

Rules of procedure of the Supply Chain Compliance Act of the DuMont Media Group

General information

These rules of procedure implement the obligation of DuMont Mediengruppe GmbH & Co. KG (hereinafter referred to as "DuMont" or the "Company") to introduce a complaints procedure within the meaning of Section 8 of the German Supply Chain Due Diligence Act (Supply Chain Compliance Act). The complaints procedure enables individuals to draw attention to human rights and environmental risks as well as violations of human rights or environmental obligations that have arisen as a result of the economic activities of the DuMont Media Group in its own business area or of a direct supplier.

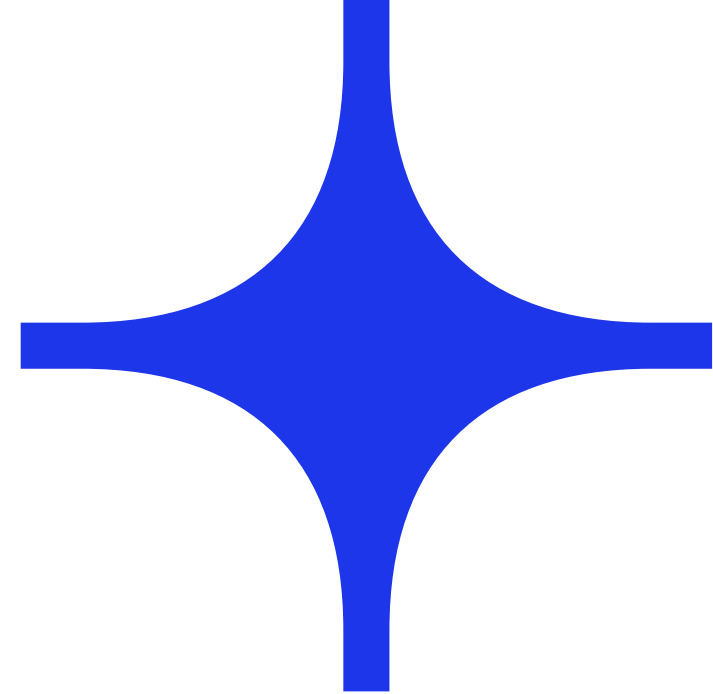
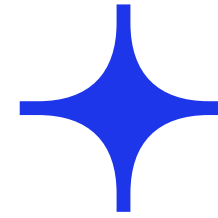
The company's "own business area" also includes the business area of companies affiliated with the company within the meaning of Sections 15 et seq. AktG, so that these rules of procedure also apply to information on human rights and environmental risks and the violation of human rights-related or environmental obligations of affiliated companies.

DuMont has appointed a Compliance Ombudsman as a complaints office to whom employees, business partners and third parties can turn as an external, independent and impartial contact person if they have indications that violations of the human rights-related or environmental obligations within the meaning of Section 2 (2) and (3) of the German Supply Chain Duties Act (Supply Chain Compliance Act) of DuMont or companies affiliated with the company have occurred. This serves to counteract violations of applicable law at an early stage and to avert damage to our employees, business partners, third parties and also to DuMont.

The Compliance Ombudsman is not an arbitration centre for disputes. The client relationship exists only between the company and the Compliance Ombudsman. Nevertheless, the Compliance Ombudsman acts impartially and is not bound by instructions from DuMont. As a lawyer, the Compliance Ombudsman is obliged by law to maintain confidentiality.

Definitions

- 1) Violations are acts or omissions in the context of a professional, entrepreneurial or official activity that violate human rights-related or environmental obligations within the meaning of Section 2 (2) and (3) of the German Supply Chain Due Diligence Act (Supply Chain Compliance Act).
- 2) Information about violations are reasonable suspicions or knowledge of actual or potential violations that have already been committed or are very likely to occur, as well as attempts to conceal such violations.
- 3) Notices are reports of information about offences to the reporting offices specified in these Rules of Procedure.
- 4) Reprisals are actions or omissions in connection with professional activity that are a reaction to a report or disclosure and that cause or may cause unjustified disadvantage to the whistleblower.
- 5) Data subjects are persons who are the subject of a report.



Persons providing information

- 1) Whistleblowers may be employees, former employees, customers, suppliers or other third parties.
- 2) Any whistleblower acting in good faith is authorised to provide information. Whistleblowers acting in good faith are covered by the scope of protection of these Rules of Procedure.
- 3) A whistleblower is deemed to have acted in good faith if, at the time of reporting, he or she assumes that the information he or she has reported on violations is true.

Prohibition of reprisals

Reprisals against whistleblowers are prohibited and retaliation based on whistleblowing will not be tolerated. This also applies to threats and attempts of retaliation. Whistleblowers are encouraged to report it if they are subjected to discrimination or retaliation by DuMont employees or DuMont suppliers because they have provided a tip in good faith. DuMont will respond to these employees or suppliers in an appropriate manner (e.g. warning, organising a workshop, demanding compensation).

As part of the reporting procedure and also at the end of the reporting procedure, the Compliance Ombudsman will enquire with the whistleblowers if they have been subjected to reprisals by DuMont employees or DuMont suppliers as a result of the whistleblowing.

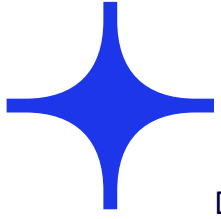
Even after the procedure has been completed, whistleblowers can report it to the Compliance Ombudsman if they are subjected to reprisals by DuMont employees or DuMont suppliers as a result of the whistleblowing.

Reporting office

- 1) This Directive does not oblige anyone to submit a tip or report information about violations.
- 2) DuMont employees should be encouraged to report information about violations to their supervisor(s) first.
- 3) Whistleblowers can report information about violations to the DuMont Compliance Ombudsman.

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in its capacity as the "Supply Chain Compliance Act complaints centre".



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Dr Dilling is also available for personal meetings with whistleblowers. With the consent of the person providing the information, the meeting can also take place by means of video and audio transmission.

If you wish to communicate in encrypted form, you can also use the messenger services Signal and Threema to contact the Compliance Ombudsman. It is also possible to send encrypted emails to the Compliance Ombudsman via Protonmail to the following address:

`RADilling@protonmail.com`

Whistleblowers can report violations in a language of their choice via the whistleblower portal www.safewhistle.info, the messenger services stored there, by email and by post.

Whistleblowers may also request that the Compliance Ombudsman be accompanied at a personal meeting with the Compliance Ombudsman by an interpreter who is under a special obligation of confidentiality and who can translate from and into the national language of the whistleblower.

At the special request of a whistleblower, DuMont will appoint a compliance ombudswoman as a contact person in individual cases.

If whistleblowers contact the DuMont Media Group's Human Rights Officer, he or she will immediately forward the report to the Complaints Office for further processing.

Issue of the notes

- 1) The persons providing the information should be encouraged to do so,
 - to state what happened, when, where and with which parties involved and which other persons may have knowledge of this and whether there are any documents relating to it;
 - to be available for queries and to provide information on how they can be contacted;
 - only issue a report if the person making the report is in good faith that the infringement reported by them is actually true and
 - clearly express possible doubts by using appropriate formulations such as "*I believe*" or "*possibly*".
- 2) Anonymous reports are also accepted and processed. Whistleblowers may also request that the identity of the whistleblower known to the Compliance Ombudsman not be disclosed to DuMont.

Processing the notes

- 1) Upon receipt of a whistleblowing alert, the Compliance Ombudsman will provide feedback to the whistleblower within 24 hours that the whistleblower has received the alert. The Compliance Ombudsman clarifies the facts of the case with the whistleblower, what expectations the whistleblower has with regard to possible preventive or remedial measures and examines whether the whistleblower falls within the scope of the complaints procedure, in particular whether there could be a human rights or environmental breach of duty within the meaning of Section 2 (2) and (3) of the German Supply Chain Due Diligence Act (Supply Chain Compliance Act).
- 2) If, in the opinion of the Compliance Ombudsman, there is no relevant violation, he will explain this to the whistleblower. If, on the other hand, a relevant violation appears possible, the Compliance Ombudsman prepares the report and passes it on confidentially to the person responsible for human rights at DuMont. The person responsible for human rights at DuMont may decide with the company management how to deal with the report. If there are sufficiently concrete suspicions of legal violations, these are investigated internally in order to clarify and remedy any possible misconduct. As a rule, this is also done confidentially and discreetly in order to protect the interests of the whistleblower and the persons affected by the information.
- 3) The whistleblower will receive feedback from the Compliance Ombudsman no later than three months after the report has been issued as to whether the reported violation has been identified. If this is the case, the violation will be remedied. The expectations of the whistleblower are taken into account. The whistleblower is encouraged to report it if, in their opinion, the remedial measures taken are not sufficient.
- 4) If there are any questions about the facts of the case, the Compliance Ombudsperson or the DuMont Human Rights Officer will attempt to contact the person who made the report.
- 5) No later than three months after receipt of the report, the person making the report will receive feedback as to whether DuMont has taken action with regard to the report and, if so, what action it has taken.



Implementation of the confidentiality requirement, data protection

- 1) DuMont is aware that information may have sensitive content and that if this information becomes known, the persons providing the information, the persons affected by the information, third parties named in the report, but also DuMont and its employees may suffer considerable, even existential damage. In view of this, DuMont handles the information with particular responsibility and confidentiality.
- 2) DuMont ensures that
 - the confidentiality of the identity of the following persons must be maintained:
 - the persons providing the information, insofar as they are acting in good faith
 - the persons concerned and
 - the other persons named in the notification.

The requirement of confidentiality of identity applies regardless of whether the reporting office is responsible for the incoming report.

 - only those persons who process the information receive knowledge of the information, the identity of the person providing the information and the persons concerned. It must be specified in writing which persons these are.
 - these persons are obliged to maintain special confidentiality and are instructed to handle the information with particular confidentiality, in compliance with data protection and also in compliance with the law.
 - unauthorised employees cannot access the notices and the associated data.
 - the confidentiality of the identity of the whistleblowers, the persons concerned and the other persons named in the report is particularly protected in all follow-up measures taken with regard to the information.
- 3) All information, including all references to the persons providing the information, to the persons affected by the information and to other persons named in the report, will be treated with particular confidentiality, processed in accordance with data protection regulations and documented in a permanently retrievable manner in accordance with the law. Documentation held by the company will be deleted three years after the conclusion of proceedings. The documentation may be stored for longer in order to fulfil legal requirements as long as this is necessary and proportionate.