

Guideline

Gender Equality Policy

Telefónica Germany

Approved by the Management Board of Telefónica Deutschland Holding AG on November 27, 2024

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1. Introduction

With this policy, which is based on the Equality Policy of TEF S.A., the Telefónica Germany Group (hereinafter referred to as "Telefónica Germany") undertakes to ensure equal treatment and equal opportunities in employment and occupation. Practicing equal opportunities is a priority for the company, which is reflected in the company's principles for responsible conduct and in its principles on diversity and inclusion. Telefónica Germany is committed to diversity, equal participation and an inclusive corporate culture in order to ensure that all employees can develop their full potential regardless of their identity characteristics.

Telefónica Germany takes a holistic view of diversity and considers the coexistence and interrelationship of various diversity dimensions. The "gender" dimension is therefore a specific facet of diversity alongside others in the company's DE&I approach. To put this holistic approach into practice, Telefónica Germany has included diversity management as a core element of its global strategy. This commitment is reaffirmed in the "Diversity and Inclusion Policy" of the Telefónica Group, which applies to all group companies.

The company categorically opposes any conduct or practice that is associated with discriminatory behavior based on, among other things, nationality, ethnic origin, marital status, family responsibility, religion, age, disability, social origin and health status, gender, sexual orientation or gender identity and expression.

The goal of gender equality is that the rights, duties and opportunities are not dependent on gender. Telefónica Germany is convinced that achieving gender equality is a concern that affects all genders equally. Telefónica Germany therefore sees equality of the genders as a fundamental human rights issue and the practical implementation of democratic values.

With this gender equality policy, Telefónica Germany explicitly aims to ensure equal opportunities and non-discriminatory treatment based on gender identity or gender expression in all areas of our company.

1.1 Basic concepts

To ensure a common understanding and effective implementation in practice by all Telefónica Germany companies, this policy contains the following definitions which are of particular interest, and which must be considered for the correct application of the principle of equal treatment in the workplace:

- **Gender equality plan:** This is a series of measures taken following a diagnosis of the situation and aimed at eliminating discrimination based on gender and thus ensuring equal opportunities for women and men. The equality plans set out the specific equality objectives to be achieved, the strategies and procedures to be adopted to achieve them and the establishment of effective systems to monitor the objectives.
- **Principle of equal treatment of women and men:** The principle of equal treatment of women and men includes the prohibition of any direct or indirect discrimination based on gender, in particular on the grounds of maternity, the assumption of family responsibilities and marital status.

- **Principle of equal opportunities:** Principle which requires that all genders have the same opportunities for full participation in all areas.
- **Principle of equal treatment and equal opportunities in access to employment, vocational training and promotion, and working conditions:** The principle of equal treatment and equal opportunities between women and men shall be ensured, under the conditions laid down in the applicable rules, as regards access to employment, vocational training, working conditions, including pay and termination of employment, and membership of and participation in trade unions and employers' organizations.
- **Affirmative action:** Specific measures aimed at overcoming situations of direct or indirect disadvantage and promoting de facto equal opportunities and participation.
- **Sexual harassment:** Any conduct 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 of sexual harassment.
- **Harassment based on sex:** Any conduct that has the purpose or effect of violating the dignity of a person and creates an intimidating, humiliating or offensive environment based on sex. Harassment based on sex is not limited to behavior of a sexual nature or intent, but also includes other situations that violate the principle of equal treatment and non-discrimination.
- **Right to reconcile private, family and professional life:** The right to reconcile private, family and professional life is a right granted to employees in a way that promotes a balanced assumption of family responsibilities, avoiding any discrimination based on the exercise of this right.
- **Direct and indirect discrimination:** Direct gender discrimination occurs when a person is, has been or would be treated less favorably on grounds of gender than another person in a comparable situation. Indirect gender occurs where an apparently neutral provision, criterion or practice puts persons of one gender at a particular disadvantage compared with persons of the other gender, unless that provision, criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim are necessary and proportionate. In any case, any arrangement for direct or indirect discrimination based on gender is deemed to be discriminatory.
- **Discrimination on the grounds of pregnancy or maternity:** Any discriminatory treatment of women in connection with pregnancy or maternity constitutes direct gender-related discrimination.
- **Protection from sanctions:** Any disadvantage or adverse effect on a person that is attributable to the fact that the person concerned has submitted a complaint, application, report, claim or legal remedy of any kind with the aim of preventing disadvantage to the person concerned and ensuring effective compliance with the principle of equal treatment between women and men shall also be deemed to be disadvantageous based on gender.

- **Promotion of equality in collective bargaining:** Measures taken in the context of collective bargaining to promote women's access to employment and the effective implementation of equal opportunities of all genders in working conditions.

1.2 Area of application

This Gender Equality Policy applies to all companies of the Telefónica Germany Group.

2. Declarations of commitment

This Gender Equality Policy underpins the company's commitment to the implementation and dissemination of minimum gender equality measures, ensuring that all employees have a consistent gender equality experience in relation to the commitments set out in this document.

This document is based on Telefónica S.A.'s Global Equality Policy and respects and promotes strict compliance with all local laws applicable in this area, as well as agreements that may be reached at local level through collective bargaining.

Telefónica S.A. considers it essential to establish a minimum framework of commitments that informs and develops the different equality plans of the different companies/countries belonging to Telefónica S.A. in a uniform, orderly and coordinated manner.

This global commitment under the Equality Policy is underpinned by specific plans and actions outlined in the equality plans and policies. Telefónica Germany therefore promotes the following measures throughout the organization:

2.1 Selection and recruitment procedures, job classification, training and career progression

Telefónica Germany applies policies and practices for selection, recruitment, job classification, training and promotion based solely on merit and ability in relation to the requirements of the job.

Telefónica Germany therefore ensures compliance with the principle of equal treatment and equal opportunities in its selection procedures and job classification and promotes a balanced distribution of women and men in all areas of the company.

When recruiting employees, Telefónica Germany promotes a balanced ratio of women and men. Telefónica Germany consciously relies on training on equal treatment and equal opportunities for employees in general and managers in particular to ensure disadvantageous biases in the selection, professional classification and promotion of employees of different genders and to create an environment in which all employees can develop their full potential – regardless of their gender.

Telefónica Germany also endeavors to ensure that employees of all genders equally have access to professional development training measures offered by the company and required for their work, to ensure equal treatment in access to further training measures and thus also regarding promotion opportunities.

Telefónica Germany ensures equal treatment and equal opportunities for women and men in promotions by applying 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 rights of our employees

Telefónica Germany has established a set of working conditions in the areas of working hours, working time, preventive measures, leave, time off and others, which in most cases go beyond the legal minimum standard. In all these areas, any kind of inequality or discrimination is avoided, and equal treatment of men and women is ensured.

Telefónica Germany guarantees that the labour rights of all employees, in particular the right to belong to a trade union organization, are respected regardless of their gender, and under no circumstances tolerates forced labour, threats, coercion, abuse, discrimination, violence or intimidation in the workplace.

2.3 Shared responsibility for respecting the rights to a private, family and working life

Telefónica Germany promotes the equal participation of women in the working world and is committed to the compatibility of family and career. This makes diversity and equal opportunities at all levels of the company a strategic element that can improve Telefónica Germany's performance by increasing multiperspectivity.

The need and right to establish an individual work-life balance applies equally to women and men and is a key factor for equality and a prerequisite for a more egalitarian, solidary and sustainable society. To this end, Telefónica Germany promotes new working and organizational models that make it easier to reconcile work, family care work and private life. With its principles for hybrid work, the Telefónica Germany Group has defined its working methods of the future and anchored them in the company step by step. The five principles are:

- Flex and Connect - combining mobile work with face-to-face meetings on site
- Working Anytime - greatest possible time flexibility
- Outcome-based leadership - consistent focus on results
- Digital Excellence - openness to digital working methods and tools
- Responsible Travel

With these principles, the Telefónica Germany Group enables the compatibility of different life models with professional requirements and at the same time strengthens cooperation. This promotes inclusion and creates new opportunities, especially for women in management positions. This hybrid working model, which was introduced as a new standard after the pandemic, is continuously reviewed to ensure its effectiveness.

In alignment with digital work settings, Telefónica Germany expressly recognizes the right to "digital disconnection". We are convinced that personal interests outside of work are an important component of personal growth and well-being and contribute to a diversity of perspectives.

2.4 Gender-related underrepresentation

Telefónica Germany strives to ensure a balanced distribution of women and men at all hierarchical levels, occupational groups and subgroups. To this end, the gender distribution is measured to determine whether there is any underrepresentation and, if necessary, to take measures to correct this underrepresentation where possible.

2.5 Compensation

The compensation of our employees is based on performance and ability in relation to the requirements of the position. As part of our Principles for Responsible Management, the Diversity and Inclusion Policy and this Gender Equality Policy, we are committed to reducing and eliminating gender pay gaps and will gradually take the necessary measures to achieve this goal.

2.6 Prevention of sexual and gender-specific harassment

Telefónica Germany is committed to a working environment that respects the dignity and freedom of its employees and is committed to ensuring working conditions, that prevent harassment in the workplace, sexual harassment and/or harassment based on gender or gender identity.

This is done through the Principles for Responsible Management, the Diversity and Inclusion Policy and this Equal Opportunities Policy. As an essential element in ensuring dignity, integrity, equal treatment and equal opportunities, Telefónica Germany always acts with the utmost care to prevent, avoid, investigate and, if necessary, punish any cases of harassment in the workplace.

2.7 Non-discriminatory language and communication

Telefónica Germany is committed to using non-discriminatory language in the workplace and avoids any kind of verbal aggression towards people based on their gender, gender identity and other characteristics. In its official communications, the company strives to use language sensitive to discrimination that recognizes diversity as a reality and an asset while avoiding stereotyping.

3. Other interest groups

With its Supply Chain Sustainability Policy, Telefónica Germany promotes a policy of equal rights and non-discrimination in recruitment, remuneration, training, promotion, termination of contracts or retirement, which applies both to direct suppliers and to its own supply chain.

In addition, Telefónica Germany

and its parent company Telefónica S.A. are aware of their responsibility for the markets in which they operate and actively participate in various forums and working groups of international organizations and support a variety of measures to promote equality for all employees.

In addition, further measures for observing human rights due diligence obligations are embedded in the risk-based human rights due diligence process (human rights policy statement).

4. Entry into force

This policy comes into force on the date of its approval by the company's Management Board.