

# Diversity, Equity and Inclusion (DE&I) Policy

## Introduction

Diversity, equity and inclusion (DE&I) are essential success factors for companies. As an internationally operating Group, we see the DE&I values as key to our long-term business success and as important elements of our corporate social responsibility.

We support a diverse corporate culture that reflects the various facets of society and thus addresses the different needs of our customers. We build on this diversity to achieve business success, because diverse workforces perform better and are more innovative. This allows us to stand out as an attractive employer and preferred business partner.

“We won’t stop until everyone is connected.”

With this purpose, HT Group as leading telecommunications company in Croatia, we want to meet the essential human need for connection and enable it technologically.

We reflect and strengthen our objective and our Guiding Principles amidst business and social changes, such as worldwide demographic change, globalization, and digitization. In our aspiration also lies the value of inclusion, which illuminates our purpose in a non-discriminatory, holistic and socially sensitive way, building on our long-standing guiding principle, "Act with Respect and Integrity."

Across all diversity dimensions (see 4.1.), HT Group values and promotes the innovative opportunities offered by diverse skills, opinions and ideas. We are committed to a work environment in which these come to fruition and foster a sense of belonging for all employees.

Achieving sustainable change and improvement for the company and its employees requires the full participation and personal accountability of all parties to this Diversity, Equity and Inclusion (DE&I) Policy.

## Addressees and scope of the Policy

This Policy applies to all employees (members of the Board of Management, managing directors, executives as well as all employees of HT Group and persons who are functionally equivalent to employees (such as temporary workers) of HT Group, insofar as the relevant management body or the relevant member of the management has resolved or decided that this Policy applies to his or her company.

## Adaption of the Policy

When implementing this Policy in organizations within HT Group, the respective prevailing national and supranational law and the respective cultural practices as well as - if applicable - the rights of social partners must be observed.

In the implementation, the prevailing and supranational law as well as the existing collective-law regulations and participation rights of the competent employee representation bodies must be observed.

# Diversity, Equity and Inclusion in HT Group

## Definition, Strategies, Goals and Benefits of DE&I

**Diversity** is a term that describes the differences in our workforce based on demographic, personal or societal factors. This includes the diversity dimensions: Age, gender identity and gender expression, people with different physical and mental abilities, nationality, social and ethnic origin, social status, religion and belief, political opinion, health status, sexual identity and sexual orientation.

**Equity** describes the basic attitude that every person should have fair opportunities, access and development possibilities, regardless of individual circumstances.

**Inclusion** describes the way in which we consciously involve different people (employees and others such as customers) in work and decision-making processes and give them a sense of belonging and value within our organization.

We are changing the game: for us, DE&I is a concept that aims to make a significant contribution to the business success of HT plc and each HT Group organization through the recognition, appreciation, inclusion, fair treatment and promotion of our diverse individual stakeholders (employees, shareholders, customers, suppliers).

By recognizing and promoting the diversity of our workforce, we at HT Group strive to live and strengthen DE&I as part of our corporate culture. We also see ourselves as an active member of society and take responsibility when it comes to social issues. That is why we use our power to shape change in the areas we operate in and are committed to foster an open, diverse, digitally and physically inclusive and equal society.

## Recognition of Diversity

HT Group recognizes the aforementioned diversity dimensions and takes them fully into account when implementing the DE&I concept. Depending on context, further dimensions can be considered when appropriate. These include education, parenthood, family status, culture, language, way of thinking and working, company affiliation and experience. We consciously and with an open mind acknowledge the diversity of our stakeholders and our social environment. We promote this diversity by acting proactively in our social and business areas. As a result, we create and consolidate connections that enable us to grasp all opportunities and potential.

## Equity and equal opportunities

Equity describes the basic attitude that every person should have fair opportunities, access and development possibilities, regardless of individual circumstances. Moreover, we recognize that we have to go the extra mile to elevate underrepresented groups through special measures in order to provide a fair chance and break down barriers.

We strive to minimize physical or digital barriers within our business model, giving high priority to equity criteria in addition to economic aspects. We continue the integration of people with disabilities in the workplace by dedicated means (e.g. technical aids) so that they can participate in an environment with equal working conditions.

To achieve a better work-life-balance, we offer a diverse portfolio of work-life-initiatives and adapt these to

our constantly changing environment. Ever faster changes require an increasing flexibility of employees. We respect individual life plans and support high flexibility with innovative forms of remuneration, flexible working time models and modern working conditions.

## Inclusion is inherent in our organization purpose

Inclusion describes the behavioural pattern by which we consciously involve different people in work and decision-making processes. The unconditional, open and sensitive interaction with all stakeholders is the basic prerequisite for the optimal use of all operational potentials. Therefore, we strive for employee wellbeing and to ensure that all opinions can be heard. By committing to connecting everyone, we also create a culture and working environment in our organization where everyone feels accepted for who they are and feels they belong.

## Act with Respect and Integrity

HT Group takes accountability for sustaining the DE&I values. We expect our employees to conduct themselves in accordance with this Policy.

Respect and integrity are key to our long-term business success. We strive for diversity and act responsibly. We treat people the way we would like to be treated.

For us, integrity means doing the right thing. We not only comply with internal policies, regulations and the law, but always act in accordance with our guiding principle "Act with respect and integrity". We promote ethical awareness and strengthen value-based behaviour to act appropriately in any situation. We are a courageous organization that stands against immoral and unethical behaviour. Being courageous in everyday business requires a compass of values consisting of honesty, reliability, a sense of community and solidarity. We clearly name critical issues, unethical behaviour, or possible misconduct. All of our employees act with integrity and conviction.

HT Group employees do not tolerate any form of direct or indirect violence, discrimination or harassment at work– neither online nor offline. We also do not tolerate any kind of racism or anti-Semitism. Consequently, when representing any organization within HT Group, everyone shall refrain from behaviour which could have a discriminatory and/or harassing effect on others. This also includes HT Group's external presentation (e.g. marketing measures).

We are committed to zero tolerance of any form of sexual harassment in the workplace. Throughout the Group, we treat all incidents seriously and investigate all allegations of sexual harassment. Any allegations of deliberate misconduct will be punished in accordance with the applicable statutory provisions, regardless of the rank and position of the person in question within the Group.

In the event of a violation or suspected violation of this Policy, employees should first contact their immediate supervisor. If this route is not possible, employees can turn to the complaint office. HT Group offers the portal "Tell me!" as a reporting office. It is also possible to submit information anonymously to portal "Tell me!".

## Internal and External Reference Framework

With this DE&I Policy, our intention is to foster the DE&I values as an addition to our corporate guiding documents such as: Code of Conduct, Guiding Principles and Digital Ethics Guidelines.

Furthermore, we are working on extending the principles of DE&I to our entire value chain through our Supplier Code of Conduct, which is intended to be the basis for any collaboration with suppliers and consultants at HT Group.

We are committed to the fundamental frameworks that comprise the issues of DE&I. These include the Universal Declaration of Human Rights, the International Labor Organization's Guidelines and Declaration of Principles for Multinational Enterprises, the Organization for Economic Cooperation and Development's Convention, the Guiding Principles for Multinational Enterprises, and the ten principles of the United Nations Global Compact. Furthermore, we observe guidance from the EU anti-discrimination directives and local law in the respective countries where we operate in.

## Implementing Diversity, Equity and Inclusion

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In HT Group, the board area of Human Resource, Compliance and Legal Affairs is responsible for the strategy and steering of all DE&I measures reflected in this Policy. The implementation of DE&I is aligned with our business goals and strategies. To achieve the sustainable integration of DE&I in HT Group's business model and daily operations, the following recommendations and actions are to be observed.

### Headquarters

In this section, we describe a non-exhaustive list of collaborative measures being taken by different areas, as the benefits of diversity, equity and inclusion can only be achieved with joint efforts.

#### **Governance and reporting**

- Continue to foster DE&I in our highest corporate governance structures such as the Supervisory Board and the Board of Management, based on dedicated goals and approaches reflected in our Corporate Governance Statements
- Reporting based on legal obligations and replying to DE&I requests directed at HT Group by other relevant stakeholders (i.e. investors)
- Collaboration of different units to enable DE&I accountability in the organization

#### **Implementation plans**

- Ensuring a focus and strategy at the Top Management Level
- Advising and supporting HT Group measures to increase DE&I in leadership teams
- Monitoring the results in collaboration with those responsible for the respective area

#### **Training & Anchoring**

- Providing transparency on training opportunities to employees on various DE&I topics
- Reducing risks of unconscious biases by reflecting DE&I principles in HR processes
- Continuously reflecting diversity ambitions for talent and succession lists

#### **Communication & Networking**

- Continuously increasing visibility and recognition of underrepresented groups by special measures
- Celebrating Diversity events in order to promote DE&I principles internally and externally
- Maintaining strong ties with different DE&I communities internally and externally via various working groups

## National and Foreign Business Units

Each organization within HT Group is responsible for further implementing DE&I in its respective organization, based on the following recommendations:

- Performing analyses of the current diversity situation based on the three most influential demographic factors related to team performance: gender, age and nationality, with the help of quantitative and/or qualitative data. The results are incorporated into the company implementation plan.
- Continuously adapting realistic, yet ambitious, DE&I objectives that are aligned with organization's business objectives
- Exchanging best practices within the Group
- Annual progress monitoring and appropriate notification of management bodies

## Personal commitment

Achieving change and improvement for the company and employees requires the full participation and personal accountability of all parties.

- The Group's board members and all people leaders are role models and multipliers. It is their responsibility to put diversity, equity and inclusion into practice and promote and honour commitment in these areas.
- Employees across all levels and areas in the Group, nationally and internationally, make diversity, equity and inclusion part of their working lives.

With this Policy, we establish a holistic DE&I management and renew our commitment and accountability for it through a strong culture of inclusion and belonging.