerns - incidents involving A1 Group employees, managers, or executives - should be reported to one's direct manager and to A1 Group Compliance. Reports may also be submitted via the Group's whistleblowing platform "[tell.me](#)", which is available to all employees, and may be used anonymously, if desired.

Any individual professionally affiliated with an A1 Group company who violates the principles established in this policy may be subject to appropriate consequences. These may include disciplinary measures for employees - depending on the nature and severity of the violation - and contractual remedies for business partners. Termination of a business relationship will be considered as a last resort, after reasonable measures to prevent or mitigate the violation and preserve the relationship have been taken and found insufficient.

1.2. External Reporting and Human Rights Governance

This policy establishes a dedicated human rights governance structure comprising the Human Rights Officer and the Human Rights Advisory Board.

While all employee-related incidents should follow the procedure outlined above in Section 1.1., the Human Rights Officer serves as the primary point of contact for human rights-related concerns raised by external stakeholders, such as authorities, NGOs, or supplier employees. Such matters from individuals or entities outside the A1 Group may also be reported via the whistleblowing system "[tell.me](#)", which is accessible to both internal and external stakeholders and supports anonymous submissions.

The Human Rights Officer is responsible for engaging with these stakeholders and with the public on human rights issues relevant to A1 Group.

The Human Rights Advisory Board - chaired by the Human Rights Officer - brings together representatives from key departments across A1 Group, including Compliance, Communications, ESG, Human Resources, and Purchasing. The Board supports the Human Rights Officer in identifying and addressing emerging human rights issues and provides a structured forum for stakeholder engagement.

Together, the Human Rights Officer and the Human Rights Advisory Board are responsible for overseeing the communication and implementation of this A1 Human Rights Policy. They meet at least once a year to share information and raise awareness of human rights topics across the relevant departments. Additionally, they convene on an ad hoc basis in response to significant human rights incidents.

2. Human Rights at A1 Group

The A1 Group recognizes its responsibility to uphold human rights. Given the nature of the telecommunications industry, we identify our key areas of responsibility as an employer, within supply chain management, in mergers and acquisitions (M&A), and in data privacy.

2.1. Enabling Human Rights for Society

The A1 Group is a major provider of telecommunications services in several European countries. As such, we also play a key role as an enabler of digitalization in these regions. In this rapidly growing and changing industry, digitalization is increasingly shaping many areas of society, including public services, education, employment opportunities, access to information, and even the development of personal relationships.

Our role in supporting digitalization contributes to the realization of several human rights, including those stipulated in Articles 18, 19, 21 (2), 23, 24 and 27 (1) of the [Universal Declaration on Human Rights](#) (see addendum for details).

The A1 Group is therefore committed to ensuring that all stakeholders have access to digital opportunities, enabling their full participation in the digital society. We recognize this responsibility not only for its broader societal impact but also for its significance in the lives of individuals.

2.2. A1 Group's Responsibilities as an Employer

The A1 Group seeks to ensure that its working conditions, working hours and remuneration as well as other labor related aspects comply with internationally recognized labor standards and the laws of the countries where we operate.

In line 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, diversity, equity and inclusion in the workplace while combating discrimination.

At A1 Group, various measures are implemented to support and promote adherence to human rights. Fair pay and diversity, equity and inclusion are governed by specific policies – namely, our “Diversity, Equity and Inclusion Policy” and the “Fair Pay Principles”. For further details these documents are 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 efforts to prevent and minimize occupational risks. This commitment applies to physical and mental well-being and is supported by our [Health, Safety and Well-being Policy](#).

To maintain a safe work environment, any instance of physical violence or threats in the workplace must trigger an immediate response according to established procedures. We do not tolerate any kind of harassment, intimidation, insults, threats, unfair accusations, bullying, sexual harassment, and any other form 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 conducted solely on a personal basis, during non-business hours, without making any expressed or implied reference to the A1 Group, and must not involve the use of company resources or assets.

Additionally, we regularly assess employee well-being through an annual satisfaction survey, which covers job satisfaction, workplace safety, compliance with labour laws (e.g. working hours), work environment, organizational climate, and interaction with management. The results and insights from this survey are used to improve conditions and minimize risks. Where deviations from our standards are identified, we carry out due diligence—such as engaging relevant stakeholders and implementing additional measures.

Staff councils also represent employees' interests in relevant areas.

In relation to potential breaches our colleagues may use our whistleblowing report system "tell.me" – which can also be used anonymously if desired.

2.3. Human Rights in the Supply Chain

The A1 Group is a major provider of telecommunication and internet services in Central and Eastern Europe (CEE). Given the nature of this industry, we also act as a vendor for technical equipment, such as mobile phones, routers and other supporting devices and peripherals. As such, we depend on the full compliance of our partners with human rights at every stage of the value chain.

We aim to establish business relationships with enterprises that share the A1 Group's values and respect for human rights. Within our supply chain and network of business partners, we actively promote human rights awareness.

We seek to ensure that our business partners, in particular our suppliers and distributors, comply with this Human Rights Policy, as well as our Code of Conduct, [Supplier Code of Conduct](#), Diversity Equity & Inclusion Policy and [Responsible Sourcing Policy](#), in their interaction with their own employees and customers.

This applies especially, though not exclusively, to our commitments to:

- support children's rights and prevent any form of child labour;
- eliminate all forms of modern slavery (including forced labour, human trafficking, and debt bondage);
- ensure at least minimum standards in job safety and health protection;
- provide appropriate remuneration.

The full list of commitments and standards can be found in the addendum.

Due Diligence Process and Self-declaration:

To ensure that our existing suppliers align with our ambitions, we assess risks related to environmental and human rights matters, as well as data privacy and security. Based on this risk classification, significant suppliers are required to complete a self-declaration form confirming their compliance with, *inter alia*, international human rights standards and applicable local regulations.

Suppliers selected for this measure are determined by the risk classification of the relevant material group for the product or service to be sourced, or the associated procurement volume, and impact-based vendor segmentation.

Our expectations towards suppliers, subcontractors and sub-suppliers - including those related to human rights - are outlined in our Supplier Code of Conduct.

Supplier Audits and Corrective Action Plan (CAP):

If our risk assessment identifies an existing business partner as high-risk in terms of ESG, the partners - as well as their suppliers and subcontractors - may be subject to on-site audits. These audits are conducted by A1 Group via the Joint Alliance for CSR1 (JAC), a group of telecom operators committed to improving supply chain conditions.

In the event of violations of our values and expectations regarding environmental protection, human rights, data privacy or security, we engage with the supplier to address and resolve the issue through a Corrective Action Plan (CAP).

If material non-compliance persists, or if the supplier does not demonstrate sufficient cooperation, we may escalate our response - including challenging the business relationship.

Should we become aware of any human rights violations within our value chain, we inform the affected business partners and require them to participate in a CAP process. If the identified issues are not adequately addressed, or if violations continue or recur, we reserve the right to terminate the respective commercial relationship.

2.4. Human Rights in Mergers and Acquisitions (M&A)

In the context of mergers and acquisitions, the A1 Group conducts due diligence also with a focus on compliance with M&A targets related to certain aspects of human rights. This includes assessing the target's human rights risks and impacts across its value chain, and evaluating its compliance with international standards and applicable laws. The due diligence process further involves evaluating the effectiveness of the target's human rights policies and procedures as well as its history of violations of labor law or worker strikes. The outcome of this assessment may influence our valuation and following offers in an acquisition process. Any deviation from our standards would lead to measures being taken

¹ More information about JAC is available at the initiative's web page: <https://jac-initiative.com/>

immediately in case of a successful M&A process. If an M&A process does not materialize, A1 Group will still provide recommendations to the owners where necessary.

2.5. Data Privacy and Human Rights

In the A1 Code of Conduct, which applies across the whole organisation, data protection and information security are key principles guiding the daily actions and behavior of our employees.

Protecting privacy, and thereby respecting the human rights of our customers, employees, shareholders, suppliers, and sales partners, is a core principle reflected in the A1 Code of Conduct.

Our contractual partners are also required to comply with the principles governed by the A1 Code of Conduct and to respect both human rights and data protection. The Code of Conduct is an integral part of the relationship with our contractual partners.

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 upholding the following human rights standards:

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

This policy expresses our commitment to human rights and identifies the rights for which we consider ourselves particularly responsible. The following section highlights specific human rights as defined in internationally recognized documents.

3.2. United Nations Global Compact (UNGC)

As a signatory of the United Nations Global Compact as of February 15, 2013, the A1 Group is committed to its Ten Principles which are organized into four key areas: Human Rights, Labor, Environment, and Anti-Corruption. The following section outlines how we implement these principles across our operations.

Human Rights: In line with the human rights principles of the UNGC, the A1 Group aims to protect human rights across all its subsidiaries. This includes actively opposing all forms

of child exploitation and forced labor. We believe this is the right thing to do, regardless of potential benefits or disadvantages associated with that commitment. To uphold this standard, we continuously review our own processes across all areas of our business to identify and address any gaps between our commitment and current practices (Principles 1 to 2).

Labor: the A1 Group strives to be a fair employer throughout all its operating companies and to create the best possible working conditions for our employees. To achieve this, we strive to ensure fair wages, safe working conditions, prevention of discrimination, and the protection of employees' freedom of association and collective bargaining (Principles 3 to 6).

Environment: the A1 Group actively embraces its environmental responsibility by promoting more efficient, resource-friendly, and more sustainable ways of working and living. This strong commitment is reflected in our ambitious environmental objectives. The A1 Group strives to constantly challenge its ecological impact and seek to innovate with solutions that deliver clear and positive environmental benefits for society and the environment (Principles 7 to 9).

Anti-Corruption: the A1 Group maintains a regularly updated Code of Conduct and related compliance guidelines. In addition to our commitment to human rights, these frameworks define our expectations and requirements for both business partners as well as employees. They reflect our commitment to combatting corruption in all its forms, including extortion and bribery (Principle 10).

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) and have endorsed the guiding principles set out in its "Declaration on Fundamental Principles and Rights at Work".

As employer, the A1 Group is fully committed to these principles, including their foundations as established in the [Declaration of Philadelphia](#).

3.4. Universal Declaration of Human Rights

The A1 Group is committed to human rights and contributing positively to the environment and society wherever we operate. Respecting, promoting and preserving human rights to the best of our capability is a natural commitment for us. While we consider all human rights essential and fundamental to a functioning society, certain rights are especially relevant to us given the nature of our industry.

Therefore, we particularly wish to highlight our commitment to these relevant human rights as stated in the Universal Declaration of Human Rights, adopted by the United Nations General Assembly, along with specific statements on how we support 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. Our commitment to diversity, equity and inclusion is further detailed in our group wide Diversity, Equity and Inclusion Policy.

Ad Article 5: As a vendor of technical devices, the A1 Group is aware of environmental concerns related to natural resources, 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.

In this respect we seek to uphold our commitment to respecting the right of freedom of speech, promoting an open access to the internet, and take all steps necessary so that our users can freely:

- express their opinions or ideas;
- communicate with people, organizations or entities;
- access any content, application or service on the Internet; and
- create and disseminate information and content through our networks or services.

At the same time, we comply with applicable legal obligations. Where legal requirements apply to specific events or circumstances, we act in accordance with the rule of law, carefully assess official requests, and strive to maintain transparency wherever possible.

Ad Article 21(2) & 27(1): As an enabler of digitalization, the A1 Group provides and maintains high-quality internet and telecommunications services, ensuring access to public services, enabling social participation, and facilitating access to information and knowledge 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 our employees.

4. Implementation

The A1 Group is committed to ensuring group-wide communication and implementation of this Human Rights Policy. In doing so, we aim to actively raise awareness about human rights among our employees, business partners, suppliers and interested readers alike. The Human Rights Officer and Human Rights Advisory Board are responsible for overseeing this communication effort. They ensure that the policy is effectively made available across all levels of the organization and among external stakeholders.

Considering the impacts human rights violations can cause, we will prioritize appropriate actions to identify, prevent or mitigate potential or actual negative impacts on human rights in our value chains. Whenever we identify shortcomings in our processes, which 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, while ensuring the wellbeing of our employees remains a top priority. In the event of a conflict, we apply national law while striving to respect human rights to the greatest extent possible.

This policy reflects our commitment to the responsibilities we uphold toward society and its members. Our vision is to support and promote individual freedom, grounded in the belief that human rights are essential to achieving that goal.

5. Addendum

The following addendum outlines the human rights and corporate due diligence frameworks referenced in this policy.

United Nations Global Compact (UNGC)- The Ten Principles

Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.
- Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

Labour

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: The elimination of all forms of forced and compulsory labor;
- Principle 5: The effective abolition of child labor; and
- Principle 6: The elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption:

- Principle 10: 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 (because 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 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.

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

Salient ILO Principles and Declarations 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.