

# GROUP POLICY ON CORPORATE RESPONSIBILITY

## Summary

The Group Policy on Corporate Responsibility defines Deutsche Telekom's corporate responsibility (CR) concept and the areas affected by CR regulations within the Group. The Group Policy on CR specifies the general framework for activities that the Group applies on the basis of various political, economic, and cultural conditions. The key success factor when it comes to firmly establishing and further developing CR is the interaction between the specified Group standards, the central governance bodies and instruments, and the individual CR initiatives and measures in the national companies and business areas.

## PREAMBLE

When it comes to meeting the ecological (“environment”) and society-related (“social”) challenges of our times, international companies are expected to take responsibility, and to firmly establish and implement this undertaking as appropriate in the structures and processes of the business as a whole (“governance”). In order to fulfill their social responsibility as good corporate citizens on a global level, companies should therefore define criteria for their activities that go beyond what is prescribed by national standards and legislation. The Deutsche Telekom Group is fully aware of this responsibility. As an international provider of information and communication technology (ICT), the company has an impact on the work and lives of selected interest groups (referred to below as stakeholders) on a day-to-day basis – a fact that results in a particular obligation.

## OBJECTIVE OF THIS GROUP POLICY

The Group Policy on Corporate Responsibility defines Deutsche Telekom’s corporate responsibility (CR) concept and the areas affected by CR regulations within the Group. The Group CR Policy specifies the general framework for activities that the Group applies on the basis of various political, economic, and cultural conditions. The key success factor when it comes to firmly establishing and further developing CR is the interaction between the specified Group standards, the central governance bodies and instruments, and the individual CR initiatives and measures in the national companies and business areas.

This Group Policy is intended to serve as a basis for the company to define, implement, keep track of, and further develop the CR responsibilities and obligations associated with the Group, and with its tasks and coordination processes. That makes it possible to document performance and progress, identify potential for improvement, and optimize the focus of CR measures on social challenges and priorities. It also means taking on a long-term pioneering role with the aim of becoming the leading global, digital, and sustainable telco.

The CR governance structure is described in this policy as a basis for successful CR management. It specifies areas of responsibility and tasks, together with forms of cooperation between the individual CR bodies and Group headquarters, and also between the national companies and business areas. Further structural details can be specified through regulations outside of this Group Policy.

## ADDRESSEES AND SCOPE OF THIS GROUP POLICY

This Group Policy applies to the Deutsche Telekom Group worldwide, insofar as the responsible board of management / managing board or the responsible member thereof has approved its validity for their company. Responsibility for implementing this Group Policy lies with the responsible board of management / managing body and/or the responsible member thereof. This Group Policy is addressed to all Group employees.

When implementing this Group Policy, the precedence of national, international, and supranational law and cultural norms in place within this framework, as well as – where relevant – existing collectively agreed regulations and the participation rights of the employee representatives responsible, shall be observed.

## OUR UNDERSTANDING OF CR – DEFINITION AND SCOPE

In our view, corporate responsibility goes beyond complying, as a matter of course, with national and international legal requirements and regulations, such as the German Supply Chain Due Diligence Act (LkSG) and health & safety or environmental protection laws, and beyond implementing socially acceptable standards, such as OECD guidelines, through the assumption of corporate responsibility.

It means accepting Deutsche Telekom's corporate responsibility toward society. Based on the ESG (environmental, social, and governance) framework and throughout the Group's entire value chain, Deutsche

Telekom addresses, in particular, the aspects of responsible corporate governance, dealings on the financial market and with our suppliers, empowering our customers to adopt sustainable practices, resource and energy efficiency, the circular economy, climate and environmental protection, biodiversity, and – last but not least – social and digital responsibility.

The Group maintains an ongoing dialog with its stakeholders for this purpose.

Deutsche Telekom's Board of Management expressly underlines the importance of CR and its commitment in this regard. In its business mandate, the Board of Management defines goals and obligations that are the responsibility of the CR unit at Group headquarters and are to be implemented by all business areas / segments throughout the Group and, based on these, by all subsidiaries and national companies.

Deutsche Telekom's objective is to use its CR strategy as a basis for taking on a pioneering role as a company that acts responsibly in the international competitive environment. To this end, and within the framework of the relevant local legislation, the Group is committed to the following goals:

- Being a major driving force for sustainable practices at national and international level
- Adopting sustainable practices throughout the entire value chain and helping to meet environmental, economic, and social challenges
- Setting standards for connected life and work, and enabling a sustainable lifestyle in a digital world
- Setting a good example when it comes to integrating people into the information society, and enabling safe and confident use of the opportunities of digitalization
- Playing a leading role in shaping a climate-friendly and resource-efficient society
- Exercising an appropriate duty of care in respect of human rights and the environment with the aim of preventing or minimizing any risks to human rights or the environment that may arise through our business activities, and putting an end to any human rights or environmental violations

This policy uses the term “corporate responsibility” in reference to those parts of the ESG (environment, social, and governance) framework that are not the responsibility of dedicated organizational units within the Group. In particular, the following areas are not covered by the regulations of this Group Policy but by separate policies and regulations:

- Diversity, equity, and inclusion of employees
- Employee relations (through employee representatives)
- Equal pay
- Data security (including cybersecurity)
- Data privacy
- Prevention of corruption
- Risk management
- management system for the German Supply Chain Due Diligence Act (LKSG)
- Specifications for the inclusion of Group departments and bodies with regard to measures that are of relevance to the Group (e.g., Group Policy on Value Thresholds)

In terms of the Group CR Policy and the CR organization, these areas form part of the reporting and the key stakeholder dialogs that fall under the responsibility of the CR department (CR Report, CR ratings and rankings, non-financial statement (NFS), and the associated subsequent regulations).

## **BODIES, DEPARTMENTS, AND ROLES AND THEIR RESPONSIBILITY**

### **GROUP BODIES AND THEIR RESPONSIBILITY**

With its CR governance structure, Deutsche Telekom ensures sustainability-relevant topics are incorporated into business processes.

Deutsche Telekom’s Board of Management has overall responsibility for CR at Group level and regularly reports on CR to the Supervisory Board. It delegates strategic and specialist responsibility to the Group Corporate Responsibility (GCR) department. The Board of Management departments and business areas (segments) – and, based on these, the subsidiaries and national companies – develop and implement their own CR measures in accordance with the Group’s CR strategy. Responsibility for sustainable and good corporate governance at the level of each respective entity lies with the relevant managing board, in the same way as with the arrangements for the Group as a whole. This ensures CR-relevant topics and any monitoring functions arising from legal requirements are firmly established at corporate level. The Controlling department and the Group’s Shared Services assist GCR with reporting, monitoring processes relating to goal attainment for defined measures, and the measurement of quantitative management indicators. They also act as a monitoring body for

GCR as regards the data quality of the KPIs (key performance indicators) to be recorded.

<b>Supervisory Board of Deutsche Telekom AG</b>				
Receives regular information about ESG strategy, implementation, and key figures.				
<b>Group Board of Management</b>				
Adopts Group-wide ESG regulations and strategic specifications, and receives regular updates from the business areas about their status and progress in implementing the ESG strategy and goals.				
<b>Group Corporate Responsibility (GCR)</b>		<b>CR Controlling &amp; Data Expertise</b>	<b>Departments</b>	<b>DTSE</b>
Central competence center focusing on strategy, strategic policies and projects, specialist and procedural advice, external reporting, and stakeholder management.		CR Controlling defines and implements the ESG data model together with GCR, is responsible for operational controlling of quantitative targets and KPIs across the various levels of the Group and evaluates the economic effect of strategic CR decisions Data Experts support segments/legal entities where necessary in the collection, structured input, and evaluation of KPIs	Responsible for firmly establishing sustainability in their topics and tasks as well as reporting this in accordance with the requirements for reporting, ratings, and rankings. Depending on the scope of tasks, roles can be developed here along the lines of CR management and/or CR controlling.	Collects and consolidates ESG KPIs globally and ensures the quality and completeness of the data collected.
<b>Segment Leads/Managing Boards</b>	<b>CR Segment Lead</b>			
Responsible for implementing strategy, specifications, and goals in the segment, reporting on this to the Group Board of Management, and fleshing out CR governance based on business requirements.	Central point of contact in the segment for CR issues, adapts the CR strategy to the requirements of the segment, coordinates CR activities.			
<b>Managing Boards of Legal Entities</b>	<b>CR Management</b>			
Responsible for implementing strategy, specifications, and goals in the legal entity, reporting on this to their own segment. and fleshing out CR governance based on business requirements.	Central point of contact in the legal entity for CR issues, leading CR activities within the unit's governance structure.			
<b>CR Board</b>				
Group-wide body advising on CR strategy development, agreeing Group-wide positions, and coordinating implementation of the CR strategy in the Group units.				
<b>CR Management Network</b>				
Group-wide platform for all staff responsible for CR in segments, legal entities, and functions, for the purpose of sharing know-how and experience and ensuring information is passed on quickly and directly.				
<b>Communities</b>				
Informal platforms to encourage and coordinate sustainability-related volunteering.				

Fig. 1: Overview of CR governance

## Deutsche Telekom Board of Management

The Deutsche Telekom Board of Management sets the overarching strategic guardrails and targets relating to the Group's sustainability. It is the driving force behind their further development, represents Deutsche Telekom's interests where corporate responsibility issues are of relevance to the entire Group, and regularly reports to the Supervisory Board.

In its schedule of responsibilities, the Supervisory Board has assigned responsibility for CR to the department of CEO. Within the framework of its business mandate, the Board of Management has delegated Group-wide strategic and specialist responsibility to GCR.

The Board of Management delegates responsibility for business-specific CR to the segments / business areas and has the management teams of these segments / business areas regularly report to it on the implementation status of CR goals.

## Global CR Board

The global CR Board is not a decision-making body but acts as a central body providing information, advice, and recommendations. In this way, it helps implement both the CR strategy and the Group goals and measures deriving from this strategy.

The global CR Board must at least include the staff responsible for CR in the Group segments, a representative responsible for central functions relating to ESG, and GCR management. The body can add further members, as required, and offers a high level of pooled specialist expertise for further development and implementation of the CR strategy. The global CR Board meets regularly to discuss the latest CR developments in the Group. Supported by GCR, the individual members take CR topics and their expertise to the respective departments for which they are responsible. In this way, they enable Group-wide implementation of CR affairs.

The global CR Board's responsibilities include preparing strategic and specialist recommendations for GCR on the following topic areas:

- CR strategy, its focal points, and implementation
- Goals and key figures, the CR program, and implementation of the Group Policy on Corporate Responsibility
- Measures to continue firmly establishing CR in the Group
- Current and future challenges for CR

The global CR Board's meetings are prepared, chaired, and followed up on by GCR. Terms of reference to be drawn up by the global CR Board define the specific structure of this body's work.

## CR Management Network

Basically speaking, all employees involved in CR management, CR segment leads, CR segment controllers, responsible CR data experts, and other Group employees nominated by GCR to be responsible for CR belong to the global CR Management Network. GCR establishes and maintains the global CR Management Network, which serves to ensure a shared understanding of the goals and measures of Deutsche Telekom's sustainability strategy, the direct transfer of information, and the exchange of experience.

The global CR Management Network can also meet in segment-specific and/or regional subgroups to discuss segment-specific topics. In such cases, the respective CR segment lead is responsible. Where appropriate, GCR can additionally include representatives of voluntary sustainability-related communities in the global CR Management Network.

## Communities and voluntary initiatives

We are not looking to achieve the goal of making Deutsche Telekom the leading global, digital, and sustainable telco solely through the company's formal structures and processes. We explicitly wish to encourage and

support communities and initiatives based on voluntary commitment. Successful examples include the Green

Pioneers community and the initiative to digitalize schools.

GCR does everything it can to support employee initiatives that lend themselves to promoting Deutsche Telekom's strategic sustainability goals both internally and externally. This includes incorporating them into communication and information activities, along with regular active dialog on sustainability topics.

## GROUP CORPORATE RESPONSIBILITY (GCR)

Group Corporate Responsibility (GCR) is responsible for devising and developing the Group's CR strategy, and for deriving goals and initiatives for its implementation at Group level. GCR has the task of incorporating key elements of corporate responsibility into the Group strategy and processes within the Group.

It also acts as the competence center for corporate responsibility topics. GCR ensures the latest know-how and expertise relating to both internal and external developments is available and passes this on to the Group through consulting, communication, and needs-based training.

In addition, GCR enables the business areas and Group companies to implement goals and measures resulting from the CR strategy in the individual Group companies – adapted to local circumstances and applicable provisions/regulations.

GCR is the Group's official representative for all CR issues and the central interface between the CR bodies referred to in this policy. It coordinates and manages implementation of the CR strategy, along with Group-wide objectives and activities, in close coordination with the staff responsible for CR in the segments and legal entities. This also includes monitoring goal attainment. If discrepancies are identified between the target and actual situation, GCR initiates appropriate measures in the areas concerned.

GCR regularly informs the Board of Management about relevant developments relating to CR. Furthermore, it is responsible for initiation and central management of the regular dialog with external experts and stakeholders.

GCR's specific tasks are defined in its business mandate.

## Environment, climate protection, circular economy, and resource/energy efficiency

Below Board of Management level, overall responsibility for the Group-wide climate strategy lies with GCR. The function of Climate Change Officer has been created for this purpose. The climate strategy covers efforts to limit CO<sub>2</sub> emissions (mitigation) as well as adapting to the consequences

of climate change (adaptation) throughout the Group's entire value chain. It also includes the Group's portfolio of solutions to help our customers lower their CO2 emissions (enablement).

GCR is responsible for the expert and qualitative assessment of appropriate offsetting measures. It advises the segments on the necessary quantities and potential measures.

ESG-based issues relating to resource and energy efficiency, including circularity, waste avoidance, and waste treatment, also lie within GCR's area of responsibility.

Furthermore, GCR is responsible for identifying and monitoring other relevant environmental topics. To this end, it is a member of various working groups of appropriate national and international industry associations and is

in constant dialog with further relevant stakeholders (politicians, NGOs, customers, etc.). Particular topics identified in this connection include water consumption and protecting biodiversity.

## Social responsibility and digital participation

Deutsche Telekom aims to enable people – regardless of their age, ethnicity, gender, LGBTQIA+ status, nationality, physical and mental capabilities, religion and faith, and social background – to realize their professional and personal potential by benefiting from the internet's educational, networking, work-related, and cultural infrastructure and offerings.

Ever more areas of our lives are managed digitally, and the digital world has long since become a reality of life. Digital participation therefore also means social participation.

Deutsche Telekom champions a digital society based on equal opportunities in which every individual has access to the necessary technology and offerings. These should cater to people's capabilities, skills, and preferences, but also to their financial means. Furthermore, the company helps ensure people are willing and able to participate and act responsibly online. That includes fair, tolerant, and respectful interaction in the digital world.

## Human rights

Deutsche Telekom strives to exercise due regard to prevent or minimize any risks to human rights or the environment that may arise through its business activities, and to put an end to any human rights or environmental violations. These efforts are based on internationally recognized norms, guidelines, and standards.

In exercising this overall responsibility, GCR:

- Defines the Group's human rights strategy
- Ensures and monitors implementation of an appropriate and due diligence system for human rights risks in the Group in the area of application of this CR Policy
- Collaborates with the established governance functions for Group procurement activities in developing appropriate measures to further the implementation of the human rights strategy in supplier management

The Group companies and other Group governance functions ensure the human rights strategy is implemented within their area of responsibility.



## Focus on customers and products

Customers are increasingly factoring in environmental, social, and ethical aspects when making their purchasing decisions. In order to stand out from its competitors, Deutsche Telekom is looking to use sustainability arguments to improve customer satisfaction.

GCR is tasked with using all kinds of sources to assess the importance of sustainability when it comes to products and services, and with developing both strategic recommendations and basic specifications.

GCR helps the Group's departments conceptualize and market holistic, sustainable products, services, and solutions that meet a combination of climate, circular economy, and resource conservation requirements. It does so by establishing approaches such as product-based labeling to provide private and business customers with guidance on sustainability – or the sustainability-specific impact of products, services, and solutions – when they are making their purchasing decisions.

## Financial market

As a global player, Deutsche Telekom's primary objective is to generate sustainable added value. The Group is committed to continuously increasing the proportion of socially responsible investors. The company is therefore aiming to become much more attractive to such investors by featuring in sustainability indices and achieving good ESG rating and ranking results.

GCR is responsible for coordinating, prioritizing, and consolidating all inquiries from CR-relevant ESG rating agencies. It collaborates closely with Investor Relations and Corporate Communications to manage such rating approvals. Rating results are analyzed by GCR, communicated inside and outside the company, where appropriate, and used as a basis for further recommendations. GCR supports Investor Relations and, if appropriate, Group Treasury in their direct and indirect contacts with investors – at investor roadshows and trade shows, for instance, or on the basis of specific inquiries – to increase public awareness of the T-Share as a sustainable investment.

## Reporting, documentation, monitoring, and controlling

GCR is responsible for the content of internal and external reporting on CR-relevant issues that are of importance for the Group. This includes, in particular, comprehensive annual CR reporting to internal and external stakeholders that meets all legal, regulatory, and further requirements, such as those of investors.

CR data from the business areas (segments) and legal entities is requested, input, documented, and monitored in an information system at clearly defined intervals. All key CR specifications, such as CR standards and policies, are communicated internally to employees.

As far as possible, existing structures and systems – especially financial controlling at the various levels of the Group and appropriate Shared Service structures and systems – are used for reporting, documentation, and monitoring. The relevant Shared Service is responsible, in particular, for collecting and consolidating the data, and for selecting and operating the appropriate systems. It must also ensure the completeness and fundamental quality of the data collected.

Furthermore, the Group's Financial Controlling team monitors the Group's CR organizations when it comes to assessing implementation progress and the attainment of the quantitative targets that have been set.

## Internal and external communication

GCR is responsible for the content of internal and external communication on CR-relevant issues that are of importance for the Group. Departments that wish to communicate such content consult GCR to ensure the specific content is compatible with the CR strategy and accurate. Given that coherent communication is vital for avoiding damage to the Group's reputation, this specific consulting requirement is particularly important. If there are no objections on the part of GCR, content can be published via Group Communications or other communication channels.

The Group's communications departments assist GCR in its role by making initiators aware of this regulation prior to publication of content and, in critical cases, by not publishing CR-relevant content without GCR's approval. Local activities and/or CR communications that are not critical for the Group as a whole can be communicated independently by the Group companies and business areas, taking into account the general specifications for communicating CR content.

## GROUP SEGMENTS / BUSINESS AREAS AND THEIR RESPONSIBILITY

Group segments / business areas have the task of adapting the Group CR strategy in accordance with the special features of the respective business model, of implementing this strategy and Group-wide CR specifications and goals in the segment / in their business areas, and of reporting to the Group accordingly. They bear overall responsibility for:

- Implementing the CR organizational structure within the segment, in particular designating central CR coordinators and CR controllers for the segment
- Cascading and overall implementation of CR Group goals in the segment and, if appropriate, their own CR goals
- Complying with statutory and legal requirements in the segment
- Operationalizing the Group CR strategy and implementing it within the scope of their budget authority

Other tasks:

- Increasing employee awareness of the importance of CR and, accordingly, its relevance for the company
- Ensuring regular further development and documentation of all segment-specific aspects of CR
- Providing all content required for qualitative CR reporting, promptly and in full
- In collaboration with the relevant Shared Service, providing all data and key figures required for quantitative CR reporting, promptly and in full, also communicating to GCR information about CR-relevant developments in the regions and the resulting recommendations for a Group-wide CR orientation
- Ensuring independent internal and external communication, and processing inquiries about local CR activities

The segment also delegates part of this overall responsibility and these tasks to assigned, monitored legal entities. In this case, the segment's specific role is to manage, advise, and monitor the legal entities as they exercise their partial responsibility and tasks. Together with GCR, the segment ensures the communication flow between centralized and decentralized roles and aggregates the reporting of the legal entities for segment reporting purposes.

The managing board and/or the leadership team of the respective segment is responsible for the precise arrangements for operational responsibility in the segment / business area. This ensures the relevant arrangements can be adapted to the area-specific requirements. A central contact must always be designated to provide a consolidated overview of the segment / business area and act as a gateway to topics that cover various areas or are not clearly allocated.

The business areas are also obliged to cooperate in the international CR Management Network and the global

CR leadership team, and to advise GCR from the relevant perspective of their segment.

## LEGAL ENTITIES

Group companies are responsible for implementing Group-wide CR specifications and goals at their own company in the form stipulated by the relevant segment for the business model, and also for reporting accordingly to the respective segment and to GCR. They bear responsibility for:

- Implementing the CR organizational structure within the company
- Allocating CR tasks
- Implementing the Group and segment CR goals at the company and, if appropriate, their own CR goals
- Complying with statutory and legal requirements at the company
- Operationalizing and implementing the CR strategy

Other tasks:

- Increasing employee awareness of the importance of CR and, accordingly, its relevance for the company
- Ensuring regular further development and documentation of all segment-specific aspects of CR
- Providing all content required for qualitative CR reporting, promptly and in full
- Providing all data and key figures required for quantitative CR reporting, promptly and in full, also communicating to GCR information about CR-relevant developments in the regions and the resulting recommendations for a Group-wide CR orientation
- Ensuring independent internal and external communication, and processing inquiries about local CR activities

## DEPARTMENTS (FUNCTIONS AT HEADQUARTERS AND/OR WITHIN OTHER SEGMENTS / BUSINESS AREAS)

The departments are responsible for integrating sustainability aspects into the topics and tasks for which they are accountable. To this end, each department must check the sustainability of all such topics and tasks, identifying and addressing any need for action.

If departments are directly affected by overarching CR goals and measures, they are responsible for incorporating the key figures, promptly and in full, into ESG reporting and into the planning and forecasting processes of their own segment and/or legal entity.

In the case of more wide-ranging topics, a CR manager must be designated for the department to act as the first point of contact and the coordinator for all CR issues in the department, and also to provide information in response to content-related queries during the reporting process.

## **COLLABORATION WITHIN THE GOVERNANCE STRUCTURE**

In accordance with GCR's business mandate, its CR strategy provides the framework within which the legal entities and business areas, but also central functions, can conduct their own CR activities and/or are required to conduct these activities on the basis of the CR strategy. GCR advises them on both specialist and process-related issues. The Deutsche Telekom Board of Management decides on Group-wide CR focus topics and projects.

The staff responsible for CR in the individual segments and legal entities are involved as appropriate for implementation purposes. Should the business areas have objections and should difficulties with implementation be identified, more intensive, solution-oriented dialog with the relevant bodies is envisaged. Should a solution not be found within the previously agreed timeframe, the Deutsche Telekom Board of Management is to be involved as the final escalation and decision-making body. The facts of the case and the arguments of the parties involved are then to be prepared as appropriate and presented.

Deutsche Telekom's CR bodies collaborate closely and regularly coordinate on implementing the CR strategy.

GCR routinely informs the Chairperson of the Board of Management and the Deutsche Telekom Board of Management about the current status of Group-wide topics and projects, the Group's CR performance, and implementation of the CR strategy. In addition to this, the segment managing boards regularly report to the Board of Management or to the bodies designated by the Board of Management on status, performance, and the segment-specific CR strategy.

GCR encourages dialog within the global CR leadership team, which establishes a strategic focus and also plays an advisory role.

In terms of external interaction, GCR is responsible for the stakeholder involvement strategy, dialog with stakeholders, and their participation.

## **REVIEW OF THIS GROUP POLICY**

Group Corporate Responsibility shall review the provisions of this Group Policy on Corporate Responsibility after no more than five years in order to establish whether it needs to be amended or adapted, and shall adapt the Group Policy, together with its annexes, if necessary.

## ENTRY INTO FORCE OF THIS GROUP POLICY

In accordance with the resolution by the Deutsche Telekom AG Board of Management on February 14, 2023, this Group Policy shall – subject to the agreement of the codetermination bodies following the involvement of the Group Works Council – enter into force at Deutsche Telekom AG on June 1, 2023 and replace the version dated February 26, 2014.

At the Group companies, this Group Policy shall enter into force according to the resolution of the responsible managing body and/or the decision of the responsible member thereof.

## LOCAL ADJUSTMENTS TO THIS GROUP POLICY

When this Group Policy is implemented in companies outside Germany, the precedence of national and supranational law and the cultural norms within this framework, as well as any participation rights of the responsible or authorized employee representatives, shall be observed.

When implementing this policy, the precedence of national, international, and supranational law and cultural norms in place within this framework, as well as – where relevant – existing collectively agreed regulations and the participation rights of the employee representatives responsible, shall be observed.

Any adjustments required are to be implemented in consultation with Group Corporate Responsibility.

## COMPLIANCE WITH THE RULES OF CONDUCT

Violations of this policy may result in risks of liability and damage to the reputation of Deutsche Telekom and/or its executive bodies. Culpable, willful misconduct shall be punished in accordance with the applicable provisions of the law.

## OTHER APPLICABLE PROVISIONS / ADDITIONAL DOCUMENTS

In addition to this Group Policy, the following documents also provide details explaining corporate responsibility governance:

- Guideline on roles and responsibilities in the Group's segments / business areas and legal units
- CR Governance RACI
- Environmental Policy