



# A1 Stakeholder Engagement Guideline

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Guideline for navigating coherent, group-wide stakeholder relationships.

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### About the Document

A1 Telekom Austria Group, herein further the 'A1 Group', recognises the critical importance of engaging with its stakeholders to build trust, foster transparency, and drive sustainable business practices.

This Stakeholder Engagement Guideline is aligned with the **AA1000 SES 2015** standard and establishes the principles and guidelines that guide our interactions with stakeholders. The company commits to Accountability Principles as defined by this standard.

This Guideline applies to the entirety of the A1 Group and its subsidiaries.

### Change Log

Version	Change	Author		Date
01.0	Release	Content	Jana Kovandzic Pataky	29.05.2024
02.0	Update of tell.me link	Review	Anna Schwarzbauer	23.12.2025
		Approval	Raffaella Ortner Renate Legény	

### Document Updates

This document is to be updated on an annual basis. This version of this document has been released on December 23, 2025.

## 1. Purpose & Objective of Stakeholder Engagement

The purpose of Stakeholder Engagement, defined by this Guideline, is to:

- Clearly articulate A1 Group's commitment to stakeholder engagement.
- Provide a framework for identifying, prioritising, and engaging with stakeholders.
- Ensure the integration of stakeholder perspectives into decision-making processes.
- Enhance transparency and accountability in all stakeholder interactions.
- Connection stakeholder engagement process to the A1 Group strategy, mission, and vision.

In practice, the main purpose of this Guideline and thus of the Stakeholder Engagement process is to provide the framework for the business on how to identify, prevent and mitigate potential and actual negative impacts on the environment and society and to identify risks and opportunities.,

The Guideline is aligned with business standards, such as the **UN Global Compact (UNGC)**, the **UN Guiding Principles on Business and Human Rights**, and the **OECD Guidelines for multinational enterprises**, the **Global Reporting Initiative (GRI)**, but also our commitments arising from the **1.5C Paris Agreement**.

The Guideline is fundamental in supporting the implementation of double materiality and thus the key element and essential for compliance with the relevant legislation, such as the EU's **Corporate Sustainability Reporting Directive (CSRD)** and the upcoming **Corporate Sustainability Due Diligence Directive (CSDDD)**.

The Guideline supports our ESG governance process, ensuring ongoing sustainability transformation and the company's sustainable performance.

## 2. Principles

### Inclusivity

The A1 Group is committed to engaging with a diverse range of stakeholders representing different perspectives and interests. Inclusivity ensures that the voices of all relevant stakeholders are considered in decision-making processes. Inclusivity ensures that all stakeholders have the right to ask the relevant people at the A1 Group relevant questions in direct or virtual meetings.

### Materiality

If the issue is defined as a material, as defined by the CSRD, the company is committed to feeding these topics into the decision-making process.

## **Responsiveness**

We commit to being responsive to stakeholder concerns and feedback. The A1 Group will strive to address stakeholder expectations promptly and meaningfully, fostering a culture of continuous improvement.

## **Accountability**

In addition, the A1 Group acknowledges its responsibility to be accountable for the impacts of its operations on stakeholders. This includes communicating transparently about our performance, seeking input on relevant issues, and taking appropriate actions to address stakeholder concerns.

Based on the above principles, the A1 Group shall integrate stakeholder engagement into:

- Governance, structure, and relevant decision-making processes.
- Relevant policies and/or processes for strategy development.
- Operational management and systems.

## **3. Ownership and Responsibility**

The ultimate responsibility and leadership concerning stakeholder engagement is vested upon the **Head of ESG**, who reports to the Group Deputy CEO. The Head of ESG is responsible for leading and reporting on stakeholder engagement. At least twice a year, the Head of ESG shall inform the Management Board and the Board of Directors of the state of stakeholder engagement. The bi-annual feedback loop ensures that the questions raised can be addressed and actioned within a year.

The responsibility for individual stakeholder groups, engagement with them, communication, and frequency and intensity of these relationships are part of the departments/stakeholder group owners listed in the Table in [Appendix I](#), deemed the most competent within the organisation to manage these relationships or are already in regular interaction with a specific stakeholder group due to the nature of their activities.

The owners shall establish and follow internal methodologies to further systematically identify the relevant stakeholders to engage with based on the purpose and scope of their engagement. The owners shall identify methods of engagement and appropriate levels of engagement (ways of communication) with each relevant stakeholder group. The responsible departments are shown in [Appendix I](#) of this document and shall be periodically reviewed and updated. The relationship with the individual stakeholder groups, as well as the level and method of engagement, are described in Section 4 of this document. The owners shall regularly inform the Head of ESG of the engagement plans, progress, and challenges, in the process of the Quarterly ESG Steering and at least annually submit a report through the appropriate internal communication channels.

## 4. Stakeholder Identification and Prioritization

The A1 Group will identify and prioritise stakeholders based on their potential impact on, or interest in, our operations. The impact/interest assessment of stakeholders (on group and local levels) is an ongoing process, ensuring that we engage with those who can contribute valuable insights and are affected by our activities. The identification of key stakeholders happens in consultation with the specialist departments involved and the results of materiality analysis.

The **CSRD** requires companies to ensure relevant stakeholders are consulted in the process of defining and understanding company material topics through the application of double materiality. The **double materiality** analyses both the impacts of A1 Group activities on people and the environment, but also on how sustainability matters affect the Group (Risks/Opportunities). More details on double materiality are given in [Chapter 5.1 \(Double Materiality Assessment\)](#).

### 4.1 Stakeholder Groups

In the following chapter, we have defined the main stakeholder groups that are managed both on the Group and on the individual OpCo (local) levels. We are committed, wherever appropriate, to consult the local stakeholders which is enabled by detailed reviews of stakeholder groups, as described below.

#### Employees

As a stakeholder group, we recognise **Current Employees** and **Future/Potential Employees**. The communication with our Employees is intense and versatile – aiming to **inform** and **involve** our employees in company activities, and includes communication via the Workplace, intranet, email, SharePoint, face-to-face meetings, employee surveys and events (such as the Women @A1 festival). With future/potential employees, communication is mostly unilateral, via career fairs, employer rating platforms, career websites, job portals or conferences. The **Group HR** is lead on employee relations, with a clear focus on maintaining an image of a good employer, positioning A1 as an employer of choice, and ensuring thus talent attraction and retention. Local HR maintain the relationship on a local level, governed by the group strategy and ensures to regularly convey the views and interests of employees in respective OpCos to the group.

#### Works council

The stakeholder group includes **the Local Workers Council** and **the European Works Councils (EWC)**. Responsible people for the local workers' council are A1 employees, who are **elected members of each respective OpCo**, and are also elected members of the EWC. Internally, the responsibility for the relationship with the workers' council is maintained by the HR department. The relationship with the A1 Group is bilateral, both bottom-up and top-down. Common communication methods include e-mails, MS Teams calls and video conferences, as well as personal discussions with the Group Management Board (MB), where the communication is more intense on the local than on the group level. The workers' council is represented in SVB of the A1 Group and discusses the future strategy and contributes to the design of the

strategy/mission/vision of the group. The workers' council **negotiates** with the MB on behalf of the employees and is **empowered** to play a role in shaping the group agenda.

## Customers

The customers are the core and foundation of our business and a crucial part of our company's success. We split the stakeholder group customers into **B2C** and **B2B** groups, where the B2B group can further be split into **B2B Large Enterprise (LE) & Public Sector and Healthcare (PSHC)** and **B2B Medium Enterprises and Small Business Sales (SME)**. The overall responsibility for the B2B relationship is entrusted to the **Business Unit Enterprise division** (represented on a local level), while the responsibility for the B2C relationship sits within the **Business Transformation and Acceleration unit**. In both cases, initial ownership and contact as well as the first line of communication is entrusted to the **Sales**. The B2X communication is mostly unilateral and **informative**, driven by customer requests, and includes emails, contact forms, and deep dive calls. However, there are other means of communication, such as exchanges or B2C events that might take place with local A1 divisions.

## Financial Community

By Financial Community we mean **informative** relationships with Investors, such as **Institutional and Retail Investors**, but also **Analysts and Financial Media**. The relationship between the Financial Community and the A1 Group is vested in the Group **Investor Relations department**, where the interaction includes publications and information sharing via website, emails, calls, roadshows, in-person meetings and video calls.

## Suppliers

The suppliers/vendors are our business partners, who are an important part of our business success. The vendors can be roughly split into **Strategic vendors**, **Medium** and **Small vendors**. Distributors are included in this general grouping. Responsible for the supplier relationship is **Purchasing Department** (Group and OpCo), however, business units in the group and in OpCos maintain direct contact with vendors and have an independent relationship. Relationship with suppliers is described in detail in the [Group Policy on Responsible Sourcing](#). Relationship with suppliers is a limited two-way engagement, i.e. **negotiations**, but also **informative**. The relationship is maintained through calls, and emails, as well as personal meetings and events.

## Workers in the Value Chain

Workers in the Value Chain are a special interest group, where A1 has **indirect** involvement and is mostly **passive**. We advocate for the well-being of this group, alone and within industry associations, such as JAC. We **audit** the premises of high-risk factories, which includes the workers' interviews. All concerns are mapped in the Corrective Action Plan (CAP) and A1 Group works on their resolution, in favour of the workers. We encourage workers in the value chain to voice their concerns via the A1 Group website ([tell.me](#) platform - also mentioned within this communication). The responsible for the relationship with this group is **the Head of Compliance**.



## Media

Under the stakeholder group Media, we assume the ongoing communication with the Journalists, such as **Editors-in-Chief** and **Content writers**, as well as the relationship with **Publishers** and publishing houses. The **Corporate Communications department** holistically maintains the relationship. The interaction with this stakeholder is **informative** and includes press conferences, personal meetings, one-on-ones, visits, calls and video calls as well as events & spotlight events.

## Industry and Business Associations

Relationships with **Industry associations**, such as GSMA, JAC, ETIS or NGMS, and **Business Associations** such as AmCham, are part of the Group's business interactions. Responsibility for these relationships is placed with the **Group Director for Regulatory, European and Public Affairs**, but also partly with the **Group Head of ESG**. The engagement with this stakeholder is mostly **collaborative**, with Industry associations, where A1 participates in multi-stakeholder initiatives, collaborative programs and projects; and **informative** with Business associations, including conferences, and presentations.

## Politicians & Authorities

The relationship with this stakeholder group is vested with the **Group Director for Regulatory, European and Public Affairs**. The main means of contact are in-person meetings, such as events, stakeholder round tables and in-person meetings, but include also calls, emails and other means of daily communication – thus of an **informative** and **consultative** nature, where the group also **advocates** alone, or within the industry, position over topics of interest. This group includes all affected/local markets the Group operates in.

### Intergovernmental Organisations (IGOs)

**IGOs**, such as the United Nations Global Compact (UN GC) are an important stakeholder to the A1 Group and, the Group is, through various initiatives committed to the goals expressed by UNGC. These are mostly bilateral relationships, in which IGOs have an intrinsic interest in private sector organizations, through **monitoring** of business performance in terms of ESG. On the business side, the A1 Group looks to be aligned with the most important IGOs and their standards. The main responsible for the relationship is the **Group Head of ESG**. Communication consists of reporting, events, initiatives, and seminars and is of **informative** and **collaborative**.

## Local Community

All aforementioned stakeholders include the involvement of local groups and voices as appropriate. We have, however, separated the Local Community as a special stakeholder group in 3 special interest topics: 1) **Infrastructure, H&S and EMF**; 2) **Digital awareness, training & education**; 3) **Environmental and social care and community wellbeing**. The views of these 3 subgroups are regularly considered in our process.

On the topics of Infrastructure, Health, Safety and EMF, our engagement is of an **informative** type and initiated upon the request of customers/communities, where this individual stakeholder (sometimes also a group) often shares their views through letters, protests and media, and A1 actively approaches each

concern, individually or through industry associations, such as FMK (Forum MobilKommunikation). The relationship is vested in the **EMF department** with the support of Media and Regulatory Affairs.

When it comes to A1 and its relationship to the digital divide, we provide training and workshops to targeted groups (children, youth and educators, women, and senior citizens) in an **informative** way, **collaborating** with accredited partners. Typically, the local ESG staff governs the relationship with these groups.

Care for the environmental and social well-being of the communities we operate in is important for A1 Group and is managed through the marketing and communication teams, in regular communication with the **Head of ESG**. The representatives of this group are usually the Non-governmental Organisations (NGOs). This relationship is mostly of an **informative** type.

## 4.2 Stakeholder Matrix

To identify relevant stakeholders and understand how to engage with each relevant group, we have developed and used an internal **Interest/Influence Matrix**. The main components of the interest pillar are interest, tensions, and diverse perspectives of stakeholders. The main attributes of the influence pillar are influence, dependency, and responsibility. Based on the results of the matrix, we have then classified the stakeholders based on the relevant and most applicable communications strategy/engagement level and thus relevant engagement model: **inform**, **consult**, and **collaborate**.

## 5. Engagement Process

The A1 Group works actively and cooperatively with a wide range of stakeholders. The most relevant stakeholder groups are identified in [Appendix I](#).

Stakeholder engagement will be conducted through various channels, such as surveys, consultations, partnerships, and dialogue sessions. We will tailor engagement approaches based on the nature of the stakeholder and the issues at hand.

Deciding on the method of engagement starts with the analysis of the stakeholder group. In some instances, the engagement will be done through group-wide activities. In other cases, local operations might lead, while in other instances, the business units take on the responsibility and lead the engagement.

When deciding on the engagement timeframe, the responsible shall consider the overall goals of certain types of engagement.

We allow the possibility for the scope of the engagement to be redefined during the stakeholder engagement process.

In the process of engaging our stakeholders, we shall ensure two-way communication between the company and stakeholders.

## 5.1. Double Materiality Assessment

The results of the stakeholder engagement help inform our business and are the foundation for our double materiality assessment, based on the aforementioned principles of double materiality. In addition, the outcomes of the assessment are the basis for the sustainability statements according to CSRD. Furthermore, they serve as the foundation for shaping our ESG strategy, defining KPIs, metrics, targets, and stakeholder engagement.

The double materiality assessment is conducted on a group level every two to three years, with an annual review to ensure the consideration of emerging issues and trends. This process is overseen by Group ESG and Group Risk Management. In the course of workshops, topics – predefined by the CSRD as well as entity-specific topics - are assessed on a group level mainly by internal stakeholders.

Internal stakeholders are selected based on their experience on the topic and/or their knowledge about issues raised by external stakeholders.

In instances where limited internal expertise exists on a particular topic, but also where we seek to include new and fresh perspectives, the A1 Group shall conduct external expert interviews.

## 5.2 Grievance Mechanism and Complaints

As a grievance mechanism, and in case the local stakeholders are unable to reach out and voice their views through local communication channels, the A1 Group has a dedicated email address where all questions raised shall be addressed. By using the [ESG@A1.group](mailto:ESG@A1.group), we ensure our stakeholders have the means to reach us. This email address shall be made publicly available to all stakeholders on the A1 Group page and in communication materials.

We also encourage all complaints to be raised via the whistleblowing portal ([tell.me](#)), which guarantees full anonymity to the user.

A special email address is dedicated to questions regarding the health & safety of our local communities, in the context of EMF: [EMF@a1.at](mailto:EMF@a1.at).

## 6. Integration into Decision-Making

All decisions that the A1 Group shall make will take the stakeholder perspectives and interests into consideration. This integration will contribute to more informed and sustainable decisions aligned with the expectations of our stakeholders.

Feedback from stakeholders will enhance our engagement processes and ensure alignment with evolving stakeholder expectations. Any specific improvements identified shall be discussed and acted upon.

## **7. Monitoring and Reporting**

The A1 Group shall regularly and systematically monitor the effectiveness of our stakeholder engagement efforts. The owners of engagement shall evaluate the quality of individual engagements and feedback to the Group. As a Group, we will evaluate the overall quality of the stakeholder engagement. We shall monitor and evaluate commitment, purpose, scoping, and stakeholder participation. We are committed to continually improving our stakeholder engagement practices, and reporting publicly on engagement and outcomes.

We will also report on major concerns mapped during the stakeholder engagement process and respond with relevant A1 Group strategy addressing the key concerns. We shall, on an annual basis, report on a number of grievances we received relevant to our stakeholders and thus related engagement.

## **8. Review**

This Guideline will be reviewed periodically to ensure its continued relevance and effectiveness. Revisions will be made as necessary to reflect changes in stakeholder expectations, business operations, and regulatory requirements.

## **9. Lessons Learned & Forward-looking**

If appropriate, the group might consider qualitative and quantitative KPIs to support supplier engagement and provide relevant measuring of supplier relationships.

## Appendix I : Stakeholder Engagement – Business Unit Mapping

Stakeholder Group	Leading Department
Customers	BUE, Sales, Business Transformation & Acceleration
Employees	HR
Media	Corp Com
Politicians & Authorities	International Affairs & Regulation
	ESG
Financial Community	IR
Suppliers	Procurement
Industry and Business Associations	International Affairs & Regulation
Local Community	Digital Education Initiative
Works council	HR, Works Council
Workers in the value chain	Compliance, Risk