

**THE DEUTSCHE TELEKOM**

**2011  
CORPORATE  
RESPONSIBILITY  
REPORT**

**An Assessment Based On  
Global Reporting Initiative Standards**



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# EXECUTIVE SUMMARY

Deutsche Telekom's 2011 Corporate Responsibility Report (CR Report) is not in accordance with the high level of reporting claimed by the company. In particular, the CR Report does not comply with the standards of the Global Reporting Initiative A+ level of reporting. Contrary to claims made by Deutsche Telekom, the CR Report is not "assured," or verified, by an outside source, and more important, the CR Report breaches standard disclosure requirements about Labor and Human Rights. For example:

- DT claims that eight core Labor indicators are "covered completely" in the report and one is "covered partly," but our analysis *shows three core Labor indicators are covered partly and the remaining six are not covered at all.*
- DT claims that all six core Human Rights indicators are "covered completely," but our analysis shows that only two are covered completely and four are covered partly.

Out of the company's 7 sustainability Key Performance Indicators, three relate to the environment and only one relates to workers—and that one aims to measure workers' understanding.

Deutsche Telekom does not respect important Global Reporting Initiative (GRI) reporting principles, including *boundary setting*, *balance*, and *clarity*. The company's compliance with the GRI materiality principle is also questionable, considering the size of the workforce and the many locations of DT's activities.

Deutsche Telekom has clear reporting weaknesses:

- In terms of the GRI *boundary setting principle*, in many cases, reporting by DT is limited to German facilities—thus *excluding almost half the workforce.*
- In terms of the *balance principle*, compliance is questionable as the CR Report tends to emphasize initiatives related to *managers only.*
- The *clarity principle* is not respected at all, as the GRI index prepared by DT is not precise enough to provide easy access to information, and some claims are not backed by adequate sources and definitions.

## Introduction

At the request of its U.S. affiliate, the AFL-CIO, the TUAC Secretariat has analyzed the claims made by the German company Deutsche Telekom in its 2011 Corporate Responsibility Report, *We Take Responsibility*.<sup>1</sup> In our analysis, we consider whether the Corporate Responsibility Report (CR Report) is meeting standards of the Global Reporting Initiative (GRI) guidelines at the A+ level. We pay particular attention here to Labor and Human Rights issues.

## Global Reporting Initiative: The Guidelines

The cornerstone of the Global Reporting Initiative is a set of *Sustainability Reporting Guidelines*, now in its third version—thus known as the *G3 Guidelines*.<sup>2</sup> The G3 Guidelines are divided into two parts:

- *Part 1, Reporting Principles and Guidance*, outlines *key principles* that any company should follow regarding the content and quality of its reports;
- *Part 2, Standard Disclosures*, outlines *specific disclosure requirements*, grouped under three categories:
  1. Strategy and Profile—a company-wide overview.
  2. Disclosure of Management Approaches—covering specific topics, including environmental, economic, and social factors. The social factors are those of most concern here, and include Labor rights, Human Rights, product responsibility, and society.
  3. Performance Indicators—covering the same topics as above, but at the individual level.

There are three *application levels* in terms of reporting, ranging from most to least demanding. The requirements for each level of reporting (A, B, & C) are found on the GRI website.<sup>3</sup> A report can be “assured” by an auditor or other third party as well, and when assured, then a plus (or +) is added to the application levels (A+, B+, C+).

A company may structure a report in a variety of ways and may use separate publications (apart from a main sustainability report) to report its GRI disclosures, but in any case, *must include a GRI index to show where the GRI disclosures can be found*.

## Deutsche Telekom’s Claims

Deutsche Telekom argues that its Corporate Responsibility report *meets the highest level—level A+*.<sup>4</sup> According to its GRI index, some of the disclosure requirements are outside the main CR report—in the Human Resource Report (HR Report) and in the Annual Report. Our assessment will distinguish between the Corporate Responsibility Report (CR Report), which includes most of the GRI requirements and more general “Deutsche Telekom reporting,” which includes the CR Report, the HR Report, and the Annual Report.

## Our Assessment Methodology

The G3 Guidelines cover a wide range of sustainability issues, so the reporting requirements are numerous and diverse. *The purpose of this analysis is to compare Deutsche Telekom’s reporting with trade union expectations regarding the G3 reporting guidelines*. To that end, we limit our assessment to those reporting requirements that are of *direct relevance* to workers, following five steps:

1. We assess how well DT reporting complies with the G3 Guidelines for reporting on the Labor *Disclosure on Management Approach (DMA)* and Human Rights DMA. The DMA should provide a concise overview of the company’s management approach to issues in order to provide some context for measuring performance.

2. We assess DT’s compliance with some of the general, group-wide, not issue-specific, disclosure requirements in the “Strategy and Profile” section of the G3 Guidelines. We look at the way the company selects the *key risks and impacts* at the group-level, and we look at the way the company selects Key Performance Indicators (KPI).
3. We verify whether DT’s reporting is *externally assured* as the company claims.
4. We discuss whether DT’s reporting accurately reflects the GRI principles, including *materiality, boundary setting, balance, and clarity*.
5. We verify DT’s claims about *reporting of Labor and Human Rights indicators*.<sup>5</sup>

## DISCLOSURE OF MANAGEMENT APPROACHES (DMA)

GRI Guidelines assume that a company will use a Disclosure of Management Approaches (DMA) to provide a brief overview of its management approach on a particular topic. We are particularly concerned here with Deutsche Telekom’s DMAs related to Labor and human rights, which we analyze below.

### Labor DMA

The DMA for “Labor Practices and Decent Work” requires disclosure of DT’s policies and goals related to:

- Employment
- Labor/Management Relations
- Occupational Health and Safety
- Training and Education
- Diversity and Equal Opportunity

### Disclosures should include:

- Links of company policies to *international standards*, such as the ILO Declaration on Fundamental Principles and Rights at Work of 1998 (in particular the eight core conventions of the ILO), the ILO Tripartite Declaration Concerning Multinational Enterprises and Social Policy, and the OECD Guidelines for Multinational Enterprises. These three documents are considered “primary reference points” for Labor rights.
- Identifying the “most senior position with operational responsibility” for Labor issues or how responsibility for Labor issues is divided among several positions.
- Explanations of certification systems and auditing programs covering the company or its supply chain.

The Deutsche Telekom website where the company claims to be reporting on the Labor DMA<sup>6</sup> points to two separate links:

- the *Employees* section of the CR Report.<sup>7</sup>
- Page 6 and subsequent material of the HR Report.<sup>8</sup>

**In the *Employees* section of the CR Report, DT states:**

*What makes a company successful in the long term? Telekom has a simple answer: A company needs a lively corporate culture and structures that facilitate and promote new ideas. We have taken key measures on our way to establishing this kind of corporate culture and becoming the most highly regarded service company in our industry.*

This text is followed by a chart showing how DT ranks employee and social issues along two axes: *relevance for external stakeholders* and *relevance for Telekom*. The page provides a link to *How We Define the Key Issues*, which points to DT's application of the G3 Guidelines' *Materiality* test.<sup>9</sup>

*Unfortunately, none of the above is relevant to the G3 Guidelines' Labor DMA reporting requirements.*

On Page 6 of Deutsche Telekom's HR Report (2010/2011) there is *no information* that could help inform readers about the company's Labor DMA. In fact, Page 6 is a cover page that reads "Your Partner in Business: the HR mission and how it meshes with the Group's strategy." The fifty pages that follow outline DT's overall human resource strategy, based on four pillars:

- Competitive workforce
- Service Culture
- Talent Agenda, and
- HR@2012

Without any guidance as to where to find relevant information, the reader is left to make his or her own interpretations. On page 40, we found relevant information that could possibly fulfill the disclosure requirements of the Labor DMA:

*When crafting relationships with our employees [...] it is important that we show respect for each individual country's legal and cultural characteristics. This is true above all in dealings with employee representatives and national Labor unions but also with national companies in which specific, legally required recognition proceedings prevent union representation. We do not consider it appropriate to "export" Germany's regulations to other countries. Instead, we respect the other forms of cooperation with legitimate employee representatives and/or workforces that have developed in different countries. In our Guideline for Cooperation with Employee Representatives, we have made it very clear that we support the individual responsibility of national management bodies and their HR functions in building employee relations. Our Guideline is based on our Guiding Principles as well as on national regulations and internationally recognized rules such as the United Nations Global Compact, the OECD guidelines, and the core Labor standards issued by the International Labor Organization (ILO)."*

Another paragraph explains DT's human resources management system (*Global Employee Relations Management (ERM)*), which provides:

*Guidance and encourages the exchange of experiences on structuring employee relationships in different countries. To this end, the unit has collaborated with the international HR community and other competence centers to develop a Group-wide Employee Relations Policy. This outlines our global philosophy regarding our relationship with our employees, while respecting the valid laws and cultural customs in the respective individual countries. [...] The department also offers support and advice on ensuring that Group-wide international regulations are compliant with Labor law. Finally, ERM is responsible for HR coordination and integration tasks within the context of Deutsche Telekom's international mergers and acquisitions."*

With the above information, DT seems to comply with the Labor DMA disclosure requirements, but only in a fragmented and confusing way. The above statements from the company also show that DT can indeed claim to have an organization-wide policy that references UN, ILO and OECD standards. But the policy is lopsided. DT's policy reflects both *decentralization and centralization*:

- *Decentralization*: Regardless of requirements of the UN, ILO, or OECD, workers' rights to union representation are to be defined by *national legislation*.
- *Centralization*: The Global Employee Relations Management (ERM) unit seems to exercise centralized control over human resources, mergers and acquisitions, and the industrial restructuring process.

## Human Rights DMA

The Human Rights DMA requires the same types of disclosure as the Labor DMA. Aspects specific to Human Rights are:

- Investment and Procurement Practices
- Non-discrimination
- Freedom of Association and Collective Bargaining

Regarding collective bargaining, the DMA specifically requires disclosure of company policies, "which may be reasonably considered likely to affect the decision of employees to join a trade union or bargain collectively."

The website where Deutsche Telekom claims to be reporting on its Human Rights policies<sup>10</sup> redirects readers to four distinct chapters of the CR Report:

- 1 Values and Guiding Principles
- 2 Competitive Workforce
- 3 Sustainability Strategy for Procurement
- 4 Supply Chain Management

In its Values and Guiding Principles section,<sup>11</sup> DT states that it is “working on establishing a value-oriented corporate culture throughout the Group driven by responsible and sustainable conduct.” *Workers are not mentioned explicitly in the list of people to be covered by these Values and Guiding Principles.*

But we should examine the Values and Guiding Principles more closely. Five stand-alone statements make up the Guiding Principles:

- Customer delight drives our action.
- Respect and integrity guide our behaviour.
- Team together — Team apart.
- Best place to perform and grow.
- “I am T — count on me.”

The DT *Code of Conduct*,<sup>12</sup> which was revised in 2010, deals with *data privacy*. The code is binding, applies group-wide, and has many detailed requirements.

Deutsche Telekom’s arguments about its *Competitive Workforce*<sup>13</sup> cover two topics: an on-going reorganization program of DT called One Company, and a group-wide *Total Workforce Management* system.

- *One Company*<sup>14</sup> is a “personal and organizational restructuring” program aimed at cost savings through streamlining the internal organisation of DT. In most cases this takes the form of *mergers* of fixed and mobile activities. DT claims to have continued “efforts to implement [...] personnel restructuring processes in a socially acceptable way.” But no group-wide policy is mentioned to substantiate that claim other than examples from Germany, including collective bargaining in 2009, early retirement schemes and severance programs for specific units. There is also mention of Vivento, an in-house placement agency for German workers leaving the company.
- DT’s *Total Workforce Management (TWM)*<sup>15</sup> is a centralized system of information on staff performance and characteristics at the individual level. Indeed, DT says “TWM creates global transparency on all internal and external staff, and does so in terms of quantity and quality, skills, age structure, costs and productivity.” One component of TWM is Global Labor Cost Management (LCM), which aims to “make personnel costs and remuneration structures in the national companies transparent for the entire Group.” One of the goals is to help guide cost and wage structures in the international subsidiaries.

The two remaining CR Report chapters, *Sustainability Strategy for Procurement* and *Supply Chain Management*, are *specific to DT’s supply chains* and provide more detail on the substance of Human Rights than do the above chapters dealing with the company’s workforce.

*Sustainability Strategy for Procurement*<sup>16</sup> describes various initiatives at length, but is difficult to read. Paragraphs overlap, definitions are missing, and self-aggrandizing statements outnumber factual ones. For example, DT highlights the importance of its Key Performance Indicators (KPI) for Sustainable Procurements, yet the weblink associated with this leads to an online questionnaire on the relevance of the group’s KPIs in general, not to specific information on procurement-related KPIs. The company says it provides detailed rules and standards to its suppliers, but we have not been able to find informa-

tion about those standards in the text. Below is a general overview of DT's sustainability strategy for procurement, based on the limited information available.

- “E-TASC”<sup>17</sup> is an online self-assessment questionnaire that DTs’ suppliers may respond to—but it is not required. Not all branches of DT use E-TASC, however: “OTE, T-Mobile USA and Slovak Telekom have [...] *indicated their interest* in using E-TASC,” but presumably haven’t yet taken part. More problematic is the fact that *no information is available on the content of the questionnaire and the outcome of the self-assessment*.
- Social audit program:<sup>18</sup> In 2010, 26 suppliers were audited. *No information is made available on the terms of reference of the audits, other than broad statements*, such as: “A general risk assessment of suppliers conducted by Telekom,” “an evaluation of the supplier self-assessment conducted by Telekom,” and a “personal communication with the suppliers.”<sup>19</sup>
- The DT *Social Charter* is non-binding, applies worldwide, and covers both DT’s own operations and that of its suppliers. The company explains, “Deutsche Telekom prefers to work with suppliers that exhibit environmental and social responsibility in their business practices. Because of this, we passed our Social Charter in 2003....The charter (...) is an integral part of our General Purchasing Terms and Conditions (...) we require all suppliers to comply with these basic principles as far as possible.” On substance the Charter commits DT to freedom of association and joining a trade union; elimination of all forms of slavery, child Labor, and forced Labor. Together, these commitments are in line with the four principles laid out in the ILO core Labor standards. The preamble states that the Social Charter is “in compliance with internationally recognized norms, directives and standards, in particular those of the ILO, OECD and the Global Compact.” *This is contradicted, however, by the Charter itself which discriminates against the right to join a union*. Unlike other core ILO principles—on child Labor, forced Labor, and discrimination—the *right to join a union is qualified, allowed only “within the scope of national regulations and existing agreements”*.

*Supply Chain Management*,<sup>20</sup> the final chapter on Human Rights we examine here, either repeats previously reported programs or elaborates on various workshops and conferences held with suppliers and industry associations.

*As in the case of the Labor DMA, it is difficult to form a definitive opinion on whether DT’s claim to comply with the G3 HR DMA is verified or not.*

## IDENTIFICATION OF KEY IMPACTS AND RISKS

Under G3 Guidelines, Deutsche Telekom should provide a strategic view of its sustainability that includes key impacts and risks, including:

- the company’s impact on the sustainability of stakeholders, “including rights as defined by national laws and relevant internationally agreed standards.”
- impacts on the financial performance of the company, which should specifically focus on “information relevant to financial stakeholders.”<sup>21</sup>

The webpage where DT says it is reporting on key impacts and risks<sup>22</sup> lists five sections:

- 1 Group profile
- 2 Group-wide steering
- 3 Risk and opportunity management
- 4 Annual Report 2010—Corporate governance
- 5 Annual Report 2010—Risk and opportunity management.

Links from each of the first three sections above lead to the same webpage,<sup>23</sup> which is the foreword of the CR Report, by the Deutsche Telekom CEO. The CEO commits to “open dialog with our customers, our shareholders, our suppliers and, of course, our employees” and to that end makes reference to the Global Compact. However, this statement *does not explain the relationship with and the impact on stakeholders as requested by the G3 Guidelines*.

The fourth section on key impacts and risks, Annual Report 2010—Corporate governance<sup>24</sup>—simply explains and lists the membership of DT’s two-tier board as required by German corporate law.

The fifth section, Annual Report 2010—Risk and opportunity management,<sup>25</sup> links to a webpage of the Annual report with a promising title: “*Risk early warning system expanded and improved / PTC arbitration proceedings and court cases settled.*” Unfortunately, the text is short and vague, claiming that DT units “regularly analyze risks and opportunities, both in our operating segments and in our central Group units” but goes no further. *There is no list of specific social or environmental impacts and risks as required under item 1.2 of the G3 Guidelines.*

## External Assurance

GRI Guidelines (disclosure item 3.13) require that a company inform on “the scope and basis of any external assurance report.” Since Deutsche Telekom claims that its reporting meets A+ standards, the company should provide information about its external assurance process. In DT’s GRI index, “Statement GRI Application Level Check” is listed as fulfilling this requirement. The statement is signed by Nelmara Arbex, Deputy Chief Executive of the GRI, dated 27 June 2011. The statement declares that “*GRI’s Report Services which have concluded that the report fulfils the requirement of Application Level A+.*” This information does *not* meet the requirements of GRI Guidelines asking for the “scope and basis” of the external assurance report.

In a search through DT’s reporting, other information can be found that relates to external assurances, including the web pages titled, “External Assurance” and “Independent assurance report.” Under the latter, a German auditor (from PricewaterhouseCoopers AG) says he has been mandated to certify a *selected number* of Key Performance Indicators as well as other sections, but the mandate does not cover all the required disclosure items and is limited to operations in Germany, Hungary, Slovak Republic, and the Netherlands. The auditor acknowledges the limitations—“*the integration of the central CR strategy should continue in the Group’s international subsidiaries.*”

## We must conclude:

- *The assurance certificate provided by PwC does not cover all of the G3 reporting items that are necessary for a GRI level A application.* In fact, the assurance covers *almost none* of it and is limited to Germany and three other European countries.
- Given the above, it comes as a surprise that the GRI Secretariat would approve DT's assertions. It is also puzzling that the GRI Secretariat could deliver an Application Level Check to DT given that DT's audit certificate was delivered on June 30, 2011, *three days after* the delivery of the GRI Secretariat Statement (dated June 27, 2011).

# REPORTING PRINCIPLES AND GUIDANCE

The following sections analyze Deutsche Telekom's application of a few GRI reporting principles based on the CR Report.

## Materiality Test and Selection of KPIs

According to the G3 Guidelines, *"the information in a report should cover topics and indicators that reflect the organization's significant economic, environmental, and social impacts, or that would substantively influence the assessments and decisions of stakeholders."* For the GRI,

*Materiality is the threshold at which an issue or Indicator becomes sufficiently important that it should be reported. . . . The emphasis within a report should reflect the relative priority of these material topics and Indicators. . . .*

*Assessments of materiality should also take into account the basic expectations expressed in the international standards and agreements with which the organization is expected to comply.*

To help guide a company in applying the materiality principles, the GRI Guidelines have some tests, emphasizing relevant laws, regulations, international agreements, or voluntary agreements that are significant to the company and its stakeholders. The GRI also emphasizes the importance of the *interests and expectations of stakeholders, including employees, shareholders, and suppliers.*

According to DT's GRI index,<sup>29</sup> the pertinent disclosure requirement is fulfilled by a webpage entitled "About this Report."<sup>30</sup> The page includes a link to DT's "Materiality process 2010-2011,"<sup>31</sup> which is supposed to be based on the GRI requirements. DT asked "selected Telekom employees and external stakeholders from Germany and abroad" to assess the topics of *economy, strategy, society, customers, employees, suppliers, climate and environment.*

A webpage focused on *employees* includes little information other than a ranking of topics:

1. the company's human resource strategy
2. diversity and equal opportunity

3. occupational health and safety
4. training and development
5. protection of employee data
6. remuneration and pension scheme

According to the G3 Guidelines, the materiality test should help identify the company's Key Performance Indicators (KPIs). DT lists seven *Corporate Responsibility (CR) KPIs*<sup>32</sup>. The table below compares the CR KPIs in terms of coverage and stakeholders.

Corporate Responsibility KPIs	Coverage	Key stakeholder
• DT shares held by SRI investors	Worldwide	Investors
• Employee Satisfaction CR	Worldwide	Workers
• Supplier self-declarative E-TASC statement	Worldwide	Suppliers
• Energy (Electricity) Consumption in MWh	Worldwide	The environment
• CO2 emissions	Worldwide	The environment
• “Take Back Mobile Devices” recycling program	Germany	The environment
• Public survey on DT’s Social Commitment	Germany	Public opinion

Clearly and surprisingly, *only one KPI relates to workers: the Employee Satisfaction Survey*.<sup>33</sup> This survey is held every other year, and it aims to measure workers' understanding of DT's social commitments and their satisfaction with these commitments. Little information is provided on the survey itself, or how “satisfaction” is defined. We find a little more information in the HR Report, which presents results of the “Pulse Check” of DT's workers worldwide. The Pulse Check consists of five questions:

- Two questions are too vague to be measured objectively: “How do you feel in the company?” “I feel that we at Deutsche Telekom cooperate as partners in the interest of the company's overall success.”
- Two questions measure the degree to which workers *understand* DT's strategy: “Do you understand the changes taking place in the company?” “I can explain the strategy to others.” No question asks whether workers accept that strategy.
- One question is irrelevant for the purpose of the survey: “Do you recommend our products and services to your family and friends?”

**From the above we conclude:**

- Out of 7 sustainability KPIs, 13 target the environment, 1 targets investors, 1 targets suppliers, 1 targets German public opinion, and only 1 targets DT's workers.

- The stand-alone KPI on workers aims to measure workers' understanding, *not acceptance or agreement with DT's strategy*.
- Two KPIs are limited to Germany.

*Given the more than 250,000 workers employed by DT, there is reason for concern that only one KPI relates to workers. There are reasons to believe that DT's process for selecting its KPIs is not in full compliance with the GRI reporting principle for materiality.*

## Other reporting principles

### BOUNDARY SETTING AND STAKEHOLDER INCLUSIVENESS

GRI Guidelines suggest that company reports should, at minimum, include:

- Entities over which the organization exercises control (covered by Indicators of Operational Performance)
- Entities over which the organization exercises significant influence (covered by Disclosures on Management Approach)

According to DT's GRI Index, both requirements are to be found on the webpage "About this Report."<sup>34</sup> This webpage includes a subsection entitled, "Reporting period, scope applications and target groups,"<sup>35</sup> which states that DT reporting "includes all European and U.S. subsidiaries in which Telekom holds the majority share." DT also states that its reporting is "primarily aimed at analysts and investors, CR ranking and rating agencies as well as non-governmental organizations," and "representatives from the worlds of science, research, education and politics."

*The fact that DT's workers are not targeted is disturbing given the size of the company and its number of employees.*

### BALANCE

GRI Guidelines state that both positive and negative aspects of a company should be reported, to allow for a balanced understanding, suggesting the following:

- disclose both favorable and unfavorable results and topics
- present information in a format that allows users to see positive and negative trends in performance on a year-to-year basis
- emphasize topics proportionate to their relative materiality

There are good reasons to believe that some "unfavourable results" are not reported as they should be. For example, reporting on social risks is weak. The DT report also puts disproportionate emphasis on philanthropic activities, on initiatives that benefit top management only, and on environmental performance.

## CLARITY

The GRI Guidelines suggest that information be presented in a clear, understandable way for stakeholders, citing these tests:

- Information should be readily accessible through tables of contents, maps, links, or other aids
- Information should be accessible to those with different needs in terms of language, technology, or abilities.

Unfortunately, Deutsche Telekom's GRI Index is not precise enough to allow for reasonable access to information. The index points to webpages with multiple links and readers must guess which subsections apply to their questions. Some statements are not backed by adequate sources or definitions. Some information conflicts with or contradicts other information.

## Overall Conclusions Regarding Reporting Principles

We question whether Deutsche Telekom has adequately complied with GRI **materiality principles**, especially considering the size of the DT workforce and its dispersal around the world. The company provides detailed reporting on environmental issues, but only one sustainability KPI of 7 relates to workers, and this seems a striking under-representation of workers' issues.

Deutsche Telekom also does not fully comply with GRI's **boundary-setting principles**. In many cases reporting is limited to German facilities, excluding almost half of the company's workforce.

The company provides questionable evidence of complying with the GRI **balance principle**. The CR Report overemphasizes initiatives benefiting managers only.

**Finally, compliance with the GRI principle of clarity is not respected at all.** The GRI index does not allow for reasonable access to information. Some statements and claims are not backed by adequate sources.

# CORE LABOR & HUMAN RIGHTS PERFORMANCE INDICATORS

Deutsche Telekom's A-level reporting is expected to comply with disclosure requirements in 9 *Core Labor Indicators*, and 6 *Core Human Rights Indicators*. These indicators are listed in the table below, abbreviated as LA and HR respectively. According to DT's GRI index on "Social Performance indicators,"<sup>36</sup> all core Labor and Human Rights indicators are "covered completely," except LA 10, which is said to be "covered partly." DT also claims reporting on other Labor and Human Rights indicators than the core indicators. These are listed in the table as well

We have cross-checked each Labor and Human Rights indicator, per the GRI G3 Indicator Protocols,<sup>37</sup> with the information provided by the DT GRI index. Results of that cross-check are summarized below.

Core Indicators required for an A-level reporting	Claims by DT	Outcome of the assessment
LA1	Covered completely	Covered partly
LA2	Covered completely	Not covered
LA4	Covered completely	Not covered
LA5	Covered completely	Not covered
LA7	Covered completely	Not covered
LA8	Covered completely	Not covered
LA10	Covered partly	Covered partly
LA13	Covered completely	Covered partly
LA14	Covered completely	Not covered
HR1	Covered completely	Covered completely
HR2	Covered completely	Covered partly
HR4	Covered completely	Covered completely
HR5	Covered completely	Covered partly
HR6	Covered completely	Covered partly
HR7	Covered completely	Covered partly

Other Indicators	Claims by DT	Outcome of the assessment
LA3	Covered completely	Not covered
LA6	Covered completely	Not covered
LA9	Covered completely	Not covered
LA11	Covered completely	Covered completely
LA12	Covered partly	Covered partly
HR3	Covered partly	Not covered

### Our conclusions are the following:

- DT claims that 8 core Labor indicators are covered completely and 1 core Labor indicator is covered partly by its reporting framework. Our assessment shows 3 core Labor indicators are covered partly, and 6 are not covered at all.
- DT claims that 6 core Human Rights indicators are covered completely by its reporting framework, our assessment shows that 2 are covered completely and 4 are covered partly.
- When combining core and non-core indicators, DT claims that 18 Labor and Human Rights indicators are covered completely and 3 are covered partly. Our assessment shows 3 indicators are covered completely, 8 are covered partly, and 10 are not covered at all.

## Core Labor Indicators

### LA1 - TOTAL WORKFORCE (EMPLOYMENT TYPE, EMPLOYMENT CONTRACT, AND REGION)

According to the GRI, a company should:

- Report the total number of employees broken down by type of employment contract.
- Report the total number of permanent employees broken down by employment type.
- Report the total workforce broken down by region.

According to Deutsche Telekom, its HR Report<sup>38</sup> covers LA1. The HR Report includes a regional breakdown of the workforce worldwide and information on the distribution per type of employment but only for operations located in Germany. No information on the distribution per type of employment contract could be found.

LA1 Disclosure Requirements	Coverage	Compliance with the Protocol
Regional breakdown	Worldwide	Full
Distribution of staff between permanent vs. temporary contracts	No	No
Distribution of staff between full-time vs. part-time employment	Germany	Incomplete
Overall	Incomplete	Incomplete

### LA2 EMPLOYEE TURNOVER (RATE BY AGE GROUP, GENDER, AND REGION)

A company under the GRI Guidelines should report the total number and the rate of employees leaving during the reporting period. Figures should be broken down by gender, age group, and region.

DT reporting of LA2<sup>39</sup> includes annual figures on the total workforce worldwide since 1997, but no information on the number and turnover of workers leaving employment.

LA2 Disclosure Requirements	Coverage	Compliance with the Protocol
Number and rate of employees leaving employment	No	No
Distribution by age and gender	No	No
Overall	No	No

### LA3 BENEFITS FOR FULL-TIME EMPLOYEES (NOT PROVIDED TO TEMPORARY OR PART-TIME EMPLOYEES)

Per GRI Guidelines, a company should report the coverage of full-time employees with life insurance; health care; disability/invalidity coverage; maternity/paternity leave; retirement provision; and stock ownership.

DT reports LA3 information, according to its GRI Index,<sup>40</sup> in three different sources:

- a webpage about the company's pension scheme in Germany<sup>41</sup>
- pages of the Annual Report 2010 section on Employees, shown online<sup>42</sup>
- a section of DT's website in German<sup>43</sup>

DT reporting provides information on its *pension scheme* in Germany only. No information could be found with regard to other countries or other occupational benefits as required in the G3 Guidelines.

LA3 Disclosure Requirements	Coverage	Compliance with the Protocol
Life insurance schemes	No	No
Existence of health care schemes	No	No
Disability/invalidity coverage	No	No
Maternity/paternity leave schemes	No	No
Pension schemes	Germany	Incomplete
Employee stock ownership plans	No	No
Overall	No	No

#### LA4 EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS

According to GRI protocols for this indicator, a company should:

- Identify the total *number of employees* covered by collective bargaining agreements.
- Report the *percentage of total employees* covered by collective bargaining agreements

Deutsche Telekom's GRI Index<sup>44</sup> says LA4 is reported in the HR Report, but we found information on recent collective bargaining *in Germany only*, with the following comment:

*In Germany Telekom has agreed to most of the conditions of employment for its employees with its employee representatives on the basis of collective bargaining. There are exceptions for senior executives and a few small companies not covered by collective agreements. Internationally, Telekom aligns itself to the participatory culture of the relevant country. This means there is a diverse landscape of collective bargaining agreements in the various international Group companies. The responsibility for the negotiating and signing collective agreements lies with the management of the relevant national company.*

DT reporting *does not inform on the coverage of collective agreement*, although information is provided on recent developments in Germany.

LA4 Disclosure Requirements	Coverage	Compliance with the Protocol
Total number and percentage of total employees covered by collective bargaining agreements	Germany, no figures provided	No
Overall	No	No

#### LA5 MINIMUM NOTICE PERIODS

A company, under the GRI protocol for LA5, is expected to report the minimum number of weeks notice it provides to employees before implementing major operational changes. Rules vary depending on whether there are collective agreements or not.

Per DT's GRI Index<sup>45</sup> LA5 is reported in the HR Report, but *we found no information on the indicated page. The link includes this comment:*

*In the case of significant operational changes, the relevant works councils are informed and involved according to the legally applicable provisions such as the German Works Constitution Act.*

*In addition, there is a regular exchange with the employee representatives, both on the national and international level. We have established a Global Employee Relations Management (ERM) unit at Group level during the reporting period. It provides guidance and promotes an exchange of experiences for building the diverse employee relationships in various countries. It is also a central contact for all international employee and employer committees and the Labor unions.*

LA5 Disclosure Requirements	Coverage	Compliance with the Protocol
Minimum number of weeks notice typically provided to employees	No	No
Report whether the notice period and/ or provisions for consultation and negotiation are specified in collective agreements	Germany and EU (European Works Council), no figures are provided	No
Overall	No	No

#### LA6 PERCENTAGE OF TOTAL WORKFORCE MANAGEMENT-WORKER HEALTH AND SAFETY COMMITTEES

DT's GRI Index claims that LA6 is reported,<sup>46</sup> but the index does not indicate where the information can be found.

LA6 Disclosure Requirements	Coverage	Compliance with the Protocol
Total workforce represented in formal joint management-worker health and safety committees	No	No
Overall	No	No

#### LA7 RATES OF INJURY, DISEASE, LOST DAYS, ABSENTEEISM, AND WORK-RELATED FATALITIES

According to the GRI protocol for LA7, a company should identify the total workforce and independent contractors working on-site for whose general safety it is liable, and should "report injury, occupational diseases, lost days, and absentee rates." An absolute number of fatalities should be reported as well.

According to the DT GRI index,<sup>47</sup> LA7 is reported by three different sources:

- A health rate of workers in Germany<sup>48</sup>
- Rate of occupational accidents per thousands of employees in Germany<sup>49</sup>
- Page 17 of the HR Report, which reproduces the above rate of accidents for German employees.

LA7 Disclosure Requirements	Coverage	Compliance with the Protocol
Injury rates	Germany	Incomplete
Occupational diseases rates	No	No
Lost days	No	No
Absentee rates	No	No
Overall	No	No

## LA8 EDUCATION, TRAINING, COUNSELING, PREVENTION, AND RISK-CONTROL PROGRAMS RELATED TO SERIOUS DISEASES

GRI Guidelines expect a company to report any programs related to assisting workers and family members regarding serious diseases.

The Deutsche Telekom GRI Index<sup>50</sup> claims that LA8 is reported in a webpage called “Health Management”<sup>51</sup> and on page 17 of the HR Report. The webpage on health management links to an Award received by the German government, the organisation of a one-time employee survey on work-related mental stress, the commitment of DT to promote “health literacy and health awareness among the entire workforce” and to support “group-wide concept of occupational safety and health with a standardized international health and safety management system.” Page 17 of the HR report reproduces the same information. *This does not fulfil the requirements.*

LA8 Disclosure Requirements	Coverage	Compliance with the Protocol
Programs related to assisting workforce members, their families, or community members regarding serious diseases	No	No
Workers involved in occupational activities who have a high incidence or high risk of specific diseases	No	No
Overall	No	No

## LA9 TRADE UNION AGREEMENTS ON HEALTH AND SAFETY

The DT GRI Index<sup>52</sup> claims that there is reporting on LA9, but provides *no further information* other than the following statement: “Industrial safety issues are also addressed in negotiations with the social partners.”

LA9 Disclosure Requirements	Coverage	Compliance with the Protocol
Trade union agreements on health and safety	No	No
Overall	No	No

## LA10 AVERAGE HOURS OF TRAINING

GRI Guidelines suggest that a company should identify various categories of employee training and the hours spent in that training by employees during each year. The company should identify (i) “the total number of employees in each employment category across the organization’s operations at the end of the reporting year (including senior management, middle management, professional, technical, administra-

tive, production, maintenance)”, (ii) “total hours devoted to training personnel within each employee category,” and (iii) “average number of hours of training per year per employee by employee category.”

In the DT GRI Index<sup>53</sup> LA10 (presented as “training per employee”) is reported incompletely with the following statement:

*In 2010, our employees received on average 37.2 hours of training. A breakdown by employee category is not relevant for Telekom as the training and development offers are open to all employees equally.*

LA10 Disclosure Requirements	Coverage	Compliance with the Protocol
Total number of employees in each employment category across the organization’s operations at the end of the reporting year	No	No
Total hours devoted to training personnel within each employee category	No	Incomplete
Average number of hours of training per year per employee by employee category	Not specified	Incomplete
Overall	No	No

#### LA11 PROGRAMS FOR SKILLS MANAGEMENT AND LIFELONG LEARNING

According to the LA11 protocol, a company is expected to report employee training or assistance programs to upgrade skills, including: internal training courses; funding support for external training or education; and provision of sabbatical periods with guaranteed return to employment. The company should also report transition programs to support employees “who are retiring or who have been terminated,” including: pre-retirement planning for intended retirees; retraining for those intending to continue working; severance pay; job placement services; and assistance (such as training and counseling) on transitioning to a non-working life.

In the Deutsche Telekom GRI Index<sup>54</sup> LA11 is mentioned in three ways:

- The “Talent Agenda,”<sup>55</sup> and several other programs in a variety of countries that are primarily aimed at executive management staff. The “Go Ahead!” program, on the other hand, covers a broader population and involves 33,000 employees in Germany as well as in Austria, Croatia, the Netherlands, and the Czech Republic.
- The “One Company” Personnel and Organizational Restructuring<sup>56</sup> already reported and discussed under the HR DMA above.
- Part of the HR Report repeats some of the above information, and explains the company’s “Vivento Personnel Restructuring” program in Germany.

We can conclude that DT does fulfill, in broad terms, the disclosure requirements of LA11, despite the fact that coverage is limited to Europe.

LA11 Disclosure Requirements	Coverage	Compliance with the Protocol
Employee training or assistance programs to upgrade skills	Germany and other European countries	Yes
Transition programs to support employees “who are retiring or who have been terminated”	Germany and other European countries	Yes
Overall	Incomplete	Yes

### LA12 REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS

According to the protocols, a company should report the percentage of employees receiving formal performance reviews during the reporting period.

The DT GRI index<sup>57</sup> indicates that *LA12 is incompletely reported*. The webpage says there are various mechanisms for feedback to employees, and links point to the “Human Resources Development”<sup>58</sup> webpage mentioned above. DT acknowledges that the percentage of employees who receive regular performance and career development reviews is *not determined at present, but the company plans “to determine this percentage from 2012.”*

The index also links to a webpage called “Cultural Transformation,”<sup>59</sup> which reports on “One Company” and other programs designed to restructure performance evaluations: “Change House,” “Change Navigator,” “Change Community,” “Telekom Wiki.” The bi-annual employee “pulse surveys” (mentioned above) are cited as a source of detailed feedback from employees.

LA12 Disclosure Requirements	Coverage	Compliance with the Protocol
Percentage of total employees who received a formal performance appraisal and review during the reporting period	Germany and other European countries	Incomplete
Overall	Incomplete	Incomplete

### LA13 COMPOSITION OF GOVERNANCE BODIES AND DEMOGRAPHIC DIVERSITY

According to the indicator’s protocol, a company should report on its own diversity and should disclose the percentage of the female population, of minority groups, and of various age groups per employee category.

DT’s GRI index<sup>60</sup> points to a webpage called “Diversity”<sup>61</sup> that provides incomplete information on gender and minority group diversity, including:

- The share of women in managerial positions worldwide
- The number of women in the 66-Strong management team

- The 17 women who sit on Telekom supervisory boards (in Germany) and the 15 women who hold positions on supervisory boards of foreign subsidiaries
- The percentage of women among “new high-potential recruits”
- Information about various initiatives, such as “dialog forums” and “networks for women” in Germany and European countries, as well as a network for LGBT employees

LA13 Disclosure Requirements	Coverage	Compliance with the Protocol
Shares (%) of the female population, of minority groups and of age groups per employee category.	Germany and other European countries	incomplete
Overall	Incomplete	Incomplete

#### LA14 RATIO OF BASIC SALARY OF MEN TO WOMEN BY EMPLOYEE CATEGORY

Deutsche Telekom’s GRI index<sup>62</sup> points to a webpage titled “Remuneration,”<sup>63</sup> which in turn links to a webpage called “Deutsche Telekom is Committed to Fair Pay.”<sup>64</sup> DT states that it conducted a salary survey comparing the salaries of female and male employees in March 2009,” but does not reveal the results, except to say that no gender-specific pay differences exist. The page also explains the 2011 collective bargaining round in Germany, a group-wide standardized pay system for executives, and its German pension scheme.

LA14 Disclosure Requirements	Coverage	Compliance with the Protocol
Ratio of basic salary of men to women by employee category	No	No
Overall	No	No

## Core Human Rights Indicators

#### HR1 PERCENTAGE AND TOTAL NUMBER OF AGREEMENTS WITH HUMAN RIGHTS CLAUSES

Human Rights clauses and proper screening are carefully defined in the GRI Guidelines. According to the indicator’s protocol, Human Rights clauses are defined as “specific terms in a written agreement that defines minimum expectations of performance with respect to Human Rights as a requirement for investment.” Human Rights screening is defined as “a formal or documented process that applies a set of Human Rights performance criteria as one of the factors in determining whether to proceed with an investment.”

DT's GRI Index<sup>65</sup> shows the company's "Sustainability Strategy for Procurement"<sup>66</sup> and the E-TASC<sup>67</sup> and the Social Audits<sup>68</sup> pages mentioned above. *DT does fulfill, in broad terms, the disclosure requirements of HR1, despite the fact that neither the E-TASC nor the Social Audits amount to real "screening" processes.*

HR1 Disclosure Requirements	Coverage	Compliance with the Protocol
Percentage total number of significant investment agreements that include Human Rights clauses or that have undergone Human Rights screening	World wide	Yes
Overall	Yes	Yes

## HR2 PERCENTAGE OF SIGNIFICANT SUPPLIERS AND CONTRACTORS UNDERGOING HUMAN RIGHTS SCREENING

Again, the Guidelines provide specific definitions for how a company should screen suppliers and contractors in terms of Human Rights. The company should "identify the total number of the reporting organization's significant suppliers and contractors" and report:

- "the percentage of contracts with significant suppliers and contractors that included criteria or screening on Human Rights," and
- "the percentage of contracts with significant suppliers and contractors that were either declined or had imposed performance conditions, or were subject to other actions as a result of Human Rights screening."

Human Rights clauses are defined as "Specific terms in a written agreement that define minimum expectations of performance with respect to Human Rights as a requirement for investment." Human Rights screening is defined as "a formal or documented process that applies a set of Human Rights performance criteria as one of the factors in determining whether to proceed with an investment."

The Deutsche Telekom GRI Index<sup>69</sup> connects to the 2010 results of the Social Auditing Programs<sup>70</sup> mentioned above. The page gives some details on the outcome of 26 audits conducted in 2010 (for by DT internal staff, and 22 by external auditors). *The audits revealed 74 cases of violations, 28 of which were critical.* DT includes a chart showing the distribution of the violations.

Deutsche Telekom reports no cases of violation of the *right to freedom of association and collective bargaining*. It is not clear whether this is because no cases occurred, or because the terms of reference of DT social audits specifically exclude this human right. *Put simply, the DT disclosure is not complying fully with the protocol.*

HR2 Disclosure Requirements	Coverage	Compliance with the Protocol
Percentage of significant suppliers and contractors that have undergone screening on Human Rights and actions taken	Worldwide	Incomplete
Overall	Yes	Incomplete

### HR3 TOTAL HOURS OF EMPLOYEE TRAINING ON POLICIES AND PROCEDURES CONCERNING HUMAN RIGHTS

The DT GRI Index<sup>71</sup> states that DT offers “training courses for procurement managers and joint workshops with suppliers” and will introduce a “new e-learning tool in the CR area.” But there is no good qualitative information available for most current training programs because they are done on a self-study basis.

HR3 Disclosure Requirements	Coverage	Compliance with the protocol
Total hours of employee training on policies and procedures concerning aspects of Human Rights that are relevant to operations, including the percentage of employees trained	Worldwide	No
Overall	Yes	No

### HR4 TOTAL NUMBER OF INCIDENTS OF DISCRIMINATION AND ACTIONS TAKEN

Under the GRI protocols, a company should identify and take action against a variety of acts of discrimination as defined by the ILO and report the total number of incidents. Discrimination here includes incidents on grounds of “race, color, sex, religion, political opinion, national extraction or social origin... or other relevant forms of discrimination involving internal and/or external stakeholders across operations in the reporting period.” Incidents in that context refer to “legal actions, complaints registered with the organization or competent authorities through a formal process, or instances of non-compliance identified by the organization through established procedures such as management system audits or formal monitoring programs.” The company should report “the total number of incidents of discrimination during the reporting period.”

*In the DT GRI index<sup>72</sup> DT reports “no confirmed incident of discrimination in the reporting period.”*

HR4 Disclosure Requirements	Coverage	Compliance with the Protocol
Total number of incidents of discrimination and actions taken	Worldwide	Covered
Overall	Yes	Covered

## HR5 OPERATIONS IN WHICH FREEDOM OF ASSOCIATION OR COLLECTIVE BARGAINING MIGHT BE AT RISK

Per GRI guidelines, a company should report operations in which collective bargaining or freedom of association are at risk—and what actions are being taken to avoid this. The company should also report “any measures taken by the organisation in the reporting period intended to support rights to freedom of association and collective bargaining” as defined by ILO Core Conventions 87 & 98 as well as ILO Tripartite Declaration and OECD Guidelines for Multinational Enterprises. Freedom of association is defined as situations in which “workers and employers may establish and join organizations of their own choosing without the need for prior authorization.”

In the DT GRI Index,<sup>73</sup> DT states that it is “not aware of any incidents of this nature,” that it “recognizes the fundamental right to freedom of association and the right to collective bargaining within the scope of national regulations and existing agreements.” *There is a statement specific to the U.S. operations of DT as well, specifically:*

*T-Mobile USA complies and will continue to comply with the meaning and spirit of U.S. Labor law (U.p. National Labor Relations Act), which guarantees employees freedom of association and the right to set up and join a union. The employees of T-Mobile USA have the right to set up a union or join one of their own free will, as well as to decide not to do so. T-Mobile will neither obstruct its employees from joining a union nor discriminate against anyone who attempts to do so. If a group of employees were to join a union based on the legal procedure in place in U.S. law, T-Mobile USA would recognize the right of that group to exercise its collective bargaining rights. Ultimately, however, it is the decision of each individual employee as to whether he/she wishes to join a union or not. To date, no T-Mobile employee has decided to have his/her interests represented by a union.*

*Thus, DT denies the existence across the company, world-wide, of any operation that may put at risk the right to join a union or to engage collective bargaining.* Nevertheless, Deutsche Telekom adds specific comments on its operations in the U.S., where there are allegations of anti-Labor policies. DT makes its statement based on U.S. domestic law, not on the ILO Core Conventions 87 & 98, the ILO tripartite declaration and the OECD Guidelines for Multinational Enterprises as requested by the protocol. In addition, the coverage does not appear to include suppliers.

HR5 Disclosure Requirements	Coverage	Compliance with the Protocol
Operations identified in which the right to exercise freedom of association or collective bargaining may be at significant risk,	US operations	Incomplete
Actions taken to support these rights		n.a
Overall	Incomplete	Incomplete

## HR6 OPERATIONS WITH RISK FOR CHILD LABOR

According to GRI, a company should identify any operations at risk of Child Labor or hazardous conditions, based on definitions provided by ILO Conventions 138 and 182.

The DT GRI index<sup>74</sup> links to the 2010 results of 26 Social Audits,<sup>75</sup> including *six cases of violation* relating to Child Labor out of a total of 68 violations of DT's social auditing (whose terms are not disclosed). Although DT reports incidents of Child Labor, the disclosure of the results of the auditing program is not detailed enough to clarify specific operations where that risk is significant. There is also no assurance that Child Labor is defined in accordance to ILO conventions. DT simply declares that "measures were immediately introduced to improve conditions on site."

HR6 Disclosure Requirements	Coverage	Compliance with the Protocol
Operations identified as having significant risk for incidents of child Labor, and measures taken to contribute to the elimination of child Labor.	Suppliers	Incomplete
Actions taken to support these rights		Complete
Overall	Incomplete	Incomplete

## HR7 OPERATIONS WITH RISK FOR FORCED OR COMPULSORY LABOR

GRI expects a company to identify operations with significant risk for forced or compulsory Labor, based on definitions provided by ILO Core Conventions 29 & 105.

The Deutsche Telekom GRI index<sup>76</sup> links to the 2010 results of the 26 Social Audits mentioned above,<sup>77</sup> including *one case of violation* relating to Forced Labor, out of a total of 68 violations. Although DT reports one incident of forced Labor, the disclosure of the results is not detailed enough to clarify which specific operations are most at risk.

There is no assurance that forced Labor is defined in accordance with ILO conventions. DT declares that "measures were immediately introduced to improve conditions on site."

HR7 Disclosure Requirements	Coverage	Compliance with the Protocol
Operations identified as having significant risk for incidents of forced or compulsory Labor, and measures taken to contribute to the elimination of forced or compulsory Labor.	Suppliers	Incomplete
Actions taken to support these rights		Complete
Overall	Incomplete	Incomplete

## ABOUT THE AUTHOR

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The Trade Union Advisory Committee (TUAC, [www.tuac.org](http://www.tuac.org)) is an international trade union organisation which has consultative status with the OECD and its various committees. TUAC has 56 affiliated national trade union confederations based in OECD economies and is a member of the Council of Global Unions.

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# ENDNOTES

- 1 [http://www.download-telekom.de/dt/StaticPage/87/05/88/dtag\\_cr\\_report\\_2010.pdf\\_870588.pdf](http://www.download-telekom.de/dt/StaticPage/87/05/88/dtag_cr_report_2010.pdf_870588.pdf)
- 2 DT claims reporting according to the G3 Guidelines . However in 2011 the GRI adopted a slightly revised version of the G3 Guidelines, known as “G3.1”.
- 3 <http://www.globalreporting.org/ReportingFramework/ApplicationLevels/>
- 4 <http://www.cr-report.telekom.com/site11/en/ueber-diesen-bericht/gri-index/index.php>
- 5 DT reporting is supposed to be at an A level, so should include all core performance indicators. In the case of Labor and Human Rights, that means DT should report on: LA1, 2, 4, 5, 6, 7, 8, 10, 11,13 & 14 as well HR1, 2, 4, 5, 6 & 7.
- 6 <http://www.cr-report.telekom.com/site11/en/ueber-diesen-bericht/gri-index/gesellschaftliche->
- 7 <http://www.cr-report.telekom.com/site11/en/beschaefigte/index.php?tcfs=30e13116a1b978f7bdbada85029dee8c>
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- 10 <http://www.cr-report.telekom.com/site11/en/ueber-diesen-bericht/gri-index/gesellschaftliche-leistungsindikatoren/index.php#ff,44928>
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- 17 <http://e-tasc.achilles.com/>
- 18 <http://www.cr-report.telekom.com/site11/en/lieferanten/lieferantenmanagement/social-audits/index.php#ff,43862,43863>
- 19 Under a separate section however, it is alluded that the social audits are based on DT’s (i) data privacy Code of Conduct, (ii) fraud policy and (iii) the below mentioned “Social charter.” (“We conduct regular social audits to make sure that our suppliers comply with the mandatory minimum standards specified in the Code of Conduct, the Fraud Policy and the Social Charter”).
- 20 <http://www.cr-report.telekom.com/site11/en/lieferanten/lieferantenmanagement/index.php#ff,43856,43857,43858,43861>
- 21 See Section One of the disclosure item 1.2. <http://www.globalreporting.org/NR/rdonlyres/53984807-9E9B-4B9F-B5E8-77667F35CC83/o/G31GuidelinesinclTechnicalProtocolFinal.pdf>
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