

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, A1 Telekom Austria Group (means Telekom Austria AG and its subsidiaries, from here on "A1") 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 Code of Conduct, but we believe that Human Rights deserve their own policy.

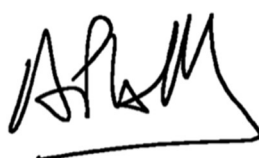
As an internationally operating company, A1 acknowledges its role in preserving and promoting Human Rights for all its employees, customers, business partners and everyone else that our business decisions might affect. For that matter, we consistently strive to promote respect for Human Rights in a manner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

The A1 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 entities, including all countries and the respective subsidiaries, employees, managers and executives and wherever A1 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

A1 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** and, finally, as an **Employer**.

2.1. Enabling Human Rights for Society

A1 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. With this in mind, 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).

A1 is therefore committed to ensure access for all of 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 Telekom Austria 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 Telekom Austria Group. The Group's contractual partners are required to comply with the principles governed by the Code of Conduct of the A1 Telekom Austria 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

A1 is a significant provider of telecommunication and internet services in several European countries. 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 Resources 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 A1. 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 and DE&I 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

If we become aware of violations towards our values and expectations regarding Human Rights, we aim to alert our business partners with the utmost urgency in order to encourage them to resolve these issues. In case of lacking compliance, we see ourselves entitled to rescind the respective commercial relationship.

2.4. A1 as an Employer

A1 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.

In order 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.

A1 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 A1, and under no circumstances may involve the use of any resources or assets owned by A1.

3. International Human Rights Standards

3.1. Our Commitment

A1 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.

A1 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, A1 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; A1 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; A1 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 A1's ambitious environmental objectives. A1 strives to constantly challenge its ecological impact and to innovate with clear and positive environmental benefits for society and the environment.

ANTI-CORRUPTION; A1 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 A1 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, A1 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

A1 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; A1 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, A1 is aware of several topics related to the involved resources and their extraction, and the respective relevance for Human Rights issues. A1 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, A1 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, A1 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; A1 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

A1 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's commitment to human rights and sets a lower standard, A1 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.