

Group non-financial report

STRÖER SE & CO. KGAA, COLOGNE

DECEMBER 31, 2021

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STRÖER

Background information about the Ströer Group

Ströer SE & Co. KGaA, Cologne ('Ströer Group'), is a leading German provider of out-of-home media. We offer advertising customers individualized and fully integrated, end-to-end solutions along the entire marketing and sales value chain. Through our OOH+ strategy, we focus on the strengths of the OOH business, underpinned by our related business segments Digital & Dialog Media and DaaS & E-Commerce.

The Ströer Group markets and operates several thousand websites, primarily in German-speaking countries, and operates approximately 300,000 advertising media in the out-of-home segment. Our portfolio includes all forms of outdoor advertising media, including traditional poster media, exclusive advertising rights at train stations, and digital out-of-home media. In its dialog marketing business, the Ströer Group offers its customers wrap-around performance-based solutions ranging from location-specific or content-specific reach and interaction across the entire spectrum of dialog marketing through to transactions. And in the digital publishing business, we publish premium content across all digital channels and offer one of Germany's widest reaching networks with services such as t-online.de and various special interest sites.

In 2021, the Ströer Group generated revenue of EUR 1.6b. We employ around 10,000 people at more than 100 locations. Ströer SE & Co. KGaA is included in the MDAX index of Deutsche Börse. For detailed information on the business model and organizational structure, please refer to the relevant sections entitled 'Business model' and 'Segments and organizational structure' in 'Background and strategy of the Ströer Group' in Ströer SE & Co. KGaA's combined management report of the Company and the Group. This was published in the investor relations section of our website on March 30, 2022.¹

¹ Available at: <https://ir.stroeer.com/investor-relations/financial-reports/>

Background information about the group non-financial report

This separate combined non-financial report ('group non-financial report') fulfills the reporting requirements of Ströer SE & Co. KGaA under the German CSR Directive Implementation Act (CSR-RUG) (section 289b and section 315b–c of the German Commercial Code (HGB)). This year, for the first time, the non-financial report also fulfills the new disclosure requirements under the Taxonomy Regulation (EU) 2020/852.

The disclosures apply to both Ströer SE & Co. KGaA and the Group. In addition to the description of the business model and general information, the report contains disclosures on certain non-financial aspects to the extent that they are necessary for an understanding of the net assets, financial position, and financial performance of the Group as well as for an understanding of the impact of our business activities on the non-financial aspects. The information required under the EU Taxonomy Regulation is also disclosed.

The disclosures relate to the reporting period from January 1 to December 31, 2021. The report covers all subsidiaries that are fully consolidated in the consolidated financial statements. We have indicated where this is not the case.

The Audit Committee and Supervisory Board examined this group non-financial report, which was prepared by the Board of Management for the Ströer Group as at December 31, 2021. The documents were discussed in detail at the meetings and the Board of Management answered additional questions raised by members of the Supervisory Board. The Supervisory Board raised no objections following its review.

Method and approach

The materiality analysis of the aspects to be reported on under the CSR-RUG is carried out each year on the basis of a systematic two-stage evaluation process within the Ströer Group. We are thereby following the intention behind the legislation, i.e. identifying and reporting on those aspects that are material both to the Company's net assets, financial position, and financial performance and to the reportable aspects themselves.

The first step was to draw up a catalog of potential material topics that are aligned with the aspects of the CSR-RUG framework. The topics were selected using the Global Reporting Initiative (GRI) standards and an analysis of the most important sustainability ratings. Based on this, a questionnaire was sent to all relevant segments of the Ströer Group with a request for comments. One of the primary aims of this survey was to provide an internal evaluation of the impact of the topics on the segments' net assets, financial position, and financial performance.

The next step was to evaluate the results of this survey in follow-up workshops. The internal departments/service functions responsible for those topics that were considered to be material were invited to attend the workshops. Potential non-financial risks arising from the business activities of the Ströer Group on the aspects covered by the CSR-RUG were also discussed.

Finally, the process and its results were reviewed by the Supervisory Board's ESG officer to ascertain whether any adjustments were required.

Material aspects and topics

At the end of the two-stage process, the material topics for which disclosures are required in this non-financial Group report under the CSR-RUG had been identified (see table below).

Aspect	Topics disclosed in 2021
Employee matters	<ul style="list-style-type: none"> • Working conditions • Vocational training & staff development • Diversity & equality • Occupational health & safety
Governance	<ul style="list-style-type: none"> • IT security • Data protection • Anti-corruption & bribery matters
Environmental matters	<ul style="list-style-type: none"> • Based on the results of the materiality analysis, environmental matters and related topics are not addressed in depth in this report.

	<ul style="list-style-type: none"> • In order to address sustainability in the round, however, we have included the environment aspect as a central pillar of our 2030 sustainability strategy and made climate action a focus area. This reflects the considerable social importance of this topic. We aim to be carbon neutral across the business as a whole by 2025. We have already introduced a range of measures and continued to drive forward with our efforts in this area in 2021. By the end of 2021, 80% of our entire OOH infrastructure was already running on green electricity and our aim is to make this share even larger. The switch to green electricity is supported by the introduction of various energy-efficiency measures for our advertising media and the optimization of our use of materials. We are already running carbon neutral advertising for our customers. Unavoidable greenhouse gas emissions are offset through a certified climate change mitigation project. • We report in detail on this and other measures in our annual sustainability report, which we have been publishing since 2020.
Social matters	<ul style="list-style-type: none"> • Based on the results of the materiality analysis, social matters and related topics are not a focus of this report. • However, this aspect is addressed through the topics of IT security & data protection, which have an equal bearing on both corporate governance and social matters.
Human rights	<ul style="list-style-type: none"> • Based on the results of the materiality analysis, human rights and related topics are not a focus of this report. • However, this aspect is addressed through the topics of working conditions, diversity & equality and occupational health & safety, which deal with human rights issues in the context of the workforce.

IT security was included in the report for the first time this year. For reasons of transparency and continuity, we decided to continue reporting on our activities to combat corruption and bribery, despite this being assessed as only of moderate relevance this year. This aspect is brought together with IT security & data protection in our governance, risk & compliance system, in order to present a complete picture and highlight the interdependencies.

Our annual sustainability report contains an in-depth account of our sustainability activities in respect of environmental, social, and governance topics. The latest report can be downloaded at <https://www.stroeer.de/en/sustainability/>.

Disclosure under the EU Taxonomy Regulation

This year, for the first time, Ströer SE & Co. KGaA is subject to the new disclosure requirements under the Taxonomy Regulation (EU) 2020/852. An evaluation process was therefore established in 2021 and will be carried out annually for the Ströer Group in the future. The first step in this process is to compare the business activities of the Ströer Group with the sectors and business activities covered by the EU taxonomy. In particular, this involves examining the corresponding NACE codes and the definitions and comments of the EU, and discussing these with all the relevant business segments. The next step involves an assessment of the business activities of Ströer that fall within the EU taxonomy, and are therefore considered eligible, to establish whether they are aligned with the EU requirements. For taxonomy-aligned business activities, the proportion of revenue, CapEx and OpEx is then determined. For all other business activities, no revenue, CapEx and OpEx is reported.

For 2021, the evaluation process revealed that the Ströer Group does not currently fall within the scope of the EU taxonomy. Neither the NACE codes on which the EU taxonomy is based nor the descriptions of taxonomy-eligible business activities correspond to the business activities of the Ströer Group. In the light of these findings, no further examination of taxonomy alignment was carried out. Accordingly, no taxonomy-eligible or taxonomy-aligned revenue, operating expenditure, or capital expenditure is reported, nor is there any more in-depth classification in accordance with the EU alignment criteria.

Classification of the business activities of Ströer SE & Co. KGaA, 2021 financial year	Revenue (EUR m)	Share of revenue (%)
Taxonomy-eligible business activities	0	0
Taxonomy-aligned business activities	0	0
Not taxonomy-aligned business activities	0	0
Not taxonomy-eligible business activities	1,627	100

The results reflect the fact that the Ströer Group and its segments operate in sectors that have relatively low greenhouse gas emissions. This is consistent with the findings of the process under the CSR-RUG, on the basis of which environmental matters are not dealt with in depth in this report. Nevertheless, because of its high social importance, the Ströer Group has decided to define climate action as a focus of its sustainability strategy. By 2025, the Company aims to have made its entire business carbon neutral, and we are also continuously working on improving our energy and resource efficiency. In this way, we aim to make our contribution toward achieving the EU's environmental goals.

Employee matters

General

Committed, reliable, and competent employees are key to the Ströer Group's ability to innovate and increase the value of the business. At Ströer, employees can realize their potential as individuals and, through their passion, dedication, responsibility, and respect, contribute to our Company's success.

The Ströer Group wants to be an attractive employer with which employees can identify and for which they enjoy working. We therefore strive to remain an employer of choice, for example by pursuing a sustainable HR policy, offering flexible working time models, and providing additional benefits such as the company bike-leasing scheme (job bike) and our company kindergarten and cafeteria at Ströer's headquarters.

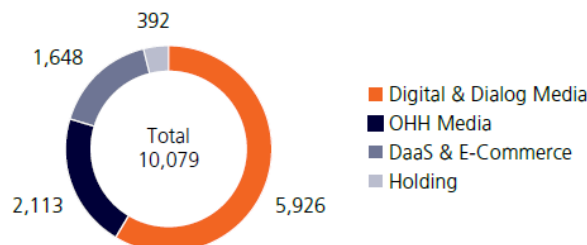
The importance of employee matters is also reflected in the pivotal position of HR within the organizational structure. The head of HR reports directly and on a regular basis to the Board of Management. She is also a member of the executive committee, which is the second-highest-level management body in the Ströer Group.

Workforce information

At the end of 2021, the Ströer Group had 10,079 full-time and part-time employees (prior year: 10,003). The slight increase was a result of organic growth.

Employees by segment

As of Dec. 31, 2021



At the end of the year, foreign Group entities employed a total of 1,590 people, which represents 16% of the total headcount. For efficiency reasons and due to differing legal frameworks, the following strategies and initiatives have only been rolled out at the Group entities in Germany so far.

Our approach

Staff loyalty, satisfaction, and health, along with the promotion of diversity and its acceptance as an essential aspect of the organization are central planks of our HR policy. The employer brand JUMP! also stands for the commitment and willingness to engage with these issues. It is used both in external communications and within the Group. We engage in continuous internal communication as a matter of course and this creates space for dialog and discussion.

Against this background, we initiated further measures in 2021 to enhance our attractiveness as an employer and to maintain employee satisfaction.

Working conditions

Modern working conditions are key to long-term employee retention. Ströer offers its employees needs-based options for adapting their working hours to their personal situation. These include company-wide arrangements and customized arrangements for individual employees. We are implementing progressive working practices as part of the digitalization of the workplace. In addition to *Vertrauensarbeitszeit* (a system of working time based on mutual trust), these include arrangements such as individual part-time working or hybrid work patterns that we call Flex Work (working from a different location). Flex Work has already been successfully launched at several entities. In 2021, a total of 2,921 employees across the Group (29%) were employed on a part-time basis.

In addition, our Urlaub+ model enables employees to increase their vacation allowance by up to 20 days' unpaid leave. Here too, the objective is to increase flexibility.

An ethos of attractive working conditions goes hand in hand with purposeful employee communication. This is especially true in view of the growth of the Ströer Group and the diversification of our business. We have created multiple forums for communicating our strategy and other developments at the Ströer Group to our employees.

At the quarterly town hall meetings, the Board of Management reports to employees on business performance in the preceding quarter, relays the latest news and current focus areas within the Ströer Group, and answers questions from employees. Those employees who do not work at the headquarters can use a web-based solution to participate in the town hall meetings.

Regular interviews with executives from different areas of the Company are published on the intranet in order to keep employees up to date on their activities, areas of focus, and current topics of importance.

Due to the growth in headcount in recent years and our numerous different locations in Germany, the Ströer Group has created a central digital information point for all employees. An overview of all information, news, and press releases relating to the Ströer Group or our industry can be accessed via an app and on the website. This includes press releases on recent customer projects, related newspaper articles, and the latest reports from the intranet. This provides all employees with comprehensive information about the Company and current developments in real time.

Vocational training & staff development

We believe that training young people is part of our social responsibility and we offer a variety of ways for young staff to develop. In 2021, the Ströer Group provided vocational training to a total of 154 talented young people throughout Germany (December 31, 2021). As well as offering traditional vocational training, Ströer also expanded its degree apprenticeship program which includes work-based bachelor's degrees and, since 2018, master's degrees. The aim is to provide support through extensive on-the-job training and to maintain consistency in the number of trainees and the proportion of trainees to whom we subsequently offer permanent positions.

Ströer also offers its employees opportunities to achieve their professional goals within the Ströer Group. The groupwide JUMP'n'grow! program launched in 2019 is a management development program that usually lasts twelve months. Employees are selected by the executive committee and offered targeted support. The program includes various training courses and workshops and is supported by individual mentoring by senior executives. As a result of the pandemic, some parts of the program took place digitally in

2021. In addition, digital self-guided courses were offered and regular book discussions were established, with the face-to-face workshops being postponed to a later date.

The JUMP up program, which provides ongoing support for executives, was also continued in 2021. The program comprises various modules in which HR employees who are qualified trainers prepare content tailored to participants' needs and roll it out to all offices in Germany. In 2021, digital workshops were conducted on the topic of digital leadership. A number of skills training sessions were conducted for managers on topics such as working with decentralized teams ('lead over distance'), authenticity, modern leadership, appreciation & communication, and delegation, and were then rolled out more widely. The digital working modules (e.g. 'meet over distance') were offered to all groups of employees and demand was encouragingly high. Further modules have been planned for 2022. We have also expanded our training and development program to include the JUMP'n'train! interactive learning platform. This new digital platform brings together existing knowledge and career development activities and can be accessed by our employees at any time. Content can be offered at any location thanks to new technologies such as virtual classrooms. This means that employees at other locations are able to take part in a greater number of professional development and training courses as well as live online courses and thus expand their expertise.

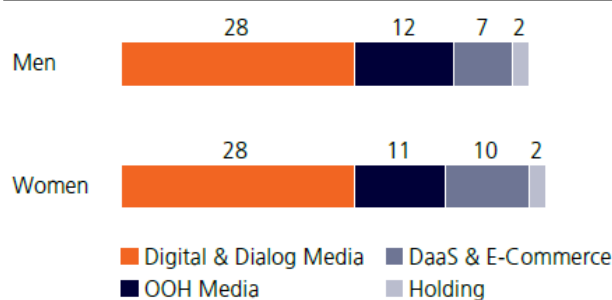
Diversity & equality

We promote a balanced and diverse workforce. In keeping with the philosophy ‘we hire for attitude’, we frequently find that enthusiasm and the desire to achieve count more than formal qualifications. The Ströer Group employs people from more than 60 nations with different skills, from different backgrounds and cultures, people with diverse sexual orientations, and in all age groups. Diversity is a catalyst for ideas and a cornerstone for the sustainable growth of our Company and, not least, is a reflection of our customers and of society. In 2021, it therefore seemed natural to sign the Charta der Vielfalt [Diversity Charter], one of the biggest initiatives in Germany to promote diversity in the workplace. By signing the Charter we are publicly committing to promote a diverse working environment at Ströer and to report on our progress. We also used Diversity Day in Germany in 2021 to draw attention to the subject on our digital screens and to have interesting discussions with our employees, dispel preconceptions, and raise awareness of language and attitudes.

Ströer employed an almost equal number of women and men in 2021. As at the end of the year, 51% of the Ströer Group’s employees were female and 49% were male (prior year: 51% female and 49% male). The gender balance is partly due to our attractive working time models that help our staff reconcile work and family life, for example.

Gender structure by segment

2021 In %



As a founding member of the Cologne-based Mit Frauen in Führung [women in the lead] association, Ströer campaigns for equal development opportunities for women and men. A total of 14 major Cologne-based companies are members of this association, which invests in the future of female executive staff, primarily through a cross-mentoring program. Ströer is also involved in the Women into Leadership (IWIL) initiative, which

encourages networking and the sharing of ideas and information between women in leadership positions.

We also consciously champion women in leadership positions through our JUMP'n'grow! program for tomorrow's executives.

We refer to the decisions supporting the participation of women in leadership positions in our annual corporate governance declaration pursuant to section 289a HGB. The Board of Management of Ströer Management SE, Düsseldorf, which is the general partner of Ströer SE & Co. KGaA, and the Supervisory Board of Ströer SE & Co. KGaA set these targets in March 2022. The corporate governance declaration was made permanently available to shareholders on the Company's website at <https://ir.stroeer.com/> in the corporate governance section.

Occupational health & safety

As in 2020, the Ströer Group protected the health of its employees in 2021 by enabling them to respond flexibly in line with their individual circumstances to the challenges of the global SARS-CoV-2 pandemic. Three important elements of this approach were: clear rules on hygiene and behavior, the use of Flex Work, and the possibilities provided by the expansion of digital working using tools such as Microsoft Teams. We adapted our rules as infection rates and the legal requirements changed, in order to protect the health of our employees while ensuring we were able to maintain a sufficient presence. This included providing free rapid tests for self-testing at our workplaces. In December 2021, we were also involved as a Group in the national booster campaign. In total we carried out an additional 95 booster vaccinations at the Cologne site.

The employee survey on mental health problems and stress (known internally as 'Healthy Workplace'), which was developed jointly with our subsidiary Statista, was successfully rolled out to all sites in 2021. Work has already begun on developing measures from the findings, and these will be implemented over the course of 2022.

The Ströer Group is also subject to the provisions of the German Act on the Implementation of Measures of Occupational Safety and Health to Encourage Improvements in the Safety and Health Protection of Workers at Work. We take the action necessary to ensure the safety and health of our employees at work. We use a variety of modules for this,

such as training, provision of first-aid equipment and training of first aiders, and a comprehensive company medical service. We also offer our staff other voluntary benefits, such as health days, or physiotherapy sessions at our Cologne facility.

Governance

General

Good corporate governance is an integral element of our corporate culture and a key aspect of our day-to-day activities. To reflect the importance of this matter, since 2021 the compliance, risk management, internal control system, internal audit, data protection, and IT security functions within the Ströer Group have been brought together in an integrated governance, risk and compliance system (GRC system). We also address the aspects that have been identified as material topics – IT security & data protection, and anti-corruption & bribery – together as one package.

This comprehensive and integrated approach enables us to develop synergies between different areas of corporate governance, identify interdependencies at an early stage and intervene where necessary. We closely coordinate strategies, processes, people, and technology with a view to efficiency and effectiveness. The aim of our integrated approach is not solely to comply with our legal obligation to implement an appropriate and effective governance, risk & compliance management system. We also want to firmly embed these important aspects in our work processes and make them part of our employees' everyday activities.

The Governance, Risk & Compliance corporate unit established at Ströer SE & Co. KGaA is supported by a decentralized organization in all key areas of the business. This ensures that segment-specific risks and circumstances can be addressed appropriately.

Our overarching corporate GRC principles apply to all the Group's majority-held subsidiaries and create minimum organizational standards and a uniform framework for the implementation and monitoring of, and reporting on, the GRC system. They also provide a clear allocation and demarcation of responsibilities. Within the six areas brought together in the GRC system, there are separate policies, responsibilities, and structures in place enabling the function-specific requirements and risks to be addressed.

IT security

Data security and confidentiality are integral elements of our operating policy. The foremost priorities of IT security are ensuring that our customers and employees trust the Ströer Group to use their data in a responsible and legally compliant way and protecting the Company's assets against cyberattacks. This is even more important in an environment where cyber criminals are becoming increasingly professional and the risk to companies of cyberattacks is thus constantly growing.

Against this background, authenticity, integrity, confidentiality, and availability have been defined as the overarching objectives of IT protection. The emphasis is on protecting the Ströer Group's most valuable assets. In order to achieve these objectives and take account of developments in the field, since 2020 we have been strategically upgrading our existing IT security system and setting clear guidelines for the work across our entire organization. Policies have been defined for various application levels. The IT security policy and the IT security guidelines apply to all companies in the Ströer Group. They define in detail the minimum standards that the Ströer Group companies must achieve with their individual IT security organization and associated measures. In addition to these definitions, the policies are fleshed out as required for the individual companies in the Ströer Group. Furthermore, an employee guideline has been formulated for the proper and responsible use of IT systems and IT data.

In 2021, we continued to develop processes, responsibilities and organization in the area of IT security on this basis. This refers both to security measures in day-to-day operations, and to the roll-out of the groupwide cybersecurity program and the implementation of the associated policies by defined information security officers in all units.

Role profiles for risk management processes were established to take account of the requirements of the information security policies. There are now defined functions that assess the risks to a (software) asset from business and IT perspectives. Further cybersecurity training for all employees was also introduced in 2021. This complements an existing compulsory basic training module.

In terms of strengthening cybersecurity, it is also important to identify weaknesses in systems and processes and find solutions to remedy them. That is why, in 2021, we scanned for weaknesses across the Group and are now taking appropriate action. We also introduced and configured the information management system module (ISMS) from software provider OneTrust to give us a groupwide overview of all software assets. All future cyber-risk assessments can be carried out within this system.

In 2021, we finalized a process for reporting and responding swiftly to cyber incidents. The incident response processes are also being continuously developed and response teams formed that will focus on dealing with any incidents. This work is being carried out in close cooperation with the Governance, Risk & Compliance function.

Through these measures and others that we successfully implemented in 2021, we are creating a high level of security and establishing powerful and uniform structures for IT security.

Data protection

Data protection protects the right of our customers, business partners, and employees to privacy. Our aim is to respect this privacy and take appropriate measures to ensure the security of personal data and protect it against misuse.

The EU General Data Protection Regulation (GDPR) clearly states that appropriate technical and organizational measures must be implemented to ensure “a level of security appropriate to the risk” when processing personal data. No organization can process data in a compliant manner without having appropriate IT security processes. For that reason, close cooperation between the two areas is required. Such cooperation is practiced throughout our entire GRC organization.

Data protection compliance is directly dependent on the quality of the existing IT: data protection and data security go hand in hand. Enhancing IT systems in a manner that is data-protection compliant frequently also means increasing a company’s productivity, especially when the business is data-driven. We aim to harness these positive effects of collaborative data protection. We therefore act not because we are compelled to do so by law, but from our own professional interests.

One thing is clear: data protection is also – and especially – about protecting the data of our customers. A high level of protection and standardization in dealing with personal data is therefore critically important for the relationship with our customers. This applies equally to our employees and anyone else who entrusts us with their personal data.

In particular, Group Data Protection pushed ahead with the mapping of data-processing processes in a central data protection management system in 2021 as part of the growing data protection organization within the Ströer Group. This will enable us not just to comply with legal data protection requirements, but also to make our own processes as a whole considerably more reliable and efficient.

In 2021, nine justified complaints were received in connection with breaches of customers' privacy by Ströer Group companies in Germany; nine of these were from outside parties and none from regulatory authorities. In addition, one case of data theft or data loss that is notifiable under the GDPR was identified.

Compliance (particularly anti-corruption & bribery matters)

The Ströer Group and its various business units are exposed to numerous influences. They form the basis for our sustainable and profitable growth but also result in a wide range of risks. In a highly sales-oriented organization such as the Ströer Group, there are generally compliance risks too, such as in the area of corruption & bribery. The senior management team uses the Ströer compliance management system (CMS) established by the Board of Management to provide employees with ongoing support in familiarizing themselves with and adhering to the statutory provisions that are relevant to them.

The Ströer CMS includes prevention, detection, and action components. It has a clear focus on prevention and thus avoiding compliance violations occurring in the first place. This is primarily achieved by making employees aware of all compliance-relevant topics and empowering them to be able to deal with them.

Compliance is of great importance to the Board of Management of the general partner (Ströer Management SE, Düsseldorf) and the Supervisory Board of Ströer SE & Co. KGaA. Compliance involves adhering to legal requirements, obligations undertaken voluntarily, and internal company policies. In particular, this includes combating corruption & bribery.

Not only does corruption & bribery contravene all national and international legal frameworks, but Ströer also explicitly condemns such actions, both in relation to holders of public office and in dealings with business partners and customers.

To ensure compliance, Ströer has introduced groupwide rules of behavior in the form of the Ströer code of conduct that obliges the Group and its employees to comply with legal standards and internal policies.

Code of conduct

Responsible and legally compliant behavior is a core element of our business practice and our corporate philosophy. The code of conduct provides a binding framework across the Group for all employees for lawful and ethical conduct within the Company and in dealings with business partners and customers. It applies to the whole Ströer Group including the Board of Management.

The code of conduct is intended to help employees make the right decisions. It also includes information on the channels available to employees to report potential misconduct. The Ströer code of conduct is regularly reviewed, updated, and adapted to changes in the legal requirements. A training plan was implemented in conjunction with the most recent update of the code of conduct.

Compliance structure

The head of GRC is also appointed by the Board of Management of Ströer SE & Co. KGaA as Chief Compliance Officer. Under the decentralized structure, he is supported by additional compliance officers within the relevant areas of the business. The Chief Compliance Officer reports directly to the CFO of the Ströer Group on an ongoing basis and, at regular intervals, to the Audit Committee of the Supervisory Board.

He also manages the implementation of the Ströer compliance management system and is responsible for continually updating and adapting the system based on the results of the compliance risk analyses and other inputs. He monitors adherence to the compliance-relevant processes within the Ströer Group, and supports and advises employees and the Board of Management on compliance matters. The Chief Compliance Officer is also responsible for carrying out legal assessments of non-compliance reports received and coordinating the investigation into these.

The internal audit function supports the compliance function through the audits that it performs at the request of the Board of Management or Supervisory Board. These audits cover the effectiveness of the internal control system and risk management system. The findings of the audits are documented and related action plans drawn up. The audit documentation is regularly presented to the Chief Compliance Officer, the Board of Management, and the Supervisory Board of Ströer SE & Co. KGaA.

Compliance hotline

Every breach of applicable law can have serious consequences for both the Company and the employees. That is why Ströer encourages all employees and third parties to discuss their concerns openly and report any potential misconduct as soon as possible to the compliance organization. Our employees and external third parties such as business partners or customers can currently report compliance violations to a dedicated email address. This enables potential infringements of our code of conduct or other legal regulations to be reported in confidence. Incoming emails to this address are managed and treated in confidence by the Chief Compliance Officer. In this context, the Board of Management has imposed a special confidentiality obligation on the Chief Compliance Officer, including vis-à-vis the Board of Management itself. Potential misconduct can also be reported in person or by telephone. With the help of these reporting channels, we want to encourage all employees and third parties to report infringements without suffering any disadvantages, and thereby create an open culture of compliance within our organization.

In 2021, no incidences of corruption or bribery were identified within the Ströer Group.

The Company plans to develop and expand all elements of the whistleblowing system in 2022.

Compliance training concept

In early 2020, the Ströer Group launched and rolled out across the Group an online training course entitled 'Compliance – in general and in the Ströer Group' that is mandatory for all employees. This training course provides a general explanation of compliance matters and outlines the implementation of compliance within the Ströer Group. It is intended to make employees more aware of how the compliance system applies directly to their day-to-day work and, in particular, of the need to report compliance-relevant incidents to the compliance function.

So far, 4,082 employees in risk-relevant functions have successfully taken part in the training. Specific training modules on additional compliance topics for employees in high-risk areas are currently being planned.

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