



Policy Statement

on the protection of human rights

The protection of human rights and natural resources along the supply chain is an important concern for freenet. freenet AG and its affiliated companies act in accordance with applicable laws and are committed to compliance with internationally recognized human rights and environmental standards. Due to the outstanding role of the supply chain for its business model, freenet also places corresponding requirements on its suppliers, service providers and other business partners.

Standards

freenet's strategy for respecting human rights and protecting natural resources is based on the following national and international standards. These principles apply both to the company's own employees and along the supply chains.

- United Nations Universal Declaration of Human Rights
- The assessments of the United Nations Global Compact
- United Nations Guiding Principles on Business and Human Rights
- International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and its Follow-up
- Combating human rights and environmental risks in accordance with the Supply Chain Due Diligence Act of the Federal Republic of Germany (*Lieferkettensorgfaltspflichtengesetz*).

Risk analysis and measures

In 2022, freenet began to systematically examine its suppliers for human rights and environmental risks, further developing its previous supplier due diligence. In the future, this risk analysis will be carried out annually and on an ad hoc basis. If risks are detected, freenet will weight and prioritize them and take appropriate measures to counter them.

freenet is operationally active only in Germany and, with very few exceptions, procures goods and services from German and European companies whose human rights and environmental behaviour does not raise any significant concerns.

The supply chains associated with freenet, both for end devices and services, particularly in the telecommunications sector, are complex and are only comprehensible to freenet to a very limited extent. In addition, freenet's suppliers are often companies with a high level of market power. Therefore, freenet's ability to influence these business partners is practically limited.

Against the background of the goods and services procured by freenet, freenet focuses in particular on the following human rights and environmental risks in its risk analysis:

- Child and forced labour
- Inadequate occupational health and safety
- Denial of freedom of association
- Unlawful unequal treatment
- Withholding of appropriate wages
- Environmental pollution with harmful effects on livelihoods

In order to enforce the standards, freenet works with its suppliers to improve the protection of human rights and natural resources through the contractual integration of its Supplier Code of Conduct and individual risk-related contractual clauses. freenet's business partners are encouraged to commit their suppliers to comply with the relevant national and international standards.

If freenet identifies material violations of human rights or environmental regulations protected by the aforementioned standards in its value chain, freenet will work with its suppliers to remedy them or suspend or terminate the business relationship.

Complaints procedure

freenet maintains a complaints system that is open to everyone to report information of violations of protected legal positions. Whistleblowers have the opportunity to provide information without disclosing their identity. freenet is committed to protecting whistleblowers from reprisals as a result of the report.

Organization

The Management Board of freenet AG is responsible for compliance with the due diligence obligations to enforce the standards. The Human Rights Officer organizes the implementation of due diligence obligations at freenet AG and its affiliated companies and reports on this to the Management Board at least annually.

Reporting

freenet reports annually on the fulfilment of due diligence obligations in the previous financial year and publishes this report on the website www.freenet.ag.

Büdelndorf, in 2023

freenet AG

The Management Board