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Compliance: acting lawfully and fairly

Our compliance culture is an essential building block for corporate management geared towards integrity and appreciation. Throughout the Group, we are committed to the law and ethical principles that we have anchored in our internal regulations.

We deal with the topic of compliance in more detail in our <u>Sustainability Statement 2024</u> and on our <u>website</u>.

How we understand compliance

Compliance risks are risks arising from systematic violations of legal or ethical standards that could lead to regulatory or criminal liability of the company, its board members or employees, or to significant damage to its reputation. To minimize these risks, we have set up a compliance management system (CMS). It is based on three building blocks: culture, trust and simplicity.

Culture



Culture is the basis of our cooperation. Compliance cannot be successful without a good and open corporate culture in which each individual is willing to take responsibility, deal constructively with mistakes and point out risks.

Trust



Trust goes in two directions: Our compliance team provides trustworthy advice and works together with the business units to find solutions for dealing with compliance risks. Conversely, however, trust also means that compliance requirements are only made where it is necessary from a risk point of view.

Simplicity



Simplicity means that we want to make it as easy as possible for everyone in the company to follow the rules and implement compliance requirements. This includes that rules should be clear and simple and reduced to the essentials.

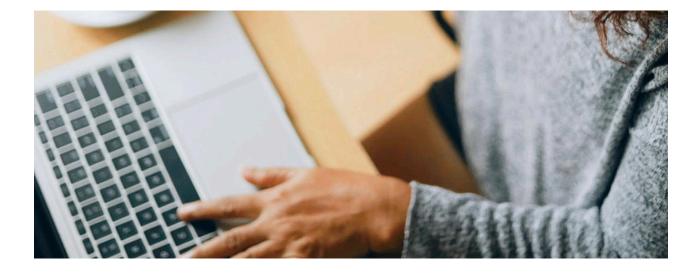
Compliance in a dynamic business environment

Increasing regulatory requirements, new digital business models, intensified international competition – all of these are influencing our compliance strategy. That's why we have to constantly review, develop and adapt our CMS. Our goal: We want to build a "Leading Digital Compliance Management System" (Leading Digital CMS). By this we mean a CMS that

- integrates Compliance requirements into business processes as seamlessly as possible,
- shows existing compliance risks up-to-date and transparent at all times and
- actively embraces and addresses new developments in the business and regulatory area and uses the findings for continuous improvement.

Compliance management: digital into the future

Under the heading "Compliance Digital Transformation", we are further developing our compliance processes with the help of IT tools and AI applications. The aim is to make these processes even more efficient. This is supported by the "ICARE Check" – a simple self-test with five questions for critical situations. The test is designed to help our employees navigate difficult situations and assess whether advice should be sought before deciding how to proceed.



Networking for success

We regularly discuss strategic compliance issues with the compliance officers in our international Group companies – in the year under review, for example, at Deutsche Telekom's International Law & Integrity Meeting 2024 in Bratislava.

Other examples of compliance work across divisional and company boundaries include:

- There is a regular exchange between central and decentralised compliance departments.
- At the international level, virtual "Compliance Community Calls" are also held on compliance strategy and current projects. Compliance officers from decentralized units will also present their business areas and challenges there.
- We also enter into dialogue with other companies and expert circles on compliance issues.
- Finally, we contribute to the further development of compliance standards and management systems with specialist lectures, publications and other contributions.

Involvement in anti-corruption initiatives

We are actively involved in national and international associations and organizations that focus on compliance issues – such as the German Institute for Compliance (DICO e.V.). For years, we have taken the United Nations' International Anti-Corruption Day on December 9 as an opportunity to draw attention to the issue of bribery and corruption within the Group.

Looking ahead

Responsibility, vigilance and dialogue within and outside Deutsche Telekom characterize our work on the topic of compliance. With the goal of a Leading Digital CMS in mind, we remain a reliable partner for our stakeholders and promote our culture of integrity and transparency.

Deep Dive for experts

Management & Frameworks

- We have implemented a compliance management system (CMS) to minimize risks from systematic violations of legal or ethical standards that could lead to regulatory or criminal liability of the company, its board members or employees or to significant damage to their reputation. The Board of Management assumes its overall responsibility for compliance as a key management task. Our Chief Compliance Officer is responsible for the design and management of the CMS. At the level of our operating segments and national companies, compliance officers implement the CMS and our compliance goals on site.
- IDW PS 980: Audit with a focus on anti-corruption

Other sources of compliance information

- (i) Compliance Deutsche Telekom
- Sustainability Statement 2024

Risks and opportunities

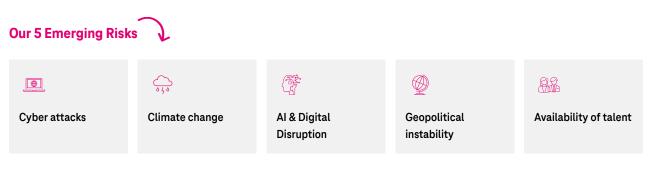
We have a Group-wide risk and opportunity management system in which we record various risks and opportunities as well as emerging risks for our company. It helps us manage potential threats, seize opportunities, and increase resilience to unpredictable events. It also supports strategic decision-making.

You can find more detailed information on the Risk and Opportunity Management System in our Annual Report 2024.

Taking a closer look at emerging risks

New or foreseeable risks for the future, the risk potential of which is not yet known with certainty and whose effects are difficult to assess, are referred to as emerging risks. These can be geopolitical tensions, new technologies or macroeconomic factors. While these risks may already be impacting our business today, their effects may increase within three to five years and affect us much more severely in the future.

If we want to protect our company and our customers from these risks, we must identify and evaluate them at an early stage and initiate measures to mitigate risks as part of our risk and opportunity management system. In order to reduce negative impacts, we may also need to adapt our strategy or business models.



Cyber attacks



The speed of digital transformation, machine learning, and computing power is increasing exponentially. At the same time, there are more and more cyberattacks, which are also more sophisticated and efficient. They overhaul security optimizations, so that the number of possible gateways for attacks in our company increases.

The effects of this risk include, but are not limited to:

- System failures and business interruptions
- Loss of customer data with resulting fines and reputational damage
- Rising cybersecurity costs (including infrastructure, processes, personnel)

Our mitigation measures include, but are not limited to:

- Increased investment in cybersecurity infrastructure, experts, training, and communications, as well as regular cybersecurity testing, such as phishing and penetration testing
- Develop and update cyber incident response plans
- Use of AI-powered early detection and response tools

For more information on cybersecurity, see <u>Cybersecurity and data protection</u> here in the CR report.

Climate change



Advancing climate change is leading to more intense and frequent extreme weather conditions at an ever faster pace. This is associated with phenomena such as warming of the oceans, higher heat and humidity, as well as rising average temperatures and severe storms or heat waves. These events, in turn, could lead to natural disasters such as floods and droughts.

The effects of this risk include, but are not limited to:

- Damage to the network infrastructure
- Data Center Cooling Challenges
- Delivery delays due to interrupted supply chains

Our mitigation measures include, but are not limited to:

- Introduction of carbon-reducing business models (e.g. recycling and waste reduction)
- Creation of emergency plans, for example with assessment of critical systems and resources
- Increasing the resilience of own sites and in the supply chain to extreme weather events (e.g. strengthening physical site protection)

Further information on our approach to climate protection can be found under <u>Climate protection</u> here in the CR Report.

AI and Digital Disruption



Disruptive technologies such as cloud and quantum computing, AI and machine learning are developing rapidly. In addition to opportunities, they also bring new risks, including unexpected AI decisions, privacy issues, and more false or misleading information. Increasingly sophisticated AI-generated content can lead to social divisions, political repression and new forms of cybercrime.

The effects of this risk include, but are not limited to:

- More frequent and successful cyberattacks
- Wrong decisions based on incorrect or non-transparent information
- Loss of reputation, e.g. due to misinformation, disinformation or discrimination

Our mitigation measures include, but are not limited to:

- Establish company-wide controls to guide the development and deployment of new technologies and establish strong policies, procedures, and measures.
- Continuous investment in upskilling programs to ensure the necessary digital skills.

Geopolitical instability



Tensions at the international level threaten the stability of the global economy and financial markets. Economic, political and/or technological rivalries between different geopolitical actors could lead to new trade barriers and thus further drive deglobalization. The effects of this risk include, but are not limited to:

- Destruction of network infrastructure through political uprisings and sabotage
- Supply chain disruptions or delays
- Uncertainty in strategic and financial planning

Our mitigation measures include, but are not limited to:

- Close monitoring of policy developments and adaptation of our shoring strategy
- Integrating geopolitical risks into the company-wide risk assessment and developing/validating corresponding contingency plans
- Development/review of scenario planning activities

Availability of talent



Our long-term success depends on our ability to acquire, retain and develop top talent. However, there could be an exacerbated labor shortage if new jobs require special technological skills and more workers retire.

The effects of this risk include, but are not limited to:

- Failure to achieve growth targets
- Higher costs for upskilling and reskilling as well as talent programs
- Increasing talent turnover, for example in the IT/tech sector

Our mitigation measures include, but are not limited to:

- Inclusion of new ways of working that take into account the needs of employees, esp. an inclusive, flexible environment
- Shifting the focus of recruiting and development from roles to skills and from experience to learning
- Developing training programs to upskill existing employees, as well as creating long-term incentives and compensation programs to retain and develop talent

Looking ahead

To strengthen Deutsche Telekom's resilience, we are taking targeted measures to minimize the risks described. In this way, we want to ensure that we can continue to operate successfully and sustainably in the future.

Deep Dive for experts

Management & Frameworks

Our Group-wide risk and opportunity management system is organized in a decentralized manner. Methods for this and for the associated reporting, especially the Group Risk Report, are specified by the Group Risk Governance department. All operating segments as well as the Group Headquarters & Group Services segment are connected to the central Group system via their respective risk and opportunity management systems. In the segments, the respective managers are responsible for identifying, evaluating and continuously monitoring the risks. Possible opportunities are taken into account by the management in the annual planning process and continuously developed in the course of the operational business.

Other sources of information on risks and opportunities

Annual Report 2024 – Risk and Opportunity Management

Cybersecurity and data protection: secure systems, protected privacy

On average, third parties try to gain access to our systems up to 40,000 times per minute. Not least in view of AI-generated attacks, the topic of IT security (cybersecurity) is becoming increasingly relevant. The highest standards of IT and data security as well as data protection are part of our brand identity. Our security experts work around the clock to fend off attacks and protect our infrastructure.

Here in the CR report, we focus on the topic of cybersecurity and only occasionally address data protection aspects. We deal with data protection issues in detail in our <u>Sustainability Statement 2024</u>.

Defend against attacks around the clock

To fend off attacks, we are constantly developing new processes and continuously improving our sensor technology. Our Cyber Defense Center monitors the security of the Group worldwide (excluding T-Mobile US) with the help of internationally oriented Cyber Security Incident Management and also offers services for business customers. In so-called <u>Cyber Defense and Security</u> <u>Operations Centers</u> (SOC), we keep an eye on the security situation for ourselves and our customers 24 hours a day.

Evaluating attacks with AI

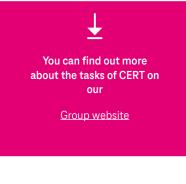
With the help of artificial intelligence (AI), our security specialists analyze around one billion security-relevant data from around 3,000 data sources every day. They detect attacks in real time and immediately take the necessary steps to render them harmless or ward them off. There were 70 million attacks per day on our honeypot systems in 2024 – these are traps deliberately set for attackers. In Europe, we are pioneers in the proactive fight against botnets (interconnected computers infected with malware) in the Deutsche Telekom network. This is how we protect our infrastructure – and thus also the data of our customers. In the year under review, we further expanded our global network of protection centers. In Bonn, we have put a master SOC into operation, in which over 250 cybersecurity experts work. It is one of the largest of its kind in Europe and works together with our centers in 13 other countries.

Incidents closely targeted

All reports of security incidents on our information and network technologies are concentrated internationally in our Cyber Emergency Response Team (CERT). It is responsible for managing incidents and developing mechanisms to detect attacks on internally and externally accessible systems at an early stage.

At the same time, our threat intelligence team analyzes how the perpetrators proceeded and which tools they use. The experts are well networked with researchers from all over the world and exchange the latest scientific findings.

We also offer our services against cyberattacks to other companies: More than 150 German DAX and medium-sized companies use our services for their own protection.



You can find more Information about our projects to strengthen cybersecurity in the

CR Facts

🕭 Security and commitment combined: Deutsche Telekom Security GmbH 🥌

It is one of the world's largest providers of digital security and the market leader in Germany, Austria and Switzerland: Deutsche Telekom Security GmbH bundles cybersecurity expertise throughout the Group and has not only successfully secured our own infrastructure for many years – the solutions are also offered to our customers. In order to further improve cooperation in digital hazard prevention, Deutsche Telekom Security GmbH is involved in numerous organizations and associations. It also works with other ICT service providers in Germany and at EU level.

The company's focus is also on the protection of children on the internet: its portfolio includes educational offerings such as AwareNessi, which are designed to provide children with basic knowledge in the field of online safety. For more information on our approach to protecting children when using digital media, please visit <u>Consumer protection</u> here in the CR report.

Deutsche Telekom Security GmbH offers part-time training to become a cyber security professional and other career opportunities. We provide detailed information on this here in the CR report under <u>Employee development</u>.

Progress in 2024: Impact of our actions

We conduct regular surveys to determine the data protection and security awareness of our employees on a random basis (Group-wide excluding T-Mobile US). Based on the survey results, we calculate various indicators that we use to check the effectiveness of our IT security and data protection measures. The Security Awareness Index (SAI) is a benchmark for how employees rate IT security at Deutsche Telekom. The higher the value, the better the rating. With the so-called Data Protection Award indicator, we calculate the level of data protection in the units on a scale from 0 to 100 %.

You can find out more about the impact of our data protection measures in our

Sustainability Statement 2024

We last surveyed the SAI in 2023: it achieved 80.6 (previous survey 2021: 80.9) out of a maximum of 100 points. We last calculated the Data Protection Award key figure in 2022: It was 88 % (2020: 86 %).

In the reporting year, we began to fundamentally revise the calculation of the two key figures. In the area of data protection, we will integrate the evaluation into our mandatory training on data and information protection in the future. For cybersecurity, 2024 marked the start of our new, annual Security Awareness Survey. In the reporting year, we surveyed around 63,000 randomly selected employees. In the future, the SAI will be collected on the basis of these annual survey results.

Looking ahead

Our intentional traps for cybercriminals were targeted by 70 million attacks per day in the reporting year. This shows how important it is to continuously improve our cybersecurity activities. With innovative processes, the increased use of AI and the expansion of our protection centers, we are doing everything we can to keep our infrastructure and our customers' data secure in the future.

Deep Dive for experts

Management & Frameworks

- We have established a security organization centrally and in all units of the Group. The "Security" guideline contains Deutsche Telekom's key security-related principles with regard to data security and cybersecurity and is based on the ISO 27001 standard.
- Since 2020, CERT has been officially certified according to the SIM3 (Security Incident Management Maturity Model) standard.
- Our group companies are subject to specific data protection regulations, such as the GDPR in the EU. Our data protection management system describes measures, processes and audits to ensure compliance with these regulations. With our globally active <u>data protection organization</u>, we are constantly working to maintain a transparent and high level of data protection in all Group companies. As far as legally possible, the companies in the Group have also committed themselves to complying with the <u>Binding Corporate Rules Privacy</u>, which is intended to ensure a uniformly high level of data protection in accordance with ISO 27701 for our products and services.
- We provide comprehensive information about our data protection activities on our <u>website</u>. Since 2014, we have also published an annual <u>transparency report</u>. In our <u>Status report on data privacy</u>, we also report on major data protection-related processes and associated measures.
- Our customers in the U.S. receive information about the data protection practices of our U.S. subsidiary via the <u>Privacy Center of T-Mobile US</u>. It provides consumers with information about how the company collects, uses, shares, and protects personal customer information; additional information about the types of data collected and the programs that individuals can enable and disable; what types of data are used internally and under what circumstances data may be sold or disclosed to third parties; and more information about how data is stored and backed up.
- In addition, T-Mobile has policies and procedures in place to maintain data security through the submission of Cybersecurity Service Requests (CSR). T-Mobile US also conducts a comprehensive data inventory of its systems.
- We want to ensure the lawful processing of personal data while respecting general human rights. In our <u>Human Rights Code</u>, we (Deutsche Telekom without T-Mobile US) are committed to the fundamental right to data protection and informational selfdetermination that applies in the EU and would like to promote its worldwide recognition.
- In our <u>guidelines for the ethical use of Al</u>, we have also set out how we (Deutsche Telekom without T-Mobile US) deal responsibly with Al in our products and services. T-Mobile US is steering the issue with its Responsible Al Policy and Guidelines.

Relevant standards

- Sustainability Accounting Standards Board (SASB)
 - TC-TL-230a.2 (Data integrity)

Other sources of information on privacy and security

- (i) Deutsche Telekom's security and data protection activities
- Laws and corporate regulations
- Corporate Responsibility Reporting Hub of T-Mobile US
- T-Mobile Privacy Center

Consumer protection: ensuring safety and transparency

With our commitment to consumer protection, we want to minimize legal risks and strengthen the trust of our customers. We are continuously working to ensure that consumers can use our products and services safely. We are also committed to the protection of fundamental digital rights and other consumer policy issues with various initiatives.

You can find more detailed information on the topic of consumer protection in our Sustainability Statement 2024.

Our most important topics in terms of consumer protection

Our commitment to the interests and protection of our customers has different focuses. In doing so, we are always guided by the challenges and requirements of the countries in which we operate.



Data protection and data security are extremely important to Deutsche Telekom. That is why we take strict data protection and security requirements into account both in the development of our products and services and in the use of them by our customers. In addition to the Sustainability Statement mentioned above, further information can also be found here in the CR report under <u>Cybersecurity and data protection</u>.



We incorporate the topic of "mobile communications and health" and current scientific research into our processes. With regard to electromagnetic fields (EMF) used in mobile communications, we follow the recommendations of the International Commission on Radiological Protection and build our mobile networks in such a way that the electromagnetic fields are below the legal limits. In this way, we ensure that the respective legal limits are complied with and that health protection is thus reliably ensured. In addition, we publish comprehensible and technically sound consumer information about the effect of EMFs.

We want to promote the protection of children and young people when using digital media and protect them from harmful content. Therefore, we provide age-appropriate offers and offer helpful information to parents or guardians. In addition, we work closely with law enforcement agencies and NGOs as well as other partners from business, politics and society. Further information on our measures can be found here in the CR report under <u>Digital inclusion</u> or at <u>Teachtoday International</u>.

😤 Excursus: Digital Fundamental Rights 🦵

Protecting minors when using online platforms is also one of the key objectives of the Digital Services Act (DSA), which came into force in the EU in 2024. According to this, platforms on the internet must enable their users, for example, to report posts with disinformation and hate speech. We welcome the law and are committed to informing consumers about their fundamental digital rights – for example as part of our "<u>No Hate Speech</u>" initiative. In the year under review, we also participated in a tender from the European Commission to develop an age verification app – and were awarded the contract at the beginning of 2025. For more information, please visit our <u>website</u>.

Commitment to consumers

Customer satisfaction is a top priority for Deutsche Telekom. We are therefore politically committed to helping to shape the framework conditions for consumers. Our key consumer policy issues are:

- Simple legal framework as the basis for a positive customer experience in service
- Commitment to consistent and understandable communication with customers
- Protection of customer interests in telecommunications (e.g. when changing providers in the fixed network and mobile communications)
- Strengthening comprehensive and cross-technology protection of minors at national and EU level
- Continuous continuation of consumer data protection (e.g. in the online advertising industry)

In all subject areas, we stand for a balanced, constructive and solution-oriented approach that is geared to both consumer needs and corporate interests.

Looking ahead

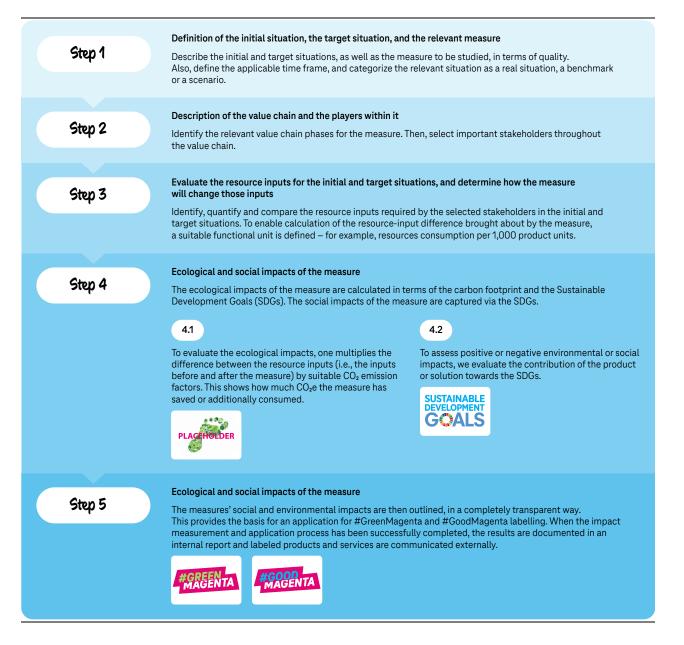
In addition to our commitment to data and network security and mobile phone limits that are harmless to health, our main focus is on the well-being of minors. In 2025, we will continue our previous efforts and develop an age check app on behalf of the European Commission – for more protection, security and privacy for children and young people in the digital world.

Impact measurement: understanding and improving our contribution

What impact does our business activities have on the environment and society? And how do we contribute to the achievement of the United Nations' Sustainable Development Goals (SDGs) with our products, solutions and measures? These questions guide us in measuring impact. With their help, we are getting closer and closer to our goal: to constantly increase the positive impact of our business activities and minimize negative impacts.

Measure and control impacts with "Impact Measurement"

Together with internal and external experts, we have developed a multi-stage approach to impact measurement: our "Impact Measurement". This allows us to determine the environmental and social impacts of projects, products or measures and determine our contribution to the SDGs. The IT-supported approach was validated and certified by an audit by TÜV Rheinland in 2023 and confirmed again in the reporting year.



We use the results of the impact measurement to continuously improve our sustainability performance. They also help us to make the sustainability benefits of our products transparent and to highlight them in our communication with private and business customers, investors and other stakeholders.

A total of 52 Deutsche Telekom products and solutions have so far undergone our impact measurement and subsequently received one of the two labels #GreenMagenta or #GoodMagenta. The #GreenMagenta label identifies products, services, projects, measures and initiatives that make a positive contribution to climate protection and the responsible use of resources. #GoodMagenta, in turn, identifies projects, measures and initiatives with a positive contribution to social and societal challenges in the digital world. 11 new products and measures were added in the reporting year. You can find an up-to-date overview of all marked products on our <u>website</u>.

Impact measurement in concrete terms: examples from the reporting year

Optimized smartphones



In the reporting year, the second generation of our T Phones was launched on the market: similarly affordable as the previous models, even more powerful and with reduced CO_2 emissions in the production process. We achieve this by increasing the use of renewable energies and optimizing the use of semiconductors. With the T Phone 2, for example, we save around 10 tons of CO_2 e emissions per 1,000 smartphones; the T Phone 2 Pro has about 13 CO_2 e emissions. We have also reduced the size of smartphone packaging and switched to plastic-free materials – thus improving recyclability.

We introduced the T Phone 2 and the T Phone 2 Pro in almost all of Deutsche Telekom's national companies. Similar products from the REVVL series are available in the USA.

Network solution for lower emissions



Our SD-WAN based on Cisco (Intra-Select) enables energy-efficient network management. To do this, the solution uses a universal CPE device (uCPE) that combines various services – for example, for managing or protecting networks. Previously, each of these functions required separate devices. They usually took up a lot of space, power and cooling and often required technicians on site. All of this can be saved by a uCPE. In addition, customer locations can be networked worldwide; this can save more than 30 % CO₂ emissions.

The central control of these networks (controllers) is carried out by IntraSelect SD-WAN in Open Telekom Cloud (OTC). This cloud covers its electricity needs entirely from renewable energies and requires 30 % less energy than comparable data centers.

Energy-efficient light management



Controlling and monitoring lighting and signage systems digitally from a distance – this works with a solution for the Internet of Things (IoT). With a system from the start-up LichtWART and Deutsche Telekom, the intensity and duration of illuminated signage can be more easily controlled in order to reduce light pollution and negative effects on people, animals and nature. This also reduces energy consumption and extends the service life of LED lamps. Compared to conventional alternatives, users save an average of 40 % energy and emit about 5 tons less CO₂e emissions per 30 lighting systems per year.

Looking ahead

Already 52 of our products, projects and initiatives have been labelled with one of our two sustainability labels #GreenMagenta and #GoodMagenta. With our internal experts and experts from other companies and organizations, we are constantly working on new solutions for even lower greenhouse gas emissions, lower resource consumption and positive contributions to the digital society – demonstrably so.

Deep Dive for experts

Management & Frameworks

Testing and certification of the Impact Measurement & Evaluation Process (IMEP) by TÜV Rheinland

Further sources of information on impact measurement and the SDGs

- (i) Sustainability label #GreenMagenta and #GoodMagenta
- (i) Our contribution to the SDGs
- 🛈 Quality confirmed: TÜV Rheinland validates the awarding of Deutsche Telekom's sustainability labels

Human rights and supply chain: living responsibility

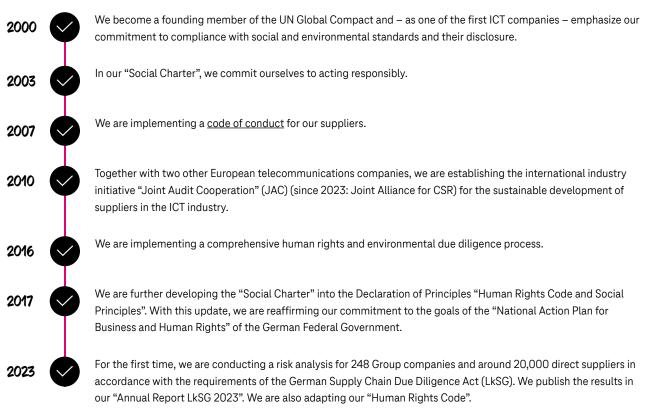
"Act with respect and integrity" is part of our guidelines and thus an obligation for all employees of the Group. We are committed to respecting and promoting human rights in every place where we operate, including in our supply chains and with our business partners. To this end, we have implemented a human rights and environmental due diligence process.

More detailed information on human rights can be found in our <u>Sustainability Statement 2024</u> (ESRS S1 and ESRS S2) and on our <u>website</u>.

Milestones achieved, ongoing projects and goals

The protection of human rights and environmental concerns has been part of our business activities and corporate governance for more than two decades. Initially driven by our voluntary commitment, our actions are also regulated by law, especially with regard to the supply chain. As part of our human rights and environmental due diligence process, we regularly analyze the risks and impacts of our business activities with regard to human rights and environmental concerns. We use the analysis results to avoid, minimize or end negative effects. They also enable us to make targeted improvements.

Where we come from



Where we stand in the reporting year



134 Group companies are implementing the "Human Rights Code" and thus updating their human rights policy statement. In addition, we are publishing a legal report on the implementation of due diligence obligations in accordance with the LkSG in 2023 (BAFA report).

Where we want to go

Other Group companies are introducing the "Human Rights Code". We are preparing for the further development of human rights due diligence processes in accordance with the European Supply Chain Act (CSDDD) and are examining participation in industry initiatives in order to minimize identified human rights risks even more effectively.

Key figures: human rights and environmental protection in procurement

With the help of implemented measures and the processes behind them, we aim to minimize human rights and environmental risks in the supply chain. We use various ESG KPIs to monitor and manage progress.



ESG KPI "LkSG Supplier Risk Score"

As part of the legal requirements (Supply Chain Due Diligence Act/"LKSG"), we developed a new ESG KPI, the "LkSG Supplier Risk Score".

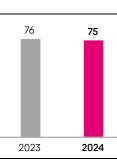
This ESG KPI assesses the risk of human rights and environmental violations in relation to direct suppliers of the Deutsche Telekom Group (excluding T-Mobile US).

The number of our suppliers with purchasing volume in the reporting period was assessed by an established external service provider according to a standardized methodology of LkSG violations that may occur.

In the 2024 financial year, 75 % (2023: 76 %) of our direct suppliers were classified as low-risk in terms of environmental and/or human rights risks. The proportion of direct suppliers classified as at increased risk was assessed at 25 % (2023: 24 %).

ESG KPI "LkSG Supplier Risk Score"

Share of low-risk suppliers (in %)



Due to legal requirements, the ESG KPI "Procurement volume without CR risk" was adjusted to the ESG KPI "LkSG Supplier Risk Score".

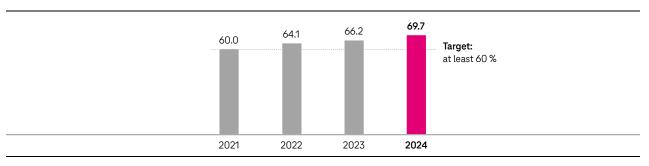
ESG KPI "Purchasing volume verified as non-critical"

This ESG KPI measures the proportion of our purchasing volume from suppliers that have been audited for social and environmental criteria - for example, in the course of EcoVadis, CDP, social audits or supplier visits. The target value by the end of 2025 is 60 %. The share was 69.73 % in 2024.

We calculate this ESG KPI based on the audited Group-wide purchasing volume from the uniform purchasing reporting system (excluding T-Mobile US).

ESG KPI "Procurement Volume Verified as Non-Critical"

in %

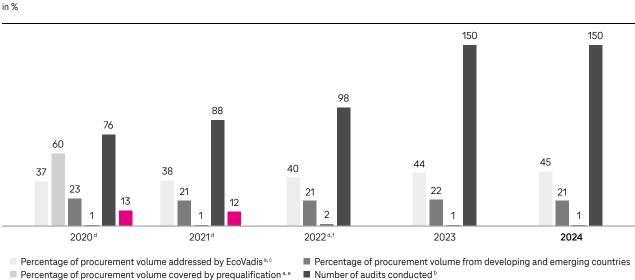


In addition to human rights-related issues, climate protection is also highly relevant in our supply chain. In this context, we determine the ESG KPI "CDP Supply Chain Program", which we report here in the CR report under Environmentally friendly products and services.

Audited purchasing volume

The share of the audited purchasing volume fell slightly from 22.3 % in the previous year to 21.1 % in 2024. At the same time, the share of purchasing volume covered by EcoVadis rose slightly to 45.0 %.

Share of our audited procurement volume



Percentage of audited procurement volume^a

Number of audits conducted^b

Number of workshops conducted^f

^a Includes social and mobile audits carried out both internally and externally. Based on procurement volumes at Group Procurement.

^b Includes social and mobile audits carried out internally and externally. (Both within Deutsche Telekom and via the Joint Audit Cooperation (JAC)). Audits also include follow-up audits.

^c Until 2020: Percentage of procurement volume addressed by E-TASC.

 $^{\rm d}\,$ Excl. T-Mobile US and from 2020 without the category Network Capacity.

^e From 2021, the value for pre-qualification will no longer be displayed.

^f From 2022, the value for the number of workshops held will no longer be displayed.

Audits: results 2024

Through our auditing program, we regularly review the working conditions at the production sites of our suppliers (excluding T-Mobile US). In the reporting year, we carried out the following audits:



150 audits

divided between 62 direct (Tier-1) and 88 indirect (77 Tier-2 and 11 Tier-3) suppliers (11 surveys, 115 on-site social audits as part of the industry initiative Joint Alliance for <u>CSR</u> (JAC), 24 audits as part of the Validated Assessment Program of the Responsible Business Alliance) Suppliers in 31 countries (Focus: Asia)



Manufacturers from the IT hardware, software and services sectors as well as networks and end devices



661 abnormalities

(2023: 890, with the same number of audits) detected in relation to supplier requirements

These abnormalities are divided as follows: 292 abnormalities in the area of occupational safety and health protection, 123 abnormalities in working hours, 75 abnormalities in environmental protection, 70 abnormalities in wages and compensation, 43 abnormalities in ethics, 39 abnormalities in working conditions, nine abnormalities in discrimination, eight abnormalities in freedom of association, and two abnormalities in disciplinary actions.

All identified abnormalities were recorded in a plan for corrective and preventive actions. We are monitoring the timely implementation of the defined measures.

The results of the audits are included in the annual risk analysis in accordance with the LkSG. During the year, a committee of central departments discusses the results of the audits that we have carried out as part of the JAC initiative. Any abnormalities found must be mitigated or remedied as part of the established audit management.

You can find out more about the audits at our suppliers and as part of the JAC initiative in our

Sustainability Statement 2024

Looking ahead

At almost 70 %, the share of our purchasing volume verified as non-critical in the year under review was once again above our target value for 2025, almost ten percentage points. We will continue to check our suppliers for LkSG risk criteria in the future and want to optimize our human rights due diligence processes despite current uncertainties regarding regulatory developments.

Deep Dive for experts

Management & Frameworks

- We have concretized our commitment to respecting and promoting human rights and environmental concerns in our Declaration of Human Rights Principles. It consists of two parts: our Human Rights Code and the LkSG Annual Report. The principles and expectations described in the <u>Code of Human Rights</u> apply equally to our employees as well as to our suppliers and business partners. We continuously review the associated due diligence obligations and adapt the Code as necessary. The last update was in 2023. In the <u>Annual report LkSG</u>, we publish annually the human rights and environmental risks we have prioritized, including measures and expectations derived from them.
- We place the consideration of our principles and values along the supply chain above the <u>Code of conduct</u> for suppliers. Suppliers of solutions that incorporate artificial intelligence (AI) also confirm the requirements of our <u>AI Guidelines</u> for digital ethics.
- Both the Human Rights Code and the Code of Conduct for Suppliers are based on the requirements of the German LkSG.
- T-Mobile US currently does not fall within the scope of the LkSG and has its own <u>Human Rights Statement</u> and <u>Supplier Code of</u> <u>Conduct</u>. In addition, the T-Mobile US <u>Responsible Sourcing Policy</u> applies to the procurement of goods that use raw materials that are potentially mined in conflict-affected or high-risk regions. As a U.S.-listed company, T-Mobile US also conducts a companyspecific risk assessment using its own methodology.
- With the whistleblower portal "<u>TellMe</u>" and where relevant the T-Mobile US "<u>Integrity Line</u>", we offer all employees and outsiders the opportunity to report violations of legal provisions and internal company regulations – anonymously if desired. This also includes references to human rights or environmental risks and violations.
- Further information on the fulfilment of our due diligence obligations can be found in the reporting to the supervisory authority in accordance with LkSG (BAFA report) on our <u>website</u>.

Relevant standards

- Global Reporting Initiative (GRI)
 - GRI 407-1 (Freedom of association and the right to collective bargaining)
- GSM Association (GSMA) Indicators for Telecom Providers
 - GSMA-SUP-02 (Supplier assessment)

Other sources of information on human rights

- Sustainability Statement in the Annual Report 2024
- Human rights at Deutsche Telekom
- (i) Sustainable supply chains
- Corporate Responsibility Reporting Hub from T-Mobile US

Sustainable finance: decisions for the future

When selecting stocks, investors pay attention not only to financial performance indicators, but also to the so-called ESG criteria: that is, they take into account a company's actions in the areas of environment (E), social (S) and governance (G). In order to meet the demands of financial market players, we have our sustainability performance independently assessed. We also incorporate ESG criteria into our own investments. When working with the tax authorities – for example on the subject of taxes – we rely on transparency and trust.

Our approach

As a public limited company, we are dependent on the capital market and the financial market participants. We want to respond to this target group in a forward-looking and transparent way. To this end, we map our performance using performance indicators in the areas of environmental, social and governance (ESG KPIs), participate in ratings and rankings, and regularly participate in investor dialogues. Sustainability also plays an important role in our own financing decisions – capital investments, for example, or investments in research and development initiatives.

Our focus areas in sustainable finance

- Climate protection
- Transition to a circular economy
- Cybersecurity
- Artificial Intelligence and ESG
- Social aspects (e.g., equal treatment, fair pay)
- Governance

The T-share in sustainability ratings and indices

For more than two decades, we have been participating in various ESG ratings with our shares (T-shares). How we select them depends on their financial market relevance, independence, quality of analysis and the strategic relevance of the results. If the T-share receives a good ESG rating from the rating agencies, it will be listed in corresponding sustainability indices on the financial market.

In 2024, the T-share was again listed in major sustainability indices, including the "Best European Telecommunications Company" category in S&P's Dow Jones World. It was also again listed in CDP's Climate A-List.

Here is a selection of the listings of the T-share:

Rating agency	Indexes/ratings/ranking	Successfully listed in index					
		2024	2023	2022	2021	2020	
S&P CSA	Dow Jones Best-in-Class World Index	~	\checkmark	\checkmark	\checkmark	\checkmark	
	Dow Jones Best-in-Class Europe Index	~	~	~	~	~	
	S&P ESG Index Series	~	\checkmark	\checkmark	\checkmark	~	
CDP	STOXX Global Climate Change Leaders	~	~	~	~	~	
	Supplier Engagement A-List	~	\checkmark	\checkmark	\checkmark	~	
MSCI	ESG Universal Indexes	~	\checkmark	\checkmark	\checkmark	~	
ISS-ESG	Prime Status (Sector Leader)	~	\checkmark	\checkmark	\checkmark	~	
Bloomberg	Gender Equality Index ^a	~	\checkmark	\checkmark	\checkmark	~	
Sustainalytics	STOXX Global ESG Leaders ^b	~	\checkmark	\checkmark	\checkmark	\checkmark	
FTSE Financial Times Stock Exchange	FTSE4Good	~	\checkmark	\checkmark	\checkmark	~	

✓ Listed × Not listed

a Classification for the reporting year is based on the evaluation from 2023.

b Listed in other indexes in the relevant universe.

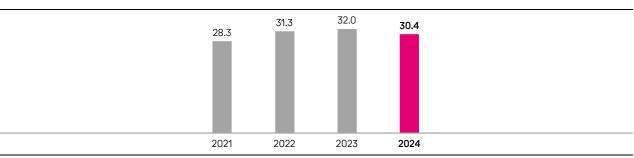
For sustainability reasons: investments in the T-share

Investment products in the area of SRI (Socially Responsible Investments) consist of securities of companies that are successfully assessed according to ESG criteria. The development of demand for the T-share in this investment category serves as an indicator for us to assess our sustainability performance.

The ESG KPI "Sustainable Investment" indicates the proportion of Deutsche Telekom shares held by investors with SRI investment intentions. As of December 31, 2024, it was around 30.4 % of the T-shares. (Source: Nasdaq)

ESG KPI "Socially Responsible Investment (SRI)"





T-Shares held by investors who show concern for environmental, social and governance criteria in their investment choices. We refined the methodology in 2022 and have switched to monitoring sustainably managed shares at fund level and no longer at an institutional level. For better comparability with other companies, the total number of shares given pertains to the number of Deutsche Telekom shares in free float. The figures for previous years have been adjusted accordingly.

We focus on sustainable investments

We want to make our investments financially attractive and in line with ESG criteria – both for money we invest as an investor and for bonds to raise debt capital for investments. To this end, the Corporate Responsibility and Treasury (financial management) divisions regularly evaluate sustainable and attractive financing models.

Since 2019, Deutsche Telekom's capital investment (the socalled DT Trust) has been based on ecological and social standards. DT Trust is guided by the criteria of the National Pension Fund of Norway ("Norges"). In this way, we exclude, among other things, companies that violate human rights, produce certain weapons or whose core business is considered harmful to the environment.



Our commitment to research and development



As a future-oriented telecommunications company, we work closely with universities, other industries and partners and participate (financially) in current innovations. Here is a selection:

- How can clubs, associations or committed citizens be better involved in coping with crisis and disaster situations? T-Systems has been working on a solution for this since 2023 together with partner organizations from civil protection, science and industry in the "KatHelfer PRO" project. So far, for example, a chatbot has been developed that can schedule registered helpers for an assignment.
- More and more people are using streaming services to watch movies, series and clips. This consumes a lot of energy. Since 2023, we have been working closely with various stakeholders to research to make this increasing media use more energy-efficient, among other things. In the year under review, we published a joint <u>guide</u> for decision-makers, development teams and consumers to help them assess the energy needs of video streaming and promote more sustainable criteria.

Together with companies from the high-tech, hardware and chemical sectors, we have developed an approach to reuse components from old equipment for the production of new equipment. A first prototype is the NeoCircuit router: It uses central electronic components from old smartphones. More than half of the resources used consist of reused or recycled sources. More details about the router can be found here in the CR report under <u>Circular Economy</u>.

Further information on our innovations can be found in the Annual Report 2024.

Managing taxes responsibly and transparently



The Group Tax department is responsible for ensuring that the Deutsche Telekom Group pays taxes at the national and international level in accordance with the applicable laws. This includes the Group's income taxes, as well as VAT and income tax on salaries payable and other taxes that are triggered for the Group.

Group Tax also ensures that the Group has an efficient tax structure within the framework of German and foreign tax laws as applicable in each country. In the view of Group Tax, it is essential to cooperate transparently and trust-based with local tax authorities to achieve sustainable tax efficiency, for example, in connection with operationally advisable company reorganizations.

In addition, Group Tax undertakes to contribute as much as possible to the success of Deutsche Telekom's operations, e.g., by providing detailed advice regarding new business models or innovative technological developments. In particular any unresolved issues related to tax law are clarified directly and practical solutions to meeting all applicable tax requirements are provided.

The company's "Tax Compliance, Sustainable Tax Efficiency, Tax as Valued Business Partner" tax strategy (incl. tax policy) has been approved by the Deutsche Telekom Board of Management.

For detailed information on the work of Group Tax, its principles, and its responsible approach to taxation, please refer to the detailed document "Taxes".

🕭 Further information with regard to taxation of Deutsche Telekom 🕤

Additional information with regard to our taxes – for example, about our country-based reporting, and additional details about tax rates – is provided in the documents on <u>Country-by-Country Reporting</u> and the <u>Cash Tax Rate Reconciliation</u>.

In addition, Deutsche Telekom participates in initiatives aimed at developing a comprehensive approach to determining and publishing meaningful information about tax payments by enterprises and enterprise groups. The aim is to give a full and differentiated view of the various contributions to the financing of the public domain that are made in connection with or otherwise result from enterprises and entrepreneurial activities. In this context, for some years now, Deutsche Telekom has determined "Total Tax Contribution" figures for our key national companies in the telecommunications sector. This approach is explained in greater detail in the document on <u>Total Tax Contribution</u>, which also contains the respective information relating to our Group. Deutsche Telekom also intends to collect and publish such information in the coming years, and to potentially extend its scope to additional national companies.

Looking ahead

For more than 20 years, we have had the T-share evaluated in sustainability ratings and rankings and also include ESG criteria in our own investments. In order to consolidate our position as a leading digital and sustainable telecommunications company, we will continue to focus on performance and transparency vis-à-vis financial market players in the future.

Deep Dive for experts

Management & Frameworks

- Deutsche Telekom is guided by the EU's Sustainable Finance Disclosure Regulation (SFDR). It primarily applies to financial companies that are required to incorporate sustainability factors into their investment decision-making processes and collect corresponding data on the sustainability impact of their investments. However, companies outside the financial sector are also affected, which is why we have <u>tabled</u> the most important possible Principle Adverse Impacts (PAI) on sustainability aspects for our investors and financial service providers.
- The EU's Taxonomy Regulation aims to encourage investment in companies that are responsibly managed and implement sustainable economic activities. Its goal is to create a uniform understanding of sustainable activities and investments. At present, it does not include criteria related to an economic activity "provision and operation of electronic communications networks and services" the essential part of our business model. Therefore, we cannot show our contribution to climate protection in the area of network expansion and operation for fixed and mobile networks in accordance with the EU taxonomy. In various business and industry associations, we are committed to the inclusion of relevant and appropriate criteria for mapping our core activities in the EU taxonomy. In 2024, we have therefore developed a joint position paper with individual associations: It underlines the important contribution that our industry is making to achieving Europe's digitalization and climate goals. Detailed information on the EU taxonomy can be found in our <u>Sustainability Statement 2024</u>.

Relevant standards

Task Force on Climate-related Financial Disclosures (TCFD)

• The most important key figures for measuring and managing climate-related opportunities and risks

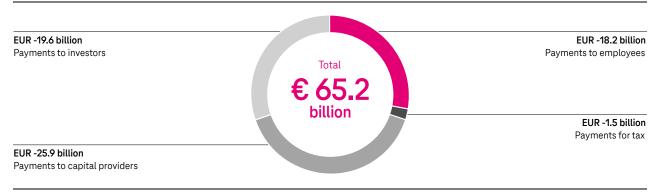
Learn more about taxes

- Tax strategy
- Country-by-Country Reporting 2023
- Cash Tax Rate Reconciliation
- Total Tax Contribution

Net value added

In the year under review, we recorded net value added of EUR 65.2 billion. The year-on-year decline (EUR 68.3 billion) is mainly due to significantly lower repayments to investors. In contrast, investments in intangible assets (especially spectrum licenses) and our investments in grid expansion increased in 2024. Payouts for employees also increased, partly due to the restructuring expenses recognized in the previous year in the United States operating segment. Lower headcount in the Germany, United States and Europe operating segments as well as in the Group Headquarters & Group Services segment had a negative impact on personnel expenses. This was counteracted by the agreed salary increases from the 2023 and 2024 collective bargaining agreements in Germany and abroad.

Net value added



In contrast to the income statement, only actual cash flows are included in the net value added account. This means that, for example, deferred tax expenses and the recognition of provisions do not affect the net value added in the reporting year. Although these expenses reduce the consolidated net income in the income statement, they are not associated with a payment to a stakeholder group, as is the case with net value added. The payments for this will only be made in the future and can therefore only be taken into account in the net value added in the following years.

Other sources of information on sustainable finance

- Sustainability Statement in the Annual Report 2024
- (i) Key financial figures in the Annual Report 2024

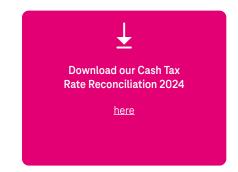
Tax strategy



Country-by-Country Reporting 2023



Cash Tax Rate Reconciliation 2024



Total Tax Contribution



Political advocacy

We stand for political advocacy based on ethical principles and legal requirements. At Deutsche Telekom, we are committed to the core interests of our company in relation to our business models and operational concerns in a variety of ways. In addition, the focus is also on topics such as digital innovations or the interaction of climate protection and digitalization. In doing so, we always act in accordance with our values and guidelines.

We deal with our consumer policy commitment separately under <u>Consumer protection</u> here in the CR report. We address other stakeholder groups such as employees and investors in our <u>Sustainability Statement</u>.

Our approach

As a matter of principle, all employees are required to comply with our existing Group guidelines. The following requirements apply in particular to employees in the field of political advocacy:

- Principles for donations in the political sphere
- Acceptance and Granting of Benefits Policy
- Anti-Corruption and Other Conflicts of Interest Policy
- Consultant Policy
- Sponsoring Policy
- Donation Policy

This overall set of rules forms the basis for open, transparent and legally compliant political representation of interests.

Values and instruments for political representation

When working in parliaments, governments and social organizations, objective communication, competence, credibility and integrity are important to us. In our Code of Conduct, we have stipulated that our partners in politics, associations and other social groups must maintain their independence and integrity. Donations to political institutions, parties and elected officials, for example, are prohibited.

Deutsche Telekom is registered in the EU public transparency register for interest representatives. In Germany, we have been registered in the lobby register for the representation of interests vis-à-vis the German Bundestag and the Federal Government since its introduction. As part of our participation in associations and corresponding committees, we are of course committed to complying with all ethical principles and legal requirements.

P Central topics for our advocacy in 2024:

- Fiber-optic and 5G expansion
- Public safety/resilience and cybersecurity
- European and sovereign cloud ecosystem
- Platform regulation
- Green ICT
- Fair Share (fair cost distribution in grid expansion)
- Artificial intelligence
- Future of Digital Network Infrastructure
- EU Taxonomy

Transparency on lobbying expenditures

Through membership fees and donations, we support associations and other associations, for example, financially. So far, there is no overarching definition of lobbying expenditure. That is why we publish our lobbying expenditures in accordance with the applicable transparency requirements:



- In Germany at the federal level (in accordance with the Act on the Introduction of a Lobby Register for the Representation of Interests vis-à-vis the German Bundestag and the Federal Government [Lobbyregister Act – LobbyRG]) and
- in the federal states of Baden-Württemberg and Bavaria (in accordance with the Transparency Register Act [<u>TReg</u>] in Baden-Württemberg and in accordance with the Bavarian Lobby Register Act [<u>BayLobbyRG</u>]),
- in Brussels (in accordance with the "Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register") and
- in Washington for T-Mobile US (pursuant to the Lobbying Disclosure Act [LDA]).

Support for associations

Active participation in associations is a central component of our representation of interests. Therefore, membership fees for top, professional and industry associations make up the largest share of our expenditure in this area. In the following overview, we transparently show our highest premium payments over the last three years:

Category	Institution	2024	2023	2022	2021
Annual total monetary contributions/ donations (in EUR)	Trade associations	< 5,000,000 ^a	< 5,000,000 ^a	< 5,000,000 ^a	< 5,000,000 ^a
	Political parties	-	-	-	-
Largest single annual contributions (in EUR)	(Deutsche) Industrie- und Handelskammer (IHK/DIHK)	3,649,643	2,908,695	2,608,477	2,278,611
	Bundesverband der deutschen Industrie (BDI e.V.)	474,995	474,995	476,928	520,929
	Bundesvereinigung der Deutschen Arbeitgeberverbände (BDA)	443,000	443,000	400,407	400,407
	Bitkom e.V.	376,833	376,833	368,284	343,085

^a The above figures for contributions to trade associations mean "less than 5 million euros per year" (the actual values may vary from year to year; the value given is a rounded maximum value). Deutsche Telekom does not make contributions, grant advantages or give benefits of any kind, directly or indirectly, to political parties, political movements, or trade unions or their representatives or candidates, except as required by applicable laws and regulations.

Our commitment to an open Internet

We are committed to the EU regulations for an open internet. In order to cope with the rapidly growing data traffic and enable innovation, we are constantly expanding our infrastructure. This will enable us to meet the increasing demand for high-quality services and meet the expectations of online content and application providers.

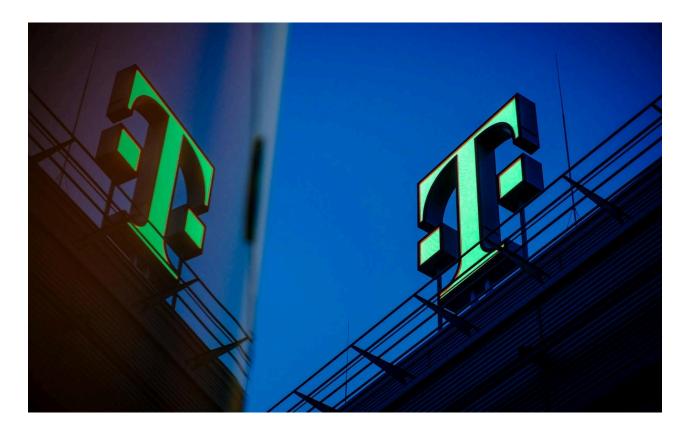
Together with other telecommunications companies, we offer the latest network architecture nationwide – 5G networks – which better and more flexibly maps the different transmission quality requirements of specific services. In this way, we meet the expectations of business and politics and promote innovation in the services offered via our networks. There is no control of content. In the future, we will continue to rely on cooperation with competitors for services with guaranteed quality features.

Our contribution to the EU Green Deal

The telecommunications industry can use innovative technologies and modern digital infrastructure to promote sustainable solutions and help reduce greenhouse gas emissions. In this way, telecommunications companies can contribute to achieving the goals of the EU's Green Deal. Our ambitious climate targets support the principles of the Green Deal. We are continuously investing in <u>network</u> <u>expansion</u> and enabling the development of a resilient infrastructure – the basis for digital solutions to protect the climate. We are also constantly improving the <u>energy and resource efficiency</u> of our grids and data centers and are working on circular products. Further information can be found here in the CR report under <u>Environmentally friendly products and services</u>.



<u>website</u>



Looking ahead

Our political commitment to a more sustainable, digital future is characterized by transparency and integrity. We are committed to becoming the world's leading digital and sustainable telecommunications company. Together with other stakeholders, we have the opportunity to drive technological change and answer important questions for the future of ecology, economy and society.

Deep Dive for experts

Relevant standards

- Global Reporting Initiative
 - GRI 2-28 (Strategy, policies and practices)
 - GRI 2-29 (Stakeholder engagement)
 - GRI 415 3–3 (Political influence)
 - GRI 415-1 (Political influence)

Overview of memberships and cooperations

Business and industry associations

- Bitkom e.V.
- Federation of German Industries (BDI)
- Connect Europe
- Forum for Sustainable Development of the German Economy (econsense)
- GSM Association (GSMA)
- Next Generation Mobile Networks (NGMN)
- International Telecommunication Union (ITU)
- TM Forum

Climate and Environmental Protection Organizations

- B.A.U.M. e.V.
- Climate Neutral Data Centre Pact
- Eco Rating Consortium
- European School of Management and Technology (ESMT)
- Global e-Sustainability Initiative (GeSI)
- Joint Alliance for CSR (JAC)

- RE100
- Solar Impulse Foundation
- Stiftung KlimaWirtschaft (German CEO Alliance for Climate and Economy)
- UN Global Compact

Social Issues Organizations

- Aktion Deutschland Hilft e.V.
- Amadeu Antonio Foundation
- <u>Bundesarbeitsgemeinschaft der Senioren-Organisation (BAGSO)</u> (German Association of Senior Citizens' Organizations)
- Alliance against cyberbullying e.V.
- Business Council for Democracy (BC4D)
- Diversity Charter
- Charter Digital Networking
- CORRECTIV
- Cyberbullying Prevention e.V.
- The NETZZ
- Germany Safe on the Net (DsiN)
- Digital Heroes
- Diskutier Mit Mir e. V.
- DKMS
- EDAD Design für alle e.V.
- eSports Player Foundation
- feelee
- FemTec
- Freunde f
 ürs Leben e.V.
- Gesicht zeigen! For a cosmopolitan Germany e.V.
- HateAid
- hatefree
- ichbinhier e.V.
- JUUUPORT e.V.
- Kompetenzzentrum Technik Diversity Chancengleichheit e.V. (kompetenzz)
- Managerfragen.org
- 100 % HUMAN
- Number against grief
- REspect! Central station
- Sozialhelden e.V.
- Telephone Counselling
- UN Women Deutschland e.V.
- Violence Prevention Network
- WEISSER RING (German WHITE RING)

Research institutions

- Ben-Gurion University
- German Aerospace Center
- Fraunhofer Institute
- Leipzig Graduate School of Management
- Heinrich Hertz Institute for Applied Research
- University of Applied Sciences in Leipzig
- Environmental Campus Birkenfeld
- University cooperation: University of Freiburg, University of Paderborn, University of Stuttgart, TU Munich, TU Berlin, TU Dresden

Other sources of information on Political Advocacy

Code of Conduct Deutsche Telekom