

Supplier Code of Conduct (SCoC)

The Hubert Burda Media Corporate Group (hereinafter: Hubert Burda Media) stands for entrepreneurship, diversity and responsibility. According to our commitment to our values as a media and technology company, we acknowledge our corporate responsibility to respect human rights and the related environmental aspects in our own business activities as well as the value chain of all our products and services.

Hubert Burda Media is committed to environmentally and socially responsible corporate management. We adhere to the principles of ecological, social and ethical behaviour and integrate them into our corporate culture. In addition, we endeavour to continuously optimise our business practices and our products and services in terms of sustainability and keep our environmental impact as low as possible. In order to implement and ensure due diligence in the supply and value chain – in particular also on account of the German Act on Corporate Due Diligence in Supply Chains (Lieferkettensorgfaltspflichtengesetz; hereinafter: LkSG or Act on Corporate Due Diligence in Supply Chains) – we have formulated our expectations for our suppliers in this Supplier Code of Conduct (hereinafter: SCoC).

I. Our Standards

At Hubert Burda Media, we implement the requirements for corporate due diligence in our own business area and in the supply and value chain, and we are particularly guided by the following international reference instruments:

- United Nations' Guiding Principles on Business and Human Rights,
- United Nations' Universal Declaration of Human Rights,
- Core labour standards of the International Labour Organisation (ILO) with four fundamental principles: freedom of association and the right to collective bargaining, elimination of forced labour, abolition of child labour, and prohibition of discrimination in employment and occupation
- European Convention on the Protection of Human Rights and Fundamental Freedoms

II. Obligation

By acknowledging this SCoC, our suppliers commit to implementing due diligence obligations for the value chain as we commit to our due diligence in our own business area. Our requirements for our suppliers are:

- commitment to respect for human rights and a holistic, sustainable approach to business activities,
- ensuring the implementation of due diligence obligations for the supply chain and value chain,
- pursuing the commitment of subcontractors to comply with the standards and regulations in this SCoC.

III. Requirements

The obligation in accordance with Section II includes in particular the following human rights and environmental standards in our own business area and in the supply chain of our suppliers.

a. Social responsibility

- Prohibition of child labour (§ 2 para. 2 nos. 1 and 2 LkSG)
Child labour may not be used at any stage of production. ILO Conventions 138 and 182 must be observed. The minimum age for the employment of children must be observed. Accordingly, the age should not be lower than the age at which general compulsory schooling ends according to law in the place of employment and in any case not under 15. If children are found to be working in violation of these provisions, measures must be taken and documented to remedy the situation and allow the children to attend school. The rights of young workers must be protected. Young workers under the age of 18 may not be used for work that is harmful to the health, safety or morals of children. Special protective regulations must be observed.
- Exclusion of forced labour (§ 2 para. 2 nos. 3, 4 and 11 LkSG)
No forced labour, slave labour or work of a comparable nature may be used. ILO Conventions 29 and 105 must be observed. Any work must be voluntary and without the threat of punishment. Workers must be able to terminate work or employment at any time. In addition, unacceptable treatment of workers, such as mental hardship, sexual and personal harassment and degradation, must not take place. The engagement or use of security forces should be avoided if they treat persons inhumanly or degradingly or interfere with freedom of association during their deployment.
- Protection of health and safety at work (§ 2 para. 2 no. 5 LkSG)
A safe and healthy work environment must be ensured. Appropriate occupational safety systems have to be established and applied to take necessary precautions against accidents and health damage that may arise in connection with the work. Excessive physical or mental fatigue is to be prevented by appropriate measures. In addition, employees must be regularly informed about and trained in applicable health and safety standards and measures. Access to drinking water in sufficient quantities and access to clean sanitary facilities must be made available to employees.
- Freedom of association (§ 2 para. 2 no. 6 LkSG)
The right of workers to found, join and participate in organisations of their own choosing and to negotiate and strike collectively is to be respected. ILO Conventions 87 and 89 must be observed. In cases where the freedom of association and the right to collective bargaining are legally restricted, alternative means of independent and free association of workers for the purposes of collective bargaining are to be provided. Worker representatives are to be protected against discrimination. Workers may not be discriminated against on the grounds of founding, joining or being a member of such an organisation. Worker representatives are to be granted free access to the workplaces of their colleagues in order to ensure that they can exercise their rights in a lawful and peaceful manner.

- Prohibition of discrimination (§ 2 para. 2 no. 7 LkSG)

The discrimination of employees in any form is not allowed. This includes, for example, discrimination on the basis of gender, race, caste, national, ethnic or social origin, skin colour, disability, health status, political conviction, origin, worldview, religion, age, pregnancy or sexual orientation. ILO Convention 111 must be observed. The personal dignity, privacy and personality rights of each individual are respected.
- Fair remuneration (§ 2 para. 2 no. 8 LkSG)

The remuneration for regular working hours and overtime must correspond to the national legal minimum wage or the industry-specific minimum standards, whichever is higher. ILO Convention 100 must be observed. If the remuneration is not sufficient to cover the cost of ordinary living expenses and to set aside a minimum reserve, the remuneration must be increased accordingly. All legally required benefits must be granted to employees. Deducting wages as a punishment is not allowed. It must be ensured that employees receive clear, detailed and regular written information about the composition of their remuneration. Subcontractors are also to be committed to the same extent.
- Fair working conditions

Working times must comply with applicable laws or industry standards. Sufficient break times must be ensured. Overtime is only allowed within the limits of the legal requirements. Physical punishment, the threat of physical violence, sexual or other forms of harassment and intimidation are prohibited.
- Preservation of natural livelihoods (§ 2 para. 2 nos. 9 and 10 LkSG)

The deprivation of land, forests or water bodies, whose use secures the livelihood of people, without legitimate rights is prohibited. It is necessary to avoid harmful soil changes, water and air pollution, noise emissions and excessive water consumption that damage the health of people, significantly impair the natural basis for food production or prevent people's access to clean drinking water or sanitary facilities.
- Handling of conflict minerals

Processes in accordance with the guidelines of the Organisation for Economic Cooperation and Development (OECD) for the fulfilment of the due diligence obligation to promote responsible supply chains for minerals from conflict and high-risk areas are to be established for the conflict minerals tin, tungsten, tantalum and gold as well as for other raw materials such as cobalt. Smelting and refining without adequate, audited due diligence processes should be avoided.

b. Ecological responsibility

Handling waste and hazardous substances (§ 2 para. 3 nos. 1-8 LkSG)

A systematic approach must be developed to identify, handle, reduce and responsibly dispose of or recycle waste. The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989, as amended, must be observed. Chemicals or other materials that pose a risk to the environment when released are to be identified and handled in such a way that safety is ensured in their handling, transportation, storage, use, recycling or reuse and disposal. Mercury is to be used in accordance with the prohibitions of the Minamata Convention of 10 October 2013, and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001, as amended.

c. Ethical business conduct

- Fair competition

The standards of fair business practices, fair advertising and fair competition must be observed. Furthermore, applicable antitrust laws must be applied, which, in dealing with competitors, in particular, prohibit agreements and other activities that influence prices or conditions. Accordingly, no agreements or coordinated behaviour with other companies are to be made within business relationships that aim or achieve the prevention, restriction or distortion of competition in accordance with the applicable antitrust provisions. These regulations also prohibit agreements between customers and suppliers that aim to restrict customers' freedom to autonomously determine their prices and other conditions upon resale.

- Confidentiality/Data protection

The appropriate expectations of clients, suppliers, customers, consumers and employees must be met in regards to the protection of private information. The laws on data protection and information security and the regulatory provisions must be observed in the collection, storage, processing, transmission and disclosure of personal information.

- Intellectual property

Rights to intellectual property are to be respected; use of technology and the transfer of know-how must be carried out in a way that protects intellectual property rights and customer information.

- Integrity/Bribery, taking advantage

The highest standards of integrity are to be applied in all business activities. A zero-tolerance policy is to be pursued in the prohibition of all forms of bribery, corruption, extortion and embezzlement. Within business relationships, no benefits may be offered or granted or demanded or accepted in business transactions or in dealing with public officials where such benefits violate applicable anti-corruption provisions. Procedures for monitoring and enforcing the standards are to be applied to ensure compliance with anti-corruption laws.

IV. Implementation of requirements

In order to comply with the regulations mentioned in section III, we expect our suppliers to identify such risks within their own business areas, address compliance with the duty of care in their supply chain and take appropriate measures. In the event of suspicion of a violation or to secure supply chains with elevated risks, we ask our suppliers to inform us promptly and, if necessary, regularly about identified violations and risks and the measures taken.

If a violation of the regulations of this SCoC is detected, we will inform our suppliers immediately in writing within one month and set them a reasonable deadline to bring their behaviour into line with the regulations of the SCoC. If a remedy is not possible within a foreseeable period, the suppliers are to notify us immediately and, together with us, create a concept with a schedule for the termination or minimisation of the violation. If such a violation was committed culpably, the deadline expires fruitlessly, or the implementation of the measures contained in the concept does not bring about a remedy after the expiration of the schedule, and if the continuation of the contract until the ordinary termination is not reasonable for us and no milder solution is available, we reserve the right to withdraw from the contracts or give notice of extraordinary termination for good cause immediately. The legal right to extraordinary termination remains unaffected.

V. Complaint mechanism

Our suppliers have properly disseminated to their own employees the information we provided on how to contact us, who is responsible, and how to file a complaint. The complaint process must be accessible to employees while maintaining the confidentiality of their identity and effective protection against discrimination.

Employees can file a complaint or report a violation by using the Hubert Burda Media digital whistleblowing system, which can be accessed via <https://whistleblowing-system.burda.com>. In addition, complaints and violations can be reported by post, in person or by e-mail to the Hubert Burda Media Compliance Department at: Hubert Burda Media Holding Kommanditgesellschaft, Corporate Compliance, Hauptstraße 130, 77652 Offenburg, Germany, e-mail: compliance@burda.com. Further information on the complaint mechanism is available in the Rules of Procedure under the German Supply Chain Due Diligence Act ("LkSG") at burda.com/en/compliance/.

VI. Consent and duration

By confirming this document, our suppliers commit to

- acting responsibly and adhering to the principles/requirements listed;
- communicating the content of this Code to employees, contractors and subcontractors in an understandable way; and
- taking all necessary measures to implement the requirements.

The contents of the SCoC will take effect upon confirmation and will serve as the basis for all future services until further notice.