# Corporate Responsibility Report 2021

**GRI-Index** 

Global Compact Communication on Progress

**Sustainability Accounting Standards Board (SASB)** 



# **General Disclosures**

Indicator Reference

#### **GRI 102: General Disclosures**

Organization profile

#### 102-1 Name of the organization

- Management & facts > Strategy > CR strategy & management > Business activities and organization
- www.telekom.com/en/company/company-profile

#### 102-2 Primary brands, products and services

Management & facts > Strategy > CR strategy & management > Business activities and organization

There were no bans on products and/or services in any countries in 2021.

#### 102-3 Location of headquarters

www.cr-report.telekom.com/2021/imprint

#### 102-4 Location of operations

www.telekom.com/en/company/worldwide

#### 102-5 Ownership and legal form

www.telekom.com/en/company/company-profile

#### 102-6 Markets served

- www.telekom.com/en/company/worldwide
- 2021 annual report
- Management & facts > Strategy > CR strategy & management > Business activities and organization

#### 102-7 Scale of the organization

- Management & facts > Strategy > CR strategy & management > Business activities and organization
- 2021 annual report > Management report Selected financial data of the Group
- Management & facts > Social > Headcount and part-time work > Headcount and part-time work

About 14 percent of employees in Germany covered by collective agreements, and 18.2 percent of civil servants, are making use of part-time arrangements (as of Dec. 31, 2021). In addition, a total of 29 executives are working part-time (as of Dec. 31, 2021).

Indicator Reference

Management & facts > Economy > Suppliers > Supply chain management

2021 annual report

Risk management, compliance management, and the ESG KPIs provide approaches for preventive action at Deutsche Telekom.

- Management & facts > Strategy > CR strategy & management > Risk and opportunity management
- Management & facts > Strategy > Compliance > Compliance
- Management & facts > Strategy > CR strategy & managementESG Key Performance Indicators

#### 102–12 External initiatives

- Management & facts > Strategy > Sustainability standards > Global Compact Communication on Progress
- Management & facts > Strategy > Sustainability standards > German Sustainability Code
- Management & facts > Strategy > Sustainability standards > SASB
- Management & facts > Strategy > CR strategy & management > Values and Guiding Principles
- Management & facts > Strategy > Stakeholder management > Overview of memberships and collaborations
- Management & facts > Economy > Suppliers > Our approach for sustainable procurement

#### 102-13 Memberships of associations

- Management & facts > Strategy > Stakeholder management > Overview of memberships and collaborations
- Management & facts > Strategy > Political advocacy > Political advocacy

Due to reasons of confidentiality, it is not possible to list our memberships and collaborations based on strategic aspects. Our policy on political advocacy applies to our involvement in committees and associations.

Indicator Reference
Strategy and analysis

#### 102-14 Statement from senior decision-maker

Management & facts > Strategy > Foreword > Statement by the Chairman of the Board of Management

#### 102-15 Key impacts, risks and opportunities

Management & facts > Strategy > CR strategy & management > Risk and opportunity management

Ethics and integrity

# 102–16 Values, principles, standards, and norms of behavior

Management & facts > Strategy > CR strategy & management > Values and Guiding Principles

## 102–17 Mechanisms for advice and concerns about ethics

- Management & facts > Strategy > Compliance > Holistic compliance management system
- ▶ Management & facts > Strategy > Compliance > Systematic handling of infractions

Governance

#### 102-18 Governance structure

- Management & facts > Strategy > CR strategy & management> Business activities and organization
- www.telekom.com/en/company/company-profile

#### 102-19 Delegating authority

- Management & facts > Strategy > CR strategy & managementBusiness activities and organization
- Management & facts > Strategy > CR strategy & management > Current organizational structure

# 102–20 Executive-level responsibility for economic, environmental, and social topics

- Management & facts > Strategy > CR strategy & management > Business activities and organization
- Management & facts > Strategy > CR strategy & management > Current organizational structure

# 102-24 Nominating and selecting the highest governance body

All skills and abilities required and useful in effectively enacting the responsibilities of a position are taken into consideration during the selection process. The requirements of a position are identified using a skills list.

The selection process is conducted by the Supervisory Board, which acts in the interests of stakeholders and shareholders.

Indicator Reference Stakeholder engagement

#### 102-40 List of stakeholder groups

- Management & facts > Strategy > Materiality > Our process for identifying material CR topics
- Management & facts > Strategy > Stakeholder management > Formats for stakeholder engagement

#### 102-41 Collective bargaining agreements

As of December 31, 2021, 73 % of employees in Germany were covered by collective agreements. We record the Group-wide coverage rate every two years. As of December 31, 2020, it stood at just under 46 %.

2021 annual report > Management report > Corporate responsibility and non-financial statement > Aspect 2: Employee concerns

#### 102-42 Identifying and selecting stakeholders

Management & facts > Strategy > Stakeholder management > Formats for stakeholder engagement

#### 102–43 Approach to stakeholder engagement

- Management & facts > Strategy > Stakeholder management > Formats for stakeholder engagement
- Management & facts > Strategy > Stakeholder management > Overview of memberships and collaborations

We work with various feedback formats that are difficult to classify due to their variety. Because we have informal discussions with our stakeholders at dialog events, the feedback cannot be broken down according to the stakeholder groups.

#### 102-44 Key topics and concerns raised

- Management & facts > Strategy > Materiality > Our process for identifying material CR topics
- Management & facts > Strategy > Stakeholder management > Formats for stakeholder engagement

Identified material aspects and boundaries

# 102–45 Entities included in the consolidated financial statements

www.telekom.com/en/company/worldwide

#### 102-46 Defining report content and topic boundaries

- Management & facts > Strategy > Materiality > Results of the materiality analysis
- Management & facts > Strategy > Materiality > Our process for identifying material CR topics
- Management & facts > Strategy > Materiality > Material topics matched with GRI aspects

**GRI-INDEX**GENERAL DISCLOSURES

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#### Indicator Reference

#### 102-47 List of material topics

- Management & facts > Strategy > Materiality > Results of the materiality analysis
- Management & facts > Strategy > Materiality > Material topics matched with GRI aspects

#### 102-48 Restatements of information

There was no cause to restate information within the reporting period. You will find the links to the report structure.

> About this report

#### 102-49 Changes in reporting

There were no changes in reporting in the reporting period. You will find the links to the report structure and the main topics opposite.

- About this report
- Management & facts > Strategy > Materiality > Results of the materiality analysis

#### Report profile

#### 102-50 Reporting period

> About this report

#### 102-51 Date of most recent report

> About this report

#### 102-52 Reporting cycle

About this report

#### 102-53 Contact point for questions regarding the report

Imprint

# 102–54 Claims of reporting in accordance with the GRI Standards

Management & facts > Strategy > Sustainability standards > GRI Index

#### 102-55 GRI content index

Management & facts > Strategy > Sustainability standards > GRI Index

#### 102-56 External assurance

- Management & facts > Strategy > Sustainability standards > GRI Index
- About this report > Independent assurance report

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# **Topic-specific Standards**

Indicator Reference

**GRI 203: Indirect Economic Impacts** 

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

Management & facts > Economy > Network expansion > Our approach to infrastructural expansion

#### 203–1 Infrastructure investments and services supported

- ➤ Management & facts > Economy > Network expansion > Our approach to infrastructure expansion
- 2021 annual report

GRI 205: Anti-corruption

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

➤ Management & facts > Strategy > Compliance > Holistic compliance management system

#### 205–1 Operations assessed for risks related to corruption

The following risks of corruption were identified as the most likely within the scope of our risk analysis:

- Acceptance of a benefit in connection with a specific business decision (e.g., a supplier invites an employee to a prestigious sports event, where there is a close material and temporal correlation between the event and the upcoming renewal of an existing agreement).
- An employee formulates selection criteria in favor of one supplier/consultant. Procurement has no choice other than to include this supplier/consultant in its selection. Alternatively, an employee influences an auction/tender in favor of one bidder. In return, the employee receives a benefit from the supplier/consultant.
- 3. An employee makes an agreement with a supplier to add 10 percent to a bill. The supplier pays half of the extra amount charged into a private bank account of the employee.

Indicator Reference

- 4. A benefit is granted to a business partner's employee or representative in connection with a specific forthcoming business decision in order to gain an unfair competitive advantage (e.g., inviting a decision-maker on the customer side to a prestigious sports event in order to sway them into renewing the existing framework agreement that is coming up for renewal).
- 5. An employee awards a contract in return for something without first obtaining a comparative bid from a competitor, which represents a breach of duty. It makes no difference whether or not the competitor's bid would actually have been lower.

Each year, we carry out a Group-wide compliance risk assessment (CRA) to determine compliance risks and develop tailored compliance measures. In 2021, the CRA included 112 companies and thus covered around 98.1 percent (based on the number of employees in the fully consolidated companies).

205–2 Communication and training about anti-corruption policies and procedures

Communication and training on anti-corruption policies and procedures

We use regular training measures to inform and raise awareness among our employees about compliance. In addition to class-room courses, we also use various interactive e-learning formats. In addition, customized classroom courses on compliance and anti-corruption are given to members of the management boards and executives. Managers are addressed about their extraordinary responsibility and informed about trends and changes in the law

#### E-learning training Group-wide

In 2021, more than 36,000 employees in high-risk positions (sales, procurement) completed the anti-corruption e-learning course, around 165,000 employees received a certificate for completing a compliance e-learning course; at T-Mobile US, more than 60,000 employees also took part in a company-specific integrity e-learning in the reporting year.

#### Implementation of Group Policy throughout the Group

Deutsche Telekom has introduced the Group Policy on Avoiding Corruption and Other Conflicts of Interest, which sets out the relevant responsibilities and duties and includes a list of possible conflicts of interest. We also introduced our Group Policy on Accepting and Granting of Benefits, which clearly specifies which benefits may be granted to and accepted from business partners. Both policies have been rolled out and communicated throughout the Group and approved by the managing boards at the various companies.

Indicator Reference

Providing information and training to business partners

Our business partners are required to accept the Deutsche Telekom General Terms and Conditions for Purchasing before entering into a business relationship with us. These include a Supplier Code of Conduct incorporating our principles for avoiding corruption. In addition, we ask our business partners questions regarding their compliance management systems as part of the supplier self-assessment process. Deutsche Telekom has been offering online compliance training to external business partners and suppliers since September 2014. The training particularly focuses on small and medium-sized German business partners and suppliers. This encourages our partners even more to conduct their business ethically and in compliance with relevant laws and regulations. The training addresses specific compliance-relevant topics such as corruption prevention, anti-trust law, and sustainability and introduces Deutsche Telekom's compliance management system.

## 205-3 Confirmed incidents of corruption and actions taken

Deutsche Telekom engages in extensive compliance management activities to prevent and fight corruption. Any violations we uncover during our investigations are punished appropriately. In some cases, employment relationships have even been terminated for good cause. You can find more information on the Deutsche Telekom website.

www.telekom.com/en/company/compliance/details/factsand-figures-360690

#### GRI 301: Materials

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

Management & facts > Economy > Sustainable and innovative products > Our approach to sustainable products and services

#### 301–3 Reclaimed products and their packaging materials

- Management & facts > Environment > Waste prevention & recycling > Sustainable product packaging
- Management & facts > Environment > Waste prevention & recycling > Used mobile device collection
- Management & facts > Environment > Waste prevention & recycling > ESG KPI "Take Back Mobile Devices"
- Management & facts > Environment > Waste prevention & recycling > ESG KPI "Take Back CPEs"

Indicator Reference

#### GRI 302: Energy

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Management & facts > Environment > Climate targets & risks > Our approach to measuring our climate-protection progress
- Management & facts > Environment > Energy consumption & efficiency > Our approach to energy-efficient networks
- Management & facts > Environment > Resource efficiency in operations > More-sustainable Deutsche Telekom buildings
- Management & facts > Environment > Mobility > Our strategy for climate-friendly mobility in Germany

#### 302-1 Energy consumption within the organization

- Management & facts > Environment > Energy consumption & efficiency > Total energy consumption <</p>
- Management & facts > Environment > Renewable energy > ESG KPI "Renewable Energy" < ✓</p>
- Management & facts > Environment > Renewable energy > Renewable energy in the Group

Energy consumption at Deutsche Telekom primarily pertains to the consumption of electricity, district heating, fossil fuels, and fuel for our vehicle fleet. The amount of energy sold by Deutsche Telekom is not significant and generally not included in our energy and fuel consumption values.

#### 302-3 Energy intensity

Management & facts > Environment > Energy consumption & efficiency > ESG KPI "Energy Intensity" Deutsche Telekom Group ♥

#### **GRI 305: Emissions**

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Management & facts > Environment > Circular economy & climate strategy > Climate strategy
- Management & facts > Environment > CO<sub>2</sub>e emissions > Total CO<sub>2</sub>e emissions (Scope 1–3) Deutsche Telekom Group
- Our approach to sustainable products and services

#### 305-1 Direct (Scope 1) GHG emissions

- Management & facts > Environment > CO₂e emissions > ESG KPI "Carbon Intensity" Deutsche Telekom Group
- Management & facts > Environment > CO₂e emissions > Total CO₂e emissions (Scope 1 & 2)

Indicator Reference

#### 305–2 Energy indirect (Scope 2) GHG emissions

- Management & facts > Environment > CO₂e emissions > ESG KPI "Carbon Intensity" Deutsche Telekom Group
- Management & facts > Environment > CO₂e emissions > Total CO₂e emissions (Scope 1 & 2)

#### 305-3 Other indirect (Scope 3) GHG emissions

Management & facts > Environment > CO₂e emissions > Total CO₂e emissions (Scope 1-3) Deutsche Telekom Group

#### 305–5 Reduction of GHG emissions

- Management & facts > Environment > Circular economy & climate strategy > Climate strategy
- Management & facts > Environment > Circular economy & climate strategy > #GreenMagenta Program
- Management & facts > Environment > Enablement factor > Enablement factor: Customers saving on CO<sub>2</sub> emissions

#### GRI 306: Effluents and Waste

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Management & facts > Environment > Circular economy & climate strategy > #GreenMagenta Program
- Management & facts > Environment > Waste prevention & recycling > Waste management & recycling
- Management & facts > Environment > Waste prevention & recycling > Waste production, including e-waste <</p>
- Management & facts > Environment > Circular economy & climate strategy > Our approach for a circular economy
- Management & facts > Environment > Waste prevention & recycling > Used mobile device collection

# 306–1 Waste generation and significant waste-related impacts

Deutsche Telekom has a Group-wide waste management policy in place (e.g., for recycling copper) to handle the major types of waste produced by its business activities. As part of our waste management program, we transparently map the waste we generate. In addition to waste generation, we also record facts and figures relating to the utilization of technical and hazardous waste. Further-reaching data collection regarding disposal methods is complex, and the amount of time and work involved could not be reasonably justified based on the benefit this type of data collection would bring. We comply with all legal requirements in all countries when disposing of hazardous waste.

- Management & facts > Environment > Waste prevention & recycling > Waste management & recycling

Indicator Reference

- Management & facts > Environment > Waste prevention & recycling > Used mobile device collection
- Management & facts > Environment > Waste prevention & recycling > ESG KPI "Take Back Mobile Devices"
- Management & facts > Environment > Waste prevention & recycling > ESG KPI "Take Back CPEs"

# 306-2 Management of significant waste-related impacts

Deutsche Telekom has a Group-wide waste management policy in place (e.g., for recycling copper) to handle the major types of waste produced by its business activities. Further-reaching data collection regarding disposal methods is complex, and the amount of time and work involved could not be reasonably justified based on the benefit this type of data collection would bring. We comply with all legal requirements in all countries when disposing of hazardous waste.

- Management & facts > Environment > Circular economy & climate strategy > Our approach for a circular economy
- Management & facts > Environment > Waste prevention & recycling > Used mobile device collection
- Management & facts > Environment > Waste prevention & recycling > Waste management & recycling
- Management & facts > Environment > Waste prevention & recycling > Sustainable product packaging
- Management & facts > Environment > Waste prevention & recycling > Paper-free and low-paper work

#### 306-3 Waste generated

Management & facts > Environment > Waste prevention & recycling > Waste production, including e-waste 

✓

#### 306-4 Waste diverted from disposal

Management & facts > Environment > Waste prevention & recycling > Waste management & recycling

#### 306-5 Waste diverted to disposal

Management & facts > Environment > Waste prevention & recycling > Waste management & recycling

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Indicator Reference GRI 401: Employment

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- ▶ Management & facts > Social > Corporate culture & the workplace > Our corporate culture
- Management & facts > Social > Staff turnover & restructuring > Fluctuation rate
- Management & facts > Social > Staff turnover & restructuring > Proportion of civil servants in Group workforce
- Management & facts > Social > Staff turnover & restructuring > Socially responsible staff restructuring

#### 401-1 New employee hires and employee turnover

- Management & facts > Social > Headcount and part-time work > Workforce development worldwide
- Management & facts > Social > Staff turnover & restructuring > Fluctuation rate
- Management & facts > Social > Staff turnover & restructuring > Proportion of civil servants in Group workforce
- Management & facts > Social > Staff turnover & restructuring > Socially responsible staff restructuring

The number of employees entering retirement, an important component of natural employee churn, is not recorded within the scope of the annual workforce structure report. We therefore cannot provide a breakdown of natural churn according to gender and age. The time and effort involved in more detailed data collection would exceed any insights gained.

#### GRI 405: Diversity and Equal Opportunity

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

Management & facts > Social > Diversity > Our approach to diversity and equal opportunities

#### 405-1 Diversity of governance bodies and employees

- Management & facts > Social > Diversity > Commitment to a larger share of women
- Management & facts > Social > Diversity > Employees with disabilities
- Management & facts > Social > Demography and company pension scheme > Age structure at the Deutsche Telekom Group
- Management & facts > Social > Diversity > Percentage of women on the Supervisory Boards

Indicator Reference

- Management & facts > Social > Diversity > Percentage of women on the management board
- Management & facts > Social > Diversity > Percentage of women in middle and upper management

Deutsche Telekom is an international corporation that is only represented by a majority interest in some of its national companies. For that reason it is not possible to break down these values based on employee category.

### 405–2 Ratio of basic salary and remuneration of women to men

Management & facts > Social > Employee relations > Fair pay and benefits

We have been comparing the pay of male and female employees for several years now. We were unable to identify any significant gender-based differences in pay for our employees in Germany.

In the past, studies (e.g., Logib-D, "eg-check") confirmed that employees receive the same pay for the same job regardless of their gender.

In March 2021, we once again received the "eg-check" certificate from the German Federal Anti-Discrimination Agency. As part of the "eg-check", important requirements such as knowledge, skills, communication, cooperation, and responsibility are all taken into account – criteria which are also applied to Deutsche Telekom's grading process. The methods used for the review were based on statistics, pairwise comparisons, and an extensive check of regulations.

It was not possible to record the pay of our employees at all of our international locations due to data unavailability, relevance to competition, and the time and effort involved.

#### GRI 406: Non-discrimination

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Management & facts > Social > Human rights > Our approach to protecting human rights
- #TAKEPART sustainably > New way of working > Human rights > Human rights page

# $406\!-\!1$ Incidents of discrimination and corrective actions taken

- Management & facts > Social > Human rights > Human Rights & Social Performance Report
- Management & facts > Social > Human rights > Information and questions about human rights

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Indicator Reference

#### GRI 407: Freedom of Association and Collective Bargaining

#### GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Management & facts > Social > Human rights > Our approach to protecting human rights
- #TAKEPART sustainably > New way of working > Human rights > Human rights page

# 407–1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

To our knowledge, there are no cases of this nature. Deutsche Telekom recognizes the fundamental right to freedom of association and the right to collective bargaining within the scope of national regulations and existing agreements. These principles form an integral part of the Code of Human Rights & Social Principles, are binding for the entire Group, and must be confirmed in writing annually by the Group companies. We likewise expect our business partners and suppliers to comply with these principles as long as they do not contradict national legislation.

#### GRI 408: Child Labor

#### GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Management & facts > Economy > Suppliers > Our approach to sustainable procurement
- Management & facts > Social > Human rights > Our approach to protecting human rights
- Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > 2021 audit results

# 408–1 Operations and suppliers at significant risk for incidents of child labor

- Management & facts > Economy > Suppliers > 2021 audit results
- Code of Human Rights & Social Principles

No significant risk of child labor was identified at our direct business facilities, business partners, and suppliers.

Indicator Reference

#### GRI 409: Forced or Compulsory Labor

#### GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Management & facts > Social > Human rights > Our approach to protecting human rights
- Management & facts > Social > Human rights > Code of Human Rights & Social Principles
- #TAKEPART sustainably > Good stewardship > Supply Chain > Supply chain page
- Management & facts > Economy > Suppliers > Our approach to sustainable procurement
- Management & facts > Economy > Suppliers > Supplier Development Program

# 409–1 Operations and suppliers at significant risk for incidents of forced or compulsory labor

Risks related to forced labor are combated by auditing selected strategic and particularly high-risk suppliers. No significant risk of forced or compulsory labor was identified at our direct business facilities.

Management & facts > Economy > Suppliers > 2021 audit results

#### GRI 412: Human Rights Assessment

#### GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Management & facts > Social > Human rights > Our approach to protecting human rights
- #TAKEPART sustainably > New way of working > Human rights > Human rights page

# 412–1 Operations that have been subject to human rights reviews or impact assessments

- Management & facts > Social > Human rights > Our approach to protecting human rights
- #TAKEPART sustainably > New way of working > Human rights > Human rights page

Indicator Reference

#### GRI 414: Supplier Social Assessment

#### GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- #TAKEPART sustainably > Good stewardship > Supply Chain > Supply chain page
- Management & facts > Economy > Suppliers > Our approach to sustainable procurement
- Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > 2021 audit results

### 414–1 New suppliers that were screened using social criteria

We regularly check and develop the compliance of our existing and future suppliers with social and ecological aspects. This also includes fundamental human rights. In 2021, the share of these CR-qualified suppliers was 60 percent of the procurement volume.

Management & facts > Economy > Suppliers > ESG KPI "Procurement Volume Verified as Non-Critical"

## 414–2 Negative social impacts in the supply chain and actions taken

Management & facts > Economy > Suppliers > 2021 audit results

#### GRI 416: Customer Health and Safety

#### GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Management & facts > Economy > Consumer protection > Our approach to consumer protection
- Management & facts > Economy > Consumer protection > Our approach to safe mobile communication
- Our approach to sustainable products and services

# 416–2 Incidents of non-compliance concerning the health and safety impacts of products and services

- Management & facts > Strategy > Compliance > Systematic handling of infractions
- 2021 annual report > Management report > Risk and opportunity management > Risks and opportunities

Indicator Reference

#### GRI 418: Customer Privacy

#### GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Our approach to data protection
- Management & facts > Economy > Consumer protection > Our approach to consumer protection

## 418–1 Substantiated complaints concerning breaches of customer privacy and losses of customer data

- Management & facts > Strategy > Compliance > Systematic handling of infractions
- Management & facts > Economy > Data protection and data security > Protection of personal data
- 2021 annual report > Management report > Risk and opportunity management > Risks and opportunities

#### GRI 419: Socioeconomic Compliance

#### GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

Management & facts > Strategy > Compliance > Holistic compliance management system

# 419–1 Non-compliance with laws and regulations in the social and economic area

- Management & facts > Strategy > Compliance > Systematic handling of infractions
- 2021 annual report > Management report > Risk and opportunity management > Risks and opportunities

# **Further GRI aspects reported**

Indicator Reference

GRI 419: Socioeconomic Compliance

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

www.telekom.com/en/company/company-profile

#### 201–1 Direct economic value generated and distributed

- Management & facts > Economy > Financial personnel indicators > Personnel costs and personnel cost ratio
- Management & facts > Economy > Financial performance indicators > Net value added
- Annual Report 2021 > Management report > Development of business in the Group > Results of operations of the Group

# 201–2 Financial implications and other risks and opportunities due to climate change

- Management & facts > Economy > Sustainable finance > EU taxonomy: compliance in 2021
- Management & facts > Economy > Sustainable finance > Taxonomy activity 8.1: Data processing, hosting and related activities
- Management & facts > Economy > Sustainable finance > Taxonomy activity 8.2: Data-driven solutions for GHG emissions reductions

# 201–3 Defined benefit plan obligations and other retirement plans

Management & facts > Social > Demography and company pension scheme > Company pension schemes

#### **GRI 204: Procurement Practices**

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- ▶ Management & facts > Economy > Suppliers > Our approach to sustainable procurement
- Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > Responsible procurement of raw materials

Indicator Reference

#### 204–1 Proportion of spending on local suppliers

As an ICT company, Deutsche Telekom works with suppliers worldwide. That is why we do not have Group-wide policies giving priority to local suppliers at our locations.

Management & facts > Economy > Suppliers > Expenditure analysis 2021

GRI 207: Taxes

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

Management & facts > Economy > Sustainable finance > Taxes

#### 207-1 Approach to tax

Management & facts > Economy > Sustainable finance > Taxes

#### 207-2 Tax governance, control, and risk management

Management & facts > Economy > Sustainable finance > Taxes

#### 207-4 Country-by-country reporting

Country-by-country reporting

#### GRI 308: Supplier Environmental Assessment

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Management & facts > Economy > Suppliers > Our approach to sustainable procurement
- Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > 2021 audit results

Indicator Reference

#### 308–1 New suppliers that were screened using environmental criteria

We regularly check and develop the compliance of our existing and future suppliers with social and ecological aspects. This also includes fundamental human rights. In 2021, the share of these CR-qualified suppliers was 60 percent of the procurement volume.

Management & facts > Economy > Suppliers > ESG KPI "Procurement Volume Verified as Non-Critical"

In addition, 72 percent of our purchases from emissions-intensive suppliers were covered by the CDP Supply Chain Program in 2021.

Management & facts > Economy > Suppliers > ESG KPI "CDP Supply Chain Program"

308–2 Negative environmental impacts in the supply chain and actions taken

Management & facts > Economy > Suppliers > 2021 audit results

#### GRI 402: Labor/Management Relations

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

- Management & facts > Social > Corporate culture & the workplace > Our corporate culture
- Management & facts > Social > Employee relations > Our approach to shaping employee relations

# 402–1 Minimum notice periods regarding operational changes

This indicator cannot be used for Deutsche Telekom as a global corporation because of the extensive effort involved in compiling all country-specific regulations, an effort that exceeds the benefit of such activities. The relevant works council committees are informed of significant operational changes and involved according to the legally applicable provisions such as the German Works Constitution Act (Betriebsverfassungsgesetz). We also regularly engage in dialog with employee representatives at a national and European level.

#### GRI 403: Occupational Health and Safety

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

Management & facts > Social > Occupational health and safety > Our approach to health and occupational safety Indicator Reference

#### 403-1 Occupational health and safety management

Management & facts > Social > Occupational health and safety > Our approach to health and occupational safety

Deutsche Telekom AG has three umbrella certificates:

ISO 9001:2015: 18 locations, 12 companies

ISO 14001:2015: 91 locations, 63 companies

ISO 45001:2018: 83 locations, 59 companies

Further certificates can be viewed in the profiles of the national companies.

#### 403-6 Promotion of worker health

- Management & facts > Social > Occupational health and safety > Our approach to health and occupational safety
- Management & facts > Social > Occupational health and safety > Effectiveness of our occupational health and safety measures
- Management & facts > Social > Occupational health and safety > Digitalization and health
- Management & facts > Social > Occupational health and safety > Psychosocial counseling as part of change management

#### 403-9 Work-related injuries

- Management & facts > Social > Occupational health and safety > Effectiveness of our occupational health and safety measures
- Management & facts > Social > Occupational health and safety > Health rate
- Management & facts > Social > Headcount and part-time work > Work-related accidents in Germany

#### 403-10 Work-related ill health

- Management & facts > Social > Occupational health and safety > Effectiveness of our occupational health and safety measures
- Management & facts > Social > Occupational health and safety > Health rate
- Management & facts > Social > Headcount and part-time work > Work-related accidents in Germany
- Management & facts > Social > Occupational health and safety > Psychosocial counseling as part of change management

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Indicator Reference

#### GRI 404: Training and Education

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

Management & facts > Social > Training and development > Our approach to training and development

#### 404-1 Average hours of training per year per employee

#### Vocational training (Group in Germany)

	Total hours 2021	Women	Men
Apprentices	6 789 600*	1 901 088*	4 888 512*
Students on cooperative study pro- grams	3 083 472*	647 529*	2 435 943*
Total	9 873 072*	2 548 617*	7 324 455*

#### (\* Calculations based on average values for 2021.)

#### Skills development (Group - international)

Our employees around the globe spent some 4 million hours on training and skills development in 2021. Overall, LEX users completed a total of 3.5 million hours of online learning in 2021 – and the comparable figure for 2019 was only 1.8 million. In 2021, 83 percent of the training courses available for registration throughout the Group were available online. During the COVID-19 pandemic, when large numbers of employees have been working from home, and no classroom courses have been available, this extensive range of online courses has been very helpful in keeping training available to employees.

Management & facts > Social > Training and development > Our approach to training and development

# 404–2 Programs for upgrading employee skills and transition assistance programs

- Programs for lifelong learning
- Training and development
- Departure from the company and career perspectives

Depending on the situation, we use various tools to help affected employees leave their job at the Group in a socially acceptable manner. This includes options such as outplacement consulting and severance payments. In addition, Vivento, the service provider for staff restructuring in Germany, offers assistance to civil servants when transferring to a public-sector employer. 70 civil servants employed at Deutsche Telekom in Germany opted for a permanent transfer to federal, state, or local authorities in 2021.

- Management & facts > Social > Training and development > Our approach to training and development
- ➤ Management & facts > Social > Corporate culture & the workplace > Flexible working models for a wide range of needs at Deutsche Telekom in Germany

Indicator Reference

404–3 Percentage of employees receiving regular performance and career development reviews

We use various tools to assess the performance and career development of our employees.

- "Compass" for employees covered by collective agreements and civil servants in Germany
- "WeGrow" for managers in executive positions worldwide, employees not covered by collective agreements in Germany, and employees of national companies
- Our performance management is currently undergoing further development, with a clear focus on feedback discussions and transparency meetings.
- Performance management tools and employee category & number and proportion of employees whose performance and career development are assessed
- Compass (employees covered by collective agreements in Germany): approx. 74 000 employees (100 percent of target group)
- WeGrow (managers in executive positions, employees not covered by collective agreements in Germany, employees of national companies): approx. 33 000 employees (100 percent of the target group)

#### GRI 415: Public Policy

GRI 103: Management Approach

103–1 Explain why the topic is material and provide its boundary.

103–2 Explain how the organization manages the topic. 103–3 Explain how the organization evaluates the management approach.

Management & facts > Strategy > Political advocacy > Political advocacy

# Global Compact Communication on Progress

#### Principle 1: Support and respect for internationally proclaimed human rights

- Management & facts > Social > Human rights
- Management & facts > Strategy > CR strategy & managementValues and Guiding Principles
- Management & facts > Strategy > Compliance
- Management & facts > Economy > Data protection and data security
- Management & facts > Strategy > Political advocacy
- Management & facts > Social > Human rights > Code of Human Rights & Social Principles
- ▶ Management & facts > Social > Employee relationships > Fair pay and benefits
- Management & facts > Economy > Suppliers > Our approach for sustainable procurement
- Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > Auditing procedures
- Management & facts > Economy > Consumer protection
- Management & facts > Social > Occupational health and safety
- Management & facts > Social > Diversity
- Annual Report 2021 > Management report > Employees
- Annual Report 2021 > Management report > Group strategy
- Annual Report 2021 > Management report > Management of the Group

#### Principle 2: No complicity in human rights abuses

- Management & facts > Strategy > CR strategy & management > Values and Guiding Principles
- Management & facts > Strategy > Compliance
- Management & facts > Strategy > Political advocacy
- Management & facts > Economy > Consumer protection
- ➤ Management & facts > Economy > Suppliers > Our approach for sustainable procurement
- Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > Auditing procedures
- Management & facts > Social > Human rights > Human Rights and Social Performance Report

# Principle 3: Uphold freedom of association and the right to collective bargaining

- Management & facts > Strategy > CR strategy & managementValues and Guiding Principles
- Management & facts > Social > Employee relationships > Dialog and cooperation with employee representatives
- Management & facts > Strategy > Compliance
- Management & facts > Economy > Suppliers > Our approach for sustainable procurement
- ▶ Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > Auditing procedures

# Principle 4: Elimination of all forms of forced and compulsory labor

- Management & facts > Strategy > CR strategy & management > Values and Guiding Principles
- Management & facts > Strategy > Compliance
- Management & facts > Strategy > Political advocacy
- Management & facts > Economy > Suppliers > Our approach for sustainable procurement
- Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > Auditing procedures

#### Principle 5: Abolition of child labor

- Management & facts > Strategy > CR strategy & managementValues and Guiding Principles
- Management & facts > Strategy > Compliance
- Management & facts > Strategy > Political advocacy
- Management & facts > Economy > Suppliers > Our approach for sustainable procurement
- Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > Auditing procedures

GLOBAL COMPACT COMMUNICATION ON PROGRESS

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# Principle 6: Elimination of discrimination in respect of employment and occupation

- Management & facts > Strategy > CR strategy & management > Values and Guiding Principles
- Management & facts > Strategy > Compliance
- Management & facts > Social > Diversity
- Annual Report 2021 > Management report > Employees
- www.telekom.com/en/investor-relations/management-andcorporate-governance/reports-and-declarations

# Principle 7: Support a precautionary approach to environmental challenges

- Management & facts > Strategy > CR strategy & management > CR strategy
- Management & facts > Strategy > CR strategy & management > Our management tools – the ESG key performance indicators
- Management & facts > Strategy > CR strategy & management > Governance
- Management & facts > Strategy > Political advocacy
- Management & facts > Strategy > CR strategy & management > Risk and opportunity management
- Management & facts > Environment > Circular economy & climate strategy > Climate strategy
- Management & facts > Environment > Circular economy & climate strategy > #GreenMagenta Program
- Management & facts > Environment > Circular economy & climate strategy > Our approach for a circular economy
- Management & facts > Environment > Energy consumption & efficiency
- Management & facts > Environment > Additional ecological information > Protecting biodiversity
- Management & facts > Environment > Mobility > Our strategy for climate-friendly mobility in Germany
- Management & facts > Environment > Employee initiatives
- Management & facts > Economy > Sustainable and innovative products
- Management & facts > Economy > Suppliers > Our approach for sustainable procurement
- Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > Auditing procedures
- Management & facts > Economy > Suppliers > Responsible procurement of raw materials
- Management & facts > Environment > CO<sub>2</sub>e emissions > Carbon Intensity
- Management & facts > Environment > Energy consumption & efficiency > Energy Intensity
- Management & facts > Environment > Waste management & recycling > Waste management and volume

- Management & facts > Environment > Waste management & recycling > Mobile device collection
- Annual Report 2021 > Management report > Risk and opportunity management

# Principle 8: Undertake initiatives to promote greater environmental responsibility

- Management & facts > Strategy > CR strategy & management > Values and Guiding Principles
- Management & facts > Strategy > CR strategy & management > CR strategy
- Management & facts > Strategy > CR strategy & management > Our management tools – the ESG key performance indicators
- Management & facts > Strategy > CR strategy & management > Governance
- Management & facts > Strategy > Political advocacy
- Management & facts > Environment > Circular economy & climate strategy
- Management & facts > Environment > Circular economy & climate strategy > #GreenMagenta Program
- Management & facts > Environment > Resource efficiency in operations
- Management & facts > Environment > Energy consumption & efficiency
- Management & facts > Environment > Additional ecological information > Protecting biodiversity
- Management & facts > Environment > Employee initiatives
- Management & facts > Economy > Suppliers > Our approach for sustainable procurement
- Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > Auditing procedures
- Management & facts > Economy > Suppliers > Responsible procurement of raw materials
- Specific absorption rate
  www.telekom.de/hilfe/geraete-zubehoer/handy-smartphonetablet/allgemein/sar-werte?samChecked=true
- Annual Report 2021 > Management report > Risk and opportunity management

# Principle 9: Encourage the development and diffusion of environmentally friendly technologies

- Management & facts > Strategy > CR strategy & management > CR strategy
- Management & facts > Strategy > CR strategy & management > Our management tools – the ESG key performance indicators
- Management & facts > Strategy > CR strategy & management > Governance
- Management & facts > Environment > Environmentally friendly products & services
- Management & facts > Environment > Circular economy & climate strategy
- Management & facts > Environment > Circular economy & climate strategy > #GreenMagenta Program
- Management & facts > Environment > Resource efficiency in operations
- Management & facts > Environment > Energy consumption & efficiency
- ▶ Management & facts > Economy > Suppliers > Our approach for sustainable procurement
- Management & facts > Economy > Suppliers > Supply chain management
- Management & facts > Economy > Suppliers > Auditing procedures
- Management & facts > Economy > Suppliers > Responsible procurement of raw materials
- Annual Report 2021 > Management report > Technology and innovation

# Principle 10: Work against corruption in all its forms of, including extortion and bribery

- Management & facts > Strategy > CR strategy & managementCR strategy
- Management & facts > Strategy > Compliance
- Management & facts > Strategy > CR strategy & management> Risk and opportunity management
- Management & facts > Economy > Data protection and data security
- Management & facts > Strategy > Political advocacy
- Management & facts > Economy > Suppliers > Our approach for sustainable procurement
- Management & facts > Economy > Suppliers > Supplier compliance
- Management & facts > Economy > Suppliers > Auditing procedures
- www.telekom.com/en/investor-relations/management-and-corporate-governance/reports-and-declarations
- Annual Report 2021 > Management Report > Risk and opportunity management

# **Sustainability Accounting Standards Board** (SASB)

SASB-Code	Requirement	Reference
Environmental Foo	tprint of Operations	
TC-TL-130a.1	(1) Total energy consumed,	Total energy consumption
	(2) percentage gridelectricity,	Renewable energy
	(3) percentage renewable	ESG KPI "PUE" – lower CO <sub>2</sub> consumption in data centers
Data Privacy		
TC-TL-220a.1	Description of policies and practices relating to behavioral advertising and customer privacy	Our approach to data protection     Protection of personal data     Our approach to protection of minors in the media
		Data transparency Telekom (only available in German)
TC-TL-220a.2	Number of customers whose information is used for secondary purposes	Transparency report
		Data privacy Telekom (only available in German)
TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	All relevant legal procedures and outputs are disclosed in the annual report.
		Annual report 2021
TC-TL-220a.4	(1) Number of law enforcement requests for customer information,	Transparency report, from where individual
	(2) number of customers whose information was requested,	countries can also be accessed
	(3) percentage resulting in disclosure	
Data Security		
TC-TL-230a.1	(1) Number of data breaches,	Protection of personal data
	(2) percentage involving personally identifiable information (PII),	
	(3) number of customers affected	
TC-TL-230a.2	Description of approach to identifying and addressing data security risks,	Our approach to data protection
	including use of third-party cybersecurity standards	Cybersecurity
		Risks and opportunities arising from data privacy and data security
		Security dashboard
End-of-Life Manag	ement of Products	
TC-TL-440a.1	(1) Materials recovered through take back programs, percentage of	Used mobile device collection
	recovered materials that were	Waste prevention & recycling
	(2) reused,	Waste volume (including E-Waste)
	(3) recycled, and	ESG KPI "Take Back Mobile Devices"
	(4) landfilled	ESG KPI "Take Back CPEs"

Competitive Behav	riour & Open Internet	
TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulation	All relevant legal procedures and outputs are disclosed in the annual report.  • Annual report 2021
TC-TL-520a.2	Average actual sustained download speed of (1) owned and commercially-associated content and (2) non-associated content	The minimum, normal and maximum download speeds are stated in the product specifications.  Example MagentaZuhause (only available in German)
TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating, and related practice	Strategic risks and opportunities     Risks and opportunities relating to regulation
Managing Systemi	c Risks from Technology Disruptions	
TC-TL-550a.1	(1) System average interruption frequency and (2) customer average interruption duration	Network Reliability
TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	Updating and stabilizing the network architecture     Operational risks and opportunities