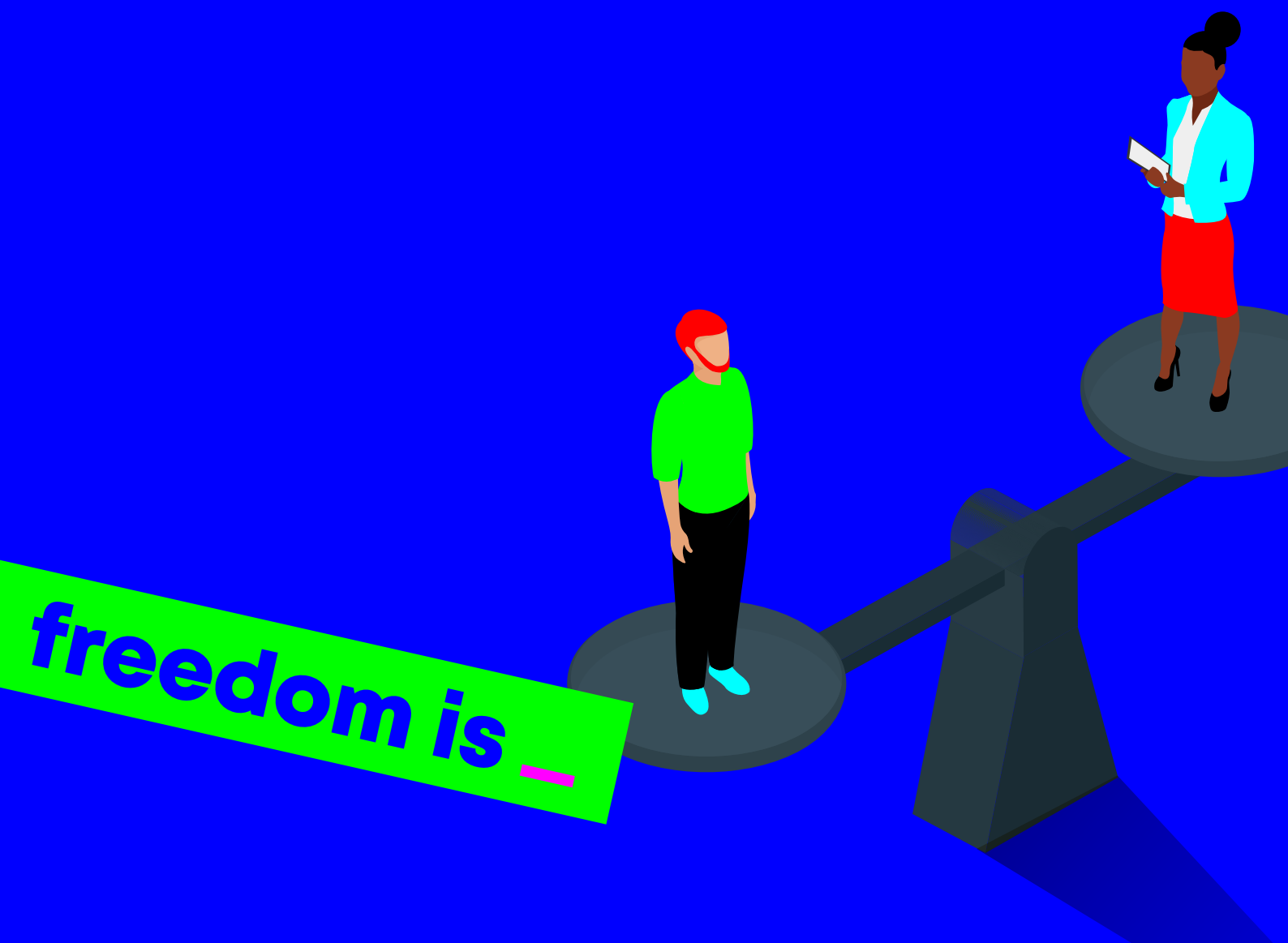


# Policy statement on human rights strategy



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## 1. Our commitment

Axel Springer<sup>1</sup> is a media and technology company with units, investments, and licenses in more than 40 countries that provides information services through our diverse media brands (including BILD, WELT, INSIDER, POLITICO) and classified portals (StepStone Group and AVIV Group) to help people make free and informed decisions in life. We<sup>2</sup> bear a special responsibility in our actions as employees and managers. Particularly in our journalistic offerings, we demand that others maintain high ethical standards. That's all the more reason for us to set high standards to our own actions as well.

We are committed to responsible corporate governance. This is fundamentally based on integrity and lawful conduct. For us, this also includes a commitment to an environmentally friendly and thus livable and free future for current and future generations.

At Axel Springer, we respect the values of the [Universal Declaration of Human Rights](#) and are committed to good corporate governance. We are committed to complying with internationally recognized social standards and, in particular, protecting the legal positions set out in the German Supply Chain Due Diligence Act (SCDDA). We have long expressed this in the [Axel Springer Code of Conduct](#), which applies to all employees. The UN Global Compact and the [Declaration on Fundamental Principles and Rights at Work of the International Labor Organization](#) (ILO) serve as a basis. We also support the [UN Guiding Principles on Business and Human Rights](#) and strive to incorporate them into our own policies and processes.

### Taskforce „Responsible Procurement“

Since 2021, the Responsible Procurement Taskforce has been preparing for the implementation of the SCDDA. In the taskforce, central functions (Procurement, Sustainability, Compliance, Risk Management) work closely with representatives of local procurement units with the aim to improve sustainability in our procurement processes and our supply chains. Priorities include ensuring the transparency of supply chains, conducting risk analysis of our own business units and suppliers, and identifying and taking preventive and remedial action.

### Risk management

In addition to the risk analyses and assessments carried out by the taskforce, we at Axel Springer have implemented a risk management system based on nationally and internationally recognized standards and frameworks. It is designed to identify and assess all significant and potentially existentially threatening risks as early as possible, so that appropriate countermeasures can be taken. While the overall responsibility for effective risk management lies with the Executive Board, the respective divisions or units

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<sup>1</sup> In this Supplier Code of Conduct, *Axel Springer* always means Axel Springer SE and all controlled companies of the Axel Springer Group.

<sup>2</sup> We refers to all Axel Springer employees, managers, and members of management bodies. For the sake of simplicity, only the masculine form is used; all references to the masculine form are deemed to include people of all sexual identities.

of Axel Springer are responsible for the operational management of individual risks. The respective divisional management and management of our units are required to participate in our semi-annual, systematized and standardized risk surveys. These include the early detection, identification, and assessment of risks specific to a particular division or company, the definition, management and control of adequate measures, and appropriate documentation and reporting. Significant ad hoc changes in the respective risk situation must be reported immediately to corporate risk management.

In addition to our regular Group-wide risk management process, we have started an initial risk analysis regarding the legal positions protected under the SCDDA. Going forward, the analysis of human rights and environmental risks will be incorporated into our risk management system. We will monitor and review the potential for such risks that may arise in our own business area and at our direct suppliers once a year and on an ad hoc basis. For this purpose, a risk mapping exercise will be carried out according to locations, business areas and product groups. The identified risks will be assessed and prioritized and communicated internally to the relevant decision-makers (Executive Board, divisional management, management, and procurement).

If the standard risk analysis identifies a risk (as prioritized in accordance with the principle of appropriateness) in our own business area and/or at one of our direct suppliers, adequate preventive measures will be taken without undue delay, and the relevant management will be responsible for the effective implementation thereof. We will review the effectiveness of any preventive measures annually and on an ad hoc basis, as needed (e.g., significant change in risk profile due to new business expansion). These measures will be updated in a timely manner, as necessary.

In the event a past or present violation of a human rights-related or environmental obligation is ever identified in our own business or at one of our direct suppliers, immediate and appropriate remedial action will be taken to end and/or minimize the extent of the violation.

Furthermore, we reserve the right to conduct an ad hoc risk analysis and implement appropriate preventive measures should we become aware of a violation of a human rights-related or environmental obligation by an indirect supplier.

## **2. Our commitment to respect human rights in our own business units**

### **Human rights**

We respect human rights and affirm that every human being without exception is entitled to the rights and freedoms proclaimed in the United Nations Universal Declaration of Human Rights.

Tolerance of different opinions and a commitment to democratic principles and the rule of law are the basis of our work - not only in our dealings with colleagues, but everywhere and at all times.

### **Equal opportunity and respectful treatment in the workplace**

Each employee at Axel Springer is given equal opportunity to develop and expand their skills, irrespective of their ethnicity, skin color, gender, age, marital status, disability, religion, nationality, sexual orientation, and social background. Discrimination in whatever form is unacceptable. We see our diversity as a success factor.

The Axel Springer Code of Conduct encourages the respectful treatment of others at all times. It is the central guiding framework for responsible conduct in the Company and applies to all employees worldwide.

At Axel Springer, we deal with each other in a trusting, empathetic and open manner. We show each other courtesy, respect and consideration. We prohibit any form of physical and verbal abuse and harassment in the workplace or the threat thereof.

Diversity & Inclusion (D&I) is a corporate priority. Axel Springer has established a department dedicated to D&I to drive and integrate such priorities throughout the Company.

We aim to be a pioneer in efforts to achieve work-life balance and support our employees in putting their skills to the best possible use in contributing to the company's success. To this end, units and divisions at Axel Springer offer a variety of childcare and other familial support programs dedicated to this goal.

### **Fair working conditions**

We ensure fair working conditions.

#### **Prohibition of child labor**

We do not tolerate child labor and strictly comply with local laws and regulations on minimum age.

Axel Springer has specific company-wide policies and procedures to ensure that underage individuals are solely employed in legally compliant and appropriate contexts, such as internships and apprenticeship. All HR employees receive regular internal and external training to ensure compliance with existing laws and are informed of any changes.

#### **Prohibition of forced labor**

In our recruiting and hiring processes, we ensure that employees conclude their employment contracts with Axel Springer voluntarily. All employment relationships can

be terminated with reasonable notice. We are strictly opposed to forced or compulsory labor and any form of slavery, including modern forms of slavery and human trafficking. Our employer practices are guided by the ILO core labor standards.

### **Wages and salaries**

Our wages and salaries are at or above the respective national legal minimum standards. We comply with all applicable local labor laws regarding work performance, hours, time off, vacations and other terms and conditions of employment. We use organizational precautions and existing instructions to ensure compliance with occupational health and safety, social security and tax regulations.

### **Employee representation**

We respect our employees' right to set up, join and be actively involved in a labor union. The exercise of these rights must not lead to discrimination or retaliation against the employee. We foster a fair and constructive partnership based in trust with such unions.

### **Workplace safety**

We take the required measures at all places of work to prevent work-related accidents and illnesses, whether physical or psychological. Axel Springer offers a wide range of activities to promote the health of our employees specific to individual countries and departments. Our employees also contribute to ensuring a safe working environment and take health protocols seriously. We maintain specific policies and requirements pertaining to high-risk working conditions.

### **Sustainability**

Axel Springer has set ambitious climate targets. Among other things, we intend to be climate-neutral and to reduce our carbon footprint in the long term. Sustainability is a key corporate value for us. We monitor not only human rights but also environmental due diligence obligations in each of our business units.

Our goal is to minimize the impact of our activities on humans and the natural world. We promote the sustainable use of natural resources. This includes actively encouraging our suppliers to use environmentally friendly practices in the production of raw materials. We strive to use eco-efficient technologies and materials to protect the environment, with a focus on resource conservation, recyclability, and sustainability wherever possible. To minimize our impact on the environment, we reduce energy and water consumption, emissions, and waste.

Our strategic understanding of sustainability as well as our targets and measures can be found in the Sustainability Report 2021, which has been prepared in accordance with the international standards of the Global Reporting Initiative (GRI).

### **3. Our commitment to respect human rights in the supply chain**

The [Axel Springer Supplier Code of Conduct](#) sets forth our standards and expectations for our business partners. This Code sets out the minimum requirements and obligations with regard to upholding human and labor rights, providing employees with a safe and healthy working environment, and observing environmental due diligence obligations.

Our business partners must ensure the implementation of and compliance with our Supplier Code of Conduct as a precondition to their relationship with Axel Springer. If necessary, we reserve the right to review compliance with the Supplier Code of Conduct and to take appropriate measures in the event of a violation. Further details can be found in the Axel Springer Supplier Code of Conduct.

### **4. Complaints mechanism**

At Axel Springer, we maintain an open approach and an honest exchange with each other. We encourage feedback, criticism, and reporting of possible misconduct to be addressed openly with superiors and colleagues. In addition to direct supervisors, various channels are available for reporting suspected violations of rules or laws, including human rights violations and environmental violations. Our multilingual, [internet-based whistleblowing system](#) enables both employees and external persons, including employees of a direct supplier or employees of an indirect supplier, to report violations and undesirable developments confidentially – and, if desired, anonymously.

Employees can also contact their direct supervisors, the Chief Compliance Officer, local compliance officers, members of the Compliance Committee, the works council, and an external ombudsman.

The Compliance Team will follow up on every report and suspicion of misconduct. Each report is treated with the utmost confidentiality and care. Among other things, Group Company Agreements and the Rules of Procedure of the Compliance Committee regulate the details of the procedure for an internal investigation.

The effectiveness of the complaints procedure is reviewed by the Compliance Team annually and on an ad hoc basis if we anticipate a significant change in the risk situation in our own business area or at one of our direct suppliers.

### **5. Documentation and reporting**

We document the fulfillment of our due diligence obligations on an ongoing basis. In addition to the annual reporting to the Executive Board by the *International Human Rights Committee*, consisting of the Compliance Committee (Chief Compliance Officer, General Counsel, Head of Corporate Audit & Risk Management, Head of Global People & Culture and a rotating operational executive, currently CFO Awin AG) and the Head of Corporate Procurement, we will publicly report annually on our due diligence activities in our own operations and within our supply chain. We will also disclose the results of the supply chain risk assessment, describe our mitigation measures for identified risks, and evaluate their effectiveness.

## 6. Scope and responsibilities

This Policy Statement applies throughout the Group. The implementation of the measures listed in this policy statement is the responsibility of managers and employees - both central and decentral in the various segments and units. We ensure that each area of Axel Springer is aware of its own responsibility for respecting human rights, in particular all legal positions arising from the SCDDA, and their daily implementation.

The *International Human Rights Committee* established at Axel Springer monitors the implementation and effectiveness of risk management regarding human rights and environmental risks. It also coordinates the regular reporting to the Executive Board.

Questions and comments on this Policy Statement or on other human rights-related topics can be directed to the Compliance Department by e-mail.

This Policy Statement was adopted by the Axel Springer Executive Board on 05.12.2022. It is reviewed regularly and revised in accordance with the results of the risk analysis.

## 7. Further Links

- [Axel Springer Code of Conduct](#)
- [Axel Springer Supplier Code of Conduct](#)
- [Axel Springer Sustainability Report](#)
- [Axel Springer Whistleblowing System](#)