



dstelecom

GOVERNANCE POLICY

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Policy and processes

At dstelecom we are committed in addressing all market needs with an innovative solution. Always focused in the transparency of our business model and aiming to create value, dstelecom applies the best management practices.

dstelecom's governance takes into consideration, transparency, stakeholder engagement, shareholder engagement, climate change, legal compliance and gender diversity.

At dstelecom we are committed to strengthen, design and implement policies and measures that consolidate environmental, social and governance concerns. We seek to communicate, in a transparent, effective and rigorous manner, with all our stakeholders, namely, workers, clients, clients of our clients, suppliers, shareholders, regulators, governmental entities and the community.

We encourage our teams to create innovation-oriented processes as an accelerator of progress and continuous improvement. In a natural and continuous way, we incorporate the market best practices in our policies.

Finally, all stakeholders, are involved and informed, consequently maintaining the respect and the alignment with the company values.

BUSINESS ETHICS

1. Implementation and promotion of measures, with our workers, suppliers and business partners;
2. Identification and monitorization of social and governance risks associated with our business;
3. Compliance with the laws and regulations applicable to dstelecom and compliance with the highest standards of conduct and business practices, as defined in our Code of Ethics and Conduct;
4. Descosture of our Code of Ethics and Conduct with employees, with updates whenever necessary;
5. Incorporation of commercial practices and contracts with suppliers all the principles defined in dstelecom's Supplier Code of Conduct;
6. Valorisation and encouragement of the workers to interact with clients, business partners and colleagues in a respectful and ethical manner at all times;
7. Implementation of measures to ensure a work environment free from discrimination and harassment;
8. Implementation of all necessary measures to guarantee the protection of personal data from our workers suppliers and customers;
9. Implementation of processes and tools that allow the destruction of personal data when not needed;
10. Treatment of all competitors with respect and dignity.





WHAT WE DEFEND

01 **Transparency**

At dstelecom we assure that all issues related to the company, such as: financial situation, technical, environmental, social and governance, are communicated to our stakeholders in a totally transparent way. Transparency is in the dstelecom's DNA, so we honour our commitment to our customers in the management of a multi-operator network.

02 **Equality**

We implement and promote measures that guarantee equal rights to all workers. We guarantee that all our shareholders have equal access to all the information provided. We maintain the same spirit with regard to customers and potential customers, providing a business model that supports equality, neutrality and complete independence from our decision-making principles.

03 **Consensus**

At dstelecom decisions are made based on the requirements and involvement of our relevant stakeholders.

04

Efficiency and sustainability

In dstelecom's DNA we keep focus on efficiency and sustainability, in the protection of the environment and global climate change. dstelecom promotes and implements measures, processes and procedures that cause the least impact on the environment, thus allowing us to grow in a sustainable and differentiating way. We nurture innovation and continuous improvement in the consumption of natural and energy resources and in the production of waste. With this in mind, dstelecom certifies and maintains our quality, environment, safety and health management system at European benchmarks, ensuring the implementation and compliance of the market best practices.

WHAT WE DEFEND

05

Responsibility

Responsibility is in our DNA. We promote a culture of open and transparent communication so that all workers perform their duties responsibly, assuming and correcting mistakes and growing professionally in an effective, efficient and responsible manner.

06

Involvement

We promote the involvement of all workers, regardless of department or role. We promote regular meetings with the first and second lines of the departments, in the sense that we are all in tune. On the other hand, we challenge our workers to participate in innovation projects, regardless of area or hierarchical level.

07

Bribery and Corruption

At dstelecom we comply with legislation and regulations against bribery and corruption. We condemn all attempts to bribe customers, suppliers, government workers and business partners by our workers. By the same principle, we refuse offers from third parties that could be considered an attempt to influence dstelecom or workers. In case of doubt, the worker always communicates the situation to his supervisor. At the same time, we create conditions for our employees, if they wish, to anonymously report any attempt at bribery or corruption, to do so with the management team or the Board of Directors.

08

Conflitos de interesse

We encourage our employees to avoid all situations that involve conflicts of interest, encouraging them, if any, to report possible events to the management team or the Board of Directors.

