

2020 COMPLIANCE REPORT

Compliance is a key issue that is very important to the Board of Management of the general partner of Ströer SE & Co. KGaA, Ströer Management SE, (the general partner) and to the Supervisory Board of Ströer SE & Co. KGaA.

In today's globalized world, shaped by increasingly complex and interlinked legal provisions, it is of utmost importance to the general partner and all employees of the Ströer Group that they are familiar with the current legal situation to ensure that they make the right decisions in compliance with the law. To this end, the general partner has issued a binding code of conduct for all German and foreign employees of the Ströer Group that provides reliable guidelines for day-to-day operations that are understandable to all employees (the code of conduct). The code of conduct summarizes internal policies and the most important laws of relevance to the Ströer Group's business. It also defines how all Ströer employees should conduct themselves in their dealings with business partners, public officials, colleagues, and society at large. The code of conduct is based on international standards and is reviewed regularly and updated where necessary by the compliance organization.

The senior management team uses the Ströer compliance system 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 primary objective of the Ströer compliance system is to prevent violations from happening 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. To this end, all employees receive training on various compliance-related issues. The compliance system places particular emphasis on anti-corruption, conflicts of interest, capital market law, data protection law, and antitrust law. Another objective of the compliance program is to promptly identify and detect any compliance breaches and to respond to them appropriately. The Ströer Group is committed to ensuring that the highest possible ethical and legal standards are upheld in relations with the limited-liability shareholders in a partnership limited by shares (Kommanditaktionäre, 'limited shareholders') of Ströer SE & Co. KGaA, employees, business partners, competitors, and society as a whole.

The Ströer Group's compliance organization is managed by the legal department. The general partner appoints a Chief Compliance Officer, who reports directly to the Board of Management of the general partner and the chairman of the Supervisory Board, oversees the groupwide implementation of the compliance program, and continuously updates and adapts the compliance system. The latter aspect focuses in particular on changes to legislation in areas relevant to the Ströer Group. The Chief Compliance Officer is supported by country-specific compliance officers who are also the point of contact for all employees. We attach particular importance to our employees being able to actively obtain advice early on if they have any doubts. Employees can seek assistance not only from their line managers but also from the compliance officers. All employees and third parties can also confidentially report any indications of possible breaches of the law in our Company by sending an email to compliance@stroeer.de. Only the Chief Compliance Officer and the compliance officer for Germany have access to this email address. The general partner requires both officers to observe strict confidentiality.

All suspected compliance breaches are logged and reviewed on the basis of uniform criteria. If a reported breach is particularly serious, an incident team is formed that may call in support from an external service provider. Where a compliance breach is found to have occurred, Ströer SE & Co. KGaA takes extensive countermeasures including, but not limited to, appropriate disciplinary action and preventive measures for the future.

In 2020, the compliance organization received five specific reports of compliance breaches that it then followed up. None of them were material. In two of the five cases, applicable law and/or internal policies were found to have been breached. These were sanctioned with disciplinary action, including dismissals. In the areas affected by the breaches, existing processes have been optimized and new ones added in order to prevent similar breaches in the future.