

A large, leafy tree stands in a grassy field under a clear blue sky. A person is sitting on a branch of the tree. The tree's shadow is cast on the grass. The background shows a line of bushes and a path.

# SUSTAINABILITY REPORT

# 2022



Együtt.  
Veled



# GRI CONTENT INDEX

GRI Standards used:

GRI 1: Foundation 2021

GRI 2: General Disclosures 2021

GRI 3: Management Approach 2021

GRI 200: Economic 2016



GRI 300: Environmental 2016

GRI 400: Social 2016

DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERI-ALITY TOPICS	SASB CODE	SDG TARGET														
GRI 2: GENERAL DISCLOSURES 2021																					
1. The organization and its reporting practices																					
2-1	Organizational details		<a href="https://www.telekom.hu/about_us/imprint">https://www.telekom.hu/about_us/imprint</a> <a href="https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf">https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf</a> <a href="https://www.telekom.hu/about_us/investor_relations/magyar_telekom_shares/ownership_structure">https://www.telekom.hu/about_us/investor_relations/magyar_telekom_shares/ownership_structure</a>	<p>The registered company name of Magyar Telekom is Magyar Telekom Telecommunications Public Limited Company, and its abbreviated name is Magyar Telekom Plc.</p> <p>The headquarters of the Group are located in Budapest (IX., Könyves Kálmán krt. 36.).</p> <p>The Group's area of operation: Hungary, Macedonia, Bulgaria and Romania.</p> <table><tr><th>SHAREHOLDERS</th><th>OWNERSHIP (%)</th></tr><tr><td>Deutsche Telekom Europe B.V.</td><td>61,39%</td></tr><tr><td>Other foreign institutions</td><td>13,92%</td></tr><tr><td>Domestic institutions</td><td>5,91%</td></tr><tr><td>Domestic inviduals</td><td>8,79%</td></tr><tr><td>Treasury shares</td><td>4,28%</td></tr><tr><td>Other</td><td>5,71%</td></tr></table> <p>Deutsche Telekom Europe B.V. (formerly called CMobil B.V.) is 100% owned by Deutsche Telekom Europe Holding B.V., whose 100% owner is Deutsche Telekom Europe Holding GmbH (formerly called T-Mobile Global Holding Nr. 2 GmbH) and Deutsche Telekom Europe Holding GmbH is 100% owned by Deutsche Telekom AG, as a result Deutsche Telekom AG has 61.39% indirect ownership in Magyar Telekom. (As of June 30, 2022)</p>	SHAREHOLDERS	OWNERSHIP (%)	Deutsche Telekom Europe B.V.	61,39%	Other foreign institutions	13,92%	Domestic institutions	5,91%	Domestic inviduals	8,79%	Treasury shares	4,28%	Other	5,71%			<div><div>8</div><div>DECENT WORK AND ECONOMIC GROWTH</div></div> <div><div>10</div><div>REDUCED INEQUALITIES</div></div>
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2-2	Entities included in the organization's sustainabi- lity reporting			<p>The Group's segments are reported in a manner consistent with the internal reporting provided to the CODMs, the key management of Magyar Telekom Plc. From 2020 the Chief Executive Officer (CEO) and the other Chief Officers together (Chief Officers) fulfill the chief operating decision maker (CODM) function in the Group. The Chief Officers assess the performance of the Group and make their decisions. Magyar Telekom's operating segments are: MT-Hungary and North Macedonia.</p> <p>The MT-Hungary segment operates in Hungary, providing mobile and fixed line telecommunications, TV distribution, information communication and system integration services to millions of residential and business customers under the Telekom brand (as the earlier used T-Systems brand was ceased to be used in November 2022). Residential, Small and Medium sized business as well as business customers (corporate and public sector customers) are now served by the unified Telekom brand. The MT-Hungary segment is also responsible for the wholesale of mobile and fixed line services within Hungary, and performs strategic and crossdivisio- nal management, as well as support functions on behalf of the Group, including Procurement, Treasury, Real Estate, Accounting, Tax, Legal and Internal Audit. This segment is also responsible for the Group's points of presence in Bulgaria and Romania, where it primarily provides wholesale services to local companies and operators. The latter two entities are part of the audited consolidated financial statements, but the Magyar Telekom Group's sustainability reporting does not cover these two areas. In an effort to ensure completeness, all member companies with a significant impact on sustainability are included in the reporting.</p> <p>In Magyar Telekom's Group-wide reporting, we strive to include all entities in all topics, as long as the data or process is relevant for the entity in question. The data presented in the report can be compared over time by tracking changes in the composition of the Group, aided by the table in the direct response to indicators 2-6.</p> <p>In identifying the material issues, the Group has not differentiated between entities</p>			TC-TL-520a. 2														
2-3	Reporting period, frequ- ency and contact point		<a href="https://www.telekom.hu/static-tr/sw/file/magyar-telekom-sustainability-report-2020.pdf">https://www.telekom.hu/static-tr/sw/file/magyar-telekom-sustainability-report-2020.pdf</a> <a href="https://www.telekom.hu/about_us/society_and_environment/sustainability_reports/">https://www.telekom.hu/about_us/society_and_environment/sustainability_reports/</a>	<p>Magyar Telekom releases its sustainability report on an annual basis, as the financial report and consolidated annual report. The period reported for the Sustainability Report is also 1 January 2022 to 31 December 2022. The figures in the report correspond to the situation on 31 December 2022.</p> <p>Should you have any questions or queries on the report, please do not hesitate to write to the following e-mail address: sustainability@telekom.hu</p>																	

## 2. Activities and workers






DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERI-ALITY TOPICS	SASB CODE	SDG TARGET																																																																																																																																																
2-6(2)	Activities, value chain and other business relationships	Our Approach (5) Stakeholders - Suppliers (43)	<a href="https://www.telekom.hu/about_us/about_magyar_telekom/magyar_telekom_group">https://www.telekom.hu/about_us/about_magyar_telekom/magyar_telekom_group</a>  <a href="https://www.telekom.hu/static-tr/sw/file/financial_report_21q4_en.pdf">https://www.telekom.hu/static-tr/sw/file/financial_report_21q4_en.pdf</a>	<h3>Number of suppliers at different procurement areas</h3> <table><thead><tr><th>AREA</th><th>DESCRIPTION</th><th>NUMBER OF SUPPLIERS IN 2018</th><th>NUMBER OF SUPPLIERS IN 2019</th><th>NUMBER OF SUPPLIERS IN 2020</th><th>NUMBER OF SUPPLIERS IN 2021</th><th>NUMBER OF SUPPLIERS IN 2022</th></tr></thead><tbody><tr><td>Network</td><td>wire and wireless network, transmission technology, backbone network</td><td>342</td><td>319</td><td>320</td><td>337</td><td>319</td></tr><tr><td>IT</td><td>hardware, software procurement, IT Consulting &amp; Contracting, IT-operations and desktop-services, OSS, BSS</td><td>331</td><td>287</td><td>280</td><td>271</td><td>236</td></tr><tr><td>CPE &amp; Noncore</td><td>special projects and terminals, functional area</td><td>86</td><td>130</td><td>119</td><td>69</td><td>84</td></tr><tr><td>Indirekt</td><td>marketing, low cost suppliers, fleet management, real estate management, related services, consultancy, labor force and HR services</td><td>783</td><td>770</td><td>638</td><td>644</td><td>584</td></tr></tbody></table>	AREA	DESCRIPTION	NUMBER OF SUPPLIERS IN 2018	NUMBER OF SUPPLIERS IN 2019	NUMBER OF SUPPLIERS IN 2020	NUMBER OF SUPPLIERS IN 2021	NUMBER OF SUPPLIERS IN 2022	Network	wire and wireless network, transmission technology, backbone network	342	319	320	337	319	IT	hardware, software procurement, IT Consulting & Contracting, IT-operations and desktop-services, OSS, BSS	331	287	280	271	236	CPE & Noncore	special projects and terminals, functional area	86	130	119	69	84	Indirekt	marketing, low cost suppliers, fleet management, real estate management, related services, consultancy, labor force and HR services	783	770	638	644	584	Sustainability in the psupplier chain Supplier relations Managing changes																																																																																																															
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2-7	Employees	Diversity and Equal Opportunities (34)		<p>The company uses external workforce in all major areas of its operations. The decisions are made by the relevant directorates. Generally we rely on external workforce in special areas, rare skillsets and qualities contracting them to fill in temporary vacancies in different areas of our operations. The positions as well as the levels of expertise may vary and thus they are hard to specify.</p> <p>Number of employees of Magyar Telekom Group: 6507 persons (as of 31 December 2022. Magyar Telekom Plc.: 4908 persons, T-Systems Hungary: 728 persons, Makedonski Telekom: 871 persons</p> <p>The breakdown requested in points 2-7-b is discussed in the Diversity and Equal Opportunities chapter of the report.</p> <p>Data of fluctuation is under GRI 401: Employment 2016 401-1.</p> <div><table><thead><tr><th colspan="5">MAGYAR TELEKOM GROUP, 31. DECEMBER 2022</th><th colspan="4">MAGYAR TELEKOM GROUP, 31. DECEMBER 2022</th></tr><tr><th>Female</th><th>Male</th><th>Other*</th><th>Not Disclosed</th><th>Total</th><th>Magyar Telekom</th><th>T-Systems Hungary</th><th>Makedonski Telekom</th><th>Total</th></tr></thead><tbody><tr><td colspan="5">Number of employees</td><td colspan="4">Number of employees</td></tr><tr><td>2 386</td><td>4 121</td><td>0</td><td>(210)</td><td>6 507</td><td>4 908</td><td>728</td><td>871</td><td>6 507</td></tr><tr><td colspan="5">Number of permanent employees</td><td colspan="4">Number of permanent employees</td></tr><tr><td>2 342</td><td>4 061</td><td>0</td><td>0</td><td>6 403</td><td>4 851</td><td>715</td><td>837</td><td>6 403</td></tr><tr><td colspan="5">Number of temporary employees</td><td colspan="4">Number of temporary employees</td></tr><tr><td>44</td><td>60</td><td>0</td><td>(210)</td><td>104</td><td>57</td><td>13</td><td>34</td><td>104</td></tr><tr><td colspan="5">Number of non-guaranteed hours employees</td><td colspan="4">Number of non-guaranteed hours employees</td></tr><tr><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr><tr><td colspan="5">Number of full-time employees</td><td colspan="4">Number of full-time employees</td></tr><tr><td>2 288</td><td>4 081</td><td>0</td><td>0</td><td>6 369</td><td>4798</td><td>700</td><td>871</td><td>6 369</td></tr><tr><td colspan="5">Number of part-time employees</td><td colspan="4">Number of part-time employees</td></tr><tr><td>98</td><td>40</td><td>0</td><td>(210)</td><td>138</td><td>110</td><td>28</td><td>0</td><td>138</td></tr><tr><td colspan="5">Number of telework employees</td><td colspan="4">Number of telework employees</td></tr><tr><td>1 698</td><td>2 368</td><td>0</td><td>0</td><td>4 066</td><td>3 400</td><td>666</td><td>0</td><td>4 066</td></tr></tbody></table></div> <p>* Gender as specified by the employees themselves.</p>	MAGYAR TELEKOM GROUP, 31. DECEMBER 2022					MAGYAR TELEKOM GROUP, 31. DECEMBER 2022				Female	Male	Other*	Not Disclosed	Total	Magyar Telekom	T-Systems Hungary	Makedonski Telekom	Total	Number of employees					Number of employees				2 386	4 121	0	(210)	6 507	4 908	728	871	6 507	Number of permanent employees					Number of permanent employees				2 342	4 061	0	0	6 403	4 851	715	837	6 403	Number of temporary employees					Number of temporary employees				44	60	0	(210)	104	57	13	34	104	Number of non-guaranteed hours employees					Number of non-guaranteed hours employees				0	0	0	0	0	0	0	0	0	Number of full-time employees					Number of full-time employees				2 288	4 081	0	0	6 369	4798	700	871	6 369	Number of part-time employees					Number of part-time employees				98	40	0	(210)	138	110	28	0	138	Number of telework employees					Number of telework employees				1 698	2 368	0	0	4 066	3 400	666	0	4 066	Talent management Initiatives to eliminate the digital divide	8 DECENT WORK AND ECONOMIC GROWTH	10 REDUCED INEQUALITIES
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2-8	Workers who are not employees	Digitalization (24) Diversity and Equal Opportunities (36) Stakeholders - Future generation (49)	<a href="https://www.telekom.hu/lakossagi/ugyintezes/elerheto-segek/uzleteink/mobiltudos">https://www.telekom.hu/lakossagi/ugyintezes/elerheto-segek/uzleteink/mobiltudos</a> (only in Hungarian)  <a href="https://www.telekom.hu/rolunk/karrier/kickstart">https://www.telekom.hu/rolunk/karrier/kickstart</a> (only in Hungarian)	<p>On December 31, 2021 Magyar Telekom had 156 interns (including 33 Mobiltudós trainees) and T-Systems had 54 interns. Throughout our internship program these 210 interns were provided with opportunities to gain real workforce experience in various areas of our operations. The diverse team of our Y2022 interns included students from the fields of IT, business, economy, architecture, horticultural sciences and many other areas. Admission to the internship program of the company is not limited to any scholarly areas, we are eager to find out more about the applicants main drives and personality as well. We believe that thinking together with a diverse set of great people can lead to great solutions.</p> <p>Nearly 80% of the second cohort of the Kickstart career programme, 17 people, continued in full-time entry-level positions at Magyar Telekom. The third cohort of the programme continued to grow, with T-Systems joining the initiative, and 27 people started the programme in September 2022. During the one-year programme, the trainees were offered professional and soft-skills training and design thinking training. Kickstart trainees, working in areas across the company, work on a joint six-month project assignment in an agile approach, reinforcing the ability to work in cross-functional teams, which is increasingly important today. The joint project assignment is based on a real business need, reinforcing the relevance of the programme as MT evolves.</p>	Talent management Initiatives to eliminate the digital divide	8 DECENT WORK AND ECONOMIC GROWTH	10 REDUCED INEQUALITIES																																																																																																																																																



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3. Governance							
2–9 (1)	Governance structure and composition	Corporate Governance (6)	<a href="http://www.telekom.hu/about_us/investor_relations/corporate_governance">http://www.telekom.hu/about_us/investor_relations/corporate_governance</a> <a href="http://www.telekom.hu/about_us/investor_relations/corporate_governance/board_of_directors">http://www.telekom.hu/about_us/investor_relations/corporate_governance/board_of_directors</a> <a href="http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation">http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation</a> <a href="https://www.telekom.hu/about_us/investor_relations/corporate_governance/supervisory_board">https://www.telekom.hu/about_us/investor_relations/corporate_governance/supervisory_board</a> <a href="https://www.telekom.hu/about_us/investor_relations/corporate_governance/audit_committee">https://www.telekom.hu/about_us/investor_relations/corporate_governance/audit_committee</a> <a href="https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf">https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/20220412-corporate-governance-report-2021.pdf">https://www.telekom.hu/static-tr/sw/file/20220412-corporate-governance-report-2021.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/BoD_self-assessment_eng.pdf">https://www.telekom.hu/static-tr/sw/file/BoD_self-assessment_eng.pdf</a>	<p>Magyar Telekom's Board of Directors is the management body of the Company and represents the Company with regard to third parties, in court and before other authorities. The Board of Directors exercises its rights and performs its obligations as an independent body. The Board of Directors is not an operative management body, in other words, the Board of Directors is not involved in the Company's daily business. The Board of Directors is responsible for all matters relating to the Company's management and course of business not otherwise reserved to the General Meeting or to other corporate bodies by the Articles of Association of the Company or by the law.</p> <p>The Board of Directors established the Remuneration and Nomination Committee to support the Board of Directors of the Company regarding the remuneration and certain nomination related issues of the members of the corporate bodies and the top executives of the Company in accordance with its Rules of Procedure. The reason for combining certain tasks regarding the remuneration and nomination is to make the decision-making procedure of the Board of Directors more efficient in personnel matters, and to ensure the complex handling thereof.</p> <p>The Supervisory Board (SB) oversees the management of the Company in order to protect its interests. Within the framework of this activity the Supervisory Board supervises the control, management and business activities of the Company as well as compliance of the Company's operation with the laws and the Articles of Association</p> <p>The Audit Committee is a permanent committee composed – by selection of the Company's General Meeting – of independent members of the Company's Supervisory Board. The purpose of the Audit Committee is to support the Supervisory Board (1) in supervising the financial reporting system, (2) in selecting the statutory Auditor and (3) in cooperating with the statutory Auditor. The Audit Committee operates based on its Rules of Procedure. The Audit Committee establishes its own Rules of Procedure which is approved by the Supervisory Board.</p> <p>On December 31, 2022 the Board of Directors had eight members, with two internal (executive) and six external (non-executive) members. 3 members are considered independent and 5 members are not considered independent.</p> <p>Members of the Board of Directors on December 31, 2022:</p> <ul style="list-style-type: none"><li>• Dr. Robert Hauber, Chairperson of the Board of Directors, Senior Vice President Group Controlling, Deutsche Telekom AG; Chairperson of the Board of Directors since April 2017. Other principal directorships: Member of the Board of Directors and Finance Committee (BuyIn SA/NV).</li><li>• Daria Dodonova, Chief Financial Officer, Magyar Telekom Plc.; member of the Board of Directors since April 2020.</li><li>• Gábor Fekete, consultant (independent); member of the Board of Directors since April 2020.</li><li>• Elvira Gonzalez, Senior Vice President B2B Europe, Deutsche Telekom AG; member of the Board of Directors since April 2022. Other principal directorships: Member of the Supervisory Board (T-Mobile Polska), Member of the Audit Committee (T-Mobile Polska), Member of the Supervisory Board (Hrvatski Telekom).</li><li>• Frank Odzuck, Chief Executive Officer, Zwack Unicum Plc. (independent); member of the Board of Directors since November, 2006. Other principal directorships: Member of the Board of Directors (Zwack Unicum Plc.).</li><li>• Péter Ratatics, Consumer Services Executive Vice President of MOL Group (independent); member of the Board of Directors since April 2019. Other principal directorships: Member of the Management Committee (MOL Nyrt.), President (Management Board of INA d.d.), Chairman of the Supervisory Board (TIFON d.o.o.), Chairman (Hungarian Petroleum Association).</li><li>• Tibor Rékasi, Chief Executive Officer, Magyar Telekom Plc.; member of the Board of Directors since June 2018. Other principal directorships: Chairperson of the Board of Directors (T-Systems Magyarország Zrt.).</li><li>• Melinda Szabó, Senior Vice President B2C Europe, Deutsche Telekom AG, member of the Board of Directors since April 2022. Other principal directorships: Member of the Advisory Board (UNICEF), Member of the Board of Directors (Hellenic Telecommunications Organization S.A. (OTE)).</li></ul> <p>The following aspects were considered in assessing the Board of Directors members:</p> <ul style="list-style-type: none"><li>- Dr. Robert Hauber: Master and doctoral degree in business administration. Over 20 years of experience as a senior finance executive. Chairperson of the Board of Directors.</li><li>- Daria Dodonova: Master degree in International Finance. Over 15 years of experience in various management positions. Chief Financial Officer of the Company.</li><li>- Gábor Fekete: Holds a Mechanical Engineer degree. Thorough his career, he has gained experience in several managerial positions. Independent member of the Board of the Directors.</li><li>- Elvira Gonzalez: University degree in Telecommunication Engineering and Business Administration. Over 15 years of experience in telecommunications in various management positions.</li><li>- Frank Odzuck: Degree in economics. Many years of professional experience in the position of managing director of the Hungarian subsidiaries of international corporations. Independent member of the Board of Directors.</li><li>- Péter Ratatics: Graduated in economics. Over 10 years of management experience in various positions. Independent member of the Board of Directors.</li><li>- Tibor Rékasi: Graduated from the Budapest Foreign Trade College. Over 20 years of experience in various managerial positions. Directed Magyar Telekom's Enterprise (T-Systems Magyarország Zrt.) and Residential businesses as a Chief Officer. Chief Executive Officer of the Company.</li><li>- Melinda Szabó: Holds a degree in Marketing Economics and Business Administration. Over 15 years of experience in the telecommunications industry in various management positions.</li></ul>	Regulatory compliance Risk management Environmental targets, costs and compliance		 

<sup>1</sup> Due to the situation caused by the coronavirus epidemic (Covid-19) the Annual General Meeting was not held on its scheduled date. Based on Section 9 (2) of Government Decree no. 102/2020. (IV. 10.) the Board of Directors of the Company decided in the matters set on the published agenda of the Annual General Meeting.


<sup>2</sup> Due to the situation caused by the coronavirus epidemic (Covid-19) the Annual General Meeting was not held on its scheduled date. Based on Section 9 (2) of Government Decree no. 102/2020. (IV. 10.) the Board of Directors of the Company decided in the matters set on the published agenda of the Annual General Meeting.

<sup>3</sup> Due to the situation caused by the coronavirus epidemic (Covid-19) the Annual General Meeting was not held on its scheduled date. Based on Section 9 (2) of Government Decree no. 102/2020. (IV. 10.) the Board of Directors of the Company decided in the matters set on the published agenda of the Annual General Meeting.





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2–9 (2)	Governance structure and composition	Corporate Governance (6)	<a href="http://www.telekom.hu/about_us/investor_relations/corporate_governance">http://www.telekom.hu/about_us/investor_relations/corporate_governance</a> <a href="http://www.telekom.hu/about_us/investor_relations/corporate_governance/board_of_directors">http://www.telekom.hu/about_us/investor_relations/corporate_governance/board_of_directors</a> <a href="http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation">http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation</a> <a href="https://www.telekom.hu/about_us/investor_relations/corporate_governance/supervisory_board">https://www.telekom.hu/about_us/investor_relations/corporate_governance/supervisory_board</a> <a href="https://www.telekom.hu/about_us/investor_relations/corporate_governance/audit_committee">https://www.telekom.hu/about_us/investor_relations/corporate_governance/audit_committee</a> <a href="https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf">https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/20220412-corporate-governance-report-2021.pdf">https://www.telekom.hu/static-tr/sw/file/20220412-corporate-governance-report-2021.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/BoD_self-assessment_eng.pdf">https://www.telekom.hu/static-tr/sw/file/BoD_self-assessment_eng.pdf</a>	<p>The Civil Code does not include requirements with regard to the independence of the members of the Board if besides the Board there is also a Supervisory Board operating at the company.</p> <p>According to the Articles of Association the Supervisory Board shall be comprised of 5 members.The gender ratio in the Supervisory Board on December 31, 2022: 4 males and 1 female. Members of the Supervisory Board on December 31, 2022:</p> <ul style="list-style-type: none"><li>• Prof. dr. Attila Borbély, Chairperson of the Supervisory Board, Professor Emeritus of University of Debrecen, Faculty of Economics and Business (independent); chairperson of the Supervisory Board since April 2020.</li><li>• Krisztina Dorogházi, Senior Vice President Chief Accounting Officer and Controller, TechnipFMC, (independent); member of the Supervisory Board since April 2020.</li><li>• Gyula Bereznai, Chairman of the Central Workers' Council, Magyar Telekom Plc.; member of the Supervisory Board since April 2022.</li><li>• András Szakonyi, Senior Vice President - Global Data Centers, Iron Mountain, (independent); member of the Supervisory Board since April 2020.</li><li>• Endre Szepesi, Member of the Workers Council, Magyar Telekom Plc.; member of the Supervisory Board since April 2022.</li></ul> <p>The General Meeting elects a 3-member Audit Committee from the independent members of the Supervisory Board for the same period as the membership of the relevant members in the Supervisory Board. The gender ratio in the Audit Committee on December 31, 2022: 2 males and 1 female. Members of the Audit Committee on December 31, 2022:</p> <ul style="list-style-type: none"><li>• Prof. dr. Attila Borbély, Chairperson of the Audit Committee, Professor Emeritus of University of Debrecen, Faculty of Economics and Business; Chairperson of the Audit Committee since April 2020</li><li>• Krisztina Dorogházi, Senior Vice President Chief Accounting Officer and Controller, TechnipFMC; member of the Audit Committee since April 2020</li><li>• András Szakonyi, Senior Vice President - Global Data Centers, Iron Mountain; member of the Audit Committee since April 2020.</li></ul> <p>On December 31, 2022 the Remuneration and Nomination Committee had three members (three external (non-executive) members). 1 member is considered independent and 2 members are not considered independent. The gender ratio in the Remuneration and Nomination Committee on December 31, 2022: 2 males and 1 female. Members of the Remuneration and Nomination Committee on December 31, 2022:</p> <ul style="list-style-type: none"><li>• Dr. Robert Hauber, Chairperson of the Remuneration and Nomination Committee, Senior Vice President Group Controlling, Deutsche Telekom AG; Chairperson of the Remuneration and Nomination Committee since April 2017. Other principal directorships: Member of the Board of Directors and Finance Committee (BuyIn SA/NV)</li><li>• Elvira Gonzalez, Senior Vice President B2B Europe, Deutsche Telekom AG; member of the Remuneration and Nomination Committee since May 2022. Other principal directorships: Member of the Supervisory Board (T-Mobile Polska), Member of the Audit Committee (T-Mobile Polska), Member of the Supervisory Board (Hrvatski Telekom).</li><li>• Frank Odzuck, Chief Executive Officer, Zwack Unicum Plc.; member of the Remuneration and Nomination Committee since April 2010. Other principal directorships: Member of the Board of Directors (Zwack Unicum Plc.).</li></ul>	Regulatory compliance Risk management Environmental targets, costs and compliance		 
2–10	Nomination and selection of the highest governance body		<a href="http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation">http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation</a> <a href="http://www.telekom.hu/about_us/investor_relations/corporate_governance/corporate_governance_documents">http://www.telekom.hu/about_us/investor_relations/corporate_governance/corporate_governance_documents</a> <a href="https://www.telekom.hu/static-tr/sw/file/AGM_submissions_18March2019_eng.pdf">https://www.telekom.hu/static-tr/sw/file/AGM_submissions_18March2019_eng.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/20220412_AGM_resolutions_honlapra.pdf">https://www.telekom.hu/static-tr/sw/file/20220412_AGM_resolutions_honlapra.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/2022AGM_submissions_0321_boritoval.pdf">https://www.telekom.hu/static-tr/sw/file/2022AGM_submissions_0321_boritoval.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/20200424_BoD_resolutions_eng_final.pdf">https://www.telekom.hu/static-tr/sw/file/20200424_BoD_resolutions_eng_final.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/20230201_Alapszabaly_ENG_honlapra.pdf">https://www.telekom.hu/static-tr/sw/file/20230201_Alapszabaly_ENG_honlapra.pdf</a>	<p>The Annual General Meeting held on April 12, 2022 elected the new Board of Directors members.</p> <p>Shareholders shall have the right to participate at the General Meeting, and if holding shares with voting rights, to vote, in accordance with the Articles of Association.</p> <p>In December 2013 the Remuneration and Nomination Committee elaborated the standard requirements for nomination of the members of the corporate bodies which – among others – include information relating to the identity and professional suitability of the candidates, and their relevant professional and industrial experience. The Remuneration and Nomination Committee on its meeting held on April, 2016 agreed that in the nomination process diversity and complementary competencies are taken into consideration.</p> <p>Remuneration and Nomination Committee <a href="http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation">http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation</a> <a href="https://www.telekom.hu/static-tr/sw/file/20200101_MT_RNC_RoP_ENG.pdf">https://www.telekom.hu/static-tr/sw/file/20200101_MT_RNC_RoP_ENG.pdf</a></p> <p>Submissions of the Annaul General Meeting 2022 <a href="https://www.telekom.hu/static-tr/sw/file/2022AGM_submissions_0321_boritoval.pdf">https://www.telekom.hu/static-tr/sw/file/2022AGM_submissions_0321_boritoval.pdf</a></p> <p>Resolutions of the Annual General Meeting 2022 <a href="https://www.telekom.hu/static-tr/sw/file/20220412_AGM_resolutions_honlapra.pdf">https://www.telekom.hu/static-tr/sw/file/20220412_AGM_resolutions_honlapra.pdf</a></p> <p>Articles of Association <a href="https://www.telekom.hu/static-tr/sw/file/20230201_Alapszabaly_ENG_honlapra.pdf">https://www.telekom.hu/static-tr/sw/file/20230201_Alapszabaly_ENG_honlapra.pdf</a></p>	Corporate compliance Regulatory compliance		 
2–11	Chair of the highest governance body		<a href="https://www.telekom.hu/about_us/investor_relations/corporate_governance/board_of_directors">https://www.telekom.hu/about_us/investor_relations/corporate_governance/board_of_directors</a> <a href="https://www.telekom.hu/static-tr/sw/file/BoD_self-assessment_eng.pdf">https://www.telekom.hu/static-tr/sw/file/BoD_self-assessment_eng.pdf</a>	The chairperson of the Board of Directors is an external (non-executive) member of the Board of Directors.	Corporate compliance Regulatory compliance		

DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERI-ALITY TOPICS	SASB CODE	SDG TARGET
2-12	Role of the highest govern-ance body in overseeing the management of impacts	Corporate Governance (6) Stakeholders (40)		<p>Risk items affecting our operations are reviewed regularly throughout the Company. All of our subsidiaries and entities are obliged to identify and report their operational risks. After evaluation of these risks, results are reported to the Company's management, to the Board of Directors, to the Audit Committee and the Supervisory Board. This regular reporting ensures that the most significant risks are monitored, up-to-date risk mitigation measures are implemented and regularly monitored.</p> <p>Our risk reporting system is complemented by a continuous reporting procedure, which requires all of our departments and subsidiaries to report on a real-time basis any new material fact, information or risk that comes to their knowledge. Information thus submitted is monitored and evaluated by the risk management area and the Chief Financial Officer notified when a new material risk or information is identified. An internal regulation has been issued to define responsibilities of each employee in risk monitoring and management.</p> <p>The risk assessment is carried out for a two-year period. This is also our forecast period. If there are significant risks beyond the forecast period, such risks are monitored on a continuous basis.</p>	Involvement of our customers Our employees as corporate citizens Risk management Corporate compliance		
2-13	Delegation of responsi-bility for managing impacts	Corporate Governance (6)			Corporate compliance		
2-14	Role of the highest govern-ance body in sustainabi-lity reporting	Corporate Governance (6)			Corporate governance		
2-15	Conflicts of interest		<p><a href="https://www.telekom.hu/about_us/investor_relations/corporate_governance/board_of_directors">https://www.telekom.hu/about_us/investor_relations/corporate_governance/board_of_directors</a></p> <p><a href="https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf">https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf</a></p>	<p>According to the Corporate Governance Recommendations of the Budapest Stock Exchange, the Board of Directors prepared and acknowledged its report on cases in which "significan</p> <p>nterest" of the members of the Board of Directors or their relatives could be clearly identified in any business transactions of the Com-pany, which excluded their independence. The Board of Directors submitted the report to the Supervisory Board for acknowledges.</p> <p>Transactions between members of the Board of Directors (or persons in a close relationship to them) and the Company (or the Com-pany's subsidiaries) shall be conducted according to the general rules of practice of the Company, but, with stricter transparency rules in place. In the case such a transaction is outside the normal course of the Company's business, the transaction and its terms should be approved by the Supervisory Board.</p> <p>In the event of accepting a new executive office, within fifteen days of accepting such executive office, the member of the Board of Di-rectors shall notify about this fact in writing those companies, where he/she already serves as an executive officer or a supervisory board member. The member of the Board of Directors shall inform the Supervisory Board, if he/she receives an offer of Board of Directors or Supervisory Board membership or an offer of an executive management position in a company which is not part of the Company group and also if he/she accepted the offer.</p>	Regulatory compliance		
2-16	Communication of critical concerns	Corporate Governance (6) Stakeholders (40)		2-16-b Confidentiality constraints			
2-17	Collective knowledge of the highest governance body	Corporate Governance (6)		In the process of creating a sustainability strategy, and in the time between strategies, both senior management and the Sustainability Squad will increase their knowledge of sustainable development and corporate governance. As part of this, they regularly attend training on risk management and compliance issues, learn about international sustainability trends, responsible investor assessments, and cur-rent new regulations. In addition, the company pays particular attention to data security and the creation of a diverse and inclusive work environment, and diversity and data protection training is mandatory for all employees.			
2-18	Evaluation of the per-formance of the highest governance body			Top management decisions have a direct impact on the entire Magyar Telekom Group's activity and future priorities. The performance of the top management (Chief Executive Officer, Chief Officers) is incentivized through the Lead to Win motivation system. The incentive system has a short-term incentive (bonus), a long-term, cash-based incentive (LTI) and a long-term, share-based incentive (share benefit program - SBP) element. The Remuneration and Nomination Committee of Magyar Telekom Group's Board of Directors makes proposals both for the annual targets and the evaluation of their implementation. The Committee Member, independent from the majority owner, shall provide for the representation of the minority owners' interests. Upon consideration of the proposals made by the Remuneration Committee, the Board of Directors adopts decisions regarding the targets and evaluation of top executives' performance. The Board of Directors evaluates the performance of the previous year and finalizes the targets of the current year in the first meeting of the year. In general, 55% of top executives' salary is fixed, while 45% is variable pay (bonus). The annual bonus is payable prorated to the evaluated performance of the partly collective, partly individual targets set at the beginning of the year and derived from Magyar Telekom Group's strategic targets. In the case of the collective targets no bonus is payable, if performance is below a certain minimum limit, defined in advance. In case of over-achieving the targets, additional bonus is paid, the extent of which cannot exceed 50% of the bonus payable upon 100% performance. The framework of bonus target setting (bonus amount, structure and maximal amount of additional bonus) is defined by the strategic investor's compensation guidelines (Deutsche Telekom Global Compensation Guidelines). In addition to the annual target-setting, evaluation and bonus payment used as short term incentive, the Company also lays emphasis on long-term performance stimulation. The first package of the LTI-program - as part of the Lead to Win system - was introduced in 2015 so as to stimulate the contribution of the top management to the achievement of the strategic objectives even more effectively. With the 4 year term Telekom focuses on the increase of sustainable performance. It is the competence of the General Meeting to approve the "Remune-ration Guidelines" that sets forth the remuneration principles and components for the top management and the members of corporate bodies. Besides, as part of the Corporate Governance Report, Telekom each year discloses the previous year's remuneration for the top management and corporate bodies in the Remuneration Statement. The conditions of selecting the members of Magyar Telekom's Board of Directors, Supervisory Board and Audit Committee were amended by the Remuneration and Nomination Committee in April 2016: as new elements diversity and the reciprocal supplementation of competences are also taken into account.	Corporate compliance		



DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERI-ALITY TOPICS	SASB CODE	SDG TARGET
2–19	Remuneration policies	Diversity and Equal opportunity (33)	<a href="http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation">http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation</a> <a href="https://www.telekom.hu/static-tr/sw/file/IFRS_Group_2018_AGM_alairt_nyilatkozattal.pdf">https://www.telekom.hu/static-tr/sw/file/IFRS_Group_2018_AGM_alairt_nyilatkozattal.pdf</a> <a href="https://www.telekom.hu/about_us/investor_relations/corporate_governance/corporate_governance_documents">https://www.telekom.hu/about_us/investor_relations/corporate_governance/corporate_governance_documents</a> <a href="https://www.telekom.hu/static-tr/sw/file/2022AGM_submissions_0321_boritoval.pdf">https://www.telekom.hu/static-tr/sw/file/2022AGM_submissions_0321_boritoval.pdf</a>	<p>Top management decisions have a direct impact on the entire Magyar Telekom Group's activity and future priorities. The performance of the top management (Chief Executive Officer, Chief Officers) is incentivized through the Lead to Win motivation system. The incentive system has a short-term incentive (bonus), a long-term, cash-based incentive (LTI) and a long-term, based incentive (share benefit program - SBP) element. The Remuneration and Nomination Committee of Magyar Telekom Group's Board of Directors makes proposals both for the annual targets and the evaluation of their implementation. The Committee Member, independent from the majority owner, shall provide for the representation of the minority owners' interests. Upon consideration of the proposals made by the Remuneration Committee, the Board of Directors adopts decisions regarding the targets and evaluation of top executives' performance. The Board of Directors evaluates the performance of the previous year and finalizes the targets of the current year in the first meeting of the year. In general, 55% of top executives' salary is fixed, while 45% is variable pay (bonus). The annual bonus is payable prorated to the evaluated performance of the partly collective, partly individual targets set at the beginning of the year and derived from Magyar Telekom Group's strategic targets. In the case of the collective targets no bonus is payable, if performance is below a certain minimum limit, defined in advance. In case of over-achieving the targets, additional bonus is paid, the extent of which cannot exceed 50% of the bonus payable upon 100% performance. The framework of bonus target setting (bonus amount, structure and maximal amount of additional bonus) is defined by the strategic investor's compensation guidelines (Deutsche Telekom Global Compensation Guidelines). In addition to the annual target-setting, evaluation and bonus payment used as short term incentive, the Company also lays emphasis on long-term performance stimulation. The first package of the LTI-program - as part of the Lead to Win system - was introduced in 2015 so as to stimulate the contribution of the top management to the achievement of the strategic objectives even more effectively. With the 4 year term Telekom focuses on the increase of sustainable performance. It is the competence of the General Meeting to approve the "Remuneration Guidelines" that sets forth the remuneration principles and components for the top management and the members of corporate bodies. Besides, as part of the Corporate Governance Report, Telekom each year discloses the previous year's remuneration for the top management and corporate bodies in the Remuneration Statement. The conditions of selecting the members of Magyar Telekom's Board of Directors, Supervisory Board and Audit Committee were amended by the Remuneration and Nomination Committee in April 2016: as new elements diversity and the reciprocal supplementation of competences are also taken into account.</p> <p>In 2022, Magyar Telekom published its annual (2021) Remuneration Report, in which it publicly disclosed the remuneration of the CEO and the Deputy CEOs.</p>	Corporate compliance		
2–20	Process to determine remuneration		<a href="https://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation">https://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation</a> <a href="https://www.telekom.hu/static-tr/sw/file/20220412-remuneration-policy.pdf">https://www.telekom.hu/static-tr/sw/file/20220412-remuneration-policy.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/20200101_MT_RNC_RoP_ENG.pdf">https://www.telekom.hu/static-tr/sw/file/20200101_MT_RNC_RoP_ENG.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/2022AGM_submissions_0321_boritoval.pdf">https://www.telekom.hu/static-tr/sw/file/2022AGM_submissions_0321_boritoval.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/20220412_AGM_resolutions_honlapra.pdf">https://www.telekom.hu/static-tr/sw/file/20220412_AGM_resolutions_honlapra.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/AGM_submission_-_April_16_2020_final.pdf">https://www.telekom.hu/static-tr/sw/file/AGM_submission_-_April_16_2020_final.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/20200424_BoD_resolutions_eng_final.pdf">https://www.telekom.hu/static-tr/sw/file/20200424_BoD_resolutions_eng_final.pdf</a>	<p>The task of the Remuneration and Nomination Committee of Magyar Telekom Nyrt. is to make a proposal to the General Meeting on the compensation of the members of the Board of Directors, the Supervisory Board and the Audit Committee</p> <p>The Remuneration and Nomination Committee of Magyar Telekom Nyrt. has prepared the Remuneration Policy of Magyar Telekom Nyrt. and with the agreement of the Board of Directors, submitted it to the General Meeting for an advisory vote. The Annual General Meeting held on April 12, 2022 approved the amended Remuneration Policy of Magyar Telekom Nyrt. pursuant to Act LXVII</p> <p>of 2019 (SRD Act). The remuneration and evaluation of the work performed by members of the Board of Directors, the Supervisory Board, and the Chief Executive Officer and other Chief Officers of Magyar Telekom Plc. focusing on the Company's continuous development and growth are conducted along the Remuneration Policy adopted by the Company's General Meeting.</p> <p>The relative value and composition of the components included in the Remuneration Policy are determined on the basis of market benchmarks, which is an identical methodology to the one applied in determining the compensation system for the employees in general.</p> <p>The Annual General Meeting held on April 12, 2022 determined the remuneration of the members of the Board of Directors.</p> <p>On April 24, 2020 the Board of Directors determined the remuneration of the members of the Supervisory Board and the Audit Committee. [1]</p> <p>Shareholders shall have the right to participate at the General Meeting, and if holding shares with voting rights, to vote, in accordance with the Articles of Association.</p> <p>[1] Due to the situation caused by the coronavirus epidemic (Covid-19) the Annual General Meeting was not held on its scheduled date. Based on Section 9 (2) of Government Decree no. 102/2020. (IV. 10.) the Board of Directors of the Company decided in the matters set on the published agenda of the Annual General Meeting.</p>	Corporate compliance		
2–21	Annual total compensation ratio		<a href="https://www.telekom.hu/static-tr/sw/file/2020AGM-Remuneration-Policy.pdf">https://www.telekom.hu/static-tr/sw/file/2020AGM-Remuneration-Policy.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/20220412-corporate-governance-report-2021.pdf">https://www.telekom.hu/static-tr/sw/file/20220412-corporate-governance-report-2021.pdf</a>	Confidentiality constraints	Corporate compliance Investor relations		
4. Strategy, policies and practices							
2–22	Statement on sustainable development strategy	CEO Letter (3) Our Approach - Sustainability Strategy (5)	<a href="https://www.telekom.hu/sustainability">https://www.telekom.hu/sustainability</a> <a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy">https://www.telekom.hu/about_us/sustainability/sustainability-strategy</a> <a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy/what-does-sustainability-mean-for-us">https://www.telekom.hu/about_us/sustainability/sustainability-strategy/what-does-sustainability-mean-for-us</a> <a href="https://www.telekom.hu/about_us/sustainability/digitally-enabled-sustainability/vision">https://www.telekom.hu/about_us/sustainability/digitally-enabled-sustainability/vision</a> <a href="https://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf">https://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf</a>	<p>In 2021, the Magyar Telekom Group has defined a new 10-year sustainability strategy (2021–2025–2030), with 3 main strategic focus areas: Climate protection, Digitalization and Diversity.</p> <p>The main objective of the new sustainability strategy is to ensure that Magyar Telekom remains the country's leading sustainable company by being a catalyst of growth for people, families, communities and businesses, and an accelerator of environment protection.</p>	Corporate governance		
2–23	Policy commitments	Our Approach - Sustainability Strategy (5) Climate and Environment Protection (9) Stakeholders - Suppliers (43)	<a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy">https://www.telekom.hu/about_us/sustainability/sustainability-strategy</a> <a href="https://www.telekom.com/resource/blob/525950/75e-73159e5Saec7fd50199ffb9878ad7/dl-180528-umwelt-schutz-en-data.pdf">https://www.telekom.com/resource/blob/525950/75e-73159e5Saec7fd50199ffb9878ad7/dl-180528-umwelt-schutz-en-data.pdf</a>	Magyar Telekom complies with the legal requirements in all geographies it operates in. Beyond legal requirements, Magyar Telekom employs a precautionary principle in existing and new ventures. We intend to prevent or alternatively minimize negative environmental impacts related to existing and new projects, products and services. Environmental Risk Assessments are an integral part of our due-diligence processes for mergers and acquisitions.	Regulatory compliance Risk management Environmental targets, costs and compliance		









DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERIALITY TOPICS	SASB CODE	SDG TARGET
2-24	Embedding policy commitments	Our Approach (5) Diversity and Equal opportunity (30) Stakeholders (40)	<a href="https://www.telekom.hu/static-tr/sw/file/emberi-jogok-es-szocialis-alapelvek-kodexe.pdf">https://www.telekom.hu/static-tr/sw/file/emberi-jogok-es-szocialis-alapelvek-kodexe.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/mt-mukodesi-kodex.pdf">https://www.telekom.hu/static-tr/sw/file/mt-mukodesi-kodex.pdf</a> <a href="http://www.telekom.hu/rolunk/vallalatrol/iranyelveink/megfeleloseg/a-megfelelosegi-program">http://www.telekom.hu/rolunk/vallalatrol/iranyelveink/megfeleloseg/a-megfelelosegi-program</a> <a href="http://www.telekom.hu/static-tr/sw/file/Code_of_Ethics.pdf">http://www.telekom.hu/static-tr/sw/file/Code_of_Ethics.pdf</a>	The Magyar Telekom Group's Code of Conduct summarises the Group's corporate compliance requirements, sets out the Group's shared values and is also the pledge of Telekom's strong position, reputation and successful future. The Code of Conduct applies to everyone within the Magyar Telekom Group, from employees to members of the Board of Directors. Furthermore, Magyar Telekom Group's contractual partners must also acknowledge and accept these values when registering on the procurement website.	Corporate compliance Corporate governance Regulatory compliance		
2-25	Processes to remediate negative impacts	Our Approach (5) Climate and Environment Protection (9) Diversity and Equal opportunity (30) Stakeholders (40)					
2-26	Mechanisms for seeking advice and raising concerns		<a href="http://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance">http://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance</a>	Magyar Telekom Group takes the Code of Conduct and its detailed regulation seriously and considers its enforcement to be among the highest priorities, but it is also acknowledged that it is sometimes difficult to know right from wrong. That's why the employees are encouraged to initiate open communication through an internally available Ask me! portal. Complaints and concerns about possible non-compliance with ethics are to be issued through the dedicated Tell Me! secure internal employee site.	Corporate compliance Human rights, equal opportunities		
2-27	Compliance with laws and regulations			Magyar Telekom uses its best efforts to fulfill its obligations in accordance with the effective laws. In order to prevent potential authority penalties and sanctions the Company always strives to ensure Magyar Telekom's compliance with the effective laws and manage conflicts – besides harmonizing processes and IT systems with the amendment of laws - with continuous personal consultation, agreements concluded with the authorities and retroactive settlement plans set out in undertakings, made in the form of declarations.  Magyar Telekom reports for the GVH and NMHH fines in the related GRI indicators. Further information is confidential.			
2-28	Membership associations	Stakeholders (40)			Professional cooperation		
5. Stakeholder engagement							
2-29	Approach to stakeholder engagement	Stakeholders (40)		100% of the employment contracts of Magyar Telekom Group employees operating in Hungary fall under collective bargaining agreements, the same ratio for Macedonian workers is 82.62%.			
2-30	Collective bargaining agreements			99.9% of the employment contracts of Magyar Telekom Plc. employees operating in Hungary fall under collective bargaining agreements (the CEO and Deputies are excluded from the scope of the Collective Agreement). 100% of the employment contracts of T-Systems Hungary employees operating in Hungary fall under collective bargaining agreements, the same ratio for Macedonian workers is 82.62% in 2022.	Human rights, equal opportunities		





















DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERI-ALITY TOPICS	SASB CODE	SDG TARGET																																				
201-4	Financial assistance received from government			<div>Substantial financial support from State</div> <table><tr><th></th><th>2018</th><th>2019</th><th>2020</th><th>2021</th><th>2022</th></tr><tr><td>tax credit utilization</td><td>2 484 HUF million</td><td>3 862 HUF million</td><td>3 141 HUF million</td><td>4 267 HUF million</td><td>3 237 HUF million</td></tr><tr><td>film- and sport subsidies</td><td>500 HUF million</td><td>645 HUF million</td><td>719 milli6</td><td>1 504 HUF million</td><td>775<sup>s</sup> HUF million</td></tr><tr><td>tax benefit on wage cost of software developers</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr><tr><td>tax impact of tax base decreasing item on donations</td><td>0</td><td>559 HUF thousand</td><td>306 HUF thousand</td><td>950 HUF thousand</td><td>360 HUF thousand</td></tr><tr><td>tax impact of tax base decreasing item on R&amp;D</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr></table>		2018	2019	2020	2021	2022	tax credit utilization	2 484 HUF million	3 862 HUF million	3 141 HUF million	4 267 HUF million	3 237 HUF million	film- and sport subsidies	500 HUF million	645 HUF million	719 milli6	1 504 HUF million	775 <sup>s</sup> HUF million	tax benefit on wage cost of software developers	0	0	0	0	0	tax impact of tax base decreasing item on donations	0	559 HUF thousand	306 HUF thousand	950 HUF thousand	360 HUF thousand	tax impact of tax base decreasing item on R&D	0	0	0	0	0			
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tax impact of tax base decreasing item on R&D	0	0	0	0	0																																						
GRI 202: Market Presence 2016																																											
103-1-2-3	Management approach	Our Approach (5) Diversity and Equal opportunities (30) Stakeholders (40)																																									
202-1	Ratios of standard entry level wage by gender compared to local minimum wage			Magyar Telekom Group always provides at least the minimum wage as required in the relevant legislation and the salary of new entrants is exclusively determined by the value of the advertised position. Magyar Telekom is an equal opportunity employer. The salary brackets are determined on the basis of the actual market benchmark regardless of the gender of the employees.	Human rights, equal opportunities Corporate compliance Regulatory compliance																																						
202-2	Proportion of senior management hired from the local community	Diversity and Equal opportunities (30)			Human rights, equal opportunities Corporate compliance																																						
GRI 203: Indirect Economic Impacts 2016																																											
103 1-2-3-	Management Approach	Our Approach - Sustainability Strategy (5)																																									
203-1	Infrastructure investments and services supported	Digitalization (21) Stakeholders (40)			Service availability																																						
203-2	Significant indirect economic impacts	Digitalization (21) Stakeholders (40)																																									
GRI 204: Procurement Practices 2016																																											
103 1-2-3	Management Approach		<a href="https://beszerzes.telekom.hu/beszerzes/portal_en?appid=beszerzes&amp;page=english/main.vm">https://beszerzes.telekom.hu/beszerzes/portal_en?appid=beszerzes&amp;page=english/main.vm</a>																																								
204-1	Proportion of spending on local suppliers				Local procurement																																						
GRI 205: Anti-corruption 2016																																											
103 1-2-3	Management Approach		<a href="http://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance">http://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance</a> <a href="https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf">https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf</a> <a href="http://www.telekom.hu/static-tr/sw/file/Anti_corruption_clause_en.pdf">http://www.telekom.hu/static-tr/sw/file/Anti_corruption_clause_en.pdf</a> <a href="http://www.telekom.hu/static-tr/sw/file/corporate_governance_declarations_ICS_eng.pdf">http://www.telekom.hu/static-tr/sw/file/corporate_governance_declarations_ICS_eng.pdf</a>	<p>Magyar Telekom does not tolerate intention or transaction on corruption; therefore several internal policies and procedures have been developed to prohibit and prevent bribery (including making facilitation payments). Magyar Telekom intention is to comply with the anti-corruption rules relevant to the Group and it expects its business partners that they will not use money or other consideration paid by Magyar Telekom Group for unlawful purposes, including purposes violating anti-corruption laws, such as make or cause to be made direct or indirect payments to any public official or private person in order to assist Magyar Telekom or anyone acting on its behalf in obtaining or retaining business with, or directing business to, any person, or securing any improper advantage. Telekom prohibits any form of corruption or bribery including but not limited to providing or accepting or promising personal advantage, kick-backs or facilitation payments.</p> <p>The Group also prohibits its employees to make decisions for the employees' benefit or that of the employees' family, friends, associates and acquaintances. No gift or invitation to events can be granted to a third-party where they could affect or be perceived to affect the outcome of a business transaction. The Magyar Telekom Group does not financially or morally support political parties, political organizations or their representatives. Its charitable contribution activities are disclosed on its internet site . Magyar Telekom does not intent to conduct any business with third parties who violate the anticorruption regulations or the guiding principles of the Compliance Program.</p>																																							
205-1	Operations assessed for risks related to corruption		<a href="https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance">https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance</a>	Our yearly Compliance Risk Assessment (CRA) addresses active and passive corruption separately. It always includes Magyar Telekom, T-Systems, Makedonski Telekom. Other subsidiaries may be included on an ad-hoc basis based on inputs coming from compliance investigations. The CRA covers the before mentioned companies entirely (100%). During the risk assessment we formulate remedial actions concerning the risks identified. We also monitor the fulfillment of these measures.	Risk management Corporate compliance																																						

<sup>s</sup> The tax relief for the sports subsidy may change until 31 May, as the tax return for 2022 will only be submitted by the company on the basis of the certificates received by then.

























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205-2	Communication and training about anti-corruption policies and procedures		<a href="https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance">https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance</a>	a. number and proportion of the members of management bodies to which the organization's anticorruption policy and processes have been communicated, broken down to regions: 100%, and all regions, Magyar Telekom: 6 persons (Leadership Squad) b. number and proportion of employees to whom the organization's anticorruption policy and processes have been communicated, broken down to employee categories and regions: 100%, all regions c. number and proportion of business partners to which the organization's anticorruption policy and processes have been communicated, broken down to business partner type and region: 100%, Magyar Telekom's current business partners. The anticorruption policy is publicly available. d. number and proportion of management organizations that were trained on anticorruption, broken down to regions: 100%, all regions, Magyar Telekom: 6 persons e. number and proportion of employees who were trained on anticorruption, broken down to employee a category and region: Magyar Telekom Plc. 5112 persons, in 2022-ben 93% of new entrants completed the course successfully	Risk management Corporate compliance		
205-3	Confirmed incidents of corruption and actions taken			Number of confirmed incidents: 0	Risk management Corporate compliance		
GRI 206: Anti-competitive Behavior 2016							
103 1-2-3	Management Approach		<a href="https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance">https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance</a>	Magyar Telekom uses its best efforts to fulfill its obligations in accordance with the effective laws. Eg. in the field of electronic communications in order to prevent potential authority penalties and sanctions the Company always strive to ensure Magyar Telekom's compliance with the effective laws and manage conflicts - besides harmonizing our processes and IT systems with the amendment of laws - with the NMHH continuous personal consultation, agreements concluded with the authorities and retroactive settlement plans set out in undertakings, made in the form of declarations.	Corporate compliance Regulatory compliance		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices			The antitrust policy covers price fixing, bid rigging, market allocation schemes. The antitrust policy applies to: employees, contractors, suppliers. Measures are taken to promote and ensure antitrust compliance. In 2022 no fines were imposed due to anti-competitive conduct or violation of antitrust rules.	Corporate compliance Regulatory compliance	TC-TL-520a. 1	
GRI 207: Tax 2019							
207-1	Management Approach			"In order to ensure tax compliance, Magyar Telekom Group considers it a top priority to fulfill all tax liabilities fully and in time, as required by the relevant laws, guidelines, contracts and court rulings. Compliance with the tax laws is ensured by the fact that there is a dedicated organizational unit, the Tax Center of Expertise that is responsible for filing tax returns, managing tax implications of business transactions and liaising with tax authorities and other affected parties (e.g. the Ministry of Finance). The Tax CoE is a part of the Reporting and Tax Tribe reporting to the CFO .  This underlying responsibility of the company is managed by a Group-level process, encompassing all the related tasks, accountabilities, authorizations and guidelines associated with the fulfillment of tax liabilities. The process defines how the affected parties should cooperate with the aim to fulfill Magyar Telekom's relevant liabilities."	Risk management Corporate compliance		
207-2	Tax governance, control, and risk management		<a href="https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf">https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf</a>	Magyar Telekom has a Group-level risk management system in place, which covers the efficient and appropriate management of tax-related risks, too. The system systematically identifies, analyzes, assesses, monitors and minimizes tax-related risks and ensures their proper communication. In addition, existing and regularly reviewed controls (ICS) are in place in the taxation area, which ensure that all organizational entities that need to be aware of the effective taxation statutes and their potential changes for their daily operations and that have a direct impact on the proper fulfillment of tax liabilities be up to date in that regard.	Risk management Corporate compliance		
207-3	"Stakeholder engagement and management of concerns related to tax"		<a href="https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf">https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf</a>				














































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207–4	Country-by-country reporting		<a href="https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf">https://www.telekom.hu/static-tr/sw/file/IFRS_Group_ENG_20211231.pdf</a>	<div><div><div>MAGYAR TELEKOM GROUP (MILLION HUF)</div><div>Magyar Telekom Group's activities cover three basic business areas:<ul style="list-style-type: none"><li>- fixed line and mobile communications services for residential customers (Telekom brand)</li><li>- services for SMB customers (Telekom brand)</li><li>- corporate services provided to enterprise customers (previously T-Systems brand; from November 2022 Telekom brand).</li></ul></div><table><tr><td>Number of employees</td><td>6 705</td></tr><tr><td>Revenues</td><td>746 669</td></tr><tr><td>Mobile revenues</td><td>433 178</td></tr><tr><td>Fixed line revenues</td><td>237 019</td></tr><tr><td>System integration and IT revenues</td><td>76 472</td></tr><tr><td>Revenue from contracts with customers</td><td>738 827</td></tr><tr><td>Revenue from other sources</td><td>7 842</td></tr><tr><td>Operating expenses</td><td>(645 712)</td></tr><tr><td>Other operating income</td><td>8 221</td></tr><tr><td>Operating profit</td><td>109 178</td></tr><tr><td>Interest income</td><td>1588</td></tr><tr><td>Interest expense</td><td>(17 596)</td></tr><tr><td>Other finance expense-net</td><td>(8 801)</td></tr><tr><td>Net financial result</td><td>(24 809)</td></tr><tr><td>Share of associates' and joint ventures' net profit</td><td>26</td></tr><tr><td>Profit before income tax</td><td>84 395</td></tr><tr><td>Income tax</td><td>(17 321)</td></tr><tr><td>Profit for the year</td><td>67 074</td></tr><tr><td>Consolidated statements of cash flows</td><td></td></tr><tr><td>Cash flows from operating activities</td><td>195 763</td></tr><tr><td>Net cash used in investing activities</td><td>(105 256)</td></tr><tr><td>Net cash used in financing activities</td><td>(91 859)</td></tr><tr><td>Change in cash and cash equivalents</td><td>(602 )</td></tr><tr><td>Cash and cash equivalents, beginning of year (2022)</td><td>13 463</td></tr><tr><td>Cash and cash equivalents, end of year (2022)</td><td>12 861</td></tr><tr><td>Consolidated IFRS profit before income tax</td><td>84 395</td></tr><tr><td>Tax at 9%</td><td>(7 596)</td></tr><tr><td>Impact of different tax rates</td><td>(239)</td></tr><tr><td>Tax shield of items not subject to income tax</td><td>797</td></tr><tr><td>Tax impact of non deductible items</td><td>(1 232)</td></tr><tr><td>Other income taxes</td><td>(1 360)</td></tr><tr><td>Impact of tax deductibility of other income taxes</td><td>898</td></tr><tr><td>(De)/recognized deferred tax on tax losses</td><td>-</td></tr><tr><td>Investment tax credit accretion</td><td>26</td></tr><tr><td>Effective tax rate</td><td>20,52%</td></tr><tr><td>Tax loss carry forwards at December 31, 2022</td><td>-</td></tr><tr><td>Tax losses for which deferred tax is recognized</td><td>-</td></tr><tr><td>Tax losses for which deferred tax is not recognized</td><td>-</td></tr><tr><td colspan="2">Out of the affiliates seated outside of Hungary, Magyar Telekom discloses the financials of the Macedonian affiliate, Makedonski Telekom as a separate section in its consolidated annual report, based on the relevant annual revenue data, due to the structure of the Group.</td></tr><tr><td colspan="2">Makedonski Telekom (million HUF)</td></tr><tr><td>Revenues</td><td>75 329</td></tr><tr><td>Profit before income tax</td><td>10 765</td></tr><tr><td>Income tax</td><td>1 307</td></tr><tr><td>Profit for the period</td><td>9 458</td></tr><tr><td>Summarized cash flows</td><td></td></tr><tr><td>Net cash generated from operating activities</td><td>27 494</td></tr><tr><td>Net cash from investing activities</td><td>(16 312)</td></tr><tr><td>Dividends/capital reduction paid to Controlling interest</td><td>(5 868)</td></tr><tr><td>Dividends/capital reduction paid to Non-controlling interest</td><td>(4 492)</td></tr><tr><td>Other cash flows from financing activities</td><td>(4 288)</td></tr><tr><td>Net cash used in financing activities</td><td>(14 648)</td></tr></table></div><div><div><div>1NO POVERTY</div><div>10REDUCED INEQUALITIES</div><div>17PARTNERSHIPS FOR THE GOALS</div><div></div></div></div></div>	Number of employees	6 705	Revenues	746 669	Mobile revenues	433 178	Fixed line revenues	237 019	System integration and IT revenues	76 472	Revenue from contracts with customers	738 827	Revenue from other sources	7 842	Operating expenses	(645 712)	Other operating income	8 221	Operating profit	109 178	Interest income	1588	Interest expense	(17 596)	Other finance expense-net	(8 801)	Net financial result	(24 809)	Share of associates' and joint ventures' net profit	26	Profit before income tax	84 395	Income tax	(17 321)	Profit for the year	67 074	Consolidated statements of cash flows		Cash flows from operating activities	195 763	Net cash used in investing activities	(105 256)	Net cash used in financing activities	(91 859)	Change in cash and cash equivalents	(602 )	Cash and cash equivalents, beginning of year (2022)	13 463	Cash and cash equivalents, end of year (2022)	12 861	Consolidated IFRS profit before income tax	84 395	Tax at 9%	(7 596)	Impact of different tax rates	(239)	Tax shield of items not subject to income tax	797	Tax impact of non deductible items	(1 232)	Other income taxes	(1 360)	Impact of tax deductibility of other income taxes	898	(De)/recognized deferred tax on tax losses	-	Investment tax credit accretion	26	Effective tax rate	20,52%	Tax loss carry forwards at December 31, 2022	-	Tax losses for which deferred tax is recognized	-	Tax losses for which deferred tax is not recognized	-	Out of the affiliates seated outside of Hungary, Magyar Telekom discloses the financials of the Macedonian affiliate, Makedonski Telekom as a separate section in its consolidated annual report, based on the relevant annual revenue data, due to the structure of the Group.		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GRI 300: ENVIRONMENTAL STANDARDS 2016							
GRI 301: Materials 2016							
103 1–2–3	Management Approach	Our Approach - Sustainability Strategy (5) Climate and Environment Protection (9)	<a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy">https://www.telekom.hu/about_us/sustainability/sustainability-strategy</a> <a href="http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf">http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf</a> <a href="http://www.telekom.hu/about_us/society_and_environment/environment/management_systems">http://www.telekom.hu/about_us/society_and_environment/environment/management_systems</a>	Magyar Telekom Group upholds its commitment to sustainable development and the environment protection in the Environmental policy. The policy contains obligations for the members of the Magyar Telekom Group both individually and as a Group. Both Magyar Telekom and T-Systems has the certified Integrated Management Systems, included ISO 50001 energy management system and ISO 14001 environmental management system.	Waste management Environmental targets, costs and compliance Sustainability in the supplier chain		 
301–1	Materials used by weight or volume	Our Approach - Sustainability Strategy (5) Climate and Environment Protection (9) Digitalization (21)	<a href="https://www.telekom.hu/sustainability">https://www.telekom.hu/sustainability</a> <a href="http://www.telekom.hu/about_us/society_and_environment/environment/equipment_management">http://www.telekom.hu/about_us/society_and_environment/environment/equipment_management</a> <a href="http://www.t-systems.hu/a-t-systemsrol/iranyelveink/gyartoi-tajekoztato">http://www.t-systems.hu/a-t-systemsrol/iranyelveink/gyartoi-tajekoztato</a> (only HU) <a href="http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf">http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf</a>		Waste management Environmental targets, costs and compliance Sustainability in the supplier chain		
301–2	Recycled input materials used		<a href="http://www.telekom.hu/about_us/society_and_environment">http://www.telekom.hu/about_us/society_and_environment</a> <a href="https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek">https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek</a> (only HU)	Recycled paper used in 2022: 4 022,5 kg.	Waste management Environmental targets, costs and compliance Sustainability in the supplier chain	TC-TL-440a.1	 
301–3	Reclaimed products and their packaging materials		<a href="http://relem.hu/">http://relem.hu/</a> <a href="https://beszerzes.telekom.hu/beszerzes/portal_en?appid=beszerzes&amp;page=english/vendors/information/main.vm">https://beszerzes.telekom.hu/beszerzes/portal_en?appid=beszerzes&amp;page=english/vendors/information/main.vm</a> <a href="http://www.t-systems.hu/a-t-systemsrol/iranyelveink/gyartoi-tajekoztato">http://www.t-systems.hu/a-t-systemsrol/iranyelveink/gyartoi-tajekoztato</a> (only HU) <a href="http://www.telekom.hu/about_us/society_and_environment/environment/equipment_management">http://www.telekom.hu/about_us/society_and_environment/environment/equipment_management</a> <a href="https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek">https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek</a> (only HU)	Magyar Telekom Plc.'s intermediary partner for batteries is ReLEM.	Waste management Environmental targets, costs and compliance Sustainability in the supplier chain	TC-TL-440a.1	
GRI 302: Energy 2016							
103 1–2–3	Management Approach	Our Approach - Sustainability Strategy (5) Climate and Environment Protection (9)	<a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy">https://www.telekom.hu/about_us/sustainability/sustainability-strategy</a> <a href="http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf">http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf</a> <a href="http://www.telekom.hu/about_us/society_and_environment/environment/management_systems">http://www.telekom.hu/about_us/society_and_environment/environment/management_systems</a>	Magyar Telekom Group upholds its commitment to sustainable development and the environment protection in the Environmental policy. The policy contains obligations for the members of the Magyar Telekom Group both individually and as a Group. Both Magyar Telekom and T-Systems has the certified Integrated Management Systems, included ISO 50001 energy management system and ISO 14001 environmental management system.	Climate protection and energy efficiency Environmental targets, costs and compliance Resource consumption		
302–1	Energy consumption within the organization	Climate and Environment Protection (9)	<a href="https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek">https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek</a> (only HU)		Climate protection and energy efficiency Environmental targets, costs and compliance Resource consumption	TC-TL-130a.1	  
302–2	Energy consumption outside of the organization	Climate and Environment Protection (9)	<a href="https://www.telekom.hu/about_us/society_and_environment/environment/equipment_management">https://www.telekom.hu/about_us/society_and_environment/environment/equipment_management</a>		Climate protection and energy efficiency Environmental targets, costs and compliance Resource consumption	TC-TL-130a.1	  
302–3	Energy intensity	Climate and Environment Protection (9)			Climate protection and energy efficiency Environmental targets, costs and compliance Resource consumption	TC-TL-130a.1	   











DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERI-ALITY TOPICS	SASB CODE	SDG TARGET
302-4	Reduction of energy consumption	Climate and Environment Protection (9)	<a href="https://www.telekom.hu/sustainability">https://www.telekom.hu/sustainability</a>		Climate protection and energy efficiency Environmental targets, costs and compliance Resource consumption	TC-TL-130a.1	   
302-5	Reductions in energy requirements of products and services	Climate and Environment Protection (9)			Climate protection and energy efficiency Environmental targets, costs and compliance Resource consumption	TC-TL-130a.1	   
GRI 303: Water and effluents 2018							
303-1	Interactions with water as a shared resource	Climate and Environment Protection (9)	<a href="http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees">http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees</a> <a href="http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf">http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf</a>	Magyar Telekom Group upholds its commitment to sustainable development and the environment protection in the Environmental policy. The policy contains obligations for the members of the Magyar Telekom Group both individually and as a Group.	Environmental targets, costs and compliance Resource consumption		 
303-2	Management of water discharge-related impacts	Climate and Environment Protection (9)	<a href="http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees">http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees</a> <a href="http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf">http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf</a>		Environmental targets, costs and compliance Resource consumption		
303-3	Water withdrawal	Climate and Environment Protection (9)		The usage of groundwater is only a minor part of the total water consumption, the wells are not located in protected areas therefore we only report quantitative data of consumption.	Environmental targets, costs and compliance Resource consumption		
303-4	Water discharge	Climate and Environment Protection (9)			Environmental targets, costs and compliance Resource consumption		
303-5	Water consumption	Climate and Environment Protection (9)			Environmental targets, costs and compliance Resource consumption		
GRI 304: Biodiversity 2016							
103 1-2-3	Management Approach	Climate and Environment Protection (9)	<a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy">https://www.telekom.hu/about_us/sustainability/sustainability-strategy</a> <a href="http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees">http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees</a> <a href="http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf">http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf</a>	Magyar Telekom Group upholds its commitment to sustainable development and the environment protection in the Environmental policy. The policy contains obligations for the members of the Magyar Telekom Group both individually and as a Group.	Environmental targets, costs and compliance		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas		<a href="http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf">http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf</a>		Environmental targets, costs and compliance		  
304-2	Significant impacts of activities, products, and services on biodiversity			Our company avoids operations on protected and Natura 2000 areas.	Environmental targets, costs and compliance		  
304-3	Habitats protected or restored			We do not conduct operations on protected or restored habitats.	Environmental targets, costs and compliance		  
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations			Our operations do not affect habitats of endangered and/or IUCN Red List species.	Environmental targets, costs and compliance		 







DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERIALITY TOPICS	SASB CODE	SDG TARGET
<b>GRI 305: Emissions 2016</b>							
103 1–2–3	Management Approach	Our Approach - Sustainability Strategy (5) Climate and Environment Protection (9)	<a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy">https://www.telekom.hu/about_us/sustainability/sustainability-strategy</a> <a href="http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees">http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees</a> <a href="http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf">http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf</a>	Magyar Telekom Group upholds its commitment to sustainable development and the environment protection in the Environmental policy. The policy contains obligations for the members of the Magyar Telekom Group both individually and as a Group.	Environmental targets, costs and compliance Emissions		 
305–1	Direct (Scope 1) GHG emissions	Climate and Environment Protection (9)			Environmental targets, costs and compliance Emissions		    
305–2	Energy indirect (Scope 2) GHG emissions	Climate and Environment Protection (9)		All emissions are location based. Electricity consumption is given as market based too.	Environmental targets, costs and compliance Emissions		    
305–3	Other indirect (Scope 3) GHG emissions	Climate and Environment Protection (9)			Environmental targets, costs and compliance Emissions		  
305–4	GHG emissions intensity	Climate and Environment Protection (9)		We have conducted the following measurements: Scope 1: g/CO <sub>2</sub> /km, Scope: 2 Gbit/kWh, energy intensity: GJ/HUF M, Scope 3: we measure the emissions related to CPE energy consumption, paper use, emissions of business travel.	Environmental targets, costs and compliance Emissions		  
305–5	Reduction of GHG emissions	Climate and Environment Protection (9)		The quoted emission data refer to Scope 1 and Scope 2 emissions.	Environmental targets, costs and compliance Emissions		  
305–6	Emissions of ozone-depleting substances (ODS)			Magyar Telekom does not produce, export or import substances that damage the ozone layer. No leakage was detected from air-conditioning equipment. Due to the very low number of occurrences Telekom does not report this item.	Environmental targets, costs and compliance Emissions		  
305–7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	Climate and Environment Protection (9)			Environmental targets, costs and compliance Emissions		   
<b>GRI 306: Effluents and Waste 2016</b>							
103 1–2–3	Management Approach	Our Approach - Sustainability Strategy (5) Climate and Environment Protection (9)	<a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy">https://www.telekom.hu/about_us/sustainability/sustainability-strategy</a> <a href="http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees">http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees</a> <a href="http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf">http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf</a>	Magyar Telekom Group upholds its commitment to sustainable development and the environment protection in the Environmental policy. The policy contains obligations for the members of the Magyar Telekom Group both individually and as a Group.	Environmental targets, costs and compliance		
306–1	Water discharge by quality and destination	Climate and Environment Protection (9)		Magyar Telekom Group only uses potable water for social purposes (we do not use water for technology purposes) therefore the quantity of sewage water output is the same as the potable water consumption	Environmental targets, costs and compliance		  
306–2	Waste by type and disposal method	Climate and Environment Protection (9)			Environmental targets, costs and compliance		  
306–3	Significant spills			There was no significant leakage or unsupervised output.	Environmental targets, costs and compliance		    
306–4	Transport of hazardous waste			Magyar Telekom does not import or export or manage hazardous waste.	Environmental targets, costs and compliance		 
306–5	Water bodies affected by water discharges and/or runoff			Our operations do not directly affect water bodies, water discharges and/or freshwater habitat.	Environmental targets, costs and compliance		 







DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERI-ALITY TOPICS	SASB CODE	SDG TARGET																																																																																																																									
GRI 307: Environmental Compliance 2016																																																																																																																																
103 1–2–3	Management Approach	Our Approach - Sustainability Strategy (5) Climate and Environment Protection (9)	<a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy">https://www.telekom.hu/about_us/sustainability/sustainability-strategy</a> <a href="http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees">http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees</a> <a href="http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf">http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf</a>	Magyar Telekom Group upholds its commitment to sustainable development and the environment protection in the Environmental policy. The policy contains obligations for the members of the Magyar Telekom Group both individually and as a Group.	Environmental targets, costs and compliance																																																																																																																											
307–1	Non-compliance with environmental laws and regulations	Climate and Environment Protection (9)																																																																																																																														
GRI 308: Supplier Environmental Assessment 2016																																																																																																																																
103 1–2–3	Management Approach	Stakeholders - Suppliers (43)			Sustainability in the supplier chain Supplier relations																																																																																																																											
308–1	New suppliers that were screened using environmental criteria	Stakeholders - Suppliers (43)			Sustainability in the supplier chain Supplier relations																																																																																																																											
308–2	Negative environmental impacts in the supply chain and actions taken	Stakeholders - Suppliers (43)			Sustainability in the supplier chain Supplier relations																																																																																																																											
GRI 400: SOCIAL STANDARDS 2016																																																																																																																																
GRI 401: Employment 2016																																																																																																																																
103 1–2–3	Management Approach	Diversity and Equal Opportunities (30)			Human rights, equal opportunities																																																																																																																											
401–1	New employee hires and employee turnover			<div>Fluctuation at Magyar Telekom Group (Plc./Group)</div> <table><tr><th></th><th>2018</th><th>2019</th><th>2020</th><th>2021</th><th>2022</th></tr><tr><td>Total fluctuation</td><td>16.47%/17.51%</td><td>16.47%/15.1%</td><td>17.20%/19.27%</td><td>11.0%/11.53%</td><td>7.3%/8.32%</td></tr><tr><td>Termination initiated by the employee</td><td>6.81%/18.84%</td><td>6.81%/15.91%</td><td>2.70%/10.92%</td><td>3.40%/15.58%</td><td>4.3%/15.42%</td></tr></table> <div>Fluctuation at Magyar Telekom Group in 2022</div> <table><tr><th></th><th>MAGYAR TELEKOM GROUP</th><th>MAGYAR TELEKOM PLC.</th><th>T-SYSTEMS HUNGARY</th><th>MAKEDONKSI TELEKOM</th></tr><tr><td>Total fluctuation</td><td>8.32%</td><td>7.30%</td><td>14.60%</td><td>10.00%</td></tr><tr><td>Termination initiated by the employee</td><td>15.42%</td><td>4.30%</td><td>7.00%</td><td>97.70%</td></tr></table> <div>Fluctuation at Magyar Telekom Plc. in 2022</div> <table><tr><th></th><th>FEMALE</th><th>MALE</th></tr><tr><td>Total fluctuation</td><td>9.0%</td><td>6.3%</td></tr><tr><td>Termination initiated by the employee</td><td>4.80%</td><td>4.1%</td></tr></table> <div>Age groups and gender distribution of new hires at Magyar Telekom Plc. in 2022</div> <table><tr><th>AGE GROUP</th><th>19–25</th><th>26–30</th><th>31–35</th><th>36–40</th><th>41–45</th><th>46–50</th><th>51–55</th><th>56+</th><th>TOTAL</th></tr><tr><td>Male</td><td>51</td><td>37</td><td>27</td><td>14</td><td>9</td><td>1</td><td>4</td><td>4</td><td>147</td></tr><tr><td>Female</td><td>33</td><td>25</td><td>20</td><td>13</td><td>4</td><td>3</td><td>1</td><td>0</td><td>99</td></tr><tr><td>Total headcount</td><td>84</td><td>62</td><td>44</td><td>27</td><td>13</td><td>4</td><td>5</td><td>4</td><td>246</td></tr></table> <div>Age groups and gender distribution of new hires at Magyar Telekom Group in 2022</div> <table><tr><th>AGE GROUP</th><th>19–25</th><th>26–30</th><th>31–35</th><th>36–40</th><th>41–45</th><th>46–50</th><th>51–55</th><th>56+</th><th>TOTAL</th></tr><tr><td>Male</td><td>76</td><td>68</td><td>39</td><td>31</td><td>18</td><td>13</td><td>8</td><td>7</td><td>260</td></tr><tr><td>Female</td><td>48</td><td>35</td><td>25</td><td>21</td><td>14</td><td>6</td><td>5</td><td>1</td><td>155</td></tr><tr><td>Total headcount</td><td>124</td><td>103</td><td>64</td><td>52</td><td>32</td><td>19</td><td>13</td><td>8</td><td>413</td></tr></table>		2018	2019	2020	2021	2022	Total fluctuation	16.47%/17.51%	16.47%/15.1%	17.20%/19.27%	11.0%/11.53%	7.3%/8.32%	Termination initiated by the employee	6.81%/18.84%	6.81%/15.91%	2.70%/10.92%	3.40%/15.58%	4.3%/15.42%		MAGYAR TELEKOM GROUP	MAGYAR TELEKOM PLC.	T-SYSTEMS HUNGARY	MAKEDONKSI TELEKOM	Total fluctuation	8.32%	7.30%	14.60%	10.00%	Termination initiated by the employee	15.42%	4.30%	7.00%	97.70%		FEMALE	MALE	Total fluctuation	9.0%	6.3%	Termination initiated by the employee	4.80%	4.1%	AGE GROUP	19–25	26–30	31–35	36–40	41–45	46–50	51–55	56+	TOTAL	Male	51	37	27	14	9	1	4	4	147	Female	33	25	20	13	4	3	1	0	99	Total headcount	84	62	44	27	13	4	5	4	246	AGE GROUP	19–25	26–30	31–35	36–40	41–45	46–50	51–55	56+	TOTAL	Male	76	68	39	31	18	13	8	7	260	Female	48	35	25	21	14	6	5	1	155	Total headcount	124	103	64	52	32	19	13	8	413	Human rights, equal opportunities Involvement of our employees Talent management	  
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401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Diversity and Equal Opportunities (30)		Magyar Telekom provides a broad range of welfare and social benefits. Some of them are provided automatically whereas others can be obtained upon satisfying certain conditions while there are insurance types of benefits, too. The provision of certain benefits is subject to the employee's own contribution. The provision of social benefits and benefits that are not provided automatically is regulated in the Col-lective Agreement and the relevant policies. We also provide telecommunication discounts and other benefits. Contributions to public health, pension and unemployment benefit schemes are made by the employer to the required extent and until the statutory deadline. With respect to additional payments from 2019 the additional contribution to funds ceased. Meanwhile we deduct voluntary pension and healthcare membership fees and transfer them to the cash funds on behalf of the employee. The membership fee may be a fixed amount or a percentage, which is to be stated in the employee declaration.	Involvement of our employees Corporate compliance		  
401-3	Parental leave	Diversity and Equal Opportunities (30)			Involvement of our employees		 
GRI 402: Labor/Management Relations 2016							
103 1-2-3	Management Approach			Magyar Telekom has long traditions of negotiation with employee representative bodies. Employee representation bodies are treated as partners in the operation of the company. At present two unions and workers council operate at Magyar Telekom, communication with them runs on two levels. Central decisions concerning the whole Company, when the employee representation bodies need to be consulted, are deliberated with the Central Workers Council and the representatives delegated by the trade unions, either in the frame of joint consultation (Interest Reconciliation Council), or separately, depending on the nature of the matter discussed. Central communica-tion is managed both verbally (negotiation) and in writing. The Chief People Officer and the responsible HR Business partner are mana-ging central-level communication with the employee representation bodies. Interest enforcement issues concerning a given governance area are also discussed locally with the representatives of the trade unions and the local workers council. The HR Business Partners of the governance area are responsible for communication with the local employee representation bodies. In line with the provisions of Act V of 2013 on the Hungarian Civil Code one third of Supervisory Board members are employee representatives. The employee representatives of the Supervisory Board are nominated by the Central Works Council, in consideration of the opinion of trade unions operating at the Company. The General Meeting is obliged to elect persons nominated by the Central Works Council to the Supervisory Board unless there are underlying circumstances that serve as grounds for exclusion. On December 31, 2022 the Supervisory Board had two employee representatives: Tamás Lichnovszky and Zsoltné Varga.	Involvement of our employees Corporate compliance		
402-1	Minimum notice periods regarding operational changes			Trade union and the workers council (Central Workers Council) must be consulted and their opinion solicited on significant decisions resulting in organizational changes or changes affecting a large group of employees. In organization restructuring decisions the collec-tive bargaining bodies have 7 days to submit their comments, in other cases 15 days. The measure in question may not be implemented during this 15-day period. Trade unions and workers councils (Central Workers Council) must be consulted with regard to draft resolu-tions, aiming at organizational changes without regard to the number of employees concerned.	Involvement of our employees Corporate compliance		
GRI 403: Occupational Health and Safety 2018							
403-1	Occupational health and safety management system	Stakeholders - Suppliers (43)	<a href="http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees">http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees</a>	Magyar Telekom looks at health and safety as a precondition of the success of the company that play an important role in the satisfaction of our employees as well as in the quality of work and corporate culture. That is the reason why the company is committed to operate the Workplace Healthcare and Occupational Safety Management System that ensures the successful fulfillment of the objectives. The results justify Telekom's work, i.e. as a result of the year 2021 audit the Company successfully renewed the MEBIR certification. Magyar Telekom together with all of its national and international subsidiaries have the DEKRA Certification ISO 45001:2018. The company also demands suppliers compliance with its health and safety regulations.	Occupational health and safety		
403-2	Hazard identification, risk assessment, and incident investigation			In 2022, the full corporate health and safety risk assessment was renewed for both Magyar Telekom and T-Systems. Occupational health and safety risk assessments were carried out at 101 sites and 389 organisational units. Target inspections (on-site work inspections) were carried out in 16 cases at the TU and ÉMKI technical teams responsible for operations and troubleshooting. MEBIR site internal audit covered 11 sites. Measures have been taken to correct the deficiencies identified during the visits.	Occupational health and safety		
403-3	Occupational health services			As in previous years, we put extra emphasis on health, the support of different medical checkups in 2022, too. Apart from the regular oc-cupational healthcare services we provided our employees with family practitioner-type care in Budapest, and offered different medical checkups across the country. A total of 5406 people (MT: 4716 TSM: 690) took part in the occupational health assessments. As part of the assessments, ophthalmology examinations took place in 4788 cases (MT: 4057, TSM: 731). As a result of the examinations 573 people (MT: 494, TSM: 79) received allowance for prescription glasses. In 2022, a total of 1509 employees (MT:1265, TSM:244) have attended health screenings offered independent from the regular occupational health examinations.	Occupational health and safety		
403-4	Worker participation, con-sultation, and communica-tion on occupational health and safety			In accordance with the occupational health and safety regulations there are health and safety committees formed by health and safety employee: at Magyar Telekom 7 and at T-Systems 2 representatives serve in the safety committees, depending on the risk category of the respective areas the occupational safety risks and interests - are weighted. Magyar Telekom held an employee representative election in 2021. In general the technical areas have the highest representation rate in the weighted structure, but representatives cover all relevant company organizations. The safety committees and the employer have regular consultation forums where they work closely together on key health and safety issues, goals and perspectives.	Occupational health and safety		
403-5	Worker training on occupa-tional health and safety			All Magyar Telekom employees are required to complete their occupational health and safety training along their onboarding, they are obliged to refresh their knowledge via completing a training course bi-annually. Physical workers attend courses specific to their activiti-es: e.g. a joint course with the electric power provider regarding work on shared poles, and first-aid training.	Occupational health and safety		
403-6	Promotion of worker health		<a href="http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees">http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees</a>	The regulatory function of the Central Works Council (Occupational Safety Rules and Regulations) guarantees that employees may work in a healthy and safe environment and the Council also has the right to express its opinion in such matters. The Occupational Safety Rules and Regulations determines the scope of personal protective equipment, the environment to provide healthy and safe workplaces that also ensures compliance with the effective legislation as well as the MSZ ISO 45001:2018 MEBIR (Occupational Health and Safety Management System) safety standards. Once a year, employees can choose from a range of preventive medical checkup packages, provided by our contractual medical services provider. A gym is available at the Telekom HQ building. And the EAP (Employee Assistance Program) – “You can count on us” Program offers help to colleagues in overcoming their specific problems and challenges.	Occupational health and safety		








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403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships			In 2022, we put extra emphasis on the Covid-19 infection prevention work. As part of the effort, we provided safe working conditions to colleagues working in the shops. They received masks, gloves, hand sanitizers. We limited the number of customers present in the shops, and equipped the desks with plexiglass screens. In case of potential infections, we tested the affected colleagues.	Occupational health and safety																																																		
403-8	Workers covered by an occupational health and safety management system		<a href="http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees">http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees</a>	Magyar Telekom together with all of its national and international subsidiaries have the DEKRA Certification ISO 45001:2018 (Occupational Health and Safety Management System). The company also demands suppliers compliance with its health and safety regulations	Occupational health and safety																																																		
403-9	Work-related injuries			Magyar Telekom Plc.: There were no occupational fatal accidents in 2022. There were 37 registered injuries: 19 cases involved the loss of more than 3 workdays, 2 cases involved the loss of 1 to 3 workdays, 14 cases did not involve loss of workdays and there were 2 unsubstantiated accident, i.e. a total of 687 lost workdays. Distribution of injury types: 33 phisical activity related injuries, 2 office injuries. Most frequent recorded injuries: 5 cases of fractures, 3 cases of electric shock, 9 cases of cut injuries or open wounds, 4 cases of strains and sprains, 14 cases of bruises. There was no accident at T-Systems Hungary. Makedonski Telekom: 0 fatal accidents, 10 accidents at work subject to reporting obligations, i.e. a total of 120 lost workdays.	Occupational health and safety		  																																																
<div>Workplace Accidents at Magyar Telekom Group</div> <table><tr><th></th><th>2018</th><th>2019</th><th>2020</th><th>2021</th><th>2022</th></tr><tr><td>Magyar Telekom Plc.</td><td>27</td><td>77</td><td>37</td><td>30</td><td>37</td></tr><tr><td>Makedonski Telekom</td><td>10</td><td>11</td><td>4</td><td>6</td><td>10</td></tr><tr><td>T-Systems Hungary</td><td>2</td><td>0</td><td>0</td><td>0</td><td>0</td></tr></table> <div>Accident ratio for one thousand employee at Magyar Telekom Group</div> <table><tr><th></th><th>2018</th><th>2019</th><th>2020</th><th>2021</th><th>2022</th></tr><tr><td>Magyar Telekom Plc.</td><td>4</td><td>12</td><td>7</td><td>6</td><td>8</td></tr><tr><td>Makedonski Telekom</td><td>9</td><td>10</td><td>4</td><td>7</td><td>14</td></tr><tr><td>T-Systems Hungary</td><td>1</td><td>0</td><td>0</td><td>0</td><td>0</td></tr></table>									2018	2019	2020	2021	2022	Magyar Telekom Plc.	27	77	37	30	37	Makedonski Telekom	10	11	4	6	10	T-Systems Hungary	2	0	0	0	0		2018	2019	2020	2021	2022	Magyar Telekom Plc.	4	12	7	6	8	Makedonski Telekom	9	10	4	7	14	T-Systems Hungary	1	0	0	0	0
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Makedonski Telekom	9	10	4	7	14																																																		
T-Systems Hungary	1	0	0	0	0																																																		
403-10	Work-related ill health			At Magyar Telekom Group there were no occupational diseases or increased exposures in 2022.	Occupational health and safety		  																																																
GRI 404: Training and Education 2016																																																							
103 1-2-3	Management Approach			<p>Magyar Telekom Group lays special emphasis on the constant training and development of its employees and on supporting the application of the acquired knowledge. Magyar Telekom Group is a key player in Hungary's ICT sector. In this industry, awareness about and adoption of new trends and research findings is imperative on managerial and non-managerial levels alike.</p> <p>Our training-development strategy is aligned with the renewal of our organizational structure and the business objectives defined upon reconciliation with Deutsche Telekom. We discuss the training implications of the business objectives with the organizational units and ensure that the most appropriate training programs be available for the focused development of the skills foreseeably required in the future. During the year, we keep track of the programs' effectiveness at retrospective sessions, and if necessary, we fine-tune them so that they more effectively support our business and individual development objectives. Following the training sessions, we survey participants' satisfaction with the programs.</p> <p>A key effectiveness improvement component of our training strategy is the promotion of e-learning courses, thus we have established a digital learning platform that enables anyone, anywhere and anytime to access the training most relevant to him or her. By this, we democratize access to knowledge. The platform offers many online learning journeys designed to support efficient work, which anyone can opt to complete in line with his or her specific needs. The platform represents an approach to personal development that puts data, student-experience and customized courses into the focus. Our goal with SmartApp is to implement a forward-looking learning methodology, which integrates the systems we had used before for supporting colleagues' development. The launch of the platform is only the first step, which will be gradually followed by the addition of further functions and availability on mobile devices later. At the same time, we use blended learning programs designed for specific target groups to prepare colleagues for new roles and to build our management succession pool.</p> <p>Being a caring company, we have put an outplacement program in place to offer different activities to employees affected by downsizing that support them in finding new jobs, and we also provide those on permanent leave access to the online learning platforms.</p>	Involvement of our employees Talent management Initiatives to eliminate the digital divide																																																		









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404-1	Average hours of training per year per employee			<div><div>Ratio of distance learning at Magyar Telekom Group (%)</div><table><tr><th></th><th>2018</th><th>2019</th><th>2020</th><th>2021</th><th>2022</th></tr><tr><td>Magyar Telekom Plc.</td><td>36</td><td>35</td><td>48</td><td>45</td><td>42.8</td></tr><tr><td>Makedonski Telekom</td><td>22</td><td>1</td><td>53.63</td><td>100</td><td>67.9</td></tr><tr><td>T-Systems Hungary</td><td>25</td><td>56</td><td>89</td><td>77</td><td>22</td></tr></table><div>Training days per capita at Magyar Telekom Group</div><table><tr><th></th><th>2018</th><th>2019</th><th>2020</th><th>2021</th><th>2022</th></tr><tr><td>Magyar Telekom Plc.</td><td>4</td><td>5</td><td>3</td><td>3,2</td><td>3</td></tr><tr><td>Makedonski Telekom</td><td>13</td><td>20</td><td>2.22</td><td>1.55</td><td>0.85</td></tr><tr><td>T-Systems Hungary</td><td>4</td><td>2</td><td>1.64</td><td>1.55</td><td>2.62</td></tr></table><div>Annual average training hours per capita at Magyar Telekom Group, 2022</div><table><tr><th></th><th>HOURS</th></tr><tr><td>Magyar Telekom Plc.</td><td>26</td></tr><tr><td>Makedonski Telekom</td><td>21</td></tr><tr><td>T-Systems Hungary</td><td>4</td></tr></table></div>		2018	2019	2020	2021	2022	Magyar Telekom Plc.	36	35	48	45	42.8	Makedonski Telekom	22	1	53.63	100	67.9	T-Systems Hungary	25	56	89	77	22		2018	2019	2020	2021	2022	Magyar Telekom Plc.	4	5	3	3,2	3	Makedonski Telekom	13	20	2.22	1.55	0.85	T-Systems Hungary	4	2	1.64	1.55	2.62		HOURS	Magyar Telekom Plc.	26	Makedonski Telekom	21	T-Systems Hungary	4	Involvement of our employees Talent management Initiatives to eliminate the digital divide		<div>4 QUALITY EDUCATION</div> <div>5 GENDER EQUALITY</div> <div>8 DECENT WORK AND ECONOMIC GROWTH</div>
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T-Systems Hungary	4																																																														
404-2	Programs for upgrading employee skills and transition assistance programs	Diversity and Equal Opportunities (30)		<p>The development of our employees has been a priority in Magyar Telekom's strategy for years. In a rapidly changing and challenging business environment, it is not enough to create outstanding training programmes to maintain our role as a market leader and innovator, we need to support organisations in creating a learning culture. That is why Telekom's training area unified its competence development portfolio in 2020 under the name SMART and made it available to the widest possible audience through digital tools; in 2021, it introduced a dedicated time framework to support effective learning; and in 2022, it developed a competence development programme package, TOP5 Super Skills, which is freely available to the entire workforce.</p> <p>With the TOP5 programme for 3,000 employees, the development area aimed to help Telekom employees find and develop their talent in a way that serves real business goals. The 12 competencies included topical and valuable themes such as data-driven thinking, Cloud technologies, digital tools and skills development, resilience and English language skills.</p> <p>In addition to the TOP5-like core development programmes, a quarterly training plan prepared at business unit level provides guidance for the current development activities of the period in terms of professional training, skills development programmes, agile training, leadership development and conferences. In all areas of the company undergoing agile transformation, we have kick-started the transformation with strong induction training and mindset shaping training. The strengthening of the agile mindset and agile operations is continuously developed by an internal agile coach team supporting the areas/organisations in situations that are currently perceived and need to be remedied. Knowledge sharing and self-development are encouraged at the corporate level. Centrally delivered programmes in the past year included the Skilljet leadership development programme, which used gamified online and face-to-face workshops to address key dilemmas in leadership, with solutions to help people become better leaders. EEn addition, our leaders were able to participate in the LevelUp Next Gen, Lead First, Leadership hub platform programmes organised by the parent company, which also broadened their knowledge in internationalisation. Employees also had the opportunity to participate in the Group's training courses through the Future Skilling programme and even learn a new profession through learning journeys in software development, digital marketing, data analysis. In 2022, Telekom launched SmartApp, its innovative learning framework for self-development. The system, available on PC and mobile phone, gives our colleagues access to all training opportunities, including hundreds of thousands of fresh professional training courses, books and videos covering the widest range of professions. Many of these courses provide internationally recognised qualifications.</p> <p>This year, several events have been organised to support the development of colleagues not only at local level (Super Skills Day) but also at international level (DT Group's YouLearn Day initiative).</p> <p>In addition to these platforms, they can also (if the epidemiological situation allows) expand their knowledge through face-to-face training and conferences. We also work with our supply partners on tool introduction to ensure new knowledge acquisition. To reinforce the importance of self-development and to raise awareness of the opportunities available, we have launched several campaigns each year, where inspiring external speakers, training sessions, development workshops, learning palettes and tool demonstrations have focused staff's attention on learning, which has become a necessity for all professions in a fast-changing world.</p> <p>After registering in the outplacement programme, staff affected by redundancies can benefit from the following services: two-day group labour market training; active job search support; financial support for training and retraining in line with labour market requirements; personal psychological and labour law counselling; follow-up support for participants and monitoring of their placement.</p>	Involvement of our employees Talent management Initiatives to eliminate the digital divide		<div>8 DECENT WORK AND ECONOMIC GROWTH</div>																																																								






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404-3	Percentage of employees receiving regular performance and career development reviews			To strengthen the culture of performance appraisal, career management and feedback, a new flexible framework was introduced in 2018 that supports both business and personal success, putting the growth mindset approach into practice and strengthening the culture of recognition. FUTAM can be tailored to individual and current business needs at both organisational and staff level. It provides a framework for guiding employee development, is based on collaboration and feedback rather than evaluation, and its new module in 2019, developed as part of the Agile transformation, further deepened these values in line with the new way of working. By year-end, 3 086 colleagues had participated in the regular competency feedback process. The framework has not changed, the platform used, FUTAM, has been renewed in response to customer feedback to make it a more user-friendly tool.	Involvement of our employees Talent management Initiatives to eliminate the digital divide																									
GRI 405: Diversity and Equal Opportunity 2016																														
103 1-2-3	Management Approach	Diversity and Equal Opportunities (30)	<a href="https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf">https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf">https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Telekom_diversity__equity_and_inclusion_group_policy.pdf">https://www.telekom.hu/static-tr/sw/file/Telekom_diversity__equity_and_inclusion_group_policy.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Telekom_Equal_opportunities_plan.pdf">https://www.telekom.hu/static-tr/sw/file/Telekom_Equal_opportunities_plan.pdf</a>		Human rights, equal opportunities																									
405-1	Diversity of governance bodies and employees	Diversity and Equal Opportunities (30)			Human rights, equal opportunities																									
405-2	Ratio of basic salary and remuneration of women to men	Diversity and Equal Opportunities (30)		<div>Ratio of basic salary and remuneration of women to men</div> <table><tr><th></th><th>Top managers</th><th>Senior managers</th><th>Middle managers</th><th>Employees<sup>6</sup></th><th>Specialists</th></tr><tr><td>Magyar Telekom Plc.<sup>6</sup></td><td>103%</td><td>95%</td><td>93%</td><td>N/A</td><td>94%</td></tr><tr><td>Makedonski Telekom<sup>7</sup></td><td>N/A</td><td>99.7%</td><td>91.4%</td><td>99.2%</td><td>101.4%</td></tr><tr><td>T-Systems Hungary<sup>6</sup></td><td>N/A</td><td>93%</td><td>75%</td><td>N/A</td><td>96%</td></tr></table>		Top managers	Senior managers	Middle managers	Employees <sup>6</sup>	Specialists	Magyar Telekom Plc. <sup>6</sup>	103%	95%	93%	N/A	94%	Makedonski Telekom <sup>7</sup>	N/A	99.7%	91.4%	99.2%	101.4%	T-Systems Hungary <sup>6</sup>	N/A	93%	75%	N/A	96%	Human rights, equal opportunities	
	Top managers	Senior managers	Middle managers	Employees <sup>6</sup>	Specialists																									
Magyar Telekom Plc. <sup>6</sup>	103%	95%	93%	N/A	94%																									
Makedonski Telekom <sup>7</sup>	N/A	99.7%	91.4%	99.2%	101.4%																									
T-Systems Hungary <sup>6</sup>	N/A	93%	75%	N/A	96%																									
GRI 406: Non-discrimination 2016																														
103 1-2-3	Management Approach	Diversity and Equal Opportunities (30)	<a href="https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf">https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Telekom_Group_policy_on_employee_relations.pdf">https://www.telekom.hu/static-tr/sw/file/Telekom_Group_policy_on_employee_relations.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf">https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Telekom_diversity__equity_and_inclusion_group_policy.pdf">https://www.telekom.hu/static-tr/sw/file/Telekom_diversity__equity_and_inclusion_group_policy.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Telekom_Equal_opportunities_plan.pdf">https://www.telekom.hu/static-tr/sw/file/Telekom_Equal_opportunities_plan.pdf</a>	Magyar Telekom Group's Code of Conduct and the Code of Human Rights and Social Principles are a summary of the corporate compliance requirements; these documents set out the common values of the Group and it is also the token of the strong position, reputation and successful future of Telekom. Everyone at Magyar Telekom Group must comply with these Codes from staff employees to the Board members. In addition to the employees the contracted partners of Magyar Telekom Group are also required to learn and accept these values when registering on the Company's procurement site. In order to effectively develop Magyar Telekom's Diversity and Equal Opportunities efforts. An anonymous employee survey measuring the diversity and inclusion culture of the company was conducted in 2018 January and repeated in 2020. According to the recent survey results from January 2020 based on the feedback of the employees, Telekom's perception as an open and inclusive workplace has improved in all areas affected by the action plan.	Human rights, equal opportunities																									
406-1	Incidents of discrimination and corrective actions taken			In 2021 the Office of the Competent Commissioner for Fundamental Rights (AJBH) initiated proceedings against Magyar Telekom Plc on one instance. The complaint that was issued by a customer on the grounds of violating equal opportunity treatment was closed upon dismissal of the complaint in 2022.	Human rights, equal opportunities																									
GRI 407: Freedom of Association and Collective Bargaining 2016																														
103 1-2-3	Management Approach	Stakeholders - Suppliers (43)	<a href="https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf">https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Telekom_Group_policy_on_employee_relations.pdf">https://www.telekom.hu/static-tr/sw/file/Telekom_Group_policy_on_employee_relations.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf">https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Telekom_diversity__equity_and_inclusion_group_policy.pdf">https://www.telekom.hu/static-tr/sw/file/Telekom_diversity__equity_and_inclusion_group_policy.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Telekom_Equal_opportunities_plan.pdf">https://www.telekom.hu/static-tr/sw/file/Telekom_Equal_opportunities_plan.pdf</a>	Magyar Telekom Group has acknowledged the freedom of association and the right for collective bargaining in its Code of Human Rights and Social Principles. Magyar Telekom strives to maintain a dialogue and cooperation with employee representation bodies in the spirit of openness and trust. The Code of Human Rights and Social Principles and the long-standing relationship between Magyar Telekom's management and the employee representation bodies are the guarantee that the relevant rights are observed. The agreement, which can be terminated by either party with three months' notice, applies to all Magyar Telekom Plc. employees except the CEO, regardless of their union membership status. Wage terms in the collective bargaining agreement must be renegotiated annually. If the employment is terminated due to reasons related to the employer's operation, employees are entitled to a specific amount of severance pay surplus, which depends on the tenure of the employee. In addition to the collective bargaining agreement, employees of our Hungarian operations are generally covered by the Act I of 2012 on the Labor Code, which imposes various restrictions on the involuntary termination of employment. The Labor Code protects employee interests through two different labor organizations: the Trade Union and the Workers' Council. The Trade Union, as the official representative of employee interests in negotiations relating to the terms of employment, has the right to be informed of all corporate measures that may significantly affect the interests of employees and to commence legal action against the Company for employmentrelated conduct that infringes an employment rule. In addition, the Workers' Council directly represents employee interests in dealings with management and decides jointly with manageme on matters involving employee welfare funds and institutions. The Workers' Council must be informed semi-annually on issues affecting our economic performance and changes in wages, employment conditions and working hours. The Workers' Council must also be consulted on corporate measures affecting employees. We believe that our relations with our employees are good. We have not experienced any labor strikes or disruptions since our formation. The above rights, policies and practices are transparent to the employees, they are represented in relevant internal communication materials and intranet sites and the employee representation bodies also take part in their active promotion.	Sustainability in the supplier chain Supplier relations																									

<sup>6</sup> Definition for employee category at Magyar Telekom HU: Top Managers: CEO and CxO; Senior managers: Leadership team members; Middle managers: CoEL, Chapter Lead, head of department (all other leader); Specialist: all employees who don't belong to the above categories.  
<sup>7</sup> Definition for employee category at Makedonski Telekom: Senior Managers (First Line Management/Supervisor): Unit heads / Team leaders / Supervisors; Middle Managers: Directors and Senior Heads; Employees: all other grade employees (L1, L2, L3 lower grade); Specialists: Expert / Senior professionals (Level L3 upper grade).  
<sup>8</sup> In 2021 the 'employee' category was merged with the 'specialists' category at Magyar Telekom Plc. and T-Systems Hungary Ltd., therefore no data is available in this category.






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407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Stakeholders - Suppliers (43)		99,9% of the employment contracts of Magyar Telekom Plc. employees operating in Hungary fall under collective bargaining agreements (the CEO and Deputies are excluded from the scope of the Collective Agreement). 100% of the employment contracts of T-Systems Hungary employees operating in Hungary fall under collective bargaining agreements, the same ratio for Macedonian workers is 82.62% in 2022.	Sustainability in the supplier chain Supplier relations		
GRI 408: Child Labor 2016							
103 1-2-3	Management Approach	Stakeholders - Suppliers (43)	<a href="https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf">https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf">https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf</a> <a href="https://beszerzes.telekom.hu/beszerzes/portal/objects-beszerzes/doc/mukodesi_kodex_en.pdf">https://beszerzes.telekom.hu/beszerzes/portal/objects-beszerzes/doc/mukodesi_kodex_en.pdf</a>	Magyar Telekom Group is an ICT company committed to respect and support human and social rights at all times in view of our tasks arising from technological development and digitalization. In line with the basic principles set out in the Code of Human Rights & Social Principles our company stands up for the protection of human rights as set forth in international human rights treaties, including the protection of freedom of speech and protection of the right for ones' own belief. Furthermore, the company rejects child labor, all types of forced or compulsory labor, and uses all measures to fight any kind of human trafficking and modern slavery. The definition of 'child labor' is defined in accordance with the ILO Minimun Age Convention, and the definition of 'forced labor' is defined in accordance with the ILO Forced Labor Convention (No. 29)and the Abolition of Forced Labor Convention. (No. 105)	Sustainability in the supplier chain Supplier relations Regulatory compliance Corporate compliance		
408-1	Operations and suppliers at significant risk for incidents of child labor	Stakeholders - Suppliers (43)	<a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy/sustainable-supplier-chain-management-process">https://www.telekom.hu/about_us/sustainability/sustainability-strategy/sustainable-supplier-chain-management-process</a> <a href="https://beszerzes.telekom.hu/beszerzes/portal?appid=-beszerzes&amp;page=szallitoinknak/kornyezetvedelem/fooldalvm">https://beszerzes.telekom.hu/beszerzes/portal?appid=-beszerzes&amp;page=szallitoinknak/kornyezetvedelem/fooldalvm</a>	Deutsche Telekom Group as our parent company is responsible for the maintenance and supervision of compliance of global suppliers through monitoring and audits. For further information of the method of classification of global suppliers and the relevant results, please visit the indicated website.	Sustainability in the supplier chain Supplier relations Regulatory compliance Corporate compliance Human rights, equal opportunities		 
GRI 409: Forced or Compulsory Labor 2016							
103 1-2-3	Management Approach	Stakeholders - Suppliers (43)	<a href="https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf">https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf">https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf</a> <a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy/sustainable-supplier-chain-management-process">https://www.telekom.hu/about_us/sustainability/sustainability-strategy/sustainable-supplier-chain-management-process</a> <a href="https://beszerzes.telekom.hu/beszerzes/portal?appid=-beszerzes&amp;page=szallitoinknak/kornyezetvedelem/fooldalvm">https://beszerzes.telekom.hu/beszerzes/portal?appid=-beszerzes&amp;page=szallitoinknak/kornyezetvedelem/fooldalvm</a>	Magyar Telekom Group is an ICT company committed to respect and support human and social rights at all times in view of our tasks arising from technological development and digitalization. In line with the basic principles set out in the Code of Human Rights & Social Principles our company stands up for the protection of human rights as set forth in international human rights treaties, including the protection of freedom of speech and protection of the right for ones' own belief. Furthermore, the company rejects child labor, all types of forced or compulsory labor, and uses all measures to fight any kind of human trafficking and modern slavery.  Beyond this process, the company is aware that it is sometimes difficult to distinguish between right and wrong. In order to help employees make the right decision, secure internal channels managed by the corporate compliance area are available to employees. Employees can contact Magyar Telekom's "Kérdezz!" ("Ask me!") line whenever they have a question or concern, or are unsure of the right thing to do in any situation. Employees can make complaints and comments about abuse and misconduct on Magyar Telekom's Tell me! line or on the Tell me! line managed by the Deutsche Telekom Group, while from summer 2022 the Group will also use a platform managed by an external service provider in order to fully comply with the new EU Whistleblowing Directive. The main guidelines for the investigation of complaints and observations reported on abuse and misconduct, as well as the corporate guidance on the process, are available on the company's internal staff platform. The key aspects of the policy are anonymity, confidentiality and the protection of personal security.	Sustainability in the supplier chain Supplier relations Regulatory compliance Corporate compliance Human rights, equal opportunities		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Stakeholders - Suppliers (43)	<a href="https://www.telekom.hu/about_us/sustainability/sustainability-strategy/sustainable-supplier-chain-management-process">https://www.telekom.hu/about_us/sustainability/sustainability-strategy/sustainable-supplier-chain-management-process</a> <a href="https://beszerzes.telekom.hu/beszerzes/portal?appid=-beszerzes&amp;page=szallitoinknak/kornyezetvedelem/fooldalvm">https://beszerzes.telekom.hu/beszerzes/portal?appid=-beszerzes&amp;page=szallitoinknak/kornyezetvedelem/fooldalvm</a>	Deutsche Telekom Group as our parent company is responsible for the maintenance and supervision of compliance of global suppliers through monitoring and audits. For further information of the method of classification of global suppliers and the relevant results, please visit the indicated website.	Sustainability in the supplier chain Supplier relations Regulatory compliance Corporate compliance Human rights, equal opportunities		
GRI 410: Security Practices 2016							
103 1-2-3	Management Approach		<a href="http://www.telekom.hu/static-tr/sw/file/Code_of_Ethics.pdf">http://www.telekom.hu/static-tr/sw/file/Code_of_Ethics.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf">https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf">https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf</a>		Occupational health and safety Human rights, equal opportunities Regulatory compliance		
410-1	Security personnel trained in human rights policies or procedures		<a href="http://www.telekom.hu/static-tr/sw/file/Code_of_Ethics.pdf">http://www.telekom.hu/static-tr/sw/file/Code_of_Ethics.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf">https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf">https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf</a>	Security personnel employed by the company also participated in the compulsory human rights e-Training of all Magyar Telekom Group employees in 2018. The training became an element of the compulsory employee training portfolio as of 2018. As partners of Magyar Telekom they are too obliged to thoroughly comprehend and comply with the contents of Magyar Telekom Group Code of Business Conduct and Ethics and the code of Human Rights and Social Principles.	Occupational health and safety Human rights, equal opportunities Regulatory compliance		
GRI 411: Rights of Indigenous Peoples 2016							
103 1-2-3	Management Approach			In Hungary there is no adequate denotation of the group 'Indigenous Peoples'.			
411-1	Incidents of violations involving rights of indigenous peoples			In Hungary there is no adequate denotation of the group 'Indigenous Peoples'.			

DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERIALITY TOPICS	SASB CODE	SDG TARGET
GRI 412: Human Rights Assessment 2016							
103 1–2–3	Management Approach	Diversity and Equal Opportunities (30) Stakeholders - Suppliers (43)	<a href="https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf">https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf">https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Telekom_Equal_opportunities_plan.pdf">https://www.telekom.hu/static-tr/sw/file/Telekom_Equal_opportunities_plan.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Telekom_Group_policy_on_employee_relations.pdf">https://www.telekom.hu/static-tr/sw/file/Telekom_Group_policy_on_employee_relations.pdf</a>		Sustainability in the supplier chain Supplier relations Regulatory compliance Corporate compliance Human rights, equal opportunities		
412–1	Operations that have been subject to human rights reviews or impact assessments	Diversity and Equal Opportunities (30) Stakeholders - Suppliers (43)	<a href="https://www.telekom.hu/static-tr/sw/file/Telekom_Equal_opportunities_plan.pdf">https://www.telekom.hu/static-tr/sw/file/Telekom_Equal_opportunities_plan.pdf</a>	As a member of Deutsche Telekom Group, Magyar Telekom Group fulfills its obligation to provide an annual Human Rights & Social Performance Report confirming its observance of the principles of the Code of Human Rights and Social Principles. Following the practice Magyar Telekom Group has declared its full conformity with the ten basic principles of Deutsche Telekom's Code of Human Rights and Social Principles for the year 2022 relevant to all its Hungarian operations.	Sustainability in the supplier chain Supplier relations Regulatory compliance Corporate compliance Human rights, equal opportunities		
412–2	Employee training on human rights policies or procedures			As a tribute to the 70th anniversary of the Universal Declaration of Human Rights and in compliance with the Code of Human Rights and Social Principles renewed in 2017, all employees of Magyar Telekom Plc. and T-Systems together with their external workforce involved in brand representation participated in a compulsory human rights e-Learning training in 2018. The online training points to relevant human rights issues, regulations, complaint handling and whistleblowing options that might come up within the employment, sourcing, operational and distributional processes of the company group. The e-Learning material has become part of the compulsory employee e-Learning course portfolio of the company as of 2018 and remained to be a mandatory course to all new entrants in 2022 as well..	Involvement of our employees Regulatory compliance Corporate compliance Human rights, equal opportunities		
412–3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Stakeholders - Suppliers (43)	<a href="https://beszerzes.telekom.hu/beszerzes/portal/objects-beszerzes/doc/szallitoi_mukodesi_kodex_ENG.pdf">https://beszerzes.telekom.hu/beszerzes/portal/objects-beszerzes/doc/szallitoi_mukodesi_kodex_ENG.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf">https://www.telekom.hu/static-tr/sw/file/Code_of_conduct.pdf</a> <a href="https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf">https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-socialprinciples-eng.pdf</a>	The warranty statement is a compulsory element of the suppliers contracts (100%). Both the suppliers and sponsorship contract sample includes the relevant elements for the declaration of respecting of human rights, and these elements are also part of the Suppliers Code of Conduct.	Sustainability in the supplier chain Supplier relations Regulatory compliance Corporate compliance Human rights, equal opportunities		
GRI 413: Local Communities 2016							
103 1–2–3	Management Approach	Stakeholders (40)					
413–1	Operations with local community engagement, impact assessments, and development programs	Stakeholders - Local communities (50)					
413–2	Operations with significant actual and potential negative impacts on local communities			In some cases of network development processes the physical construction of the network might cause temporary inconvenience to residents.		TC-TL-520a.2	 
GRI 414: Supplier Social Assessment 2016							
103 1–2–3	Management Approach	Stakeholders - Suppliers (43)			Sustainability in the supplier chain Supplier relations		
414–1	New suppliers that were screened using social criteria	Stakeholders - Suppliers (43)			Sustainability in the supplier chain Supplier relations		  
414–2	Negative social impacts in the supply chain and actions taken	Stakeholders - Suppliers (43)		Magyar Telekom has not terminated any contracts with any of its suppliers with reference to negative environmental impacts in 2022.	Sustainability in the supplier chain Supplier relations		  

DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERI-ALITY TOPICS	SASB CODE	SDG TARGET
GRI 415: Public Policy 2016							
103 1–2–3	Management Approach			<p>Magyar Telekom Group is involved in shaping public politics indirectly, through its representation organizations, in such a way that the representation organizations, in compliance with the effective regulation, are given the opportunity to comment draft laws and industry-specific strategies. The ministries and authorities supervising the industry pass the relevant regulations to the representation organizations, which synthesize the opinions received from the member companies and submit a summary to the relevant ministries. Such regulation commenting procedures are implemented most of all through the Telecommunication Reconciliation Council (HÉT); in some cases the Scientific Association for Infocommunications (HTE); the Joint Venture Association, the American Chamber of Commerce (AmCham), the German-Hungarian Chamber of Industry and Trade, the Association of IT Enterprises, the Communication Interest Conciliation Council.</p> <p>HÉT is the dedicated consultation partner of the telecommunication industry in respect of the Digital Success Program (DJP) – the former Digital National Development Program (DNFP) – launched as a result of the InternetKon national consultation that determined the future of the domestic internet market. During the planning and implementation of the government decree, issued to ensure the implementation of the DJP, the HÉT represents the standpoint of the industry.</p>	Corporate compliance Regulatory compliance		
415–1	Political contributions		<p><a href="https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf">https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf</a></p> <p><a href="https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance">https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance</a></p> <p><a href="https://www.telekom.hu/about_us/about_magyar_telekom/principles">https://www.telekom.hu/about_us/about_magyar_telekom/principles</a></p>	The Magyar Telekom Group is a member of domestic and international industry industry advocacy organizations, which provides it with the opportunity to share its views on strategy issues with market participants, government institutions and regulatory organizations, which fully complies with the requirements of the detailed rules of the Magyar Telekom Code of Conduct [2.10].	Corporate compliance Regulatory compliance		
GRI 416: Customer Health and Safety 2016							
103 1–2–3	Management Approach	Stakeholders - Customers (45)	<p><a href="http://www.telekom.hu/about_us/society_and_environment/society/health_and_safety">http://www.telekom.hu/about_us/society_and_environment/society/health_and_safety</a></p> <p><a href="https://www.telekom.hu/about_us/society_and_environment/society/protection_of_our_children">https://www.telekom.hu/about_us/society_and_environment/society/protection_of_our_children</a></p>				
416–1	Assessment of the health and safety impacts of product and service categories			Magyar Telekom did not identify such impacts.	Safe use of mobile phones, electromagnetic fields Customer satisfaction Regulatory compliance		
416–2	Incidents of non-compliance concerning the health and safety impacts of products and services			The number of health and safety incidents regarding products and services, involving disorderly operating equipment or the breach of internal policies were as follows: penalty or fine due to disorderly operation of equipment: 0 warning due to disorderly operation of equipment: 0 internal warning due to disorderly operation of equipment: 0	Safe use of mobile phones, electromagnetic fields Customer satisfaction Regulatory compliance		
GRI 417: Marketing and Labeling 2016							
103 1–2–3	Management Approach	Our Approach - Sustainability Strategy (5) Climate and Environment Protection (9) Dititalization (21) Stakeholders (40)	<p><a href="http://www.telekom.hu/lakossagi/english">http://www.telekom.hu/lakossagi/english</a></p> <p><a href="http://www.telekom.hu/lakossagi/english/plans/mobile">http://www.telekom.hu/lakossagi/english/plans/mobile</a></p> <p><a href="https://www.telekom.hu/lakossagi/english/plans/phonei">https://www.telekom.hu/lakossagi/english/plans/phonei</a></p> <p><a href="https://www.telekom.hu/uzleti/main">https://www.telekom.hu/uzleti/main</a></p> <p><a href="http://www.t-systems.hu">http://www.t-systems.hu</a></p> <p><a href="http://www.kitchenbudapest.hu/hu/kibu/projects/">http://www.kitchenbudapest.hu/hu/kibu/projects/</a></p> <p><a href="http://www.kalasnet.hu/">http://www.kalasnet.hu/</a> (only in Hungarian)</p> <p><a href="http://www.telekom.mk/en/?z=222">http://www.telekom.mk/en/?z=222</a></p>	<p>Magyar Telekom Group is making ongoing efforts to simplify its propositions as much as possible and to make them available to the widest possible scope of customers. We offer detailed information about the services and tariff packages of Magyar Telekom Plc.'s business units, and information about the services of our most important member companies on the listed websites. Customers can inquire about Telekom tariff packages and services or even request modifications 24 hours a day through the consumer customer service call center, which can be called toll free from Telekom's Hungarian mobile network at 1414 or the 1777 (Domino pre-paid center) number. We have made Telekom website more user-friendly, among others by highlighting search keywords and developing the webshop service to enable quick and simple purchase. The services are available on the following website: <a href="http://www.telekom.hu/lakossagi/szolgalatasok/mobil">http://www.telekom.hu/lakossagi/szolgalatasok/mobil</a> . The integrated servicing of T-Systems customers is provided through the 1400 telephone number and the TS_ugyfelkapcsolat@t-systems.hu e-mail address.</p> <p>Magyar Telekom considers it as high priority to communicate its advertisements to the existing and prospective consumers in compliance with the relevant regulations. We take all measures necessary to ensure that our advertisements deliver our proposals accurately and clearly, excluding any deception. In view of the above, compliance with the consumer protection and GVH (Competition Office) guidelines, and checking regulatory compliance are important requirements of the work processes of producing advertisements is a crucial part of our advertising operations. We convey our proposals to everyone by using the greatest number of communication tools possible and with maximum exploitation of the possibilities offered by the given media. In this way we allow our audience to receive thorough information to be able to make carefully contemplated and responsible decisions</p> <p>In connection with the changed life situations due to the COVID epidemic, digitalization has received more emphasis in everyday life: working from home, online learning, online administration, and contact with the digital space. We also tried to emphasize this in our communication, campaigns and advertisements and helped our clients.</p>	Customer satisfaction Corporate compliance Environmental targets, costs and compliance Innovation for sustainability ICT for sustainability		
417–1	Requirements for product and service information and labeling	Climate and Environment Protection (9) Stakeholders (40)			Corporate compliance Environmental targets, costs and compliance		
417–2	Incidents of non-compliance concerning product and service information and labeling			The Company did not identify such incidents.	Corporate compliance Environmental targets, costs and compliance	TC-TL-220a.3.	



DISCLOSURE NUMBER	DISCLOSURE TITLE	CHAPTER IN SUSTAINABILITY REPORT 2022 (PAGE NUMBER)	URL	DIRECT ANSWER	RELATED MATERI-ALITY TOPICS	SASB CODE	SDG TARGET
417–3	Incidents of non-compliance concerning marketing communications			The Hungarian Competition Authority (GVH) did not take any legal action against Magyar Telekom in 2022 for breaching the rules prohibiting unfair commercial practices against consumers.	Corporate compliance Environmental targets, costs and compliance	TC-TL-520a.1	
GRI 418: Customer Privacy 2016							
103 1–2–3	Management Approach	Stakeholders - Data Protection (51)	<a href="https://www.telekom.hu/rolunk/adatvedelem">https://www.telekom.hu/rolunk/adatvedelem</a>		Data protection		
418–1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Stakeholders - Data Protection (51)		2022-ben is érkeztek a Nemzeti Adatvédelmi és Információszabadság Hatóságtól, illetve közvetlenül az ügyfelektől is megkeresések, panaszok, amelyeket a Magyar Telekom minden esetben kivizsgált, és a vizsgálat eredményéről tájékoztatta a panaszos ügyfelet, illetve a Nemzeti Adatvédelmi és Információszabadság Hatóságot. A panaszok kivizsgálásához kapcsolódóan az érintett folyamatainkat a panaszok okának feltárását követően felülvizsgáljuk, és amennyiben szükséges, megfelelően módosítjuk, illetve tovább fejlesztjük. 2022-ben két, személyes adatok kezelésével kapcsolatos adatvédelmi hatósági vizsgálat és egy hatósági eljárás indult, és egyik 2022-ben zárult eljárás sem járt bírság kiszabásával.  A Magyar Telekom rendelkezik ISO 27001 Információbiztonság Irányítási rendszerrel	Data protection	TC-TL-220a.1 TC-TL-230a.1 TC-TL-230a.2	
GRI 419: Socioeconomic Compliance 2016							
103 1–2–3	Management Approach		<a href="https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance">https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance</a>  <a href="https://beszerzes.telekom.hu/beszerzes/portal_en?appid=beszerzes&amp;page=english/main.vm">https://beszerzes.telekom.hu/beszerzes/portal_en?appid=beszerzes&amp;page=english/main.vm</a>	The Management and Board of Magyar Telekom Group (hereinafter “Magyar Telekom” or “Group”) are unanimous in their commitment that the Group will conduct all business activities in accordance with the highest legal and ethical standards. In support of this commitment the Magyar Telekom Corporate Compliance Program has been developed to create an internal culture where ‘Respect and Integrity’ is one of the most crucial values. The Compliance Program is enacted at all members companies of the Group where Magyar Telekom has effective control. The Compliance Program applies to all bodies, organizations, directors, officers and employees of the Magyar Telekom Group, as well as to consultants, agents, representatives, and all other persons or bodies who carry out work on behalf of any company within the Group. Additionally, we expect our business partners, suppliers and customers to aid us in this effort by acting in a similarly ethical manner. As such, certain aspects of the Compliance Program, apply not just to Magyar Telekom Group employees, but also to third parties with whom we do business. The Compliance Program has been designed to ensure that the Group conducts its business to the highest standards of awareness, transparency, accountability, commitment, and adherence to applicable laws and regulations. To do so requires the implementation of policies and procedures that address potential compliance risk areas together with identifiable mechanisms for reporting, investigating, monitoring, and correcting cases of suspected or actual non-compliance. The elements of Compliance Program is continuously tailored to the changes in the business sector, location of operation, business circumstances, culture and risks, international best practices. The Compliance Program is reflected in the Code of Conduct which is accepted internally by all employees, and by all suppliers through Magyar Telekom Procurement Intranet site. The Group Compliance Officer is responsible for operation and monitoring the Compliance Program.	Corporate compliance Regulatory compliance Addressing legal and ethical aspects of content service provision		
419–1	Non-compliance with laws and regulations in the social and economic area			Magyar Telekom uses its best efforts to fulfill its obligations in accordance with the effective laws. In order to prevent potential authority penalties and sanctions the Company always strives to ensure Magyar Telekom’s compliance with the effective laws and manage conflicts – besides harmonizing processes and IT systems with the amendment of laws - with continuous personal consultation, agreements concluded with the authorities and retroactive settlement plans set out in undertakings, made in the form of declarations. In 2022 the National Media and Info-Communications Authority (NMHH) conducted several individual complaint and general/overall market supervision proceedings against the Company. Within the frame of general market supervision proceedings the authority imposed 21,1 million HUF. The District Offices of the Government Offices, as the authorities responsible for consumer protection supervision, also conducted several investigations against Magyar Telekom in 2022, with fines totalling 4.6 million HUF. Our clients have used the services of alternative dispute resolution fora, in relation to which there were a total of 66 cases handled with the assistance of the Media and Communications Commissioner, and 337 cases in which dispute resolution plenums provided assistance.	Corporate compliance Regulatory compliance Addressing legal and ethical aspects of content service provision		

The Magyar Telekom has prepared Sustainability report in 2022 in accordance with the GRI Standards (Comprehensive) and in accordance of the SASB (Sustainable Accounting Standards Board) requirements. For each indicator, we have indicated which chapter(s) provide information

SASB indicators:

TC-TL-130	Environmental Footprint of Operations
TC-TL-220	Data Privacy
TC-TL-230	Data Security
TC-TL-440	Product End-of-life Management
TC-TL-520	Competitive Behavior & Open Internet
TC-TL-550a.1	Managing Systemic Risks from
TC-TL-550a.2	Technology Disruptions

Activity metric:

TC-TL-000.A	Number of wireless subscribers	5 425 433
TC-TL-000.B	Number of wireline subscribers	3 857 733
TC-TL-000.C	Number of broadband subscribers	1 298 825
TC-TL-000.D	Network traffic (petabytes)	Our advanced network carries more than 16 petabytes of traffic on an average business day in 2022. Magyar Telekom Plc. is not able to provide further breakdown of this data as requested, as it is proprietary and confidential.

Unlike in previous years, the GRI Content Index does not include sector-specific indicators, as new sector-specific indicators for the telecommunications industry are not available.