

# Rules of procedure for the complaints procedure

In the event of tip-offs concerning human rights-related or environmental risks and violations

In accordance with the Act on Corporate Due Diligence in Supply Chains (Lieferkettensorgfaltspflichtengesetz – LkSG)

**Public**

# TellMe whistleblower portal for tip-offs and complaints from all around the world

We aim to act responsibly in every dimension of our business activities – everywhere and at all times. We are working towards this goal every single day. We are aware that we must keep focusing on continuously reviewing and further developing our due diligence processes. Every tip-off helps us in this endeavor. We would therefore like to give **all stakeholders** the opportunity to express any concerns they may have about human rights-related or environmental issues that relate to Deutsche Telekom, and to draw our attention to any deficiencies. Our **TellMe whistleblower portal** offers an easy way to report any such concerns, and whistleblowers can remain anonymous if necessary.

**Perhaps you are aware of conduct that could harm other people, damage the environment, or compromise our integrity. This includes tip-offs concerning risks relating to human rights or the environment, the restriction of people's freedom of speech, or violations within our supply chain – and could involve the actions of our employees in their business unit in one of the Group's companies, or the actions of our suppliers or business partners.**

Whistleblowers can also submit tip-offs about potential risks or violations. These may relate to the provisions of the German Act on Due Diligence in Supply Chains, including:

## **Human rights-related risks/violations:**

- Disregard for occupational health and safety (based on national regulations)
- Child labor by children under the permitted minimum working age
- Forced labor/slavery
- Violations of the freedom of association
- Discrimination (background, disability, age, gender, religion)
- Withholding an adequate living wage (based on national regulations)
- Causing harmful soil changes
- Water or air pollution
- Harmful noise or excessive water consumption

## **Environmental risks/violations:**

- Through involvement in the manufacture and disposal of mercury-added products
- Through the production or use of certain persistent organic pollutants
- Risks caused by the collection and disposal of waste

## **Every tip-off submitted will be examined by a team of experts**

**Every report** will be thoroughly examined by a **team of experts**, suspected cases will be investigated, and any breaches rigorously followed up. These channels **are open to everyone** – our **employees, our suppliers and contractors, our other business partners, workers in our supply chains, and civil society**.

## **Every whistleblower has the right to be protected from reprisals**

If requested, all information given will be treated in confidence to the extent permitted by law. Whistleblowers can also choose to submit any tip-off anonymously, using the [online reporting tool](#). Furthermore, every whistleblower has the right to be protected from reprisals. Provided that whistleblowers have acted to the best of their knowledge and in good faith and have not broken any applicable law themselves, they will not suffer any disadvantage or harm as a result of their tip-off. Action may, however, be taken against a whistleblower who has deliberately made a false allegation. Deutsche Telekom will be rigorous about sanctioning and taking action against anybody who breaches the ban on reprisals against protected whistleblowers.

## Procedure

### Step 1: Getting in touch

You can contact us via the following channels:

- **By telephone**, using the free international service number +8000 3824 835
- **By email:** [tell-me@telekom.de](mailto:tell-me@telekom.de)
- **By post:** Deutsche Telekom AG, Hinweisgeberportal TellMe, Friedrich-Ebert-Allee 140, 53113 Bonn, Germany
- **Anonymous online reporting:** [www.telekom.com/de/konzern/compliance/hinweisgeberportal](http://www.telekom.com/de/konzern/compliance/hinweisgeberportal)

Whichever method you choose, you can communicate in **English or German**. If you choose the **anonymous online reporting system**, **other languages** are also possible. If, in a particular case, another language is needed to handle the tip-off, a translation service can be used. All tip-offs will be recorded by **trained staff from the Compliance unit** to be dealt with as **prescribed by law** and with all due consideration to protecting the whistleblower.

### Step 2: Confirmation of receipt of the tip-off, generally within seven days:

Every whistleblower will generally receive a **confirmation of receipt of their tip-off within seven days**. They will also be assigned a **contact person for subsequent proceedings**. We will endeavor to conduct communications in the language that will ensure the best possible understanding. The matter will be forwarded to our team of experts for further processing.

### Step 3: Team of experts reviews its validity

Our team of experts will assess the **validity of the tip-off** and determine any **further responsibilities**. If the tip-off is rejected, the whistleblower will be advised of the reasons for this decision. Our team of experts is made up of experts in the relevant fields. As a general rule, these legal experts are accredited in-house lawyers, who will act as independently and autonomously as possible when assessing the tip-off reported by the whistleblower.

### Step 4: Determining the facts in cooperation with the whistleblower

Following consultation with the whistleblower, other involved parties may also be consulted in the course of **further determining of facts**.

### Step 5: Remedial action is prepared

**Proposals to remedy the situation** will then be developed, in consultation with the whistleblower, where appropriate. The whistleblower will generally be advised of the **outcome** of the procedure and any derived measures within around **three months after the confirmation of receipt** of their tip-off.

### Step 6: Conclusion of the procedure and archiving

We will **archive** the matter and a record of the remedial action taken **as prescribed by law**.

### Step 7: Whistleblower feedback

**Voluntary feedback** from the whistleblower about the process as a whole, once the matter is closed, **helps us with the further development** and the annual effectiveness review of our complaints procedure.

**We will always endeavor to adhere to the stated deadlines within the procedure. If, in a particular case, we anticipate a delay due to the need for additional measures to determine the facts, the whistleblower will be advised accordingly.**