

Joint Commitment by Hrvatski Telekom d.d., A1 Hrvatska d.o.o.,  
and Telemach Hrvatska d.o.o. to Uphold and Advance Children's  
Rights in the Digital Environment

**CODE OF CONDUCT  
ON CHILDREN'S RIGHTS  
IN THE DIGITAL ENVIRONMENT**



**telemach**

---

## Foreword

In today's digital age, children are increasingly active online - learning, communicating, playing, and expressing themselves through technology. Given their vulnerability and developmental needs, children require special protection and support in the digital environment.

We, Hrvatski Telekom d.d., A1 Hrvatska d.o.o., and Telemach Hrvatska d.o.o., as leading telecommunications providers in the Republic of Croatia, recognize our responsibility in shaping a safe, inclusive, and fair digital space for children. Guided by UNICEF's tools and frameworks such as the MO-CRIA (Child Rights Impact Self-Assessment Tool for Mobile Operators) and the Children's Rights and Business Principles, we have developed this Code of Conduct on Children's Rights in the Digital Environment.

This Code represents our joint and public commitment to:

- respect and support children's rights across all aspects of our operations,
- continuously assess and improve our practices in line with international best practice standards,
- collaborate with institutions, civil society, and parents to ensure that digital technologies serve as tools for development, not sources of harm.

As leading telecom providers in Croatia, **Hrvatski Telekom d.d., A1 Hrvatska d.o.o.,** and **Telemach Hrvatska d.o.o.,** we jointly commit to the principles outlined in the **Code of Conduct on Children's Rights in the Digital Environment.**

Together, we pledge to:

### Ensure Online Safety & Protection

- Provide **robust parental controls** to protect children from harmful digital content.
- Ensure the implementation of clearly defined and accessible **reporting mechanisms** - such as national hotlines and specialized channels for reporting child sexual abuse material (CSAM) and other harmful content - to facilitate timely and effective protection of children in digital environments.
- Collaborate with **educational institutions, NGOs, and public bodies** to raise awareness of online risks and promote safe behavior.
- Actively support initiatives such as **Safer Internet Day** and distribute **educational resources** to schools and families.

### Protect Children's Data Privacy & Security

- Uphold **transparent and child-sensitive data policies**, ensuring that children's personal data is collected and processed responsibly.
- Avoid unnecessary data collection and implement **privacy-by-design** in all services accessed by children.
- Provide **clear, accessible privacy settings** and obtain **informed consent** in age-appropriate ways.

---

## Promote Equitable Digital Inclusion

- Work to ensure **universal access** to safe and age-appropriate digital services, especially for children in **rural and underserved areas**.
- Support **digital literacy and inclusion programs** for children, parents, and educators.
- Develop and promote **accessible technologies** for children with disabilities.

## Practice Responsible Marketing

- Prevent **children's exposure to manipulative or exploitative advertising**.
- Ensure all marketing content is **clearly labeled** and **age appropriate**.
- Monitor third-party advertising partners to ensure compliance with company policies.

## Monitor, Assess, and Report Transparently

- Conduct **child rights impact assessments**, leveraging using the **MO-CRIA self-assessment tool and D-CRIA tool**.
- Identify and address risks and opportunities related to children's rights across our operations and services.
- Publicly report on our **progress, challenges, and actions** to ensure transparency and accountability.

## Collaborate and Advocate for Systemic Change

- Partner with **UNICEF, Hrvatska regulatorna agencija za mrežne djelatnosti (HAKOM), the Ombudsperson for Children**, and other stakeholders to align with **national and international child rights standards**.
- Contribute to the achievement of the **UN Sustainable Development Goals**, particularly those related to education, equality, and child protection.
- Actively participate in joint initiatives such as the **Charter on the Safety of Children on the Internet** to foster a safer digital environment for all children in Croatia.

This document reflects our shared responsibility to respect, support, and champion the rights of every child in the digital age. Through collaboration, innovation, and accountability, we aim to make the digital world a safer, more inclusive space for children across Croatia.

---

**For Hrvatski Telekom d.d.**

\_\_\_\_\_ Date: \_\_\_\_\_

Name: Nataša Rapać

Title: Chief Executive Officer and President of the Management Board

**For A1 Hrvatska d.o.o.**

\_\_\_\_\_ Date: \_\_\_\_\_

Name: Dejan Turk

Title: Chief Executive Officer

**For Telemach Hrvatska d.o.o.**

\_\_\_\_\_ Date: \_\_\_\_\_

Name: Adrian Ježina

Title: Chief Executive Officer