



# **STRÖER**

**CODE OF CONDUCT**





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# Foreword

## DEAR COLLEAGUES,

our core values of innovation, quality, appreciation as well as growth and development form the basis of our daily actions.

Fairness, honesty, and commitment in dealing with each other and with our business partners are essential concerns for us at all times.

It is precisely these unshakeable basic values that help us to master the increasing challenges of the digitalization of the world of work and media, the high complexity of legal requirements and the economic and ecological circumstances.

But being successful in so many business areas also means giving everyone the opportunity for creativity, initiative and personal responsibility. Only in this way can we develop and grow every day. In doing so, we trust in the integrity and responsibility of each and every individual. This Code of Conduct and our clear rules and guidelines cannot replace this individual responsibility but should serve as a clear guiding principle and orientation for our daily actions.

For us as the Management Board, these values as well as corporate responsibility and integrity have a particularly high priority.

It is our conviction that we can only be successful as a company and remain successful in the long term if our business activities follow ethical principles of conduct. This includes in particular the adherence to all internal and external rules (compliance).

We therefore encourage you to familiarize yourself with the contents of this Code of Conduct and to apply it within the framework of your daily actions, in your dealings with each other as well as with customers and business partners. In case of doubt or ambiguity, please seek competent advice from your supervisor or the Compliance Organization.

Udo Müller | Christian  
Schmalzl | Henning Gieseke



# Core statements of the **STRÖER CODE OF CONDUCT**

## **1 RESPONSIBILITY**

We are aware of our social responsibility and act in accordance with the law throughout our daily activities.

## **2 FAIR TREATMENT**

We treat each other with respect and do not tolerate harassment or discrimination.

## **3 HEALTH AND SAFETY**

Health, safety and the well-being of our employees have high priority.

## **4 ANTI-CORRUPTION**

We don't bribe and we don't take bribes.

## **5 DATA PROTECTION**

We ensure data protection and the confidentiality of the information entrusted to us.

## **6 CONFLICT OF INTERESTS**

We always make decisions free of potential or actual conflicts of interest.

## **7 CONFIDENTIALITY**

We protect confidential information and the reputation of our company.

## **8 JOURNALISTIC ETHICS**

We respect the truth, the safeguarding of human dignity and the truthful communication of information to the public.

## **9 SUSTAINABILITY**

Protecting the environment and the climate is part of our group-wide sustainability strategy.

## **10 WHISTLEBLOWING**

We address concerns openly and without fear for negative consequences.



# Guide to the Decision making



With this guide, we would like to provide you with some questions to help you assess whether a decision is in line with the Stroer Code of Conduct:

- Can I reconcile my decision with my conscience?
- Am I making the decision in the interest of the company and not in my own interest?
- Can I assume that I have observed relevant legal regulations and internal guidelines?
- Have all decisive aspects been considered and weighed up appropriately?
- Would I tell others about the decision (e.g. colleagues, relatives or acquaintances)?



## YOU ANSWERED YES TO ALL OF THE QUESTIONS?

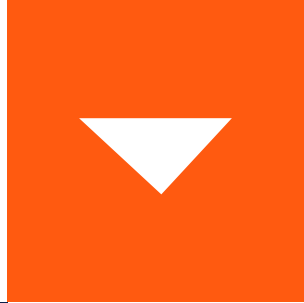
Your decision is probably in line with our Code of Conduct. If you are still unsure, please contact your supervisor or the Compliance Organization.



## YOU ANSWERED NO TO AT LEAST ONE QUESTION?

If you are unsure or need assistance in making your decision, please contact your supervisor or the Compliance Organization.

# 01



## GENERAL

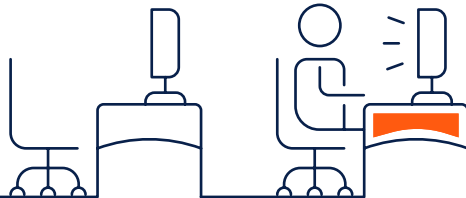
- 1.1 Scope
- 1.2 Legal compliance

## 1.1 Scope

This Code of Conduct applies to Stroer SE & Co. KGaA and its employees as well as all domestic and foreign companies of the Stroer Group and their employees.

Where reference is made to further, detailed regulations within Group guidelines, these are to be applied in accordance with their respective scope.

At the level of individual companies, this Code of Conduct can be expanded to include supplementary regulations.



## 1.2 Compliance with applicable laws



### IN BRIEF

We comply with applicable local, national, and international laws.

### BACKGROUND

Compliance with applicable laws and regulations is a given for us. This is the only way to ensure our business success. Any violation of applicable laws or regulations can have serious consequences for both the company and its employees.

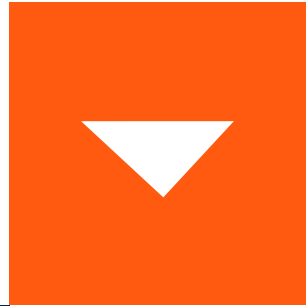
### WHAT WE DO FOR IT

- We know the applicable laws, regulations and internal rules for our area of responsibility.
- If individual countries or business areas have stricter regulations than those described in this Code of Conduct, we comply and adhere to these.
- We seek advice promptly if there is any doubt as to whether a decision is legally appropriate.





# 02



## LABOUR AND HUMAN RIGHTS

- 2.1 Respect for fundamental and human rights
- 2.2 Fair treatment, equality & inclusion
- 2.3 Fair working conditions
- 2.4 Freedom of association and assembly
- 2.5 Health and safety

## 2.1 Respect for fundamental and human rights

### IN BRIEF

We respect fundamental and human rights.

### BACKGROUND

We respect and recognize cultural, social, and political diversity. We are committed to respecting and promoting fundamental and human rights.



### WHAT WE DO FOR IT

- We explicitly commit to internationally recognized frameworks and the fundamental and human rights formulated therein, such as the UN Guiding Principles on Business and Human Rights or the core labor standards of the International Labor Organization (ILO).
- We actively fulfil our human rights due diligence obligations and seek dialogue with our suppliers, business partners and other stakeholders to this end.
- We prevent possible violations of fundamental and human rights within our organization and along our supply chain through adequate systems and measures.
- We have established fixed complaint and escalation mechanisms to report possible cases of violations of our internal rules and regulations. These are consistently followed up and countermeasures are implemented.
- Through our Code of Conduct for suppliers and business partners, we also extend our view beyond our company to ensure compliance with fundamental and human rights.
- Further guidance can be found in our „Declaration of principles on respect for human rights“, and the „Stroeer Social Charter“.

## 2.2 Fair treatment, equal opportunities and inclusion

### IN BRIEF

We do not tolerate discrimination, our goals are equal opportunities, diversity and inclusion.

### BACKGROUND

We are clearly committed to diversity, equal opportunities, and inclusion. Any form of discrimination based on ethnic or national affiliation, gender, religion, ideology, age, disability, sexual orientation, skin color, political views, social status, origin or other legally protected characteristics as well as harassment or bullying will not be tolerated by us.

### WHAT WE DO FOR IT

- We are a signatory to the Diversity Charter and are thus publicly committed to promoting diversity within and outside the company.
- We have set ourselves goals to promote women in management positions and actively advocate this issue in external networks.
- We value diversity, inclusion and fair treatment and condemn any discriminatory actions or threats of harm or violence.
- We take care to ensure that our employees are selected, hired and promoted on the basis of their qualifications and skills.
- We ensure the individual and non-discriminatory development and remuneration of our employees.
- We promote the compatibility of private and professional life through flexible working models and a modern work culture.
- We expressly encourage employees to actively report possible incidents of discrimination. Various complaint channels are available for this purpose within the Group (supervisors, HR department, works council, compliance hotline) and externally (Federal Anti-Discrimination Agency).



## 2.3 Fair working conditions



### IN BRIEF

We are committed to and ensure fair working conditions.

### BACKGROUND

Our wages and salaries, as well as social benefits granted, meet or exceed the respective national statutory minimum standards.

In accordance with ILO conventions, we do not condemn or participate in any form of forced or compulsory labour. In this context, we also condemn any form of child labour.

### WHAT WE DO FOR IT

- We condemn all forms of forced and compulsory labour.
- We regularly review our wage policy, also and in particular with regard to compliance with the statutory minimum wages, and thus ensure that our employees are remunerated in line with the market, their function and their performance.
- We disapprove of any form of child labour and do not employ children or young people in contravention of the law.
- We also pay attention to fair working conditions with our business partners and expect them to be law-abiding and to observe appropriate social and legal standards.
- We are committed to complying with national and local regulations on limits on working hours, overtime and paid leave in accordance with ILO conventions.



## 2.4 Unification and Freedom of assembly

### IN BRIEF

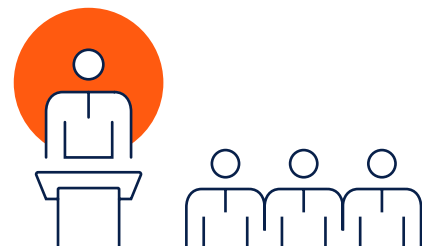
We recognize the fundamental right of all employees to freedom of association and collective bargaining.

### BACKGROUND

We respect the right of our employees to freedom of association and collective bargaining, as laid down in the ILO Convention. In doing so, we advocate an open and trusting cooperation on the basis of a constructive social dialogue with democratically legitimised employee representatives.

### WHAT WE DO FOR IT

- We act in accordance with applicable legal provisions of labour law.
- We enable our employees to organize themselves in trade unions and employee representatives.
- We promote trusting, fair and constructive cooperation with employee representatives.



## 2.5 Health and safety

### IN BRIEF

Health, safety and the well-being of our employees have high priority.



### BACKGROUND

A safe workplace and the prevention of accidents and injuries is a high priority for us.

We minimize health risks associated with our workplaces through targeted measures. We support our employees with health-related offers.

### WHAT WE DO FOR IT

- We create an attractive and safe working environment for our employees.
- We comply with all applicable health and safety laws, policies and procedures and actively seek to avoid any unsafe behaviour.
  - We record all accidents, near misses or observations of unsafe workplaces so that we can learn from them.
  - We participate in the implementation and refreshment of all relevant training measures.
  - We promote strict occupational health and safety conditions, e.g. with regard to working hours and conditions.



# 03



## GOVERNANCE

- 3.1** Business relationships
- 3.2** Fair competition and antitrust law
- 3.3** Anti-corruption – gifts and invitations
- 3.4** Dealing with authorities and public offices
- 3.5** Conflicts of interest
- 3.6** Data Protection
- 3.7** Information Security
- 3.8** Tangible and intellectual property
- 3.9** Money laundering, export controls and economic sanctions
- 3.10** Accounting and reporting
- 3.11** Insider Trading
- 3.12** Donations and sponsoring
- 3.13** Political engagement (lobbying)

## 3.1 Relations with Business partners



### IN BRIEF

We are reliable, act with integrity in our business relationships and expect that also from our business partners.

### BACKGROUND

Our business partners expect us to behave in a legally compliant and ethically correct manner. We expect the same from our partners. This is the basis of a trusting cooperation. We therefore expect our business partners to comply with our Supplier Code of Conduct. It reflects our own principles of conduct and is in particular intended to ensure the implementation of and compliance with human rights, labour and social standards as well as environmental protection among our business partners.

### WHAT WE DO FOR IT

- We carefully verify the identity and integrity of potential business partners in a risk-oriented manner.
- We take appropriate measures to ensure that transactions with third parties do not violate applicable embargoes, sanctions lists or anti-money laundering and anti-terrorist financing regulations.
- We ensure that our business partners follow the same high ethical standards as we do. To do this, we use a careful selection process and our Supplier Code.
  - We follow up on anomalies and warnings and report them to the compliance organization.





## 3.2 Fair competition and antitrust law



### IN BRIEF

We respect the principles of the free and fair market and the applicable antitrust and competition laws.

### BACKGROUND

In the markets in which we operate, we act in a way that is fair, honest, ethical and legal. We support functioning competition and comply with the applicable antitrust and competition laws. We do not enter into any customer, quantity, territory or price agreements with competitors, suppliers or other market participants that have an impact on the competitive situation.

### WHAT WE DO FOR IT

- We make independent decisions about prices, customers or whether to participate in a tender.
- In any contact with competitors, we take care to ensure that no information is received or given that could allow conclusions to be drawn about the current or future business conduct of the party providing the information.
- In discussions or other contacts (e.g. association meetings or trade fairs), we avoid topics that are of importance for competition among each other. These include, among other things, prices, pricing calculations, business planning, development statuses or delivery deadlines.
- We do not make unfair calls for boycotts and take care not to discriminate in an anti-competitive manner, e.g. by refusing to supply or by imposing unreasonable purchase or selling prices.
- We contact the Legal Department or the Compliance Organization if we have any uncertainties or questions.

## 3.3 Anti-corruption – gifts and invitations

### IN BRIEF

We don't bribe  
and we don't take  
bribes.

### BACKGROUND

Grants in the form of gifts, hospitality and invitations are widespread in business relationships. Provided that these benefits remain within reasonable limits and do not violate internal or legal regulations, they are not objectionable. If, however, such benefits exceed these limits and are used to influence third parties, this can have far-reaching consequences for the company and the individuals involved.



### WHAT WE DO FOR IT

- We always act independently and objectively in our business dealings to ensure that the reputation of our company is not compromised.
- We are particularly cautious when doing business in countries with a significant risk of corruption.
- We inform the Compliance Organization immediately if we are offered disproportionate benefits and advantages that do not comply with legal regulations or internal requirements.
- We are particularly careful when using intermediaries.
- We conduct travel exclusively in accordance with the applicable travel expense policy. We do not accept cost transfers and invitations from business partners.
- We do not include spouses, partners or children when we extend or accept invitations.
- Detailed regulations on invitations and gifts are contained in the "Anti-Corruption" policy.



## 3.4 Dealing with authorities and public offices

### IN BRIEF

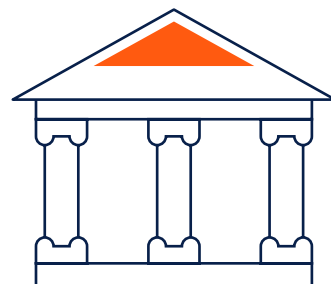
We maintain an impeccable relationship with government and regulatory agencies.

### BACKGROUND

Special legal conditions often apply when dealing with public officials or elected representatives as well as governments, authorities and other public institutions. This applies in particular to invitations and gifts. It is therefore important to exercise great care and the highest degree of integrity when dealing with public officials.

### WHAT WE DO FOR IT

- We pay attention to interact with authorities, officials or other services in a transparent and proper way.
- We always take care to refrain from offering benefits of any kind (including gifts and invitations of little value) to employees of public authorities/officials.
  - We always involve the relevant supervisor(s) or the Compliance Organization when we receive requests or invitations from or to authorities.



3.5

# Conflicts of interest

## IN BRIEF

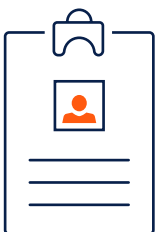
We always make decisions free from possible or actual Conflicts of Interest

## BACKGROUND

A potential conflict of interest exists when the private interests of employees collide or conflict with the interests of the company. Such a conflict of interest may arise in particular from secondary employment or close personal, family or friendly contacts. If an employee puts his or her personal interests above those of the company, this can be detrimental to the company.

## WHAT WE DO FOR IT

- We keep business and personal interests strictly separate.
- We are transparent and fully disclose potential conflicts of interest to our supervisor so that they can be properly evaluated and potential action taken to eliminate or mitigate the conflict.
  - We do not use our work for Stroer for our own personal benefit.
  - We inform the Human Resources Department of all secondary employment and obtain their approval.



## 3.6 Datenschutz



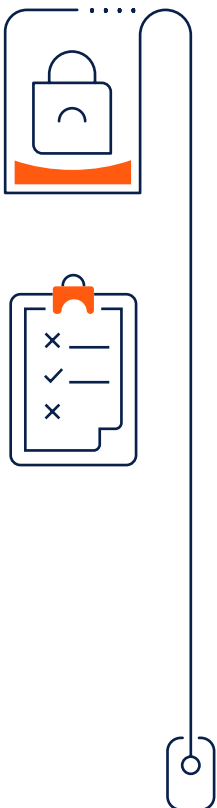
### IN BRIEF

We are committed to our data stewardship.

### BACKGROUND

We are aware that compliance with applicable data protection laws is our responsibility.

Data protection and the confidentiality of the information entrusted to us are of great importance to us. We process data in accordance with the requirements of the applicable data protection laws and are committed ensure to appropriate data security measures.



### WHAT WE DO FOR IT

- We respect data protection as a personal right.
- We comply with applicable laws and regulations when collecting, storing, processing or transferring personal data and information.
- We are committed to protecting the information entrusted to us through appropriate technical and organizational measures.
- We support our employees in the handling of personal data through clear regulations as well as advice and support from the data protection organisation.

3.7

# Information Security

## IN BRIEF

We handle information responsibly.

### BACKGROUND

We proactively protect our information, particularly from risks such as destruction, theft, unauthorized access, unauthorized disclosure, and other misuse, through reasonable and appropriate security measures.

In this way we protect the values of our company and strengthen the trust of our business partners, users and employees.

### WHAT WE DO FOR IT

- We adhere to internal information security policies and guidelines.
- We observe and do not circumvent security measures such as passwords, approved technologies and licensed software.
- We never share our personal (access) data with third parties.
- We secure our tools and do not leave them unattended. The same applies to important documents in printed form.
- We do not use the IT systems provided by the company to perform business tasks for personal purposes that are inappropriate or unlawful.
- We report anomalies and breaches promptly and in accordance with applicable information security policies.

3.8

# Material and intellectual property



## IN BRIEF

We treat the property and other assets of the company responsibly.

## BACKGROUND

In our day-to-day business, we use both tangible property (such as work equipment) as well as intellectual property (such as patents) of the Stroer Group. We therefore handle the Company's property and other assets responsibly. The unauthorized disclosure of intellectual property can also lead to high damages and possibly consequences under labour laws.

## WHAT WE DO FOR IT

- We take care to handle company property responsibly and with due diligence.
- As a general rule, we observe that company property may only be used for business purposes, unless, there is a regulation that allows private use.
- We'll do whatever it takes, to protect company assets and report any misuse or misappropriation.
- We ensure that when using the property rights of third parties, there is always an effective agreement with the rights holder and that this is appropriately documented.



# ▶ 3.9 Prevention of money laundering, export controls and economic sanctions

## IN BRIEF

We prevent money laundering and comply with applicable export control regulations.

## BACKGROUND

Cross-border economic transactions are subject to restrictions, authorisation requirements or other monitoring measures under foreign trade law. In addition, national and international laws exist to combat money laundering and terrorist financing. We use appropriate procedures and tools to ensure that we can identify and report suspicious cases at an early stage. Transactions with persons or companies on sanctions lists or similar lists are strictly prohibited.

## WHAT WE DO FOR IT

- We do not make or accept cash payments.
- We take reasonable steps (such as using a sanctions list screening tool) to ensure that transactions with third parties do not violate applicable economic embargoes, sanctions lists or trade, import and export control or counter-terrorist financing regulations.
- We do not do business with individuals, companies or organizations that are associated with money laundering or terrorism, or whose funds may be derived from criminal activity.
- We carry out appropriate money laundering checks and suspicious activity reports where necessary.
- We are vigilant and report suspicious transactions and suspicious circumstances to our supervisor, legal or compliance organization.





3.10

# Accounting and reporting

## IN BRIEF

We ensure complete and correct accounting and timely reporting.

## BACKGROUND

As a publicly traded company, we are required to prepare our financial statements in accordance with the law and applicable accounting standards. In addition, all information and public disclosure in this context must be complete, accurate and timely. Reliable business and accounting documents are also the basis for our business decisions and the trust our business partners place in us.

## WHAT WE DO FOR IT

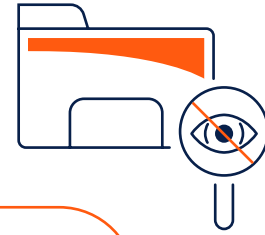
- We record all business transactions in accordance with applicable laws and the accounting standards relevant to us.
- We ensure that our records contain all necessary information about the respective transactions (transparency and correctness).
- We organize our processes in such a way that all business financial data can be recorded correctly and on time in the accounting system.
- We cooperate fully with the auditors, the auditing authorities, and the internal audit.





3.11

# Insider Trading



## IN BRIEF

We do not use confidential information to gain advantage in stock trading.

## BACKGROUND

The use or disclosure of information in the acquisition or sale of shares or other securities is subject to strict legal requirements. Insider information is precise information about circumstances not known to the public that would be capable of influencing the stock market price if it became known.

## WHAT WE DO FOR IT

- We do not tolerate any misuse of insider information about Stroer.
- We treat course-related information about Stroer as highly confidential and do not disclose it to employees or outsiders such as family members or friends.
- We note that as employees we are not permitted to trade in Stroer shares or Stroer securities if we have knowledge of insider information, and we know that we would otherwise be liable to prosecution.
- We publish insider information without delay by means of an ad hoc announcement within the scope of our legal obligations.
- If we have any questions or uncertainties, we contact the compliance organization.
- We observe applicable blocking periods with regard to the trading of Stroer shares or Stroer securities.



## 3.12 Donations und Sponsoring

### IN BRIEF

Donations and sponsorships are made transparently and within the framework of our internal regulations.

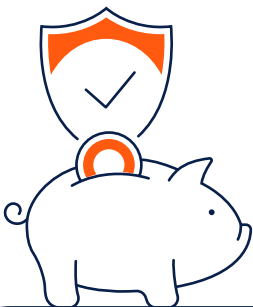
### BACKGROUND

We make donations and sponsorships with the aim of fulfilling our social responsibility and to positively shape our reputation and public perception. Through internal processes and controls, we ensure that such activities take place within the framework of legal regulations.



### WHAT WE DO FOR IT

- We make sure that donations are made on a voluntary basis and without anything in return.
- We do not pursue any economic self-interest with our donations.
- We donate exclusively to charitable and recognized institutions.
  - In case of sponsoring activities, we contractually document whether and what compensation is to be provided in return.
  - We exclude donations to anti-constitutional, inhuman or immoral organizations or associations of any kind.
  - We follow the internal approval process for donations or sponsorships.



## 3.13 Political engagement (lobbying)

### IN BRIEF

We distance ourselves from unfair influence on politics and legislation.

### BACKGROUND

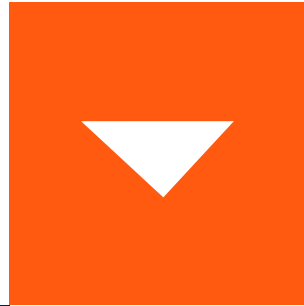
As a nationally and internationally active company, we are part of the global, political and social environment and contribute to political and public opinion-forming processes as a credible and reliable partner in dialog. We always do this in a transparent manner and follow the legal regulations on lobbying.

### WHAT WE DO FOR IT

- We are neutral in our dealings with political parties and interest groups.
- We distance ourselves from unfair influence on politics and legislation.
- We take care to ensure that our actions cannot be construed as unlawful or unfair influence.
- We disclose our activities in the relevant transparency registers.



# 04



## CONFIDENTIALITY AND COMMUNICATION

- 4.1 Confidentiality and non-disclosure
- 4.2 Communication with the public
- 4.3 Communication in everyday work

## 4.1 Confidentiality and non-disclosure

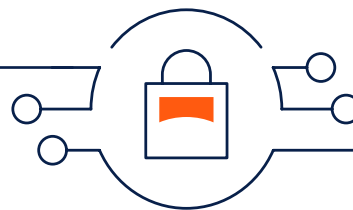


### IN BRIEF

We protect confidential information and the reputation of our company.

### BACKGROUND

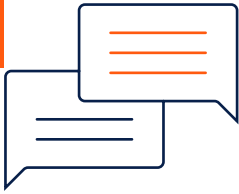
Confidential information is non-public information that is only intended for a restricted group of people. In particular, employees who have access to particularly confidential information are obliged to observe strict confidentiality – also internally.



### WHAT WE DO FOR IT

- We take care to protect business secrets and to treat them as strictly confidential.
- We ensure that confidential information is only made available internally to a restricted group of people.
- We enter into confidentiality agreements in the event that confidential information is exchanged with third parties.
- When sending e-mails, we ensure that confidential texts and attachments are only sent to authorized persons. Where appropriate, we encrypt sensitive content.
- We do not communicate confidential or sensitive Company information when using social networking sites or the like.
- We only share company information when we are sure we are allowed to share it, even among colleagues.
- We will inform the appropriate supervisor, the Legal Department or the Compliance Organization if we suspect that confidential information has come to the attention of unauthorized persons.

4.2



# Communication with the public

## IN BRIEF

We align external publications in advance to protect the company.

## BACKGROUND

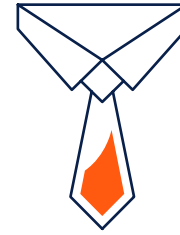
Communication on behalf of the company entails numerous legal, regulatory and financial risks. Public communications must therefore always be aligned with corporate communications; this applies in particular to press and media inquiries. Communication with investors takes place exclusively via the Investor Relations department.

## WHAT WE DO FOR IT

- We forward all press inquiries and requests from media representatives to Corporate Communications, which generally coordinates them.
- We generally inform the Investor Relations department in the event of enquiries from investors.
- We do not communicate any operational, strategic or financial information to the outside world.
- We do not make statements, whether online (on social media), via public speaking, or otherwise, unless we are authorized to do so.



## 4.3 Communication in everyday work



### IN BRIEF

We ensure a uniform, respectful and professional appearance both internally and externally.

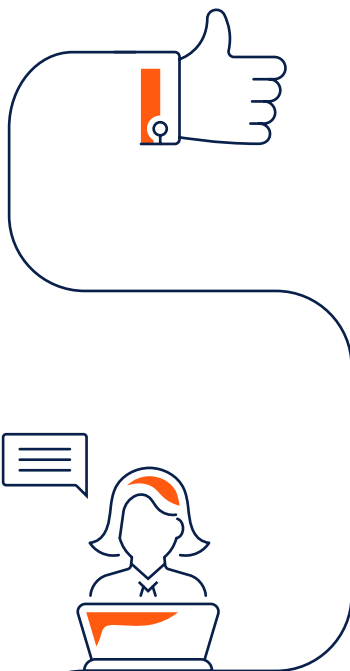
### BACKGROUND

Our communication is an essential part of our company's success. As part of our general communication with employees, customers, suppliers and business partners, we always ensure that we treat each other with respect. In the context of business communication, the guidelines for corporate communication must be observed and the communication tools provided must be used.

We refrain from making statements that are harmful to the company and protect confidential company information.

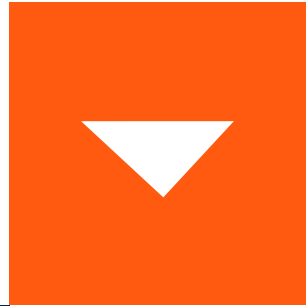
### WHAT WE DO FOR IT

- We always communicate in an appreciative manner.
- We respect the achievements of our partners in dialogue and respect their professional and personal reputation.
- We pay attention to a uniform and professional external appearance of the company and adhere to the valid communication standards.
- For the communication with our business partners we use exclusively the means of communication of the company e.g. professional e-mail addresses.
- We are aware of our responsibility for the company's reputation and do not disclose confidential or sensitive company information when using social media. In addition, we respect the privacy of third parties.





# 05



## MEDIA-SPECIFIC REGULATIONS

- 5.1 Journalistic ethics
- 5.2 Independent and responsible reporting
- 5.3 Advertising and product placements

## 5.1 Journalistic ethics



### IN BRIEF

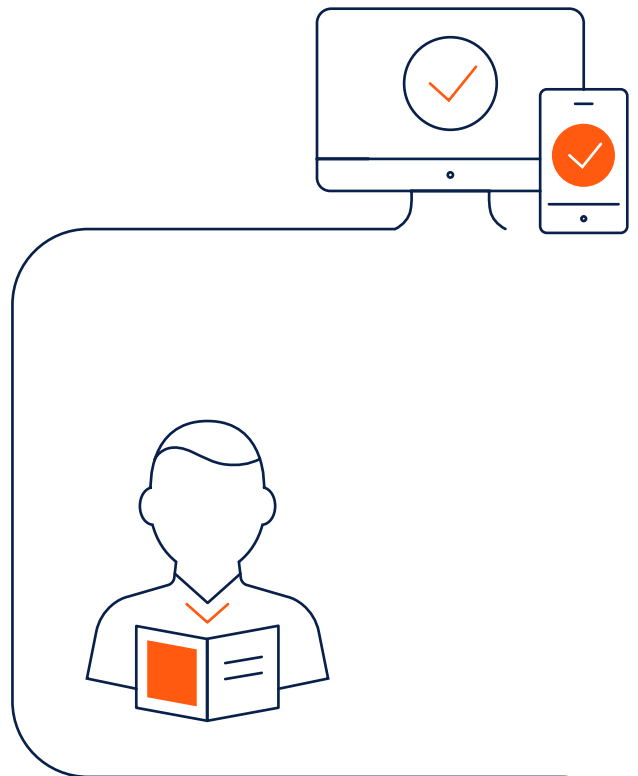
We respect the truth, the safeguarding of human dignity and the truthful communication of information to the public.

### BACKGROUND

Our news journalism reports truthfully. Facts are described without judgement or interpretation. We avoid inappropriate portrayals that can hurt people's honour. The defamation of religious, ideological or moral convictions is contrary to our journalistic values. We respect people's privacy and right to informational self-determination.

### WHAT WE DO FOR IT

- We report truthfully, we give news without own evaluation and interpretation.
- We always report in a balanced manner and do not follow any ideologies or supposed majority opinions in the selection of content and presentation.
- We condemn the defamation of religious, ideological or moral beliefs, as these are contrary to our journalistic values.
- We design access to our content to be as barrier-free as possible.



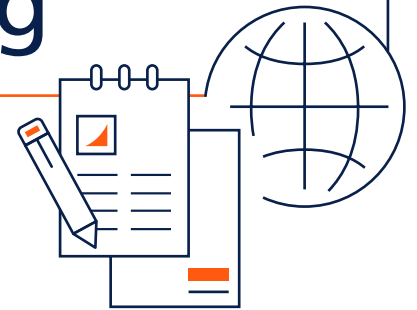
## 5.2 Independent and responsible reporting

### IN BRIEF

Editorial and journalistic independence are cornerstones of our reporting.

### BACKGROUND

We are aware of our responsibility with regard to editorial and journalistic independence. Contributions to our journalistic services and topic-specific information portals are checked for content, origin and truth with due journalistic care.



### WHAT WE DO FOR IT

- We take care to ensure that our reporting is not influenced by the private or business interests of third parties or by personal economic interests.
- We exclude the acceptance of benefits of any kind that could influence our journalistic or publishing decisions.
- We ensure that our reporting is based on verifiable information and present conflicting views transparently.
- We observe the requirements for suspicious activity reporting established by case law.
- We provide special protection for children and young people in our society. We therefore consider the possible effect on children and young people regarding the content and design of articles.



# Advertising and product placements

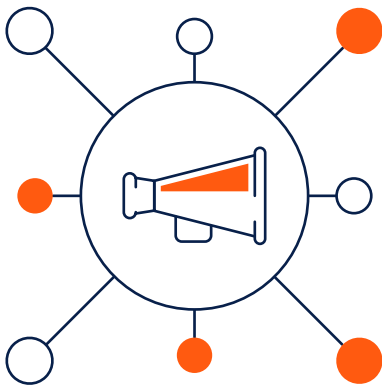


## IN BRIEF

We adhere to existing rules on the separation of advertising and editorial content.

## BACKGROUND

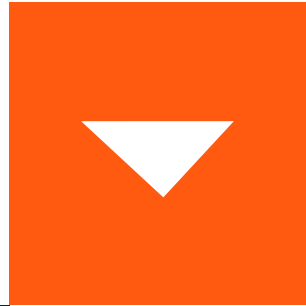
We strictly separate advertising and editorial text. We design publications for advertising purposes in such a way that they are recognizable as advertisements.



## WHAT WE DO FOR IT

- We clearly mark all advertising formats with an ad reference.
- We transparently identify publications that follow a self-interest of our publishing services as such.
- We carefully observe the boundaries of "surreptitious advertising" in editorial publications.

# 06



## SUSTAINABILITY AND ENVIRONMENT

- 6.1** Environmental management
- 6.2** Product-related environmental impacts
- 6.3** Operational environmental impacts

## 6.1 Environmental management



### IN BRIEF

Protecting the environment and the climate is part of our group-wide sustainability strategy.

### BACKGROUND

Our environmental management aims to avoid negative ecological effects of our business activities or, if immediate avoidance is not possible, to continuously reduce them. Reliable compliance with all legal requirements is our aspiration. In addition, we want to lead the way in climate protection with ambitious goals and measures.

### WHAT WE DO FOR IT



- We have integrated environmental and climate protection as a central pillar in our sustainability strategy and set ourselves group-wide targets.
  - We have established a systematic management system to monitor and record significant environmental and climate-related impacts of our business activities throughout the group and to reduce environmental impacts.
  - We comply with applicable local, national and/or international environmental, health and safety instructions.
- We raise our employees' awareness of environmental issues such as energy efficiency, sustainable mobility, and waste disposal.
  - We regularly disclose our environmental performance as part of our sustainability reporting.
  - We are applying our requirements for appropriate environmental management to our suppliers and business partners.

## 6.2 Product-related environmental impact



### IN BRIEF

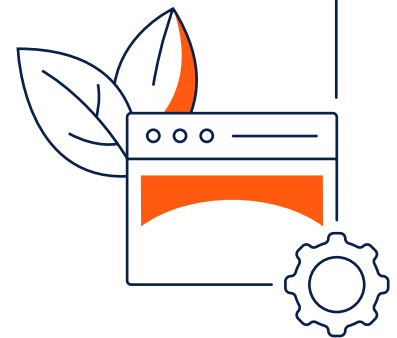
Our products are as safe and environmentally friendly as possible.

### BACKGROUND

It is important to us that our products are as environmentally compatible and safe as possible throughout the entire value chain. We reliably comply with the associated statutory provisions.

### WHAT WE DO FOR IT

- We take care to ensure that our products and services are as safe and environmentally compatible as possible, in terms of development, production, use, transport and disposal.
- We comply with applicable local, national and/or international product-related environmental, health and safety regulations.
- We use our products' reach to raise awareness of environmental and climate protection among customers and the public. We also add functions to our advertising media and street furniture that make a positive contribution to people and the environment.
- We raise awareness and train relevant employees, suppliers or business partners on product-related environmental and safety issues in order to ensure compliance with our duty of care towards people and the environment in our daily work.



6.3

# Operational environmental impact



## IN BRIEF

We are continuously improving the environmental performance of our operations.

## BACKGROUND

We as the Stroer Group are characterized by an ecological footprint that is small compared to other industries. Nevertheless, we are firmly committed to minimizing any negative ecological impact caused by our operations.

## WHAT WE DO FOR IT

- We comply with applicable local, national and/or international environmental, health and safety regulations at all our sites.
- We record environmental and climate-related effects from operations at our sites and systematically reduce environmental impacts such as air, noise, or greenhouse gas emissions.
- We continuously improve our operational processes to increase efficiency and avoid environmental impacts in advance.
- We design our manufacturing, maintenance and disposal processes in a way that protects people and nature from hazards.
- We raise awareness or train relevant employees on operational environmental issues.





# WHISTLEBLOWING AND PROTECTION OF WHISTLEBLOWERS

07



Our Stroer whistleblower system enables you to report possible compliance violations in an uncomplicated and, if you wish, completely anonymous manner.

## Compliance-Hotline

Simply scan here



### THE HINT - PROCESS



01

#### Note report

receipt of message (internal & external) via <https://compliance.stroer.de> or other channels



02

#### Analysis

Dispatch of an acknowledgement of receipt within 7 days and initial analysis of the report by the central compliance team for relevance



03

#### Assessment

In-depth analysis and, if necessary, involvement of decentralized compliance officers



05

#### Completion

Feedback to the whistleblower within 3 months



04

#### Measures

Initiation of appropriate measures and, if necessary, forwarding to GRC committee or authorities



We take reports seriously and whistleblowers do not have to worry that they might experience disadvantages as a result of their report. The whistleblower system also gives you the opportunity to submit reports completely anonymously.

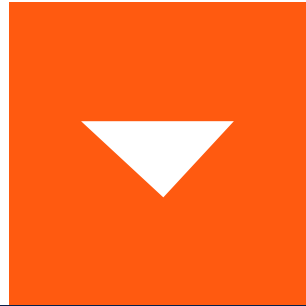


Through high security and data protection standards, we ensure that your messages are protected from unauthorized access and that personal data is used in accordance with the applicable regulations.



You can find more detailed information on the process in our guidelines on the whistleblower system.

08



# CONTACT PERSONS AND FURTHER INFORMATION

## CONTACTS IN YOUR LOCAL WORKING ENVIRONMENT

- Your supervisor
- Your management
- Your local compliance officers
- Your human resources, legal, finance or audit department
- or, where available, the works council

## CONTACTS PERSONS OF STROEER SE & CO. KGAA/ THE BUSINESS UNITS

### Central function Compliance

Stephan Schnitzler  
Katharina Trost

### Cluster Compliance Officer

OOH: Oliver Ucke  
Stroeer Poland: Grzegorz Mikietyński  
blowUp media: Nils Nerkamp  
Door-to-Door: Tim Wedel  
Call-Center: Olaf Strehle  
Digital Marketing: Sebastian Barth  
Content: Tobias Pawlik  
Data-as-a-service: Frauke Harms  
eCommerce: Andrea Wildmoser  
Stroeer SE & Co. KGaA: Katharina Trost

### Data Protection

Stephan Kuchenbuch

### Legal Department

Anne Ossenberg

### HR Stroeer Group

Birgit Oßendorf-Will

### Corporate Communications

Marc Sausen

### Investor Relations

Christoph Lührke

**The Stroeer Code of Conduct cannot answer all questions that may arise in the course of your daily activities. The general provisions of the Stroeer Code of Conduct are therefore further specified in group-wide guidelines.**

**You can find all information, news and compliance guidelines on the Stroeer intranet at (or on your cluster's intranet):**

**[Overview](#) > [Governance, Risk & Compliance](#) > [Compliance](#)**

Status: June 2024