



ProSiebenSat.1
Media SE

POLICY STATEMENT

OF PROSIEBENSAT.1 MEDIA SE

FOREWORD

For the ProSiebenSat.1 Group, the respect for human rights, labour and social standards, as well as the protection of the environment, are integral components of sustainable corporate governance. We are aware of our responsibility to uphold human rights and protect the environment – and aim to operate where we can contribute to prosperity and development. Only through such efforts can we be successful as a company in the long term.

In January 2020, ProSiebenSat.1 Group joined the United Nations Global Compact, expressly committing to the ten UN Global Compact principles in the areas of human rights, labour standards, environment and climate, and corruption prevention. This reflects our clear stance on human rights according to the Universal Declaration of Human Rights by the United Nations, as well as high environmental and social standards. Additionally, ProSiebenSat.1 Group has committed to adhering to other internationally recognised standards for responsible corporate management, including the OECD Guidelines for Multinational Enterprises and the labour and social standards of the International Labour Organization (ILO).

For the Executive Board of ProSiebenSat.1 Media SE, good corporate governance is an essential part of responsible, transparent, and long-term value-oriented corporate management. It is supported by a corporate culture characterized by values, future orientation, respect, tolerance, integrity, and transparency. Our holistic and strategic approach forms the basis of our group-wide actions: we aim to strengthen the rights of people and the environment, prevent violations, minimize risks, and provide appropriate solutions.

In this policy statement, we explain how we particularly address the provisions of the Supply Chain Due Diligence Act (hereinafter "SCDDA") and outline human rights and environmental risks in our own business area and among our suppliers.



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Unterföhring, December 15, 2023

TABLE OF CONTENTS

1 HUMAN RIGHTS AND ENVIRONMENTAL EXPECTATIONS FOR OWN EMPLOYEES AND SUPPLIERS	3
2 OUR PROCEDURE FOR IMPLEMENTING HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE	3
3 PRIORITY RISKS IDENTIFIED AND MEASURES TAKEN	6
4 CONTINUOUS DEVELOPMENT	7
5 CONTACT PERSONS	7
6 AUDIT AND REGULAR REPORTING	7

1 HUMAN RIGHTS AND ENVIRONMENTAL EXPECTATIONS FOR OWN EMPLOYEES AND SUPPLIERS

Respecting human rights and environmental concerns and protecting them along the supply chain is a central pillar of the ProSiebenSat.1 Media SE and all its subsidiaries (hereinafter "ProSiebenSat.1"). We are always aware of our social responsibility, stand for respectful treatment of our employees and business partners and promote sustainable business practices and processes. As a company, we expect both our employees and our suppliers to be committed to respecting human rights and environmental concerns and to share our fundamental convictions and values.

The guideline for the behaviour of our employees is our [Code of Conduct](#). Here, we clearly and comprehensibly communicate our expectations as a company to our employees. The rules and behaviours outlined there apply to all employees, executives, and management of ProSiebenSat.1 alike.

From our suppliers, we expect them to commit to our values regarding human rights and environmental concerns. They are also expected to develop and implement appropriate and effective processes to prevent, detect, and address such risks or potential violations. This expectation is also reflected in our Code of Conduct for Business Partners, This expectation is also reflected in our [Code of Conduct for Business Partners](#), transparently formulating our expectations and values, which form the basis of our business relationships.

2 OUR PROCEDURE FOR IMPLEMENTING HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE

Given the diverse business areas of an internationally operating media company, people in ProSiebenSat.1's supply chain are exposed to various human rights and environmental risks. Improving the human rights situation along our supply chain involves a continuous cycle of individual measures and procedural steps that build on each other, complement each other, and collectively form an adequate and effective SCDDA risk management system. To identify, assess, and then minimize human rights and environmental risks, we have established the following measures and processes along our supply chain in particular.

2.1 Responsibilities for risk management

The basis of our SCDDA risk management is a transparent and non-overlapping assignment of roles and responsibilities. We have clear, internal responsibilities for both the operational implementation of due diligence and the monitoring of risk management.

The overall responsibility for compliance with human rights and environmental due diligence lies with the Executive Board of ProSiebenSat.1 Media SE. The Group Compliance and Corporate Procurement departments are primarily responsible for the operational implementation. Group Compliance is assigned tasks such as risk analyses in its own business area, including prevention and remedial measures, handling the complaint process, and internal and external reporting according to the SCDDA. Corporate Procurement is responsible for conducting risk analyses and, if necessary, prevention and

remedial measures for suppliers. Both departments regularly exchange information on their respective tasks and findings, working together for comprehensive control of human rights and environmental risks along the entire supply chain of ProSiebenSat.1.

To ensure adequate and effective monitoring of SCDDA risk management, ProSiebenSat.1 has appointed a Human Rights Officer. This position is held by the Senior Vice President Internal Audit P7S1 Group. The Human Rights Officer informs the Executive Board about SCDDA risk management at least once a year and, if necessary, on an ad hoc basis. Additionally, responsible persons, known as Risk Owners, have been appointed to manage risks in individual companies or functional/business areas (including Corporate Procurement). They are responsible for identifying and assessing risks in their respective areas and implementing, if necessary, prevention or remedial measures.

2.2 Risk analysis

To ensure a comprehensive and continuously updated overview of potential risks in our supply chain, ProSiebenSat.1 conducts both annual and event-driven risk analyses. An event-driven risk analysis may be triggered by changes in our business activities and associated changes in risk, or by actual indications that suggest a violation of a human rights or environmental obligation.

The results of the risk analyses described below form the basis for the design and implementation of appropriate prevention and remedial measures to minimize risks and address violations.

2.2.1 Procedure for regular risk analysis in own business area

To conduct the risk analysis in its own business area, responsible persons were appointed to collaborate with the respective departments in creating a risk catalogue with exemplary risk descriptions. The risk catalogue serves as a starting point for identifying and assessing risks; it is continuously checked for completeness and supplemented with additional risk descriptions if necessary.

Identified risks are assessed based on the criteria of probability of occurrence and severity of the violation, taking into account already implemented prevention measures. The assessment of risks is followed by documentation in the company-wide risk management tool.

2.2.2 Procedure for regular risk analysis of direct suppliers

The risk analysis for direct suppliers, i.e. suppliers with whom ProSiebenSat.1 has a direct contractual relationship, is carried out in two steps:

- 1) In the first step, potential high-risk suppliers are identified from the total population of all direct suppliers based on recognised country and industry indices and considering materiality thresholds.
- 2) For the identified potential high-risk suppliers, further information is collected in a second step (e.g., through supplier questionnaires) to perform a concrete risk identification and assessment. Based on this information, the identification of specific risks for each high-risk supplier is carried out using the risk catalogue. Subsequently, the identified risks are assessed based on the criteria of probability of occurrence and severity of the violation.

The assessment of risks is followed by documentation in the company-wide risk management tool.

2.2.3 Procedure for event-driven risk analysis

The SCDDA distinguishes between two types of event-driven risk analysis:

- 1) An event-driven risk analysis is to be conducted whenever there is an expected significantly changed or significantly expanded risk situation in the supply chain. This may be triggered by the introduction of a new product, a new project, a change in business activities, a changed business environment, or the acquisition of companies. Such a potential trigger must be promptly reported to Group Compliance. They analyse the significance of the trigger and, if necessary, initiate a risk analysis based on the criteria described above.
- 2) In addition, an event-driven risk analysis is always carried out when there are actual indications (such as information from the complaint process, press reports, etc.) that human rights or environmental risks exist with a direct supplier. Direct suppliers of ProSiebenSat.1 are those suppliers with whom ProSiebenSat.1 has no direct contractual relationships but who are nevertheless part of ProSiebenSat.1's value chain (e.g., subcontractors of a direct supplier). Corporate Procurement investigates relevant indications and, if necessary, initiates a risk analysis based on the criteria described above.

2.3 Preventive measures

To minimize human rights and environmental risks, we have established preventive measures both in our own business area and with regard to our direct suppliers.

In our own business area, we have implemented the following measures:

- **Training:** We promote respect for human rights and environmental concerns within our company through regular training of our employees. Specialized training in relevant departments and business areas ensures that employees have the necessary expertise in SCDDA risk management related to their assigned tasks.
- **Procurement strategies and practices:** The consideration of our human rights and environmental expectations is part of the supplier selection process.

For our direct suppliers, we focus on the specific situation: here, we have implemented risk-based prevention measures, including the following:

- **Contractual assurance:** Through contractual arrangements, we ensure that our direct suppliers commit to upholding human rights and environmental expectations in their own business area and address human rights and environmental expectations along their own supply chain to their suppliers.
- **Supplier Code of Conduct:** Furthermore, our [Code of Conduct for Business Partners](#) is part of our contractual terms and conditions, directly addressing our expectations and values regarding human rights and environmental concerns to our direct suppliers.

We review at least once a year and on an event-driven basis whether our measures to prevent or minimize identified risks and comply with human rights and environmental protection are effective.

2.4 Remedial measures

If human rights or environmental violations have already occurred or are imminent, we take remedial measures to end, prevent, or at least minimize the violation. In the case of suppliers, the implementation of remedial measures is carried out in close coordination with the affected business partner. If the implemented measures do not lead to the desired success and we identify systematic violations of fundamental human rights risks, termination of the business relationship with the supplier is the last resort. However, this can only be the last resort. Our focus is always on empowering the supplier or improving the individual situation of the affected/damaged party.

We review at least once a year and on an event-driven basis whether our measures to prevent or minimize identified risks and comply with human rights and environmental protection are effective.

2.5 Complaints procedure

ProSiebenSat.1 has implemented a complaints management system through which affected parties or third parties can submit low-threshold reports on any risks or violations. The complaints procedure aims to prevent negative human rights or environmental impacts as effectively as possible and, where necessary, establish effective remedial measures.

Further information on our complaints procedure, including contact persons and [Rules of Procedure](#), which sets out the detailed procedure, can be accessed on our [website](#).

We review at least once a year and on an event-driven basis the effectiveness of our complaints procedure.

2.6 Documentation and reporting obligations

We continuously document the fulfilment of our due diligence obligations. Based on this documentation, we annually compile a report on the past fiscal year. The report is published on our [website](#) no later than four months after the end of our financial year and can be viewed there for at least seven years.

3 PRIORITY RISKS IDENTIFIED AND MEASURES TAKEN

Based on the risk analysis we conducted, the following human rights and environmental risks have been identified for the ProSiebenSat.1 Group:

- **Identified prioritised risks in our own business area:**
ProSiebenSat.1's own business area comprises many companies pursuing different business models. The various companies are individually examined for human rights and environmental risks in the context of their respective business models. We are

aware of different, specific risk exposures, but within the conducted risk analysis, no prioritised human rights or environmental risks were identified in our own business area.

- **Identified prioritised risks in direct suppliers**

Based on the risk analysis, we have not identified prioritised risks among our direct suppliers.

- **Identified prioritised risks in indirect suppliers**

At the time of preparing this policy statement, there is no evidence or indication that suggests a prioritised human rights or environmental risk among any of our indirect suppliers.

Since no prioritised risks were identified in our own business area or among direct suppliers based on our risk analysis, there is currently no need for further implementation of prevention or remedial measures.

4 CONTINUOUS DEVELOPMENT

ProSiebenSat.1 Group is aware that the implementation of human rights due diligence in its own business activities and in supply chains is an ongoing process. This policy statement evolves in conjunction with the implementation of human rights and environmental due diligence and is continuously adjusted by us. While it is a dynamic document, it contains our binding principles for respecting human rights according to the Universal Declaration of Human Rights of the United Nations and addressing environmental concerns throughout our supply chain. If changes occur in the context of our Supply Chain Due Diligence Act (SCDDA) risk management or its review, we will adapt or update this policy statement accordingly.

5 CONTACT PERSONS

If you have questions related to this policy statement or further inquiries regarding human rights and the environment, you can contact Group Compliance at (compliance@prosiebensat1.com).

If you have any information about human rights or environmental risks in our own business area or at suppliers, please report them through our established complaints procedure → <https://prosiebensat1.integrityline.com>.

6 AUDIT AND REGULAR REPORTING

At ProSiebenSat.1 Group, we will annually report publicly on our due diligence activities in the supply chain, including disclosing the results of the risk assessment in the supply chain and providing a detailed description of our measures to mitigate identified risks. We will also assess the effectiveness of these measures.

