

# CODE OF CONDUCT

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# Message from the Group's Management Board

## Dear Employees,

One of the important shared values for DuMont is 'relevance'. Together, we have the challenge of offering our customers, users and readers relevant content, data, technology and services at all times. Thus, our self-concept is defined as follows: What is my contribution so that DuMont is relevant today? This motivates all of us to give our best every day.

For more than 400 years, DuMont has repeatedly reinvented itself, but precisely as a family-owned company, a constant has always been the dedication to the management of its business dealings with integrity – and this across generations. That is why sustainability and trust in particular are of critical importance to us. We know: Trust that has been built over a long time can also very quickly be lost. And it is difficult to win back. In particular situations, it helps to reflect on our values and principles which provide us with orientation when difficult decisions need to be made.

Our **Code of Conduct** gives us important information and tips and is supposed to help us to make the right decisions in the daily business as well with regards to our business partners.



We are convinced that the uniting of entrepreneurial action and ethical principles has contributed greatly to our success. We consider it to be critically important to protect and preserve this reputation. Through consistent action within the parameters of our company culture that we have embraced, each individual contributes to this goal at all DuMont companies and our business partners as well.

Thus, it is important that we all embrace the Code of Conduct within the Group. It is a central component of our overarching goal: To collectively do the right thing in order to safeguard the future – for us and the coming generations.

**Dr. Christoph Bauer**  
CEO of DuMont

**Stefan Hütwohl**  
CFO of DuMont

# 1 Our Values

Our Code of Conduct is based upon our corporate values. They are namely: **Relevance, openness, responsibility, entrepreneurship and sustainability.**

These values lay the foundation for our cooperation at DuMont. We are determined to live a corporate culture in which we treat each other fairly and respectfully, act with integrity and transparency, communicate honestly and accept responsibility for our actions. In this context, as a media and technology company, we are aware of our special role: We constitute a cosmopolitan and democratic company and are also promoting it. We work in a results-oriented manner while being aware of our social responsibility and regard this as being a comprehensive challenge – particularly with regards to the generations that follow. Precisely as a family-owned company, our actions are understood to be an integrated approach in order to safeguard economic, ecological and social contributions.

In this context, we wish to conduct our business activities in an environmentally- and socially compatible manner in accordance with the **internationally prescribed sustainability standards (ESG)**. In addition to that, we are a group of companies which is characterized by its overarching interlinkage of innovativeness and know-how transfer.

**Relevance**

**Openness**

**Responsibility**

**Entrepreneurship**

**Sustainability**



# 2 Our Code

Our Code of Conduct reflects these core values for which DuMont stands and to which we orient ourselves whenever we act in the market. It does not only fix in writing the statutory provisions and our own standards for sustainable business practices. It also provides a framework for workplace conduct for all employees up to the highest management level.

Via the **attitude** that is fixed in writing in our Code of Conduct, we wish to not only document our standards internally, but rather also externally to our stakeholders. Moreover, as a Code of Conduct, it ensures transparency and, in this regard, helps to protect the company from practices which could end in criminal law proceedings, high monetary fines or damage to our image.

However, it is not merely enough to formulate the Code of Conduct as **instructions**. It must be accompanied and supported by role models. First and foremost, the management team at DuMont have a **role model function** in which they must credibly conduct themselves in a legally flawless manner and with integrity. However, at the same time and beyond this, they must also ensure that the employees have familiarized themselves with the Code of Conduct and the conduct standards described therein and that the employees also act in compliance with them.

The following is also important to us: The content and values of the Code of Conduct do not end merely at internal boundaries. In the case of direct service and delivery companies whereby, owing to the type of their business activities, the geographical location where they exercise those business activities or through other factors, higher-level human rights or environmental risks could exist which affect them, through the acceptance of our suppliers' Codes of Conduct, we also ensure the fulfilment of the provisions of this Code of Conduct.



# 3 Our Focus on Sustainability

**Our Code of Conduct focuses on three action fields of our sustainability program – namely “E” for Environmental (environment), “S” for Social (employees and social activities) and “G” for Governance (company management).**





## Our Focus on **Sustainability**

**Owing to the significance of the legal framework for our actions, we wish to initially address the “G” for Governance.**

# Governance

## How We Wish to Manage Our Company

The **fulfilment of all valid laws and guidelines** on the local, national and international level is a given for us at DuMont and our business partners.

Particularly employees with budgetary or personnel responsibilities are obligated to familiarize themselves with the fundamental laws, guidelines and the company's internal rules which are relevant for their respective spheres of responsibility.

Each violation of valid laws or guidelines may trigger grave consequences for both DuMont as well as also our employees, e.g., criminal law prosecution, labor law measures or damage compensation.

Thus, we will address indications of potential violations as well as remedy and punish them after we have correspondingly confirmed that these violations have actually occurred.

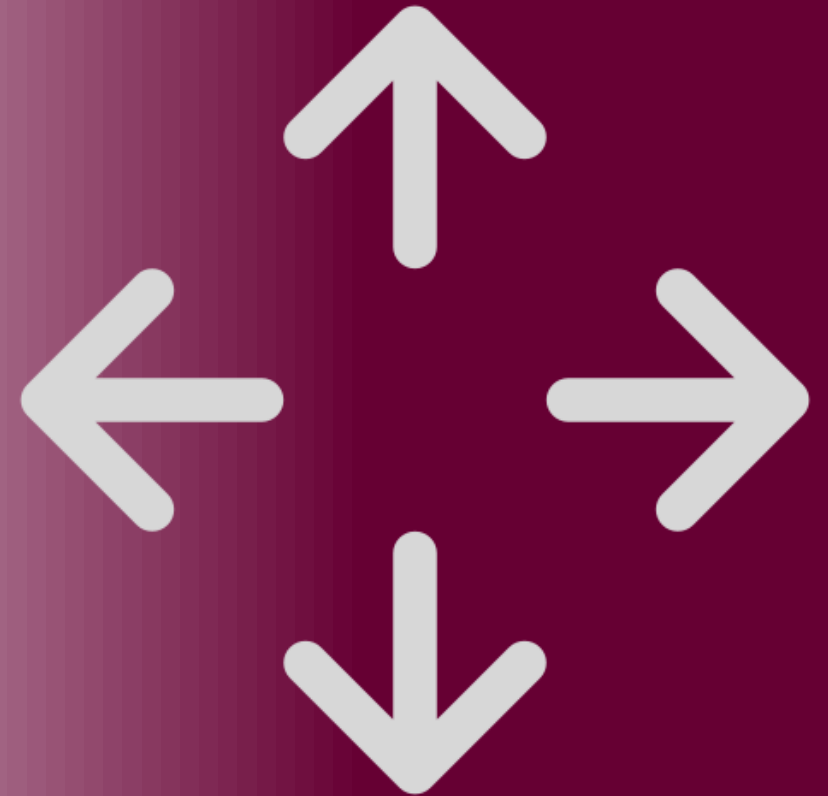


# Governance

## How We Wish to Manage Our Company

At DuMont, we acknowledge the Principle of **Fair Competition**. We are obliged to fulfil the applicable antitrust and competition law. In almost all countries, specific relationships and agreements with other market participants (among others, competitors, supply companies, distribution companies or trading companies) that restrict fair competition are banned by law. In this context, for example, this may include price agreements, the allocation of customer or sales territories between competitors, anti-competitive boycotts as well as other unfair competition methods.

Through appropriate measures, we ensure that **transactions with third parties** do not result in violations of valid economic embargos, sanction lists or guidelines issued by trading, import and export controlling authorities. If, in this regard or during the subsequent collaboration, it becomes evident that business partners are acting inappropriately or illegally, legal support shall be promptly obtained.





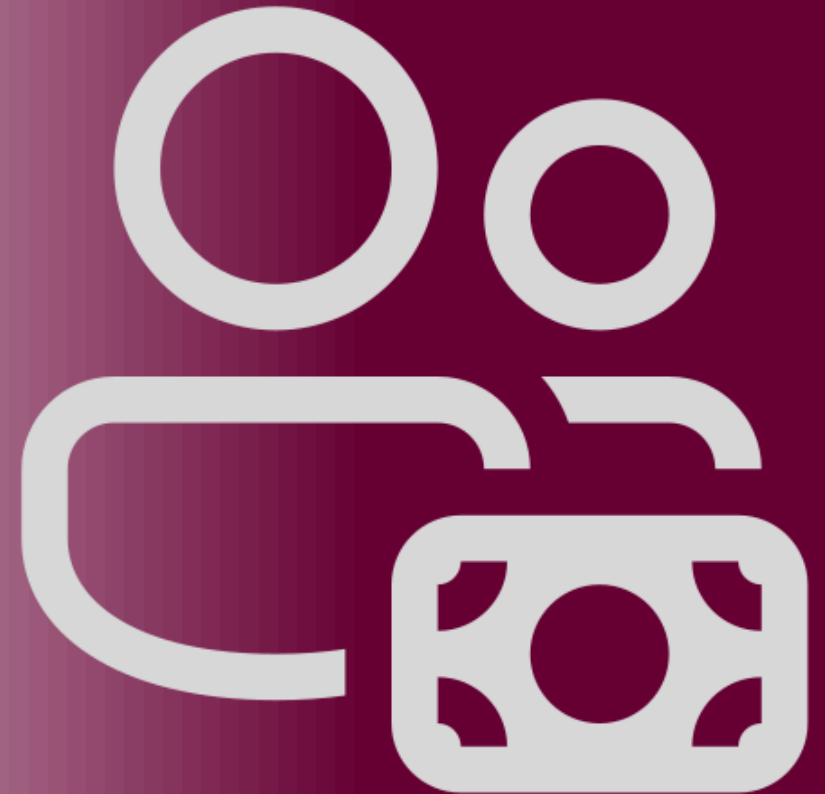
# Governance

## How We Wish to Manage Our Company

At DuMont, we tolerate no form of **bribery and corruption** – whether it involves public officials or in dealings with business partners. In this regard, we provide no material gifts and limit invitations to appropriate hospitality.

In addition, business partners and their employees must conduct themselves in such a manner that no personal dependencies, obligations or influences are created. It is expected that everyone engages in business conduct that is based upon fairness and the fulfilment of the applicable national and international norms. We also support our business partners also introducing anti-bribery and anti-corruption guidelines to be followed in all their divisions.

**Allocations** provided in the form of invitations or gifts are permissible within certain parameters if they serve the purpose of promoting business relationships or presenting products or services. Such allocations may be accepted or granted only if they do not represent a reward provided in order to obtain an illegal advance. Both donations as well as sponsoring activities are fundamentally permissible, but they may nonetheless not be used in order to obtain illegal business advantages. We forbid any type of concealment of gifts which could substantiate corruption risks.



# Governance

## How We Wish to Manage Our Company

During the collection, storage, processing or transfer of **personal data**, we fulfil the provisions of the valid General Data Protection Regulation.

At DuMont, we responsibly handle **company property** and other company assets.

We make our **purchasing decisions fairly and with integrity** based upon objective criteria such as quality, price, service, reliability, availability, technical performance, contractual fulfilment, resource and energy efficiency as well as environmental compatibility.

In order to ensure proper **documentation** and storage of documents, precision and completeness as well as a sense of responsibility are indispensable during all operational processes of the company.



# Social

## How We Wish to Interact with Each Other

At DuMont, we are stronger together. The decisions that we make are intended to show consideration for each other and to treat each person fairly and respectfully.

We are convinced of the following: The strength of our culture will be the decisive factor for the successful safeguarding of the company's future.

**Stronger Together!**



# Social

## How We Wish to Interact with Each Other

At DuMont, each **person** has the right to be treated with fairness, dignity and respect.

We are committed to diversity as well as equal opportunity and support a **work environment** which is characterized by respect and tolerance. Everyone is valued. Sexual harassment, discrimination, racism, bullying, abuses of power, intimidation or threats and other forms of harassment are not tolerated.

We respect **human rights, personal rights** and the **dignity of our employees and all third parties**. Compulsory labor, child labor, all forms of modern slavery and the human trade as well as any form of exploitation are strictly rejected by DuMont, and we ensure the strict fulfilment of the corresponding laws.





# Social

## How We Wish to Interact with Each Other

In principle, we ensure that no persons are hired who are younger than the **minimum age** that is legally prescribed in the respective country. DuMont's business partners are obliged to undertake the measures required which prevent the hiring of persons under the statutory minimum age. The minimum age for permissible employment may not be below the age in which the obligation to attend school ends and may in no case be below 15 years of age. The national standards for the protection of child and youth workers must be followed. The exceptions to the ILO core labor standards shall be valid. Children must be protected from economic exploitation, the implementation of work, which is dangerous, which compromises the child's education as well as which could harm the health or physical, mental, emotional, moral or social development of the child.

We reject any form of compulsory **prison work**. This includes non-voluntary work which is performed in order to re-socialize and employ prisoners in prisons.

No employee may, directly or indirectly, be compelled to work through force and/or intimidation. Employees may only be employed if they have **voluntarily** made themselves available for work.



# Social

## How We Wish to Interact with Each Other

We tolerate no **discriminatory conduct** whatsoever based upon reasons of ethnic origin, nationality, gender, sexual orientation and identity, pregnancy or parenthood, family status, age, religion, ideology or owing to handicaps or other reasons falling under a discrimination ban.

All employees must be treated with **dignity and respect**. No employee may be exposed to verbal, psychological, physical, sexual and/or physical violence, coercion or harassment.

We also demand from our business partners that the wage paid to the employees correspond to at least the **minimum wage** prescribed by law or which is customary for the industry. Insofar as there should be neither minimum wages prescribed by law nor which are customary for the industry, the direct business partners are supposed to ensure that the wage paid essentially suffices in order to cover the employees' basic requirements subject to the consideration of the circumstances that also occur individually (such as pure secondary employment, part-time employment and the like).



# Social

## How We Wish to Interact with Each Other

For us at DuMont, honest interaction with each other is of great importance: We want and promote the candid **exchange of opinions**. We want to also reciprocally motivate each other, provide feedback and also accept it even if it sometimes entails sensitive messages. We can do this without having to fear negative consequences. Feedback is a gift. It enables us to change and improve things at our end. Such a feedback culture is important and helps DuMont to permanently improve its products and business practices.

We likewise discuss our own **mistakes** openly. We share with one another what we have learned from our mistakes. By so doing, we prevent the same mistakes from occurring again. In this manner, we contribute to our organization and our group of companies becoming more resilient.

With regards to **feedback and the error culture**, our management team plays a critical role. It encourages all employees within its functional area to openly state their opinion, to participate in the decision-making and to listen to concerns.



# Social

## How We Wish to Interact with Each Other

Thus, we encourage **free and critical thinking** and place value on an open work atmosphere in which employees may contact their supervisor or the management team – even with critical feedback – without any reservations. We shall tolerate no attempts at intimidation and reprisals against employees who, in good faith and to the best of their knowledge, report misconduct that has actually occurred or is suspected to have occurred.

We are convinced that any concerns regarding conduct in the workplace can frequently be resolved on-site in a **constructive discussion** amongst the affected parties or with contact persons. It is important to us that all employees find an open ear whenever there is a need to address a problem.

Whoever has a concern can discuss it first with the corresponding manager or with the contact person in the HR Department on-site or with the company's designated representative. Very likely, they can assess the situation and help to **find solutions**, or they can say to whom the employee could otherwise speak.





# Social

## How We Wish to Interact with Each Other

We adhere to the rules and regulations for the **ensuring of fair working conditions**, including those regarding wages, working times and the protection of one's privacy. Our compensation systems guarantee a **market-, function- and performance-based wages** subject to the consideration of business-specific factors.

We adhere to the laws and rules for occupational safety and for health in the workplace and ensure a healthy and risk-free work environment for our employees. At DuMont, ensuring **safety and health in the workplace** is a permanent component of our company culture.



# Special Challenges

## in Everyday Work Life and in Communication

In everyday work life, each of us can be confronted by business decision-making situations in which the company's interests are in conflict with our personal interests. **Conflicts of interest** may lead to decisions no longer being made impartially in the company's best interests.

Therefore, from our perspective, it is important that employees, who are affected by a potential or actual conflict of interest, promptly notify their supervisors or the management team. Thus, a **clarification** can be provided quickly.

If, in the individual case, an uncertainty should exist whether a decision is in harmony with the standards of the Code of Conduct, it helps to ask oneself whether the decision could also be represented without any problems to third parties – thus whether it could also be reconciled well with one's own conscience and whether the decision lies in the company's best interest.



# Special Challenges in Everyday Work Life and in Communication

**Confidential information** and its handling are part of the everyday work life at DuMont for many employees. In this context, one considers such confidential information to be non-public information which is intended only for a restricted circle of persons and not for internal dissemination or external publication. This includes, among others, documents, reports, contractual agreements, financial data, personnel information, investigations, legal disputes, creative work products, intellectual property and business or product plans.

The discussion of confidential information in public or the **unauthorized dissemination of information** regarding the company or its customers to third parties constitutes a violation of confidentiality obligations unless legal exceptions apply (for example, within the parameters of whistle-blower systems).

Particularly employees, who have access to this information, which is particularly worthy of protection, shall be obliged to a **strict confidentiality** obligation.





# Special Challenges

## in Everyday Work Life and in Communication

DuMont considers itself to be obliged to **protect whistle-blowers**. Employees, who in good faith report illegal or improper actions in accordance with the Whistle-Blower Protection Act of which they have become aware, shall fear no disadvantages in accordance with the valid rules of the Whistle-Blower Protection Act – even if the suspicion later is revealed to be unfounded.

We will promptly respond to such notifications in an appropriate manner by designated trained personnel during an orderly process and, if required, conduct a formal investigation.

If it should turn out that misconduct has occurred, DuMont will undertake appropriate measures against the responsible persons.





# Special Challenges

## in Everyday Work Life and in Communication

We are proud to inform the public on an ongoing basis regarding DuMont's work. In this regard, we ensure that we follow some **fundamental rules**.

Whenever we are contacted by journalists or the media and are not authorized to make statements, the inquiry must be forwarded to the responsible Communication Department or the responsible office.

Whenever we make comments about DuMont in **social media** such as Facebook, Twitter, LinkedIn, Instagram, on online message boards or in other online forums, we should under no circumstances share confidential information not known to the public or content which serves exclusively internal purposes.

In our **private social media accounts** where we express our personal opinion, we should ensure that the audience is not left with the impression that we are speaking for DuMont.



# Environment

## How We Wish to Protect the Environment

At DuMont, it is important to us to work in such a manner that **sustainable resources** for living are available to subsequent generations. Thus, the protection of the environment and the climate forms an essential component of our entrepreneurial responsibility.

We are a family-owned company and our actions are considered to be an integrated approach in order to ensure economic, ecological and social performance. We want to conduct our business dealings in an environmentally- and socially compatible manner in accordance with internationally prescribed sustainability standards. We responsibly handle our resources such as energy and water.

DuMont is making a targeted effort to convert its fossil-fuel vehicle fleet to climate-friendly models and to promote the climate-friendly mobility of our employees.



# Environment

## How We Wish to Protect the Environment

We follow all valid **environmental regulations** as well as internal environmental guidelines. We are endeavoring to increase the resource and energy efficiency during the production and distribution of our products and services, to minimize the negative ramifications on the environment and, by 2030, to reduce our current CO2 emissions by 40% and, by 2040, to reduce them by 90%. In parallel to that, we will annually compensate for our remaining **CO2 footprint** via climate protection projects which fulfil the highest standards.

At DuMont, it is our mission to offer our customers **safe and top-class products** of impeccable quality. Products may show neither defects nor hazardous features which could compromise a person's health or damage property.



# Environment

## How We Wish to Protect the Environment

With regards to our business partners who, owing to the type of their business activities, the geographical location where they exercise their business activities or owing to other factors, could have higher environmental risks, we ensure the fulfilment of the provisions of this Code of Conduct through the **acceptance of the Suppliers' Codes of Conduct**.

We adhere to them in order to continuously work to **prevent and reduce the environmental impact**. Valid processes and standards for waste management, the handling of chemicals and other hazardous substances as well as their disposal as well as also for emissions and for the wastewater treatment must be fulfilled.

The **protection and preservation of natural resources** must be given special consideration. Insofar as we become aware of situations involving special environmental risks affecting our business partners, we shall ensure that DuMont itself, or its authorized third party may, as required, verify the fulfilment of the principles prescribed in this Code of Conduct.





# 4

## How We Live the Code

**We all want to do the right thing!**

This Code of Conduct helps to provide orientation. If something isn't working correctly, then it is important to discuss this. The key is to take responsibility! We would be glad to provide support and assist you at any time in this regard.

In addition, we will, together with the management of the individual divisions, to ensure that our group of companies will offer EU-compliant internal and external reporting offices for whistleblowers by the end of 2022. They are part of an institutionalized whistleblower system for reporting violations.

**You may also use the e-mail**  
**[compliance@dumont.de](mailto:compliance@dumont.de)**  
**To get in touch.**

