

Report on the LkSG (Supply Chain Due Diligence Act)

Reporting period from 01.01.2024 to 31.12.2024

Name of the organization: DuMont Mediengruppe GmbH & Co. KG

Address: Amsterdamer Str. 192, 50735 Cologne

Table of contents

A. Abbreviated reporting obligation in accordance with § 10 Para. 3 LkSG	1
A1. Monitoring of risk management & responsibility of the management	1
A2. Identified risks and/or identified violations	2

A. Abbreviated reporting obligation in accordance with Section 10 (3) LkSG

A1. Monitoring of risk management & responsibility of management

What responsibilities were defined for monitoring risk management in the reporting period?

Christian Musiol

Head of Legal Affairs Kölner Stadt-Anzeiger Media

Representative for human rights and environmental risks DuMont

Mediengruppe GmbH & Co. KG

A. Abbreviated reporting obligation pursuant to Section 10 (3) LkSG

A2. Identified risks and/or identified violations

No human rights or environmental risks were identified during the reporting period.

Provide a clear description of the period in which the regular risk analysis was carried out.

The report covers the full calendar year 2024. The suppliers were assessed on the basis of the methodology developed in 2023 and - as in the previous reporting year - consolidated. An overall assessment of the risks was carried out at the end of the year.

A. Abbreviated reporting obligation in accordance with Section 10 (3) LkSG

A2. Identified risks and/or identified violations

No human rights or environmental risks were identified during the reporting period.

Describe in a comprehensible manner the main steps and methods of the risk analysis, for example a) the internal and external sources used as part of the abstract risk assessment, b) the methodology of identification, evaluation and prioritization as part of the concrete risk assessment, c) whether and to what extent information on risks and actual breaches of duty obtained by processing information from the company's complaints procedure was taken into account in the risk analysis and d) how the interests of the potentially affected persons are adequately taken into account in the risk analysis.

The risk analysis is carried out in several steps, taking into account the company's causal contribution to the human rights or environmental risk or to the violation of a human rights or environmental obligation.

First, the abstract country risk is assessed using the classification according to the World Governance Index - amfori - with regard to co-determination and responsibility, political stability and absence of violence, government effectiveness, regulatory quality, rule of law and control of corruption in the country in which the supplier is based or from which the contractual services are provided. The abstract industry risk is then assessed with regard to human rights and environmental risks for the specific products/services concerned. This is done primarily by taking into account the implementation aids for determining human rights and environmental risks listed in the BAFA's "Guidance on the implementation of a risk analysis in accordance with the requirements of the Supply Chain Due Diligence Act" and on the basis of the findings that could be obtained from generally accessible sources, including media monitoring and supplier websites. In some cases, there was also an exchange with other companies obligated under the LkSG, the BDZV as the industry association and auditors.

The industry risk is assessed in the gradation "low/medium/high". In the event that several affiliated companies of DuMont Mediengruppe GmbH & Co. KG purchase products/services from the same industry and assess the abstract industry risk differently, the most stringent assessment of the risk is decisive for all affiliated companies. If, according to this assessment, there is at least a medium abstract country and/or industry risk, the supplier is requested to explain, with reference to the specifically described risk, how his company ensures that the agreements listed in the Annex to the LkSG are complied with. The information provided to the supplier

The letters sent out differentiate between the individual risks in order to be able to counter specifically addressed risks. In addition, the supplier is asked to complete a "supplier self-disclosure" form developed by DuMont. This gives the supplier the opportunity to provide information relevant to the risk assessment, in particular to submit a code of conduct, sustainability reports, certifications, etc. that applies to the supplier. They are also asked to explain whether and which standards they demand from their suppliers. If the supplier does not have a Code of Conduct, it will be asked to accept the DuMont Code of Conduct.

Depending on the supplier's reaction, it will be examined whether there are any indications of a specific risk that require further measures to reduce the risk, in particular whether the contractual clause developed by DuMont to guarantee supply chains that comply with human rights and environmental law will be included in the existing contract with the supplier. This clause is to be used as standard in new contracts to be concluded.

The specific risk assessment is carried out by the holding company that maintains the supply relationship in question. In accordance with BAFA's recommendation, a risk-based approach is taken here.

To date, no breaches of duty by suppliers have come to light as part of the risk analysis. No complaints were received during the reporting period. Should any breaches of duty become known in the future, these will be taken into account as part of the ongoing risk analysis, as a breach of duty could lead to a different assessment of the abstract country or industry risk than before.

The interests of the potentially affected suppliers are taken into account in that the contractual clause provides for a graduated concept of options for responding to breaches. In particular, it is envisaged that the contractual partner will coordinate suitable measures with DuMont within a reasonable period of time in order to remedy or minimize the violation. Extraordinary termination is only intended as a last resort. The interests of the potentially affected complainants are taken into account in that justified complaints are included in the abstract and concrete risk analysis and are addressed to the supplier as far as possible in order to work towards a remedy.

A. Abbreviated reporting obligation in accordance with Section 10 (3) LkSG

A2. Identified risks and/or identified violations

No violations of human rights or environmental obligations were identified during the reporting period.

Describe in a comprehensible manner which procedures can be used to determine violations in your own business area.

DuMont no longer manufactures any physical products itself. There are therefore no identifiable environmental risks in relation to the company's own production of goods. In addition, individual affiliated companies have an environmental officer and - where necessary - a waste officer. We would also like to point out that DuMont operates in accordance with internationally defined sustainability standards. The latest Dumont sustainability report is available at www.dumont.de.

Human rights-related risks are reduced as far as possible by appropriate organizational measures taken by DuMont Mediengruppe GmbH & Co. KG and its subsidiaries.

In detail:

The employment contracts in the DuMont companies have long been drawn up according to standard templates, which are regularly reviewed and updated by external law firms. The employment contracts in the individual affiliated companies are concluded according to uniform standards, but on an individual contractual basis, taking into account the freedom to conclude contracts. The minimum wage check is carried out via the structure of the employment contracts. The wage level is well above the current minimum wage.

If employment contracts are concluded in accordance with foreign law, these are drawn up and revised by the relevant HR or legal department in cooperation with local employment lawyers.

Equal pay is ensured by the remuneration system underlying the employment contracts, which is not based on gender but on education, skills, length of service and experience. In addition, employees from various departments responsible for HR issues have been trained in potential gender biases and other biases, and gender accounting has been introduced, which is carried out annually and set ambitious targets.

In some portfolio companies, the vast majority of employees work in production, where there is a uniform wage level and everyone earns the same. Against this backdrop, the risk of unequal treatment is already largely eliminated.

excluded. Insofar as existing employment relationships are subject to collective bargaining agreements, e.g. MTV & GTV for employees in the publishing houses of daily newspapers in NRW, these will be observed.

Many subsidiaries have works councils, and freedom of association exists without restriction.

DuMont Mediengruppe GmbH & Co. KG has published a Code of Conduct that summarizes the principles and values that guide the group of companies. It defines how we want to treat each other, what ethical standards apply and what behavior we expect from each other. The Code of Conduct reflects the core values that DuMont stands for and which guide our actions. The Code is published on the company's website and linked on the intranet. It is also displayed on the premises at the Cologne site and can be viewed at any time. In April 2023, this Code was expanded to include the Declaration of Human Rights. The affiliated companies have adopted this Code of Conduct either verbatim or in spirit.

In addition, a whistleblower system has been introduced, which can be used to report potential violations of our Code of Conduct, other company guidelines or legal regulations. Reported violations are either forwarded to an external ombudsperson or via a software tool to the responsible office in the company concerned and are thus followed up. In our open corporate culture, we encourage each individual to report violations of the Code of Conduct, other company guidelines or perceived injustices to the company management, the works council - if available - and/or the employees of the respective HR department or - if available - the departments responsible for compliance. This is regularly communicated to employees via the intranet as an alternative option to reporting via the whistleblower system.

As a matter of principle, DuMont companies comply with all legal requirements so that illegal child labor and forced labor do not take place. With regard to the minimum age for admission to employment, we follow the requirements of the Youth Employment Protection Act. Excessive physical and mental fatigue is prevented by complying with legal requirements regarding working hours and rest breaks. This is ensured in part with the help of IT systems; working time cards are kept at DuMont Buchverlag.

In the past, the employees of various affiliated companies were given initial training in occupational health and safety by an occupational safety specialist. Occupational safety support for the companies is provided by external service providers who assist with compliance with statutory regulations in this area. A company doctor is available in some cases. Operational functions, e.g. first aiders, fire protection assistants and safety officers, are appointed, and regular training sessions are organized.

Refresher training courses are held.

A. Abbreviated reporting obligation pursuant to Section 10 (3) LkSG

A2. Identified risks and/or identified violations

No violations of human rights or environmental obligations were identified during the reporting period.

Describe in a comprehensible manner which procedures can be used to detect violations at direct suppliers.

Violations at direct suppliers can be identified through personal observation, as part of media monitoring and via the established complaints procedure as well as the feedback from suppliers on the required supplier self-disclosure.

A. Abbreviated reporting obligation pursuant to Section 10 (3) LkSG

A2. Identified risks and/or identified violations

No violations of human rights or environmental obligations were identified during the reporting period.

Describe in a comprehensible manner which procedures can be used to identify violations at indirect suppliers.

Violations at indirect suppliers can be identified through personal observation, as part of media monitoring and via the established complaints procedure as well as the feedback from suppliers on the required supplier self-disclosure.