

# **CORPORATE RESPONSIBILITY REPORT 2019**

**GRI-INDEX**

**GLOBAL COMPACT  
COMMUNICATION ON PROGRESS**



**LIFE IS FOR SHARING.**

# GENERAL DISCLOSURES

Indicator	Reference	Checked	Indicator	Reference	Checked
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## GRI 102: GENERAL DISCLOSURES

### Organization profile

#### 102-1 Name of the organization

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

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

There were no prohibitions on products and/or services in any countries in 2019.

#### 102-3 Headquarters

- Publishing information > <https://www.cr-report.telekom.com/site20/publication-details>

#### 102-4 Countries where the organization operates

- [www.telekom.com/worldwide](http://www.telekom.com/worldwide)

#### 102-5 G4-7 Nature of ownership and legal form

- Group profile > <https://www.telekom.com/en/company/at-a-glance>

#### 102-6 Markets served

- [www.telekom.com/worldwide](http://www.telekom.com/worldwide)
- <https://report.telekom.com/annual-report-2019/>
- 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
- 2019 Annual Report: Deutsche Telekom at a glance > <https://report.telekom.com/annual-report-2019/management-report/deutsche-telekom-at-a-glance.html>

#### 102-8 Total workforce

- Management & facts > Social > Headcount and part-time work

In Germany, 14 percent of employees under collective agreements and 18.5 percent of civil servants at Deutsche Telekom took advantage of part-time models (as at December 31, 2019). In addition, a total of 29 executives throughout Germany were working part-time (as at December 31, 2019).

#### 102-9 Supply chain

- Management & facts > Economy > Suppliers > Supply chain management

#### 102-11 Precautionary Principle

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
- Management & facts > Strategy > CR strategy & management > ESG key performance indicators

#### 102-12 External charters, principles or other initiatives

- Management & facts > Strategy > Sustainability standards > Global Compact Communication on Progress
- Management & facts > Strategy > Sustainability standards > German Sustainability Code
- 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 and advocacy organizations

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

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.

- Management & facts > Strategy > Political advocacy

### Strategy and analysis

#### 102-14 Statement of the Board of Management

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

#### 102-15 Impacts, risks and opportunities

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

Indicator Reference Checked

**Ethics and integrity**

**102-16 Values, principles, standards and norms of behavior**

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

**102-17 Internal and external procedures on ethical and lawful conduct and procedures for reporting concerns regarding non-ethical or unlawful conduct**

- 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

**102-19 Delegating authority**

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

**102-20 Responsibility for sustainability topics**

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

**102-24 Selection processes for the highest governance body and its committees**

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.

**Stakeholder engagement**

**102-40 Stakeholder groups engaged**

- Management & facts > Strategy > Materiality > Material sustainability topics: systematic process
- Management & facts > Strategy > Stakeholder management > Formats for stakeholder engagement

**102-41 Employees covered by collective bargaining agreements**

Collective bargaining plays an important role and has a long tradition at our company, a fact made clear by the percentage of employees covered by collective agreements. As of December 31, 2019, some 73.4 percent of employees in Germany were covered by collective agreements. Group-wide this number was 52.3 percent.

**102-42 Identification and selection of stakeholders**

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

Indicator Reference Checked

- 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.

**102-43 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 by stakeholders**

- Management & facts > Strategy > Materiality > Material sustainability topics: systematic process

**Identified material aspects and boundaries**

**102-45 Entities included in the consolidated financial statements**

- [www.telekom.com/worldwide](http://www.telekom.com/worldwide)

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

- Management & facts > Strategy > Materiality > Key issues for sustainable business development
- Management & facts > Strategy > Materiality > Material sustainability topics: systematic process
- Management & facts > Strategy > Materiality > Material topics matched with GRI aspects

**102-47 List of Material Topics**

- Management & facts > Strategy > Materiality > Key issues for sustainable business development
- 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.

**102-49 Changes in Reporting**

There were no changes in reporting in the reporting period.

**Report profile**

**102-50 Reporting period**

- About this report

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

- About this report

Indicator	Reference	Checked
	102-52 Reporting cycle	
	> About this report	
	102-53 Contact point for questions regarding the report	
	> About this report	
	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	

# TOPIC-SPECIFIC STANDARDS

Indicator Reference Checked Indicator Reference Checked

## GRI 203: INDIRECT ECONOMIC IMPACTS

### GRI 103: Management Approach

103-1 103-2 103-3 Explain why the topic is material and provide its boundary. Explain how the organization manages the topic. Explain how the organization evaluates the management approach.

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

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

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

## GRI 204: PROCUREMENT PRACTICES

### GRI 103: Management Approach

103-1 103-2 103-3 Explain why the topic is material and provide its boundary. Explain how the organization manages the topic. 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 raw materials sourcing

#### 204-1 Proportion of spending on local suppliers at significant locations of operation

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.

## GRI 205: ANTI-CORRUPTION

### GRI 103: Management Approach

103-1 103-2 103-3 Explain why the topic is material and provide its boundary. Explain how the organization manages the topic. Explain how the organization evaluates the management approach.

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

#### 205-1 Total number and percentage of operations assessed for risks related to corruption and the significant risks identified

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

1. 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)
2. 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.
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 2019, the CRA included 80 companies and thus covered around 97 percent (based on the number of employees).

#### 205-2 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 classroom 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.

Indicator Reference Checked

**E-learning training in Germany**

In 2019, more than 22,000 employees in high-risk positions (sales, procurement) in Germany completed the anti-corruption e-learning course; around 3,800 employees received a certificate for completing a compliance e-learning course; 41,000 employees participated in an e-quiz on gifts, and 609 employees took the e-learning course on consultant services. A total of 569 employees completed the e-learning training on anti-trust law.

**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.

**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. The total number of sanctioned incidents of corruption is confidential.

**GRI 301: MATERIALS**

**GRI 103: Management Approach**

103-1 103-2 103-3 Explain why the topic is material and provide its boundary. Explain how the organization manages the topic. 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 management & recycling > Used mobile device collection
- Management & facts > Environment > Waste management & recycling > Deutsche Telekom’s Used Mobile Device Collection ESG KPI

Indicator Reference Checked

**GRI 302: ENERGY**

**GRI 103: Management Approach**

103-1 103-2 103-3 Explain why the topic is material and provide its boundary. Explain how the organization manages the topic. Explain how the organization evaluates the management approach.

- Management & facts > Environment > Climate strategy > Our approach to measuring our progress in climate protection
- Management & facts > Environment > Energy consumption & efficiency > Our approach to energy-efficient networks
- Management & facts > Environment > Energy consumption & efficiency > Energy efficiency in buildings
- Management & facts > Environment > Mobility > Our strategy for climate-friendly mobility

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

- Management & facts > Environment > Energy consumption & efficiency > Total energy consumption indicator

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 > Energy Intensity ESG KPI

**GRI 305: EMISSIONS**

**GRI 103: Management Approach**

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary. Explain how the organization manages the topic. Explain how the organization evaluates the management approach.

- Management & facts > Environment > Climate strategy > Climate strategy
- Management & facts > Environment > CO<sub>2</sub>emissions > Scope 3 emissions along the value chain
- Management & facts > Economy > Sustainable and innovative products > Our approach to sustainable products and services

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



- Management & facts > Environment > CO<sub>2</sub>emissions > Carbon Intensity ESG KPI
- Management & facts > Environment > CO<sub>2</sub>emissions > Total CO<sub>2</sub>emissions (Scope 1 & 2 emissions)

**305-2 Indirect GHG emissions (Scope 2)**



- Management & facts > Environment > CO<sub>2</sub>emissions > Carbon Intensity ESG KPI
- Management & facts > Environment > CO<sub>2</sub>emissions > Total CO<sub>2</sub>emissions (Scope 1 & 2 emissions)

Indicator	Reference	Checked
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305-3	Other indirect GHG emissions (Scope 3)	✓
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Management & facts > Environment > CO<sub>2</sub>emissions > Total CO<sub>2</sub>emissions (Scope 3)

305-5 Reduction of GHG emissions

Management & facts > Environment > Climate strategy  
 Management & facts > Environment > Our environmental program > We care for our planet

## GRI 401: EMPLOYMENT

### GRI 103: Management Approach

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary. Explain how the organization manages the topic. Explain how the organization evaluates the management approach.

Management & facts > Social > Training and development > Our approach to training and development  
 Management & facts > Social > Fluctuation & staff restructuring > Staff restructuring in a socially responsible way  
 New way of working > New world of work page

401-1 New employee hires and employee turnover

Management & facts > Social > Headcount and part-time work > Development of headcount worldwide  
 Management & facts > Social > Fluctuation & staff restructuring > Staff churn rate  
 Management & facts > Social > Fluctuation & staff restructuring > Share of civil servants in the Group workforce  
 Management & facts > Social > Fluctuation & staff restructuring > Staff restructuring in a socially responsible way

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 402: LABOR/MANAGEMENT RELATIONS

### GRI 103: Management Approach

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary. Explain how the organization manages the topic. Explain how the organization evaluates the management approach.

Management & facts > Social > Employee relationships > Our approach to employee relationships

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 oper-

Indicator	Reference	Checked
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ational 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, 103-2, 103-3 Explain why the topic is material and provide its boundary. Explain how the organization manages the topic. Explain how the organization evaluates the management approach.

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

403-1 Workers representation in formal joint management-worker health and safety committees

We have created different steering levels at Deutsche Telekom in Germany to implement our occupational health and safety management activities.

- The first level is the Central Health Working Group, comprised of employer representatives from the Group and Group companies as well as employee representatives, occupational health and safety experts, and representatives of employees with disabilities.
- The second level comprises the Health Working Groups at Deutsche Telekom subsidiaries in Germany.
- The third level is comprised of local, on-site working groups responsible for implementing occupational health and safety management locally; there are at least 110 of these.

The national companies are responsible for their own occupational health and safety management. However, all Deutsche Telekom employees have gradually been included in a certified health, safety, and environmental management system based on the international standards ISO 45001 for occupational health and safety and ISO 14001 for environmental management that safeguards Group-wide standards. One hundred percent of our employees in Germany and 99 percent of our employees outside of Germany have occupational health and safety and environmental protection certificates (as at December 31, 2019).

403-2 Types of injury and rates of injury at the organization

Management & facts > Social > Occupational health and safety > Health rate  
 Management & facts > Social > Occupational health and safety > Work accidents in Germany

Indicator Reference Checked

**GRI 404: TRAINING AND EDUCATION****GRI 103: Management Approach**

103-1 103-2 103-3 Explain why the topic is material and provide its boundary. Explain how the organization manages the topic. 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 by gender and by employee category

**Vocational training (Group in Germany)**

	Total hours in 2019	Female	Male
Apprentices	6,515,440*	2,215,360*	4,300,080*
Students on cooperative study programs	3,307,216*	926,440*	2,380,776*
Total	9,822,656*	3,141,800*	6,680,856*

(\* Calculations based on average values.)

**Training (Group, international)**

Our employees around the globe spent some four million hours on training and skills development in 2019, 46 percent of them in digital format, which is 5 percent more than in 2018. Most of our courses can now be booked through a global Learning Management System (LMS); in 2019, 60 percent of the training courses bookable via LMS were digital.

Telekom Training continuing education program  
Apprentices and vocational training programs

404-2 Programs for upgrading employee skills and transition assistance programs

Programs for lifelong learning

➤ Management & facts > Social > 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. In many cases, the job change can be accompanied by financial incentives. In 2019, as in previous years, Vivento's job portal [www.interamt.de](http://www.interamt.de) offered civil servants appropriate posts at national, regional, and local level.

The Post/Telekom welfare service offers seminars on "Getting ready for retirement" in which Deutsche Telekom employees are invited to participate. Participants work on ways in which they will be able to fill their retirement years with meaningful activities and enjoy their retirement for years to come.

➤ Management & facts > Social > Training and development > Telekom Training continuing education program

➤ Management & facts > Social > Employee relationships > Flexible working models for a wide range of needs at Deutsche Telekom in Germany

Indicator Reference Checked

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
- "Lead2Win" for managers in executive positions worldwide, employees not covered by collective agreements in Germany, and employees of national companies
- PPR4ALL (Performance & Potential Review) in T-Systems International countries

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. 67,000 employees (81 percent of target group)
- Lead2Win: number and proportion to be determined in Q1 2020, process period > 12 months
- Performance & Potential Review (T-Systems International): approx. 16,000 employees (91 percent of target group)

In each case, the performance management tools apply for entire employee groups and therefore employees of any gender in equal measure.

**GRI 405: DIVERSITY AND EQUAL OPPORTUNITIES****GRI 103: Management Approach**

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary. Explain how the organization manages the topic. 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: Percentage of individuals within the organization's governance bodies in each of the following diversity categories: gender, age group, other indicators of diversity where relevant (such as minority or other vulnerable groups)

- Management & facts > Social > Diversity > Commitment to increasing the proportion of women
- Management & facts > Social > Diversity > People with a disability
- Management & facts > Social > Demography and company pension scheme > Age structure

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.



Indicator Reference Checked

**405-2 Ratio of basic salary and remuneration of women to men**

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) confirmed that women and men who do the same job receive the same pay. It was not possible to record the pay of our male and female 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, 103-2, 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., Explain how the organization evaluates the management approach.

- Management & facts > Social > Human rights > Our approach to protecting human rights
- 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

**GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING****GRI 103: Management Approach**

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., Explain how the organization evaluates the management approach.

- Management & facts > Social > Human rights > Our approach to protecting human rights
- 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, and corrective actions taken**

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.

Indicator Reference Checked

**GRI 409: FORCED OR COMPULSORY LABOR****GRI 103: Management Approach**

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., 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
- Good stewardship > Supply Chain > Supply chain page
- Management & facts > Economy > Suppliers > Our approach to sustainable procurement
- Management & facts > Economy > Suppliers > Improving sustainability in the supply chain

**409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor, and corrective actions taken**

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.

**GRI 412: HUMAN RIGHTS ASSESSMENT****GRI 103: Management Approach**

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., Explain how the organization evaluates the management approach.

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

**GRI 414: SUPPLIER SOCIAL ASSESSMENT****GRI 103: Management Approach**

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., Explain how the organization evaluates the management approach.

- 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 > 2019 audit results

Indicator	Reference	Checked
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#### 414-1 New suppliers that were screened using social criteria

In 2019, compliance with social and environmental criteria was verified for 81 percent of our suppliers. This also covers human rights criteria. This verification will also be carried out for all future suppliers. Of our 200 most important suppliers in terms of procurement volume, we verified compliance with sustainability criteria (CR-Qualified TOP 200 Suppliers ESG KPI) for 87 percent in 2019.

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

- Management & facts > Economy > Suppliers > 2019 audit results

### GRI 416: CUSTOMER HEALTH AND SAFETY

#### GRI 103: Management Approach

103-1 103-2, 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., 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 secure mobile communication
- Management & facts > Economy > Sustainable and innovative products > 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 > Major ongoing litigation

### GRI 418: CUSTOMER PRIVACY

#### GRI 103: Management Approach

103-1 103-2 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., Explain how the organization evaluates the management approach.

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

#### 418-1 Substantiated complaints regarding breaches of customer privacy and losses of customer data

- Management & facts > Strategy > Compliance > Major ongoing litigation

Indicator	Reference	Checked
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### GRI 419: SOCIOECONOMIC COMPLIANCE

#### GRI 103: Management Approach

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., 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 > Major ongoing litigation

# FURTHER GRI ASPECTS REPORTED

Indicator Reference Checked

## GRI 201: ECONOMIC PERFORMANCE

### GRI 103: Management Approach

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., Explain how the organization evaluates the management approach.

➤ Group profile > <https://www.telekom.com/en/company/at-a-glance>

201-1 Direct economic value generated and distributed

➤ Management & facts > Economy > Financial performance indicators > Net added value

201-3 Defined benefit plan obligations

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

## GRI 306: EFFLUENTS AND WASTE

### GRI 103: Management Approach

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., Explain how the organization evaluates the management approach.

➤ Management & facts > Environment > Circular economy & resource efficiency > Our approach to resource conservation and environmental protection

➤ Management & facts > Environment > Our environmental program > We care for our planet

➤ Management & facts > Environment > Waste management & recycling > Waste reduction and recycling

306-2 Waste by type and disposal method

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. We also use our Used Mobile Device Collection ESG KPI to determine the relationship between the number of mobile devices such as smartphones and tablets brought to market and the number returned to us (returned mobile devices in thousands / number of mobile devices brought to market in millions). Functional devices are reused, which gives them a longer life span. Cell phones that are no longer functional are properly recycled in an environmentally friendly manner. 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.

Indicator Reference Checked

We comply with all legal requirements in all countries when disposing of hazardous waste.

We are a service provider with low amounts of effluents as a result. We don't collect data on effluents, as the amount of time and work involved could not be reasonably justified based on the benefit this would bring.

## GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT

### GRI 103: Management Approach

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., 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 > 2019 audit results

308-1 Percentage of new suppliers that were screened using environmental criteria

In 2019, compliance with social and environmental criteria was verified for 81 percent of our suppliers (Sustainable Procurement ESG KPI). This verification will also be carried out for all future suppliers. Of our 200 most important suppliers in terms of procurement volume, we verified compliance with sustainability criteria (CR-Qualified TOP 200 Suppliers ESG KPI) for 87 percent in 2019. In addition, 63 percent of our purchases from emission-intensive suppliers were covered by the CDP Supply Chain Program (CDP Supply Chain Coverage ESG KPI) in 2019.

308-2 Significant actual and potential negative environmental impacts in the supply chain and actions taken

➤ Management & facts > Economy > Suppliers > 2019 audit results

## GRI 408: CHILD LABOR

### GRI 103: Management Approach

103-1, 103-2, 103-3 Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., 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 > 2019 audit results

Indicator	Reference	Checked
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408-1	Operations and suppliers at significant risk for incidents of child labor, and corrective actions taken	
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➤ Management & facts > Economy > Suppliers > 2019 audit results

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

## GRI 415: PUBLIC POLICY

### GRI 103: Management Approach

103-1, 103-2, 103-3	Explain why the topic is material and provide its boundary., Explain how the organization manages the topic., Explain how the organization evaluates the management approach.	
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➤ 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 & management > Values 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
- 2019 Annual Report > Management report > Employees
- 2019 Annual Report > Management report > Group strategy
- 2019 Annual Report > 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 & management > Values 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 & 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 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
- 2019 Annual Report > Management report > Employees
- 2019 Annual Report > To our shareholders > Corporate Governance Report

### 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 > Climate strategy
- Management & facts > Environment > Our environmental program > We Care for our Planet
- Management & facts > Environment > Circular economy & resource efficiency
- 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 > 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
- Management & facts > Environment > Additional ecological information > Additional ecological information
- 2019 Annual Report > 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 > Climate strategy
- Management & facts > Environment > Our environmental program > We Care for our Planet
- Management & facts > Environment > Circular economy & resource efficiency
- Management & facts > Environment > Energy consumption & efficiency
- Management & facts > Environment > Additional ecological information > Protecting biodiversity
- Management & facts > Environment > Circular economy & resource efficiency > Our approach to resource conservation and environmental 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 > Economy > Suppliers > Responsible procurement of raw materials
- Specific absorption rate  
<https://www.telekom.de/hilfe/geraete-zubehoer/handy-smart-phone-tablet/allgemein/sar-werte?samChecked=true>
- Annual Report 2019 > 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 > Circular economy & resource efficiency > Our approach to resource conservation and environmental protection
  - Management & facts > Environment > Climate strategy
  - Management & facts > Environment > Our environmental program > We Care for our Planet
  - Management & facts > Environment > Circular economy & resource efficiency
  - 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 2019 > Management report > Innovation and product development

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

- Management & facts > Strategy > CR strategy & management > CR 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
- 2019 Annual Report > To our shareholders > Corporate Governance Report
- 2019 Annual Report > Management Report > Risk and opportunity management