

Report on the LkSG (Supply Chain Due Diligence Act)

Reporting period from 01.01.2023 to 31.12.2023

Name of the organization: freenet AG

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A. Strategy & anchoring

A1. Monitoring of risk management & responsibility of the Executive Board

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

Alexander Borgwardt, General Counsel, Chief Compliance Officer, Human Rights Officer

A. Strategy & anchoring

A1. Monitoring of risk management & responsibility of the Executive Board

Has the management established a reporting process that ensures that it is regularly - at least once a year - informed about the work of the person responsible for monitoring risk management?

It is confirmed that the management has established a reporting process that ensures that it is informed regularly - at least once a year - about the work of the person responsible for monitoring risk management within the meaning of Section 4 (3) LkSG.

- Confirmed

Describe the process that ensures reporting to management at least once a year or regularly with regard to risk management.

The Human Rights Officer reports regularly to the corresponding committees of freenet AG on the current risk management situation with respect to LkSG-specific risks at freenet AG and in the included business operations of the companies over which a determining influence is exercised. The Human Rights Officer reports in particular on the measures implemented to reduce risks and their effectiveness and to remedy any violations. He reports on this at least once a year at a meeting of the freenet AG Executive Board. LkSG-specific aspects are also explained in the monthly meetings of the ESG Committee.

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Is there a policy statement that has been prepared or updated on the basis of the risk analysis carried out during the reporting period?

The policy statement has been uploaded

https://www.freenet.ag/binaries/_ts_1700061551377/content/assets/freenetgroup/pdf/einkauf/231115_lksg_grundsatzzerklarung.pdf

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Has the policy statement for the reporting period been communicated?

It is confirmed that the policy statement has been communicated to employees, the works council if applicable, the public and the direct suppliers where a risk was identified in the risk analysis.

- Confirmed

Please describe how the policy statement was communicated to the relevant target groups.

The policy statement has been published on the freenet AG homepage (<https://www.freenet.ag/unternehmen/verantwortung/index.html>).

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

What elements does the policy statement contain?

- Establishment of a risk management
- Annual risk analysis
- Establishment of preventive measures in the company's own business area, with direct suppliers and, if applicable, indirect suppliers and their effectiveness review
- Corrective measures in own business area, at direct suppliers and, if applicable, indirect suppliers and their effectiveness review
- Provision of a complaints procedure in the company's own business area, with suppliers and review of its effectiveness
- Documentation and reporting obligations
- Description of human rights-related and environmental expectations of own employees and suppliers

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Description of possible updates during the reporting period and the reasons for them.

No update was carried out as the risk situation remained unchanged in the reporting period.

A. Strategy & Anchoring

A3. Anchoring the human rights strategy within your own organization

In which relevant departments/business processes was the anchoring of the human rights strategy ensured during the reporting period?

- Personnel/HR
- Environmental management
- Occupational safety & occupational health management
- Communication / Corporate Affairs
- Purchasing/Procurement
- CSR/Sustainability
- Legal/Compliance
- Other: ICS/risk management

Describe how responsibility for implementing the strategy is distributed within the various specialist departments/business processes.

The implementation of the LkSG strategy is organized decentrally. Each specialist department ensures that risks relevant to the LkSG are avoided in its area of responsibility.

If specific risks or violations of protected legal positions are identified in a department in the future, this is reported to the Human Rights Officer, who then implements the preventive or remedial measures in consultation with the department.

Describe how the strategy is integrated into operational processes and procedures.

At freenet, the two areas of procurement and personnel management are the main pillars of the implementation of the LkSG-related due diligence obligations.

The HR department is responsible for implementing the legal requirements in connection with its own employees. All freenet companies covered by this report that employ staff are based in the Federal Republic of Germany or, to a lesser extent, in Sweden, so that the legal requirements at least meet or exceed the requirements of the LkSG. If individual employees do not work in these countries, the HR department takes appropriate measures to ensure that the relevant standards are complied with.

In the area of procurement, the purchasing departments have been provided with frameworks via the Declaration of Principles, the Purchasing Guidelines, the Supplier Code of Conduct and the General Terms and Conditions of Purchase, which promote and guide responsible implementation in accordance with freenet AG's canon of values. The Supplier Code of Conduct or corresponding regulations with a comparable level of protection are agreed with all business partners. This is intended to emphasize the value that freenet places on sustainability in the supply chain to

suppliers and improve the corresponding compliance.

By expanding the complaints management system to include the target groups relevant to the LkSG, freenet should be able to identify risks and violations at an early stage and respond to them. The procedural rules of the whistleblower system therefore stipulate that the Whistleblower Committee informs the Human Rights Officer if a report relates to a compliance violation in the supply chain.

Describe which resources & expertise are provided for implementation.

The freenet AG Executive Board provides comprehensive support for the implementation of the LkSG. With the appointment of the General Counsel / Chief Compliance Officer as Human Rights Officer, an experienced and competent manager has been entrusted with the organization of the implementation of due diligence obligations. As the Group's Head of Legal / M&A / Compliance, he has many years of project experience in the implementation of complex legal regulations throughout the entire organization.

The Human Rights Officer is supported directly by a Compliance Manager, who takes on the administrative organizational tasks.

As explained above, the operational implementation of the human rights strategy at freenet is organized decentrally. All relevant specialist departments therefore provide human and financial resources in order to achieve the goals formulated in the declaration of principles. The Head of Human Resources & ESG and her ESG team are responsible for the holistic view of sustainability throughout the entire value chain and therefore also for the supply chains.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Was a regular (annual) risk analysis carried out during the reporting period to identify, weight and prioritize human rights and environmental risks?

- Yes, for own business area
- Yes, for direct suppliers

Describe the period in which the annual risk analysis was carried out.

The regular risk analysis began in January 2023 by sending detailed instructions on how to carry out an abstract and, if necessary, a subsequent concrete risk analysis by the procurement departments of freenet AG and the companies over which it has a decisive influence. Against the background of the ongoing risk analysis, a regular exchange took place with the procurement-relevant departments of the Group, in particular with the Head of Indirect Purchasing at freenet AG and the Head of Purchasing of the Group companies of the MEDIA BROADCAST Group, in the months from January to August 2023.

The focus here was on implementing processes to identify and document LkSG-specific risks for new and existing suppliers, in particular by incorporating existing preventive measures in accordance with the freenet Supplier Code of Conduct. In a newly established central LkSG-specific risk identification process, all relevant suppliers were contacted from August 2023 with a self-evaluation questionnaire. Suppliers who had not provided feedback were reminded to return the questionnaires later in the year. At the end of the reporting period, all responses to the questionnaires sent out had been received.

Describe the risk analysis procedure.

freenet AG and the companies over which it exercises a determining influence procure predominantly in the Federal Republic of Germany, the EU or other countries with comparable legal standards. As part of the abstract risk analysis, comparable legal standards were assumed if the supplier is based in an OECD member state. Risks for suppliers from non-OECD countries exist primarily if they operate in high-risk sectors. Research Report 543 "Respect for human rights along global value chains", p. 239 ff. (overview of 29 sectors with human rights risks), which was published by the BMAS in July 2020, was used as the basis for determining supply chain risks. According to this, an abstract risk was identified if a supplier is not based in an OECD member state and goods were sourced from a risk sector. This analysis was carried out for all creditors with which the companies included in the report generated a turnover in 2022. For the new suppliers added in 2023, this risk analysis was

carried out as part of supplier due diligence.

The suppliers associated with an abstract risk were then individually assessed by the responsible procurement department to determine whether they were aware of any specific risks or even violations of protected legal positions.

As a supplementary measure to identify risks or violations of protected legal positions, suppliers

of all companies included were contacted and asked about their risk disposition with regard to protected legal positions. In order to avoid placing an unnecessary burden on small suppliers in particular, only suppliers with a turnover of at least EUR 50,000 with a company in 2022 and at least EUR 1,000 otherwise were contacted as part of this measure if they are based in the EU. In addition, public bodies, associations, franchisees, specialist retail partners and landlords were not included in this measure due to risk considerations. Franchisees and specialist retail partners are generally based in the Federal Republic of Germany and are in continuous contact with our sales organizations. These suppliers are not known to have violated the protected legal positions. Landlords are either wealthy private individuals or real estate management companies. The corresponding risk disposition for human rights or environmental violations is also considered to be very low.

Finally, since January 1, 2023, freenet AG has set up a complaints management system for the public, through which suppliers or other persons can provide anonymous information on supply chain risks. Whistleblowers can make submissions in writing, by email or by telephone. The system was accepted, but none of the reports received were related to supply chain risks, so they were forwarded to the general whistleblower committee for further processing.

No specific risks could be assigned to any company as part of the risk analysis.

However, it should be noted that freenet has a direct business relationship with around twenty Chinese companies. In principle, there is no freedom of association in the People's Republic of China. However, this circumstance cannot be attributed to any individual company. At the same time, the German government has repeatedly made it clear that China should remain an important trading partner for Germany. For freenet, it should be noted that no questionnaire from the Chinese companies confirms that the freedom of association was disregarded in this specific case. Against this background, freedom of association was not taken into account in the risk assessment of Chinese suppliers.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Were occasion-related risk analyses also carried out during the reporting period?

- Yes, due to a significant change in the risk situation, for example as a result of new products/projects/opening up new markets

Describe the specific occasions.

As eXaring AG wanted to establish a new business relationship with a Chinese company in 2023, a risk analysis was carried out in advance.

Describe the findings of the analysis with regard to a significantly changed and/or expanded risk situation.

No LkSG-related risks were identified at the supplier. Any restrictions on freedom of association due to Chinese legislation were not taken into account in the assessment.

Describe the extent to which findings from the processing of indications/complaints have been incorporated.

There were no indications or complaints.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) in your own business area?

- None

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) for direct suppliers?

- Disregard for freedom of association - freedom of association & right to collective bargaining
- Other prohibitions: No specific risks were identified at individual suppliers. No relevant risks to protected legal interests were identified during on-site visits to suppliers either. Nevertheless, it can be assumed that there is no freedom of association due to the legal situation in the People's Republic of China, as the All-China Federation of Trade Unions has a legal monopoly. China has also not ratified any international agreements on freedom of association.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) for indirect suppliers?

- None

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Were the risks identified in the reporting period weighted and, if applicable, prioritized and, if so, on the basis of which appropriateness criteria?

- Yes, on the basis of own influence
- Yes, based on the nature and scope of own business activities
- Yes, based on the type of causal contribution

Describe in more detail how the weighting and prioritization process was carried out and what considerations were made.

The restriction of freedom of association in the People's Republic of China is not a circumstance that represents a controllable risk for freenet, as it is a legal requirement in the supplier country. The German government does not advise against doing business with China and has not implemented any sanctions, so that it can be assumed that the restriction of freedom of association in China is not to be considered as very material, contrary to Section 7 (3) No. 1 LkSG. It is therefore not necessary to terminate the business relationship.

The weighting and prioritization was also based on the fact that freenet has no influence on the direct causer of this risk pursuant to Section 3 (2) No. 2 LkSG, as this is the Chinese state.

In addition, freenet's contribution to causation pursuant to Section 3 (2) No. 4 LkSG is practically non-existent, as it is not a risk that can be linked in any way to the specific contractual conditions with the supplier.

B. Risk analysis and preventive measures

B2. Prevention measures in own business area

Which risks were prioritized in your own business area during the reporting period?

- None

If no risks have been selected, give reasons for your answer.

Due to the established processes and control measures, there are no significant concrete risks in freenet's own business area that are controllable by freenet.

B. Risk analysis and preventive measures

B2. Prevention measures in own business area

What preventive measures were implemented for the reporting period to prevent and minimize the priority risks in your own business area?

- None

If no prevention measures were selected, give reasons for your answer.

Due to the established processes and control measures, there are no significant concrete risks in freenet's own business area that are controllable by freenet.

B. Risk analysis and preventive measures

B3. Preventive measures for direct suppliers

Which risks were prioritized for direct suppliers during the reporting period?

- None

If no risks have been selected, give reasons for your answer.

freenet did not identify any controllable risks with direct suppliers during the initial risk analysis.

B. Risk analysis and preventive measures

B3. Preventive measures for direct suppliers

What preventive measures were implemented for the reporting period to prevent and minimize the priority risks at direct suppliers?

- Development and implementation of suitable procurement strategies and purchasing practices
- Integration of expectations in supplier selection
- Obtain contractual assurance for compliance and implementation of expectations along the supply chain

Other categories:

selected:

- Integration of expectations in supplier selection
- Obtain contractual assurance for compliance and implementation of expectations along the supply chain

Describe to what extent the measures to prevent and minimize the priority risks are appropriate and effective.

Due to the established processes and control measures, there are no significant concrete risks in freenet's own business area that are controllable by freenet.

Category: Procurement strategy & purchasing practices

selected:

- Development and implementation of suitable procurement strategies and purchasing practices

Describe the measures implemented and the extent to which the definition of delivery times, purchase prices or the duration of contractual relationships have been adjusted.

freenet's purchasing guidelines have expressly included ethical, social and ecological aspects in procurement decisions since 2017. This was further emphasized and specified with the publication of the declaration of principles in 2023.

All of the freenet Group's purchasing units were involved in the implementation of the LkSG through the risk analysis and thus sensitized once again to the existing risks. Furthermore, these abstract core risks have also been incorporated into the General Terms and Conditions of Purchase, which also include the Supplier Code of Conduct, which has been in place since 2018, in the contractual relationships with the freenet companies' suppliers. This Supplier Code of Conduct is regularly updated and adapted to the risk environment.

Furthermore, the regular risk analysis began in January 2023 by sending detailed instructions on how to carry out an abstract and, if necessary, a subsequent concrete risk analysis by the procurement departments of freenet AG and the companies to which these departments

exerts a determining influence. Against the backdrop of the ongoing risk analysis, a regular exchange took place between January and August 2023 with the Group's procurement-relevant departments, in particular with the Head of Indirect Purchasing at freenet AG and the Head of Purchasing at the MEDIA BROADCAST Group companies.

The focus here was on implementing processes to identify and document LkSG-specific risks for new and existing suppliers, in particular by incorporating existing preventive measures in accordance with the freenet Supplier Code of Conduct. In a newly established central LkSG-specific risk identification process, all relevant suppliers were contacted from August 2023 with a self-evaluation questionnaire. Suppliers who had not provided feedback were reminded to return the questionnaires later in the year. At the end of the reporting period, all responses to the questionnaires sent out had been received.

Describe how adjustments to your own procurement strategy and purchasing practices will help to prevent and minimize the priority risks.

Due to the established processes and control measures, there are no significant concrete risks in freenet's own business area that are controllable by freenet.

B. Risk analysis and preventive measures

B4. Preventive measures for indirect suppliers

Which risks were prioritized based on the event-related risk analysis for indirect suppliers?

- None

If no risks have been selected, give reasons for your answer.

freenet did not identify any controllable risks with indirect suppliers in the initial risk analysis.

B. Risk analysis and preventive measures

B4. Preventive measures for indirect suppliers

What preventive measures were implemented for the reporting period to prevent and minimize priority risks at indirect suppliers?

- None

If no prevention measures were selected, give reasons for your answer.

freenet did not identify any controllable risks with indirect suppliers during the initial risk analysis.

B. Risk analysis and preventive measures

B5. Communication of the results

Were the results of the risk analysis(es) for the reporting period communicated internally to relevant decision-makers?

It is confirmed that the results of the risk analysis(es) for the reporting period were communicated internally to the relevant decision-makers, such as the Executive Board, the management or the purchasing department, in accordance with Section 5 (3) LkSG.

- Confirmed

B. Risk analysis and preventive measures

B6. Changes to the risk disposition

What changes have occurred with regard to priority risks compared to the previous reporting period?

Due to the established processes and control measures, there are no significant concrete risks in freenet's own business area that are controllable by freenet.

C. Identification of violations and corrective measures

C1. Identification of violations and corrective measures in own business area

Were any breaches identified in your own business area during the reporting period?

- No

Describe which procedures can be used to detect violations in your own business area.

freenet ensures that violations are identified in its own business area by means of corresponding processes at various levels. First of all, freenet has group-wide (optionally anonymous) whistleblower systems through which both internal and external persons can report grievances or the violation of LkSG-specific legal interests.

There is also a company partner management system linked to the HR department as a group-wide point of contact for all works councils and therefore for employee representatives. Violations of protected legal positions can be communicated directly in this way and appropriate remedial measures can then be taken.

In particular, HR Management also operates automated systems for the comprehensive data-based detection of violations of the legal positions protected under the LkSG.

By integrating the LkSG-relevant processes into the company-wide ICS, any breaches in the company's own business area can be identified.

C. Identification of violations and corrective measures

C2. Identification of violations and corrective actions at direct suppliers

Were any violations identified at direct suppliers during the reporting period?

- No

Describe the procedures that can be used to detect violations at direct suppliers.

Violations at direct suppliers can be identified through the regular risk analysis. The regular risk analysis includes the sending of detailed instructions for the performance of an abstract and, if necessary, a subsequent concrete risk analysis by the procurement departments of freenet AG and the companies over which it exerts a determining influence. In this respect, a regular exchange takes place with the procurement-relevant departments of the group, in particular with the Head of Indirect Purchasing at freenet AG and the Head of Purchasing of the group companies of the MEDIA BROADCAST group. The focus here was on the implementation of processes to identify and document LkSG-specific risks for new and existing suppliers, in particular including existing preventive measures in accordance with the freenet Supplier Code of Conduct. In a central LkSG-specific risk identification process, all relevant suppliers are contacted with a self-evaluation questionnaire. Suppliers who have not provided feedback are subsequently reminded to return the questionnaires until all feedback has been received.

C. Identification of violations and corrective measures

C3. Identification of violations and corrective actions for indirect suppliers

Were any violations identified at indirect suppliers during the reporting period?

- No

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

In what form was a complaints procedure offered for the reporting period?

- In-house complaints procedure

Describe the company's own process and/or the process in which your company participates.

freenet has implemented its own complaints procedure. The whistleblower system gives people the opportunity to contact the freenet Group's whistleblower committee by e-mail or telephone.

The publicly accessible freenet AG website

<https://www.freenet.ag/unternehmen/hinweisgeber/index.html> explains to whistleblowers that they have the opportunity to report information or complaints to freenet anonymously or by disclosing their identity. The associated process is documented in the rules of procedure published at the same location.

Information reported via the system is sent directly to the Whistleblower Committee. This committee consists of the Chief Compliance Officer and the Head of Group Audit, Risk and Control as well as any designated representatives. The committee evaluates reports and coordinates any necessary further steps and communication with the whistleblower. The results of the whistleblower system are subsequently incorporated into LkSG risk management.

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

Which potentially involved parties have access to the complaints procedure?

- Own employees
- Communities in the vicinity of own locations
- Employees at suppliers
- External stakeholders such as NGOs, trade unions, etc.

How is access to the complaints procedure ensured for the various groups of potentially involved parties?

- Publicly accessible rules of procedure in text form
- Information on accessibility
- Information on responsibility
- Information on the process
- All information is clear and understandable
- All information is publicly accessible

Publicly accessible rules of procedure in text form

Optional: Describe.

-

Information on accessibility

Optional: Describe.

-

Information on responsibility

Optional: Describe.

-

Information about the process

Optional: Describe.

-

All information is clear and understandable

Optional: Describe.

-

All information is publicly available

Optional: Describe.

-

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

Were the rules of procedure for the reporting period publicly available?

File has been uploaded

The Rules of Procedure:

https://www.freenet.ag/binaries/_ts_1672582356360/content/assets/freenetgroup/pdf/hinweisgeber/20221219-freenet-hinweisgebersystem-verfahrensordnung.pdf

D. Complaints procedure

D2. Requirements for the complaints procedure

Indicate the person(s) responsible for the procedure and their function(s).

Mr. Alexander Borgwardt
Human Rights Officer, General Counsel, Chief Compliance Officer

Mr. Karsten Sepetauz
Head of Group Audit, Risk and Control

It is confirmed that the criteria contained in Section 8 (3) LkSG are met for the responsible parties, i.e. that they offer the guarantee of impartial action, are independent and not bound by instructions and are obliged to maintain confidentiality

- Confirmed

D. Complaints procedure

D2. Requirements for the complaints procedure

It is confirmed that precautions were taken during the reporting period to protect those potentially involved from being disadvantaged or penalized as a result of a complaint.

- Confirmed

Describe what precautions have been taken, in particular how the complaints procedure ensures the confidentiality of the identity of whistleblowers.

Access to the complaints procedure is only possible for a very restricted group of people. These employees have a very high degree of integrity and are regularly freenet AG's confidants. Furthermore, the file management of information is only carried out digitally with adequate role concepts and access restrictions, so that accidental discovery by third parties is made difficult to a high degree.

Describe what precautions have been taken, in particular what other measures are in place to protect whistleblowers.

freenet attaches great importance to protecting the identity of whistleblowers and will not disclose their identity to third parties. This is already supported by the fact that it is possible for complainants to provide information anonymously. According to freenet's rules of procedure, a sanction due to the submission of a report made in good faith may under no circumstances lead to discrimination.

D. Complaints procedure

D3. Implementation of the complaints procedure

Did you receive any information about the complaints procedure during the reporting period?

- No

E. Review of risk management

Is there a process in place to review the appropriateness and effectiveness of risk management across the board?

In which of the following areas of risk management is the appropriateness and effectiveness checked?

- Resources & Expertise
- Risk analysis and prioritization process
- Preventive measures
- Remedial measures
- Complaints procedure
- Documentation

Describe how this audit is carried out for the respective area and what results it has led to, particularly with regard to the prioritized risks.

The LkSG-related risk management is part of the Audit Universe of the freenet Group Internal Audit department and is therefore subject to an ongoing review process.

The audit of the respective area incorporates the findings of previous years with regard to the risk areas of the LkSG.

If violations are identified at a supplier, it is planned to specifically review risk management with regard to comparable suppliers and, if necessary, to implement measures to improve the detection of comparable violations at other suppliers.

If relevant risks are identified at a supplier LkSG, it is planned to specifically review risk management with regard to comparable suppliers and, if necessary, to implement measures to improve the detection of comparable risks at other suppliers. In particular, it is planned to include information received via the complaints procedure in the review of the risk analysis procedure. As a result of newly identified violations or risks at suppliers, the policy statement is also to be reviewed to determine whether it has taken sufficient account of the violations or risks or needs to be adapted.

Finally, it is envisaged that the review of risk management will also include information from the competent supervisory authority if this indicates any weaknesses.

E. Review of risk management

Are there processes or measures in place to ensure that the interests of your employees, the employees within your supply chains and those who may otherwise be directly affected in a protected legal position by the economic activities of your company or by the economic activities of a company in your supply chains are adequately taken into account when establishing and implementing risk management?

In which areas of risk management do processes or measures exist to take into account the interests of those potentially affected?

- Resources & Expertise
- Preventive measures
- Complaints procedure

Describe the processes and measures for the respective area of risk management.

Resources & expertise: All of freenet's procurement units were involved in the supplier risk analysis. They have regular contact with their suppliers and are familiar with their organization and challenges, so that department-specific aspects are taken into account.

Preventive measures: International standards are used as a basis for the creation and revision of prevention measures. In addition, the specific execution is coordinated with the two most important purchasing departments, which are in direct contact with the majority of suppliers.

Complaints procedure: The interests of the affected parties were taken into account by the Whistleblower Committee when setting up and structuring the complaints procedure. The members of the Whistleblower Committee have experience from various industries and, due to their position at freenet, are also in regular contact with associations, company and interest representatives from business and politics.