



**RULES OF PROCEDURE**  
**FOR THE COMPLAINTS MECHANISM**  
**PURSUANT TO THE**  
**GERMAN**  
**SUPPLY CHAIN DUE DILLIGENCE ACT**  
**(SCDDA)**  
**OF**  
**PROSIEBENSAT.1 MEDIA SE**  
**AND THE ENTIRE PROSIEBENSAT.1 GROUP**

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## 1 What is the Complaints Mechanism, its scope and its objective?

- The Complaints Mechanism enables any (!) person to confidentially report (suspicions of) risks or violations of human rights or environmental obligations in the supply chain of ProSiebenSat.1 Media SE and its subsidiaries as well as in its own business area (ProSiebenSat.1 Media SE and its subsidiaries are jointly the “ProSiebenSat.1 Group”) to the ProSiebenSat.1 Group. The Complaints Mechanism creates a protected channel for communicating observations, information and concerns in this regard.
- Every report made in good faith helps ProSiebenSat.1 Group to identify human rights and environmental risks in the supply chain at an early stage and to prevent them from occurring or to sustainably remedy violations that have already occurred. It is therefore important to report such observations. We therefore ask you for your assistance.
- The main elements of the Complaints Mechanism and your role as someone making a report or being a whistleblower are outlined below. If you have any further questions with regard to your reports and complaints, please use one of the reporting channels (section 4) or get in touch with one of the contact persons (section 6) listed below.

## 2 For what kind of complaints or reports may can the Complaints Mechanism be used?

- Information on risks for or violations of human rights or environmental obligations along the entire supply chain of ProSiebenSat.1 Group may be reported.
- Human rights in particular comprise the prohibition of child labour, forced labour and slavery, the provision of occupational safety and health, freedom of association, non-discrimination, minimum wage, prohibition of pollution and the obligation to preserve natural resources such as soil, water, air, emissions.<sup>1</sup>
- Environmental obligations arise in particular in connection with mercury, chemicals (especially persistent organic substances, so-called POPs) and hazardous waste.<sup>2</sup>
- The risks and violations covered are not only those within the companies/sites/production facilities/branches of the ProSiebenSat.1 Group, but also those within the companies/sites/production facilities/branches of all suppliers of the ProSiebenSat.1 Group as well as the suppliers of the suppliers.

*Note: Don't get hung up on the exact definition of the scope - we'll take care of that with our team of experts. Report your observations and perceptions in the*

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<sup>1</sup> For a detailed, more in-depth description, please refer to the provisions of the SCDDA, the explanatory memorandum and the handouts of the Federal Office of Economics and Export Control (BAFA).

<sup>2</sup> Ibid.

*human rights and environmental spectrum, even if you are not sure whether they fall within the scope of the law.*

### 3 Who may make complaints or reports?

- The rule is: Anyone may report. This means that anyone may report, regardless of whether they work for the ProSiebenSat.1 Group (as a permanent employee, temporary worker, intern, etc.) or only have an external connection (e.g. as an employee of a supplier).
- A whistleblower does not have to be affected by the risk or violation him/herself; third parties such as observers may also render a report. You may also exchange information with interest groups regarding the report or ask to be represented by them when reporting (for example, representation/reporting by trade unions, NGOs or other third parties).

### 4 Which reporting channels can be used to submit information?

Complaints/reports may be submitted as follows:

Via the electronic reporting system available at: <https://prosiebensat1.integrityline.com>

This reporting system is available around the clock and every day. All reports are screened by Group Compliance of ProSiebenSat.1 Media SE and forwarded to the right contact person.

### 5 How does the Complaints Mechanism work?

Overview of steps:



#### Step 1: Receipt of the complaint/report

You make your report via the reporting channel mentioned above (point 4.) and create a so-called secure mailbox in the reporting system. You will be assigned a case ID and a password. **IMPORTANT: Please make a note of these access credentials,** otherwise you will no longer be able to access the secure mailbox and cannot not retrieve our reply. You can use this mailbox to make your report and to communicate securely and, if you wish, anonymously throughout the entire procedure, e.g. about the status of the case. You can select your language and country when entering the information. Documents, pictures and sound clips can be uploaded as attachments. If you prefer, you may only send a speech message via the electronic reporting

channel. Receipt of your report will be confirmed and documented. Confidential processing of the information is guaranteed throughout the entire procedure.

**Step 2: Examination of the complaint / report**

Your complaint/report will be created as a case and then processed, i.e. it will be checked for plausibility and the further procedure and responsibilities will be determined. In particular, it is checked whether the facts need to be clarified further or whether they are already sufficiently substantiated, and which internal departments may need to be involved. In addition to Group Compliance, the departments Legal Affairs, HR Policies & Labour Law, Internal Audit and Group Sustainability Office may also be involved. Generally, you are likely to be contacted at such an early stage of the process for an exchange of further information the case. If desired, you may remain anonymous if you use the electronic reporting system.

**Step 3: Discussion of the facts**

The facts of the case will be discussed with you (you can remain anonymous if you wish). If the case is closed (i.e. the complaint is rejected), you will receive an explanation. IMPORTANT: Please make a note of your access credentials, which you will receive when using the electronic reporting system, so that you can also review our answers. If the complaint is not closed, a solution will be worked out in step 4.

**Step 4: Development of a solution**

A proposal for a solution will be worked out on the basis of the facts ascertained. This will be discussed with you if you yourself are affected as a whistleblower. If you are not affected, you will be informed of the proposed solution. If necessary, agreements on compensation will be made. We will comply with all relevant data protection regulations. This may also affect the amount of information we provide to you.

**Step 5: Remediation**

The agreed measures for remediation, i.e. measures to end the violation immediately (if possible), are implemented. The implementation shall be carried out either by a ProSiebenSat.1 Group company or an organization commissioned by ProSiebenSat.1 Group.

**Step 6: Review of the remediation and conclusion of the case**

The implementation of the remedy will be reviewed and evaluated. An interim report on the results will be prepared. If you were affected yourself, the result of the evaluation will be discussed with you. In all other cases you will receive a final report. If the risk or violation has been sufficiently eliminated, the interim report becomes the final report and the case is closed.

**Timing:**

The investigation and remediation teams work as efficiently as possible to verify and solve problems. Every investigation and every remediation is different and therefore the time required may vary. However, the ProSiebenSat.1 Group strives to deal with all cases quickly, i.e. within weeks rather than months. The following applies: The more serious the risks/violations in question are in terms of intensity and extent, the faster

remedial action must be taken; ideally, the violation will be stopped altogether. In any case, whistleblowers must be given feedback on their report within three (3) months at the latest from the date on which receipt of the report was confirmed. If the examination takes more than three (3) months, the whistleblower must be given feedback at regular intervals, at least every three (3) months. You will also receive this feedback via the electronic reporting system. Therefore, please make a note of your access credentials.

The effectiveness of the Complaints Mechanism is reviewed at least annually and on an ad hoc basis.

## **6 Who are the contact persons for the persons making reports?**

The overall responsibility for the Complaints Mechanism lies with Group Compliance. The information is initially received by Group Compliance via the electronic reporting system as a complaints channel. Group Compliance makes an initial assessment and decides whether the matter requires further clarification or potentially forwards the report to another internal department (see above). In addition to Group Compliance, Legal Affairs, HR Policies & Labour Law, Group Sustainability Office and Internal Audit may be considered as further internal contacts. The concrete assignment of each case is made on the basis of the content of the report.

## **7 Are the complaints/reports dealt with objectively, impartially and independently?**

- Cases are processed and reviewed objectively and impartially. Access to information is limited to those persons who absolutely need this information to process a case (need-to-know principle).
- The persons involved in case review and processing act independently. This means that they are impartial and independent how they handle a case and are not bound by instructions.

## **8 Is confidentiality maintained in the Complaints Mechanism?**

- The persons involved in are obliged to maintain confidentiality. Your identity as a whistleblower will be treated confidentially. This also applies if the suspicion ultimately proves to be unfounded. If you wish, you may also remain anonymous during the procedure.
- All reporting channels are confidential channels through which you can ask questions and/or report concerns about actual or potential risks and violations of human rights and environmental obligations or respective misconduct.

## 9 How are whistleblowers protected from retaliation?

- ProSiebenSat.1 Group does not tolerate any retaliatory measures (in particular discrimination, punishment, measures under labour law, etc.) against persons who report concerns/observations in good faith or are involved in a subsequent investigation. This applies even if the concerns are ultimately unfounded.
- Retaliation for such reports are strictly prohibited at all ProSiebenSat.1 Group companies and would be punished as serious misconduct, which is also a principle set forth in our Code of Conduct, which you can access on ProSiebenSat.1 Media SE's public website.

### Thank you for your assistance

ProSiebenSat.1 Group attaches great importance to human rights and the protection of the environment. Not only since the introduction of the LkSG. With your reports, you support us in the sustainable protection of these important goals. Thank you for your assistance!