

DIVERSITY, EQUALITY AND INCLUSION POLICY

Cyprus Telecommunications Authority
Cyta

TABLE OF CONTENTS

1. INTRODUCTION 3
2. DEFINITIONS 3
3. PURPOSE 4
4. SCOPE OF APPLICATION 4
5. LEGAL FRAMEWORK 5
6. POLICY DIRECTION 7
7. CYTA`S COMMITMENTS TO TAKE ACTIONS 7
8. CYTA`S COMMITMENTS TO TAKE ACTIONS CONCERNING CUSTOMERS 8
9. ROLES AND RESPONSIBILITIES 9
   - 9.1 Personnel 9
   - 9.2 Management 9
   - 9.3 Chairperson and Board Members 10
10. COMPLIANCE AND SANCTIONS 10
11. TRAINING AND AWARENESS RAISING 10
12. COMMUNICATION AND COMMITMENT 10
13. PRIVACY 10
14. COMMUNICATION 11
15. COMPLAINTS/WHISTLEBLOWING PROCEDURE 11
16. MONITORING AND REVIEW 12

ANNEX A – LGBTQI+ DEFINITIONS 13

1. INTRODUCTION

Cyta is committed to promoting diversity, equality and inclusion in all aspects of its activities.

We believe that a diverse workforce, comprising individuals with varied backgrounds, experiences, and perspectives, is essential to our success as an Organization. We also believe that every individual should be treated with respect and dignity and should have the opportunity to fully realize their potential, regardless of race, nationality, ethnicity, social and economic background, professional skills, religion, gender, sexual orientation, age, abilities, or any other personal characteristic.

To this end, we have developed our Diversity, Equality and Inclusion Policy to outline our commitment to diversity, equality and inclusion and to provide guidance to all employees on how to promote and maintain these values in the workplace.

2. DEFINITIONS

"Authority or Cyta or Organization" means the Cyprus Telecommunications Authority.

"Diversity" means the range of differences between people, including, but not limited to, a person's race, belief, gender, gender stereotypes, pregnancy, sexual orientation, gender identity or expression, religion, religious beliefs, national origin, ethnic origin, ancestry, marital status, mental or physical disability, political opinion or activity, military or veteran status, citizenship, genetic information, medical condition or any other protected status.

"Equality" means treating all people fairly, equally and respectfully, regardless of their differences.

"Inclusion" means creating an environment where everyone feels welcome, respected and valued, and where the inherent worth and dignity of all people is recognised.

“LGBTQI+” refers in detail to the definitions provided in Annex A.

"Monitoring and Review Committee" means the Committee responsible for monitoring the implementation of the Policy, identifying areas for improvement and making recommendations for change.

"Personnel" means all employees of the Authority, both monthly salaried and hourly paid Personnel.

"Policy" means the Diversity, Equality and Inclusion Policy.

3. PURPOSE

Our commitment to diversity, equality and inclusion is based on our belief that it is not only the right thing to do, but also essential to Cyta's success. We recognize that a diverse and inclusive workplace fosters the creativity, innovation and collaboration that are critical to our ability to meet the needs of our customers and compete effectively in the marketplace.

Our goal is to create a work environment where everyone feels valued and respected, and where their unique perspectives and experiences are used to drive our collective success. We aim to achieve this by fostering a culture that celebrates diversity, promotes equality and encourages inclusion in all aspects of our organization.

We recognize that fostering diversity, equality, and inclusion is a continuous process. We are committed to regularly reviewing and enhancing our policies, practices, and programs to ensure alignment with our values and responsiveness to the evolving needs of our Personnel, customers, and society.

We are committed to maintaining a workplace free from discrimination and harassment and to providing equal opportunities for all Personnel. We believe that compliance with the applicable laws and regulations is essential to achieving this goal and promoting a culture of diversity, equality and inclusion at Cyta.

4. SCOPE OF APPLICATION

This Policy applies to all Personnel, including full-time, part-time, temporary and contract employees, volunteers and other persons working on behalf of

Cyta, including those working in other locations and countries, as well as all Cyta customers, stakeholders, and partners.

We believe that everyone has a role to play in promoting diversity, equality and inclusion and we are committed to ensuring that these values are reflected in all aspects of our business.

Our commitment to diversity, equality and inclusion extends to all areas of employment, including, but not limited to, recruitment, promotion, training and development, performance management, remuneration, benefits and dismissal. We also expect our Personnel to support these values in their interactions with each other, customers, partners and the wider community.

Our commitment to LGBTQI+ inclusion and equality extends beyond our workforce and encompasses all Cyta customers and partners. We strive to provide an inclusive and welcoming environment for everyone, regardless of their sexual orientation, gender identity, gender expression, or sex characteristics. This Policy guides our interactions with our customers and partners, ensuring that everyone is treated with respect, dignity, and equality.

We recognise that the different needs and experiences of our Personnel, partners and customers, may require different approaches and solutions and we are committed to taking a flexible and inclusive approach to ensure that everyone is treated with respect and dignity and has an equal opportunity to succeed.

5. LEGAL FRAMEWORK

At Cyta, we recognize that promoting diversity, equality and inclusion is not only a matter of ethical responsibility but also a legal obligation. As such, we are committed to complying with all relevant laws and regulations related to diversity, equality and inclusion in the Republic of Cyprus, the European Union and under international law.

Indicatively, the main legal provisions applicable to Cyta in relation to this Policy include the following:

i. The Combating Racial and Other Discrimination (Commissioner) Law 2004 [Law 42(I)/2004].

ii. The Equal Treatment (Racial or Ethnic Origin) Law of 2004 [Law 59(I)/2004].

iii. The Equal Treatment of Men and Women (Access to Goods and Services) Law of 2008 [Law 18(I)/2008].

iv. The Equal Treatment in Employment and Labour Law of 2004 [Law 58(I)/2004] and the Employment Equality Directive (2000/78/EC).

v. The Equal Treatment of Men and Women in Employment and Vocational Training Law of 2002 [Law 205(I)/2002]. Regulatory Administrative Act 176/2009, Regulations of 2009 Concerning the Provision of Independent Assistance to Victims of Discrimination and the Gender Equality Directive (2006/54/EC).

vi. The Equal Pay for Equal Work or Work of Equal Value Between Men and Women Law of 2002 [Law 177(I)/2002].

vii. The Part-Time Work Employees (Prohibition of Discriminatory Treatment) Law of 2002 [Law 76(I)/2002].

viii. The Fixed-Term Work Employees (Prohibition of Discriminatory Treatment) Law of 2003 [Law 98(I)/2003].

ix. The Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights of the United Nations.

x. The European Convention on Human Rights (ECHR).

xi. The Charter of Fundamental Rights of the European Union (CFR).

These laws and legal instruments, amongst others, prohibit discrimination on the basis of gender, race, ethnicity, religion, age, sexual orientation, disability and other protected characteristics.

At Cyta, we comply with all applicable laws and regulations relating to diversity, equality and inclusion, taking guidance from the relevant bodies. We also ensure that our Policies and practices are aligned with the principles of these laws and regulations.

We provide training for Personnel to ensure that they are aware of their legal obligations in relation to diversity, equality and inclusion. This training provides guidance on how to identify and address discriminatory behaviour and to promote a culture of respect and inclusion in the workplace.

Any breach of this Policy and/or relevant laws and/or regulations relating to diversity, equality and inclusion shall constitute a disciplinary offence and may result in disciplinary or other measures.

6. POLICY DIRECTION

6.1 Cyta respects and promotes the human rights of all its Personnel and to this end maintains and implements a Diversity, Equality and Inclusion Policy in accordance with current international standards for such policies and within the limits set by the Law.

6.2 Cyta respects diversity in all its forms and is committed to creating a workplace that values and celebrates diversity. To this end, Cyta has adopted this Policy by which it expresses its intention to demonstrate zero tolerance of incidents and actions where diversity in all its forms is not respected. Through the adoption and implementation of this Policy, we aim to create a supportive and inclusive environment for all Personnel, including LGBTQI+ employees, customers, partners, and members of the public, and to actively address and prevent all forms of discrimination or harassment.

7. CYTA`S COMMITMENTS TO TAKE ACTIONS

7.1 All Personnel are expected to uphold our commitment to diversity, equality and inclusion in the workplace. In particular, they are expected to:

i. Treat all colleagues, customers, partners and citizens with respect, dignity and fairness.

ii. Avoid any language or behaviour that is discriminatory or offensive.

iii. Immediately report any incidents of discrimination or harassment to their superior or to the relevant Directorate, namely, the Human Resources Management Directorate, or in accordance with Cyta's Whistleblowing Policy.

iv. Actively participate in training and education related to the implementation of Cyta's Diversity, Equality and Inclusion Policy.

v. Take action to create an inclusive and welcoming environment for all employees and customers.

7.2 We will provide programmes and support resources to any group considered to require empowerment, such as women, individuals living in remote areas, persons with disabilities, and LGBTQI+ Personnel. These initiatives will include, but are not limited to:

i. Appointment of a DE&I Officer (Diversity, Equality and Inclusion Officer) who will oversee the implementation of the Policy.

ii. Establishment of an Interdepartmental Team responsible for monitoring the implementation of the Policy, working in collaboration with the DE&I Officer.

iii. Creation of a network of individuals, both within and outside the LGBTQI+ community, which will be provided with adequate resources and opportunities to address relevant issues.

iv. Provision of guidance and mentoring by experts in the field.

v. Immediate action to address and remedy any cases of discrimination.

7.3 The use of non-inclusive language and communication will be avoided in order to reduce the development and perpetuation of a non-inclusive work environment.

8. CYTA`S COMMITMENTS TO TAKE ACTIONS CONCERNING CUSTOMERS

At Cyta, we are committed to providing excellent service to all customers, regardless of race, nationality, gender, age, ability, religion, sexual orientation or any other characteristic.

In particular:

i. We treat all customers with respect, dignity and fairness.

ii. We provide accessible and fair services to all customers.

iii. We avoid any language or behaviour that is discriminatory or offensive.

iv. We deal promptly with any complaints or concerns about discrimination or harassment.

9. ROLES AND RESPONSIBILITIES

Promoting diversity, equality and inclusion is a shared responsibility of everyone at Cyta, of the Board, the Management and the Personnel of the Organization.

To ensure that everyone is aware of their roles and responsibilities, the following guidelines are provided:

9.1 Personnel

All Personnel are expected to contribute to the promotion of diversity, equality and inclusion in the workplace. This includes treating all colleagues and customers with respect and dignity, avoiding discriminatory language or behaviour and actively promoting a culture of inclusion.

9.2 Management

Managers play a key role in promoting diversity, equality and inclusion. They are expected to lead by example, set clear expectations for their subordinates and provide a safe and respectful working environment. They should also be aware of the different needs and experiences of members of their Departments and take appropriate action to meet those needs. Furthermore:

i. The Chief Executive Officer is responsible for the overall implementation of and compliance with this Policy across Cyta.

ii. The Human Resources Management Directorate is responsible for ensuring the effective communication and implementation of the Policy, as well as for providing support to any group identified as requiring empowerment—for example, women, individuals living in remote areas, persons with disabilities, and LGBTQI+ Personnel.

iii. The Senior Commercial Management Division is responsible for ensuring that all Personnel who serve/interact with customers are appropriately trained and fully informed of the rights and issues addressed by the Policy, and are able to provide comprehensive and respectful service, regardless of individual characteristics or any form of diversity.

9.3 Chairperson and Board Members

Board Members play a critical role in setting the Policy and direction for Cyta's diversity, equality and inclusion efforts. They are expected to demonstrate a strong commitment to these values, allocate resources to support diversity initiatives and hold themselves and Cyta Management accountable for adherence to these principles.

10. COMPLIANCE AND SANCTIONS

Cyta maintains a strict commitment to compliance with the Policy. Any member of Personnel found to be in violation of the Policy may be subject to disciplinary action. Furthermore, all complaints of discrimination or harassment will be investigated promptly, and all appropriate measures will be taken to address any breaches of the Policy.

11. TRAINING AND AWARENESS RAISING

Cyta is committed to providing ongoing training and awareness to its Personnel on issues related to diversity, equality and inclusion. This includes training on unconscious bias, cultural competency and harassment prevention, as well as providing resources and support for employees who have experienced discrimination or harassment.

12. COMMUNICATION AND COMMITMENT

We undertake to communicate our commitment to diversity, equality and inclusion to all parties concerned, including Cyta Personnel, customers and partners. This includes regularly sharing information about our diversity initiatives, promoting awareness of our Policies and procedures and fostering a culture of open communication and dialogue.

13. PRIVACY

At Cyta, we recognise the importance of protecting the privacy of all our employees and customers, including those who identify as diverse. We are therefore committed to fully complying with the relevant applicable laws and regulations when collecting, using, storing and/or processing any personal

data that we collect, in accordance with strict internal procedures that we adhere to.

14. COMMUNICATION

We recognize the importance of clear and effective communication to promote diversity, equality and inclusion at Cyta and with our customers, and we are committed to promoting open and transparent channels of communication. We undertake to communicate this Policy to all our Personnel and Customers and to make it readily available on our website and in other appropriate formats.

In order to ensure effective communication, we undertake the following commitments:

i. To provide training and resources for effective communication, including active listening, conflict resolution and cultural sensitivity.

ii. To encourage open and honest communication between Personnel, Management, customers and partners.

iii. To provide channels for customers to contact us, such as telephone, email and a system for reporting misconduct.

iv. To ensure that all communication channels are accessible and available to customers with disabilities.

15. COMPLAINTS/WHISTLEBLOWING PROCEDURE

Cyta has adopted a Whistleblowing Policy for Personnel, customers and partners who, inter alia, have concerns about discrimination or harassment based on diversity. The Whistleblowing Policy provides a fair and confidential procedure for addressing such concerns and for taking appropriate action to resolve issues and to prevent their recurrence in the future.

16. MONITORING AND REVIEW

At Cyta, we are committed to monitoring and regularly reviewing the Diversity, Equality and Inclusion Policy to ensure that it remains up to date and effective. The Policy shall be reviewed in accordance with the approved Policy Review Framework and updated periodically, as required by organisational and/or operational needs.

To support this review process, we are committed to establishing a Monitoring and Review Committee composed of representatives from various departments. The Committee will be responsible for monitoring the implementation of the Policy, identifying areas for improvement and making recommendations for change.

We are also committed to conducting regular surveys among our Personnel, customers and partners, to ensure that our Policies and practices meet their needs and expectations.

Finally, we will ensure that all Personnel members are aware of the monitoring and review processes and are encouraged to provide feedback and suggestions for improvement. We believe that this continuous improvement process is essential to promote Diversity, Equality and Inclusion at Cyta.

ANNEX A – LGBTQI+ DEFINITIONS

For the purposes of awareness and for the application of this Policy referring to members of the LGBTQI+ Community (Lesbian, Gay, Bisexual, Trans, Queer, Intersex and others), the following internationally recognized definitions apply:

- **Lesbian (or Gay Woman):** A woman who is sexually and/or emotionally attracted to women (ILGA-Europe[1]).

- **Homosexual (or Gay Man):** A person who is sexually and/or emotionally attracted to individuals of the same sex. Traditionally refers to men, though other people attracted to the same or multiple genders may also define themselves as gay (ILGA-Europe[2]). In this Policy, the term homosexual/gay is used exclusively when referring to men attracted sexually and/or emotionally to men.

- **Bisexual:** A person who experiences sexual and/or emotional attraction to more than one gender (ILGA-Europe[3]). This corresponds to the "B" in the acronym LGBTQI+. As noted by the HRC, this attraction may not necessarily occur simultaneously or in the same way and intensity. The term is sometimes used interchangeably with "pansexual."

- **Trans (or Transsexual or Transgender):** An umbrella term for individuals whose gender identity differs from the sex assigned to them at birth. It includes a wide range of gender identities such as trans man, trans woman, non-binary, agender, genderqueer, genderfluid, etc. (TGEU 2016 July 4th).

- **Queer:** A term inclusive of individuals who are not heterosexual and/or cisgender. It includes lesbians, gay men, bisexuals, trans, and intersex individuals. The term is often used to express a spectrum of identities and orientations that challenge mainstream norms. "Queer" is used as an umbrella term to encompass people who do not identify strictly as straight and those with non-binary or expansive gender identities. Queer theory challenges heteronormative social norms related to gender and sexuality, asserting that gender roles are socially constructed. Although historically the term "Queer" was used as a slur and may still carry negative connotations for some, many LGBTQI+ individuals have reclaimed the term as a symbol of pride (ILGA-Europe[4]).

[1] ILGA-Europe, Glossary, https://www.ilga-europe.org/about-us/who-we-are/glossary/
[2] See note 1
[3] See note 1
[4] See note 1

- **Intersex:** A person whose sexual anatomy or chromosomes do not fit typical binary definitions of male or female. This refers to individuals born with sex characteristics that do not belong exclusively to male or female categories, or may belong to both. The term "intersex" represents the range of naturally occurring variations in sex characteristics in humans and reflects the understanding that sex exists on a spectrum (Ghattas[5]).

The "+" in the LGBTQI+ acronym includes other individuals who self-identify as part of the community and may refer to (but are not limited to):

- **Asexual:** A person who experiences no or very little sexual attraction. Asexuality is an inherent part of who they are. Each asexual person may experience relationships, attraction, and arousal differently. Asexuality includes a spectrum of identities referring to individuals who experience little or no sexual attraction. It includes identities such as: Asexual, Graysexual (those who experience sexual attraction but to a much lesser degree than non-asexual individuals), and Demisexual (those who experience sexual attraction only after forming a strong emotional bond with another person).

- **Pansexual / Omnisexual:** Individuals who experience romantic, sexual, or emotional attraction to people regardless of gender identity (LGBTQIA Resource Center – University of California/Davis campus[6]).

- **Questioning:** The personal process of exploring one's own gender identity, gender expression, and/or sexual orientation. Some individuals may also use this term to describe their identity within the LGBTQI+ community (LGBTQIA Resource Center – University of California/Davis campus[7]).

[5] Ghattas, Dan Christian, "Standing Up for the Human Rights of Intersex People – How can you help?", 2015, https://ilga-europe.org/files/uploads/2022/04/Standing-up-human-rights-intersex-people.pdf
[6] LGBTQIA Resource Centre, Glossary, https://lgbtqia.ucdavis.edu/educated/glossary
[7] See note 6