



ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

ESG

Environmental, Social and Governance Statement

Dstelecom is a wholesale-only telecommunications operator that built and operates the first and largest multi-operator FTTH fiber optic network in Europe.

Dstelecom was born in 2008 to build a fiber-optic backbone to connect 11 municipalities in the North of Portugal. In 2010, dstelecom won the international public tender, launched by the Portuguese Government, to construct, manage, operate, and maintain Next Generation Networks in 44 counties in the North and 35 in Alentejo and Algarve. This fiber-optic infrastructure was completed in late 2013, covering 250 thousand homes.

In just a few years, we more than doubled the infrastructure, and 600 thousand families in 100 Municipalities can now enjoy telecommunications services from all retail operators operating in Portugal. We continue to expand our footprint and expect to reach 1 million families by 2023.

dstelecom is recognized as an industry benchmark – achieved by safeguarding the business model's neutrality and providing quality service centered on the most modern technologies available.

Our biggest asset, our most outstanding achievement, was, and still is, the TRUST of THE MARKET. And this last asset is one of the most important to support our business and ambition. All the fixed-only and convergent Portuguese telecom operators are currently clients of dstelecom, valuing its absolute neutrality and transparency.





WHY

Our mission is to eliminate geographical barriers and to allow all Portuguese people - from the coast to the interior - to have the same opportunity to interact with the world through digital highways. Our goal is to root people, attract investment, and create opportunities in sparsely populated regions.

AMBITION

We want to extend the footprint of the FTTH network in Portugal, both in current areas and in neighboring municipalities.

We want to support the development of smart cities in our regions. We want to replicate the multi-operator business model for submarine cables and the 5G mobile network.

We want to export the multi-operator business model to other geographies.

OUR BELIEFS

01 Climate and demographic changes are one reality and will affect our way of living.

We believe that People-centric workplaces bring higher organizational growth and profits, committed and engaged employees, and more satisfied customers.

02

03 We acknowledge that our business activities affect the society and environment around us.

We believe that diversity makes us strong. We believe in pursuing and promoting diversity and inclusion to explore the most significant source of Innovation.

04

05 We have the opportunity, the power, and duty to help create lasting and ensure a positive impact and create a sustainable and more prosperous world.

Continued commitment to high ESG standards is the best way for our shareholders to achieve their investment goals while at the same time ensuring that the environment and communities can benefit as well.

06

OUR COMMITMENT

Inspired by our beliefs, we decided to incorporate Environmental, Social, and Governance (ESG) factors into our business practices, operational and investment processes. We are taking steps to understand the sustainability risk factors of our day-to-day activities to integrate them into our ESG strategy and incorporate ESG factors in all stages of the investment life cycle.



We believe and defend business ethics as the heart of corporate governance.

Honesty, trust, transparency, and fairness are core values in dstelecom. We strongly believe that the success of our business is dependent on the trust and confidence we earn from our employees, customers, and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals solely through honorable conduct. We set the tone on this topic at the management level. Management has the added responsibility for demonstrating, through their actions, the importance of this Code.

Ethical behavior does not simply happen; it results from clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. dstelecom management and its employees will at all times demonstrate the highest levels of integrity, truthfulness, and honesty to uphold both personal and corporate reputations and to inspire confidence and trust in their actions. dstelecom will always conduct its business competently, fair, impartial, and efficient.



OUR COMMITMENT

All dstelecom employees are committed to environmental responsibility at all times. Besides being our duty to build a better world, we firmly believe that making the right environmental decision leads to better investment outcomes and increased wellbeing of our stakeholders and community.

dstelecom's commitment to integrity begins with complying with laws, rules, and regulations where we do business. In dstelecom, our responsibility to national and international ESG legislation is recognized by monitoring present compliance and actively managing future ESG regulation risks.

dstelecom is fully committed to sound corporate governance principles. We strive to have a transparent, fair, and professional dialogue with our employees, business partners, and shareholders. Internally, we value our transparent relationship and equal dealings with our shareholders to ensure equitable sharing of accurate information.

We are deeply committed about the future that we will shape with our employees and stakeholders.

EGS STRATEGY FOCUS IS DIRECTED TO FOUR CORE PILLARS

01

As a Human-centered company, our priority will be to take care of our people. Fostering inclusive, diverse, ethical, and healthy workplaces, encouraging, challenging, and supporting all colleagues, customers, and partnerships will be our master plan.

02

Knowing that our FTTH infrastructure promotes social equality and equal opportunities in accessing communications services, avoiding rural exodus, attracting investment and prosperity for these regions. The second pillar is the communities around us and connects people in low-density areas.

03

dstelecom is conscious of the pressing global climate crisis and is committed to minimizing the environmental impacts of our business. The third pillar of our strategy will be driving environmental efficiencies to reduce dstelecom's carbon footprint.

04

dstelecom management and its employees will at all times demonstrate the highest levels of integrity, truthfulness, and honesty to uphold both personal and corporate reputations and to inspire confidence and trust in their actions. dstelecom will always conduct its business competently, fair, impartial, and efficient.

DSTELECOM STAKEHOLDER ENGAGEMENT

We are committed to working closely with all our internal and external stakeholders to achieve shared business goals that align with our core values. Constructive and effective stakeholder engagement, integral to our daily business activities, can improve our environmental, social, and corporate performance.



People and Culture

We consider our workers our first ESG Stakeholders because they work with Management on the definition of ESG Strategy and Priorities. Simultaneously, they should embody our ESG practices in all business activities and benefit from them.

A powerful team means a strong Culture.

We believe that a strong and consistent Organizational Culture drives our company's competitive edge! Our company culture is built on a sustainable mission, a clear vision, and founded, above all, on our Values and the team's DNA. We know, whether we plan for it or not, our Culture is being created every day. In our case, we have chosen to develop our own Culture.

DSTELECOM STAKEHOLDER ENGAGEMENT

We believe that the best way to ensure our success continues for many generations of technology and people is to have a robust, consistent, and coherent Organizational Culture. Hence, the importance we give to our people as they join us. Our strategy is to attract excellent people to help us create a Great Organizational Culture. Excellent people refer to those who share most of our genetic Code and values. It's imperative that everyone feels engaged and aligned with our dstelecom Culture.

At dstelecom, almost nothing is mandatory or irrevocable except sharing our Core Values. After that, our policies advocate responsible recruitment practices which are non-discriminatory and attentive to equal opportunities and diversity. dstelecom is a place where we believe that diversity makes us strong. Pursuing and promoting diversity and inclusion means exploring the most significant source of Innovation. This environment is also a highway to attract and retain the very best people at all levels. We recognize and value the breadth of human experience, and we work to celebrate it.

Then, to have happier people and build a Strong Culture, we work daily to foster an environment of openness, freedom, and responsibility. Our work environment creates conditions and encourages people to reveal their concerns, anxieties, or aspirations without fear. We are a company with open doors where frank dialogue between employees and leaders should be easy and natural. Our People are encouraged to take the initiative and risks. Everybody Knows that the requests for help are valued as signs of strength rather than weakness.



DSTELECOM STAKEHOLDER ENGAGEMENT

Communication is another critical pillar of our strategy. To everybody be constantly on the same page, through communications, general meetings, get-togethers, we continuously involved our team in informing and transforming our core values into actions.

We promote integrity and professionalism throughout the dstelecom and pride ourselves in leading by example, which we do by setting the right tone right from the top of our organization. We respect one another and each other's rights and customs. We strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company. To be coherent and fair, we work towards recruiting, employing, and promoting people only based on meritocracy, objective criteria, and the qualifications and abilities needed to perform the job.

We invest in training our workers and offer lifelong learning plans to ensure their ongoing professional and personal and development to assist them in realizing their full potential.

Knowing the importance to happiness and health of our workers, we promote a work-life balance attentively.

The sustainability of dstelecom's success will always depend on the happiness of its team and the solid and consistent Culture we will be able to develop. These are essential pillars of our ESG strategy and plan for those reasons.

DSTELECOM STAKEHOLDER ENGAGEMENT

COMMUNITY

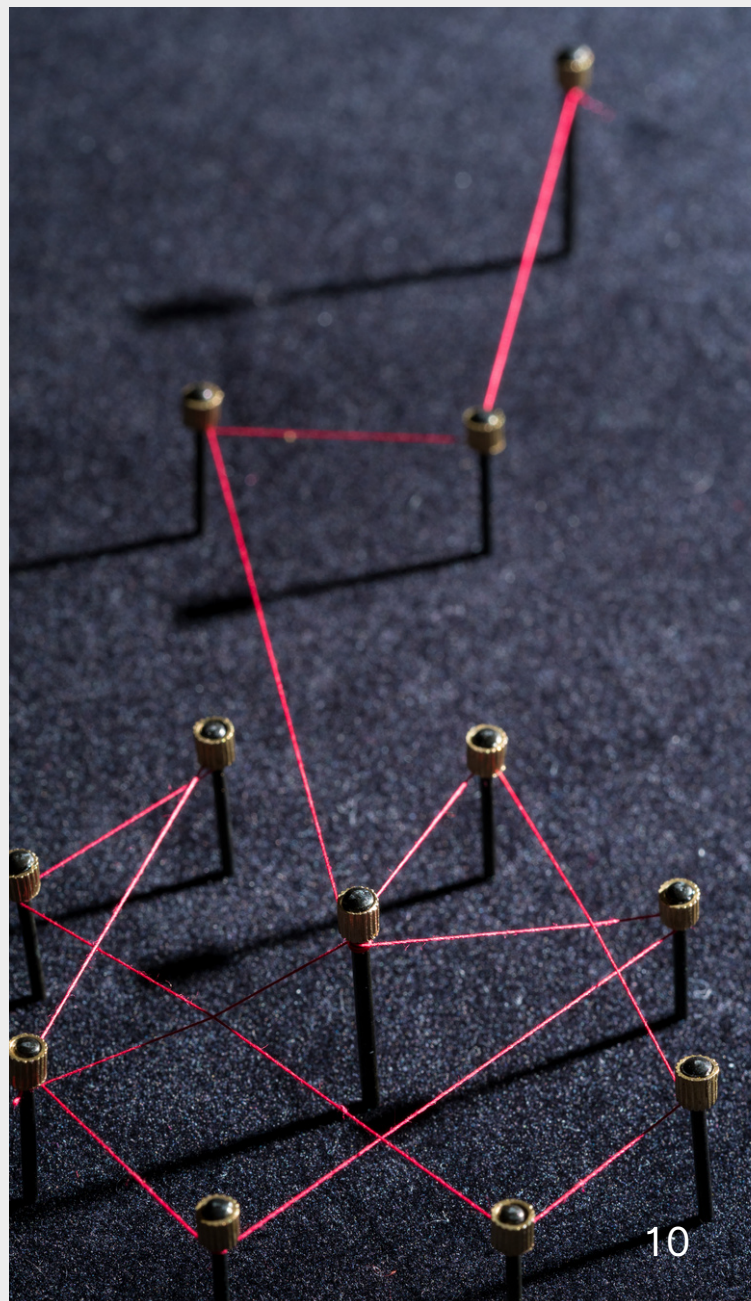
dstelecom is a wholesale-only operator. For the last decade, built, operates, and maintains the first and largest open, multi-operator fiber optics network, which already covers 600,000 houses across Portugal's most digitally underserved rural areas (100 municipalities - one-third of Portugal mainland).

What does it mean? Our core business has an implicit dimension of social responsibility in these underserved rural areas. Our infrastructure is the unique FTTH infrastructure in these regions. Before we built our infrastructure, the communities didn't have access to these Digital Highways in Low-Density

Areas and consequently didn't have access to high-speed telecommunications services.

Our FTTH infrastructure promotes social equality and equal opportunities in accessing communications services, avoiding rural exodus, attracting investment and prosperity for these regions. It ensures that final consumers in these rural areas have access to the same service portfolio and quality provided in urban areas. Enable tele-school and teleworking in rural areas and ensure an evolutionary alternative to the technological footprint that will be legacy in these areas with the appearance of 5G.

Our infrastructure, our business, has contributed to reducing the regional asymmetries of our country like no other infrastructure or public policies have done.



DSTELECOM STAKEHOLDER ENGAGEMENT

Dstelecom's contribution to socially and economically developing municipalities in which it operates (namely wealth creation, employment, investment attraction, technological development, and population retention) is highly valued by the local authorities and population. We brought them digitally closer to the world, and reduced digital exclusion contributed to those communities' inclusion and prosperity.

Connecting populations in those technologically deprived areas require extensive investments whose decision-making has not been and will not be made exclusively based on profitability. We have been working with local authorities to define priorities and create network infrastructures that interconnect referenced institutions and governmental entities of municipalities, such as Municipal Libraries, Museums, Schools, Pools, Firemen, Theaters.

This permanent work with these communities is one of the most important pillars of our ESG strategy and is integrated into our management systems.



DSTELECOM STAKEHOLDER ENGAGEMENT

CLIENTS

Looking externally to the market in general, our business policies regarding customers deserve particular care and attention. Throughout these years, we have been able to gain our clients' trust enabling us to coordinate which technological and strategic areas to develop new services and/or business areas. dstelecom's biggest asset is the trust that customers place in our company.

It's time to move to the next level. We believe that ESG issues will define the market approach, especially in the retention of customers. We have been taking steps to understand our clients' customers, be ethically aligned with their priorities and expectations, and consolidate a relationship of trust with our clients beyond a simple commercial exchange of high-quality services. With the business's evolution and taking advantage of social networking, we have been increasingly closer to our client's customers. That brings us enormous responsibility as well as tremendous opportunities.

Throughout these years, we have been able to gain our clients' trust enabling us to coordinate which technological and strategic areas to develop new services and/or business areas. dstelecom's biggest asset is the trust that customers place in our company.

Our team is committed to creating more conditions to intensify communication channels with our customers' clients, enabling us to support decisions that provide growth, increase final consumer satisfaction, and, consequently, our customers. On the other hand, it gives them visibility of our commitment to ESG factors.

We are deeply committed with our employees to the future that we will shape. Making the right environmental decisions in favor of sustainability, with a permanent integration into communities where we operate, reducing digital exclusion, contributing to those communities' inclusion and prosperity will be highly valued assets for our client's customers.



DSTELECOM STAKEHOLDER ENGAGEMENT

SUPPLIERS

We carefully select all suppliers and business partners to foster sustainability and social responsibility. Our choices go beyond analyzing technical and economic aspects of competitive proposals; we evaluate and value working conditions and respect for human rights.

All of these topics are clearly and crystal-clearly detailed in the Supplier Code of Ethics, and our suppliers and partners formally commit to comply. We will not enter into or maintain relationships with individuals or organizations engaged in or suspected of engaging in illegal activities or against our Code of Ethics.

We assume not to exclude partners by size or origin. On the contrary, we will privilege local partners and pay particular attention to smaller companies' economic and financial dependence, considered social policy.

We have an annual assessment of the reputation and compliance with our practices of Suppliers.

DSTELECOM STAKEHOLDER ENGAGEMENT

SHAREHOLDERS

ESG is a direct and necessary response to the issues created over the last half a century by certain portions of the corporate world adhering to a profit maximization philosophy at the expense of human, social and environmental capital. We have the opportunity, the power, and duty to help create lasting and ensure a positive impact and create a sustainable and more prosperous world.

Philosophical and moral considerations aside, a strong ESG value proposition is also a necessary tool to ensure long-term shareholder value.

The new standards for evaluating companies and businesses consider, beyond risk and return, a third dimension: impact. Impact on communities, the market, people, and the environment will determine the level of resilience and sustainability of the business and companies. Risk, Return, and Impact. Only by considering these three pillars together will we be able to discover the true investment potential and value of a company.

Top-line growth - Furthermore, a strong ESG proposition will help our company tap new markets and expand into existing ones. When governing authorities trust corporate actors, they are more likely to award them the access, approvals, and licenses that afford fresh growth opportunities. Additionally, ESG can also drive consumer preference. Some research has shown that customers say they are willing to pay to "go green."

DSTELECOM STAKEHOLDER ENGAGEMENT

Cost reductions - ESG can also reduce costs substantially. Among other advantages, executing ESG effectively can help combat rising operating expenses (such as raw-material costs and the actual cost of water or carbon).

Reduced regulatory and legal interventions -A stronger external-value proposition can enable companies to achieve greater strategic freedom, easing regulatory pressure. In fact, in case after case across sectors and geographies, we've seen that strength in ESG helps reduce companies' risk of adverse government action. It can also engender government support.

Employee productivity uplift - strong ESG proposition can help companies attract and retain quality employees, enhance employee motivation by instilling a sense of purpose, and increase productivity overall. Employee satisfaction is positively correlated with shareholder returns. The stronger an employee's perception of impact on the beneficiaries of their work, the greater the employee's motivation to act in a "prosocial" way.

That's why at dstelecom, we believe that a strong ESG proposition can create value directly and indirectly. It allows us to mitigate risks and develop opportunities positively impacting numerous indicators that measure our business success: shareholder value, profits, operating efficiency, customer attraction and retention, competitiveness, brand value, and innovation level.

All of these contribute to an extended bottom-line, which will be the fundamental basis for building and measuring the long-term value of a company. As Indra Nooyi, former chief executive of PepsiCo remarked in New York Times piece: "social responsibility, in the corporate context, is not about depriving shareholders of money earned by the company, but rather it's about how we make money a different way."

Continued commitment to high ESG standards is the best way for our shareholders to achieve their investment goals while at the same time ensuring that the environment and communities can benefit as well.

A CLOSER LOOK AT THE THREE PILLARS

ENVIRONMENT

Climate change is a reality.

Scientific evidence for the warming of the climate system is unequivocal. The current warming trend is of particular significance because it is unequivocally the result of human activity since the mid-20th century and proceeding at an unprecedented rate over millennia. It is undeniable that human activities have warmed the atmosphere, ocean, and land and that widespread and rapid changes in the atmosphere, ocean, cryosphere, and biosphere have occurred.

There is no question that increased levels of greenhouse gases must cause Earth to warm in response. The planet's average surface temperature has risen about 1.18 degrees Celsius since the late 19th century, a change driven largely by increased carbon dioxide emissions into the atmosphere and other human activities. Most of the warming occurred in the past 40 years, with the seven most recent years being the warmest.

The ocean has absorbed much of this increased heat. The top of the sea showing warming of more than 0.33 degrees Celsius since 1969. The global sea level rose about 20 centimeters in the last century.

But it is not just about temperature. Climate change brings multiple different changes in different regions, which will increase with further warming. These include changes to wetness and dryness, winds, snow and ice, coastal areas, and oceans.



A CLOSER LOOK AT THE THREE PILLARS

dstelecom is conscious of the pressing global climate crisis and is committed to minimizing the environmental impacts of our business. We acknowledge that our business activities affect the society and environment around us. We have the opportunity, the power, and duty to help create lasting and ensure a positive impact and create a sustainable and more prosperous world.

Policies and measures implemented have been recognized as an example in the environmental area by our Industry. We project and design our networks to reduce natural and energy resources consumption and cause a less ecological and visual impact.

Yearly, we invest resources to reduce energy consumption and switch to renewable energy sources. To reduce energy consumption, we have been replacing network equipment and air conditioning machines with more efficient equipment. We have been investing in studying other natural ways to cool our POP's using passive cooling solutions as geothermal energy as PCM (Phase Change Materials).

We reinforce our solar renewable power production program to our POP's every year. We reduce carbon emissions with Carsharing and the "I am a responsible driver" program. Inside dst campus, we use electric vehicles for our people's movements and visits.

We recycle and reuse materials, infrastructures, supports, and privileged buried infrastructures and do not use materials in ecological scarcity. The nature of our business - multi-operator infrastructure - while creating technical and economic synergies is, innately, an environmentally efficient business by avoiding duplicate infrastructures and materials.





A CLOSER LOOK AT THE THREE PILLARS

We create an Environmental Observatory to observe best practices in other industries and propose to Management the quick implementation of policies, measures, and investments to be maintained dstelecom leading and as a reference in the sector on this topic.

We have also implemented various sustainability measures across our offices, including recycling and waste sorting programs, water drums to eliminate bottled water usage, motion sensor lighting, and other energy-saving initiatives.

By embracing remote-working arrangements and technology, we have reduced the environmental footprint of our office spaces and lessened the need for many of our employees to commute and travel.

This document is a statement of ESG policy and principles and a formal commitment from our Management Team on behalf of the entire organization.

A CLOSER LOOK AT THE THREE PILLARS

SOCIAL

dstelecom is a Human-Centered company. We add "an empathy lens" to our strategy to help understand the wants and needs of people," specifically those experiencing and creating our services.

We are building our purpose around improving society. Improving our communities.

Our FTTH infrastructure promotes social equality and equal opportunities in accessing communications services, avoiding rural exodus, attracting investment and prosperity for these regions. It ensures that final consumers in these rural areas have access to the same service portfolio and quality provided in urban areas. Enable tele-school and teleworking in rural areas and ensure an evolutionary alternative to the technological footprint that will be legacy in these areas with the appearance of 5G.

We have been building and managing a Human-centered Culture at dstelecom. We are convinced that the best way to ensure our success continues for many generations of technology and people is to have a robust, consistent, and coherent Organizational Culture.



A CLOSER LOOK AT THE THREE PILLARS

A solid and consistent Organizational Culture drives our company's competitive edge! Our company culture is built on a sustainable mission, clear vision, and founded, above all, on our Values and the team's DNA. Hence, the importance we give to our people as they join us.

Excellent People are attracted to Great Cultures. Our strategy is to attract excellent people to help us create a Great Organizational Culture! Our workers are our best promoters. To attract and retain excellent people, we design a "welcome aboard program" to integrate and make them feel safe and happy just from the beginning; we foster an array of backgrounds and perspectives and create opportunities for every dstelecom worker to feel engaged and heard.

One pillar of our Culture is diversity. We believe that diversity makes us strong. We believe in the power of diversity. We recognize and value the breadth of human experience, and we work to celebrate it.

We pursue and promote diversity and inclusion because, for us means to explore the most significant source of Innovation. This environment is also a highway to attract and retain the very best people at all levels. We respect one another and each other's rights and customs. We strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company.



A CLOSER LOOK AT THE THREE PILLARS

GOVERNANCE

We believe and defend business ethics as the heart of corporate governance. Honesty, trust, transparency, and fairness are core values in dstelecom. We strongly believe that the success of our business is dependent on the trust and confidence we earn from our employees, customers, and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals solely through honorable conduct.

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We put in place measures and procedures (Employees Ethics Code of Conduct, Suppliers Code of Conduct) to protect the reputation of the dstelecom and everyone who works with us and refrain from dealing with any third-party associated with organizations or countries restricted law or sanctions.



A CLOSER LOOK AT THE THREE PILLARS

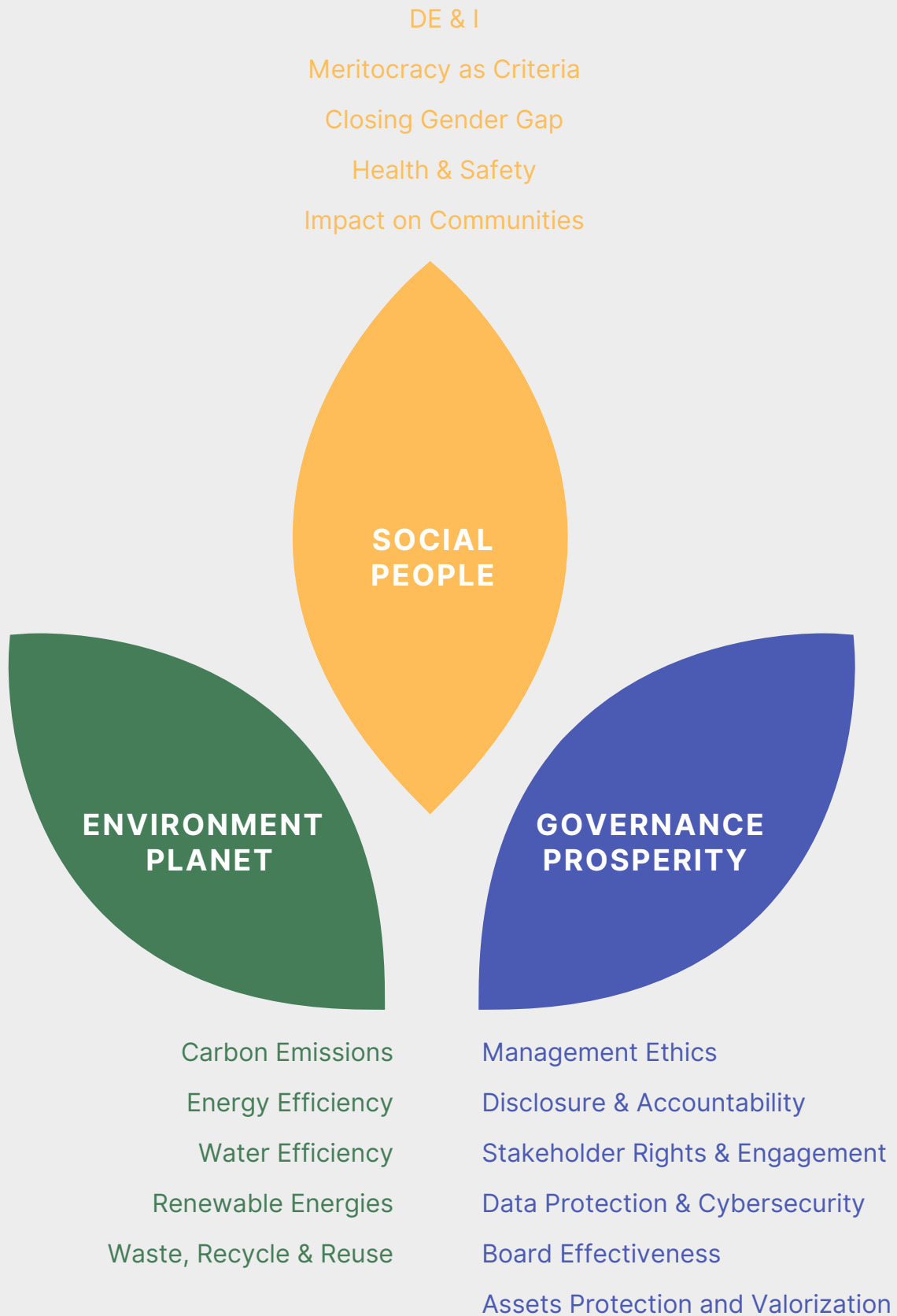
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dstelecom is fully committed to sound corporate governance principles. We strive to have a transparent, fair, and professional dialogue with our employees, business partners, and shareholders. Internally, we value our transparent relationship and equal dealings with our shareholders to ensure equitable sharing of accurate information.

We are committed to investing responsibly, which requires incorporating ESG factors into all investment decision-making and active ownership of our assets.

ESG GOALS



DSTELECOM ESG ROAD MAP

ENVIRONMENT

PLANET



01

We defined a clear environmental policy and implemented and certified an environmental management system. We continuously involve and commit the whole company with formal and, where possible, quantitative objectives based on the norm NP ISO 14001: 2015.

02

Actively promote developing processes and procedures that cause lower environmental impact by prioritizing environmental protection and continuously providing customers, suppliers, and all interested parties information regarding the dstelecom management system and ecological practices adopted.

03

Responsibly consuming natural and energy resources, reducing the use of hazardous products, and polluting waste products are the basis of our business life cycle (design, procurement, construction, maintenance, and operation).

04

Reducing our carbon footprint by decreasing the energy consumption of our activities through implementing new initiatives in our networks and their operations and by favoring energy consumption from renewable and local energies

DSTELECOM ESG ROAD MAP

ENVIRONMENT PLANET

05

Identify and systematically monitor the risks and environmental aspects associated with our activity.

06

Ensure compliance with the legal requirements and standards applicable to the business and the environmental management system.

07

Identify, Evaluate and Monitor indicators that allow implementing measures to mitigate possible climatic impacts of our economic activity.

08

Given the highly sensitive ecological framework of the areas where we mainly develop our activity, we assume increased responsibility in preserving nature and the environment.

DSTELECOM ESG ROAD MAP

SOCIAL PEOPLE

01

Ensure responsible, non-discriminatory, and equal opportunity recruitment practices and diversity in our non-discriminatory and comprehensive recruitment process.

02

Formally and publically commit to a policy of transparency, which circulates to all those whom one day wish to become part of a dstelecom - our Value Proposition for Employee candidates.

03

Integrate with dignity and care all new collaborators; facilitate their integration by creating the best possible conditions according to our Welcome Aboard Manual and Buddy Program

04

Foster an inclusive work environment. Diversity, respect, and inclusion are our core values. We actively respect diversity, whatever its nature, and we value it as a factor driving growth and business innovation.

05

Respect and uphold respect within all employees, promoting professional development and skills, fostering a transparent relationship, and a culture of dialogue.

06

Implement reconciliation policies that ensure the balance between work and family life.

DSTELECOM ESG ROAD MAP

SOCIAL PEOPLE

Health & Safety & Wellbeing @ WORK

- Identify, evaluate, and control existing risks in the activity and business and employees' safety and health by increasing protection levels through continuously improving our preventive measures, injury prevention, and occupational risk mitigation.
- Involve employees in identifying hazards, risk assessment, and prevention by providing training associated with occupational safety and health risks and organizing drills to test emergency response capacity.
- Protect employee health by promoting annual health checkups by qualified professionals available in our health center onsite
- Encourage employees to lead a healthy life, including exercise and healthy diets, and support their participation in programs to prevent and treat addictions.
- Increase employees' quality of life, sense of ownership, and sharing of our core values by providing employees a range of services in the workplace (Restauration, sports facilities, medical services, convenience services, etc.), by organizing and encouraging team-building events and the active participation of employees in shaping the future of dstelecom (Innovation Factory)
- Ensure the air quality in the workspace by mitigating the onset of disease.
- Comply and enforce compliance with national and international labor legislation.
- Maintain our infrastructures with the best security conditions, prioritizing the safety of the users and communities in which we operate.

DSTELECOM ESG ROAD MAP

SOCIAL PEOPLE

Communities

- Continually support the economic and social development of the communities where we operate by developing policies and practices of social responsibility, contributing to wealth creation, social equality, and improving people's wellbeing, mitigating the risk of info-exclusion.
- Guarantee the quality and adaptability of our services in the communities where we are located.
- Communicate actively the availability of services and coverage in the communities where we are inserted.
- Be an active partner with communities in the territories where we are present with solutions that aim to increase the quality of life and citizens', hence reducing the costs of services, safeguarding environmental and ecological sustainability, and developing intelligent, secure mobility while attracting investment securing the population.
- Service Sponsorships provide connectivity and support for community events.
- Stimulate business volunteering within regular working hours and consider our employees' availability.
- Ensure that our people management policy allows employees time off to carry out voluntary work with communities, mainly non-profit organizations. This time off usually goes from one day a month to a week a year while safeguarding specific circumstances that can exceed this time, such as volunteer firemen.
- Publicly recognize all our employees for volunteer work. We map out our employees' interests and activities, especially in volunteering. Monitoring their extra-company volunteering activities, we strive to highlight our volunteers' exceptional performance and activities on our website and our social network as a way to recognize, stimulate and mobilize other employees to follow.

Supply Chain

- Identify and monitor supply chain risks associated with its activities;
- Communicate the Supplier Code of Conduct externally to suppliers, notably ensuring they comply with environmental as well as social standards (ILO).

DSTELECOM ESG ROAD MAP

GOVERNANCE PROSPERITY

01

Identify and monitor the most relevant ESG issues for dstelecom, considering our context and specific business activities.

02

Strengthen, design, and implement policies and measures that consolidate our environmental, social, and governance concerns.

03

- Communicate effectively and rigorously with all the company's stakeholders (Employees, Clients, Clients, Suppliers, Local Management Agents, Shareholders, Regulators)

04

Aid and support the person in charge of the ESG Program's Management and governance.

05

Stimulate the team and create processes to adopt Innovation as an accelerator of progress.

06

Incorporate continuously in our policies the most current best practices.

07

Respect the Company Values.

DSTELECOM ESG ROAD MAP

GOVERNANCE PROSPERITY

Ethics

- Identify and monitor ethical business risks associated with activities.
- Please comply with all applicable laws and regulations and adhere to the highest conduct and business practices, as defined in our Code of Ethics and Conduct.
- Disclose our Code of Ethics and Conduct and any subsequent changes made to all Employees.
- Incorporate all principles in our business practices and supplier contracts defined in the dstelecom's Supplier Conduct Code.
- Value and foster employees to interact with clients, business partners, and colleagues respectfully and ethically at all times.
- Encourage the responsible use of Social Networks while condemning any abuse and use of false advertising, publicity, or false news.
- Implement all necessary measures to ensure a work environment free from discrimination and harassment of any kind.
- Implement all necessary GDPR measures to guarantee access to personal data only to those authorized to perform their function or activity. Ensure processes and tools allow personal data destruction when no longer needed.
- Treat competition with respect and dignity.



DSTELECOM ESG ROAD MAP

GOVERNANCE PROSPERITY

Transparency

- Ensure timely and accurate disclosure to interested parties (Employees, Clients, Suppliers, Regulator, and Shareholders) in all material matters relating to the company, including our financial situation, performance, ownership, and governance.
- Honor our transparency commitment to our customers in managing an open and shared telecommunications network.

Bribery & Corruption

- Act according to all relevant laws and regulations against bribery and corruption.
- Condemn all attempts by any employee to bribe or be bribed to customers, suppliers, public officials, and/or business partners.
- Refuse offers from third parties could be considered an attempt to influence dstelecom or employees. In case of doubt, the employee should communicate the situation, in writing, to the respective leader.
- Create conditions for and encourage employees who wish to anonymously report any attempt of bribery and/or corruption to the Management team and/or Board of Directors.



DSTELECOM ESG ROAD MAP

GOVERNANCE PROSPERITY

Equality & Freedom

- Treat shareholders equally, ensuring equal access and accuracy in the available information.
- Guarantee that our customers and potential customers enjoy a business model that sustains equidistance, neutrality, and total independence regarding our decision-making principles.

Conflicts of interest

- Invite collaborators to avoid all situations involving conflicts of interest, which are defined as situations in which the employee's unbiased and impartial judgment is conditioned by personal, economic, political, and other considerations.
- Encourage collaborators to report any potential conflicts of interest to the Management team and/or Board of Directors.

Protecting Company Assets

- Encourage employees to proactively protect company assets to the best of their ability, including but not limited to physical, intellectual, electronic, or digital assets.
- Implement procedures that safeguard our employees' strict compliance with the company's confidentiality requirements.
- Adopt necessary protective measures to guarantee our infrastructures' integrity and appropriate use.

