

INFORMATION FOR WHISTLEBLOWERS

1. Why is it useful to make a report?

Your report enables us to become aware of potentially harmful behavior. Raising concerns will help us to detect potentially illegal, unethical or inappropriate activities and to adopt mitigating measures swiftly.

2. What can be reported?

You can, and are encouraged, to supply any information on possible illegal unethical or inappropriate activities. These include, for example, instances of corruption, bribery, embezzlement, and fraud, as well as discrimination and harassment, mobbing, cartel violations, insider trading, money laundering, tax evasion, balance sheet fraud or the theft of intellectual property.

In addition, our whistleblowing system is open for any kind of complaint with regard to risks concerning human rights and the environment. The complaints mechanism for issues concerning such issues under the German Supply Chain Diligence Act (LKSG) can be reviewed [here](#).

3. Can I also report a compliance violation anonymously?

It is possible to file an anonymous report via our electronic whistleblowing system. Please make sure to note the access information provided to you by the electronic system when filing the report, as you will not be able to access the tool without such information (and we do not have any possibility to retrieve it).

Please note, however, that it is generally easier to process reports if you do not submit them anonymously.

4. What happens to my report?

If you make a report via the electronic whistleblowing system, the report will be received by Group Compliance. Group Compliance will carefully examine the report in accordance with the requirements of the processing instructions of the internal Compliance Incident Management and, if necessary, will initiate the appropriate measures.

5. Will my data be treated in confidence?

Your data will be treated confidentially and protected in accordance with the relevant European and national data protection regulations, in particular the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act.

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6. Will the people affected by my report be informed?

As a matter of principle, the persons concerned are not informed about who has submitted a report. Please note, however, that defendants will be confronted with the allegations raised against them in order to protect their rights of defense, namely the right to be heard, for example during interrogations by law enforcement authorities or the police. In that case, only the persons who need to know the identity will be informed accordingly. Also, it may be necessary to inform other people about who submitted a report, e.g. if this is necessary to get further information with regard to specific facts.

7. Will my data be shared with third parties?

ProSiebenSat.1 Media SE may disclose personal data to authorities, such as the police or the public prosecutor's office (Art. 6 (1) (c) GDPR) if we are legally obliged to do so or if this is permitted under data protection law. In the course of processing a complaint or report or in the course of an investigation, it may be necessary to make information available to other employees of ProSiebenSat.1 Media SE or employees of other group companies - if the complaint or report relates, for example, to events in subsidiary companies. The latter may also be located in countries outside the European Union where different personal data protection regulations may exist. We always ensure that the relevant data protection regulations are adhered to when disclosing personal data.

The disclosure of this data is based on our legitimate interest in the fight against abuse, the prosecution of criminal offenses and the protection, assertion and enforcement of claims, insofar as your rights and interests in the protection of your personal data do not predominate (Art. 6 (1) (f) GDPR).

8. Can I suffer any retribution because of my report?

Whistleblowers acting in good faith will not be penalized or sanctioned in any way by ProSiebenSat.1 Media SE or its group companies, even if the suspected case subsequently turns out to be unfounded. A violation of this non-retaliation principle would be a compliance violation in itself.

However, we reserve the right to take legal action in the event that false information is provided despite knowledge to the contrary.

The fact that you render a report will not automatically result in immunity for you as a whistleblower with regard to disciplinary, civil law or labour law action, if you are involved in the matter. However, the fact that you despite your involvement in the matter contribute to the solving of the case will be taken into account in your favor.

9. What kind of personal data about me is processed?

The following personal data and information are collected when you make a report:

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Your name, if you have given your identity, your private or office e-mail address/phone number, if you communicate via e-mail/phone, whether you are a ProSiebenSat.1 Media SE employee (or an employee of one of its subsidiaries) and, if applicable, the names of any persons and other personal data of such persons you name in your report. We will also process any self-provided personal information about you or that of which arises from the circumstances of your report, e.g. as part of the contact information provided by you. The actual information in the report itself may also contain personal data.

10. What is the legal basis for the whistleblower system and the processing of my data?

The processing of personal data is based on the legitimate interest of ProSiebenSat.1 Media SE in the detection and prevention of corruption, bribery, embezzlement, and fraud, as well as discrimination and harassment, mobbing, cartel violations, insider trading, money laundering, tax evasion, balance sheet fraud or the theft of intellectual property. The legal basis of this processing of personal data is Article 6 (1) (f) GDPR.

As a rule, there is no right of objection to the processing of data on the basis of the so-called legitimate interest, Art. 21 (1) sentence 2 GDPR.

11. How is my personal data processed?

Your personal data will only be processed to the extent necessary to initiate the whistleblower system and to enable the relevant persons involved to perform their duties, as well as to investigate the reports in accordance with the company agreement, e.g. to legally examine the reports, patterns of behavior and potential infringements identified. Personal data will be stored for as long as it is required for the clarification and final assessment of the report unless we are otherwise entitled or obliged so to do.

12. Can I request information about the status of the conduct or the result of my report?

As a matter of principle, we try to keep you informed about the status of the proceedings and the outcome of our investigation. However, this is not always possible for various legal and confidentiality reasons. However, we will comply at least with the legal requirements set forth in the German Act on the Protection of Whistleblowers (*Hinweisgeberschutzgesetz*) and confirm the receipt of your report within seven days and inform you about the results to the extent legally prescribed (or the current status of the investigation, should it still be ongoing) within three months of the receipt of the confirmation, subject to data protection rules.

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13. What data protection rights do I have?

As a whistleblower, you have special rights as a data subject (Art. 15 ff. GDPR), including the right to access data processed about you, the right to correct incorrect or incomplete data and, under certain conditions, the right to limit the processing of your data or to delete data about you that has been processed.

You also have the right to contact the Data Protection Officer of ProSiebenSat.1 Media SE if you would like to receive further information about the data processing or to raise data processing concerns. The Data Protection Officer of ProSiebenSat.1 Media SE is:

Stephan Tawin
datenschutz@prosiebensat1.com

You have a right of appeal to the relevant Data Protection Authority if you have any doubts about the lawfulness of the data processing.

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