

Corporate Social Responsibility Report 2023

Contents

3 About this report

5 Our contribution to sustainable development.

6 CSR strategy of Tele Columbus AG

- 6 Key topics
- 7 Guiding principles
- 7 Organisation, management, incentive systems
- 9 ESG Strategy 2030
- 9 Non-financial risks
- 10 Consequences of climate change
- 10 Procurement risks
- 10 Sustainability ranking
- 11 Involvement of stakeholder groups

13 Customers and products

- 13 Digital inclusion
- 14 Data protection
- 14 Cybersecurity
- 15 Customer satisfaction and service quality
- 15 Products and innovation
- 16 Communication and transparency

19 Resources.

- 20 Electricity consumption
- 22 Mobility
- 23 Hardware circularity
- 24 Material purchasing
- 24 Logistics and postal communication
- 24 Product usage
- 25 Water and wastewater
- 26 Carbon footprint

27 Employees

- 27 Tele Columbus as an employer
- 27 Employer attractiveness
- 28 HR development
- 29 Occupational health and safety
- 30 Collaboration with employee representatives
- 31 Diversity and equal opportunities

34 Compliance

- 35 Compliance cases 2023
- 35 Notes on political influence
- 35 Fair supply chains

37 Facts and figures

45 References to GRI

46 Fehler! Kein gültiges Resultat für Tabelle.

About this report

Tele Columbus AG, which has its registered office in Berlin, publishes an annual CSR report in order to document the progress of the companies operating under the umbrella of Tele Columbus AG in implementing their sustainability strategy. The investments made by Tele Columbus AG in fibre-based network expansion are aimed at meeting future demand for bandwidth and safeguarding media diversity. In our sustainability strategy, we have set ourselves clearly defined goals in all relevant areas to help shape this future development in a sustainable and socially responsible manner. Our aim with this report is to create the necessary transparency to serve as a basis for our interactions with our key stakeholder groups.

Since its complete delisting from the sub-segment of the regulated market with additional post-admission obligations (Prime Standard) in 2021 and the relisting of Euronext Dublin bonds on The International Stock Exchange, Guernsey, Tele Columbus AG is no longer listed on the stock exchange or publicly traded within the meaning of Section 264d of the German Commercial Code [Handelsgesetzbuch – HGB]. Accordingly, it is no longer required to publish a sustainability report or non-financial Group report. This sustainability report is therefore published on a voluntary basis [GRI 2-24].

Tele Columbus AG has prepared this report in accordance with the GRI Standards for the period from 1 January 2023 to 31 December 2023 in order to present the sustainability strategy pursued by Tele Columbus AG along its value chain.

Reporting is based on a materiality analysis, which was last carried out in December 2023 and already reflects double materiality according to CSRD.

Information on topics categorised as key can be found in section 2.1.

The figures and information in this report describe the situation as at 31 December 2023 unless otherwise stated and include all Group companies that employ staff, as well as majority shareholdings in which Tele Columbus holds a controlling interest. The most important companies operating as part of Tele Columbus AG are Tele Columbus Betriebs GmbH, Tele Columbus Vertriebs GmbH, HL komm Telekommunikations GmbH, Kabelfernsehen München ServiCenter GmbH, Tele Columbus Multimedia GmbH and RFC Radio-, Fernseh- und Computertechnik GmbH. For a full list of all participations in other companies, please refer to the information on the scope of consolidation in the management report. The ESG strategy is monitored using KPIs performance indicators, which in turn makes it easier to manage the process to successfully achieve desired targets. The contents of the report are not audited externally by an independent auditor. The report is reviewed by the specialist departments in-house and approved by the Management Board. The information, calculations and document references are also checked by external auditors for participation in the GRESB sustainability

ranking. [GRI 2-1, GRI 2-3, GRI 2-4, GRI 2-2, GRI 2-5, GRI 2-14]

Business model and vertical integration

Tele Columbus regards itself as a network operator that provides telecommunications services for residential and business customers. Together with its housing association partners, the Tele Columbus Group offers tailored models of cooperation and state-of-the-art services such as telemetric and tenant portals. Under the PÿUR brand, the company offers high-speed Internet, telephone and more than 200 TV programmes as well as the entertainment platform PÿUR TV HD – the perfect combination of TV and on-demand offerings with numerous advantages over conventional IPTV solutions. On the basis of open networks, the Tele Columbus Group implements customized cooperation models together with the housing industry and municipalities for high-performance supply with gigabit bandwidths via optical fibre to the home (FTTH). In the business customer segment, carrier services and corporate solutions are also provided using the company's own fibre optic network and its own data centres, which meet high the security requirements expected of data centres. As a full-service partner for local authorities and regional utilities, the company is a key driver of fibre optic-based infrastructure and broadband expansion in Germany. We offer the full range of services, from planning and construction and passive and active network operation all the way through to product marketing and customer service. No changes have been made to the business model in comparison with the previous year. Further

details on our business model can be found in the Group management report. [GRI 2-1, GRI 2-6, GRI 203-1]

Grants received as part of the broadband expansion programme are disclosed in the annual financial statements [GRI 201-4].

The same applies to the subject matters of tax strategy, tax governance and control framework. [GRI 207-1, GRI 207-2]

There is no country-specific disclosure because business activities are limited to Germany. [GRI 207-4]

Key business data as at 31 December 2023

	2023
Gross asset value (GAV) in millions	2,006.12
Revenue in millions	452.1

[GRI 201-1]

Our contribution to sustainable development.



Flexible, mobile working, annual employee satisfaction surveys, company medical services and weekly sports activities ensure the health and well-being of the workforce.



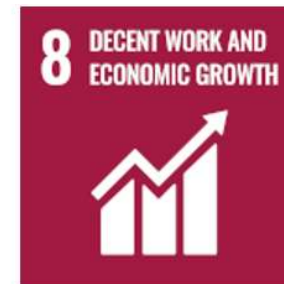
Our networks enable participation in educational possibilities. We offer our employees adequate opportunities for further trainings.



A diversity officer, workshops on inclusion and diversity and our goal of strengthening women in leadership positions set the course for gender equality.



We rely on green electricity and energy savings, use photovoltaics and are building up an electric vehicle fleet.



The freedom of association and assembly of our employees applies without restriction. All occupational health and safety rights are guaranteed. Compliance with minimum wages is also monitored at our service providers.



With a future-proof and resilient fiber optic infrastructure, we create the foundation for progress and innovation.



Tele Columbus is a signatory of the Diversity Charta. We have almost 40 nationalities working under one roof. We ensure a non-discriminatory working environment for all employees.



Our networks cover cities and rural areas, helping to ensure comparable living conditions. Our networks are also the key to optimising the management of sustainable projects.



Recycling instead of throwing away. At the end of the contract, the hardware is refurbished and put back into circulation.



The use of renewable energies, the economical use of water and data centres that are orientated towards the guidelines of the Sustainable Digital Infrastructure Alliance are climate protection in action.



Reducing paper use, separating and disposing of waste properly, optimising energy use and supporting nature conservation projects help to preserve habitats on land.



Tele Columbus pursues a zero-compliance strategy to prevent money laundering, corruption and illegal financial matters.

CSR strategy of Tele Columbus AG

Tele Columbus AG acknowledges its responsibility for the consequences of business activities across the entire value chain. Our employees take into account the impacts of their decisions on social and environmental aspects of sustainability. In the context of our corporate responsibility, the effects of our business operations should be reconciled with the expectations and requirements of our customers, partners and investors. We have summarised the main requirements for sustainable orientation of our business activities in our CSR mission statement.

The concerns of our stakeholders have been identified through a materiality analysis and are regularly reviewed as part of an ongoing dialogue. In 2023, a new materiality analysis was carried out in conjunction with an external consulting firm.

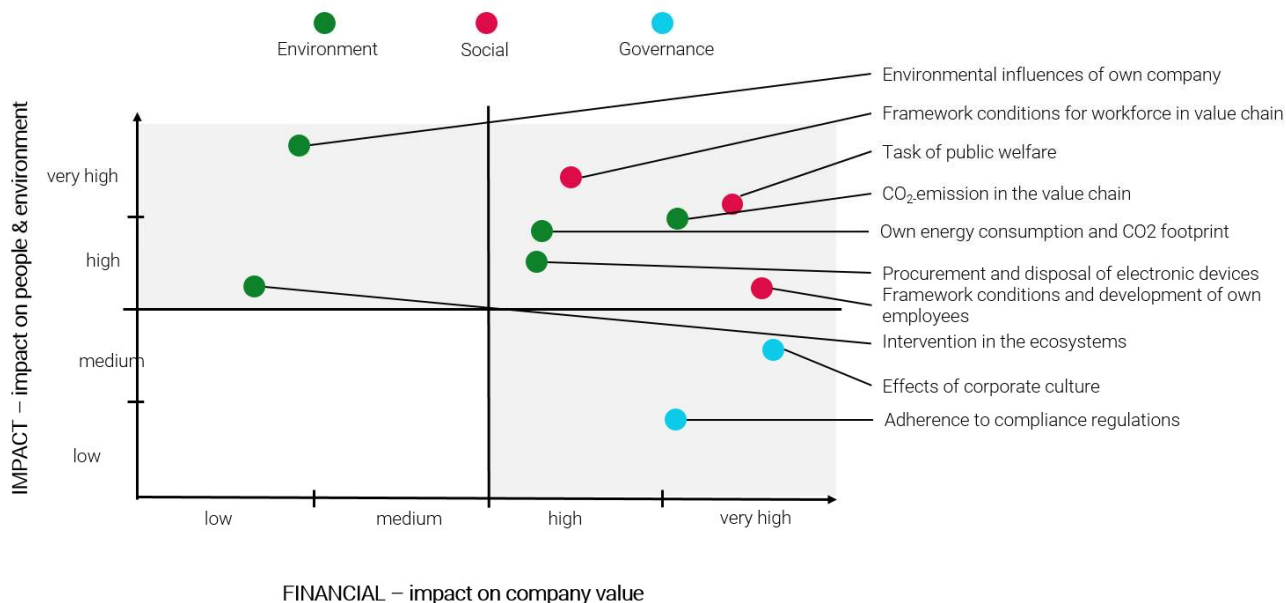
Taking into account the Supply Chain Duty of Care Act adopted in 2021, to which Tele Columbus will be subject from 2024, the avoidance of human rights violations by law will become a key issue for Tele Columbus. [GRI 2-24, GRI 3-1-GRI 3-2 GRI 3-3]

2.1 Key topics

In preparation for the European Corporate Sustainability Reporting Directive (CSRD), which will also apply to Tele Columbus in the future, and in accordance with the European Sustainability Reporting Standards (ESRS), the

new analysis was intended to determine whether the principle of double materiality gives rise to further aspects that need to be taken into account in reporting. So far, the positive and negative effects (inside-out perspective) of the company on sustainability issues have been determined. The “financial materiality” (outside-in perspective), including all opportunities and

essential topics.



risks relating to sustainability impacting the company's financial situation and the future viability of the business model, was also assessed. The results have already been incorporated into this report. We did not yet have the results of a survey of our stakeholder groups, which was also initiated at the end of 2023.

2.2 Guiding principles

To give our corporate social responsibility measures a holistic and strategic dimension, the Management Board and Supervisory Board of Tele Columbus AG have adopted a sustainability strategy that contains binding targets for each area of activity identified as material. Our sustainability strategy highlights our commitment to our corporate responsibility and close partnerships with our key stakeholders to meet their requirements.

We take responsibility for our partners: For our partners in the housing industry, our broadband networks ensure value retention of properties, make homes better places to live and allow residents to engage in social discourse.

We take responsibility for our customers: We provide high-performance and clearly structured products for our end customers. Our commitment here is to communicate transparently and on an equal footing with the users of our services at all times.

We take responsibility for our employees: Family-friendly working arrangements, occupational health and safety and support of employees through training opportunities matter to us. As a modern employer, we take our diversity and gender equality obligations

seriously. We also promote humane working conditions in our supply chain.

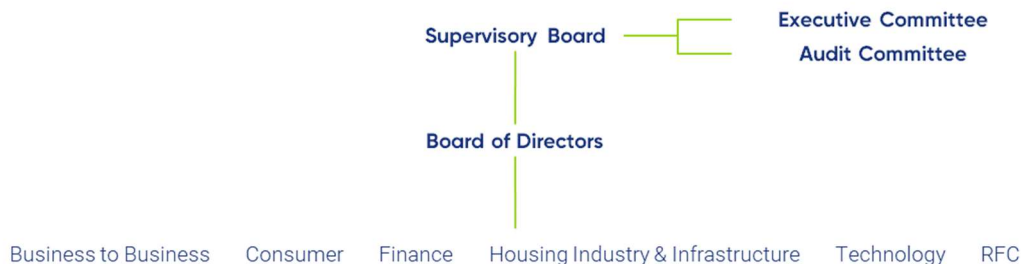
We take responsibility for the environment and society: As a company, we invest in sustainable, and therefore future-proof, technologies and are increasingly gearing all our activities towards sparing use of natural resources.

2.3 Organisation, management, incentive systems

Key strategic decisions relating to social responsibility and sustainability are within the purview of the Management Board and the management team. The

Management Board of Tele Columbus AG is also responsible for managing sustainability projects. The Chief Executive Officer bears the core responsibility for managing sustainability projects. This level of involvement ensures that objectives are achieved thanks to short decision-making paths and by effectively securing the collaboration of the specialist departments responsible for implementation. Management Board members are nominated and appointed by the Supervisory Board. Members of the Supervisory Board are nominated on the basis of proposals by the majority shareholders and then confirmed at the general meeting. The details of this process are set out in the Group's rules of procedure. The Management Board is the highest executive body, while the Supervisory Board monitors the Management Board in its role as an oversight and advisory body.[GRI 2-9, GRI 2-10, GRI 2-11, GRI 2-12 GRI 2-13, GRI 2-14].

governing bodies.



About this report.

The responsible departments are fully involved in the development of social and ecological measures. A CSR steering committee consisting of representatives from all departments meets several times a year to discuss ways in which operations can be optimised to help achieve sustainability targets. Key performance indicators (KPI) are applied to all projects. Additional key performance indicators with long-term targets have been created to reinforce the significance of the environment, social issues and corporate governance.

In 2023, the steering committee focused on measures aimed at achieving the ESG Strategy 2030 adopted in April 2022. It discussed to which degree changing the network expansion priorities would have an impact on the expected cut in the energy required in network operation. Another point subject to discussion was determining the energy demand of air conditioning systems in order to post it separately as part of the climate footprint.

The Corporate Communications department acts as the central point of contact for ESG planning and the reporting process relating to sustainability considerations.

In 2023, in conjunction with the responsible Compliance and Procurement departments, the department dealt with delivering on the requirements of the German Supply Chain Duty of Care Act (LkSG) and processed numerous enquiries from the specialist departments and our customers, who in turn need to comply with the LkSG.

Another subject matter was the timely implementation of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (in short: EU Taxonomy Regulation).

In preparation to meet the requirements of the Corporate Sustainability Reporting Directive, ESG reporting software was procured that allows data collection, processing and document backup to be presented in a way which is audit-proof.

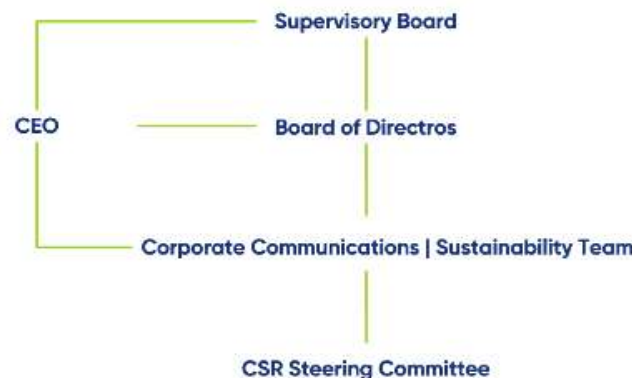
The Supervisory Board has defined principles for the remuneration of the Management Board of Tele Columbus AG that are geared towards the sustainable

success of the company and take into account relevant stakeholder objectives. [GRI 2-20]

The leadership quality of directors and the management team was assessed on the basis of anonymous employee surveys concerning the company values of simplicity, efficiency and fairness. The results of the assessment flow into the bonus calculation.

In order to increase awareness regarding sustainability topics, various projects on matters such as personnel development, IT modernisation and internal control systems were launched. Sustainability goals find their way into the wider workforce through managers in order to make sure that they are firmly embedded throughout

CSR management process.



the company. As part of the CEO 2 managers sample survey conducted online, responses obtained revealed that 30.6% of all staff pursue a work goal that has an ESG impact. In 93% of the cases presented, ESG targets were also relevant for bonus payments. The response rate to the survey was 55%, while the sample size was 12% of the total workforce. The agreed ESG work objectives ensure that sustainability is firmly entrenched. [GRI 2-18, GRI 2-19, GRI 2-24]

2.4 ESG Strategy 2030

Tele Columbus AG has committed to achieving fully climate-neutral operations by 2050. A corresponding commitment has been published on the company's website. <https://www.telecolumbus.com/en/sustainability/> [GRI 2-22]

In April 2022, the Management Board and Supervisory Board of Tele Columbus AG agreed a sustainability strategy up to 2030, which contains two goals for each of the ESG subject matters (environment, social and governance). [GRI 2-12, GRI 2-17]

The previous ESG goals up to 2024 were carried forward unless they had been achieved ahead of time:

The ESG Strategy up to 2030 comprises six goals, including a real reduction in the organisation's energy consumption and climate-neutral data transfer (taking into account combustion fuels). Our social goals are to increase the proportion of women in management

positions so that half of our managers are female by 2030, as well as to raise the employee net promoter score (eNPS) above the usual level in the industry today. In the area of governance, Tele Columbus intends to avoid all compliance cases that have not been processed and documented in the proper manner. The company also aims to expand its monitoring of the supply chain to cover 90% of its annual purchasing volume, which goes well beyond the requirements of the German Supply Chain Act. A review of the ESG objectives by the current Management Board is in preparation. [GRI 2-22]

2.5 Non-financial risks

Tele Columbus has a Group-wide risk management system in place to identify risks at an early stage and handle them.

The aim here is to ensure systematic recording and assessment and therefore deal with risks and opportunities conscientiously. Risk management allows Tele Columbus to identify adverse developments at an early stage in order to introduce counter measures in good time and monitor the situation. Potential non-financial risks relating to the impacts of the company's business activities were assessed, as were the impacts arising in connection with the company's business activities, for instance in the upstream and downstream value chain. [GRI 2-24]

ESG	Goal for 2030	Target value
Environment	Reduce energy consumption (GHG Protocol Scope 1 & 2) by 35% (base year 2021)	22,710 MWh
Environment	Reduce CO _{2e} intensity per terabyte transferred (GHG Protocol Scope 1 & 2) to zero (base year 2020)	0 kg/TB
Social	Increase the proportion of women in management positions (base year 2021)	35% Including management/Management Board
Social	Improve the eNPS referral rate (base year 2021)	+5 pts
Governance	No unsolved compliance cases	0
Governance	Assess suppliers for possible environmental and human rights risks	90% of the purchasing volume p.a.

Detailed information on the risk management system at Tele Columbus can be found in the “Risk report” chapter in the Group management report.

2.6 Consequences of climate change

In 2022, all climate change-related risks for our networks were subject to an external review that included a geodata-based risk analysis of the major technical equipment in our cable networks (head-ends). A phased action plan designed to strengthen the climate resilience of our networks was drawn up with the aim of managing existing potential threats to the reliable functioning of our networks posed by rising air temperatures or extreme weather events. The measures include extensive reviews as part of location upgrades, severe weather warnings being sent to regional service teams and enhanced requirements for protecting technical facilities. In consideration of the action implemented and planned, no material risks were identified with regard to forest fires, heat waves, droughts or floods. [GRI 201-2]

2.7 Procurement risks

To achieve our ESG goals, we need to put in place a suitable framework. Electricity from renewable sources and upstream products that are needed to further reduce greenhouse gases may not be available at all times. Further risks arise from the geopolitical situation and its impact on transport routes, as well as from the influence

of regulatory framework conditions that restrict the free choice of products for cyber security reasons.

2.8 Sustainability ranking

In 2023, Tele Columbus AG took part in an independent assessment of its sustainability performance. The Global Real Estate Sustainability Benchmark (GRESB) is an international system for assessing and measuring the sustainability performance of businesses and funds in the fields of real estate and infrastructure. The so-called GRESB score is a weighted total of eleven categories. Such ESG scores make a significant contribution to improving the comparability of a company's sustainability performance.

The 2023 test result puts Tele Columbus AG in first place in a peer group comparison with six comparable European fibre-optic network operators. In a global comparison of 51 companies in the data transmission sector that took part in the GRESB sustainability ranking, Tele Columbus comes in fifth. Tele Columbus achieved a clear five-star rating with 97 out of 100 points (previous year: 88/100). [GRI 2-18, GRI 207-2]



2.9 Involvement of stakeholder groups

Tele Columbus engages closely with all stakeholder groups.

The last stakeholder survey was conducted in 2022, and the results of the survey are incorporated into the strategic focus of our sustainability management.

New agreements were entered into with broadcasters to distribute their programmes across our networks. An agreement was reached with the regulatory authorities on the requirements for appropriate labelling of so-called “public value programmes”. The responsibility for this rests with the Content department in the Consumer business division.

We have reorganised our investor relations activities as part of the refinancing negotiations. During the transition phase, communication with the financial market was intensified with the involvement of external advisors, particularly with capital providers, investors and bondholders. This falls within the purview of the Finance department.

In the course of sustainability assessments, Tele Columbus fielded questions from banks beyond the information published in the CSR Report 2022. The Sustainability team at Tele Columbus AG also held regular discussions with political players in 2023. Both the Federal Network Agency and the Federal Ministry for Digital and Transport rely on our expertise to measure

and compare sustainability in telecommunications. This is the responsibility of the Corporate Communications department.

An open day for customers, featuring a varied programme of presentations, was held at the Leipzig data centre in September 2023. Business customers were given broad insight into data centre-based

Partners	Suppliers	Associations	Regulators	Financial market	Customers	Investors
Housing industry	Property lessors	Chamber of commerce and industry and regional economic committees	Mayors and municipal authorities	German Federal Gazette	Shops	Annual report
Housing industry advisory board	Service providers	Housing industry associations	Federal Ministry for Economic Affairs and Climate Action	Financial analysts	Mailings and websites	CSR report
Signal sub-suppliers	Suppliers	Telecommunications industry associations	Federal Ministry for Digital and Transport	Investors	Customer surveys	
Cities and municipalities	Third-party line provider		Parliamentary media committees		Local sponsoring	
Broadband initiatives	Software and hardware suppliers		Federal Network Agency		Consumer advice centres	
Radio/TV broadcasters			Federal Office for Information Security			
			Federal Commissioner for Data Protection and Freedom of Information			

About this report.

applications such as IT integration, cloud performance monitoring and regionalised data distribution.

Tele Columbus, represented by PÿUR Business (HLkomm Telekommunikations GmbH), had its own stand at the industry's leading trade fair ANGACOM in Cologne for the first time in many years in 2023. The stand was the backdrop to the significant presence of our board members and directors in the relevant panel

discussions and made a valuable contribution to communicating with our competitors, suppliers as well as trade press journalists.

On Thursday, 13 July 2023, the Annual General Meeting of Tele Columbus AG took place as an in-person event in Berlin.

Regular customer surveys and the annual employee survey complete the scope of contact with our stakeholder groups.

[GRI 207-3, GRI 2-29]

Customers and products

3.1 Digital inclusion

Modern fibre networks allow us to provide high-performance connections for businesses in addition to fast internet, telephone lines and high-resolution TV for home customers. Accordingly, the Tele Columbus Group increases the transmission capacity of existing networks on an ongoing basis and campaigns to the housing industry for a transition to a purely fibre-optic network to cover future increases in demand for bandwidth with seamless scalability. The huge data transmission capacity of the fibre-optic cables forms the basis for high reserve capacity, which is crucial to the provision of broadband internet.

Greater demand for high bandwidths

PYUR's high-performance Internet connections have met with great interest among end customers. Around a third of new customers choose products with a download bandwidth of 400 Mbit/s or faster. Almost one in five new internet customers now opts for a gigabit product (18%).

With the construction of new optical fibre networks, and modernisation of existing networks, we are laying the foundations for regions to profit from this trend towards a digital society. Our networks will not only benefit metropolitan regions, but also mid-sized towns and

districts that previously only had limited access to broadband. Local, fibre-based, high-performance infrastructure has never been so important as a key location factor for business districts and, consequently, for job creation outside conurbations. Our enterprise solutions division, PYUR Business, delivers wholly fibre turnkey development concepts for municipalities and businesses [GRI 203-2].

Empowering local communities and social commitment.

In addition, our networks ensure the basic TV provision for the receipt of all must-carry services (channels that must be provided according to the legislator). Through supply of ARD programmes from neighbouring federal states and additional local TV stations, our distribution networks are also strengthening local and regional diversity of opinions and consequently provide socially important communication platforms, even across state and national borders.

Tele Columbus networks therefore play a key role in increasing participation in social discourse throughout the entire social strata and local communities. In light of this, Tele Columbus is a shareholder of Jena TV and actively committed to local media diversity. At the same time, our networks have a high stake in the future-oriented broadband supply throughout Germany.

Some of the work we do to empower local communities in our network regions includes promoting club and

amateur sports. Football camps and charity football tournaments are part of our activities during the Easter and summer holidays. In our network areas, we have continued the courtyard concerts in retirement homes in Chemnitz with three events at different facilities. Another cornerstone of our social commitment is our close bond with Elternhilfe krebskranker Kinder Leipzig e.V., a charity supporting parents with children suffering from cancer. In addition to a donation cheque, we once again co-financed a charity concert at Leipzig's Gewandhaus and the proceeds from the football tournament at SV Stötteritz were also donated to the Elternhilfe initiative. We were also the sponsor of the integrative sports festival in Köthen. The Arche federal association enjoys access to the internet via a full fibre-optic connection provided free of charge by PYUR Business. The Bärenherz association, which helps finance the children's hospice located in Markkleeberg near Leipzig, also receives support from PYUR Business.

Our purchasing activities also help empower local communities and safeguard jobs. For example, Germany accounts for 95% of our purchasing volume. The customer service call centres are located in Dresden, Leipzig, Berlin and Bruchsal. A call centre team based in Greece supports our customer service activities. This is the responsibility of the Contact Centre division of the Technology business unit.

The IT department is continuing its efforts to reintegrate work that was previously outsourced to external employees back into the company. In 2023, 26 positions

were filled internally by doing so. The project is being continued in 2024. This is the responsibility of the Chief Information Officer, who reports directly to the Management Board. [GRI 204-1, GRI 413-1]

3.2 Data protection

The Tele Columbus Data Protection Policy applies to all Tele Columbus Group companies in which Tele Columbus AG holds a direct majority interest or the majority of the voting rights. It applies personally to all employees and senior company executives, and pertains to all categories of data subjects (customers, employees, suppliers, etc.) subject to its scope of validity.

The Legal department oversees all data protection topics and is supported in matters relating to data protection by an external data protection officer. Furthermore, the IT Operations department has appointed an IT security officer to ensure state-of-the-art security of our IT systems, identify vulnerabilities and close security gaps quickly.

Our data protection efforts at the Tele Columbus Group are aimed at meeting the statutory requirements for storage and management of sensitive data at all times, notifying the responsible regulatory authorities immediately in the event of incidents relating to data protection and informing affected customers and advising them on how best to limit any damage.

In view of the processing of personal data and the ever-growing complexity of IT systems, data protection is a hugely important topic for the Tele Columbus Group.

IT baseline protection as per ISO 27001 and quality management as per ISO 9001 are ensured at PÿUR Business. Annual re-audits are conducted with assistance from the Quality and Security Management department.

The Tele Columbus data protection team was once again expanded in 2023, with a key focus being placed on harmonising the level of data protection across the entire Group.

The year 2023 was characterised by the new regulations for international data transfer, which played a major role at Tele Columbus. National regulations, such as in the field of the Whistleblower Protection Act or the Telecommunications Modernization Act, required further implementations. Data protection was taken into account in many new projects and contracts from the outset, thereby improving the level of data protection for both employee data protection and customer data protection. It is worth highlighting the PÿUR TV project, which aims to offer customers a new and improved television experience.

One of the cornerstones of the ongoing development of Tele Columbus' data protection organisation was designing a new deletion and blocking concept and adapting the data protection guideline, both of which are to be rolled out across the Group in 2024.

Mandatory annual training ensures that employees are continuously made aware of the need to treat sensitive and personal data carefully. Data protection awareness in particular is being improved continuously by maintaining closer contact to individual departments. Despite the substantially heightened cyber threat situation, no data protection incidents with the ability to inflict significant damage were recorded in 2023.

In the course of the year, the data protection team processed 44 requests for information under GDPR. The company also reviewed 370 requests from data subjects in accordance with Article 15 et seq. GDPR. These included 30 complaints about a possible violation of privacy. In fourteen cases, a notification was sent to the Federal Commissioner for Data Protection and Freedom of Information (BfDI) following a review of the situation by our data protection team. Tele Columbus AG received three enquiries from the BfDI regarding data protection. All reported cases relate to 2023.

The supervisory authorities did not issue a warning or impose a fine on Tele Columbus. [GRI 418-1]

3.2.2 Cybersecurity

In 2023, drills were repeatedly held in which employees were put to the test to identify and report suspicious incidents and practise the correct behaviour. A comprehensive emergency plan has been drawn up that defines the procedure in the event of a targeted attack. The objective is to be prepared as well as possible given the growing threat situation.

Security is also a top priority for our data centres. In 2023, as part of the recertification process, TÜV NORD GROUP certified that the data centre of HL komm Telekommunikations GmbH in Leipzig meets the high protection requirements of the Trusted Site Infrastructure criteria catalogue “TSI.STANDARD v4.3 Level 3 (extended)”.

3.3 Customer satisfaction and service quality

To give its customers an outstanding customer experience, Tele Columbus AG is paying increased attention to customer service work and customer satisfaction. Our customers are the users of our network connections, as well as customers in the housing industry with whom the requisite operating and supply agreements have been concluded.

Customer satisfaction is measured on an ongoing basis through surveys. The “Net Promoter Score”, or NPS for short, is the relevant measurement method. In addition to the NPS, we also gather information on the availability and problem-solving skills of our employees. In order to gain comprehensive insight into customer satisfaction, the contact volume, product booking trends and cancellation rate are included in the calculations. The appeal of the product portfolio is measured according to the number of products (RGUs or revenue-generating units) sold.

In 2023, more than 166,000 customers were surveyed after a service contact and the results were analysed

externally. The problem resolution rate fell slightly by 1.8% and as a result the NPS fell by 1.5 points. Overall, the results are roughly at the same high level as the previous year. [GRI 2-29]

In a comparison of providers, the rate testers of the trade magazine “connect” ranked landline products offered by PÝUR, the brand of Tele Columbus AG, very positively. Our products for frequent users (200 Mbit/s download bandwidth), power users (400 and 500 Mbit/s) and the gigabit tariff with 1,000 Mbit/s came out on top against the competition. PÝUR also made it onto the winners’ podium in the customer service hotline test conducted by the trade magazine “connect”. PÝUR came in first in the regional provider category, achieving an overall rating of “excellent” for the third time in a row.

The major acceleration in the technological shift towards pure fibre-optic networks will likely increase the focus on measuring customer satisfaction in FTTH households in order to emphasize the impact of investing in the expansion of fibre-optic networks, both in terms of product quality and customer satisfaction.

Responsibility for the project to improve the customer experience lies with the Customer Experience Management department and was assigned to the portfolio of the Chief Consumer Officer’s division in 2023.

3.4 Products and innovation

Fairness, simplicity and efficiency are the benchmarks for our day-to-day work and actions. These three core brand values are intended to create a holistic awareness among employees that a product or a service is more than the mere consideration of price and performance.

Our packages and products are structured transparently and can be booked individually and flexibly. Predominantly short-term promotions have led to the successful acquisition of new internet and telephony customers in particular. Greater emphasis has been placed here on target group-specific communication via social media channels.

Launch of PÝUR TV

Tele Columbus launched a new TV and streaming platform for the PÝUR brand in December 2023. PÝUR TV HD is a hybrid solution for linear television via the cable connection and flexible on-demand offerings using an internet connection. Compared to pure IPTV solutions, the combination of cable TV and streamed content offers uninterrupted, stable TV playback in perfect HD picture quality, limited lags during live broadcasts and lightning-fast programme changes. Popular apps from Netflix, RTL+, Prime Video and Disney+ as well as YouTube are already pre-installed. This means that customers’ subscriptions can be integrated into PÝUR TV HD immediately. Additional offers can be installed at any time via the Google Playstore.

The feature is enabled using a set-top box from a well-known European manufacturer. Production is based in Tunisia. Best results are achieved for both operating power consumption and CO_{2e} in production, which also address the higher expectations toward greater sustainability.

The Products & Growth department is responsible for the design of our television, internet and telephony products.

Gigabit switchover

By the end of the year, Tele Columbus Group had made 2.1 million homes gigabit-capable. The increase in the proportion of residential properties connected with gigabit is primarily due to the upgrade of the networks to DOCSIS 3.1 transmission technology.

The upgrades to gigabit speeds are being implemented by Central Technics and the product launches are being supported by the Campaigning department of Products & Growth.

Wholesale and open access

Products from other providers can be made available in our network based on wholesale agreements. This puts an end to the situation that had evolved over time where the cable company selected by the property's owner also provided high bit-rate internet connections for residents and tenants. Infrastructure competition is therefore opened up between providers of telephone lines and cable connections, which gives tenants freedom of choice when it comes to both services. In 2023, Tele

Columbus Group continued to push opening its networks in organisational terms and created the position of Director Wholesale in March. The Wholesale business was transferred to the executive staff of the CEO. This step highlights that the non-discriminatory opening of the network is fundamental to the Tele Columbus corporate strategy.

With the increasing number of full-fibre optic connections (FTTH), cooperative agreements will continue to gain in importance, for example through shared use of the infrastructure as part of a fibre lease.

Fibre optic expansion with the German housing industry

The GdW Federal Association of German Housing and Real Estate Companies and the Tele Columbus Group have adopted a position paper on the expansion of fibre optics. GdW member companies have the option of a free full roll-out, operation with four fibres per home and the opening of the networks as a basis for long-term cooperation. FTTH connections for a significant six-figure number of residential units have already been agreed in the course of the year as part of new licence agreements, which will be rolled-out in the coming years.

3.5 Communication and transparency

The PÿUR brand values of fairness, simplicity and efficiency present a particular challenge for internal and external communication. We aim to ensure the information we provide is always suitable for the respective situation, comprehensible and clear.

A "gender guideline" is part of the communication guidelines. Our communication is to be respectful and inclusive, addressing everyone as they are, while also being effective and easy to read.

Special communication formats

Due to the change in the Management Board and management, the Corporate Communications department had its work cut out to introduce the new members of the Management Board and to create transparency about changed responsibilities, organisational structures and objectives.

The special page at <https://www.pyur.com/darum-pyur.html> explains to our customers how we devise improvements based on the wide range of customer surveys conducted after service contacts. Content was developed by Customer Experience in collaboration with Brand Marketing Communication and Corporate Communications. It is supported by videos in which 15 colleagues introduce themselves and their area of work.

Suitable applicants are to be recruited via the PÿUR brand, which is positively charged with corporate values and has a greater overall household and media presence than the Tele Columbus AG umbrella company. The careers section has therefore been moved from the Group website to <https://mein.pyur.com/static/karriere/>. This is also where "Darum PÿUR" content resides.

The content of Darum PÿUR was developed by Customer Experience. Human Resources is responsible for the careers page.

More video productions

The company's own video studio has become a go-to source for producing video messages and clips for social media channels. We are making greater use of video formats on our intranet, while also producing and successfully utilising a growing number of our own videos for training purposes. In addition to improving transparency and communication, corporate television also has the potential to reduce emissions. Previously, physical "town hall meetings" were organised by management and the Management Board at various business locations, which involved more travelling. These are no longer necessary thanks to live video broadcasts. Regular updates from the Management Board about current developments are broadcast to all employees as a live TV format via the intranet and garner a viewership of 75 to 80% of employees. Depending on the venue, up to 80 seats on-site are also available, which are usually in high demand.

Video technology also eliminates the need for occasional travelling by those responsible for TV interviews, as PÿUR is able to transmit a 4K signal to the control rooms.

The backbone of internal communication is and remains the internet, of course, with daily reports and background information. Around 350 articles are produced annually. The intranet homepage was accessed over 2.4 million times between 1 January and the beginning of December. This corresponds to around 1,900 views per employee. The intranet is also the central point of contact for accessing the numerous online tools or finding the right contact person in the organisation chart. A complete relaunch of the intranet platform was commissioned in 2023 in order to continue to deliver on the multi-faceted communications tasks in the future. This is the responsibility of the Corporate Communications department.

Social media

The increased production of content such as videos and special pages was one of the main ways in which the company further extended its reach across its social media channels in 2023. A particular focus has been placed on strengthening PÿUR as an employer brand. Employer attractiveness also has a direct impact on the ESG 2030 goals. In this respect, we are pleased to have grown our number of followers on LinkedIn by 150% year-on-year in 2022 and by 160% in 2023. The Tele Columbus AG Group, our PÿUR brand and our B2B division PÿUR Business have their own presences on the relevant social media channels. An interdisciplinary team involving Marketing, Events and Corporate

Communications has been deployed to synchronise social media activities.

Trade fairs, events, publications

In 2023, Tele Columbus, or more precisely our business customer division PÿUR Business, had its own booth at the cable industry's leading trade fair ANGA COM.

Tele Columbus offers trade journalists compact webinars on the subject of optical fibre, which continue to be well received. Other key developments were addressed in articles written for the trade. This is within the purview of the Corporate Communications department.

The Human Resources team at Tele Columbus also attended regional job fairs.

Investor relations

Investor Relations kept the capital market informed in regular communications about quarterly figures and the annual report as well as the refinancing ahead. On 22 November 2023, Tele Columbus announced that its main shareholder Morgan Stanley Infrastructure Partners would provide additional equity in the amount of 300 million euros. At the same time, the company announced that the so-called ad hoc group of the material financial creditors has undertaken in a binding agreement to extend the financing totalling around 1.1 billion euros at par until October 2028.

Over the course of the year, the focus was primarily on refinancing, which resulted in ongoing stakeholder communications with virtual and physical participation in investor meetings. Interest in our sustainability initiatives remains strong among credit investors. With a five-star rating in the GRESB sustainability ranking, Tele Columbus made a clear statement in favour of sustainable networks and responsible corporate governance.

The 2023 Annual General Meeting took place on 13 July 2023 at the headquarters in Berlin.

The Corporate Communications department is responsible for internal and external communications, whereas the Investor Relations department is responsible for financial market communications. [GRI 2-29, GRI 207-3]

Resources

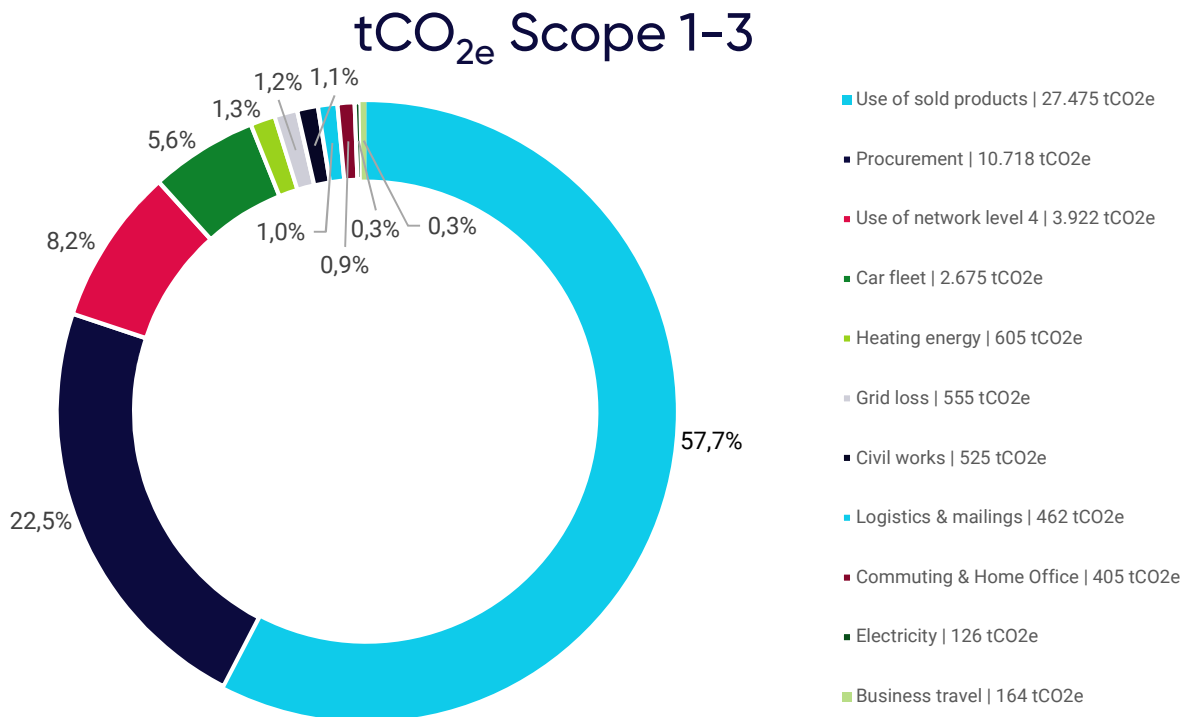
Environmental responsibility is a key part of sustainability management for Tele Columbus. When it comes to the significance of greenhouse gas emissions (GHG for short) for the company, there is a particular focus on electricity consumption and energy procurement. Procurement and product usage are also major influencing factors impacting our carbon footprint. The calculations are based on the control approach used in operations. [GRI 305-1, GRI 305-2, GRI 305-3]

Materials used to expand our networks and the procurement of hardware provided to customers were included in the calculation of indirect emissions. Another calculation is used to determine emissions generated from the use of our products by end customers. Our carbon footprint is based on the Greenhouse Gas Protocol. Available emission factors, consumption accounts, extrapolations and estimates were applied in the calculation. Where figures are based on an estimate, this is indicated.

Our end customers use hardware such as modems and digital cable TV receivers (set-top boxes) to access our services. Tele Columbus mainly rents out the requisite hardware. When the contract expires, the rented items are returned to us.

As a result of this, we benefit from the opportunities of professional reprocessing. This has given rise to a recycling process that helps to reduce electronic waste. The aim is to use resources as efficiently as possible, thus reducing negative impacts on the environment.

The Facility & Logistics and Procurement departments are responsible for logistics and purchasing and report to the Management Board.



4.1 Electricity consumption

Within the Tele Columbus Group, operation of the networks and data centres accounts for a large amount of the electrical energy used. The Facility unit of the Facility & Logistics department is responsible for energy purchasing. Other responsibilities are assumed by HL komm Telekommunikations GmbH Leipzig and RFC Radio-, Fernseh- und Computertechnik GmbH Chemnitz. Carbon footprint data is determined on the basis of electricity supply contracts. In the case of partial quantities for which the power quality could not be verified beyond doubt, the average value published by the German Environment Agency for 2022 was used as a guideline. [GRI 305-1, GRI 305-2, GRI 305-3]

Electricity reductions in our networks stem from network construction projects that involve energy-efficient fibre technology from the outset. The modernisation of existing networks has also played a major role. Tele Columbus works towards the greater use of fibre technology here. Fibre-optic data transfer is considered to be particularly energy-efficient. In the coming years, the accelerated fibre-optic expansion will contribute to a decline in the energy consumption of our networks. [GRI 302-5]

The Technology division is in charge of the design of network construction and modernisation. Investment in our networks is geared towards enhancing performance while increasing energy efficiency even further.

A total of 24,100 MWh was used to operate Tele Columbus Group networks, with 1,582 MWh attributable

to administration and stores. The proportion of certified green electricity used to supply our networks and properties was 99.1% in 2023. This results in remaining CO₂ emissions of 126 tonnes for the Group's electricity supply.

The business customer division PÿUR Business (HL komm Telekommunikations GmbH, a Tele Columbus Group company based in Leipzig specialising in IP services) has been committed to the use of renewable energies in the operation of its fibre-optic networks and data centres since 2019. PÿUR Business uses rented data processing facilities and its own data centre in Leipzig, as well as technical facilities in Saxony and Saxony-Anhalt whose electricity supply is secured by Tele Columbus. The electricity consumption amounted to 5,286 MWh.

HL komm operates another data centre in Berlin. Tele Columbus ensures that the electricity needed by this facility is also covered in full by renewable sources. Total consumption amounted to 2,828 MWh in 2023. This electricity was purchased by the data centre's operational service provider. Together with the technical data centre operator, PÿUR Business is guided by the principles of the Sustainable Digital Infrastructure Alliance, which include a comprehensive roadmap for climate protection until 2030. [GRI 305-1]

Tele Columbus Group recorded significant growth in 2023 with a transferred data volume of 1.65 exabytes (+37.5% year on year), which corresponds to a data volume of 251 GB per active connection and month. In addition to IP customer growth, the unusual increase in

data volume is due to the first-time inclusion of cache volumes. Frequently accessed internet content is partly retrieved via the network's own cache memory. This speeds up response and loading times and reduces network load. The effect of cache loading accounts for around 20% of data volume. If this effect is factored out, the net increase in data volume of 17.5% is roughly on a par with the previous year's level of 16.5%.

KPI	2021	2022	2023
Power consumption kWh/terabyte	21.9	19	14.6
GHG intensity kg CO _{2e} /terabyte	1.9	1.4	1.4
Percentage of renewable energies	99.4	99.7	99.1

If we divide the total electricity consumption of our networks by the volume of transferred data, energy consumption per terabyte comes to 14.6 kWh. In comparison to the previous year's figure of 19 kWh, it would now be 18.3 kWh per terabyte without taking the data cache into account. All climate-relevant emissions (Scope 1 & 2) taken together amount to 1.38 kg CO_{2e} per transmitted terabyte, based on the networks of Tele Columbus Group. [GRI 305-1, GRI 305-2, GRI 305-3]

The organisation’s energy consumption takes into account the total electricity requirements of offices, shops, network equipment and data centres, as well as fuel and energy for heating and cooling.

Overall, the organisation’s total energy consumption in 2023 was 41,527 MWh, which corresponds to 149,497 gigajoules. [GRI 302-1, GRI 302-3]

Planned use of photovoltaic energy

Tele Columbus is trialling the use of photovoltaic systems at larger cable head-ends. The first systems are to be installed at the network locations in Naumburg, Altenburg and Grimma in central Germany. The installation of the first system in Grimma was completed at the end of the year. The planned electricity yield of the three planned systems will be around 34,000 kWh per year.



The Network Service & Development department is in charge of the project.

Energy audit

The first recommendations from the last energy audit were implemented in order to realise additional energy optimisations. The target temperature of the air-conditioning units was raised to 22 degrees in the head-ends and server rooms. Furthermore, any equipment that is no longer used was taken out of service. Savings potential of 2.5% is expected from the air-conditioning systems at the technical facilities. The last energy audit estimated that potential savings of such measures could amount to 239,000 kWh. [GRI 302-4, GRI 305-1, GRI 305-2, GRI 305-3]]

Heating and air conditioning

Despite low office attendance, 2023 again saw the energy required to heat buildings used by Tele Columbus Group increase, this time by just shy of 11% year-on-year

to 2,500 MWh. In total, various energy sources contributed 598 tCO_{2e} to our carbon footprint. This outlay also includes a ventilation cooling system powered by district heating.

For 2023, the share of cooling and air conditioning in the total electricity demand was assessed for the first time. One estimate comes to the conclusion that 2,990 MWh is attributable to the air conditioning of technical systems.

While the influence of air conditioning systems for cooling in server rooms and in the large signal distribution points (cable head-ends) of the network plays a significant role, the leakage quantities of refrigerants with their potential CO_{2e} equivalents are insignificant. This factor is therefore not included in the carbon footprint. This assessment is based on a worst-case calculation and spot checking maintenance logs. [GRI 305-1, GRI 305-2, GRI 305-3, GRI 305-4, GRI 306-3]

Energy consumption in MWh

	2020	2021	2022	2023
Total Group	29,515	29,466	28,073	30,968
TC networks ¹ incl. energy for self-procured cooling capacity	22,897	22,514	23,130	24,100 ¹
HL komm network	677	401	894	1,049
Data processing facilities, technical facilities, Leipzig data centre	5,701	5,112	4,944	5,286
Berlin data centres			2,404	2,828
Offices & shops		1,317	1,500	1,582

4.2. Mobility

Much of the mileage covered by car is due to customer service and customer contact. Some of the journeys are unforeseeable, and not all destinations can be easily reached by public transport. Cars are also essential for technical field staff. Vans are used to troubleshoot line routes, with tools and spare parts also having to be transported in case a repair is necessary.

Scope 1 Mobility	2021	2022	2023
Millions of km driven by car	8.02	10.6	13.5
Car tCO _{2e}	1,483	1,877	2,168
Car gCO _{2e} /km	185	176	161
Millions of km flown by aeroplane	0.16	0.11	0.26
Aeroplane tCO _{2e}	42 ¹	28	69
Flight offsetting	100%	100%	-
Millions of km travelled by train	0.23	0.7	1.31
Train tCO _{2e}	-	-	-

The vehicle fleet's mileage reached a new all-time high of 13.3 million kilometres (previous year: 10.6 million kilometres). This is a development which was largely expected in this amount on the back of the fibre optic

strategy. This is mainly driven by closer contact to the real estate industry and the deployment of engineers as part of the gigabit and fibre optic upgrades. Given the resulting emissions, the timing of the renewal of the vehicle fleet is good. The CO_{2e}/km fell to 161 grams, down 8% on the previous year and -14% on 2020. The use of plug-in hybrid vehicles plays a certain part in this. We estimate that around 200,000 kilometres were covered electrically in the mix. Information on the number of kilometres travelled and the amount of fuel used was collected and tallied by external service providers. [GRI 302-4, GRI 305-1, GRI 305-2, GRI 305-3]

Train instead of plane

No more domestic flights on routes of less than 500 kilometres. Traffic is being shifted to the railway.

Many employees travel between the company's largest locations in Berlin, Leipzig and Munich. With 1.31 million passenger kilometres, we practically doubled the previous year's figure (699,887 km). According to the travel expense guidelines, distances of less than 500 kilometres may no longer be flown. Despite the shift to rail travel, 2023 will be the first year in which we again register an increase in air travel. This was mainly due to the necessary trips by the Management Board to international financial centres and in-person meetings with the majority shareholders in the USA.

Employees are also given the opportunity to take advantage of offers by the bike leasing service JobRad. In 2022, 78 applications were submitted. 78 bicycles are in use. [GRI 302-4]

Our commissioned travel agency calculated the 2023 CO_{2e} amounts of hotel overnight stays for the first time. The calculation multipliers to do so were determined using the Defra database. The CO_{2e} equivalent of 164 tonnes generated by business air travel and hotel accommodation was offset with compensation certificates.

The Facility & Logistics department is responsible for the vehicle fleet, business trips and job bikes.

In 2023, a company agreement on work from home (WFH) was adopted, which allows extensive flexibility in terms of whether employees go to office locations. In terms of impact, we can generally say that WFH has remained roughly at the level of the pandemic years, while hygiene regulations applied. With attendance at around 30% at the company locations, 451 tCO_{2e} (previous year: 480 tCO_{2e}) was calculated for employee commuting. Attendance at the company locations mandated by the employer accounted for 301 tCO_{2e}, which is included in our carbon footprint. On the other hand, the Group achieved a saving of 376 tCO_{2e} based on the agreement on WFH.

The calculations take into account the different transport methods typically used, part-time work and employee groups who were unable to benefit from the flexibility of remote working. The assumptions on

commuter-related emissions are based on the data analysis relating to “carbon footprints in everyday transport” taken from the “Mobility in Germany” study, which was published by the German Environment Agency in 2020.

There is also trend towards employment contracts in which working from home has been agreed as the chosen form of employment. In addition to mandated attendances at company locations, which are treated as business trips, the CO_{2e} from working from home, consisting of electricity and pro rata heating costs, was taken into account with 104 tonnes.

The calculations were carried out by the Corporate Communications department. [GRI 305-1, GRI 305-3]

4.3 Hardware circularity

The supplied customer hardware is returned to us after the contract expires. To make full use of the expected service life and thus reduce electronic waste as much as possible, the used hardware is examined, cleaned and returned to customer circulation. The quantity of reconditioned customer hardware continued to be stable from the previous year. The reprocessing rate is currently around 85%.

Along with customer modems, items such as smartcard modules, CI cards, remote controls, mains adapters and connecting cables were reconditioned. This enabled 222,641 devices and components to be approved for reuse in 2023. Such refurbishment prevented almost 99.1 tonnes of electronic waste in 2023. Besides

increasing inventories, reconditioning customer hardware is also a significant factor in securing supply capabilities.

A good proportion of reconditioned customer hardware is shipped using the same packaging in which the devices were returned to us by end customers. Appliances that no longer qualify for use in customer households are temporarily stored and, if necessary, sold to secondary recyclers or disposed of properly. No appliances were handed over to secondary recyclers for resale in the reporting period. However, 443,428 DVB-C receivers and 101,986 smartcards were sent for qualified disposal in 2023. The total weight was around 224 tonnes. Recycling was carried out in accordance with the law on the placing on the market, take-back and environmentally sound disposal of electrical and electronic equipment. [GRI 301-3, GRI 306-3]

The Logistics team in the Facility & Logistics department is responsible for reporting the Group-wide figures.

High reconditioning rates cannot be attained with the technical components in our distribution networks. Defective components are repaired by the manufacturer within the warranty periods and returned to use as spare parts. Otherwise, the service lives of the technical equipment calculated by the manufacturers are fully utilised wherever possible. In order to safeguard the greatest possible reliability in supply, we do not purchase reconditioned hardware. [GRI 306-1, GRI 306-2, GRI 305-3]

	2021	2022	2023
Modems ¹	57,188	36,391	39,899
DVB-C receivers	4,614	-	13,927
CI+ modules	2,866	-	-
Smartcards	24,253	13,646	9,039
Hard drives	-	-	644
Remote controls	1,984	328	2,120
Adapters	56,313	40,210	32,168
Connecting cables	93,930	119,799	88,785
Attachment adapters	-	800	33,497
Total parts	243,169	211,175	222,641

¹ Number of units for reprocessing

4.4. Material purchasing

Tele Columbus Group purchased new hardware for its end customers business in 2022. Cradle-to-gate CO_{2e} emissions caused by the manufacturing process are reported in the carbon footprint. This is within the remit of the Procurement department.

The successful implementation of our fibre strategy is evidenced by the quantities of cable procured: Almost 440 kilometres of cable material were purchased for the modernisation of our networks and for the fibre optic expansion agreed in many locations. Fibre optics accounted for 86% of cable volumes. Civil engineering by third-party companies was considered the last major gap in Scope 3 reporting, which has now been closed by extrapolation. The calculation is based on the practical CO_{2e} factors “CO_{2e} savings in civil engineering for fibre optic cabling” in ITG Technical Report 307 (VDE Verlag). The civil engineering work required to expand the network contributes 525 tCO_{2e} to the carbon footprint.

The procurement of paper for correspondence and advertising materials was calculated at 141 tCO_{2e}.

Overall, a comparison with previous years shows 10,344 tCO_{2e} (previous year: 11,164 tCO_{2e}) from the purchase of materials and hardware. A weight-based estimate was made for the purchase of network technology for 2023.

As a result, there was an increase in the upstream CO_{2e} by a further 232 tCO_{2e} to 10,718 tCO_{2e} by purchasing materials.

4.5. Logistics and postal communication

The supply of goods, delivery of customer hardware, posting advertising mail shots and our written correspondence resulted in 462 tCO_{2e} (TTW).

This includes 26 tCO_{2e} (previous year: 14.7t) caused by cargo and freight forwarding as reported by the Facility & Logistics department. The calculation was carried out by the Sustainability team using software in accordance with ISO 14083:2023 (OPS). [GRI 305-1]

The shipment of packages and letters contributed 436 tCO_{2e}. The majority of the letter mail volume had to be estimated this year. Intensive marketing activities resulted in considerable additional volumes, which were sent via numerous service providers. The CO_{2e} factors are taken from a WIK discussion paper on climate-neutral postal services¹. According to the assumptions, the significant increase in CO_{2e} due to postal dispatch is proportional to the increase in dispatch volumes. [GRI 305-1, GRI 305-2, GRI 305-3]

The main volume of letter deliveries is attributable to the Campaigning team in the Products & Growth department. CO_{2e} from printing services is still offset through the print service providers engaged by the Group. Going forward, it will be possible to offset CO_{2e} through external partners. [GRI 305-1, GRI 305-2, GRI 305-3]

4.6. Product usage

The use of our products results in the hardware we provide consuming energy in customer households. These hardware elements include routers, cable modems, WiFi extenders for telephone and internet services as well as DVB receivers or more simple set-top boxes and CI+ modules used to receive digital television.

The calculations in this regard are based on the assumption that a modem is always operational. Data on the average amount of time spent watching TV each day per household was obtained from an online study conducted by ARD/ZDF². The remainder of the 24-hour period was included at the electricity consumption of the various hardware used by customers when in stand-by mode. So-called ONTs (Optical Net Termination) are also becoming increasingly important as part of the FTTH fibre optic expansion. They provide the transition from the network's light signals to the electrical signals that can be processed by the receivers and internet modems.

¹ <https://t.ly/jC5Ha>

² https://www.ard-zdf-onlinestudie.de/files/2023/MP_24_2023_Onlinestudie_2023_Bewegtbild_final.pdf P.4

We assume constant operating current consumption in this case. The assumed CO_{2e} factor per kilowatt hour corresponds to the average value of 434 g/kWh calculated by the Federal Environment Agency. [GRI 305-1, GRI 305-2, GRI 305-3]

Terminal equipment in the field is provided by the Equipment Procurement & Logistics team. Calculations relating to use periods and power consumptions were made by the Sustainability team in the Corporate Communications department. As a result, total emissions amounted to 27,475 tCO_{2e}. A decrease of 10% compared to the previous year. [GRI 305-1, GRI 305-2, GRI 305-3]

4.7. Water and wastewater

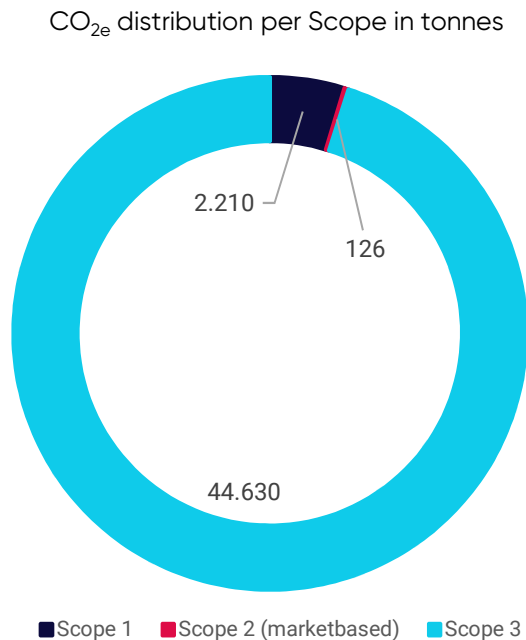
No water is used in the sense of production-related consumption. Instead, water consumption is limited to the normal extent occurring in an office environment. Hazardous waste is also not produced. [GRI 303-1, GRI 306-1, GRI 306-2]

4.8. Interventions in the ecosystem

The impact on the ecosystem is limited to civil engineering works as part of our business activities. When laying cables in green areas, the municipal requirements for the protection of ecologically sensitive areas are taken into account. All civil engineering works are subject to noise emissions and exhaust fumes. However, our construction measures are “mobile construction sites”, the location of which ordinarily moves by at least 50 metres every day, with few exceptions. Any potential disruption to affected residents is only short.

4.9. Carbon footprint

The carbon footprint is calculated on the basis of the GHG Protocol. All figures are rounded to tCO_{2e}. [GRI 305-1, GRI 305-2, GRI 305-3]



Scope 1	2021	2022	2023
Vehicle fleet	1,483 ¹	1,877 ¹	2,157
Calculated by external providers	435	68 ²	53 ²

¹ Calculated by external service providers, TTW analysis [GRI 305-1]

² Only self-procured heating energy

Scope 2	2021	2022	2023
Power procurement			
location-based	10,785 ³	12,556	13,440
market-based	70	43	126

³ 12,612 tCO_{2e}, taking into account the increased CO_{2e} factor per kWh in Germany's energy mix

Scope 3	2021	2022	2023
T&D line losses	560 ⁴	551 ⁴	555 ⁴
Business trips	42 ⁵	28 ⁵	164 ⁶
Staff commuting	-	319	301
Electricity used during remote working			104
Product use	25,194	30,696	27,475
Electricity used by on-premise distribution systems	-	3,868	3,923
Material purchasing	1,693	97	534
Hardware (network) purchasing			232 ⁷
Hardware (CPE) purchasing	17,933	11,067	9,811
Deep trench construction			525
Logistics / Mailings (paper)	249	193 ⁸	462 ⁸
Heating of rented properties	-	475	544
Offsets	-112	-77	-164

⁴ Defra, UK Conversion Factors on T&D losses

⁵ Offset through climate certificates

⁶ Flights and overnight stays in hotels

⁷ Weight-based estimation

¹⁰ CI+ modules were not included in this calculation

⁸ Letters, packages & CPE warehouse logistics [GRI 305-3]

Employees

A happy and motivated workforce forms the foundations for long-term success. The attractiveness of Tele Columbus as an employer is a key success factor for our company. The aim is to gain suitable employees for the Tele Columbus Group and retain them long-term by means of a positive company environment and good working conditions. Collaboration with the works councils and the Health and Safety Management team is another fundamental element that governs Tele Columbus' dealings with its employees.

The main employers within Tele Columbus AG are Tele Columbus Betriebs GmbH, Tele Columbus Vertriebs GmbH, Radio-, Fernseh- und Computertechnik GmbH (RFC for short) and HL komm Telekommunikations GmbH. An overview of the scope of consolidation of all associated companies and subsidiaries can be found in the combined management report.

	2020	2021	2022	2023
Incoming staff	194	187	210	250
Outgoing staff	148	160	204	241
Turnover rate	12.5%	13.1%	16.5%	19.2 %

5.1 Tele Columbus as an employer

As at 31 December 2023, the Tele Columbus Group counted 1,287 full-time equivalent employees among its workforce (previous year: 1,259). The workload was distributed among 1,380 (1,351) people. On the reporting date, there were also 117 external employees who are not our employees but who cover a broad range of topics. Essentially, these are activities that are carried out in an office environment. Only in very rare cases in the area of project management is the work additionally associated with travelling and field service activities. [GRI 2-8]

All employees with management responsibility have their primary residence in the Federal Republic of Germany. [GRI 202-2]

All personnel issues are managed at Group level by the Human Resources department, which reports directly to the Management Board. Contracts with external employees are managed by the legal department. [GRI 2-7]

As a modern employer, we allow our employees flexibility in structuring their own working hours.

Wherever possible, employees in all divisions have the option of setting their own clocking-on and clocking-off times within agreed time corridors. Work equipment is

almost entirely designed for working remotely. Tele Columbus has reached an agreement with the works council on remote work. The policies provide for a high degree of flexibility in the agreements between employees and superiors. At some business locations, remote working is already the predominant form of employment within the Tele Columbus Group.

5.2 Employer attractiveness

Surveys on job satisfaction have been conducted in annual employee surveys since 2018 with resulting measures being integrated into the capability, talent and people management programme. These measures are managed by the Human Resources department, which reports its results directly to the Chief Executive Officer. 66% of the workforce took part in the 2023 employee survey.

A total of 241 employees left our company in 2023. 250 new employees were recruited. Staff turnover will rise to 19.2% in 2023. Turnover is not unusual as a result of the comprehensive change in management and as part of a far-reaching change process. At 17.3%, staff turnover among employees aged between 30 and 50 and 16.4% among employees over 50 is moderate to low. At 38.3%, the highest turnover rate was again recorded among the under-30s. The gender balance of new hires remained almost unchanged, with 32% female and 68% male employees. This quite accurately maps the gender distribution within the total workforce of 68.2% male employees and 31.8% female employees. The workforce

is made up of employees from almost 40 nations. [GRI 401-1]

Employee satisfaction

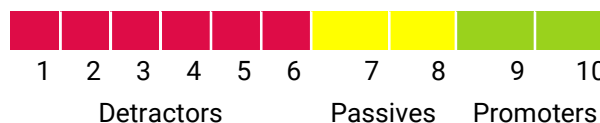
Employee satisfaction and leadership quality are particularly closely linked. At Tele Columbus, 360-degree feedback is used for directors and the management team as part of their bonus.

An employee net promoter score (eNPS) is calculated annually to assess the success of the measures in establishing an efficient employee structure. The eNPS was calculated for the first time as a baseline in 2018 within the scope of an employee survey. Progress since then has been recorded in surveys.

The eNPS recommendation score expresses whether people would recommend Tele Columbus Group to a friend or acquaintance as an employer. This KPI is part of our 2030 sustainability goals. The company aims to achieve a positive score that exceeds the current top levels in the industry. After consistent improvements in previous years, the score fell by 21 points in 2023. The overall index score across all questions (eNPS index) fell by seven points in 2023 compared to the previous year.

The deterioration in turnover and the recommendation score is due to the extensive change processes. Transparency about the challenges are rated positively, but result in uncertainty within the workforce. The drop in the recommendation score also reflects a psychological momentum that by far transcends employees' own job satisfaction.

NPS survey method



eNPS in pp	2020	2021	2022	2023
Change in eNPS	+16	+6	+12	-7
Recommendation rate	+29	+7	+8	-21

5.3 HR development

The oft-mentioned shortage of specialist staff is also apparent at Tele Columbus. For this reason, HR development is increasingly important in order to present employees with attractive employment and development prospects through targeted training.

All Tele Columbus employees take part in annual employee meetings in which target agreements are concluded. As part of the annual target agreements, individual training measures are integral to the discussions between employees and their line managers. [GRI 404-3]

In 2023, 1,514, members of staff took part in a range of elective training and in-service training courses (previous year: 2,948). As part of People and Talent

Management, expenses for external training and further education are covered and study holidays can be granted with a job guarantee. The number of training hours totalled 9,720 hours. All employees have the opportunity to take part in training measures. The rate of female participation in elective training courses was 44.4%. 55.6% of course participants were male. This means that female employees (31.8% of the workforce) showed a particularly strong interest in the training programmes.

In addition to the elective training courses, the entire workforce needs to complete mandatory annual online training modules with a test at the end on topics such as compliance, protection against corruption, fair competition, the principles of data protection, information security and safety in the workplace. Other modules are also available on data security when working from home and on the company's hygiene concept in the workplace. [GRI 403-5], GRI 404-2

Subjects such as the Group's policy on information classification and the new procurement policy were also addressed in mandatory job-related training courses in 2023. A total of 4,906 tests were passed successfully in the online modules. This meant that in excess of 4,458 hours spent training by employees. The gender distribution for mandatory online training is the same as the gender distribution for the workforce as a whole. In addition, there were 300 hours of classroom training about governance. A total of 14,478 hours of training in

turn works out at 11.6 hours of training per head. Training in the area of compliance is supplemented by various information offerings, some of which are low-threshold, such as a general policy consultation hour, articles and explanatory videos on the intranet and a dedicated intranet area with further information and supporting materials.

Mandatory instruction reached around 75% of the targeted groups. Compulsory training courses that have not been completed must be made up for. Catch-up dates have been set for 2024. [GRI 2-24, GRI 404-1]

Training	2021	2022	2023
Courses completed	5,355	17,627	5,574
Hours spent training	17,707	25,502	14,478
Hours of training per employee/year	13.25	22.2	11.6

Remuneration policy

The remuneration of the members of the highest executive body and of senior executives is subject to individual contractual arrangements. All these agreements have in common that they comprise a fixed and a variable remuneration component. [GRI 2-19]

Our employees are not subject to any centralised collective bargaining agreements. Nevertheless, there are numerous collective agreements in the companies of the Tele Columbus Group that contain provisions

regarding working hours, IT use, bonus components and fringe benefits. [GRI 2-30]

Remuneration is determined by the Management Board in close consultation with the works council. [GRI 2-20]

In principle, temporary and part-time employees have the same benefit entitlements as permanent employees on full-time contracts. [GRI 401-2]

The Group has no employees who are only paid the statutory minimum wage. Compliance with applicable minimum wage regulations is reviewed on a regular basis, but at least annually. [GRI 202-1]

No company pensions are currently agreed. However, the Group has entered into obligations under pension commitments that are measured in actuarial reports each year in accordance with the German Commercial Code (HGB), the tax accounts and IFRS.

The various pension obligations are covered by different reinsurance policies and any remaining gaps in cover are hedged against payment default. [GRI 201-3]

In the event of operational changes where the thresholds under the German Works Constitution Act (BetrVG, Section 111) are reached, an announcement is made via the employee representatives as soon as the details of such a change become sufficiently clear. [GRI 402-1]

5.4 Occupational health and safety

Preserving health, preventing work-related illness and creating safe working conditions are the aims of the safety and health management system implemented under the stewardship of the Human Resources department. [GRI 403-1].

Company safety officers, fire safety assistants and first aiders are designated at the necessary locations and trained in order to ensure safety in the workplace in the interest of optimum accident prevention as well as reducing the potential consequences of fires and accidents. An occupational safety committee is in place at all main company locations as per Section 11 Sentence 1 of the German Occupational Safety Act (ASiG). [GRI 403-8, GRI 403-4]

Occupational health care is provided by external service providers for health protection and occupational safety. All workers, including those who are not employees, are entitled to occupational medical care. These include consultants, self-employed people and freelancers whose work and/or workplace are influenced by Tele Columbus. [GRI 403-1, GRI 403-3]

Tele Columbus Group recorded six reportable work-related accidents in 2023. In terms of the number of

work-related accidents per 1,000 employees³, the accident rate was 5.1 (industry average: 15.94). The number of lost work days totalled 91 days. The number of work-related accidents per 1,000 employees and the number of lost working days per million hours worked (LTIFR) of 3.1 (industry average: 10.7) further verified the effectiveness of the occupational health and safety measures and preventative action taken within the Group. The figures for the industry average within the relevant trade association⁵ are noted in brackets. No work-related illnesses were identified.

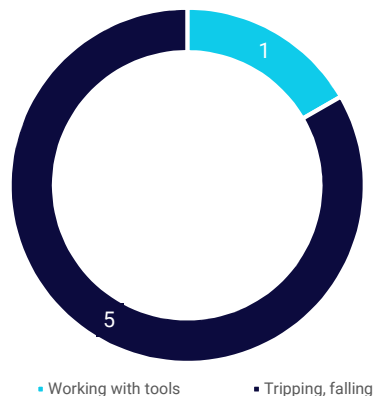
The company attempts to prevent health and safety incidents by offering annual occupation health and safety training (Section 12 of the German Occupational Health and Safety Act, ArbSchG) to all employees and providing eyesight check-ups as part of routine company medical care. The aim of these measures, and of safety inspections and ergonomic workplace design, is to minimise adverse effects on employee health and safety. [GRI 403-6, GRI 403-9]

Occupational safety briefings were held regularly at all locations during induction in 2023, and even on a monthly basis at many locations. These are repeated online on an annual basis using our digital training tool. These instructions are mandatory. [GRI 405-5]

³ Dormant work contracts were not included in the calculation of the company accident rate. The 1.000-Mann-Quote (TMQ) is comparable to the recordable injury rate (RIR).

Other regular measures include fire drills and workplace inspections as well as the annual electrical appliance test in accordance with DGUV.

Reasons for accidents



	2021	2022	2023
Accident rate per 1,000 employees	7.3	13.1	5.1
Lost work days	101	411	91
Lost work days LTIR (per 200k hours)	0.8	1.48	0.62
LTIFR (per 1 million hours)	4.1	7.4	3.1

⁴ Annual report BG ETEM 2022

⁵<https://www.dguv.de/de/zahlen-fakten/au-wu-geschehen/index.jsp>

When awarding contracts to external service providers, particularly for assembly and underground construction work, the relevant contracts include an obligation to comply with German accident prevention regulations and the German Employee Secondment Act (AEntG), as well as a separate agreement regarding adherence to the German Minimum Wage Act (MiLoG). [GRI 403-3, GRI 403-2, GRI 403-4, GRI 403-7]

In 2023, a steering committee for carrying out a psychological risk assessment began its work. Its task is to analyse the needs and existing risks as part of an employee survey, on the basis of which measures are to be derived. [GRI 403-2]

5.5 Collaboration with employee representatives

Numerous companies and locations of Tele Columbus AG have their own works councils. A Group works council is also in place. The works councils of Tele Columbus actively used their co-determination rights in 2023.

- Review of amended and new Group policies in coordination with the Chief Compliance Officer (throughout the year)
- Participation in the introduction of electronic driving licence checks (May)

- Conclusion of two general works agreements on the restructuring of the “Consumer” division (August)
- Conclusion of a general works agreement on the restructuring of the “Contact Centre” division at TC Vertriebs GmbH (August)
- New regulation of the Group works agreement “Mobile working” – up to 100% remote work possible (September)
- Conclusion of Group works agreement “Inflation adjustment 2023 in implementation 2024” (September)
- Involvement in the introduction of the digital whistle-blower process (November)
- Participation in the development of an employee survey to assess mental stress in the workplace 2023/2024 (December)

In addition, the works council critically monitored the introduction of new software throughout the year.

The relevant regulations for occupational health and safety, including the German Workplace Ordinance (ArbStättV) and the German Working Hours Act (ArbZG) are intended to ensure safety and a minimum standard of working conditions for all employees. Tele Columbus companies are committed to ensuring these rights. Further regulations are agreed with the responsible employee representatives by means of works agreements and semi-formal works agreements. Tele Columbus respects employees’ rights to organise themselves freely and negotiate collectively.

Works Council

Group works council of Tele Columbus AG

8 Mitglieder



January 2024



5.6 Diversity and equal opportunities

Tele Columbus regards itself as a diverse and cosmopolitan company. Tele Columbus signed the “Diversity Charter” back in 2008. Discrimination on the grounds of age, disability, origin, religion, ideology, gender or sexual orientation has no place at Tele Columbus. The Group is committed to non-discriminatory practices at our workplaces and promotes diversity throughout the entire organisation.

Responsibility for advancing the topics of diversity, inclusion and gender equality is an HR topic and, as such, lies with the Human Resources department, which reports directly to the Management Board. The HR department is supported in this endeavour by our Diversity Officer.

In 2023, cases of discrimination and personal attacks could be reported to the Head of the HR department, our

external ombudswoman, the compliance management team and our Diversity Officer. One case of discrimination was reported in 2023. However, at the request of the complaining employee, no further-reaching action was taken. [GRI 2-16, GRI 2-25]

No raised risk of discrimination was detected in the assessment of the upstream value chain. Consequently, Tele Columbus has not submitted an anti-discrimination concept regarding this.

Tele Columbus aims to increase the percentage of female employees and would like to see a greater number of women in management positions. This objective has now been made a sustainability goal. Tele Columbus will double the percentage of women in management positions by 2030 and intends to attract two female executives to the company. Due to the change in the organisational structure, this target will need to be amended, but at the end of the year no decisions had been taken in this regard. This strategic goal is now giving rise to a wide variety of measures and activities aimed at heightening awareness of the potential and benefits of diversity and inclusion for Tele Columbus within the workforce as a whole. Targeted



diversity training is included in the range of bookable modules available to managers.

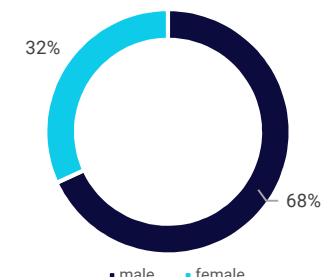
In addition to the women’s network “PŸUR Women”, which was founded by employees and sees itself as an independent addition to the works council, but also as a point of contact and catalyst for the HR department, the course was set in 2023 to establish a diversity council. The task of the diversity council is to develop and implement measures to promote diversity and inclusion at Tele Columbus Group’s management companies.

In 2023, the women’s network organised a week of action on gender equality to mark International Women’s Day. The event kicked off with a video statement by CEO Markus Oswald, who emphasised the importance of women in our company and called on managers to be particularly mindful of outdated prejudices. Female managers also reported on their own experiences and talked about women and careers in videos.

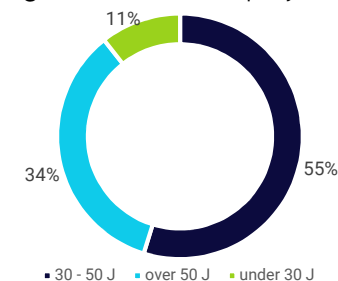
There was a change in the role of Diversity Officer in September 2023. The new Diversity Officer is committed to promoting the social, cultural and ethnic diversity of the Group. In addition to general representative tasks, he will take on and implement diversity projects within the company. Promoting diversity and inclusion is part of the job description, not a voluntary task.

Work/life balance is important to Tele Columbus. In 2023, 48 employees took parental leave. This points to a trend of more and more fathers making use of this entitlement. A total of 27 (previous year: 42) employees

Gender distribution of employees



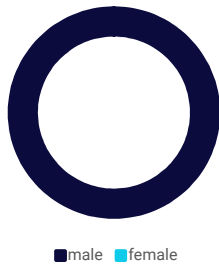
Age structure of employees



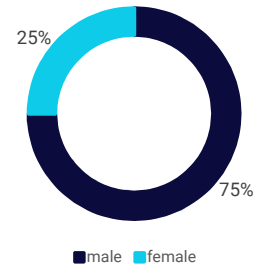
returned from parental leave in 2023. 101 employees returning from parental leave are still working for one of our companies after 12 months. [GRI 401-3]

At 94.7%, the vast majority of employment relationships are full-time contracts. As at 31 December 2023, the company had a total of 129 part-time agreements in place, predominantly with female employees, who accounted for a share of 75%. Nevertheless, there has

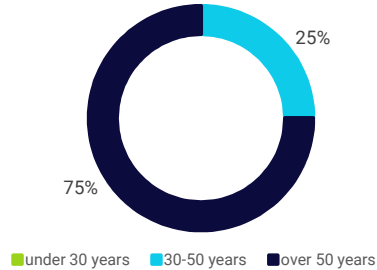
Gender distribution of the Management Board



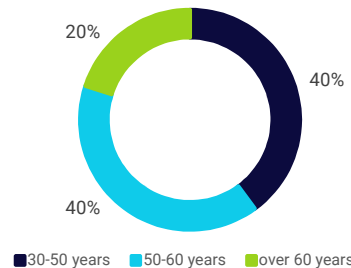
Gender distribution Supervisory Board



Age structure of the Management Board



Age structure of Supervisory Board



been a shift towards male employees. In 2020, 84% of part-time contracts were still held by female employees.

In addition to the possibility of mobile working, 339 employees have come to individual agreements regarding remote working or working from home (previous year: 310). [GRI 2-7]

As at the reporting date, the Group had 49 employees in a managerial role (previous year: 52). This figure

includes the Management Board and all department heads with a supervisory responsibility. The number of trainees and students at Group companies fell to 44 (previous year: 46). Tele Columbus employed 37 people with disabilities in the reporting year (previous year: 39).

The total workforce, excluding managers, consists of 68% male employees and 32% female employees. 10.6% are under 30 years old, 55.1% are between 30 and 50 years old and 34.3% are over 50 years old. Among the 175 employees with management responsibilities (CEO

0 to CEO -4), male employees dominate with 77.7%, while female managers account for 22.3%. One manager (0.6%) is under 30, the 30 to 50 age group accounts for 59.4% of the management team and 39.4% are over 50 [GRI 405-1]

If we compare the average basic remuneration of the respective hierarchy level of male and female employees with management tasks, women earn 98.1% of the average target salary at the CEO-2 management level, 92.4% at the CEO-3 level and 86.6% at the CEO-4 management level. The management level (CEO-1) was eliminated. There are no women on the Management Board as at 31 December 2023. Female employees without management responsibility earn 96.7% of the average target salary. [GRI 405-2]

It makes no sense to assess the fairness of pay at individual company locations because male and female employees do not work at the same levels of hierarchy at the smaller locations.

As the best-paid person at the company, the Chief Executive Officer of Tele Columbus AG earned 13.5 times the average salary of all other employees at the Group. The remuneration of the CEO was negotiated for the first time when he joined the company. The overall salary development of the workforce, excluding the highest-paid person in the company, increased by 11.7 percentage points year-on-year. [GRI 2-21] The Supervisory Board consisted of five members, including one woman. As at 31 December 2023, the four-member Management Board was all male and falls into the 30 to 50 and over 50 age categories. [GRI 405-1]

Compliance

Tele Columbus pursues the aim of complying with applicable laws and regulations to prevent fraud and corruption effectively.

In 2023, the role of Chief Compliance Officer was filled again. The Chief Compliance Officer reports to the CEO and is indirectly linked to the Supervisory Board and the Audit Committee. The Chief Compliance Officer is supported by the Legal department. Together, they create the legal and de facto organisational framework for managing and monitoring the company to the benefit of all relevant stakeholders. This includes adhering to laws and regulatory requirements, implementing management and control structures and managing the company in a responsible, qualified and transparent manner that is focused on long-term success.

The Chief Compliance Officer supports employees and company bodies in complying with legal provisions, regulatory standards and internal company policies. The Chief Compliance Officer reports to the Management Board and the Audit Committee on a quarterly basis about the status of the compliance management system and, if necessary, on an ad-hoc basis about significant events.

All of the company's main business locations were screened for corruption risks. No significant risks were determined. All our business premises are located in the Federal Republic of Germany. A review of location-based corruption risks was not conducted. [GRI 205-1]

Tele Columbus is further expanding its compliance management system in line with the relevant standards such as ISO 37301 and IDW PS980. The objective is to achieve a coherent overall system that addresses compliance risks and makes a significant contribution to meeting the organisational and compliance obligations of the bodies. The Chief Compliance Officer is supported by local compliance coordinators in the larger departments and subsidiaries.

The anti-corruption policies were brought to the attention of employees in corresponding training and information campaigns. Policies should be quickly accessible and easy to understand, which is why they are published in a central location on the intranet and are based on a similar structure. Training on subject matters involving high risk potential is rolled out as mandatory training, including training on the basics of compliance, protection against corruption, handling information and the fundamentals of data protection. Training courses are supplemented by various information offerings, some of which are low-threshold, such as a general policy clinic, articles and explanatory videos on the intranet and a dedicated intranet section with further information and related materials. New employees receive compliance training. In addition, training on protection against corruption is refreshed on an annual basis. Take-up for eLearning reached 75% in 2023. Classroom training covering the policy was rolled out in the period from November 2023 to March 2024, with take-up of 59% at the end of the year. Attendance is monitored and any missed training sessions have to be taken at a later point. The Chief Compliance Officer also

offers presentations and individual sessions for departments and teams in addition to providing advice on compliance issues to employees and executive bodies. The set of measures in place to detect possible compliance violations was supplemented by communication measures about the whistleblower process. In November, the ombudsperson was initially supplemented by a web-based whistleblower system and replaced at the turn of the year. The whistleblower process is accessible to both employees and external parties without restriction. The introduction was flanked by related communication measures. [GRI 2-25, GRI 2-26, GRI 205-2]

The rate of training taken by the Supervisory Board is 100%. The training courses were conducted by the majority shareholder in accordance with US requirements. Management received its training in 2023. Training for the new Management Board is slated for 2024. [GRI 2-17]

In the past, our compliance measures have predominantly been focused on our own employees. Expansion of these measures to the upstream and downstream value chains is also planned in light of the new German Supply Chain Act.

In 2023, our employees proactively approached our Compliance Officer to learn about our compliance policies and ensure that their conduct is in full compliance when dealing with outside parties as well as within the company.

One case of discrimination was reported to the diversity officers in 2023. The works council was informed. Further investigation into the incident was suspended at the request of the reporting employee. [GRI 216-1, GRI 406-1]

A Human Rights Board has been convened to prepare for the implementation of the Supply Chain Due Diligence Act. It is also to address reports of potential compliance violations as well as issues in implementing measures which are deemed to be necessary. The most senior body is the Compliance Committee, which consists of the CEO, the Chairman of the Group works council and directors from the Internal Audit, Human Resources and Legal departments. The committee's task is to identify compliance risks and review the measures already in place to reduce the respective risk and establish their effectiveness. [GRI 2-25]

In terms of governance, Tele Columbus Group is following the three lines of defence model. In 2023, the three lines were enhanced and their independence further boosted. This includes measures to expand the internal control system, enhance the expansion of specialist programmes in risk-exposed specialist areas and bolster the activities of the Internal Audit department.

The Supervisory Board consists, among others, of members nominated by the shareholders of Kublai GmbH, which is the majority shareholder, and appointed by the shareholders at the Annual General Meeting. The Supervisory Board's rules of procedure include provisions about potential conflicts of interest. The

Chairman of the Supervisory Board implements the required safeguards. [GRI 2-15]

6.1. Compliance cases 2023

In 2023, several employees contacted the Chief Compliance Officer and the ombudsperson. All reports were carefully reviewed in-house. No cases of corruption were determined. The Supervisory Board, management team and all employees are familiar with the measures introduced to combat corruption. [GRI 2-27, GRI 205-1, GRI 205-3, GRI 206-1]

6.2. Notes on political influence

Tele Columbus is involved in legislative consultation processes by invitation. We maintain memberships in interest groups and industry associations. These include ANGA – Association of German Cable Operators, BUGLAS – Association of Germany's Optical Fibre Industry, Breko – German Broadband Association, VATM – Association of Telecommunications and Value-Added Service Providers and other housing industry associations. As a rule, we do not make any donations to political parties or party-related foundations. [GRI 2-28, GRI 415-1]

6.3. Fair supply chains

From 1 January 2024, the Supply Chain Duty of Care Act applies to Tele Columbus Group. We are therefore

preparing the implementation of all due diligence obligations accordingly. In addition to the protection of human rights and compliance with environmental standards, we will also focus on fair competition. Our Supplier Code of Conduct (see <https://www.telecolumbus.com/unternehmen/lieferant-eninformation/>) outlines the expectations we have toward our business partners. The Supplier Code of Conduct on our website is available in German and English. Employees can find the internal Code of Conduct and a declaration of its importance signed by the Management Board on the intranet. [GRI 2-23]

In the Supplier Code of Conduct, our contractual partners undertake to comply with all applicable national and international laws, rules and regulations that are relevant to their business activities. This includes complying with laws governing human rights, occupational health and safety and the environment, as well as anti-corruption standards. The main laws and regulations include: Principles of the United Nations Global Compact, the rules of the UN Universal Declaration of Human Rights and respect for the fundamental principles and rights of workers in accordance with the International Labour Organization (ILO); Stockholm Convention on Persistent Organic Pollutants, Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal and the Minamata Convention on Mercury; United Nations (UN) and Organisation for Economic Cooperation and Development (OECD) conventions on combating corruption and relevant anti-corruption laws. This document, together with our general terms and conditions of purchase and individual contractual agreements, ensures fair working conditions and sustainable product purchasing. [GRI 2-24]

In the case of contracts awarded following a tender process, reviews were carried out in 2023 and information on environmental and social standards was requested. This review covered 6% of the net purchasing volume in 2023. In the course of the risk screening of our supplier countries, weaknesses were identified in the field of waste treatment. Tele Columbus will seek dialogue with potentially affected suppliers. [GRI 308-1, GRI 308-2, GRI 414-1]

Our anti-corruption policies have been shared with 10% of all suppliers. [GRI 205-2]

At 95%, the vast majority of the procurement budget is accounted for by suppliers from Germany. This means that the materials and services we use originate from our own sales and network distribution area. [GRI 204-1]

In addition to suppliers from Germany, Tele Columbus maintains direct international supplier relationships with companies within and outside the European Union. As part of a risk analysis for possible violations of the ILO core standards, an increased risk in the area of freedom of association and assembly was identified in three supplier countries. We are therefore preparing to obtain information and strengthen contractual agreements. [GRI 407-1, GRI 408-1, GRI 409-1] In 2023, we did not obtain substantiated knowledge of an infringement of one of the property rights from any of our direct or indirect suppliers. [GRI 308-1, GRI 308-2, GRI 414-2]

Monitoring supply chains is part of our ESG Strategy. By 2030, we aim to conduct a review process with all suppliers that together make up more than 90% of our

annual purchasing volume. In line with our risk-based approach, we will start with the suppliers with the highest turnover. This is within the remit of the Procurement department.

Facts and figures

EMPLOYEES		Unit	2018	2019	2020	2021	2022	2023
Total workforce	Number of FTE		-	-	1,203.8	1,243.5	1,259.2	1,287.7
Part-time employees	Number of people		-	-	103	111	128	129
Part-time female employees	Number of people		-	-	-	95	107	97
Part-time male employees	Number of people		-	-	-	16	21	32
Full-time employees	Number of people		-	-	-	1,041	1,042	1,064
Full-time female employees	Number of people		-	-	-	294	277	280
Full-time male employees	Number of people		-	-	-	747	765	784
Permanent employees	Number of people		-	-	-	1,163	1,166	1,187
Percentage of permanent employees	in %		-	96	95.6	95.2	94.6	94.7
Number of	Number of people		-	-	-	58	67	66
Percentage of	in %		-	4	4.4	4.8	5.4	5.3
Employees with disabilities	Number of people		-	44	43	41	39	37
Trainees and students	Number of people		-	-	13	44	46	44
Percentage of female employees	in %		-	-	33	33	33	32
Total number of employees at management level incl. Management Board CEO-0, Management CEO-1 and Head of Department CEO-2	Number of people		-	-	52	49	52	49

Facts and figures

Total wage gap between female and male employees: Percentage of the average target salary for female employees compared to the average target salary at the hierarchy level (CEO-2)	in %	-	-	95.8	97.7	96.2	98.1
Total wage gap between female and male employees: Percentage of the average target salary for female employees compared to the average target salary at the hierarchy level (CEO-3)	in %	-	-	89.6	94.4	89.5	92.4
Total wage gap between female and male employees: Percentage of the average target salary for female employees compared to the average target salary at the hierarchy level (CEO-4)	in %	-	-	86.9	90	82.9	86.6
Wage gap between female and male employees in the rest of the workforce: Percentage of the average target salary for female employees compared to the average target salary at the hierarchy level	in %	-	-	94.6	96.7	95.2	96.7
Incoming staff	Number	203	173	194	187	210	250
Outgoing staff	Number	247	147	148	160	204	241
Turnover rate	in %	14.7	12.25	12.5	13.1	16.5	19.2
Employees who have taken parental leave	Number	-	-	50	60	65	48
Employees who have returned to work and remain employed by the Group 12 months after coming back	in %	-	-	100	100	100	100

HEALTH PROTECTION AND OCCUPATIONAL SAFETY

	Unit	2018	2019	2020	2021	2022	2023
Occupational accident rate per 1,000 employees	in %	14.3	8.7	13.6	7.3	13.1	5.1
Lost work days	Days	-	-	259	101	411	91
Lost work days LTIR (per 200k hours)	in 200,000 hours	-	-	1.6	0.8	1.48	0.62
LTIFR (per 1 million hours)	in 1 million hours	-	-	8.1	4.1	7.4	3.1

EMPLOYEE REPRESENTATION

	Unit	2018	2019	2020	2021	2022	2023
Total number of works council committees	Number	-	-	17	17	19	18
Total number of works council members	Number	-	-	61	61	63	62

HR DEVELOPMENT

	Unit	2018	2019	2020	2021	2022	2023
Completed training measures	Number	-	3,728	7,920	5,355	17,627	6,420
Total hours spent training	Number of hours	-	-	7,906	17,707	25,502	14,478
Hours of training per employee/year	Number of hours	-	-	6.7	13.25	22.2	11.5
Participants in elective training and in-service training <small>Each employee may have taken several courses</small>	Number of participants	-	-	-	1,530	2,948	1,514
Hours spent completing elective training and in-service training	Number of hours	-	-	4,703	15,786	18,596	9,720
Hours spent completing mandatory training	Number of hours	-	-	3,203	1,921	6,906	4,458
Completion rate for mandatory training	in %	-	-	88.3	76	77.3	75

EMISSIONS OVERVIEW

	Unit	2018	2019	2020	2021	2022	2023
Procurement	tCO _{2e}	-	-	-	19,626	11,164	10,718
Self-procured heating energy	tCO _{2e}	-	-	-	435	68	53
Self-procured heating energy	MWh	-	-	-	1,793	302	266
Power <small>Market-based power procurement, the strong reduction can be attributed to the increased procurement of green electricity</small>	tCO _{2e}	9,375	6,190	5,623	70	43	126
Vehicle fleet	tCO _{2e}	1,908	1,630	1,269	1,483	1,877	2,168
Business trips (flight and hotel)	tCO _{2e}	286	324	84	42	28	164¹
Logistics <small>Data incomplete</small>	tCO _{2e}	-	-	209	249	193	462
Product use	tCO _{2e}	-	-	22,840	25,193	30,696	27,475
Grid loss	tCO _{2e}	-	-	663	554	551	555

¹ flight 69.1t, hotel 95.1t

ENVIRONMENT

	Unit	2018	2019	2020	2021	2022	2023
ENERGY AND CO2E EMISSIONS							
Total power consumption	in MWh	32,570	30,538	29,515	29,466	29,337	30,968
thereof TC networks	in MWh	25,404	23,183	22,897	22,514	22,235	23,051
thereof HL komm network	in MWh	68	85	677	401	894	1,049
thereof HL komm technical facilities + Leipzig data centre	in MWh	7,166	7,257	5,701	5,112	4,943	5,286
thereof offices, shops	in MWh	-	-	1,030	1,066	1,028	1,582
Percentage of renewable energies	in %	-	-	66.7	99.4	99.7	99.1
Emissions from non-renewable energies	in tCO _{2e}	-	-	-	69.9	43.4	126

ENVIRONMENT		Unit	2018	2019	2020	2021	2022	2023
MOBILITY								
Car	Million kilometres		9.99	8.64	6.73	8.02	10.6	13.5
Car	tCO _{2e}		1,909	1,630	1,269	1,483	1,778	2,168
Car	gCO _{2e} /km		191	189	188	185	176	161
Aeroplane	Million kilometres		0.92	1.05	0.32	0.16	0.11	0.26
Aeroplane Offset through climate certificates since 2020	tCO _{2e}		286	324	84	42	28	69
Flight offsetting	in %		-	-	100	100	100	0
Train	Million kilometres		1.06	0.99	0.23	0.23	0.7	1.31
Train	tCO _{2e}		-	3.50	0.90	-	-	0

ENVIRONMENT		Unit	2018	2019	2020	2021	2022	2023
Transferred data volumes	Exabytes		-	-	0.84	1.03	1.21	1.65
Data volumes for each active connection per month	Gigabytes		-	-	138	142	155	251
Energy consumption	Terabytes in kWh		-	-	27.2	21.9	19	14.6
Scope 1+2 emissions	Terabyte in kg CO _{2e}		-	-	8.2	1.9	1.4	1.4
T&D line losses Defra, UK Conversion Factors on T&D losses for 2019 and 2021	tCO _{2e}		-	-	663	560	551	555

ENVIRONMENT		Unit	2018	2019	2020	2021	2022	2023
HARDWARE REFURBISHMENT DISPOSAL								
Refurbishment total parts <small>incl: Smartcards, power supply units, connection cables, remote controls</small>	Number	-	531,640	288,233	243,169	211,175	222,641	
Modems	Number	18,000	64,000	39,000	57,188	36,391	39,899	
DVB-C receivers	Number	27,800	42,000	18,000	4,616	-	13,927	
CI+ modules	Number	7,800	14,500	25,000	2,866	-	-	
Hard drives	Number	16	8,500	1,300	-	-	3,206	
Refurbishment rate	in %	-	-	70	70	>70	>85	
DISPOSAL								
CPE Tele Columbus	Number	-	-	-	0	0	545,395	
CPE PROCUREMENT								
Modems	Number	-	-	150,000	211,800	123,227	100,102	
DVB-C receivers	Number	-	-	26,000	10,000	-	-	
CI+ modules	Number	-	-	50,000	48,000	42,000	-	
Hard drives	Number	-	-	9,000	-	-	-	
Optical network terminals (ONT)	Number	-	-	-	14,686	36,935	31,116	
WiFi extenders	Number	-	-	-	7,800	4,608	4,032	

ENVIRONMENT

	Unit	2018	2019	2020	2021	2022	2023
LOGISTICS							
Total	tCO _{2e}	-	-	209	249	193	462
Cargo and freight forwarding	tCO _{2e}	-	-	-	26	15	26
Shipment of packages and letters	tCO _{2e}	-	-	-	26	23	76
Marketing mailings <small>Recorded separately from the shipment of packages and letters for the first time in 2021</small>	tCO _{2e}	-	-	-	198	155	360

ENVIRONMENT

	Unit	2018	2019	2020	2021	2022	2023
PRODUCT USE							
Total	tCO _{2e}				25,194	34,565	31,344
Energy consumption from product use by customers ⁶	tCO _{2e}	-	-	22,840	25,194	30,696	27,475
Energy consumption of on-premise distribution systems by housing industry	tCO _{2e}	-	-	-	-	3,869	3,869

⁶ https://www.ard-zdf-onlinestudie.de/files/2021/Beisch_Egger_Schaefer.pdf p. 6

Carbon footprint	Unit	2018	2019	2020	2021	2022	2023
Total SCOPE 1							
Vehicle fleet Calculated by external providers	tCO _{2e}	1,908	1,630	1,269	1,483	1,877	2,168
Calculated by external providers Value for 2022 only covers self-procured heating energy	tCO _{2e}	-	-	-	435	68	53
Total SCOPE 2							
Location-based power procurement	tCO _{2e}	15,440	14,470	10,217	10,785	12,556	13,440
Market-based power procurement The strong reduction can be attributed to the increased procurement of green electricity	tCO _{2e}	9,375	6,190	5,623	70	43	126
Total SCOPE 3							
T&D line losses Defra, UK Conversion Factors on T&D losses for 2019 and 2021	tCO _{2e}	-	-	663	554	551	555
Calculated by external providers procured externally	tCO _{2e}	-	-	-	-	475	544
Business trips Offset through climate certificates 2020-2022	tCO _{2e}	286	324	84	42	28	164
Trips taken by train	tCO _{2e}	-	4	1	-	-	-
Employees' commutes	tCO _{2e}	-	-	-	-	319	301
Electricity used during remote working	tCO _{2e}	-	-	-	-	95	104
Product use	tCO _{2e}	-	-	22,840	25,193	30,696	27,475
NE4 on-premise distribution systems	tCO _{2e}	-	-	-	-	3,868	3,868
Material and hardware purchasing	tCO _{2e}	-	-	13,843	19,626	11,164	10,718
Logistics	tCO _{2e}	-	-	209	249	193	462
CARBON OFFSET CERTIFICATES [GRI 305-5]	tCO _{2e}	-	-	-84	-112	-77	-164

References to GRI

GRI 201-1	4	GRI 2-22	9	GRI 3-1	6
GRI 201-2	10	GRI 2-23	35	GRI 3-2	6
GRI 201-3	29	GRI 2-24	3, 6, 9, 29, 35	GRI 3-3	6
GRI 201-4	4	GRI 2-25	32, 34, 35	GRI 401-1	28
GRI 202-1	29	GRI 2-26	34	GRI 401-2	29
GRI 202-2	27	GRI 2-27	35	GRI 401-3	32
GRI 203-1	4	GRI 2-28	35	GRI 402-1	29
GRI 203-2	13	GRI 2-29	12, 15, 18	GRI 403-1	29
GRI 204-1	14, 36	GRI 2-3	3	GRI 403-2	30
GRI 205-1	34, 35	GRI 2-30	29	GRI 403-3	29, 30
GRI 205-2	34, 36	GRI 2-4	3	GRI 403-4	29, 30
GRI 205-3	35	GRI 2-5	3	GRI 403-5	28
GRI 206-1	35	GRI 2-6	4	GRI 403-6	30
GRI 207-1	4	GRI 2-7	27, 33	GRI 403-7	30
GRI 207-2	4, 10	GRI 2-8	27	GRI 403-8	29
GRI 207-3	12, 18	GRI 2-9	7	GRI 403-9	30
GRI 207-4	4	GRI 301-3	23	GRI 404-1	29
GRI 2-1	3, 4	GRI 302-1	21	GRI 404-2	28
GRI 2-10	7	GRI 302-3	21	GRI 404-3	28
GRI 2-11	7	GRI 302-4	21, 22	GRI 405-1	33
GRI 2-12	7, 9	GRI 302-5	20	GRI 405-2	33
GRI 2-13	7	GRI 303-1	25	GRI 405-5	30
GRI 2-14	3, 7	GRI 305-1	19, 20, 21, 22, 23, 24, 25, 26	GRI 406-1	35
GRI 2-15	35	GRI 305-2	19, 20, 21, 22, 24, 25, 26	GRI 407-1	36
GRI 2-16	32	GRI 305-3	19, 20, 21, 22, 23, 24, 25, 26	GRI 408-1	36
GRI 216-1	35	GRI 305-4	21	GRI 409-1	36
GRI 2-17	9, 34	GRI 305-5	44	GRI 413-1	14
GRI 2-18	9, 10	GRI 306-1	23, 25	GRI 414-1	36
GRI 2-19	9, 29	GRI 306-2	23, 25	GRI 414-2	36
GRI 2-2	3, 33	GRI 306-3	21, 23	GRI 415-1	35
GRI 2-20	8, 29	GRI 308-1	36	GRI 418-1	14
GRI 2-21	33	GRI 308-2	36		

GRI Index

Statement of use	Tele Columbus AG has reported in accordance with the GRI Standards for the period January 1st - December 31st 2023.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	none

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
General disclosures					
GRI 2: General Disclosures 2021	2-1 Organizational details	p. 3, 4			
	2-2 Entities included in the organization's sustainability reporting	p. 3, 33			
	2-3 Reporting period, frequency and contact point	p. 3			
	2-4 Restatements of information	p. 3			
	2-5 External assurance	p. 3			
	2-6 Activities, value chain and other business relationships	p. 4			
	2-7 Employees	p. 27, 33			

	2-8 Workers who are not employees	p. 27			
	2-9 Governance structure and composition	p. 7			
	2-10 Nomination and selection of the highest governance body	p. 7			
	2-11 Chair of the highest governance body	p. 7			
	2-12 Role of the highest governance body in overseeing the management of impacts	p. 7, 9			
	2-13 Delegation of responsibility for managing impacts	p. 7			
	2-14 Role of the highest governance body in sustainability reporting	p. 3, 7			
	2-15 Conflicts of interest	p. 35			
	2-16 Communication of critical concerns	p. 32			
	2-17 Collective knowledge of the highest governance body	p. 9, 34			
	2-18 Evaluation of the performance of the highest governance body	p. 9, 10			
	2-19 Remuneration policies	p. 9, 29			
	2-20 Process to determine remuneration	p. 8, 29			
	2-21 Annual total compensation ratio	p. 33			
	2-22 Statement on sustainable development strategy	p. 9			
	2-23 Policy commitments	p. 35			
	2-24 Embedding policy commitments	p. 3, 6, 9, 29, 35			
2-25 Processes to remediate negative impacts	p. 32, 34, 35				
2-26 Mechanisms for seeking advice and raising concerns	p. 34				

	2-27 Compliance with laws and regulations	p. 35			
	2-28 Membership associations	p. 35			
	2-29 Approach to stakeholder engagement	p. 12, 15, 18			
	2-30 Collective bargaining agreements	p. 29			
Material topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	p. 6			
	3-2 List of material topics	p. 6			
Economic performance					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 6			
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	p. 4			
	201-2 Financial implications and other risks and opportunities due to climate change	p. 10			
	201-3 Defined benefit plan obligations and other retirement plans	p. 29			
	201-4 Financial assistance received from government	p. 4			
Market presence					
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	p. 29			
	202-2 Proportion of senior management hired from the local community	p. 27			
Indirect economic impacts					

GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	p. 4			
	203-2 Significant indirect economic impacts	p. 13			
Procurement practices					
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	p. 14, 36			
Anti-corruption					
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	p. 34, 35			
	205-2 Communication and training about anti-corruption policies and procedures	p. 34, 36			
	205-3 Confirmed incidents of corruption and actions taken	p. 35			
Anti-competitive behavior					
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	p. 35			
Tax					
GRI 207: Tax 2019	207-1 Approach to tax	p. 4			
	207-2 Tax governance, control, and risk management	p. 4, 10			
	207-3 Stakeholder engagement and management of concerns related to tax	p. 12, 18			
	207-4 Country-by-country reporting	p. 4			
Materials					
GRI 301: Materials 2016	301-1 Materials used by weight or volume			Not applicable	no manufacturing industry, no mail order business
	301-2 Recycled input materials used			Not applicable	no manufacturing industry, no mail order business
	301-3 Reclaimed products and their packaging materials	p. 23			

Energy					
GRI 302: Energy 2016	302-1 Energy consumption within the organization	p. 21			
	302-2 Energy consumption outside of the organization			Not applicable	Not relevant for corporate management and stakeholders. Quantities of energy, especially from the procurement of goods, can hardly be determined.
	302-3 Energy intensity	p. 21			
	302-4 Reduction of energy consumption	p. 21, 22			
	302-5 Reductions in energy requirements of products and services	p. 20			
Water and effluents					
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	p. 25			
	303-2 Management of water discharge-related impacts			Not applicable	Not material. Water withdrawals in the sense of production-related consumption do not occur. Consumption is limited to the ordinary to the normal water consumption of office space.
	303-3 Water withdrawal			Not applicable	see above
	303-4 Water discharge			Not applicable	see above
	303-5 Water consumption			Not applicable	see above
Biodiversity					
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas			Not applicable	Not applicable to operational sites.
	304-2 Significant impacts of activities, products and services on biodiversity			Not applicable	
	304-3 Habitats protected or restored			Not applicable	

	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations			Not applicable	
Emissions					
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	p. 19, 20, 21, 22, 23, 24, 25, 26			
	305-2 Energy indirect (Scope 2) GHG emissions	p. 19, 20, 21, 22, 24, 25, 26			
	305-3 Other indirect (Scope 3) GHG emissions	p. 19, 20, 21, 22, 23, 24, 25, 26			
	305-4 GHG emissions intensity	p. 21			
	305-5 Reduction of GHG emissions	p. 44			
	305-6 Emissions of ozone-depleting substances (ODS)			Not applicable	Not material.
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions			Not applicable	Since Tele Columbus is not a manufacturing company, waste is generated only in the course of office activities and determined as not material.
Waste					
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	p. 23, 25			
	306-2 Management of significant waste-related impacts	p. 23, 25			
	306-3 Waste generated	p. 21, 23			
	306-4 Waste diverted from disposal			Not applicable	Since Tele Columbus is not a manufacturing company, waste is generated only in the course of office activities and determined as not material.

	306-5 Waste directed to disposal			Not applicable	Appropriate, selectively additional waste, such as file disposal, electronic scrap and bulky waste is disposed of appropriately by waste disposal service providers.
Supplier environmental assessment					
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	p. 36			
	308-2 Negative environmental impacts in the supply chain and actions taken	p. 36			
Employment					
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	p. 28			
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	p. 29			
	401-3 Parental leave	p. 32			
Labor/management relations					
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	p. 29			
Occupational health and safety					
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	p. 29			
	403-2 Hazard identification, risk assessment, and incident investigation	p. 30			
	403-3 Occupational health services	p. 29, 30			
	403-4 Worker participation, consultation, and communication on occupational health and safety	p. 29, 30			

	403-5 Worker training on occupational health and safety	p. 28			
	403-6 Promotion of worker health	p. 30			
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	p. 30			
	403-8 Workers covered by an occupational health and safety management system	p. 29			
	403-9 Work-related injuries	p. 30			
	403-10 Work-related ill health				
Training and education					
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	p. 29			
	404-2 Programs for upgrading employee skills and transition assistance programs	p. 28			
	404-3 Percentage of employees receiving regular performance and career development reviews	p. 28			
Diversity and equal opportunity					
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	p. 33			
	405-2 Ratio of basic salary and remuneration of women to men	p. 33			
Non-discrimination					
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	p. 36			
Freedom of association and collective bargaining					

GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	p. 36			
Child labor					
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	p. 36			
Forced or compulsory labor					
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	p. 36			
Security practices					
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures			Not applicable	No security personnel.
Rights of indigenous peoples					
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples			Not applicable	Not applicable.
Local communities					
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	p. 14			
	413-2 Operations with significant actual and potential negative impacts on local communities			Not applicable	Not applicable.
Supplier social assessment					
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	p. 36			
	414-2 Negative social impacts in the supply chain and actions taken	p. 36			

Public policy					
GRI 415: Public Policy 2016	415-1 Political contributions	p. 35			
Customer health and safety					
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories			Not applicable	
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services			Not applicable	
Marketing and labeling					
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling			Not applicable	
	417-2 Incidents of non-compliance concerning product and service information and labeling			Not applicable	
	417-3 Incidents of non-compliance concerning marketing communications			Not applicable	
Customer privacy					
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	p. 14			

