

HUMAN RIGHTS POLICY

Cyprus Telecommunications Authority
Cyta

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1. INTRODUCTION

The Cyprus Telecommunications Authority recognizes that respect for human rights is a core value guiding its activities.

In line with the ideals of the Authority, we aim to contribute in a way that enables the protection and promotion of fundamental human rights and freedoms and supports the realisation of socio-economic development. We recognize that our success is based on our high standards of quality, integrity and excellence and our absolute respect for human rights.

Recognizing and wishing to avoid the possibility of having a negative impact on human rights in our area of operations, either directly or through our business partners, and as required by the Organization's Code of Governance, this Policy sets out the framework by which Cyta wishes to manage its relationships with its Personnel, its customers and the wider community, seeking to ensure the respect, protection and promotion of fundamental human rights, both internally and externally within its sphere of influence.

Bearing in mind that no policy can encompass and cover all specific situations, all persons bound by this Policy must responsibly adhere to the principles set out herein, using their good professional judgement.

Personnel can and are encouraged to contact their superiors and/or the Labour Relations, Benefits and Health Directorate for guidance on the implementation of the Policy.

2. DEFINITIONS

“Affiliated Entities” means the Authority's Funds (e.g. Pensions and Grants Fund of the Personnel of CYTA etc.), subsidiaries and companies in which the Authority has a majority shareholding and/or majority and/or control of the Board of Directors, including those based overseas (but for which adaptation may be required for individual issues due to the local regulatory framework), sub-contractors, advisors, agents, partners, representatives and suppliers of the Authority or Affiliated Entities.

“Authority” or “Cyta” or “Organisation” means the Cyprus Telecommunications Authority.

“Board” means the Board of Directors of the Authority, as appointed from time

to time.

“Human Rights and Freedoms” means the Fundamental Rights and Freedoms contained in Part 2 of the Constitution of the Republic of Cyprus and any other rights recognised and protected by the Republic of Cyprus.

“Policy” means this Human Rights Policy as amended from time to time.

“Secretary” means the Secretary of the Authority, as appointed from time to time.

“Personnel” means all employees, monthly salaried personnel, hourly paid personnel and contract personnel of the Authority.

3. PURPOSE

The adoption of this Policy expresses Cyta's zero tolerance for human rights violations.

To uphold and protect human rights within Cyta’s sphere of influence, this Policy ensures that Cyta operates in full compliance with international human rights standards, free from discrimination and rights violations.

Our main concern is to promote equality, respect for human dignity and the protection of customers' personal data, and to combat discrimination and abuse. This demonstrates our commitment to creating a healthy and safe working environment, while providing transparency in our cooperation with third parties, thereby promoting a fair, transparent and humane approach to Cyta's activities.

A further consequence of the Human Rights Policy is the strengthening of Cyta's social role with a focus on respect for human dignity.

4. SCOPE OF APPLICATION

This policy is binding on the Authority, its Personnel and Affiliated Entities.

We believe that everyone has a role to play in the protection and defence of Human Rights and Freedoms and we are committed to ensuring that these values are reflected in all aspects of our business activities.

Our commitment extends to all areas of employment in relation to Personnel and all areas of activity in relation to our partners, customers and any third party. We expect Personnel to support these values in their interactions with each other, with third parties and with the wider society.

5. OBLIGATIONS

5.1 In order to implement the principles of this Policy, the Board Members and the Personnel shall:

5.1.1 Apply and comply with the laws, regulations and obligations applicable to Cyta's activities.

5.1.2 Know, recognize and respect Human Rights and Freedoms.

5.1.3 Act with respect for human dignity and the privacy of others.

5.1.4 Take all necessary measures to avoid situations that may lead to a violation of rights.

5.1.5 Demonstrate zero tolerance for incidents and circumstances that violate and/or do not promote Human Rights and Freedoms.

5.1.6 Take appropriate measures to eliminate all discrimination and to provide equal opportunities.

5.1.7 Respect the confidentiality of personal data.

5.1.8 Treat all people with dignity and respect.

5.1.9 Act in accordance with high ethical and professional standards and codes of conduct, with a commitment to duty and moral integrity.

5.1.10 Always perform their duties selflessly, impartially and objectively.

5.1.11 Conduct day-to-day activities in accordance with this Policy.

5.1.12 If they become aware that a violation of the Policy has occurred, they should report or denounce the incident.

5.1.13 Read and accept this Policy.

5.1.14 Be informed of and accept the provisions of subsequent versions of this Policy.

5.2 Specific requirements for the Board:

In particular, the Chairperson, Vice-Chairperson and Members of the Board are required to comply with the provisions of the Policy and the applicable legal framework.

5.3 Specific requirements for the Superiors:

5.3.1 To ensure that their teams are aware of and apply the contents of this Policy.

5.3.2 If they become aware of allegations of a breach of this Policy, they should act responsibly and professionally.

5.4 Commitments of the Authority:

5.4.1 To demonstrate zero tolerance for circumstances, acts, actions and omissions that may lead to rights violations.

5.4.2 It will not tolerate offensive or inappropriate behaviour, unfair treatment or retaliation of any kind.

5.4.3 It prohibits discrimination and harassment.

5.4.4 It recognizes its influence in its field of activity and is committed to working with social partner groups.

5.4.5 It is committed to communicating and consulting with local communities before and during its activities in order to prevent, mitigate and eliminate potential negative impacts of its operations by taking appropriate measures.

5.4.6 It is committed to monitoring and protecting the health, safety and privacy of its Personnel and customers arising from the use or disposal of its products/services.

5.4.7 Enhancing the awareness of the Personnel through information

and training, while conducting the company's activities with respect to Human Rights and Freedoms.

5.4.8 It is committed to promoting respect for and protection of Human Rights and Freedoms.

5.4.9 It cooperates with institutions that adopt and apply the same level of respect for Human Rights and Freedoms.

6. SPECIFIC AREAS OF APPLICATION

Indicative commitments relating to specific areas of implementation hereof are as follows:

6.1 Workplace and working conditions

6.1.1 We provide a safe and healthy workplace in compliance with applicable laws, regulations and internal health and safety rules. We focus on maintaining a productive workplace, that minimizes the risk of accidents, injuries and exposure to health hazards. We are committed to engaging Personnel in the continuous improvement of workplace health and safety, ensuring that hazards are identified and health and safety issues are observed.

6.1.2 We faithfully apply legislation such as the Recruitment of Persons with Disabilities in the Wider Public Sector (Special Provisions) Law [Law 146(I)/2009] regarding the employment of Personnel and good employment practices with a view to the welfare, development, safeguarding and protection of all Personnel and in particular vulnerable groups.

6.1.3 We are committed to maintaining a workplace free from discrimination, violence, harassment, intimidation and other unsafe or disturbing conditions caused by internal or external threats.

6.1.4 We provide safety guarantees for the Personnel, as deemed necessary, respecting the privacy and dignity of the Personnel.

6.1.5 We apply lawful disciplinary practices in accordance with general principles of law.

6.1.6 We recognize, value and respect the exercise of trade union freedom and the right to collective bargaining, within the framework of relevant regulations and existing agreements, and are committed to open and constructive dialogue and a relationship of mutual trust.

6.1.7 We are committed to the prohibition of all forms of forced labour, human trafficking and modern slavery.

6.1.8 We respect the minimum age for employment in accordance with applicable laws.

6.1.9 We are committed to treating all Personnel with respect and protecting them from any form of corporal punishment, psychological or physical coercion, abuse or harassment, or any threat of such conduct.

6.2 Diversity and respect for equality

We value people's diversity and adopt and implement policies to protect and safeguard it. We have a long-standing commitment to providing equal opportunities and do not tolerate discrimination and harassment. We ensure that individuals in our field of activity are treated without discrimination on the basis of race, gender, colour, national or social origin, religion, age, disability, sexual orientation, political opinion or any other status protected by applicable law. Regardless of personal characteristics and social status, Cyta does not tolerate offensive or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and, in any Cyta-related circumstance, outside the workplace. These principles apply not only to the Personnel, but also to customers, suppliers, partners and all other Affiliated Entities.

6.3 Personal data and privacy

We recognize that the protection of personal data and respect for privacy are fundamental rights. We faithfully apply the legislation concerning the protection of personal data and privacy in all areas of our operations, adopting policies and practices to ensure that related matters are addressed lawfully and effectively.

6.4 Environment

As part of Cyta's operations, we are committed to protecting the environment and promoting the positive impact of sustainable development on business.

7. LEGAL FRAMEWORK

Cyta applies everything contained in the sources of law and binding on the Republic of Cyprus in the matter of the protection of Human Rights and Freedoms. The following are indicative examples:

- Constitution of the Republic of Cyprus: Fundamental Human Rights and Freedoms are guaranteed in Part II of the Constitution, which is modelled on the European Convention on Human Rights (ECHR)
- International Bill of Human Rights
- European Convention on Human Rights and Fundamental Freedoms (ECHR)
- Charter of Fundamental Rights of the European Union
- European Charter for Regional or Minority Languages (1992)
- Council of Europe Framework Convention for the Protection of National Minorities (1995)
- The UN Conventions:
  - International Covenant on Civil and Political Rights (1966)
  - International Covenant on Economic, Social and Cultural Rights (1966)
  - International Convention on the Elimination of All Forms of Racial Discrimination (1965)
  - Convention on the Elimination of All Forms of Discrimination against Women (1979)

  - Convention on the Rights of the Child (1989)
  - Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1984)

- Persons with Disabilities Law of 2000
- Combating of Racial and Certain Other Discrimination (Commissioner) Law of 2004
- Equal Treatment (Irrespective of Racial or Ethnic Origin) Law of 2004
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Optional Protocol) (Enacting Law) Law of 2009
- Equal Treatment of Men and Women (Access to and Provision of Goods and Services) Law of 2008
- Convention on the Rights of Persons with Disabilities and Related Matters (Enacting Law) Law of 2011
- Equal Treatment in Employment and Labour Law of 2004
- Equal Treatment of Men and Women in Employment and Vocational Training Law of 2002
- Equal Pay for Equal Work or Work of Equal Value between Men and Women Law of 2002
- Commissioner for Administration Laws of 1991 to 2014 and Commissioner for Administration (Amendment) Law of 2022

8. LINKS WITH OTHER POLICIES/DECISIONS/OBLIGATIONS

The Board and the Personnel must implement all policies and decisions of the Authority. By way of illustration, a number of interrelated policies are listed below:

- Code of Ethics and Conduct
- Whistleblowing Policy

- Diversity, Equality and Inclusion Policy
- Policy on Preventing and Combating Harassment and Sexual Harassment
- Personnel Safety and Health Policy
- Privacy Policy

9. REPORTS OF BREACHES OF THE POLICY

Where circumstances may constitute a breach of this Policy, its principles, or related instructions, decisions, circulars or policies, or a violation of Human Rights and Freedoms, Personnel and Board Members must report the matter through the appropriate channels, in accordance with the relevant procedures, regulations, the Whistleblowing Policy and/or other applicable policies.

10. INFORMATION, AWARENESS-RAISING AND TRAINING ON THE POLICY

10.1 The Board Members and the Personnel are expected to know and apply the provisions of this Policy. To this end:

10.1.1 It shall be ensured, through the Human Resources Management Directorate, that all Personnel and, through the Secretary, Board Members, are regularly updated on the Policy to ensure the widest possible knowledge and effective implementation hereof. Information about the Policy and a copy of the Policy, as amended from time to time, shall be prominently displayed on the Authority's intranet and on the Authority's public website.

10.1.2 Training shall be provided to the respective Personnel and Board Members to enhance their knowledge and awareness of the Policy. Personnel training (face-to-face or online) shall be conducted on a regular basis, using various tools to monitor the level of knowledge within the Authority to ensure that adequate training is provided to Personnel.

10.2 Information and awareness-raising activities shall be disseminated both internally and to external partners, as well as to the general public, in

order to consolidate support for the principles of the Policy within and outside the Authority.

11. CONTINUOUS IMPROVEMENT AND REVIEW OF POLICY

The Policy shall be reviewed in accordance with the approved Policy Review Framework and shall be periodically updated, depending on organisational and/or operational needs.