Global Human Rights Policy

Telefónica, S.A.

Telefónica, S.A.
2nd Edition approved by the Board of Directors of Telefónica , S.A. at its meeting on 25 September 2025

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Change control

Edition	Modifications
1.0 **(2019)**	First version.
2.0 **(2025)**	Update to align with new regulation in the field of sustainability: CSRD and CSDDD.
2.1 **(2026)**	Correction Procedure: Adaptation of the Policy by removing references to U.S. regulations due to the delisting of Telefónica, S.A. from the NYSE.

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1. Introduction

At Telefónica, we believe that communications technology is a fundamental pillar for the effective exercise of human rights, by facilitating access to information, the exchange of ideas and the generation of opportunities that boost individual and collective development. However, as with any other industry, the telecommunications sector is not immune to potential violations of human rights throughout its **value chain**.

This is why we have a Code of Ethics and Conduct, our Responsible Business Principles, which provides the guidelines we follow as a Company in all we do and demonstrates our commitment to **respecting and promoting internationally recognised human rights**, in line with the **United Nation's Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises**, and the different **international conventions and commitments** on human rights *(10. Reference documents: International regulatory frameworks)*.

This commitment is complemented by this Global Human Rights Policy and, more generally, by the rest of the Company's policies and procedures that safeguard respect for human rights in our operations and value chain.

1.1 Purpose

Through **this Policy,** Telefónica sets out the general principles that constitute minimum requirements and define a **framework of action for the entire Group**, ensuring a consistent approach in line with the international standards on this subject.

The aim of this Policy is to:

- **Reiterate our commitment to human rights**.
- **Establish the starting point of Telefónica's due diligence process** regarding protecting and promoting human rights.

1.2 Scope of application

This policy is **global in scope** and is **mandatory** for all the companies of the Telefónica Group. For these purposes, Telefónica Group shall be understood as those companies in whose share capital Telefónica S.A. directly or indirectly holds the majority of the shares, equity interests or voting rights, or in whose administrative body it has designated or is empowered to designate the majority of the members, in such a way that it effectively controls the company.

Telefónica, S.A., in its capacity as the parent company of the Group, is responsible for establishing the foundations and setting the instruments and mechanisms necessary for appropriate and efficient coordination between this Company and the other companies

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that make up its Group, all this without prejudice or detriment to the autonomous decision-making capacity corresponding to each of these companies, in accordance with the corporate interests of each of them and the legal obligations established in relation to the members of their management bodies.

2. Basic human rights principles relating to our stakeholders.

Telefónica undertakes to respect human rights in its relations with its stakeholders. These commitments are based on an approach to managing impacts, risks and opportunities (IROs) linked to human rights and its due diligence throughout the value chain:

2.1 Customers

We work to offer products and services that contribute to generating a positive impact on the lives of people. To this end, these are the principles that govern our activities:

- Privacy: We seek to ensure the proper processing of personal data with the goal of respecting the fundamental rights and freedoms of individuals and, specifically, the fundamental right to the protection of personal data.

- Cybersecurity: Provide secure and reliable infrastructure and services to ensure the protection of our customers' data, preventing loss, modification, misuse or unauthorised access, and resolving any incidents that may arise in an efficient manner.

- Freedom of expression and information: Respect and work to promote the lawful exercise of the right to freedom of expression in all areas of our activities. All this, without prejudice to the duty to cooperate and respond to the requirements we receive from the competent authorities in these matters, within the legal framework applicable to each situation and in strict compliance with the regulations in force. In this respect, we try to minimise any possible impact on this right arising from such requirements, which must be consistent with the relevant legislation and whose execution must be proportional to the legitimate aim pursued.

- Non-discrimination: Prevent discriminatory treatment in our customer relations, whether to their detriment or advantage, based on skin colour, nationality, geographic and ethnic origin, religion, gender, sexual orientation and gender identity, marital status, age, disability, socio-economic conditions or family responsibilities, in order to facilitate access to our products and services, in the

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customer care processes through our contact channels, in our communication activities or in the use of new technologies.

- Protection of vulnerable groups and individuals: Identify, respect and protect the rights of women, individuals and vulnerable groups, including, among others, children and adolescents, older people, people with disabilities and people experiencing social exclusion.

- Development and responsible use of products and services: Incorporate responsible practices into the design and development of our value propositions, including those based on new technologies, to encourage access to information and to our products and services, and foster control measures that contribute to the health and safety of people during the development and use of such products and services.

2.2 Employees

We have internal policies and processes in place to promote respect for the rights of our employees. These policies and processes are aimed at achieving the following objectives:

- Fair working conditions: Ensuring fulfilment of fair and equitable working conditions for our employees, by promoting measures that are intended to promote secure employment, working times, adequate wages, equal pay for work of equal value, social dialogue and work-life balance.

- Freedom of association and the right to collective bargaining: encourage freedom of association, the existence of works councils and workers' rights to information, consultation and participation, as well as the right to industrial action and the right to collective bargaining regardless of the area where we conduct our operations. Work towards preventing, that membership of trade unions or workers' representative bodies, from placing employees at a disadvantage, such as through discrimination, intimidation or reprisals.

- Health and safety: Provide a physically and mentally safe and healthy work environment at all our facilities through the adoption of occupational health and safety procedures and regulations. Promote mechanisms to achieve work-life balance and the right to rest. Promote the communication and reinforcement of a safety culture, developing awareness of the risk and encouraging responsible behaviour by its workers through information and training sessions, among other activities.

- Diversity, non-discrimination, inclusion and equal opportunities: Promote diversity and equal opportunities and prevent the discriminatory treatment of people all areas of our organisation and particularly of vulnerable groups, without bias

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associated with skin colour, nationality, geographic and ethnic origin, religion, gender, sexual orientation and gender identity, marital status, age, socio-economic situation, disability or family responsibilities, acknowledging the intersectionality of these identities, due to which individuals may face multiple discrimination arising from the combination of several of these. Promote equal salaries among similar positions in similar contexts, rejecting any type of sex-based discrimination in remuneration or promotion. Reject all forms of violence, harassment, threatening or intimidation – whether verbal, physical or sexual – in the workplace.

- Training: Promote training and development of professional and personal abilities in the workplace. Offer continuous learning opportunities that improve employees' skills, support career advancement and foster a culture of continuous improvement, inclusion and ethical awareness at all levels of the organisation.

- Fight against forced labour, modern slavery and child labour: Prohibit and reject any form of forced labour, slavery or human trafficking within our operations. Prevent, detect and correct practices that may give rise to these situations. Respect the rights of children and adolescents. Prohibit and reject the use of child labour in our operations, verifying that, in our hiring processes, all employees are above the local legal minimum working age, respecting, in any case, the provisions of Convention no. 138. of the International Labour Organization.

- Privacy: Ensure the proper processing of personal data with the goal of respecting the fundamental rights and freedoms of individuals and, specifically, the fundamental right to the protection of personal data.

- Cybersecurity: Provide secure and reliable infrastructure and services to ensure the protection of our employees' data, preventing loss, modification, misuse or unauthorised access, and resolving any incidents that may arise in an efficient manner.

2.3 Suppliers and business partners in the value chain

We are committed to diligent management of our relations with suppliers and their employees, contractors and subcontractors, and other business partners.

To this end, we share our sustainability commitments with them through the Telefónica Group's Supply Chain Sustainability Policy and/or establishing contractual clauses in strategic agreements, such as mergers and acquisitions or divestment processes, among others. The Company may require suppliers and partners with significant risks to provide evidence of the integration of due diligence regarding human rights and the environment.

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2.4 Society and environment

We work to contribute to the sustainable growth of the societies in which we are present. To this end, we ensure compliance with the legislation in force in all the markets in which we operate, focusing particularly, due to their impact on the sustainable development of these societies, on the following areas:

- Anti-corruption: Act with honesty and integrity. Fight corruption in its different forms through the implementation of a control environment designed based on the risks and consisting of preventive, detection and response measures, in an environment of evolving and continuous improvement of the model, supported by specific training for our employees on the subject.

- Competitive behaviour: Act in the market honestly and transparently, without engaging in practices that alter free competition and thus respecting the right of consumers to choose freely between competitors.

- Fiscal responsibility: Manage fiscal affairs in compliance with prevailing tax laws at all times, reflecting the true and fair view of the Group through transparency, publicly disclosing fiscal information in a visible, understandable and comprehensive manner.

- Digital inclusion: Boost connectivity in local communities and remote or hard-to-reach areas with the goal of reducing the digital divide. Contribute to initiatives related to digital education and access to technology by vulnerable groups.

- Digital skills: Foster digital skills through initiatives that highlight the opportunities of digitalisation and reduce reticence towards new technologies. Support protection of young people, combating online risks such as incitement to hatred and disinformation. Train parents and educators to foster safe, responsible and informed digital participation for all.

- Stakeholder collaboration: Offer stakeholders reporting and complaint mechanisms, so that they can state their concerns, promoting diligent management of these.

- Communities: Respect the economic, social, cultural, civil and political rights of groups such as local communities, vulnerable groups, minorities and indigenous peoples, with the goal of maintaining collaborative relationships within a framework of trust.

- Environment: Contribute to the protection of the environment and encourage a healthy environment for people, applying the principles contained in the Group's Global Environmental and Energy Policy and other environmental regulations of the Group and its companies.

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In general terms, Telefónica promotes a culture of respect for human rights and actions to educate and raise awareness about this subject among all the people linked to the Company and its other stakeholders.

3. Due diligence

As part of our commitment to respecting human rights and the environment, and as established in the European Corporate Sustainability Due Diligence Directive (CSDDD), as well as in the United Nation's Guiding Principles on Business and Human Rights and other international standards, we have a due diligence process in these matters. The purpose is to identify, assess, monitor and prioritise, on a regular basis, the actual and potential impacts on human rights and the environment, as well as, where appropriate, to implement measures to prevent, mitigate, and remedy or redress any such adverse impacts and their potential repercussions, both in our operations and throughout the chain of activities, and all this in active and transparent dialogue with our internal and external stakeholders.

4. Whistleblowing Channel

Telefónica has an Internal Information System, which includes its Whistleblowing Channel, the preferred mechanism that Telefónica makes available to all employees, executives and directors of Group companies and to third parties who have dealings with them, so that they may report any information concerning them and which may involve:

- a possible irregularity or act contrary to the Responsible Business Principles or any other applicable internal regulation;
- a possible irregularity relating to accounting matters, auditing issues and/or aspects relating to internal control over financial reporting, as referred to regulations applicable to such matters; or
- a possible irregularity or act contrary to the law, including conduct that may constitute a serious or very serious criminal or administrative offence, as well as a breach of European Union law, in relation to activities subject to that legal framework.

The channel is accessible 24/7 via an online form, freephone numbers and email addresses. Reports may be made anonymously, if desired, or the reporting party may include contact details if preferred. The information collected in the report will be handled securely and confidentially. The Compliance area processes any reports received diligently, and promptly proposes action plans for their resolution, in accordance with the

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internal procedures established in Telefónica's Internal Information System Management Policy and its implementing regulations.

5. Responsible Business Queries Channel

The Queries (Responsible Business) Channel is the mechanism available for raising queries related to the Responsible Business Principles.

This channel allows our stakeholders (employees, partners and suppliers, customers and/or users, among others) to send to the Company any query, suggestion and/or question related to actual or potential adverse effects on human rights and the environment that may arise from our own operations and from throughout the rest of the value chain.

It is available 24/7 through the Company's website in several languages The channel allows communications to be made anonymously if the reporting party so wishes. All communications are treated confidentially and examined rigorously.

This channel is managed in accordance with the internal procedure established in Telefónica's Responsible Business Queries Channel Management Regulations.

6. Governance

Telefónica's commitment to respect for and the promotion of human rights throughout the value chain is fostered at the highest level.

The Board of Directors approves this Policy. The Sustainability and Regulation Committee of the Board of Directors is informed on matters related to human rights, in accordance with the functions assigned to it.

The Global Sustainability Department of Telefónica S.A. is responsible, with the support of other corporate areas and the teams of the different Telefónica Group companies, for spearheading the development and the implementation of this Policy.

In addition, they periodically review this Policy within their area of responsibility, depending on the evolution of the Company's sustainability strategy and/or other potentially relevant aspects such as organisational, legal or business changes that may occur at any time.

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7. Disclosure and communication of the Policy

To disseminate and broaden the reach of this Policy, Telefónica publishes it on the corporate website and on its local websites, where appropriate. In addition, it is published internally on corporate channels and the intranet. Through all this, Telefónica promotes access to and awareness of the content of this Policy among all employees and its stakeholders.

Each year, the Company includes information about the implementation of this Policy and its related processes in its sustainability report.

8. Implementation

The implementation of this Policy shall be promoted by the corporate areas whose remit is related to the different matters. Coordination will be conducted through the aforementioned governance, and particularly through the global and local due diligence process.

9. Internal Audit

The Internal Audit Department may perform the analyses and checks deemed appropriate to verify the correct application of the aspects contained in this regulation.

10. Entry into force

This Policy will enter into force following its **approval by the Board of Directors** of Telefónica and repeals the policy previously in force.

Annex: Reference documents

International regulatory frameworks

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

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- International Labour Organization (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- International Labour Organization Declaration on Fundamental Principles and Rights at Work and the International Labour Organization (ILO) fundamental conventions.
- The United Nations Global Compact.
- United Nations International Bill of Human Rights, which includes:
    - The Universal Declaration of Human Rights (UDHR).
    - The International Covenant on Civil and Political Rights (ICCPR).
    - The International Covenant on Economic, Social and Cultural Rights (ICESCR).
- The United Nations Declaration on the Rights of Indigenous Peoples.
- The United Nations Convention on the Rights of the Child.
- The United Nations Convention on the Rights of Persons with Disabilities.
- The United Nations 2030 Agenda for Sustainable Development (SDGs).
- The OECD Due Diligence Guidance for Responsible Business Conduct.
- The European Convention for the Protection of Human Rights and Fundamental Freedoms.
- The European Social Charter and the Charter of Fundamental Rights of the European Union.
- Directive (EU) 2024/1760 of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859.

Internal regulations

In addition, some of the internal regulations that complement this Policy in relation with our commitment to human rights are listed below:

- Supply Chain Sustainability Policy.
- Global Environment and Energy Policy.
- Anti-corruption Policy.
- Global Privacy Policy.
- Global Security Policy.
- Occupational Health, Safety and Well-Being Regulation.

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- Diversity and Inclusion Policy.
- Equality Policy.
- Responsible Communication Regulation.
- Queries Channel Management Regulations.
- Telefónica's Internal Information System Management Policy.
- Regulation on Requests by Competent Authorities.

Other documents:

- Responsible Business Principles.
- Telefónica's Artificial Intelligence Principles: AI Code of Conduct
- Our Customer Relationship Principles.

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