

Policy

Equality Policy Telefónica Deutschland Gruppe

Approved by the Corporate Board of the Telefónica Deutschland Group
on 1st July 2022

Index

1.	Introduction	3
1.1	Key concepts	3
1.2	Scope of application	5
2.	Commitments	5
2.1	Selection and recruitment process, job classification, training and career advancement.....	5
2.2	Working conditions and labour rights.....	5
2.3	Co-responsible exercise of the rights to personal, family and working life.....	6
2.4	Under-representation of gender or sex	6
2.5	Remuneration	6
2.6	Prevention of sexual and gender-based harassment.....	6
2.7	Non-sexist language and communication.....	6
3.	Other stakeholders.....	7
4.	Entry into force.....	7

1. Introduction

The Telefónica Deutschland Gruppe (hereinafter, "Telefónica") undertakes through this Policy to guarantee equal treatment and opportunities in employment and occupation. Effective equality of opportunities is a priority for the company within the framework of its general policy, and this is reflected in the company's Responsible Business Principles and in its Diversity and Inclusion Policy.

Specifically, Telefónica advocates the need to raise awareness of policies for the real integration of women, as well as the eradication of any obstacles that may exist and contravene the principle of equal opportunities and non-discrimination on the grounds of sex and gender. Professional growth should be valued for the competencies, skills and knowledge of workers, regardless of their sex and gender.

Telefónica incorporates diversity management as a key element of its global strategy. Diversity and inclusion are therefore cross-cutting elements of the talent management processes in all markets where the company is present. This commitment is reaffirmed in the Telefónica Group's Diversity and Inclusion Policy. This is applicable to all the companies that form part of the group and through it the company categorically opposes any conduct or practice associated with prejudice on the grounds of, among others, nationality, ethnic origin, skin colour, marital status, family responsibility, religion, age, disability, social status, political opinion, serological and health status, gender, sex, sexual orientation, or gender identity and expression.

In this context, through this Equality Policy, Telefónica seeks to guarantee equal opportunities and non-discriminatory treatment based on sex and gender in all areas of our Company. In this vein, this Telefónica Equality Policy defines the minimum requirements to be applied in this regard for all countries and legal entities where Telefónica S.A. has activities and operations. Furthermore, in the awareness that each of the countries in which we operate has a different social context, legislation and needs, this Policy shall be put into practice through specific plans and actions for local implementation in each of our operations and countries.

1.1 Key concepts

In order to ensure effective understanding and a common interpretation by all Telefónica companies, this Equality Policy incorporates the following definitions which are of particular interest and which must be taken into account for the correct application of the principle of equal treatment in the workplace:

- **Equality plan:** This is a set of measures, adopted after a diagnosis of the situation, aimed at eliminating discrimination based on gender or sex, therefore ensuring equality in the opportunities of women and men. Equality plans shall set out the specific equality objectives to be achieved, the strategies and practices to be adopted for their attainment, as well as the establishment of effective systems for monitoring the objectives.
- **Principle of equal treatment between women and men:** The principle of equal treatment between women and men entails the absence of any direct or indirect discrimination on the grounds of sex or gender, in particular on the grounds of maternity, the assumption of family obligations and marital status.
- **Principle of equal opportunities:** Principle that presupposes that men and women have the same guarantees of full participation in all spheres.

- **Principle of equal treatment and equal opportunities in access to employment, vocational training and promotion, as well as in working conditions:** The principle of equal treatment and opportunities between women and men shall be guaranteed, under the terms provided for in the applicable regulations, in access to employment, vocational training, working conditions, including pay and dismissal, and in their membership and participation in trade unions and employers' organisations.
- **Affirmative action:** Specific action aimed at overcoming situations of direct or indirect discrimination and promoting conditions of equality.
- **Sexual harassment:** Any conduct, verbal or physical, of a sexual nature or intent that has the purpose or effect of violating the dignity of a person, in particular when it serves to create an intimidating, degrading or offensive environment.
- **Harassment on the grounds of gender or sex:** Any behaviour that has the purpose or effect of violating the dignity of a person, and of creating an intimidating, degrading or offensive environment, on the grounds of their gender or sex. Harassment on the grounds of gender or sex is not limited only to behaviour of a sexual nature or intent and includes other situations that also violate the principle of equal treatment and non-discrimination.
- **Rights to balance personal, family and working life:** The rights to balance personal, family and working life are those that are provided to workers in a way that encourages the balanced assumption of family responsibilities, avoiding any discrimination based on their exercise.
- **Direct and indirect discrimination:** Direct discrimination on grounds of sex or gender is deemed to exist where a person is, has been or would be treated less favourably on account of his or her sex or gender than another person in a comparable situation. Indirect discrimination on grounds of sex or gender is deemed to exist where an apparently neutral provision, criterion or practice places persons of one sex or gender at a particular disadvantage compared with persons of the other, unless that provision, criterion or practice can be objectively justified by a legitimate aim and the means of achieving that aim are necessary and appropriate. At all events, any order to discriminate, directly or indirectly, on the basis of gender or sex is considered discriminatory.
- **Discrimination on grounds of pregnancy or maternity:** Any unfavourable treatment of women related to pregnancy or maternity constitutes direct discrimination on grounds of sex.
- **Indemnity against retaliation:** Discrimination on grounds of sex or gender shall also be deemed to be any adverse treatment or negative effect on a person because of the submission by that person of a complaint, claim, report, demand or appeal, of any kind, aimed at preventing discrimination against that person and at ensuring effective compliance with the principle of equal treatment between women and men.
- **Promoting equality in collective bargaining:** Measures established through collective bargaining to promote women's access to employment and the effective implementation of equal treatment and non-discrimination in working conditions between women and men.

1.2 Scope of application

This Equality Policy applies to all companies of Telefónica Deutschland Gruppe. Adapted to local legislation, but with essentially the same regulatory content, this Equality Policy applies worldwide to all companies in which Telefónica S.A. directly or indirectly holds the majority of shares, participations or voting rights or in whose management body Telefónica S.A. has appointed or can appoint the majority of members in such a way that it effectively controls the company.

2. Commitments

This Equality Policy underwrites the company's commitment to the implementation and dissemination of minimum actions in the area of sex and gender equality, thus ensuring that all employees will have a homogeneous experience, at least in terms of the commitments established in this document, in the area of sex and gender equality.

This document respects and promotes strict compliance with all local legislation that may be applicable in this area, as well as agreements that may be established locally through collective bargaining.

Telefónica considers it is essential to establish a minimum framework with commitments that informs and develops the different equality plans of each of the companies/countries that form part of Telefónica in a homogeneous, orderly and coordinated manner.

This global commitment will be backed up by specific plans and actions to be set out in Telefónica's gender equality plans and actions.

Telefónica accordingly promotes the following actions throughout the entire organisation:

2.1 Selection and recruitment process, job classification, training and career advancement

Telefónica implements policies and practices for selection, recruitment, professional classification, training and promotion that are based solely on criteria of merit and ability in relation to the requirements of the job.

Therefore, in terms of selection processes and professional classification, Telefónica guarantees compliance with the principle of equal treatment and opportunities, promoting a balanced presence of women and men in all areas of the company.

With regard to recruitment, Telefónica encourages a balance of women and men in the different types of recruitment.

Telefónica is very aware of the need for training in equal treatment and opportunities for workers in general and, especially, for those who oversee a team, in order to guarantee objectivity and equality between women and men in selection, professional classification and promotion, among other matters.

Telefónica is also responsible for ensuring that all employees, regardless of gender or sex, have access to all training provided by the company and required for their jobs, ensuring equal treatment in access to training activities and, therefore, in opportunities for improvement.

Telefónica guarantees equal treatment and opportunities for women and men in promotions, using a procedure that bases promotion and advancement on objective and transparent criteria, based on the person's knowledge, experience and skills.

2.2 Working conditions and labour rights

Telefónica has established a set of working conditions in areas such as working hours, working time, prevention measures, leave, leave of absence and others, that, in most cases go beyond the legal minimum standard. In all these areas, the existence of any type of inequality or discrimination is avoided, and compliance with equal treatment between men and women is ensured.

Telefónica guarantees that all workers have their labour rights respected, regardless of their gender or sex, and under no circumstances will tolerate any forced labour, threats, coercion, abuse, discrimination, violence or intimidation or child labour in the workplace. In addition, Telefónica guarantees the right of employees to belong to the trade union organisation of their choice and will not tolerate any kind of retaliation or hostile action towards those who participate in trade union activities.

2.3 Co-responsible exercise of the rights to personal, family and working life

Telefónica believes that changes in society's values, changing roles in the family environment and women's access to the labour market should not hinder the balancing of professional, personal and family life, turning equal opportunities into a strategic element that can improve organisational performance by correctly assessing and retaining female talent in management positions in companies. The need and the right to a co-responsible work-life balance is a right for women and men, a key factor in equality and a requirement when seeking a more egalitarian, supportive and sustainable society. To this end, Telefónica promotes new organisational models that have an impact on the way we work and allow us to manage talent, while improving productivity and commitment on the part of our employees. In this sense, Telefónica also recognizes the "right to disconnect".

2.4 Under-representation of gender or sex

Telefónica is committed to guaranteeing a well-balanced presence of women and men at all hierarchical levels, professional groups and subgroups. To this end, the distribution of gender will be measured in order to determine whether there is any degree of occupational under-representation and, if necessary, to adopt measures to correct this under-representation where it is possible.

2.5 Remuneration

The remuneration of our employees is based on merit and ability in relation to the requirements of the job. To ensure a balance between global strategy and local practices, we have strategic remuneration guidelines that align these practices across the Group. As part of our Responsible Business Principles, the Diversity and Inclusion Policy and this Equality Policy, we are committed to reducing and eliminating the pay gap and, to this end, we will progressively adopt the necessary measures to achieve the target set.

2.6 Prevention of sexual and gender-based harassment

Telefónica, in its commitment to maintaining a work environment that respects the dignity and freedom of its employees, undertakes to promote working conditions that prevent harassment at work, sexual harassment and/or harassment based on gender or sex. Through its Responsible Business Principles, the Diversity and Inclusion Policy and this Equality Policy, Telefónica declares its intention to act with due diligence to prevent, avoid, resolve and, where appropriate, punish any cases of harassment in the workplace, sexual harassment or harassment based on gender or sex that may occur, as an essential means of guaranteeing dignity, integrity and equal treatment and opportunities.

2.7 Non-sexist language and communication

Telefónica promotes the use of non-discriminatory language in its workplaces, avoiding any kind of verbal aggression towards people based on their gender, sex, gender identity and gender expression,

among other characteristics. The company in its formal communications does not use any sexist or discriminatory reference to any group.

3. Other stakeholders

Telefónica, through its Supply Chain Sustainability Policy, promotes policies of equality and non-discrimination in recruitment, compensation, training, promotion, termination of contract or retirement, applying both to direct suppliers and to its own supply chain.

In addition, being fully aware of its responsibility for the markets in which it operates, Telefónica actively participates in various forums and working groups with international organisations and supports a variety of actions to promote equality for all workers.

4. Entry into force

This Policy comes into force at the time of its approval by the Board of Directors of the company.