Firma
FUNKE Mediengruppe GmbH & Co. KGaA

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Jakob-Funke-Platz 1, 45127 Essen

Abteilung
Compliance

Datum
Februar 2025

Rules of procedure for the complaints procedure/ whistleblower system

of the FUNKE Mediengruppe

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Ein Unternehmensbereich der FUNKE Mediengruppe

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1 Scope of application of the procedure. What kind of reports or complaints can the procedure be used for and who can submit a report or complaint?

The complaints procedure is integrated into the general whistleblower system, which can be used to report breaches of legal provisions (EU law/national law) and internal guidelines and codes. The system is therefore also applicable to all human rights and environmental breaches covered by Section 2 (2) and (3) of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz).

The opportunity to report information on grievances or misconduct is open to everyone - regardless of their relationship with the FUNKE Mediengruppe. Employees, business partners, customers and other third parties also have the opportunity to submit reports or complaints. Reports can also be submitted anonymously.

2 Which complaint channels can be used to enter information or complaints into the procedure?

Information or complaints can be submitted via the following reporting channels:

- Digital Whistleblower System
  https://whistleblowersoftware.com/secure/funke-mediengruppe
- E-Mail: compliancehinweise@funkemedien.de
- Postal: FUNKE Mediengruppe, Compliance, Jakob-Funke-Platz 1, 45127 Essen

It is furthermore possible to contact Dr. Stefanie Hüsken (telephone office: +49 201 72096-27) from the law firm bdp Rechtsanwälte in Essen (funkemedien@bdp-essen.de).

3 What is the complaints procedure?

The initial processing of reports is only carried out by a small number of persons from the Compliance department who are obliged to maintain special confidentiality. If the scope of application of the General Equal Treatment Act (AGG) is the subject of a report or if it concerns sexism, sexual harassment or bullying, the anti-discrimination officers of the FUNKE Mediengruppe, who are also obliged to maintain special confidentiality, are directly involved. An initial review of the report/complaint is carried out and, if there is sufficient initial suspicion, the investigation is coordinated, which is usually carried out together with the Internal Audit department and, if necessary, the Legal department and Human Resources. In addition, it is also possible that the responsible works council, data protection, the relevant department, external legal support and/or authorities may (have to) be involved in further investigations.

If the contact details of the reporter are left with the report, confirmation of receipt will be sent within 7 days. The whistleblowers are then in continuous contact with the person making the report. The whistleblower will receive information about the measures already taken and the status of the investigation at least within 3 months.

4 Who are the contact persons for whistleblowers and which department is responsible for the complaints procedure?

The Compliance department is responsible for the complaints procedure/whistleblower system. The contact persons in the Compliance department are the Chief Compliance Officer and a Compliance Officer. The contact persons for the Anti-Discrimination Office are the Anti-Discrimination Officers.

5 How does the FUNKE Mediengruppe ensure effective protection against discrimination or penalisation of a whistleblower and accused person on the basis of a whistleblower/complaint?

FUNKE Mediengruppe ensures that those who report an offence to the best of their knowledge and belief are not exposed to any negative consequences. Those who discriminate against whistleblowers or threaten reprisals must expect consequences under labour law, as the FUNKE Mediengruppe will not tolerate such behaviour under any circumstances.

Information and complaints are treated with the utmost confidentiality, i.e. in particular the names of the whistleblowers and accused persons or detailed information that allows conclusions to be drawn about the identity of the whistleblower or accused person are not disclosed to persons who are not involved in the investigation.

In the interests of full transparency towards the reporting parties, it should be noted that in the context of official investigations that may arise from a report, the full disclosure of all information from the investigation (including any identities) could be ordered by a court.

However, it is also possible to report anonymously. Particular care must be taken to ensure that no information is provided that would allow conclusions to be drawn about the identity of the person making the report.

6 How does the FUNKE Mediengruppe ensure the effective protection of an accused person based on a tip-off/complaint?

If natural persons are accused of misconduct, the presumption of innocence applies initially. The initial whistleblowers (Chief Compliance Officer and/or a Compliance Officer or the Anti-Discrimination Officers) carefully examine the report. If the initial suspicion is confirmed, further investigations will be carried out as described under 3.

It should be noted that the whistleblower is obliged to provide truthful information to the best of his/her knowledge and belief when making a report.