

GRI content index and Global Compact progress report

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The Telefónica Deutschland Group's 2021 CR Report was prepared in accordance with the Comprehensive option of the GRI Standards. The Telefónica Deutschland Group is also

committed to upholding the ten principles of the United Nations Global Compact (UNGC) at the GC Active level; these cover the areas of human rights, labour standards, environmental

protection and anti-corruption. The GRI content index therefore also illustrates which of the stated GRI indicators simultaneously cover one or more of the UNGC principles.

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles	
GRI 101: Foundation 2016					
GRI 102: General disclosures 2016					
Organisational profile					
GRI 102: General disclosures 2016	102-1	Name of the organisation	• Portrait of the company (pp. 6–7)		
	102-2	Activities, brands, products and services	• Portrait of the company (pp. 6–7)		
	102-3	Location of headquarters	• Portrait of the company (pp. 6–7)		
	102-4	Location of operations	• Portrait of the company (pp. 6–7)		
	102-5	Ownership and legal form	• Portrait of the company (pp. 6–7) • AR (Management Report) (pp. 5–56)		
	102-6	Markets served	• Portrait of the company (pp. 6–7)		
	102-7	Scale of the organisation	• Portrait of the company (pp. 6–7) • AR (Management Report) (pp. 5–56)		
	102-8	Information on employees and other workers	• Designing the work environment (pp. 80–87) • Table of key figures for employees (pp. 141–145)	Seasonal fluctuations and a breakdown by contract workers are not relevant. This applies to all the employee figures.	
	102-9	Supply chain	• Supply chain management (pp. 40–48) • Table of key figures for supply chain (pp. 139–140)		
	102-10	Significant changes to the organisation and its supply chain	• AR (Consolidated Financial Statements) (pp. 57–125) • AR (Management Declaration) (pp. 146–153)		
	102-11	Precautionary Principle or approach	• Responsible Business Plan 2025 (pp. 10–14) • Energy and CO ₂ (pp. 94–103) • Circular economy (pp. 104–111)		7 Businesses should support a precautionary approach to environmental challenges.
	102-12	External initiatives	• Digital access (pp. 118–121) • Digital skills (pp. 113–117) • Supply chain management (pp. 40–48) • Compliance and ethical principles (pp. 30–34) • Data protection and information security (pp. 35–39) • Transparency and dialogue (contribution to the SDGs) (p. 24)		

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
	102-13	Membership of associations	<ul style="list-style-type: none"> • Data protection and information security (pp. 35–39) • Energy and CO₂ (pp. 94–103) • Memberships (pp. 150–151) 	
Strategy				
GRI 102: General disclosures 2016	102-14	Statement from senior decision-maker	<ul style="list-style-type: none"> • Foreword (pp. 4–5) 	Management statement regarding the company's ongoing commitment to the UN Global Compact and to further efforts to implement and promote the ten principles.
	102-15	Key impacts, risks and opportunities	<ul style="list-style-type: none"> • Responsible Business Plan 2025 (pp. 10–14) • AR (Management Report) (pp. 5–56) • Energy and CO₂ (pp. 94–103) <p>The concrete impacts, opportunities and risks are presented for each material CR topic when it is first addressed.</p>	
Ethics and integrity				
GRI 102: General disclosures 2016	102-16	Values, principles, standards, and norms of behaviour	<ul style="list-style-type: none"> • Compliance and ethical principles (pp. 30–34) • AR (Management Declaration) (pp. 146–153) • Human rights due diligence (pp. 49–55) 	
	102-17	Mechanisms for advice and concerns about ethics	<ul style="list-style-type: none"> • Compliance and ethical principles (pp. 30–34) • AR (Management Declaration) (pp. 146–153) 	
Governance				
GRI 102: General disclosures 2016	102-18	Governance structure	<ul style="list-style-type: none"> • Governance for responsible corporate management (pp. 16–21) • AR (Management Report) (pp. 5–56) • AR (Management Declaration) (pp. 146–153) 	
	102-19	Delegating authority	<ul style="list-style-type: none"> • Governance for responsible corporate management (pp. 16–21) • AR (Management Report) (pp. 5–56) 	
	102-20	Executive-level responsibility for economic, environmental and social topics	<ul style="list-style-type: none"> • Governance for responsible corporate management (pp. 16–21) • Compliance and ethical principles (pp. 30–34) 	
	102-21	Consulting stakeholders on economic, environmental and social topics	<ul style="list-style-type: none"> • Governance for responsible corporate management (pp. 16–21) • Compliance and ethical principles (pp. 30–34) 	
	102-22	Composition of the highest governance body and its committees	<ul style="list-style-type: none"> • AR (Management Declaration) (pp. 146–153) 	
	102-23	Chair of the highest governance body	<ul style="list-style-type: none"> • AR (Management Declaration) (pp. 146–153) 	
	102-24	Nominating and selecting the highest governance body	<ul style="list-style-type: none"> • AR (Supervisory Board Report) (pp. 137–145) • AR (Management Declaration) (pp. 146–153) 	

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
102-25	Conflicts of interest	<ul style="list-style-type: none"> • AR (Consolidated Financial Statements) (pp. 57–125) • AR (Supervisory Board Report) (pp. 137–145) • AR (Management Declaration) (pp. 146–153) • Compliance and ethical principles (pp. 30–34) 		
102-26	Role of highest governance body in setting purpose, values and strategy	<ul style="list-style-type: none"> • Governance for responsible corporate management (pp. 16–21) • AR (Supervisory Board Report) (pp. 137–145) • AR (Management Declaration) (pp. 146–153) 		
102-27	Collective knowledge of highest governance body	<ul style="list-style-type: none"> • AR (Management Declaration) (pp. 146–153) 		
102-28	Evaluating the highest governance body's performance	<ul style="list-style-type: none"> • AR (Management Declaration) (pp. 146–153) 		
102-29	Identifying and managing economic, environmental and social impacts	<ul style="list-style-type: none"> • AR (Management Report) (pp. 5–56) • Non-Financial Report (pp. 5–29) 		
102-30	Effectiveness of risk management processes	<ul style="list-style-type: none"> • AR (Management Report) (pp. 5–56) 		
102-31	Review of economic, environmental and social topics	<ul style="list-style-type: none"> • Governance for responsible corporate management (pp. 16–21) • AR (Management Report) (pp. 5–56) • Energy and CO₂ (pp. 94–103) 		
102-32	Highest governance body's role in sustainability reporting	<p>The Supervisory Board discusses the findings of the audit of the Non-Financial Report and the related performance indicators with the auditors and then passes a resolution based on its own audit. The CR strategy is approved by the Management Board once it has been reviewed. The CR&S department implements the CR reporting on the material topics on the basis of the CR strategy. The Management Board approves the CR Report following review and the Supervisory Board being informed.</p>		
102-33	Communicating critical concerns	<ul style="list-style-type: none"> • AR (Management Declaration) (pp. 146–153) 		
102-34	Nature and total number of critical concerns		This sensitive information is not made publicly available on account of confidentiality and is therefore not published in the sustainability report.	

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
102-35	Remuneration policies	<ul style="list-style-type: none"> • Remuneration Report in AR (Management Report) (p. 152) • Non-Financial Report (pp. 8–9) <p>In 2018 the heterogeneous landscape of various remuneration systems that had developed organically was superseded by a wide variety of elements. The new remuneration model is clear, fair, attractive and geared to Telefónica Germany GmbH & Co. OHG. One aspect of the new remuneration system as set out in the Group-wide works agreement is clear career bands and levels specific to the Telefónica Deutschland Group: each salary band represents a career level. Clearly defined and transparent classification criteria make development within the salary bands and beyond them possible at the same time. This also makes it obvious what requirements are relevant for the next development steps. Senior experts and the majority of executives receive a bonus in addition to their basic salary; this bonus is linked to corporate targets. Commission is, however, planned for marketing staff. With the bonus for senior experts and for executives, we also provide incentives for the achievement of non-financial targets (CSR index).</p>		
102-36	Process for determining remuneration	<ul style="list-style-type: none"> • AR (Management Declaration) (pp. 146–153) • AR (Management Report) (pp. 5–56) 		
102-37	Stakeholders' involvement in remuneration	<ul style="list-style-type: none"> • AR (Management Declaration) (pp. 146–153) • AR (Remuneration Report) (p. 152) 		
102-38	Annual total compensation ratio	<ul style="list-style-type: none"> • Remuneration Report <p>In the domain of Management Board remuneration, we meet the new regulatory requirements and draw up our Remuneration Report in accordance with Section 162 of the Stock Corporation Act (AktG) or the Act on the Implementation of the Second Shareholder Rights Directive (ARUG II). Beyond this, we do not provide any further information. Our Annual General Meeting will take place on 19 May 2022, after which the approved Remuneration report will be available on our website at https://www.telefonica.de/investor-relations/corporate-governance.html.</p>	The information on the median is not available for the reporting period.	
102-39	Percentage increase in annual total compensation ratio	<p>In the domain of Management Board remuneration, we meet the new regulatory requirements and draw up our Remuneration Report in accordance with Section 162 of the Stock Corporation Act (AktG) or the Act on the Implementation of the Second Shareholder Rights Directive (ARUG II). Beyond this, we do not provide any further information. Our Annual General Meeting will take place on 19 May 2022 and the Remuneration Report will be available on our website subsequently.</p> <p>At the end of the Remuneration Report, there is a table that shows the remuneration granted and owed to, among others, the CEO as well as the average remuneration for a full-time employee and the development of this remuneration.</p>	The information on the median is not available for the reporting period.	

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles	
Stakeholder engagement					
GRI 102: General disclosures 2016	102-40	List of stakeholder groups	• Transparency and dialogue (pp. 22–29)		
	102-41	Collective bargaining agreements	• Designing the work environment (pp. 80–87)	Not applicable, since we are not engaged in collective bargaining with trade unions. 18 works council bodies represent the interests of virtually all the employees of the Telefónica Deutschland Group.	3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
	102-42	Identifying and selecting stakeholders	• Transparency and dialogue (pp. 22–29)		
	102-43	Approach to stakeholder engagement	• Transparency and dialogue (pp. 22–29) • Products and service experience (pp. 57–64) • Network quality and coverage (pp. 65–70) • Future employability (pp. 88–92) • Designing the work environment (pp. 80–87) • Data protection and information security (pp. 35–39) • Circular economy (pp. 104–111)		
	102-44	Key topics and concerns raised	• Transparency and dialogue (pp. 22–29)		
Reporting practice					
GRI 102: General disclosures 2016	102-45	Entities included in the consolidated financial statements	• AR (Consolidated Financial Statements) (pp. 57–125)		
	102-46	Defining report content and topic boundaries	• About this report (p. 3) • Responsible Business Plan 2025 (pp. 10–14) • Transparency and dialogue (pp. 22–29)		
	102-47	List of material topics	• Responsible Business Plan 2025 (pp. 10–14)		
	102-48	Restatements of information	• Table of key figures (pp. 139–148) • Energy and CO ₂ (pp. 94–103) • Circular economy (pp. 104–111) • Supply chain management (pp. 40–48)		
	102-49	Changes in reporting	The results of the 2020 materiality analysis were updated in 2021 and serve as the basis for sustainability reporting. • Responsible Business Plan 2025 (pp. 10–14)		
	102-50	Reporting period	• About this report (p. 3)		
	102-51	Date of most recent report	• About this report (p. 3)		
	102-52	Reporting cycle	• About this report (p. 3)		
	102-53	Contact point for questions regarding the report	• About this report (p. 3) • Imprint (p. 159)		

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
	102-54	Claims of reporting in accordance with the GRI Standards		
	102-55	GRI content index		
	102-56	External assurance		
GRI 200: Economic				
Economic performance				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary		
	103-2	The management approach and its components		
	103-3	Evaluation of the management approach		
GRI 201: Economic performance 2016	201-1	Direct economic value generated and distributed		
	201-2	Financial implications and other risks and opportunities due to climate change	We are unable to provide any information relating to the financial implications in the year under review. We are currently working on an approach that will allow us to measure the impacts of climate-induced risks and opportunities on financial planning.	7 Businesses should support a precautionary approach to environmental challenges.
	201-3	Defined benefit plan obligations and other retirement plans		
	201-4	Financial assistance received from government		
Indirect economic impacts				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary		
	103-2	The management approach and its components		
	103-3	Evaluation of the management approach		
GRI 203: Indirect economic impacts 2016	203-1	Infrastructure investments and services supported		9 Businesses should encourage the development and diffusion of environmentally friendly technologies.

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
	203-2	Significant indirect economic impacts	<ul style="list-style-type: none"> • Business strategy (pp. 8–9) • Digital sustainability innovations (pp. 71–78) • Product and service experience (pp. 57–64) • Network quality and coverage (pp. 65–70) 	
Procurement practices				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	
	103-2	The management approach and its components	• Supply chain management (pp. 40–48)	
	103-3	Evaluation of the management approach	• Supply chain management (pp. 40–48)	
GRI 204: Procurement practices 2016	204-1	Proportion of spending on local suppliers	• Table of key figures for supply chain management (pp. 139–140) The term local suppliers covers all domestic suppliers of the Telefónica Deutschland Group who are managed via the Telefónica purchasing model (MCT).	
Anti-corruption				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	10 Businesses should work against corruption in all its forms, including extortion and bribery.
	103-2	The management approach and its components	• Compliance and ethical principles (pp. 30–34)	
	103-3	Evaluation of the management approach	• Compliance and ethical principles (pp. 30–34)	
GRI 205: Anti-corruption 2016	205-1	Operations assessed for risks related to corruption	• Compliance and ethical principles (pp. 30–34)	The total number and percentage of operating sites assessed for risks related to corruption are not reported as the assessments were performed based on processes and not on sites.
	205-2	Communication and training about anti-corruption policies and procedures	<ul style="list-style-type: none"> • Compliance and ethical principles (pp. 30–34) • Human rights due diligence (pp. 49–55) • Table of key figures for compliance and ethical principles (p. 140) 	The data necessary for a breakdown by employee category is not recorded due to the system.
	205-3	Confirmed incidents of corruption and actions taken	• Compliance and ethical principles (pp. 30–34)	
Anti-competitive behaviour				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	10 Businesses should work against corruption in all its forms, including extortion and bribery.
	103-2	The management approach and its components	• Compliance and ethical principles (pp. 30–34)	
	103-3	Evaluation of the management approach	• Compliance and ethical principles (pp. 30–34)	

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
GRI 206: Anti-competitive behaviour 2016	206-1	Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	• Compliance and ethical principles (pp. 30–34)	
GRI 300: Environmental				
Materials				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	7 Businesses should support a precautionary approach to environmental challenges. 8 Businesses should undertake initiatives to promote greater environmental responsibility. 9 Businesses should encourage the development and diffusion of environmentally friendly technologies.
	103-2	The management approach and its components	• Circular economy (pp. 104–111)	
	103-3	Evaluation of the management approach	• Circular economy (pp. 104–111)	
GRI 301: Materials 2016	301-1	Materials used by weight or volume		Not relevant because the Telefónica Deutschland Group is not a manufacturing business.
	301-2	Recycled input materials used		Not relevant because the Telefónica Deutschland Group is not a manufacturing business. O ₂ nevertheless makes information on products and services available online that helps customers evaluate the smartphones offered from a sustainability perspective, from the purchasing decision through to recycling. For more information, see: • Circular economy (pp. 104–111)
	301-3	Reclaimed products and their packaging materials	• Circular economy (pp. 104–111) • Table of key figures for the environment (pp. 147–148) The disclosure 301-3 was adjusted to the concrete conditions of the Telefónica Deutschland Group. The reporting refers to our mobile phone recycling programme, which is not solely based on taking back our own phones. More information about mobile phone recycling can also be found here: www.telefonica.de/handyrecycling .	The Telefónica Deutschland Group does not report on the packaging of mobile phones because it is not a manufacturing business. The company does, however, dispatch its parcels made of recycled materials to the customers and shops climate-neutrally with DHL GoGreen. More information on measures relating to letter and parcel delivery can be found in: • Circular economy (pp. 104–111)

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
Energy				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	<p>7 Businesses should support a precautionary approach to environmental challenges.</p> <p>8 Businesses should undertake initiatives to promote greater environmental responsibility.</p> <p>9 Businesses should encourage the development and diffusion of environmentally friendly technologies.</p>
	103-2	The management approach and its components	• Energy and CO ₂ (pp. 94–103)	
	103-3	Evaluation of the management approach	• Energy and CO ₂ (pp. 94–103)	
GRI 302: Energy 2016	302-1	Energy consumption within the organisation	<ul style="list-style-type: none"> • Energy and CO₂ (pp. 94–103) • Table of key figures for the environment (pp. 146–148) 	Losses where technical gases from air conditioning systems in network and data centres are concerned are integrated into Scope 1 emissions. These emissions are comparatively low. Steam consumption and thermal energy are not relevant because the Telefónica Deutschland Group is not a manufacturing business and electricity consumption accounts for about 97 % of energy expenditure.
	302-2	Energy consumption outside of the organisation		Not relevant for internal corporate governance and not demanded by stakeholders.
	302-3	Energy intensity	<ul style="list-style-type: none"> • Energy and CO₂ (pp. 94–103) • Table of key figures for the environment (pp. 146–148) 	
	302-4	Reduction of energy consumption	• Energy and CO ₂ (pp. 94–103)	
	302-5	Reductions in energy requirements of products and services	• Energy and CO ₂ (pp. 94–103)	
Emissions				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	<p>7 Businesses should support a precautionary approach to environmental challenges.</p> <p>8 Businesses should undertake initiatives to promote greater environmental responsibility.</p> <p>9 Businesses should encourage the development and diffusion of environmentally friendly technologies.</p>
	103-2	The management approach and its components	• Energy and CO ₂ (pp. 94–103)	
	103-3	Evaluation of the management approach	• Energy and CO ₂ (pp. 94–103)	
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	<ul style="list-style-type: none"> • Energy and CO₂ (pp. 94–103) • Table of key figures for the environment (pp. 146–148) • TCFD index (p. 2) 	

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
	305-2 Energy indirect (Scope 2) GHG emissions	<ul style="list-style-type: none"> • Energy and CO₂ (pp. 94–103) • Table of key figures for the environment (pp. 146–148) • TCFD index (p. 2) 		
	305-3 Other indirect (Scope 3) GHG emissions	<ul style="list-style-type: none"> • Energy and CO₂ (pp. 94–103) • Table of key figures for the environment (pp. 146–148) • TCFD index (p. 2) 		
	305-4 GHG emissions intensity	<ul style="list-style-type: none"> • Table of key figures for the environment (pp. 146–148) • TCFD index (p. 2) 		
	305-5 Reduction of GHG emissions	<ul style="list-style-type: none"> • Energy and CO₂ (pp. 94–103) • TCFD index (p. 2) 		
	305-6 Emissions of ozone-depleting substances (ODS)	–	Not relevant. Emissions are recorded but due to their volume they are not material.	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx) and other significant air emissions	–	Not relevant. Emissions are recorded but due to their volume they are not material.	
Waste				
GRI 103: Management approach 2016	103-1 Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)		7 Businesses should support a precautionary approach to environmental challenges. 8 Businesses should undertake initiatives to promote greater environmental responsibility.
	103-2 The management approach and its components	• Circular economy (pp. 104–111)		
	103-3 Evaluation of the management approach	• Circular economy (pp. 104–111)		
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	• Circular economy (pp. 104–111)	For the reporting period, we have no breakdown into upstream and downstream of waste and waste-related impacts.	
	306-2 Management of significant waste-related impacts	• Circular economy (pp. 104–111)	For the reporting period, we have no breakdown into upstream and downstream of waste and waste-related impacts.	
	306-3 Waste generated	• Table of key figures (p. 148)		
	306-4 Waste diverted from disposal	• Table of key figures (p. 148)	For the period under review and due to missing data, no information can be provided about the process used to break down hazardous waste and that for non-hazardous waste diverted from disposal.	
	306-5 Waste directed to disposal	<ul style="list-style-type: none"> • Circular economy incl. key figures for waste (pp. 104–111) • Table of key figures (p. 148) 		

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
Environmental compliance				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	7 Businesses should support a precautionary approach to environmental challenges. 8 Businesses should undertake initiatives to promote greater environmental responsibility.
	103-2	The management approach and its components	<ul style="list-style-type: none"> • Energy and CO₂ (pp. 94–103) • Circular economy (pp. 104–111) • Compliance and ethical principles (pp. 30–34) 	
	103-3	Evaluation of the management approach	<ul style="list-style-type: none"> • Energy and CO₂ (pp. 94–103) • Circular economy (pp. 104–111) • Compliance and ethical principles (pp. 30–34) 	
GRI 307: Environmental compliance 2016	307-1	Non-compliance with environmental laws and regulations	<ul style="list-style-type: none"> • Compliance and ethical principles (pp. 30–34) Compliance with environmental regulations is overseen via the implemented management systems in accordance with ISO 14001 and ISO 50001 within the company.	
Supplier environmental assessment				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	7 Businesses should support a precautionary approach to environmental challenges. 8 Businesses should undertake initiatives to promote greater environmental responsibility. 9 Businesses should encourage the development and diffusion of environmentally friendly technologies.
	103-2	The management approach and its components	• Supply chain management (pp. 40–48)	
	103-3	Evaluation of the management approach	• Supply chain management (pp. 40–48)	
GRI 308: Supplier environmental assessment 2016	308-1	New suppliers that were screened using environmental criteria	<ul style="list-style-type: none"> • Supply chain management (pp. 40–48) New suppliers are required to accept the Supply Chain Sustainability Policy, which includes minimum environmental requirements, in the supplier registration portal. This provides the Telefónica Deutschland Group with information regarding the status of social criteria of 100% of its new suppliers.	
	308-2	Negative environmental impacts in the supply chain and actions taken	<ul style="list-style-type: none"> • Supply chain management (pp. 40–48) • Circular economy (pp. 104–111) 	

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
GRI 400: Social				
Employment				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining. 6 Businesses should uphold the elimination of discrimination in respect of employment and occupation.
	103-2	The management approach and its components	• Future employability (pp. 88–92) • Designing the work environment (pp. 80–87)	
	103-3	Evaluation of the management approach	• Future employability (pp. 88–92) • Designing the work environment (pp. 80–87)	
GRI 401: Employment 2016	401-1	New employee hires and employee turnover	• Table of key figures for employees (pp. 141–145) • Future employability (pp. 88–92)	
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	• Designing the work environment (pp. 80–87)	
	401-3	Parental leave	• Table of key figures for employees (pp. 141–145) • Designing the work environment (pp. 80–87) In accordance with Section 15 of the Federal Parental Allowance and Parental Leave Act (BEEG), all parents in Germany are entitled to parental leave in order to look after and raise a child until they turn three.	
Labour/management relations				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	
	103-2	The management approach and its components	• Designing the work environment (pp. 80–87)	
	103-3	Evaluation of the management approach	• Designing the work environment (pp. 80–87)	
GRI 402: Labour/management relations 2016	402-1	Minimum notice periods regarding operational changes	Implemented according to a resolution passed by the responsible works council bodies in a procedure agreed with these with notice periods agreed jointly that are variable depending on the planned change. The provisions of the Works Constitution Act (BetrVG) are fully taken into account.	
Occupational health and safety				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	
	103-2	The management approach and its components	• Future employability (pp. 88–92)	
	103-3	Evaluation of the management approach	• Future employability (pp. 88–92)	

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles	
GRI 403: Occupational health and safety 2018	403-1	Occupational health and safety management system	<ul style="list-style-type: none"> • Future employability (pp. 88–92) <p>Our integrated occupational health and safety management system applies to:</p> <ul style="list-style-type: none"> - all employees (i.e. internal employees of the Telefónica Deutschland Group with employment contracts), - all other employees (employees of suppliers, consultants, etc. without employment contracts) whose work and/or workplaces are controlled by the Telefónica Deutschland Group and - all other employees (see above) whose work and/or workplaces are not controlled by the Telefónica Deutschland Group, but whose occupational health and safety are nevertheless considerably influenced by the Telefónica Deutschland Group's operating sites or products/services. 		
	403-2	Hazard identification, risk assessment, and incident investigation	<ul style="list-style-type: none"> • Table of key figures (pp. 145–146) 		
	403-3	Occupational health services	<ul style="list-style-type: none"> • Future employability (pp. 88–92) • Table of key figures for employees (pp. 145–146) <p>Based on our Health & Safety Annex, the following requirements are to be met by the employees of our suppliers/service providers prior to work performance (in particular the performance of work conducted at height): work assignment is only permissible if a preventive occupational medical examination (in accordance with the employers' liability insurance association's principle G41 regarding work involving a risk of falls) indicates there are no doubts regarding the physical suitability of the supplier's/service provider's employees.</p>		
	403-4	Worker participation, consultation, and communication on occupational health and safety	<ul style="list-style-type: none"> • Future employability (pp. 88–92) <p>Employer-worker health and safety committees operate in every subsidiary at company level in accordance with the legal regulations (e.g. health and safety committees); as a result of the necessary co-determination rights, however, this is also partly the case at local level per company and there is a nationwide body (Health Forum) at Group level initiated by the employer's side; share of total workforce represented in occupational safety committees and bodies: 100%.</p>		
	403-5	Worker training on occupational health and safety	<ul style="list-style-type: none"> • Table of key figures for employees (pp. 145–146) • Future employability (pp. 88–92) 		
	403-6	Promotion of worker health	<ul style="list-style-type: none"> • Future employability (pp. 88–92) <p>Employers of our external workers who are not employees of the Telefónica Deutschland Group but whose work and/or workplace is controlled by the Telefónica Deutschland Group must afford them access to occupational health care services. Suppliers are to, for example, implement occupational health and safety measures in order to create safe and ergonomic labour conditions for the purchaser's employees and for the external workers too. This is likewise specified in the Health & Safety Annex.</p>		

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	In cases in which the Telefónica Deutschland Group has control neither over the work nor over the workplace, the binding Health & Safety Annex applies, in which the topics of occupational health and safety (e.g. safety regulations) and related measures are outlined for all suppliers and sub-suppliers.		
	403-8 Workers covered by an occupational health and safety management system	• Table of key figures for employees (pp. 145–146)		
	403-9 Work-related injuries	• Table of key figures for employees (pp. 145–146) As far as registered workplace accidents were concerned, the overwhelming majority of these were sustained on the journey to or from work. The goal of preventing workplace accidents and work-related ill health as well as promoting our employees' health using targeted measures is founded on the applicable laws and the regulations of the employers' liability insurance association as well as the targets pursuant to the "Handbuch integriertes Arbeitsschutz- und Gesundheitsmanagement" (Integrated occupational health and safety management manual), which is based on the DIN EN ISO 45001:2016 standard.		
	403-10 Work-related ill health	• Table of key figures for employees (pp. 145–146) There are no groups of employees that are subject to work-related ill health, so there was nothing to report in this regard for the 2021 reporting period.	Due to missing data, no information can be provided for the reporting period regarding workers who are not employees but whose work and/or workplace is controlled by the Telefónica Deutschland Group. In the years to come, it will be examined whether and to what extent collection of this data is possible or material for the Telefónica Deutschland Group.	
Training and education				
GRI 103: Management approach 2016	103-1 Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)		
	103-2 The management approach and its components	• Future employability (pp. 88–92)		
	103-3 Evaluation of the management approach	• Future employability (pp. 88–92)		
GRI 404: Training and education 2016	404-1 Average hours of training per year per employee	• Future employability (pp. 88–92) • Table of key figures (pp. 139–148)	The data necessary for a breakdown by gender and by employee category is not recorded due to the system.	
	404-2 Programmes for upgrading employee skills and transition assistance programmes	• Future employability (pp. 88–92)		

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
	404-3	Percentage of employees receiving regular performance and career development reviews	• Future employability (pp. 88–92)	The data necessary for a breakdown by gender and by employee category is not recorded due to the system.
Diversity and equal opportunity				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	6 Businesses should uphold the elimination of discrimination in respect of employment and occupation.
	103-2	The management approach and its components	• Designing the work environment (pp. 80–87)	
	103-3	Evaluation of the management approach	• Designing the work environment (pp. 80–87)	
GRI 405: Diversity and equal opportunity 2016	405-1	Diversity of governance bodies and employees	• Designing the work environment (pp. 80–87) • Table of key figures for employees (pp. 141–145) • Governance bodies: AR (Management Declaration) (pp. 146–153)	
	405-2	Ratio of basic salary and remuneration of women to men	• Table of key figures for employees (pp. 141–145) The information respectively refers to the entire Telefónica Deutschland Group.	
Non-discrimination				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	6 Businesses should uphold the elimination of discrimination in respect of employment and occupation.
	103-2	The management approach and its components	• Compliance and ethical principles (pp. 30–34) • Designing the work environment (pp. 80–87) Component of our compliance management system	
	103-3	Evaluation of the management approach	• Compliance and ethical principles (pp. 30–34) • Designing the work environment (pp. 80–87) Component of our compliance management system	
GRI 406: Non-discrimination 2016	406-1	Incidents of discrimination and corrective actions taken	• Table of key figures for compliance and ethical principles (p. 140)	
Freedom of association and collective bargaining				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
	103-2	The management approach and its components	• Compliance and ethical principles (pp. 30–34) • Supply chain management (pp. 40–48) Component of our compliance management system	
	103-3	Evaluation of the management approach	• Compliance and ethical principles (pp. 30–34) • Supply chain management (pp. 40–48) Component of our compliance management system	

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
GRI 407: Freedom of association and collective bargaining 2016	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	<ul style="list-style-type: none"> • Compliance and ethical principles (pp. 30–34) 	
Child labour				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	<ul style="list-style-type: none"> • Responsible Business Plan 2025 (pp. 10–14) 	5 Businesses should uphold the effective abolition of child labour.
	103-2	The management approach and its components	<ul style="list-style-type: none"> • Compliance and ethical principles (pp. 30–34) • Supply chain management (pp. 40–48) • Human rights due diligence (pp. 49–55) 	
	103-3	Evaluation of the management approach	<ul style="list-style-type: none"> • Compliance and ethical principles (pp. 30–34) • Supply chain management (pp. 40–48) • Human rights due diligence (pp. 49–55) 	
GRI 408: Child labour 2016	408-1	Business sites and suppliers at significant risk for incidents of child labour	<ul style="list-style-type: none"> • Compliance and ethical principles (pp. 30–34) • Supply chain management (pp. 40–48) • Human rights due diligence (pp. 49–55) No incidents of child labour during the reporting period are known to us.	
Forced or compulsory labour				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	<ul style="list-style-type: none"> • Responsible Business Plan 2025 (pp. 10–14) 	4 Businesses should uphold the elimination of all forms of forced and compulsory labour.
	103-2	The management approach and its components	<ul style="list-style-type: none"> • Compliance and ethical principles (pp. 30–34) • Supply chain management (pp. 40–48) Component of our compliance management system	
	103-3	Evaluation of the management approach	<ul style="list-style-type: none"> • Compliance and ethical principles (pp. 30–34) • Supply chain management (pp. 40–48) Component of our compliance management system	
GRI 409: Forced or compulsory labour 2016	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	<ul style="list-style-type: none"> • Compliance and ethical principles (pp. 30–34) • Supply chain management (pp. 40–48) • Human rights due diligence (pp. 49–55) No incidents of forced labour during the reporting period are known to us.	

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
Human rights assessment				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	<p>1 Businesses should support and respect the protection of internationally proclaimed human rights.</p> <p>2 Businesses should make sure that they are not complicit in human rights abuses.</p>
	103-2	The management approach and its components	<ul style="list-style-type: none"> • Human rights due diligence (pp. 49–55) • Compliance and ethical principles (pp. 30–34) • Supply chain management (pp. 40–48) 	
	103-3	Evaluation of the management approach	<ul style="list-style-type: none"> • Human rights due diligence (pp. 49–55) • Compliance and ethical principles (pp. 30–34) • Supply chain management (pp. 40–48) 	
GRI 412: Human rights assessment 2016	412-1	Operations that have been subject to human rights reviews or impact assessments	• Human rights due diligence (pp. 49–55)	The total number and percentage of operating sites assessed for the upholding of human rights are not reported as the assessments were performed based on processes and not on sites.
	412-2	Employee training on human rights policies or procedures	<ul style="list-style-type: none"> • Human rights due diligence (pp. 49–55) • Compliance and ethical principles (pp. 30–34) • Table of key figures (p. 140) 	
	412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	<ul style="list-style-type: none"> • Human rights due diligence (pp. 49–55) • Supply chain management (pp. 40–48) 	Our suppliers accept the Supply Chain Sustainability Policy, which contains human rights aspects. Beyond this, no clauses specific to human rights are integrated into contracts.
Local communities				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	<p>1 Businesses should support and respect the protection of internationally proclaimed human rights.</p>
	103-2	The management approach and its components	<ul style="list-style-type: none"> • Digital access (pp. 118–121) • Digital skills (pp. 113–117) • Designing the work environment (volunteering) (pp. 80–87) 	
	103-3	Evaluation of the management approach	<ul style="list-style-type: none"> • Digital access (pp. 118–121) • Digital skills (pp. 113–117) • Designing the work environment (volunteering) (pp. 80–87) 	
GRI 413: Local communities 2016	413-1	Operations with local community engagement, impact assessments and development programmes	<ul style="list-style-type: none"> • Digital access (pp. 118–121) • Digital skills (pp. 113–117) • Designing the work environment (volunteering) (pp. 80–87) 	
	413-2	Operations with significant actual and potential negative impacts on local communities	• Digital sustainability innovations (pp. 71–78)	

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
Supplier social assessment				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	1 Businesses should support and respect the protection of internationally proclaimed human rights. 2 Businesses should make sure that they are not complicit in human rights abuses.
	103-2	The management approach and its components	• Supply chain management (pp. 40–48)	
	103-3	Evaluation of the management approach	• Supply chain management (pp. 40–48)	
GRI 414: Supplier social assessment 2016	414-1	New suppliers that were screened using social criteria	• Supply chain management (pp. 40–48)	
	414-2	Negative social impacts in the supply chain and actions taken	• Supply chain management (pp. 40–48)	
Public policy				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	10 Businesses should work against corruption in all its forms, including extortion and bribery.
	103-2	The management approach and its components	• Compliance and ethical principles (pp. 30–34)	
	103-3	Evaluation of the management approach	• Compliance and ethical principles (pp. 30–34)	
GRI 415: Public policy 2016	415-1	Political contributions	• Table of key figures for compliance and ethical principles (p. 140)	
Customer health and safety				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	
	103-2	The management approach and its components	<ul style="list-style-type: none"> • Data protection and information security (pp. 35–39) • Product and service experience (pp. 57–64) • Network quality and coverage (pp. 65–70) 	
	103-3	Evaluation of the management approach	<ul style="list-style-type: none"> • Data protection and information security (pp. 35–39) • Product and service experience (pp. 57–64) • Network quality and coverage (pp. 65–70) 	
GRI 416: Customer health and safety 2016	416-1	Assessment of the health and safety impacts of product and service categories	<ul style="list-style-type: none"> • Product and service experience (pp. 57–64) • Network quality and coverage (pp. 65–70) Compliance with limits is checked by Germany's Federal Network Agency for Electricity, Gas, Telecommunications, Post and Railway (Bundesnetzagentur) at all transmitter masts. More information is available on the website of the Telefónica Deutschland Group, including a current list of mobile phone SAR values: www.telefonica.de/verantwortung/umwelt-und-klima-schuetzen/mobilfunk-gesundheit.html	
	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	None	

GRI Standard	Disclosure	Reference & comment	Reasons for omission	UNGC principles
Marketing and labelling				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	
	103-2	The management approach and its components	• Data protection and information security (pp. 35–39) • Product and service experience (pp. 57–64)	
	103-3	Evaluation of the management approach	• Data protection and information security (pp. 35–39) • Product and service experience (pp. 57–64)	
GRI 417: Marketing and labelling 2016	417-1	Requirements for product and service information and labelling	• Data protection and information security (pp. 35–39) • Product and service experience (pp. 57–64) • Circular economy (pp. 104–111) • Compliance and ethical principles (pp. 30–34)	Further details are not applicable for telecommunications products/services.
	417-2	Incidents of non-compliance concerning product and service information and labelling	• Product and service experience (pp. 57–64) • Circular economy (pp. 104–111) • Compliance and ethical principles (pp. 30–34)	Further details are not applicable for telecommunications products/services.
	417-3	Incidents of non-compliance concerning marketing communications	• Compliance and ethical principles (pp. 30–34) • Product and service experience (pp. 57–64) • Table of key figures (pp. 139–148)	
Customer privacy				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	1 Businesses should support and respect the protection of internationally proclaimed human rights. 2 Businesses should make sure that they are not complicit in human rights abuses.
	103-2	The management approach and its components	• Data protection and information security (pp. 35–39)	
	103-3	Evaluation of the management approach	• Data protection and information security (pp. 35–39)	
GRI 418: Customer privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	• Data protection and information security (pp. 35–39)	
Socioeconomic compliance				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its boundary	• Responsible Business Plan 2025 (pp. 10–14)	
	103-2	The management approach and its components	• Compliance and ethical principles (pp. 30–34)	
	103-3	Evaluation of the management approach	• Compliance and ethical principles (pp. 30–34)	
GRI 419: Socioeconomic compliance 2016	419-1	Non-compliance with laws and regulations in the social and economic area	• Compliance and ethical principles (pp. 30–34) In 2021 no proceedings were initiated on the basis of violation of the order on the means of providing proof as regards limiting exposure to electromagnetic fields (BEMFV). There were also no fines issued as a result in the year under review.	

