



MEDIA GROUP

## **RULES OF PROCEDURE FOR SUBMITTING A CONCERN**

in accordance with the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz – "LkSG") for Heinrich Bauer Verlag KG ("HBV") and all group companies of Bauer Media Group.

### **Background**

Compliance with the LkSG is a top priority for HBV. Violations must be identified at an early stage in order to initiate appropriate remedial measures and prevent possible damages to those affected by violations, employees, business partners, customers, the company and other third parties.

If you have specific indications that violations of obligations related to human rights and the environment are taking place, or that there is any risk of such violations, we ask you to notify us on the below channels. We also value corresponding information on business partners, customers and other third parties. We rely on your attention and cooperation for this.

As part of a transparent process, our complaints procedure protects those affected by the risks and violations in question as well as the ones who raise a complaint. All complaints will be dealt with quickly and confidentially by trained experts.

Below you can find the most important information on our complaints procedure.

### **Scope of the complaints procedure**

The complaints procedure can be used to report human rights or environment-related risks or violations of human rights or environment-related obligations, both within our own business and along our entire supply chain for HBV and its Group companies.

Human rights risks here include in particular:

- the violation of the prohibition of child labor
- the violation of the prohibition of forced labor and all forms of slavery
- the disregard of occupational health and safety and work-related health hazards
- the disregard of freedom of association and the right to collective bargaining
- the violation of the prohibition of unequal treatment in employment
- the violation of the prohibition on withholding a fair wage
- the destruction of natural livelihoods through environmental pollution

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- the unlawful violation of land rights
- the violation of the prohibition on hiring or using private/public security forces, which can lead to adverse effects due to a lack of instruction or control.

Environmental risks are particularly related to mercury, persistent organic substances (POPs), and hazardous waste.

### **Complaint channels**

The following channels can be used to submit a concern or complaint:

By mail or by internal mail to Melanie Dörholt:

Heinrich Bauer Verlag KG  
Mailbox 6486  
Burchardstrasse 11  
20077 Hamburg

By e-mail at the following address: [whistleblowing@bauermedia.com](mailto:whistleblowing@bauermedia.com)

### **Confidentiality**

Regardless of the communication channel chosen by the person submitting a concern ("whistleblower"), we treat all information confidentially. However, we are required to comply with legal obligations to provide information to authorities and legal exceptions to the confidentiality requirement.

Confidentiality of the whistleblower's identity is maintained throughout our entire process. Confidentiality also includes persons who are the subject of a complaint and other persons named in the complaint. Only authorized staff will have access to complaints submitted via our complaint channels.

All information shall be processed in compliance with the principle of confidentiality. The persons appointed by the company to carry out the complaint procedure are impartial, i.e. they are independent in the performance of their duties and are not bound by instructions from their managers.

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Personal information that enables identification may only be disclosed on a "need to know basis" if this is necessary for the investigation of the complaint and is in line with data protection requirements. Processing of complaints will be in accordance with applicable data protection laws.

Unnecessary exposure and damage to reputation must be avoided.

### **Processing of the report**

Once a complaint is received via the complaint channels, its receipt is documented internally.

### **Acknowledgement of receipt**

Irrespective of the chosen communication channel, persons submitting a complaint receive an acknowledgement of receipt as soon as their information has been received. This can be in writing (for non-anonymous reports) or by e-mail, depending on which complaint channel you have chosen.

### **Review of the report**

The employees entrusted with the implementation of the complaint procedure will examine the communicated facts. The complaint received will be classified and prioritized according to subject matter and severity.

If an examination is not possible due to a lack of sufficient information, the employee entrusted with the implementation of the complaint procedure will contact the person submitting the complaint to request further information, if possible.

If neither sufficient fact-based information is available nor contact is possible, the compliance case will be closed due to lack of substantiation.

### **Review/Investigation**

The employee in charge of conducting the complaint procedure shall comprehensively review the facts of the case and ensure that all reports are appropriately investigated. He or she

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discusses the facts with the person submitting the complaint, in the case of anonymous reports only to the extent possible without breaching confidentiality.

The employees entrusted with the implementation of the complaint procedure are bound by the principle of confidentiality, are impartial and are not subject to directives from their managers. They are also obliged to comply with data protection regulations and to ensure transparency and the rights of all persons affected. This includes the protection of the whistleblower.

If, after clarification of the facts, discussion and investigation, the employee responsible for conducting the complaint procedure is convinced that there are no risks relating to human rights or the environment nor violations of human rights or environment-related obligations in the company's own business unit or along the supply chain, the whistleblower will be informed in writing or by e-mail. In this case, the procedure will be discontinued.

If the investigation confirms human rights and environment-related risks or violations of human rights or environment-related obligations in our own business or along the supply chain have occurred, appropriate follow-up measures (preventive and remedial measures) will be initiated. In individual cases, this may also include appropriate disciplinary measures.

A proposal for remedial action can be developed in exchange with the whistleblower.

The processing time depends on the case and can take from a few days to several months, depending on the complexity of the case. However, we endeavor to complete the processing in a timely manner.

The whistleblower will be informed once the complaints procedure ends.

### **Whistleblower rights**

We will ensure that employees who have raised suspected or actual LkSG-relevant misconduct in good faith are protected from any intimidation or retaliation, even if the reported suspicion is not confirmed. "In good faith" means that the person submitting a complaint is convinced that the account is true, whether or not a subsequent investigation

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confirms their account. Knowingly making a false report of an LkSG violation for the purpose of intentionally and untruthfully accusing another person is a compliance violation and will be subject to appropriate action in the case of employees.

Intimidation and retaliation against employees who report actual or suspected misconduct in good faith will not be tolerated.

If you feel that you are experiencing intimidation or retaliation as a result of your reporting of LkSG concerns, contact Ms. Melanie Dörholt.

Where whistleblowers are concerned who are employees of a supplier along our supply chain, we will endeavor to make appropriate contractual arrangements with the supplier.

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