

Deutsche Telekom IT GmbH

Annual Policy Statement on the human rights strategy of Deutsche Telekom IT GmbH for the 2023 financial year in regard to its supply chain in accordance with the German “Act on Corporate due Diligence Obligations for the prevention of Human Rights Violations in Supply Chains” (*Supply Chain Due Diligence Act / Lieferkettensorgfaltspflichtengesetz – LkSG*).

This Policy Statement **complements** the elements of our human rights strategy incl. description of procedure published in our [“Code of Human Rights”](#), listing the priority human rights and environment-related risks identified on the basis of the risk analyses carried out in **2023** and the expectations we place on our employees and suppliers based on these risk analyses.

1. Priority human rights and environment-related issues identified with a potentially negative impact in the supply chain¹

After carrying out our annual analysis, we consider that the following areas that are directly or indirectly related to our business activities at our sites and in our global supply chain represent the greatest risk of a negative impact on people and/or the environment.

Our business activities in the 2023 financial year involved the design, the development and operation of IT-application, as well as the provision of a high-performance IT infrastructure.

1.1. No relevant risks in own business area identified:

We did not identify any relevant risks in the financial year.

Due to the due diligence processes that have already been established throughout the Group Deutsche Telekom for a number of years, measures have already been implemented that effectively mitigate potential abstract risks. We have published further details in the [“Code of Human Rights”](#), and we provide annual groupwide reporting including in our [„Corporate Responsibility Report“](#).

Regardless of existing specific risks within the meaning of the Supply Chain Due Diligence Act, based on our business activities we also focus in particular on the topic of **data protection and privacy in the digital world**. IT services that process data offer a potential opportunity for violations of human rights in regard to the privacy of end users and also employees. Services of this type could, for example, gather personal characteristics of affected persons, which could lead to violations of privacy and of the prohibition of discrimination.

1.2. Risks in regard to suppliers:

In regard to our **direct suppliers**, we have identified the following **high-priority risks**:

- **prohibition of unequal treatment in employment, § 2 II no. 7 LkSG**

The risks we have identified that are relevant to the Supply Chain Due Diligence Act among our **indirect suppliers** are based on the results of ad hoc risk analyses and knowledge from the due diligence processes we have carried out for several years, such as auditing. In the overall assessment, we have identified **high-priority industry risks** related to **obtaining mineral resources for the manufacture** of telecommunications products **by subcontractors**:

- **disregarding occupational safety and work-related health hazards, § 2 II no. 5 LkSG**
- **prohibition of withholding an adequate living wage, § 2 II no. 8 LkSG**

¹ This Policy Statement addresses the “supply chain” in accordance with the regulations in the German Supply Chain Due Diligence Act/ LkSG; it does not address the impact of our business activities outside of this legally defined supply chain, i.e., following delivery of our products or services to the customer (use phase) or in the disposal/recycling phase; we provide information on this phase of the downstream value chain on our [website](#)

We are aware that, in particular in our indirect supply chain in the area of raw material procurement (conflict minerals) and the processing of these, we have low levels of potential influence and of transparency. We therefore join forces with other enterprises in sector initiatives and sector standards e.g. [„Joint Alliance for CSR \(JAC\)“](#) in order to increase our ability to influence the entity responsible.

2. Our expectations

In our awareness of the areas identified in section 1, and in order to expand on and reinforce the content of our *“Code of Human Rights”*, we place the following expectations on all those who are employed by Deutsche Telekom IT GmbH or by Group-company and on our suppliers:

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 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 globally applicable basis for cooperation in the 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 *“DE&I Group Policy”* as well as in our *“Leadership Anchors”*, the DT leadership behavioral guidelines.

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.

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 employees with a decent standard of living livelihood in terms of the international reference tools e.g. „International Bill of Human Rights“ especially with regards to Article 7 letter a) number ii) of the „International Covenant on Civil and Political Rights“ from December 19th 1966.

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 and expectations on these matters**, 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.

Bonn, Date 11.27.2023

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