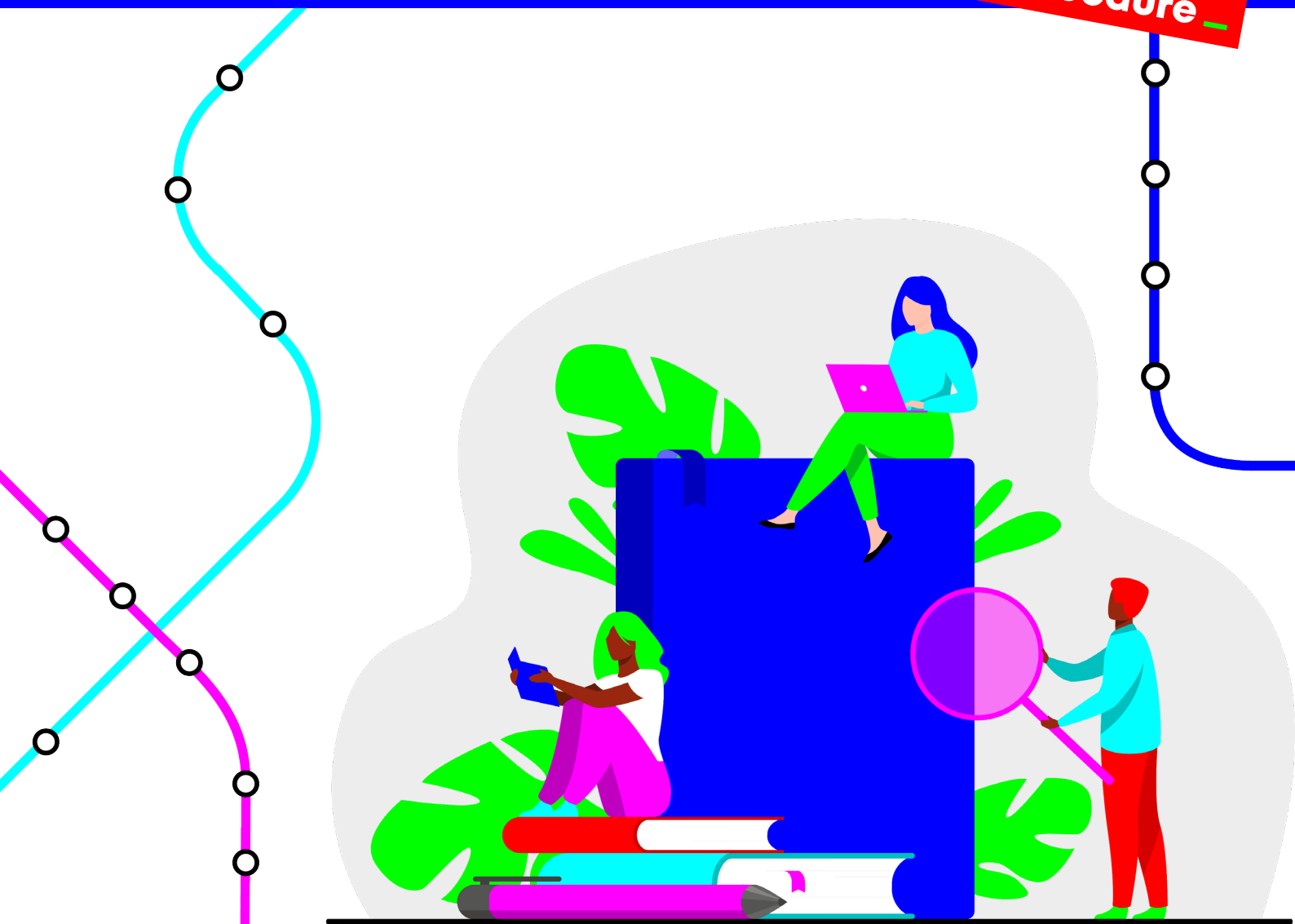


Compliance reporting procedure

rules of procedure_



Compliance reporting procedure

Rules of procedure

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Preamble

Axel Springer¹ is committed to responsible corporate governance. Alongside entrepreneurship and creativity, integrity is a fundamental value of the company and the foundation of our corporate culture. Responsible business conduct, respect for human rights and the careful use of natural resources guide our entrepreneurial activities in our own business areas as well as in our supply chains.

Our compliance reporting procedure is an important component of the Axel Springer Compliance Management System. There are several points of contact to which our employees², business partners and customers can turn if they wish to report possible compliance violations.

Violations of the law or disregard for the [Code of Conduct](#), the [Supplier Code of Conduct](#) and other internal regulations are not tolerated at Axel Springer. To recognize any misconduct at an early stage and to be able to take countermeasures, we rely on indications of misconduct always being addressed openly. We encourage employees and external persons to report potential violations. Whistleblowers who make a report in good faith and to the best of their knowledge and belief will not be disadvantaged in any way.

This Compliance Reporting Procedure covers the following:

- available points of contact,
- appropriate reporting topics,
- information required when submitting a notification, and
- procedures following an initial report.

¹ In this document, *Axel Springer* always refers to Axel Springer SE and all controlled companies of the Axel Springer Group.

² For reasons of linguistic simplification alone, only the masculine form is used to refer to persons. In terms of content, persons of all gender identities are always meant.

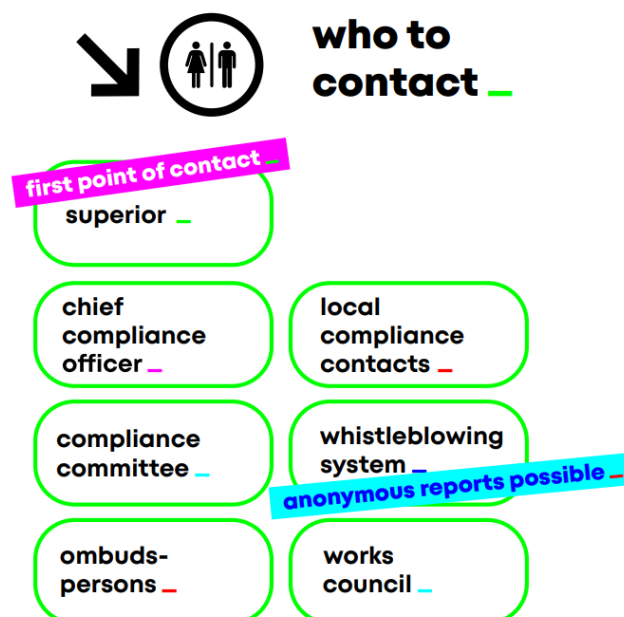
Why should I submit a report?

Compliance, i.e. adherence to legal provisions, voluntary commitments, and internal company policies, is an essential element of integrity - a fundamental value of Axel Springer.

Various points of contact are available to employees and external persons to report possible compliance violations. Information on actual or suspected violations of the law and other irregularities can be submitted confidentially via these channels. Indications of damaging behavior or risks that endanger our company help us to uncover potential financial and reputational damage at an early stage. Whistleblowers may also submit a report to regarding potential violations of human rights or damage to the environment at one of our businesses or within the supply chain.

Which reporting channels are available?

Axel Springer has set up various central and decentralized contact points for its employees, business partners and customers through which possible compliance violations can be reported.



The first point of contact for questions and doubts that employees or managers have about compliance issues is their direct line manager.

Furthermore

- the Chief Compliance Officer,
- the local compliance teams,
- the members of the Compliance Committee,
- the ombudspersons, and
- the works council

are trustworthy contacts if there is a suspicion that relevant rules of conduct or legal provisions are not being observed.

It is also possible to submit a report - also anonymously - via the [electronic whistleblower system](#). The central whistleblower system for the Axel Springer Group is available to employees as well as customers, suppliers, and business partners.

In addition, various companies in the Group have set up their own decentralized reporting offices.

Axel Springer has also set up additional, low-threshold internal contact points in numerous Group companies for those affected by and witnessing sexual harassment and discrimination in the workplace: These persons of trust are colleagues from many different company divisions and hierarchical levels and support employees with questions and assessments of cross-border situations - of course in strict confidence. Furthermore, affected employees can always contact their HR department and the PME Family Service for psychological support or a lawyer of trust for legal questions.

According to the Whistleblower Protection Act in Germany, it is also possible to contact external reporting channels. However, reports can be dealt more quickly and directly if they are reported internally. Contact persons in the Compliance department are available to provide further information on reporting channels. More information on the options for external reporting is available at the [German Federal Office of Justice](#).

Which reports can I submit?

Whistleblowers can report possible legal violations or disregard of the [Code of Conduct](#), the [Supplier Code of Conduct](#) and other internal regulations committed by Axel Springer employees in connection with their employment. Information can also be provided that indicates possible damage to Axel Springer by third parties.

The points of contact must not be misused to deliberately provide false or defamatory information. Any such reports may result not only in civil but also in criminal prosecution.

Reports pertaining to suspected violations within the following main topics may be submitted:

- Corruption / Bribery
- Data protection and IT security law
- Theft / fraud / embezzlement
- Antitrust and competition law
- Capital market law

- Violations of human rights / environmental protection regulations (at Axel Springer and suppliers)
- Gross violations of the Code of Conduct / Principles of Social Responsibility ([Code of Conduct](#))
- Sexual harassment in the workplace
- I am looking for advice

Explanations and examples of the main topics of a notification are listed in the [appendix](#).

How do I submit a report?

To enable a report to be processed, whistleblowers should describe the facts of the case as specifically and in as much detail as possible.

It is helpful if whistleblowers are guided by the following points, which are also queried in the electronic whistleblower system:

- Detailed description of the incident, i.e. chronological sequence of events, place, and time of the possible misconduct, in which company/division/ department
- As detailed information as possible regarding the people involved, i.e. those affected, witnesses, perpetrators and their relationship to the company, involvement of managers, knowledge by managers
- Possible or expected damage (financial, reputation)
- Information on the identity of the whistleblower or selection of the option to submit the report anonymously.

An additional file of up to 10 MB can be sent in the electronic whistleblower system. In addition, a separate mailbox can be set up. This enables protected communication between the whistleblower and employees from Axel Springer's Group Compliance team as well as the transmission of additional files. By setting up a mailbox, the whistleblower can actively participate in the investigation and be informed about the progress of the investigation. No data may be entered that would allow conclusions to be drawn about the whistleblower if he or she wishes to remain anonymous.

All incoming reports are documented. The receipt of a report will be confirmed to the whistleblower within a maximum of seven days after submission of the report. The whistleblower can only be notified if a mailbox has previously been set up in the report or another contact option has been communicated or - in the case of an anonymous report - a mailbox has been set up in the electronic whistleblowing system. Only selected employees of the responsible Compliance department have access to the reports and mailboxes in the electronic whistleblower system.

Feedback is provided to the whistleblower no later than three months after the report is submitted. The feedback includes information on planned measures and measures already taken. If an investigation has been carried out, the whistleblower will receive feedback on the outcome at the end of the investigation. Feedback can only be sent to the whistleblower if a mailbox has been set up beforehand or another contact option has been communicated or - in the case of an anonymous report - a mailbox has been set up in the electronic whistleblowing system.

Feedback will only be provided to the whistleblower insofar as this does not affect internal inquiries or investigations and the rights of the persons who are the subject of a report or who are named in the report are not impaired.

What is the process of an investigation?

All incoming reports of violations will be investigated. Minor incidents may be referred to other departments (e.g. line managers, responsible HR department). In general, investigations are led by the Chief Compliance Officer.

Each report is first evaluated for credibility (especially in the case of anonymous reports), materiality and the comprehensibility of the information received. A plausibility check is then carried out to determine whether there may be a violation of laws or internal regulations. If there are sufficiently concrete indications that a reported grievance or a reported undesirable development is conceivable, the Chief Compliance Officer initiates all further steps to clarify the matter.

The Chief Compliance Officer may involve other internal and/or external bodies, such as Internal Audit, if they are required to process a report (e.g. special expertise). Every person who receives access to data is obliged to treat this data confidentially to maintain the greatest possible discretion. To protect the employees concerned, the circle of bodies and persons to be involved in the clarification of the facts is kept as narrow as possible. The principle of the greatest possible confidentiality applies.

If a report implicates individual employees, exonerating circumstances are included in the investigation to the same extent as any incriminating circumstances. The responsible bodies are guided in their investigations by the principle of the presumption of innocence.

Retaliation against whistleblowers is prohibited: Whistleblowers who submit a report in good faith will not be discriminated against. Discrimination against whistleblowers in response to such a report will be prosecuted as a separate violation.

Contact

Centrally responsible for the compliance reporting procedure in the Axel Springer Group and primary contact person for questions or comments:

Chief Compliance Officer

Florian von Götz

compliance@axelspringer.de

Appendix 1: Explanation of the main topics

Corruption / Bribery

Taking advantage of a position of power to obtain a personal financial or material advantage to which there is no legal entitlement. This concerns bribery and corruption in business dealings (in active and passive form) as well as the granting of advantages and bribery of members of parliament.

Examples:

- Granting of benefits with the specific intention of positively influencing a business decision or the performance of duties/office.
- Unfair influence in business decisions through the personal acceptance of a (monetary) advantage (e.g. in the form of a reimbursement); Example situation: When deciding on the award of a contract, an employee chooses a supplier who has submitted an unreasonably expensive offer compared to the competition because he receives a personal advantage (e.g. a payment) from the supplier.

Data protection and IT security law

Breaches of data protection laws, violations of IT security guidelines and reporting of IT security incidents. This includes cases involving a large number of people (e.g. users, customers or employees) or particularly sensitive data (e.g. credit card, salary and financial data or health information).

Examples:

- Misuse of data
- Unauthorized disclosure of end customer data to third parties (e.g. data of subscribers or users)
- Hacker attacks; "theft" or unlawful sale of data and/or company information
- Impairment of the security and confidentiality of data traffic (e.g. tapping telephones, reading emails)
- Passing on user accounts and passwords to unauthorized persons
- Insufficient access protection for sensitive data

Theft / fraud / embezzlement

All acts carried out intentionally to the detriment of the company.

Examples:

- Theft of Axel Springer property or stealing from colleagues
- Theft of company information
- Fraudulent manipulation of accounts and balance sheets
- Fraud in tenders
- Misappropriation of company funds
- Embezzlement and forgery of documents

Antitrust and competition law

An infringement is deemed to have occurred in the event of restrictions on competition, abuse of market power, failure to carry out the necessary merger control or unfair business practices.

Examples:

- Price fixing, customer and territorial agreements, in particular with competitors, which have as their object or effect the restriction or distortion of competition
- Exchange of competitively sensitive information between competitors (also "over bands")
- Abusive pricing or other conditions as well as objectively unjustified unequal treatment (discrimination)
- Acquisition of assets that could be associated with a market position without antitrust clearance (e.g. subscription card index)
- Intentionally misleading or untrue statements about products and services and betrayal of business or trade secrets
- No transparent separation between paid advertising space and editorial contributions

Capital market law

Violation of the ban on insider trading and ban on market manipulation.

Examples:

- Purchase or sale of shares using insider information (i.e. information that would have a significant impact on the share price if it were made public)
- Unauthorized disclosure or disclosure of inside information

- Issuing buy or sell recommendations on the basis of insider information
- Incorrect or misleading information or other acts of deception regarding circumstances relevant to the valuation of shares

Violations of human rights / environmental protection regulations (at Axel Springer and suppliers)

Violations of due diligence obligations or violations of the rights and freedoms proclaimed in the United Nations Universal Declaration of Human Rights and environmental protection regulations, in particular, the legal interests laid down in the Supply Chain Due Diligence Act (LkSG), at Axel Springer and its direct or indirect suppliers.

Examples:

- Prohibited child labor
- Employment of persons in forced labor and modern slavery
- Disregard of local health and safety regulations
- Disregard for freedom of association
- Discrimination and unequal treatment based on national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief
- Withholding an appropriate wage
- Pollution of soil, water and air as well as harmful noise emissions or excessive water consumption that may contribute to a violation of human rights
- Unlawful evictions or the unlawful seizure of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person
- Hiring or using private or public security forces to protect a company project if, due to a lack of instruction or control on the part of the company when deploying the security forces
 - the prohibition of torture and cruel, inhumane, or degrading treatment is disregarded,
 - life or limb are injured or
 - the freedom of association and unionization are impaired.

Violations of environmental protection regulations include the use of mercury (in accordance with the Minamata Convention), the use of persistent organic pollutants (in accordance with the Stockholm Convention) and the

environmentally unsound storage, handling, import and export of hazardous waste (in accordance with the Basel Convention).

Gross violations of the Code of Conduct / principles of social responsibility

Behavior that grossly violates the internal rules of the Code of Conduct applicable at Axel Springer or at the respective Group company and that is not listed separately in the other key topics. A gross violation is deemed to have occurred in the event of persistent disregard of required behavior. In any case, the following **examples** constitute gross violations:

- Non-compliance with the guidelines for safeguarding journalistic independence at Axel Springer
- Personal conflict situations (e.g. bullying, stalking, abuse of power, i.e. taking advantage of a position vis-à-vis employees in an unlawful, unethical manner, e.g. for (sexual) favors)
- Discrimination, xenophobia, racism, anti-Semitism, extremism
- Conflicts of interest due to the pursuit of private interests, e.g., through secondary employment
- Violations of laws and regulations (employee protection rights)

Sexual harassment in the workplace

Sexual harassment in the workplace is a gross violation of the Code of Conduct and legal regulations and of the understanding of a respectful corporate culture that prevails at Axel Springer.

Sexual harassment refers to sexually derogatory behavior and unwanted sexual acts that violate the dignity of the person concerned.

Examples:

- Unwanted showing, posting or sending, by whatever means, sexually explicit or pornographic images and texts
- Unwanted sexual touching
- Unwanted solicitation for intimate or sexual acts
- Unwanted repeated physical approach
- Physical violence

I am looking for advice

If someone is looking for advice on compliance-relevant issues within the company, they can submit their request to Axel Springer - anonymously if they wish via the electronic whistleblower system. The request will be forwarded directly to the Group Compliance Team, which will process the request.