


Member of  Group



GROUP OF COMPANIES

The background of the entire page is a blurred photograph of a busy, modern interior space, likely a corporate lobby or office hallway. The walls are made of large, light-colored square tiles, and the floor is a polished, reflective material. Several people are captured in motion, their figures blurred to convey a sense of activity and movement. The lighting is bright and even. A large, curved blue graphic element is overlaid on the right side and bottom of the page, framing the text.

Code of Human Rights

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“Acting responsibly” is an integral part of our corporate strategy and therefore a requirement for all employees in our Group

1. Scope

“Acting responsibly” is an integral part of our corporate strategy and therefore a requirement for all employees in our Group. Our core business is all about connecting people, and we are confident that every connection we make is an opportunity for sustainable development. For more than two decades, environmental and social responsibility have been essential aspects of our day-to-day business and integral to our corporate governance. Our core company processes are consistently geared toward sustainability.

With this Code of Human Rights, OTE Group undertakes to respect and promote human rights and environmental concerns.

This Code of Human Rights is also a component of the policy statement on its human rights to be issued by company management.

2. Area of Application

The Code of Human Rights applies to the affiliated companies of OTE Group provided that the respective management body has passed a resolution, or the responsible member of management has taken a decision on the validity.

The management of each company is responsible for compliance with this code. No individual or third-party rights may be derived from this Code of Human Rights.

3. Access Rights

This Code is uploaded to Process web and can be accessed by all employees of the Company via a contract of employment or seconded or via any other type of relationship. This Code of Human Rights is also available to the public.

4. Our commitment to respecting human rights and environmental concerns

This is our commitment to respecting and promoting human rights and environmental concerns everywhere we operate, including our supply chain and business partners:

OTE Group takes all internationally recognized human rights and environmental concerns seriously and acknowledges its corporate responsibility as a leading Group, offering telecommunications and technology solutions. The success of our company is built on our high-quality standards, our integrity, and our values. We ensure that we always respect human rights and environmental concerns by implementing Group-wide due diligence processes, which we systematically refine.

Alongside the legal requirements, we are committed to observing numerous international human rights and environment-related reference tools. These are currently:

- **“International Bill of Human Rights“**, consisting of the „Universal Declaration of Human Rights“, „ International Covenant on Civil and Political Rights“ within which the civil, political, and social rights that everyone is entitled to are set out.
- **“International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work”** defining its five basic principles, namely freedom of association and the effective recognition of the right to collective bargaining, elimination of all forms of forced or compulsory labour, effective abolition of child labour, elimination of discrimination in respect of employment and occupation and a safe and healthy working environment.
- **“OECD Guidelines for Multinational Enterprises“** of the Organization for Economic Co-operation and Development

- Principles of **UN Global Compact**.
- **Tripartite declaration of principles concerning multinational enterprises and social policy (MNE Declaration)**.
- United Nations Guiding Principles on Business and Human Rights.

5. Our human rights and environment-related principles and expectations

The human rights and environment-related principles detailed below provide the **basis for all of our business activities**. They apply in equal measure to **our employees** and to our **suppliers and business partners**. They outline our values and standards, which are **set forth in greater detail in our internal Group Policies**, procedural instructions and process and thus creating our framework for action.

5.1 Our principles and expectations regarding our employees

We entrench internal regulations and processes aimed at promoting respect for employee rights. These include, in particular:

Prohibition of child labor

We respect the rights of the child. We forbid the use of child labor. All employer practices are, as a minimum, to be aligned with the current version of ILO conventions no. 138 and 182 and are to ensure that all employees have reached the legal minimum age in accordance with relevant national regulations.

Prohibition of forced labor and all forms of slavery

We are expressly committed to the prohibition of all forms of forced or compulsory labor and all forms of slavery, including modern slavery and trafficking in human beings. All employer practices are, as a minimum, to be aligned with the current version of the ILO core labor standards.

Occupational safety and health protection at work

As an employer, we provide occupational safety and health protection at work for our employees that is at least compliant with applicable law, and we support ongoing developments aimed at improving the world of work. This includes the implementation of appropriate work organization to prevent excessive physical and mental fatigue in terms of working hours and rest breaks. We comply with the regulations on occupational safety when using employees from contractor firms.

Freedom of association and the right to collective bargaining

We recognize the fundamental **rights of association and to collective bargaining**, as well as the right to strike within the framework of national regulations and existing agreements. In addition, we are committed to **cooperating with legitimate, democratically elected employee representatives in an open and trusting manner** based on constructive social dialog, with the aim of achieving a fair balance of interests. We will not prevent our employees from or restrict them in exercising these rights. We do not accept or tolerate the threat of reprisals against employees making use of their right to self-organization.

Prohibition of unequal treatment in employment

We defend equal opportunities and freedom from discrimination throughout the seven dimensions of diversity: **1. Age, 2 Gender and gender identity, 3. Ethnic background and nationality, 4. Sexual orientation, 5. Mental and physical abilities/status, 6. Religion**

The human rights and environment-related principles provide the basis for all of our business activities.

and world view, and 7. Social background (education and financial situation of the family of origin).

With regard to these dimensions, we continually work in support of the removal of systemic barriers to inclusion (e.g., in our buildings and IT systems).

The internationally applicable basis for cooperation in the OTE Group is formed by our **“Guiding Principles”** and our **“Code of Conduct”**. To further strengthen this basis, we have anchored the issues of **diversity, equity, and inclusion** in our policy of the same name, the **“OTE Group DE&I Policy”** as well as in our **“Leadership Anchors”** which are the OTE Group’s leadership behavioral guidelines.

Adequate living wage

We respect the right to a fair and appropriate contractual remuneration that reflects the legal minimum wage on the national labor market and that, at the very least, provides our employees with a decent standard of living livelihood in terms of the international reference tools mentioned above in section 4.

Zero-tolerance approach to violence or harassment of any sort

OTE Group has **zero tolerance for physical, psychological or sexual violence, the threat of this, or any other type of harassment**. This also applies in relation to the **commissioning or use of private or public security forces** to protect a business project if, due to a lack of instruction or control, the use of security forces could lead to a violation of this basic principle. To further strengthen this basis, we have anchored the issues of harassment, sexual harassment and violence in our **OTE Group Policy on the Prevention and Combating Violence and Harassment in the Workplace** and our **“Policy on Avoiding Sexual Harassment within OTE Group”**

Training

The **digital world of work** is becoming more complex and diverse, and it calls for a great deal of flexibility. We support upskilling and reskilling in the interests of both our employees and the company, in order to

ensure consistently high standards of performance and a high quality of service. The learning formats we offer focus in particular on forward-looking **future topics** that address the **increasingly digitalized world of work and the workplace challenges and technological, environmental and social change that this brings with it**. We use **digital learning formats that provide the best possible environment for independent, flexible learning tailored to the employee’s needs**.

5.2 Our principles and expectations regarding our customers

Data protection

Protecting the personal data of all those who are connected with the OTE Group is a key objective for us. We ensure the lawful processing of personal data, considering the fundamental human rights. We are committed to the fundamental right to data protection and informational self-determination valid in the EU and promote its global recognition. We continually enhance technical standards and promote maximum **transparency**. To achieve this, we have comprehensively anchored data protection measures and regulations throughout the Group’s processes. This also includes the data-protection-compliant determination and consideration of **human rights aspects in the development and use of artificial intelligence (AI) or other algorithm-based applications**.

At the same time, we work to ensure that **every individual retains control over the use of their data**. This includes providing information on how data-driven business models work and how, for example, our customers can exert **digital sovereignty**.

We support upskilling and reskilling in the interests of both our employees and the company

We have introduced a range of internal policies to ensure a uniform high standard of data protection in the Group. Of these, the “**Binding Corporate Rules Privacy**” are the Group-wide data protection regulations to which the companies of OTE Group have committed themselves - as far as legally possible.

Freedom of expression and information

We respect freedom of expression and protect it so that we can prevent or minimize the effects, for example, of potential state restrictions. These restrictions must comply with national and/or international provisions and legislation and must be necessary and appropriate for achieving the desired objective, for example, national security or the protection of children.

Protection of children and young people

We protect children and young people

when they are using digital media and take the relevant criteria for the protection of children and young people into account when developing our products and services.

5.3 Our principles and expectations regarding society and our commitment to environmental protection

Compliance and combating corruption

Our compliance culture is a key component of **corporate governance based on integrity and respect**. As a Group, we are committed to complying with ethical principles and both legal and statutory requirements. We have anchored this pledge in our “**Guiding Principles**” and our “**Code of Conduct**”. Corruption violates national and international law. We reject all forms of corruption - both bribery as active corruption and venality as passive corruption - in the public and private sectors. Any form of corruption as well as actions that could be construed as such are to be refrained from.



Digital responsibility and participation

We strive always to protect and respect human rights in regard to the responsibilities that emerge as a result of technological change and the digital transformation. Our objective is for our **technology to be implemented on the basis of humanist values**. We are determined to contribute to shaping a digital society that is based on our fundamental democratic values and in which all people can participate safely, competently, and with autonomy: We want to make the digital world a tolerant, safe space for everyone and enable society to bridge the digital divide.

The rights of local communities and the ability to maintain a livelihood

We respect and protect the rights of **local communities, for example, indigenous peoples**. Where our activities could affect the people in local communities, we make every effort to avoid negative impacts on human rights. We **actively consult** with the communities that are potentially affected, to achieve agreement or consent.

When we acquire, build on or otherwise use land, forests or waters, the use of which secures the livelihood of a person, we are committed to **implementing** the prohibition of unlawful eviction and taking of land, forests and waters.

Mobile communications and health

Electromagnetic fields are a key component of our connected world. We ensure compliance with the relevant statutory thresholds, based on the recommendations of the International Commission on Radiological Protection. The guidelines we have published on the topic of **high-frequency electromagnetic fields (EMF)** provide additional information, outline our approach, and are complemented with an annual report on the topic.

Environmental protection

We are dedicated to environmental protection and contribute in particular



to helping mitigate climate change and achieving compliance with the Paris Climate Agreement. **Environmental risk assessments are an integral component of our environment-related due diligence processes**, including during mergers and acquisitions. These assessments include **all environmental issues** on which our business activities may have a negative impact, **including e.g. actions causing harmful soil changes, water or air pollution, harmful noise emission, or excessive water consumption, or deforestation and loss of biodiversity** which may significantly impair the health and/or the natural bases for livelihood of a person.

We avoid waste as far as possible, and **promote continued use and reuse** and - where this is not possible - the **priority recycling of waste**.

Within our global supply chain, we pay regard to the prohibited production and/or use of materials covered by the **Stockholm Convention (persistent organic pollutants – POPs)**, the non-environmentally appropriate handling of waste containing POPs, and the

improper shipment of **hazardous waste within the meaning of the Basel Convention**. Under the **Minamata Convention**, the production, use/application and/or disposal of mercury and mercury-containing wastes is regulated. In order to avoid environmental risks linked to our business activities in this regard, we take this into account in our due diligence processes.

Our **integrated climate strategy** is based on four pillars: Emissions from the value chain; renewable energy; energy efficiency; and enablement. We set objectives and report on them. We have an OTE Group **environmental management system**, which provides the basis for anchoring environmental due diligence.

5.4 Our principles and expectations regarding our suppliers

We expect, in particular, the following obligations from direct suppliers with whom we have a contractual relationship, and we

put appropriate measures in place to ensure that these obligations are met:

- **For many years**, we have expected our suppliers also to commit to respecting human rights and environmental concerns, and to **observe our principles on these matters (sections 5.1–5.3)**, to **undertake to establish appropriate due diligence processes based on risk**, and to pass on these expectations to their own suppliers.
- We establish review processes- if required together with the suppliers - that enable compliance with these expectations.
- We work in particular to ensure **responsible procurement of raw materials** throughout our supply chain, and therefore require **compliance with standards on the handling of metals, especially conflict minerals**. Beyond that, we support, in particular, initiatives aimed at creating a **global system for monitoring the origins of minerals**, which we consider a useful step towards improving transparency throughout our supply chain.



6. Implementation: our human rights and environment-related due diligence processes

OTE Group has developed a comprehensive human rights and environment-related due diligence program in line with the international reference tools listed in section 4; the program has now been in place for a number of years. Based on the knowledge we have acquired, and with the involvement of internal and external experts, we have identified **groups of people on whom our business activities could potentially have a negative or a positive impact** (human rights impact assessment):

- **Employees in our Group companies**
- **Employees of our direct or indirect suppliers**
- **Our customers**
- **Children and young people**
- **Members of specific communities**

When carrying out our due diligence processes, we therefore pay special attention to the interests of particularly **vulnerable groups**, such as: **children, young people, women, migrant workers, and other members of national or ethnic, religious, or linguistic minorities. We make sure that this identification of vulnerable groups is constantly evolving, and revise it at least once per year** after carrying out our annual human rights and environment-related risk assessment.

6.1 Risk management anchored in essential business operations

Our **Group-wide risk management system** implements process steps in all essential business operations, with the aim of **identifying and minimizing human rights and environment-related risks, and preventing, ending or minimizing the extent of violations of environment-related or human rights obligations.**

The Group-wide risk management systems covers all Group companies over which OTE Group exercises decisive influence (in the

following “Group-companies”)

The Group-wide key process steps include:

- Appointment of the person responsible for monitoring the risk management
- Setting up of a **complaints procedure**
- An **annual risk analysis** for the Group-companies belonging to the own business area and their direct suppliers
- **Ad hoc risk analysis** for the entire supply chain, including business partners
- And in addition, for direct suppliers: **ongoing identification of risks**
- Derivation and implementation of **preventive and remedial action**
- **Audits and effectiveness reviews**
- **Documentation and archiving**
- **Annual reporting**

We have **defined responsibilities** for the exercise of and compliance with our due diligence processes:

- At the highest management level, the OTE’s Board of Directors is responsible for respecting human rights and environment related obligations.
- Regular and/or ad hoc internal reporting on human rights or environment-related results in decision-making bodies such as company’s Board of Directors means that decisions are always informed.

OTE has designated on a corporate level, the Executive Director Compliance, ERM and Insurance OTE Group, as the responsible Officer for managing Human Rights issues. The Human Rights Officer cooperates with the person appointed to **monitor Group-wide due diligence processes** on the level of Deutsche Telekom AG (known as the **“LkSG officer”**). The LkSG officer reports directly to the Chair of the Board of Management of Deutsche Telekom AG and has further supporting functions.

6.2 Risk analysis

Our risk management system includes an **annual risk analysis** aimed at determining



human rights and environment-related risks. The risk analysis is carried out for the Group-companies and their direct suppliers for the financial year in question. When considering and assessing risks, we pay particular attention to the interests of any persons affected/injured.

A risk exists where there are at least actual indications that suggest that a violation of human rights-related or environment-related obligations in terms of section 4 may be possible or that a specific violation has in fact taken place and that a Group-company has caused or contributed to this. Such a risk may

When considering and assessing risks, we pay particular attention to the interests of any persons affected/injured.

also arise from **violations** that have already occurred due to a breach of human rights or environmental obligations, insofar as the repetition of the facts could not be mitigated by means of appropriate preventive measures.

Alongside the annual risk analysis, additional **ad hoc** risk analyses are carried out in cases where we have actual indications that a risk of the type outlined above is possible or if we must expect a significantly changed or expanded risk situation in the supply chain. This applies to all Group-companies, direct suppliers and indirect suppliers that are known to us, and other business partners.

Prior to a merger or acquisition, human rights and environment-related risks are also systematically analyzed.

The **key process steps** in a **regular risk analysis** are:

Step 1: Identifying Group-companies/branches/sites in our own business area, as well as their direct suppliers, with a higher

propensity to risk by

- Comparing **external and internal information and sources**
- **Mapping country-specific political conditions** (e.g., risk mapping by business areas, sites, products, or countries of origin)
- Looking at **material group-specific and product-specific risks** to analyze risk in relation to suppliers.

Our sources for this are public reports on country and sector risks, internal information from management processes we have in place such as complaints procedures, risk questionnaires in the Group-companies, employee surveys, audits, and certifications. We also incorporate internal and external human rights **expertise from expert, business partners, and selected stakeholders**, including representatives of groups that are or could be affected.

To identify **direct suppliers** that are susceptible to risk, **we also use risk data from specialist external providers**. This allows us to continually monitor our global supplier chains on the basis of risk, and to carry out an ongoing assessment based on a range of publicly available sources.

We increasingly endeavor to **identify particularly vulnerable groups (such as children, ethnic and religious minorities, defenders of human rights, women, or indigenous peoples)** and to analyze the human rights risks facing them **in greater detail**.

Step 2: Carrying out a plausibility check of the results of Step 1 and weighting and prioritizing concrete human rights and environment-related risks in a specific context in the companies/branches/sites/suppliers as part of a cross-departmental risk dialog. The OTE Group Compliance, Enterprise Risks and Corporate Governance Committee - "GRC Committee", carries out a plausibility check and the weighting and prioritizing of risks within a joint risk dialog.

All findings (risks and violations) are evaluated as increasing or minimizing risk and are translated into a points scale, and in the next step, they are prioritized based on following **criteria of adequacy** e.g.

- **Nature and extent of the business activity:** "Material group classification" (e.g., material groups in which raw materials are used that are demonstrably mined in conflict or high-risk regions



or that are generally associated with violations of human rights or environmental damage; the use of dangerous machines and/or chemicals in the manufacture of (upstream) products; production using a high proportion of low-skilled manual labor, migrant workers, remote/hardly accessible workplaces, and/or a seasonal/fluctuating demand for workers)

- **Ability to influence** the party who is directly responsible
- **The severity of the violation that can typically be expected and the probability of occurrence of the violation:** number of persons affected, existence of effective prevention measures
- **Causal contribution:** party who is directly/indirectly responsible

We use the results as the basis for compiling and, where necessary, adapting internal provisions, processes, and training, to respond to the evolving demands on our due diligence processes.

6.3 Preventive measures

If a high risk is identified and prioritized during a risk analysis, we **immediately take appropriate, risk-based preventive measures**, such as:

For our own Group-companies (own business area):

We put policies and guidelines in place to implement our human rights and environment-related strategies, and adapt these as necessary. They include e.g.:

- Code of Human Rights
- Code of Conduct
- Description of Due-Diligence Risk Management
- DT Group Global Procurement Policy
- Management system for quality, health, safety, and environmental protection
- Environmental guideline

- OTE Group Diversity, Equity and Inclusion Policy

In addition, we carry out on-site **training** and **risk-based control measures**, for example, human rights impact assessments, as well as internal and external **auditing on site**.

In relation to suppliers:

Our human rights and environment-related **principles and expectations** regarding direct suppliers have been a **fundamental element of our contracts for many years, and are taken into account in the selection of suppliers**.

In addition, we take further **appropriate risk-based** measures, such as contractual guarantees, including the **establishment of suitable control mechanisms** e.g.:

- Agreeing on special contractual clauses for carrying out **risk-based control measures** such as supplier audits, support of the direct supplier in the implementation of measures towards direct suppliers in connection with risks identified
- Offering **training** on our human rights and environmental expectations
- Participation in **cross-sector initiatives**

We have a range of control mechanisms in place for annual or ad hoc monitoring of the effectiveness of preventive measures that we have implemented in our own business area or for our direct or indirect suppliers, and we update these measures as necessary. These effectiveness and control mechanisms include e.g.:

- Checking the implementation of Group Policies by means of a survey in the Group-companies within an annual risk assessment
- Carrying out employee surveys
- Monitoring the participation rate in training courses
- Carrying out internal and external audits and certification

6.4 Remedial action

If, on the basis of our risk analysis, we establish that a **violation** of our human rights or environment-related obligations **has already occurred or is imminent**, we immediately take appropriate remedial actions and prioritize them if required in accordance with the adequacy criteria described in section 6.2.: in particular, the following remedial action:

For our own Group-companies (own business area) in particular:

- Immediate measures with the aim to prevent, end or minimize the extent of violation
- Holding training courses
- Supplementing policies and adjusting processes
- Taking measures under labour law
- Involving additional specialist units and employees' representation bodies to work on a concept

The aim of the remedial action is to **end the violation**.

In relation to suppliers:

In regard to our **direct suppliers**, we make immediate contact, discuss the situation and call for behavior that is violating human rights or environment-related obligations to be stopped. If it will not be possible to end the violation in the foreseeable future, we are ready to come to an agreement with the supplier on a **joint concept** to end or minimize the violation, including a concrete timetable. To do this, we also call on external partners and sector initiatives.

If it is or becomes clear that the supplier will not meet the demands, we consider the temporary suspension of the business relationship and/or the removal of the supplier from contract award lists. If the violation is serious and/or cannot be ended, then termination of the business relationship is considered as a last resort.

Given that we have no contractual relationship with **indirect suppliers**, in case

of violations, we will first make contact with our direct supplier, if necessary, an in scope of the possible. In such cases, too, we strive to work with all those involved to come up with a concept to prevent, end or minimize the violation, and to **work together** to **implement** this concept. **We also look into participation in relevant sector initiatives.**

We have a range of control mechanisms in place to check at least once per year or on an ad hoc basis the effectiveness of the remedial action described above. These effectiveness and control mechanisms include:

- Adding specific questions to employee surveys
- Monitoring the participation rate in training courses
- Carrying out internal and external audits and certification

6.5 Documentation and annual reporting

We continually document our endeavors to effectively implement our due diligence obligations.

In addition to the human rights and environmental strategy published in this Group Policy, **OTE Group also publishes further reports** on meeting its due diligence obligations. This is currently:

- An annual report on sustainability in accordance with the relevant applicable statutory sustainability reporting obligations

7. Internal Complaints procedure

OTE Group provides **all interest groups** with the possibility to **report**, among other things, **grievances regarding human rights or environmental concerns related to OTE Group**, and to make us aware of these issues.

All concerns raised will be recorded by trained Compliance staff to be dealt with as prescribed by law and with all due consideration to **protecting the person making the complaint.**

We continually, and at least once per year, monitor the effectiveness of the complaints procedure and develop the procedure as necessary. Findings from the complaints procedure are taken into consideration in our annual risk analysis and can be a catalyst for carrying out an ad hoc risk analysis. In addition, we examine the further initiation of measures by exhausting the respective legal possibilities, e.g. steps under labor law and/or criminal law. To ensure the **widest possible accessibility** of the complaints procedure, concerns and complaints can be expressed in a **variety of ways**:

7.1. OTE Group whistleblower portal “TellME”

- **Via telephone:** +30 210 611 2345 (Monday to Friday: 10am until 5pm)
- **Via e-mail:** tellme@ote.gr - humanrights@ote.gr
- **Postal address:**
Attn: Reports Receiving and Monitoring Officer; OTE Group Compliance
99 Kifissias Ave., P.C. 15124 Maroussi, Attica, Greece
- [Electronic Whistleblowing Form](#)

7.2 Group Deutsche Telekom whistleblower portal “TellME” : information on procedures and handling of reports issued to the Group Deutsche Telekom channels are available at the webpage of Deutsche Telekom AG [“whistleblower portal TellMe”](#)

- **Via telephone**, using the free international service number +8000 3824835
- **Via email:** tell-me@telekom.de
- **Postal address:**
Deutsche Telekom AG,
Hinweisgeberportal TellMe, Friedrich-Ebert-Allee 140, 53113 Bonn, Germany
- Anonymous [online reporting](#)

8. Communication and review

This Code of Human Rights is to be made accessible to and published for all employees of OTE Group and the employees’ representation bodies. The content of this Code is to be communicated suitably to the suppliers and business partners of our Group-companies in the form of our expectations of them. We are aware that the key points in regard to human rights incl. environmental topics could change as our company develops and evolves. We therefore revise this topic and the associated human rights and environmental related due diligence obligations on an ongoing basis and adapt this Code as required.

9. Entry into force - Amendment

This code is amended when it is deemed necessary, taking into consideration the effectiveness of its implementation, the need to amend it as well as possible changes in the legal and regulatory framework. In case of any necessary amendments of the Policy, the provisions of the PL1.EEM.01 Policy (Approval of Corporate Policies / Processes / Procedures” regarding the CMS Policies) shall apply. In the case of conflict between national law and the content of this code, the Human Rights Officer in cooperation with the OTE Group Sustainability Department and the DT central unit responsible for Corporate Responsibility-currently Group Corporate Responsibility – DTAG GCR, will work with the relevant company to achieve the effect that is as close as possible to the objective of this code. When this code is implemented in the affiliated companies, the precedence of national and supranational law and the cultural norms within this framework, as well as any participation rights of the responsible or authorized employee representatives, are to be observed.



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