

CODE OF CONDUCT

Our Code of Conduct for the Rheinische Post Media Group

Status: January 2024

Dear colleagues,

The business areas of the Rheinische Post Media Group are more diverse today than ever before. We publish the highest-circulation daily newspaper in the Rhineland, are one of the five highest-circulation newspaper publishers in Germany, through General-Anzeiger Bonn GmbH and our majority shareholding in the Saarbrücker Zeitungsgruppe, publish a large number of advertising papers, are involved in radio stations and digital growth areas, operate a large office and shopping center in Düsseldorf city center and are also internationally active through our specialist media publishers.

Our media company thrives on the commitment, creativity and expertise of our employees. Journalistic content was and remains the driving force behind our company's success. As a press company, we have a special responsibility toward society and fulfill this with journalistic due diligence. The same applies to our dealings with colleagues, employees and business partners: At our media company, communication and treating each other with respect are not only part of the business, but also of the corporate identity. Dialog with one another and responsible action are part of our corporate activities.

This Code of Conduct is a guideline – it supports us in our day-to-day work, strengthens mutual understanding and helps us to be a successful media company in the long term. The principles laid down in this Code are minimum standards that are binding for every employee in the Media Group and the management board. These principles are intended to help us overcome legal and ethical challenges in our daily work, strengthen mutual respect for a prosperous working relationship and a fruitful exchange of ideas, thereby ensuring our business partners have confidence in the performance and integrity of our company.

We therefore ask you to familiarize yourself with the content of our Code of Conduct and to integrate it into your daily conduct and decisions.

Your management board of the Rheinische Post Media Group

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A. PRINCIPLES OF OUR ACTIONS

1. GENERAL PRINCIPLES

1.1 *OUR STANDARD: We comply with applicable law at local, national and international level.*

- a) Violations of applicable law may have consequences under criminal and civil law. We therefore require our managers to familiarize themselves with the standards and internal company rules relevant to their area of responsibility and to sensitize their employees to ensure compliance with them.

We attach particular importance to respecting company property. This includes not only the responsible handling of work equipment and other company assets, but also the respectful treatment of intellectual property.

We condemn fraudulent activities in any form. All employees are encouraged to participate in the effective combating and prevention of fraud. Violations and misconduct can be disclosed to superiors or via the whistleblower system.

- b) Efforts must be made to ensure that not even the suspicion of a criminal offense arises. All employees of the Rheinische Post Media Group are therefore required to be particularly sensitive when dealing with this topic.

If there is any doubt about the legal admissibility of an action, the contact persons named in section C must be consulted.

- c) We adhere to the rules of fair competition. We believe in a free and socially responsible market order. We refrain from any activity aimed at gaining business advantages through unfair or illegal behavior. In particular, it is not permitted to agree on prices, divide customers and/or sales territories between competitors, carry out anti-competitive boycotts or use other unfair competition methods.

Advice on antitrust and competition law issues should be obtained from the legal department as early as possible.

- d) We act in accordance with the Code of Conduct. The Code of Conduct, all guidelines and the values and management guidelines developed by the company are binding for all managers and employees. Managers are particularly important role models for all other colleagues. Violations of this Code of Conduct damage the company and its corporate culture.

1.2 *DATA PROTECTION*

We process the personal data of our employees, customers and other business partners (e.g., name, address, telephone number, date of birth, etc.) in accordance with the applicable legal provisions on the protection of personal data and data security. Our **Group Data Protection Policy** contains strict requirements for the processing of personal data of employees, customers

and other business partners. We regularly advise, support and train our employees through our Group Data Protection Officer.

1.3 IT SECURITY

We are aware that our daily work is particularly influenced by computer systems and other technical devices, and that working without these systems would hardly be possible. At the same time, the use of these technical systems entails the risk of confidential data and information being lost or stolen. The **Group Information Security Policy** regulates the use and secure operation of IT systems. We use appropriately licensed software that has been approved by IT management and the Group Data Protection Officer. Our employees use secure passwords and handle information stored for technical purposes responsibly. They pay particular attention to the content of e-mail attachments and downloaded files.

If a security incident is suspected, this must be reported to the IT service (hotline) immediately and with priority over daily business.

1.4 *OUR DEALINGS WITH ONE ANOTHER: In cooperation with all employees, we maintain a non-discriminatory working environment that is characterized by mutual respect.*

We live our values and management guidelines. The five values of customer focus, respect and appreciation, communication, innovation and sustainability, as well as the three management guidelines of entrepreneurial thinking, development and cooperation provide us with a long-term common basis to guide us in our daily interactions and professional activities.

- a) Respectful interaction with one another is a key element of our corporate culture. We wish to maintain a pleasant working environment in which equal opportunities prevail and bullying, intimidation and harassment are condemned and combated. Our managers should actively work towards such respectful behavior.
- b) To promote a positive working environment, we encourage our employees to take an active role in shaping it. Critical issues should be addressed openly and clarified in a fair manner in cooperation with all parties involved.
- c) No one may be treated inappropriately, disadvantaged, favored, harassed or marginalized, in particular because of their race or ethnic origin, skin color, nationality, faith, ideology, gender, age, physical constitution, appearance or sexual identity. Personnel decisions such as hiring, promotions and disciplinary measures must be made free of any discrimination. In particular, considerations that contradict the aforementioned principles are inadmissible.
- d) If an employee has the feeling of being mistreated, contrary to the above-mentioned values, the respective line manager, colleagues from the Human Resources department and the persons named in section C are available for a clarifying and confidential discussion.

1.5 *CONFLICTS OF INTEREST: We encourage our employees to disclose conflicts of interest so that they can be resolved quickly. We clearly separate our personal interests from the interests of the company.*

- a) In principle, employees should avoid situations that could lead to personal conflicts of interest. In particular, offers and contracts may only be made or concluded for business and objective reasons for the benefit of the company. When procuring for our company, our company's **purchasing guideline** must be observed. Personal advantages granted by contractual partners, customers or other business contacts as well as individual financial interests contradict our values. Direct investments in customers and clients also represent a potential conflict of interest. Every employee must also inform the respective line manager and the HR department in advance if the employee intends to take up another employment relationship and, as a rule, has to receive express approval for this. When settling expenses, care must be taken to ensure that only expenses that are justified for official purposes are eligible for reimbursement. If employees express private opinions in public, they must not give the impression that these opinions are those of the company.
- b) A potential conflict of interest also exists if employees have a personal relationship. Managers and employees with personnel responsibility may not hire or assign family members without informing and obtaining the approval of their supervisor and the HR department. If such employment is approved, the hiring manager may not determine the remuneration or other benefits for this employee without the involvement of the line manager and the HR department. Within this context, family members are spouses, life partners, parents, children and other close relatives. Other close relatives include grandparents, grandchildren, parents-in-law and siblings.
- c) If any employee should be found to be in a situation in which the private interests conflict with those of the company, we encourage the employee to address this conflict openly. Such conflicts of interest can place a heavy burden on the employees themselves, but can also mean that decisions affecting the company can no longer be made in a neutral manner. Our managers are required to work with the employee concerned to find a solution that does justice to both interests to the greatest possible extent.

2. CONDUCT TOWARDS BUSINESS PARTNERS, AUTHORITIES AND OTHER THIRD PARTIES

2.1 *HONEST BUSINESS: We fulfill our contractual obligations to our business partners in compliance with the law and expect them to comply with the applicable laws.*

Our business partners expect us to comply with our contractual obligations. In return, we expect them to act with integrity and respect the law in their business relationship with the Rheinische Post Media Group.

2.2 *ACCEPTANCE AND DISTRIBUTION OF GIFTS*

- a) The acceptance and distribution of gifts that serve the purpose of maintaining and promoting business relationships may be permitted in moderation. However, any form of bribery and corruptibility is prohibited. Care should be taken to ensure that the gift/invitation does not have an excessively high value and does not appear socially inappropriate in view of the recipient's standard of living.

In addition, any requirements communicated to us by third parties (compliance guidelines, as well as guidelines, etc.) must be observed.

However, the assessment of whether a benefit is permissible always depends on the specific circumstances of the individual case. Therefore, in addition to the value, it is also possible to take into account the purpose of the gift, the position/professional status of the recipient and the frequency and relationship between the giver and the recipient. In addition, a gift must always be given openly in order to avoid even the appearance of secrecy.

Objective: The objective must not be to influence the recipient's free will. Accordingly, benefits that are made to a company without naming a specific recipient and those that are not made in connection with specific points of business contact are more permissible.

Professional position: The type and amount of a permissible gift may vary from recipient to recipient and may depend in particular on the professional position of the recipient.

Frequency: If the grant exceptionally exceeds the value limits set for our company, it may still be permissible in exceptional cases if it is within the usual value limits (e.g., in the case of VIP lounges) and is not granted more than once or twice a year.

However, if you are ever embarrassed to receive a gift that you are not allowed to accept, thank them politely and explain that you are not allowed to accept it. Many companies are now familiar with the compliance rules and accept this rejection.

2.3 *INVITATIONS, HOSPITALITY, TRAVEL*

Invitations in connection with hospitality, events and travel may only be accepted or offered if they do not exceed the limits of customary business practice or the personal standard of living of the participants, and if the invitation does not influence business decisions or editorial reporting. The impression must already be avoided that the decision could be associated with irrelevant considerations due to the invitation. In addition, employees may only accept invitations if they serve legitimate business/editorial purposes, are not of unreasonably high value and any hospitality is provided as part of normal cooperation. In cases of doubt and for higher-end invitations, the supervisor must be consulted

The tax regulations must also always be observed. When in doubt, please clarify any uncertainties with your colleagues in the tax department.

2.4 *SPECIAL CASE: PUBLIC OFFICIALS*

Invitations or gifts to public officials involve a high risk. Bribery of a public official is a criminal offense. Therefore, our employees are not permitted to give gifts to public officials.

2.5 *DEALING WITH AUTHORITIES: We are committed to transparent and honest dealings with authorities.*

We attach great importance to transparency in our dealings with authorities, political institutions and courts.

In the event of an official request (especially from customs, police or the public prosecutor's office), you must first contact management and the legal department to ensure that all legal

requirements are met. In particular, the provision of information and the submission of files should in any case only take place after consultation with the legal department.

3. INDEPENDENCE OF THE EDITORIAL TEAM/REPORTING

3.1 *COMPLIANCE WITH JOURNALISTIC DUE DILIGENCE OBLIGATIONS: We are committed to independent and responsible reporting while respecting the rights of those affected and complying with journalistic due diligence obligations.*

- a) Our reporting should comply with the principles of the Press Code. We respect the rights of the data subjects, in particular the general right to privacy (Art. 2 para. 1 in conjunction with Art. 1 para. 1 of the German Basic Law). If there is any uncertainty about the permissibility of reporting, we encourage our employees to seek advice from the legal department before an article appears in our media.
- b) We uphold the reputation of the press in the public eye. We take our responsibility as an opinion-former toward the public very seriously. We pay attention to truthful reporting and attach great importance to the separation of advertising and editorial content. Our editorial content is free from private or commercial influence. We do not give in to external political influence. Any form of sponsorship must be identified in accordance with the relevant regulations.

3.2 *INDEPENDENCE OF OUR EDITORS: We respect the journalistic independence of our editors in the procurement, processing and dissemination of information.*

Editorial work is based on freedom of the press and freedom of opinion and information, which the Rheinische Post Media Group is committed to upholding and promoting. We do not exert any influence on our editors in the procurement of information or its processing and dissemination. In particular, management does not exert any editorial influence. However, if there are any uncertainties regarding the admissibility of a contribution, management is always available to support its employees.

4. DEALING WITH INFORMATION/CONFIDENTIALITY

4.1 *INTELLECTUAL PROPERTY: We protect intellectual property and treat information confidentially.*

- a) As a publishing company, the protection of intellectual property is particularly important to us. Therefore, we apply the following principle: No distribution, reproduction, performance or exhibition of copyrighted works without appropriate permission. If you have any questions or uncertainties, the legal department will be happy to help at any time.
- b) We conduct our business transparently and document it properly. Our employees in charge of documentation are aware of their responsibility and work with the necessary precision. You keep the documents and do not tamper with them.
- c) We ensure that the treatment of "insider information" remains within the legal limits. We do not use such information improperly and do not attempt to gain financial advantage by passing it on. If you have any questions, you should seek advice from the legal department.

4.2 CONFIDENTIALITY

- a) Business secrets must be protected and treated in strict confidence. All employees are expected to protect all confidential information to which they have access.
- b) Documents marked as "confidential" are only intended for the named recipients and may never be distributed and/or published. This includes, for example, contracts, business plans, personnel information, financial data in whatever form, business or editorial considerations. The content of an e-mail can be just as confidential as a confidentiality agreement. If you need a confidentiality agreement, please contact the Legal Department, which will provide a sample.

5. COMPLIANCE WITH HUMAN RIGHTS - PEOPLE AND THE ENVIRONMENT

5.1 *WORKING ENVIRONMENT: We provide a working environment that is not harmful to the health of our employees.*

- a) We comply with the statutory regulations on health in the workplace in order to provide our employees with a working environment that is free from health hazards. Our managers are obliged to check and enforce compliance with these regulations. We encourage our employees to contact their line manager or the Human Resources department if they have any doubts about the existence of a health risk.
- b) In addition, compliance with the statutory regulations on working hours is important to us. Our employees receive an appropriate wage for their work in accordance with the applicable regulations.
- c) Our employees are free to exercise their collective rights.

5.2 *SAFE PRODUCTS AND SERVICES: We produce and distribute safe products and services.*

We aim to offer our customers only safe and high-quality products and services. Any defects and/or hazards identified or considered possible are reported immediately.

5.3 *ENVIRONMENT / ENVIRONMENTAL PROTECTION: We treat our environment responsibly and actively protect it.*

We strive to produce efficiently, save resources and reduce emissions. We act innovatively, using environmentally friendly materials (e.g., paper with high recycling rates) and energy-efficient processes and machines. A regular and close exchange between the specialist departments relevant to production has been established. This exchange, as well as our association work and our network, promote synergies and the creation of a pool of ideas for sustainability-related topics.

We pursue the goal of informing and sensitizing our employees, but also readers, users, listeners and customers about the topic of sustainability and environmental protection, in addition to creating identification with the topic in all its facets.

The Rheinische Post Media Group regularly calls on all employees to consider the consequences of their actions on people, the environment and society in everyday work processes (waste

separation and reduction, mobility, etc.), to be aware of their ecological impact and to do their best to avoid environmental pollution.

5.4 *SUSTAINABILITY: As a media company, we are aware of our special responsibility for sustainable action.*

As a media group with regional roots, we make a valuable contribution to preserving a home worth living in. In our regions, we see ourselves as local pioneers and innovative drivers of sustainability. We reduce the environmental impact of our activities and pay attention to the best possible protection of the climate and resources.

5.5 *OUR SUPPLY CHAIN: We observe our duty of care in our supply chains.*

We also require our suppliers and direct contractors to ensure the health and safety of their employees, to respect human rights and to treat the environment responsibly.

B. DEALING WITH VIOLATIONS/WHISTLEBLOWER SYSTEM

In order to identify possible misconduct at an early stage and take action, we rely on employees raising concerns. All employees therefore have the opportunity to report potential violations of legal regulations or internal rules. The report must be made to the best of your knowledge and belief; all available information on the suspected infringement should be provided.

Employees can forward the information to their line manager, the HR or legal department and - if available – to the works council. You also have the option of using the certified whistleblower system. Any violations can be submitted to the following compliance ombudsman:

Dr Johannes Dilling, Landgrafenstr. 49, 50931 Cologne

Phone: 0221 / 933 107 40

E-mail: info@ra-dilling.de

Website: <https://www.ra-dilling.de>

Portal for notes: <https://www.safewhistle.info/>

All reports submitted internally or externally to the compliance ombudsman are treated in strict confidence, with the utmost care and anonymously, if requested. This applies in particular to the personal data of whistleblowers (statutory duties to provide information remain unaffected by this). The whistleblower will not suffer any disadvantages from a tip given with the best of intentions. However, the contact points must not be misused for slanderous and deliberately untrue reports.

The course of the investigation and the rules of procedure can be found under the following link:

<https://www.rheinischepostmediengruppe.de/footer/hinweisgebersystem/hinweisgebersystem-und-verfahrensordnung-der-rheinische-post-mediengruppe-gmbh>

C. CONCLUDING REMARKS AND CONTACT PERSONS

This Code of Conduct applies to all companies of the Rheinische Post Media Group. The respective management and superiors ensure that all employees are familiar with the current version of the Code of Conduct at all times. Regardless of this, your employee representative will continue to be available to you as a contact person.

Sometimes doubts about the permissibility of a commercial act cannot be avoided. This guide is intended to provide orientation for making legally permissible decisions that are also in line with the company's principles.

Should any uncertainties arise in individual cases as to whether a decision is actually in line with the Code of Conduct and the applicable laws, the following contacts are available to listen to your concerns at any time, in addition to your line manager and the managing directors of the individual companies in the Rheinische Post Media Group:

- Group Data Protection Officer: Mr Frank Koch: e-mail: frank.koch@rheinische-post.de
- Head of Legal Department: Dr Monika Böhr, e-mail: monika.boehr@rheinische-post.de
- Head of Human Resources: Mr. Volker Kaufels, e-mail: volker.kaufels@rheinische-post.de
- Law firm Dr Dilling, e-mail: info@ra-dilling.de as ombudsman and external compliance officer

Düsseldorf, January 2024