

## **GRI CONTENT INDEX**

GRI Standards used:

GRI 101: Foundation 2016,

GRI 102: General Disclosures 2016,

GRI 103: Management Approach 2016,

GRI 200: Economic 2016,

GRI 300: Environmental 2016,

GRI 400: Social 2016;

GRI 303: Water and effluents 2018;

GRI 403: Occupational Health and Safety 2018

Disclosure Number	Disclosure Title	Chapter in Sustainability Report 2019	Page	Website	Dircet answer	Omission	External Assurance
GRI 102: G	ENERAL DISCLOSURE	S 2016					
1. ORGANI	ZATIONAL PROFILE						
102-1	Name of the organization				The registered company name of Magyar Telekom is Magyar Telekom Telecommunications Public Limited Company, and its abbreviated name is Magyar Telekom Plc.		<b>*</b>
102-2	Activities, brands, products and services	,		http://www.telekom.hu/lakossagi/english/plans http://www.telekom.hu/about_us/about_magyar_telekom http://www.telekom.hu/uzleti/main http://www.telekom.hu/about_us/about_magyar_telekom/magyar_telekom_ group	The activities of Magyar Telekom Group cover three main business areas:  - fixed-line and mobile telecommunication services to residential customers (under the Telekom brand),  - services to small- and medium-sized businesses (under the T-Systems brand)¹,  - and services to large businesses (under the T-Systems brand).  Magyar Telekom's employer and HR activities, business and investor relations, legal and corporate affairs, sustainability and corporate social responsibility, non-core business development, technical and network development activities also go under the corporate Telekom brand.  Magyar Telekom does not sell debated or prohibited products.		~
102-3	Location of headquarters				The headquarters of the Group are located in Budapest (IX., Könyves Kálmán krt. 36.).		~
102-4	Location of operations				The Group's area of operation: Hungary, Macedonia, Bulgaria and Romania.		<b>~</b>
102-5	Ownership and legal form			http://www.telekom.hu/about_us/investor_relations/magyar_telekom_shares /ownership_structure	Shareholders       Ownership %       ✓         Deutsche Telekom Europe B.V.       59,21%         Other foreign institutions       19,51%         Domestic individuals       9,57%         Domestic institutions       4,44%         Other       7,27%         Total       100,00%         Deutsche Telekom Europe B.V. (formerly called CMobil B.V.) is 100%-os owned by Deutsche Telekom Europe Holding B.V., whose 100%-os 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 59,21% indirect ownership and voting rights in Magyar Telekom Plc.		•
102-6	Markets served			http://www.telekom.hu/about_us/about_magyar_telekom/magyar_telekom_group http://www.telekom.hu/lakossagi/english/plans http://www.telekom.hu/lakossagi/english http://www.telekom.hu/uzleti/main	The Magyar Telekom Group's member companies operating in Hungary are managing content, media and other, non-access services provided under various brands. The Group's international member companies are operating in the markets of the South-East European region as integrated and alternative telecommunications service providers.		<b>~</b>
102-7	Scale of the organization				Number of employees of Magyar Telekom Group: 8,246 persons (as of December 31, 2019)		~
102-8	Information on employees and other workers	Diversity and inclusion		https://www.telekom.hu/about_us/career/telekom_internship_program	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. On December 31, 2019 Magyar Telekom had 234 interns, and T-Systems had 80 interns. Throughout our internship program these 314 interns were provided with opportunities to gain real workforce experience in various areas of our operations. The diverse team of our 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 scolarly areas, we are eager to find out more abut 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.		~
102-9	Supply chain	Stakeholders - Suppliers		http://www.telekom.hu/about_us/about_magyar_telekom/procurement https://beszerzes.telekom.hu/beszerzes/portal_en?appid=beszerzes&page=english/main.vm	The total number of suppliers that Magyar Telekom Plc. contacted with procurement orders in 2019 was 1310. The table at GRI 102-10 lists the types of suppliert by procurement areas. If suppliers are involved in the procurement processess of multiple areas than the above table lists them in all areas concerned. Therefore the sum of the above numbers does not reflect to the total number of suppliers engeged in our corporate procurement processes. The proportion of local suppliers 91,95%. There is a corporate intranet site providing internal information for employees on the Procurement and Logistics Directorate's areas of concern, representatives and the related rules and regulations.		~

<sup>(1)</sup> With effect from January 01, 2020, the integrated Customer Facing Unit will serve the small and medium business segment along with the residential segment.

<sup>(1)</sup> The Management Committee, ceased to exist, as a decision-making body of the Company, with effect from January 01, 2020. The responsibilities and authorities of the Management Committee were reallocated partly to the Board of Directors, partly among the CEO and the other Chief Officers.

Disclosure	Disclosure	Chapter in Sustainability		w. c.			External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assurance
102-28	Evaluating the highest governance body's performance				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 overachieving 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 t		•
102-29	Identifying and managing economic, environmental, and social impacts	Corporate governance					~
102-30	Effectiveness of risk management processes	Corporate governance			The potential risk segments concerning the operations of Magyar Telekom are being revisioned on a quarterly basis. All of our subsidiaries, business segments and other corporate bodies are obliged to identify and report on the potential risks of their operations on a quarterly basis. The results of assessment and evaluation of these threats are being forwarded to the Board of Directors and the Audit Committee. In order to enable the immediate release of threats that might effect shareholder decisions we have introduced a supplementary element to the risk management process. Our quarterly risk reporting system has been supplemented by a continuous risk reporting obligation. Thus all subsidiaries and business segments of the company are obliged to immediately report on all relevant, news, facts, changes and threats. All transmitted information is being evaluated by the Risk management area, and in case of identifying new and relevant information and/or threat, the representative of the area immediately reports them to the Chief Financial Officer. There is an internal regulation in operation that secures and defines the levels of responsibility of employees in relation to risk management.		
102-31	Review of economic, environmental, and social topics	Corporate governance					*
102-32	Highest governance body's role in sustainability reporting						<b>~</b>
102-33	Communicating critical concerns	Corporate governance					<b>~</b>
102-34	Nature and total number of critical concerns	Stakeholders					<b>~</b>
102-35	Remuneration policies	Diversity and inclusion		http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation https://www.telekom.hu/static-tr/sw/file/IFRS_Group_20191231_AGM.pdf https://www.telekom.hu/static-tr/sw/file/2020AGM_Corporate-Governance-Report-2019.pdf	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 overachieving 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 t		~

Disclosure Number	Disclosure Title	Chapter in Sustainability Report 2019	Page	Website	Dircet answer	Omission	External Assurance
102-36	Process for determining remuneration		9-5	http://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation https://www.telekom.hu/static-tr/sw/file/20190409_Remuneration_Guidelines_ENG.pdf https://www.telekom.hu/static-tr/sw/file/20200101_MT_RNC_RoP_ENG.pdf https://www.telekom.hu/static-tr/sw/file/20200101_MT_BoD_RoP_ENG.pdf	Members of the Committee may request presence of external invitees (e.g. experts) who can attend parts or the entire meeting related to the agenda item.		<b>*</b>
102-37	Stakeholders' involvement in remuneration			http://www.telekom.hu/static-tr/sw/file/8_javadalmazas_19March2014 _eng.pdf http://www.telekom.hu/static-tr/sw/file/kozgyulesi_hatarozatok_2014AGM_ 14April2014_eng.pdf https://www.telekom.hu/static-tr/sw/file/AGM_submissions_18March2019_ eng.pdf https://www.telekom.hu/static-tr/sw/file/20190409-AGM-resolutions- kozzetetelre.pdf	The Annual General Meeting, held on April 11, 2014, determined the remuneration of the members of the Board of Directors, the Supervisory Board and the Audit Committee. The Annual General Meeting, held on April 9, 2019 approved the amendments of the Remuneration Guidelines.		~
102-38	Annual total compensation ratio			https://www.telekom.hu/static-tr/sw/file/2020AGM_Corporate-Governance-Report-2019.pdf		Partial discolsure	~
102-39	Percentage increase in annual total compensation ratio			https://www.telekom.hu/static-tr/sw/file/2020AGM_Corporate-Governance-Report-2019.pdf	Information disclosed on remuneration of Board of Directors, Supervisory Board, Audit Committee and Management is available in Corporate Governance and Management Report (prepared on the basis of the provisions of the Civil Code and the Corporate Governance Recommendations of the Budapest Stock Exchange (BSE)).		~
5. STAKEH	OLDER ENGAGEMENT	•					
102-40	List of stakeholder groups	Stakeholders					~
"102-41	Collective bargaining agreements				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 90.2%.		<b>~</b>
102-42	Identifying and selecting stakeholders	Stakeholders					<b>~</b>
102-43	Approach to stakeholder engagement	Stakeholders					~
102-44	Key topics and concerns raised	Stakeholders					~
6. REPORT	TING PRACTICE						
102-45	Entities included in the consolidated financial statements				The report covers Hungary and Macedonia and all activities of the Group are included. Telekom uses its best efforts to ensure completeness of the report therefore includes all member companies that are of key importance from a sustainability point of view. The data disclosed the report are comparable to the changes of the composition of the Group which is supported by the table in the direct answers to the 102-10 indicator.		<b>*</b>
102-46	Defining report content and topic Boundaries	Stakeholders - Materiality					<b>~</b>
102-47	List of material topics	Stakeholders - Materiality					~
102-48	Restatements of information				The report does not contain any restatements.		~
102-49	Changes in reporting				There is no any significant change in reporting.		
102-50	Reporting period				All data and information presented in this current report references the year 2019.		_
102-51	Date of most recent report			https://www.telekom.hu/static-tr/sw/file/sustainability-report-2017.pdf	The most recent report was published in 2019 covering the year 2018.		✓.
102-52	Reporting cycle			https://www.telekom.hu/about_us/society_and_environment/sustainability_reports/?token=1468592762386	Magyar Telekom releases its sustainability report on an annual basis.		~
102-53	Contact point for questions regarding the report				Should you have any questions or queries on the report, please do not hesitate to write to the following e-mail address: fenntarthatosag@telekom.hu		<b>~</b>
102-54	Claims of reporting in accordance with the GRI Standards				This report has been prepared in accordance with the GRI Standards: Comprehensive option		<b>~</b>
102-55	GRI content index	GRI content index					

Disclosure	Disclosure Title	Chapter in Sustainability	Daga	Wahaita	Direct anguar	Ominoi	External
Number		Report 2019	Page	Website	Dircet answer	Omissio	on Assuranc
. <b>REPOR</b> 1 02-56	FING PRACTICE  External assurance	Assurance statement			In order to ensure credibility and transparency, the Company continued to rely upon the support of an experienced and re	enceted external independent	
02-00	External assurance	Assurance statement			third party. The purpose of the assurance procedure that they conducted is to determine the compliance, authenticity, cor		<b>~</b>
					integrity, justifiability and verifiability of the Sustainability Report. The report has been audited by PricewaterhouseCooper.		
					the information contained therein to be reliable. The assurance process has been designed and conducted in accordance		
					defined by the International Federation of Accountants. The respective limited assurance engagement report can be foun		
					chapter. Data and information audited are indicated by a ✓ symbol in the report and in the GRI content index.	in the Assurance statement	
					Sources of the data included in the report:		
					- The business data are from the Group's year-2019 Annual Report and Quarterly Reports and data collection conducted	within the Group.	
					- The data of social nature are collected within the Group partly with the support of an online reporting tool, while the rest		
					organizational units.	,	
					- The environmental protection data are partly from a process-wise transparent, online data provision system, as well as da	ta collection conducted within the	
					Group.		
3RI 200: E	CONOMIC STANDAR	DS 2016					
3RI 201: E	CONOMIC PERFORM	IANCE 2016					
03-1-2-3	Management approach	Letter from the CEO Our Approach					~
)1-1	Direct economic value				CREATING VALUE FOR OUR STAKEHOLDERS	2010	<b>~</b>
	generated and distributed					2019 2019	
					Produces economic value Group Group Group Group Group Hungary Mace	lonia Romania Bulgaria	
					Revenues (total revenue + 656.342 602.729 611.194 657.692 666.743 602.360 57.70 share from the after-tax HUF million HUF milli		
					Stakeholder Distributed economic value		
					Supplies Operating costs (total 377 409 311 72 345 245 374 470 333 893 301 647 28 17 revenue-related payments HUF million HUF		
					Employees Employee wages and benefits 95 160 83 327 80 240 82 968 80 192 73 615 5 739 (employee related costs) HUF million HUF		
					Investors Payment to capital investors 28 176 42 448 47 708 43 852 50 194 49 899 281 dividend pay + net other dependence of the poperating costs)    Description of the payment to capital investors	-4 18 HUF million HUF million	
					State Payments to the state budget 46 666 27 128 48 461 45 979 46 639 45 454 1 111 (profit tax + crisis tax + telecom HUF million HUF mill		
					Communities Community investments 348 444 363 703 2 034 1 958 75 (donations, institutional HUF million	n.a n.a	
					Overall Retailed earnings (after-tax 145.331 159.066 122.353 135.910 155.825 131.745 22.40 stakeholders profit + depreciation-dividend HUF million HUF		
1-2	Financial implications and other risks and opportunition due to climate change	11					~
1-3	Defined benefit plan obligations and other retirement plans				As of 2019 the employer contribution the private healthcare, mutual funds and voluntary pension ceased, while we remain healthcare, pension and unemployment support systems. Meanwhile we deduct voluntary pension and healthcare membership fee may be a fixed amount or a percentage, which is to be sta	ership fees and transfer them to	<b>~</b>
1-4	Financial assistance				CURATIVE FAMILIAN AUROPAT FROM ATTE		~
	received from government				SUBSTANTIAL FINANCIAL SUPPORT FROM STATE  2015 2016 2017 2018	2019	
					tax credit utilization 5493 HUF million 1914 HUF million 3208 HUF million 2484 HUF million	nillion 3 862 HUF million	
					film- and sport subsidies 664 HUF million 395 HUF million 546 HUF million 500 HUF m tax benefit on wage cost of softwer developers 0 0 0 0	llion 645 HUF million 0	
					tax impact of tax base decreasing item on donations 300 HUF thousand 114 HUF thousand 189 HUF thousand 0	559 HUF thousand	
					tax impact of tax base decreasing item on R&D 0 0 0 0	0	

Disclosure	Disclosure	Chapter in Sustainability	Dans	Wahaita	Direct annuar	Ominai	External
Number	Title  IARKET PRESENCE 2	Report 2019	Page	Website	Dircet answer	Omission	Assurance
GRI 202: IV	IARRE I PRESENCE 2	U10					
103-1-2-3	Management approach	Our Approach Diversity and inclusion Stakeholders					•
202-1	Ratios of standard entry lew wage by gender compared to local minimum wage	el			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 emlpoyees. The lowest base wage as stated in the Collective Agreement is 120% of the minimum wage.		•
202-2	Proportion of senior management hired from the local community	Diversity and inclusion					<b>~</b>
GRI 203: IN	NDIRECT ECONOMIC	IMPACTS 2016					
103 1-2-3-	Management Approach	Our Approach – Sustainability strategy					~
203-1	Infrastructure investments and services supported	Digitally enabled sustainability Stakeholders					<b>~</b>
203-2	Significant indirect economic impacts	Digitally enabled sustainability Stakeholders					<b>~</b>
GRI 204: P	ROCUREMENT PRAC	TICES 2016					
103 1-2-3-	Management Approach	Stakeholders - Suppliers		https://beszerzes.telekom.hu/beszerzes/portal_en?appid=beszerzes&page =english/main.vm			~
204-1	Proportion of spending on local suppliers	Stakeholders - Suppliers					<b>~</b>
GRI 205: A	NTI-CORRUPTION 20	16					
103 1-2-3-	Management Approach			http://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf http://www.telekom.hu/static-tr/sw/file/Anti_corruption_clause_en.pdf http://www.telekom.hu/static-tr/sw/file/corporate_governance_declarations_ ICS_eng.pdf	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 is 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. 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 anti-corruption regulations or the guiding principles of the Compliance Program.		*
205-1	Operations assessed for risk related to corruption	KS		https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance	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 fullfillment of these measures.		~
205-2	Communication and trainin about anti-corruption policie and procedures	=		https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance	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%, all regions, Magyar Telekom: 6 persons (Management Committee) 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. There was no external communication on this topic. 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:: 422 persons, in 2019 97% of new entrants completed the course successfully."	,	*
205-3	Confirmed incidents of corruption and actions take	n			Number of confirmed incidents: 0		✓

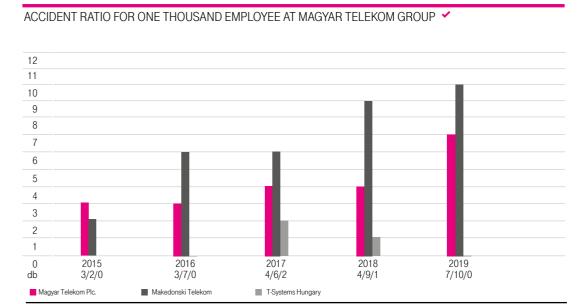
Disclosure	Disclosure	Chapter in Sustainability					External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assuranc
GRI 206: A	NTI-COMPETITIVE BE	HAVIOR 2016					
03 1-2-3-	Management Approach			http://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance	Magyar Telekom uses 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 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 continuous personal consultation, agreements concluded with the authorities and retroactive settlement plans set out in undertakings, made in the form of declarations.  The antitrust policy covers: price fixing, bid rigging, market allocation scheme. The antitrust policy applies to: employees, contractors, suppliers. The company publicly report on breaches of its antitrust policy. Measures are taken to promote and ensure antitrust compliance.		~
06-1	Legal actions for anti- competitive behavior, anti-trust, and monopoly practices				In 2019 no fines were imposed due to anti-competitive conduct or violation of anti-trust statutes. Vj-56/2017 was closed without sanction upon Magyar Telekom's commitments.		•
GRI 300: E	NVIRONMENTAL STA	NDARDS 2016					
GRI 301: M	IATERIALS 2016						
103 1-2-3	Management Approach	Our Approach – Sustainability strategy Climate protection		http://www.telekom.hu/about_us/society_and_environment http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_ policy.pdf http://www.telekom.hu/about_us/society_and_environment/environment/ management_systems	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.		~
301-1	Materials used by weight or volume	Our Approach – Sustainability strategy Climate protection		http://www.telekom.hu/about_us/society_and_environment http://www.telekom.hu/about_us/society_and_environment/environment/ equipment_management http://www.t-systems.hu/a-t-systemsrol/iranyelveink/gyartoi-tajekoztato (only HU http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_ policy.pdf			•
301-2	Recycled input materials used			http://www.telekom.hu/about_us/society_and_environment https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek (only HU)	Recycled paper used in 2019: 128 980 kg (bills, office use).		~
301-3	Reclaimed products and their packaging materials	Climate protection		https://beszerzes.telekom.hu/beszerzes/portal_en?appid=beszerzes&page=english/vendors/information/main.vm http://www.t-systems.hu/a-t-systemsrol/iranyelveink/gyartoi-tajekoztato (only HU http://www.telekom.hu/about_us/society_and_environment/environment/equipment_management https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek (only HU)	Magyar Telekom Plc.'s intermediary partner for batteries is ReLEM. In 2019 32 kg electronical devices were taken back.		•
GRI 302: E	NERGY 2016						
103 1-2-3	Management Approach	Our Approach – Sustainability strategy Climate protection		http://www.telekom.hu/about_us/society_and_environment http://www.telekom.hu/about_us/about_magyar_telekom/principles/ quality_guarantees http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_ policy.pdf	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.		~
302-1	Energy consumption within the organization	Climate protection					<b>~</b>
302-2	Energy consumption outside of the organization	Climate protection		http://www.telekom.hu/about_us/society_and_environment/environment/equipment_management			<b>~</b>
302-3	Energy intensity	Climate protection					~
302-4	Reduction of energy consumption	Climate protection		http://www.telekom.hu/about_us/society_and_environment			<b>~</b>
302-5	Reductions in energy requirements of products and services	Climate protection					<b>~</b>

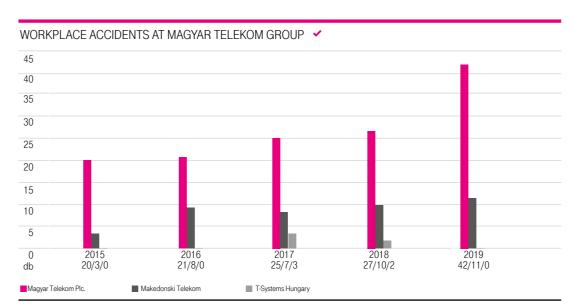
Disclosure	Disclosure	Chapter in Sustainability	D	Wahaita	Direct cooper	a!aa!-	External
Number	Title	Report 2019	Page	Website	Dircet answer On	nission	Assuran
GRI 303: W	VATER AND EFFLUENT	S 2018					
303-1	Interactions with water as a shared resource	Climate protection		http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf	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.		•
303-2	Management of water discharge-related impacts	Climate protection		http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf			•
303-3	Water withdrawal	Climate protection			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.		•
303-4	Water discharge	Climate protection					~
303-5	Water consumption	Climate protection					<b>~</b>
GRI 304: BI	IODIVERSITY 2016						
103 1-2-3	Management Approach	Climate protection		http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees http://www.telekom.hu/about_us/society_and_environment	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.		•
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversit value outside protected area	у		http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf			•
304-2	Significant impacts of activities, products, and services on biodiversity				Our company avoids operations on protected and Natura 2000 areas.		<b>~</b>
304-3	Habitats protected or restore	ed			We do not conduct operations on protected or restored habitats.		~
304-4	IUCN Red List species and national conservation list species with habitats in area affected by operations	s			Our operations do not affect habitats of endangered and/or IUCN Red List species.		•
GRI 305: E	MISSIONS 2016						
103 1-2-3	Management Approach	Our Approach– Sustainability strategy Climate protection		http://www.telekom.hu/about_us/society_and_environment http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_ guarantees http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_ policy.pdf	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.		~
305-1	Direct (Scope 1) GHG emissions	Climate protection					<b>~</b>
305-2	Energy indirect (Scope 2) GHG emissions	Climate protection			All emissions are location based. Electricity consumption is given as market based too.		~
305-3	Other indirect (Scope 3) GHG emissions	Climate protection					~
305-4	GHG emissions intensity	Climate protection			We have conducted the following measurements: Scope 1: g/CO2/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.		~
305-5	Reduction of GHG emission	s Climate protection			The quoted emission data refer to Scope 1 and Scope 2 emissions.		~
305-6	Emissions of ozone-depleting substances (ODS)	g			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.		<b>~</b>
305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emission	Climate protection					<b>*</b>

Disclosure	Disclosure	Chapter in Sustainability	_				External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assurance
	EFFLUENTS AND WAST						
03 1-2-3	Management Approach	Our Approach – Sustainability strategy Climate protection		http://www.telekom.hu/about_us/society_and_environment http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_ guarantees http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_ policy.pdf	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.		<b>~</b>
306-1	Water discharge by quality and destination	Climate protection			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		<b>~</b>
306-2	Waste by type and disposal method	Climate protection					<b>*</b>
306-3	Significant spills				There was no significant leakage or unsupervised output.		<b>~</b>
306-4	Transport of hazardous waste	9			Magyar Telekom does not import or export or manage hazardous waste.		<i>-</i>
306-5	Water bodies affected by water discharges and/or run	off			Our operations do not directly affect water bodies, water discharges and/or freshwater habitat.		<b>~</b>
GRI 307: E	ENVIRONMENTAL COM	PLIANCE 2016					
103 1-2-3	Management Approach	Our Approach – Sustainability strategy Climate protection		http://www.telekom.hu/about_us/society_and_environment http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental _policy.pdf http://www.telekom.hu/about_us/society_and_environment/environment/ management_systems	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.		~
307-1	Non-compliance with environmental laws and regulations	Climate protection					<b>*</b>
GRI 308: S	-	NTAL ASSESSMENT 2016					
103 1-2-3	Management Approach	Stakeholders - Suppliers					<b>~</b>
308-1	New suppliers that were screened using environmental criteria	Stakeholders - Suppliers					<b>~</b>
308-2	Negative environmental impacts in the supply chain and actions taken	Stakeholders – Suppliers					<b>~</b>
GRI 400: S	SOCIAL STANDARDS 20	016					
GRI 401: E	EMPLOYMENT 2016						
103 1-2-3	Management Approach	Diversity and inclusion					~
401-1	New employee hires and						~
	employee turnover				FLUCTUATION AT MAGYAR TELEKOM GROUP   2019 (Plc,/Group)  Total fluctuation 16.47%/115.1%  Termination initiated by 6.81%/6.23% the employee		
					FLUCTUATION AT MAGYAR TELEKOM GROUP IN 2019   Magyar Telekom Group Magyar Telekom Plc. T-Systems Hungary Makedonski Telekom		
					Magyar Telekom Group         Magyar Telekom Plc.         T-Systems Hungary         Makedonski Telekom           Total fluctuation         15.11%         16.47%         17.42%         3.82%		
					Termination initiated by 6.23% 6.81% 6.00% 3.17% the employee		
					AGE GROUPS AND GENDER DISTRIBUTION OF NEW HIRES AT MAGYAR TELEKOM PLC. IN 2019 ✓		
					Age group         19-25         26-30         31-35         36-40         41-45         46-50         51-55         56+         Összesen           Male         159         134         81         60         61         48         18         14         575		
					Female         90         57         38         17         30         15         4         10         261           Total headcount         249         191         119         77         91         63         22         24         836		
					FLUCTUATION AT MAGYAR TELEKOM PLC. IN 2019 ✓		
					Total fluctuation         6.40%         9.50%		

Disclosure	Disclosure	Chapter in Sustainability					External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assurance
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Diversity and inclusion			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 Collective 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.		•
401-3	Parental leave	Diversity and inclusion					~
GRI 402: L	ABOR/MANAGEMENT	RELATIONS 2016					
1103 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 communication is managed both verbally (negotiation) and in writing. The Chief People Officer and the HR Business partner are managing 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, 2019 the Supervisory Board had three employee representatives: Tamás Lichnovszky, Zsoltné Varga and Bujdosó Attila. "		~
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 collective 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 resolutions, aiming at organizational changes without regard to the number of employees concerned.		<b>~</b>
GRI 403: 0	OCCUPATIONAL HEALT	TH AND SAFETY 2018					
403-1	Occupational health and safety management system	Stakeholders - Suppliers		http://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees	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 2018 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.		<b>~</b>
403-2	Hazard identification, risk assessment, and incident investigation				Labor Safety identified threats, as well as reviewed and assessed the risks attached to telecommunications activities and jobs in 2019, too, providing a comprehensive view on the risks posed at any jobs of the company and concerning employees pursuing activities associated with different levels of hazard, as well as the extent of such risk, thus enabling the adoption of targeted and personalized protective measures.		~
403-3	Occupational health service	s			As in previous years, we put extra emphasis on health, the support of different medical checkups in 2019, too. In order for that, we provided our employees family practitioner-type care in Budapest, and different medical checkups across the country in addition to their occupational health assessments. A total of 5387 people (MT: 4118 TSM: 1269) took part in the occupational health assessments. As part of the assessments, ophthalmology examinations took place in 5207 cases (MT: 3771, TSM: 1436). In case of 70% of the examinations, some medical condition (e.g. visual acuity issues, cataract, glaucoma, high blood pressure, diabetes etc.) was diagnosed. A total of 1115 employees (MT: 746, TSM: 369) showed up for the examinations independent of the occupational health assessment in 2019.		•
403-4	Worker participation, consul tation, and communication 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 representatives in both T-Systems and Magyar Telekom. At Telekom 7 employee representatives, and at T-Systems 1 representative serves in the safety committees, depending on the risk category of the respective areas the occupational safety risks - and interests - are weighted. 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.		<b>~</b>
403-5	Worker training on occupa- tional health and safety				All Magyar Telekom employees are required to complete their labor safety training at the time they are hired, and to take the course repeatedly every two years.		<b>~</b>
403-6	Promotion of worker health				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 wel as the MSZ ISO 45001:2018 MEBIR (Occupational Health and Safety Management System) safety standards.		<b>~</b>
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships				The Company elaborates technological processes to avoid electric shock accidents and to ensure the safety of work performed in heights.		<b>~</b>

Disclosure	Disclosure	Chapter in Sustainability					External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assurance
403-8	Workers covered by an occupational health and s afety management system				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.		<b>~</b>
403-9	Work-related injuries						✓





Magyar Telekom Plc.: There were no occupational fatal accidents in 2019. There were 77 registered injuries: 37 cases involved the loss of more than 3 workdays, 5 cases involved the loss of 1 to 3 workdays, 34 cases did not involve loss of workdays and there was 1 case of unsubstantiated accident, i.e. a total of 1202 lost workdays. Distribution of injury types: 60 technical and other type and 12 office injuries 4 injuries occured during team building. Most frequent recorded injuries: 5 cases of dislocations of limbs, 6 cases of electric shock, 8 cases of cut injuries or open wounds, 8 cases of bruises due to animal attack, 24 cases of sprains, 20 cases of bruises, 5 cases of other types of accidents.

There were no recorded injuries is T-Systems in 2019.

Makedonski Telekom: 0 fatal accidents, 11 accidents at work subject to reporting obligations, i.e. a total of 133 lost workdays. Magyar Telekom does not keep records on injuries of its suppliers.

Disclosure	Disclosure	Chapter in Sustainability					External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assurance

## **GRI 404: TRAINING AND EDUCATION 2016**

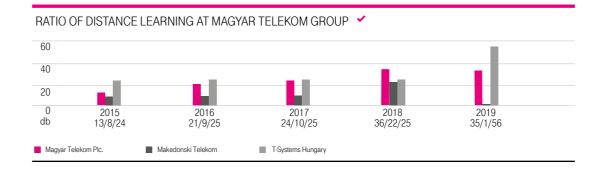
103 1-2-3 Management Approach

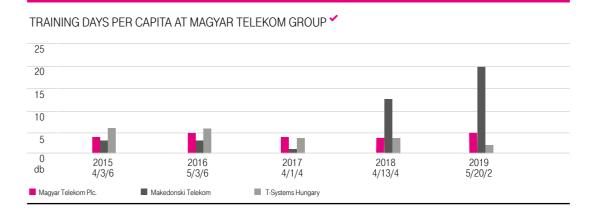
404-1 Average hours of training per

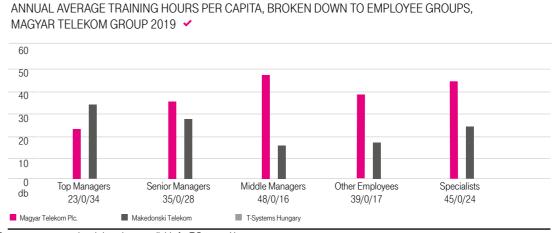
Average hours of training per year per employee

Telekom Group is a key organization of Hungary's ICT sector. In this industry it is imperative to know and apply new trends, research results both at employee and managerial levels. Our training-development strategy, in line with that of Deutsche Telekom, has been established in accordance with predefined business objectives. Upon definition of the training requirements for our business goals we also specify the most suitable training programs for the employee target groups. The Group Learning Synergies are those joint-focused training areas that are specified and made available at group level. At specific times of the year we monitor the success of these programs with a predefined methodology, and if necessary, we fine-tune them to more effectively fulfill our business and individual development objectives. After this trainings we perform satisfaction measurements and - where possible - we measure the ROI, too. A key effectiveness improvement component of our training strategy is the promotion of elearning courses thus we strive to increase the overall proportion of digital training material. In order to support effective work we provide various online and classroom trainings in our training portfolio (e.g. time management, assertivity, conflict management, etc.). As a caring company Magyar Telekom offers activities for employees affected by downsizing within the frame of the outplacement program that supports their reintegration into the labor market.

Magyar Telekom Group lays much emphasis on constant training, development of its employees and supports the use of the acquired knowledge. Magyar







Empoyment category breakdown is not avaliable for T-Systems Hungary.

Disclosure	Disclosure	Chapter in Sustainability	_				External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assurance
404-2	Programs for upgrading employee skills and transition assistance programs	Diversity and inclusion			The company's management has been using its best efforts to devote 1.5% of the personnel expenses to the training and development of managers and employees. Training plans at business unit level define the direction of development activities, professional training courses, skills and cooperation development programs, agile trainings, management development events and conferences of the given year. Coaching is a key management development and culture forming tool at Magyar Telekom both for individuals and groups. Telekom elaborated the corporate mentoring system with the focus on knowledge sharing and self-development. It was also to strengthen self-development that two internationally recognized digital development platforms were introduced in 2019, through which all employees of the company can access more than 19 000 books, 1 200 audio books and 2 000+ course materials in the areas of skills development, leadership development, agile and professional development. They can also freely choose the learning format that best support their development needs from a selection ranging from microlearning solutions to formal university courses providing certified qualifications.  The company also supports its employees in their studies, pursued in the framework of the state education system by concluding study contracts with them, thus providing financial subsidy and some reduction of working hours. In 2019, Magyar Telekom concluded a total of 69 study contracts. Out of them 37 covered school training, the others were related to training courses or agreements containing mutual commitments.  Upon registration the employees involved in downsizing could use the following services: two-day labor market training course in groups, support in active job search, financial support to training and retraining activities to meet labor market requirements, personal psychological and labor law consulting, as well as follow-up activities and monitoring participants' potential placement are also granted.		•
404-3	Percentage of employees receiving regular perfor- mance and career develop ment reviews	·			In 2018 Magyar Telekom has introduced FUTAM, a flexible framework in support of both personal and business success. It is the practical realisation of growth mindset that supports feedback culture. FUTAM is customizable to the relevant targets of personal development and business tartgets both on the level of the organisation and the employee. It provides a framework for employee development tracking and control, based on feedback and cooperation instead of evaluation. In 2019 along the agile transformation of our corporate working culture the new modules of FUTAM are being designed to support our value based feedback culture.		~
GRI 405: D	OIVERSITY AND EQUA	L OPPORTUNITY 2016					
103 1-2-3	Management Approach	Diversity and inclusion		https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-social-principles- eng.pdf https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf https://www.telekom.hu/static-tr/sw/file/Diversity_Policy.pdf			~
405-1	Diversity of governance bodies and employees	Diversity and inclusion					*
405-2	Ratio of basic salary and remuneration of women to men	Diversity and inclusion					~
GRI 406: N	ION-DISCRIMINATION	12016					
103 1-2-3	Management Approach	Diversity and inclusion		https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-social-principles- eng.pdf https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf https://www.telekom.hu/static-tr/sw/file/Diversity_Policy.pdf	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 anonimous employee survey measuring the diversity and inclusion culture of the company was conducted in 2018 january. The results of the survey were used as the basis of the Diversity and Equal Opportunities Plan prepared at the beginning of 2018. "		~
406-1	Incidents of discrimination and corrective actions taken	n			In 2019 there were no complaints issued against the company by the Equal Opportunity Authority for Discriminative Practices (EBH).		~
GRI 407: F	REEDOM OF ASSOCIA	ATION AND COLLECTIVE BA	ARGAINING	32016			
103 1-2-3	Management Approach	Stakeholders – Suppliers		https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-social-principles- eng.pdf https://beszerzes.telekom.hu/beszerzes/portal/objects-beszerzes/doc/ mukodesi_kodex_en.pdf	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 employment-related 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 a		*
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk				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 89.29%.		*

Disclosure	Disclosure	Chapter in Sustainability					External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assuranc
GRI 408: C	HILD LABOR 2016						
03 1-2-3	Management Approach	Stakeholders – Suppliers		https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-social-principles- eng.pdf https://beszerzes.telekom.hu/beszerzes/portal/objects-beszerzes/doc/ mukodesi_kodex_en.pdf	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)	)	<b>~</b>
08-1	Operations and suppliers at significant risk for incidents of child labor	Stakeholders - Suppliers		https://www.telekom.com/en/corporate-responsibility/assume-responsibility/assume-responsibility/supply-chain-management-355304	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.		<b>~</b>
GRI 409: F	ORCED OR COMPULS	ORY LABOR 2016					
03 1-2-3	Management Approach	Stakeholders - Suppliers		https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-social-principles- eng.pdf https://beszerzes.telekom.hu/beszerzes/portal/objects-beszerzes/doc/ mukodesi_kodex_en.pdf	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.		*
109-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Stakeholders - Suppliers		https://www.telekom.com/en/corporate-responsibility/assume-responsibility/assume-responsibility/supply-chain-management-355304	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.		~
GRI 410: SI	ECURITY PRACTICES	2016					
103 1-2-3	Management Approach			http://www.telekom.hu/static-tr/sw/file/Code_of_Ethics.pdf https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-social-principles- eng.pdf			~
410-1	Security personnel trained in human rights policies or procedures	1			Security personnel employed by the company also participated in the compulsory human rights e-Training of all Magyar Telekom Group employees in 2019. 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.		~
GRI 411: RI	IGHTS OF INDIGENOU	S PEOPLES 2016					
103 1-2-3	Management Approach				In Hungary there is no adequate denotation of the group ,Indigenous Peoples'.		~
111-1	Incidents of violations involvi rights of indigenous peoples				In Hungary there is no adequate denotation of the group ,Indigenous Peoples'.		<b>~</b>
GRI 412: H	UMAN RIGHTS ASSES	SMENT 2016					
103 1-2-3	Management Approach	Diversity and inclusion Stakeholders – Suppliers		http://www.telekom.hu/static-tr/sw/file/Code_of_Ethics.pdf https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-social-principles- eng.pdf http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_Eselyegyenlosegi_ Terv_2016_2020_en.pdf https://www.telekom.hu/static-tr/sw/file/Employee-relations-policy.pdf			~
412-1	Operations that have been subject to human rights reviews or impact assessment	Stakeholders - Suppliers		http://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_Eselyegyenlosegi_ Terv_2016_2020_en.pdf	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 2019 relevant to all its Hungarian operations.		<b>~</b>
112-2	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 enrollment of the employees was conducted in four steps, in which the management of the company group took the training first. 85.3% of all people enrolled and 90% of the entire employee group have finished the course by September 18. The online training points to relevant human rights issues, regulations, complaint handling and wistleblowing 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 2018 and remained to be a mandatory course to all new entrants in 2019 as well.	1	*
412-3	Significant investment agree ments and contracts that include human rights clause or that underwent human rights screening			https://beszerzes.telekom.hu/beszerzes/portal/objects-beszerzes/doc/mukodesi_kodex_en.pdf https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-social-principles-eng.pdf	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.	t	•

Disclosure	Disclosure	Chapter in Sustainability					External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assuranc
GRI 413: L	OCAL COMMUNITIES 2	2016					
03 1-2-3	Management Approach	Stakeholders					~
413-1	Operations with local community engagement, impact assessments, and development programs	Stakeholders					<b>~</b>
413-2	Operations with significant actual and potential negative impacts on local communities			http://www.telekom.hu/about_us/company/telekom-for-digital-hungary	In some cases of network development processes the physical construction of the network might cause temporary inconvenience to residents.		~
GRI 414: S	UPPLIER SOCIAL ASSE	SSMENT 2016					
03 1-2-3	Management Approach	Stakeholders - Suppliers					~
114-1	New suppliers that were screened using social criteria	Stakeholders – Suppliers					~
414-2	Negative social impacts in the supply chain and actions taken	Stakeholders – Suppliers			Magyar Telekom has not terminated any contracts with any of its suppliers with reference to negative environmental impacts.		~
GRI 415: P	UBLIC POLICY 2016						
103 1-2-3	Management Approach				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 through e.g. the Telecommunication Reconciliation Council, 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 and the Hungarian Energy Traders' Association.		*
415-1	Political contributions			https://www.telekom.hu/static-tr/sw/file/mt-code-of-conduct.pdf https://www.telekom.hu/about_us/about_magyar_telekom/principles https://www.telekom.hu/about_us/about_magyar_telekom/principles/ compliance	The Company has no knowledge of any financial support to political parties, politicians or any related entities provided by Magyar Telekom Group affiliates in 2019, which is in full compliance with the detailed stipulations set forth in the Code of Conduct - Paragraph [2.10]. If it would have done so the operation would have been in full comliance with the relavant international bookkeping regulations.		•
GRI 416: C	USTOMER HEALTH AN	D SAFETY 2016					
103 1-2-3	Management Approach	Stakeholders		http://www.telekom.hu/about_us/society_and_environment/society/health_ and_safety https://www.telekom.hu/about_us/society_and_environment/society/ protection_of_our_children			<b>~</b>
416-1	Assessment of the health and safety impacts of product and service categories	xt			Magyar Telekom did not identify such impacts.		~
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"		~
GRI 417: M	IARKETING AND LABE	LING 2016					
1031-2-3	Management Approach	Our Approach – Sustainability strategy Climate protection Digitally enabled sustainability Stakeholders		http://www.telekom.hu/lakossagi/english http://www.telekom.hu/lakossagi/english/plans/mobile https://www.telekom.hu/lakossagi/english/plans/phone https://www.telekom.hu/uzleti/main http://www.t-systems.hu/home-page http://kibu.hu/ http://www.kalasznet.hu/ (only HU) https://www.telekom.mk/prepaid-en.nspx			~
417-1	Requirements for product and service information and labeling	•					<b>~</b>
417-2	Incidents of non-compliance concerning product and service information and labeling				The Company did not identify such incidents.		<b>*</b>
417-3	Incidents of non-compliance concerning marketing communications				In 2019 one consumer protection - e.g. marketing communication - proceedings was closed against Telekom before the Hungarian Competition Authority (GVH) due to the alleged breach of the relevant regulations. Magyar Telekom was fined in a "phased" manner meaning the 100 M Ft of fine is to be paid within 30 days, while an additional 100+ 150 M is to be payed should Magyar Telekom not comply with its commitments in order to reduce the fine.		<b>~</b>

Disclosure	Disclosure	Chapter in Sustainability					External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assurance
GRI 418: C	CUSTOMER PRIVACY 2	016					
103 1-2-3	Management Approach	Stakeholders		http://www.telekom.hu/about_us/data_protection			~
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Stakeholders			Magyar Telekom received requests and complaints from the National Authority for Data Protection and Freedom of Information and also directly from customers in 2019, which were duly investigated by Magyar Telekom, and the findings were reported to the complaining customer or to the Authority respectively. Based on the results of the investigation, we review our processes and make adjustments, if necessary. In 2019, 7 new proceedings were initiated by the Data Protection Authority in connection with the processing of personal data and 8 cases were closed. The Authority concluded 2 cases that no violation of the data protection rules had been found.		<b>~</b>
GRI 419: S	OCIOECONOMIC CON	IPLIANCE 2016					
103 1-2-3	Management Approach			https://www.telekom.hu/about_us/about_magyar_telekom/principles/compliance https://beszerzes.telekom.hu/beszerzes/portal_en?appid=beszerzes&page=english/main.vm	The Management and Board of Magyar Telekom Group are unanimous in their commitment that the Magyar Telekom Group (hereinafter 'Magyar Telekom' or '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 ('hereinafter '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		~
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 2019 the National Media and Info-Communications Authority conducted several individual complaint and general/overall market supervision proceedings against the Company. Within the frame of general market supervision proceedings the authority imposed 216 million HUF whereas in the case of subscriber complaints a total of 49.66 million HUF penalty. The District Offices of Government Offices, as bodies responsible for consumer protection completed several investigations against Magyar Telekom, in 2019 the total amount of fines were HUF 11.71 million. Our clients have used the services of alternative dispute resolution fora, in relation to which there were a total of 56 cases handled with the assistance of the Media and Communicatios Commissioner, and 407 cases in which dispute resolution plenums provided assistance.		•
TELECOM	IMUNICATION SECTOR	SPECIFIC INDICATORS					
INTERNAL	LOPERATIONS						
INVESTMI	ENT						
IO 1.	Capital investment in telecommunication network infrastructure broken down by country/region.						<b>~</b>
10 2.	Net costs for service providers under the Univers Service Obligation when extending service to geographic locations and low-income groups, which are not profitable. Describe relevant legislative and regulatory mechanisms.	Stakeholders al					*

Disclosure	Disclosure	Chapter in Sustainability		w		0	External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assurance
	IND SAFETY						
IIO 3.	Practices to ensure health and safety of field personn- involved in the installation, operation and maintenanc of masts, base stations, lay cables and other outside plant. Related health and	el e ng					·
	safety issues include worki at heights, electric shock, exposure to EMF and radic frequency fields, and expo- sure to hazardous chemica						
10 4.	Compliance with ICNIRP (International Commission Non-Ionising Radiation Protection) standards on exposure to radiofrequence (RF) emissions from hands	/		http://www.telekom.hu/about_us/society_and_environment/society/health_and_safety http://www.emf-portal.hu/portal/ (only HU)			<b>*</b>
IO 5.	Compliance with ICNIRP (International Commission on Non-Ionising Radiation Protection) guidelines on exposure to radiofrequency (RF) emissions from base stations.			http://www.telekom.hu/about_us/society_and_environment/society/health_and_safety http://www.emf-portal.hu/portal/ (only HU)			*
IO 6.	Policies and practices with respect to Specific Absorption Rate (SAR) of handsets			http://www.telekom.hu/about_us/society_and_environment/society/health_and_safety http://www.emf-portal.hu/portal/ (only HU)			<b>~</b>
INFRASTE	RUCTURE						
10 7.	Policies and practices on the siting of masts and transmal sion sites including stake-holder consultation, site sharing, and initiatives to reduce visual impacts. Describe approach to evaluate consultations and quantify where possible.	S-			The company consults and cooperates with the relevant stakeholders in each and every case when building new base stations. If needed, citizens' forums are held with the participation of all concerned parties in order to reach satisfactory agreement to all concerned parties.		*
IO 8.	Number and percentage of stand-alone sites, shared sites, and sites on existing structures.	f Climate protection					<b>~</b>
PROVIDIN	IG ACCESS						
ACCESS T	O TELECOMMUNICA	TION PRODUCTS AND SER	VICES: BRI	DGING THE DIGITAL DIVIDE			
PA 1.	Polices and practices to en able the deployment of tele communications infrastructure and access to telecommunications products and services in remote and low population density areas. Include an explanation of business models applied.	<del>-</del> - -					*
PA 2.	Policies and practices to overcome barriers for acce and use of telecommunication products and services including: language, cultur lliteracy, and lack of education, income, disabilities, arage. Include an explanation of business models applied	e, nd					•

Disclosure	Disclosure Title	Chapter in Sustainability	Paga	Website	Direct answer	Omission	External
Number	Title	Report 2019	Page	Menzile	Dircet answer	Omission	Assurance
PA 3.	Policies and practices to ensure availability and reliability of telecommunications products and services and quantify, where possible, for specified time periods and locations of down time.			http://www.telekom.hu/rolunk/szolgaltatasok/aszf (only HU)	Magyar Telekom Plc. guarantees its customers rights in connection with service availability and troubleshooting on the basis of the General Contract Terms and Conditions (GTC) available at the customer service points and also in the Internet. In this it declares to fulfill the published quality targets during providing services on the entire service territory, to check this via measurements and to publish the measurement methods. Here, the Company also defines the quality targets for the services provided, meeting of which is continuously measured and made available to everyone on an annual basis. The trouble management for customers is handled along a defined process - in accordance with their rights set out in the GTC, inter alia - after having detected the problem and having filed the trouble at the company.  Magyar Telekom, by permanently developing technical solutions, security systems and backup tools, seeks to ensure continuity of the availability of the services, with setting the enhancement of customer experience as an objective.		•
PA 4.	areas where the organisation operates. Examples include: customer numbers/market share, addressable market, percentage of population covered, percentage of land covered.	Key operating statistics of Magyar Telekom Group					•
PA 5.	Number and types of tele- communication products and services provided to and used by low and no income sectors of the population. Provide definitions selected. Include explanation of app- roach to pricing, illustrated with examples such as price per minute of dialogue/bit of data transfer in various re- mote, poor or low population density areas.	l Key operating statistics of Magyar Telekom Group					•
PA 6.	Programmes to provide and maintain telecommunication products and services in emergency situations and for disaster relief.	Climate protection					*
ACCESS T	O CONTENT						
PA 7.	manage human rights issues relating to access and use of telecommunications products and services.	Stakeholders					*
CUSTOME	R RELATIONS						
PA 8.	Policies and practices to publicly communicate on EMF related issues. Include information provides at points of sales material.	Stakeholders		http://www.telekom.hu/about_us/society_and_environment/society/health_and_safety			~
PA 9.	Total amount invested in programmes and activities in electromagnetic field research. Include description of programmes currently contributed to and funded by the reporting organisation.			http://www.telekom.hu/about_us/society_and_environment/society/health_and_safety			•

Disclosure	Disclosure	Chapter in Sustainability					External
Number	Title	Report 2019	Page	Website	Dircet answer	Omission	Assurance
PA 10.	Initiatives to ensure clarit of charges and tariffs.	y		http://www.telekom.hu/lakossagi/english/plans/mobile https://www.telekom.hu/lakossagi/english/plans/mobile https://www.telekom.hu/lakossagi/english/plans/phone https://www.telekom.hu/uzleti/main http://www.t-systems.hu/home-page http://kibu.hu/ http://www.kalasznet.hu/ (only HU) https://www.telekom.mk/prepaid-en.nspx	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. 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 carefuly contemplated and responsible decisions.		•
PA 11.	Initiatives to inform custo			https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek (only HU)			~
	about product features a applications that will pror			https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek/fenntarthato_ keszulekek (only HU)			
	responsible, efficient, cos	-		http://www.t-systems.hu/a-t-systemsrol/iranyelveink/gyartoi-tajekoztato (only HI			
	effective, and environme			map, mine systems and a constant of many ordering granter agence taken (only the			
	preferable use.	•					
TECHNOL	OGY APPLICATIONS	5					
RESOURC	E EFFICIENCY						
TA 1.	Provide examples of the	Climate protection					✓
	resource efficiency of tele	• ,					
	communication products and services delivered.	s sustainability					
TA 2.	Provide examples of tele-	Climate protection		https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek (only HU)			
1712.	communication products	·		The post of the state of the st			•
	services and applications	S					
	that have the potential to						
	replace physical objects						
	(e.g. a telephone book by database on the web or t	•					
	by videoconferencing).	raver					
TA 3.	Disclose any measures o	f Climate protection		https://www.telekom.hu/rolunk/fenntarthatosag/ugyfeleinknek (only HU)			
	transport and/or resource	•					•
	changes of customer use	of sustainability					
	the telecommunication						
	products and services lis above. Provide some ind						
	cation of scale, market si						
	or potential savings.	_0,					
TA 4.	Disclose any estimates or						~
	the rebound effect (indire						
	consequences) of custor use of the products and	ner sustainability					
	services listed above, and	d					
	lessons learned for futur	e					
	development. This may						
	include social consequer as well as environmental.						
TA 5.	Description of practices				Magyar Telekom respects intellectual property and observes the provisions of the relevant law. All software used by Magyar Telekom are procured from		
	relating to intellectual				lawful sources and are used in accordance with the provisions of law.		
	property rights and open						
	source technologies.						