

Declaration on Respecting Human Rights

Contents

Foreword	2
1. Our declaration of commitment.....	3
2. Expectations of our employees and suppliers.....	3
2.1 Human rights.....	4
2.2 Protection of the environment	5
2.3 Ethical business behaviour	5
3. Implementation of human rights and environmental due diligence obligations	6
3.1 Responsibilities	6
3.2 Risk analysis	6
3.3 Preventive measures	7
3.4 Remedial measures	7
3.5 Complaints procedure	8
3.6 Documentation, monitoring and reporting	8
3.7 Dealing with infringements.....	8
4. Our risk-based approach	8
4.1 Risk identification and assessment.....	8
4.2 Preventive measures	9
4.3 Dealing with identified risks.....	9
5. Concluding remarks.....	9

Foreword

We, the Tele Columbus Group, are one of the leading fibre-optic network operators and multimedia providers in Germany. With a reach of more than three million households, we offer high-speed internet including telephone, television and video on demand under the PŸUR brand. Together with our partners in the housing industry, we implement customised cooperation models and modern digital value-added services such as telemetry and tenant portals.

We are aware that our business activities can harbour risks for people and nature. At the same time, we regard respect for human rights as an important element of responsible corporate governance. Our aim is to ensure that human rights and environmental standards are respected within our own group of companies and by our suppliers and partners. We will endeavour to ensure compliance with human rights and environmental standards in the companies in our supply chain as well. The following statements describe our approach. More specific requirements can be found in our [Code of Conduct](#) for Employees of the Tele Columbus Group and in our [Supplier Code of Conduct](#). In our Sustainability Report, we present our activities in the areas of environment, social affairs and governance.

For us, responsible corporate governance means identifying important issues in dialogue with our internal and external stakeholders and further developing our processes, programmes and measures as a company. We are convinced that practising responsible corporate governance is an important building block of our long-term success. Each and every one of us is therefore encouraged to implement and further develop our principles in our day-to-day business.

Berlin, November 2025



Markus Oswald
CEO



Christian Biechteler
CSO HI&I



Jochen Busch
CCO

1. Our declaration of commitment

Tele Columbus AG recognises its responsibility for the consequences of corporate activities along the entire value chain. We are committed to respecting internationally recognised human rights and environmental standards, and to complying with applicable laws.

This declaration applies to Tele Columbus AG and its subsidiaries, Tele Columbus Netz GmbH - including RFC Radio, Fernsehen und Computertechnik GmbH and HLkomm Telekommunikations GmbH - as well as PYUR Vertrieb & Service GmbH.

Based on the United Nations Guiding Principles on Business and Human Rights, our business activities are aligned with the following international human rights and environmental standards:

- principles of the United Nations Global Compact, the rules of the UN Universal Declaration of Human Rights and the fundamental principles and rights of workers according to 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 Co-operation and Development (OECD) conventions on combating corruption and relevant anti-corruption laws.

We actively fulfil our human rights due diligence obligations. This means that we are committed to preventing and minimising negative impacts on human rights as far as possible in the course of our business activities. This responsibility applies to ourselves and also extends to our business partners, especially direct suppliers. We also expect all indirect suppliers to respect and promote human rights.

Sustainability is part of our corporate strategy and is therefore deeply embedded in our corporate culture. We believe that this is the foundation of our long-term success - together with our shareholders, suppliers, business partners and customers as well as our employees and social partners. The Executive Board is therefore committed to the following requirements for compliance with human rights.

2. Expectations of our employees and suppliers

Just as we as a company are committed to respecting human rights and environmental standards, we also expect our direct suppliers to respect human rights and protect the environment. We will ensure and promote this within the scope of our influence.

We have summarised the expectations for our employees, managers and board members of the Tele Columbus Group in our [Code of Conduct](#). We inform our suppliers about our expectations in our [Supplier Code of Conduct](#).

2.1 Human rights

We place particular importance to respecting human dignity, preventing discrimination and forced labour and ensuring fair working conditions.

Our principles are:

- **Prohibition of the worst forms of child labour:**
We completely reject the worst forms of child labour (slavery, prostitution, drug trafficking and all activities that impair the health, morals or safety of children) and do not tolerate them among our suppliers.
We are committed to complying with the ILO convention on the legal minimum age for employees. Under-18s do not perform night work or overtime and are protected from work that is harmful to their health, safety or development. The school attendance of young employees is not impaired.
- **Prohibition of forced labour, slavery and human trafficking**
We strictly reject any form of forced or compulsory labour, slavery or human trafficking. This includes the unacceptable treatment of employees through sexual or personal harassment, physical hardship, the withholding of identity documents or work permits, the making of deposits or the use of other coercive measures. Employees are free to terminate their employment relationship in compliance with the statutory notice periods.
- **Prohibition of discrimination and harassment**
We provide a work environment free of discrimination and harassment. We do not tolerate sexual harassment, sexual abuse, corporal punishment, physical or psychological coercion or verbal abuse, etc. No person may be disadvantaged, favoured or harassed on the basis of personal characteristics such as gender, skin colour, ethnic or social origin, language, religion or ideology, political or other convictions, age, sexual orientation and identity or other characteristics.
- **Health protection and occupational safety**
We comply with the ILO convention on the creation of a safe and healthy working environment through appropriate occupational health and safety measures. Hazards and the resulting health risks are appropriately assessed and the necessary protective measures are implemented for the best possible prevention of accidents and work-related illnesses. Employees are regularly instructed on general safety regulations in a form that they can understand, suitable work equipment and protective equipment as well as measures for emergency prevention and defence are provided.
- **Freedom of association and the right to collective bargaining**
We respect the right of employees to freedom of association, to join workers' organisations, to strike and to bargain collectively in accordance with the laws applicable to us under the ILO conventions.
- **Fair pay and working hours**
We comply with the applicable national legislation on working hours, remuneration, minimum wage and social benefits; we reject the payment of unequal remuneration for work of equal value. We also require this from our suppliers.
- **Preservation of the natural foundations of life**
We strictly avoid harmful soil changes, water pollution, excessive consumption of water, air pollution and harmful noise emissions that are likely to significantly impair the natural basis for the preservation and production of food, deny a person access to clean water, impede or destroy a person's access to sanitary facilities or harm a person's health.
Furthermore, we strictly prohibit any unlawful appropriation of land, forests and waters, the use of which secures a person's livelihood.
- **Use of security personnel**
We respect the observance of human rights when commissioning and using private or public security personnel to protect corporate projects. We avoid the risk of a violation of these principles due to a lack of instruction or control in the deployment of security personnel.

2.2 Protection of the environment

We act in an environmentally conscious manner in accordance with our [CSR and sustainability strategy](#). We therefore take measures to reduce the environmental impact of our business activities. This includes the economical use of resources, the reduction of negative effects on the environment during the manufacture and use of our products and the proper disposal of waste. This means:

- Responsible use of resources
We have implemented a responsible environmental strategy, including measures to conserve resources, reuse and recycle materials, avoid and reduce waste and emissions, etc.
- Compliance with environmental obligations
We consistently comply with environmental obligations relating to the use of mercury and mercury compounds in products/manufacturing processes as well as the appropriate handling of mercury waste (Minamata Convention), the use and disposal of persistent organic pollutants and the collection, storage and disposal of resulting waste (Stockholm Convention), or the transboundary movement of hazardous waste and its disposal (Basel Convention).
- We take appropriate measures to reduce CO₂ emissions in our own business operations and in the supply chain, in line with the goals of the United Nations Paris Climate Agreement.
- Transparency on greenhouse gas emissions
We are working towards ever greater transparency with regard to greenhouse gas emissions in our own value chain as well as in the upstream and downstream value chains.

2.3 Ethical business behaviour

Our reputation is a valuable asset to us, which is why we place great importance to ethically correct business behaviour in accordance with the relevant local, national and international laws and guidelines. These include, among others:

- Prohibition of corruption and bribery
We prohibit all forms of corruption, bribery, fraud, embezzlement, extortion, etc. Any improper granting of an advantage to an individual, a company or a public official with the aim of influencing a decision is strictly prohibited. This includes giving, offering, promising as well as accepting, offering and accepting promises - including via third parties. Advantages such as kick-backs, illegal payments, incentives, favours or other benefits may not be used, nor may bribes or facilitation payments.
- Invitations and gifts may also not be used to influence decisions. This applies both to invitations extended to our employees by suppliers and to invitations extended to third parties by us.
- Dealing with conflicts of interest
Decisions of the Tele Columbus Group are based exclusively on objective criteria. Conflicts of interest with private interests such as related parties or other employment or contractual relationships must be avoided or must be disclosed and eliminated.
- Fair competition
Compliance with the laws on fair competition, fair advertising and fair business practices is very important to us. We do not participate in agreements that violate antitrust laws, do not abuse a dominant market position and do not engage in other anti-competitive business practices. This also includes compliance with all applicable import and export regulations as well as economic sanctions and embargoes.
- Confidentiality and data protection
We comply with the laws and regulations on data protection and information security. The processing of personal data of employees, customers and business partners only takes place within the framework of the applicable legal requirements. The collection, storage, processing, transmission and disclosure of personal data is carried out in accordance with the applicable laws and regulations on data protection and information security as well as official regulations. Our

technical information systems are adequately secured against unauthorised access, cyber attacks, etc. and we ensure compliance with the usual standards.

3. Implementation of human rights and environmental due diligence obligations

The due diligence obligations are based on the above-mentioned standards and framework conditions. They are concretised in the Supply Chain Due Diligence Act (LkSG). We have implemented the due diligence obligations in the form of an LkSG Compliance Management System (LkSG-CMS), which consists of the following elements that build on each other:

3.1 Responsibilities

The Management Board of Tele Columbus AG bears overall responsibility for compliance with human rights and environmental due diligence obligations. The operational implementation in our own business operations is the responsibility of Human Resources and Corporate Social Responsibility (CSR), whereas Human Resources is responsible for the implementation of human rights-related duties and CSR is responsible for the implementation of environmental duties. The Procurement department is responsible for implementing due diligence obligations with our direct suppliers. The CSR department is responsible for reporting obligations and the Compliance department for the complaints procedure. The operational implementation is monitored by the Human Rights Officer, our Chief Compliance Officer. In addition, the effectiveness of the processes is reviewed by the Internal Audit. All operational units work closely together and are in regular dialogue regarding the implementation and monitoring of measures.

We are convinced that an effective LkSG CMS must be deeply embedded in the company's processes across all departments. We take this idea into account with our Human Rights Board. The Board consists of members from the aforementioned departments as well as representatives from the Legal & Regulatory division. The Board supports the Human Rights Officer in the monitoring and further development of the LkSG CMS and also serves as an escalation and decision-making body for specific issues. The Board meets quarterly and on an ad hoc basis if required.

The Executive Board is informed about the work of the Human Rights Officer and the status of the LkSG-CMS on a quarterly basis and, if necessary, on an ad hoc basis. The same applies to the Supervisory Board.

3.2 Risk analysis

To determine the human rights and environmental risks, we carry out an annual risk analysis for our own business division and our direct suppliers. If the risk situation in our own organisation or in our supply chain changes significantly or if we become aware of substantiated human rights violations at direct or indirect suppliers, an additional risk analysis is carried out on an ad hoc basis. The findings of the risk analysis are incorporated into our preventive and remedial measures and into our declaration of principles.

The risk analysis is carried out on the basis of a general risk catalogue with theoretical scenarios for risks specified by the LkSG. The theoretical risk catalogue is adapted to the actual risks for the Tele Columbus Group by divisional managers. The risk catalogue developed in this way is assessed in terms of the severity of the individual risks and this assessment is checked for plausibility by the Human Rights Board. The result is the risk inventory. The risk catalogue is reassessed annually and adjusted if necessary.

For our direct suppliers, the assessment of human rights and environmental risks is carried out in two steps: Based on the active direct suppliers in the selected period under review and the procurement volume, we determine the theoretical risk potential as part of the abstract analysis. We make an initial assessment of the risk potential based on the criteria of country and product or service type. For risk-exposed suppliers, a concrete risk analysis is carried out in a further step. The risk-exposed suppliers carry out a self-assessment using questionnaires. The results are supplemented with freely accessible

information from the media. If the risk assessment is confirmed, the human rights and environmental risks are evaluated from the perspective of those affected. We determine the severity (degree of impairment, number of people affected or the size of the affected environmental areas as well as the irreversibility) and the probability of occurrence of the risks and assess our contribution to the cause and our ability to influence the elimination or avoidance of risks. The Human Rights Board checks the plausibility of and monitors the assessment and the preventive and corrective measures based on it.

In addition to the regular risk analysis, an event-driven risk analysis may be necessary. The Human Rights Board decides on this. The procedure follows the same process of analysing the direct suppliers, but may relate to the corresponding change.

If we obtain substantiated knowledge of a human rights or environmental risk at an indirect supplier, we carry out a risk analysis in accordance with the process described. The Human Rights Board evaluates the findings and decides on further preventive or remedial measures and monitors their implementation.

3.3 Preventive measures

We want to work together with our suppliers on an equal basis to improve human rights and environmental standards. We implement appropriate preventive measures based on the findings of the risk analysis. We essentially use the following preventive measures:

- Procurement strategies and purchasing practices
We want to work with business partners who act with integrity. We therefore take human rights and environmental aspects into account when evaluating our direct suppliers as part of the selection process. The procurement strategies and purchasing practices implemented should help to prevent or minimise the risks identified.
- Communication & training
We sensitise our employees to the requirements of the LkSG and the underlying human rights and environmental standards through articles on the intranet, presentations and eLearning courses. All employees involved in LkSG-relevant processes also receive task-related training.
- Drafting contracts with direct suppliers
Our Supplier Code of Conduct formulates our expectations regarding the protection of human rights and compliance with environmental standards vis-à-vis our direct suppliers. With direct suppliers that have an increased human rights or environmental risk according to the risk analysis, we contractually agree the expectations for compliance with the human rights and environmental requirements of the suppliers as well as their appropriate addressing vis-à-vis their suppliers. In these cases, we also establish appropriate control mechanisms.

We will review the appropriateness and effectiveness of the selected measures at least once a year and, if necessary, on an ad hoc basis.

3.4 Remedial measures

If we determine that a supplier has violated or is about to violate human rights or environmental obligations, we will immediately take appropriate remedial action. These are case-specific actions. The aim of the measures is to prevent or end violations or to minimise the extent of the violation. If the supplier shows no willingness to remedy the violations or take appropriate measures after a reasonable period of time, we reserve the right, depending on the severity of the violation, to suspend the business relationship, refuse to accept deliveries as part of an order and/or return goods to the supplier until the violations have been demonstrably remedied. In particularly serious cases, we will consider terminating individual or all contractual relationships with the supplier for cause.

We will review the appropriateness and effectiveness of the selected measures at least once a year and, if necessary, on an ad hoc basis.

3.5 Complaints procedure

If a supplier, its employees or other affected parties suspect that human rights or environmental standards may have been violated in the course of the supply relationship, they can report it through our complaints procedure. Further information on the procedure and the tool can be found on our homepage:

[Speak. Freely.](https://www.telecolumbus.com/en/company/corporate-governance/reporting-system/)

(<https://www.telecolumbus.com/en/company/corporate-governance/reporting-system/>)

We will review the effectiveness of the complaints procedure at least once a year and, if necessary, on an ad hoc basis.

3.6 Documentation, monitoring and reporting

We document the implementation of our due diligence obligations in accordance with the LkSG on an ongoing basis. We review the effectiveness of the LkSG-CMS and the associated risk management at least once a year and on an ad hoc basis. From 2024, we will report annually to the Federal Office of Economics and Export Control on the fulfilment of our due diligence obligations and publish the report on our website.

3.7 Dealing with infringements

Reports of possible human rights violations can be made via the web-based complaint tool [Speak. Freely.](https://www.telecolumbus.com/en/company/corporate-governance/reporting-system/) (<https://www.telecolumbus.com/en/company/corporate-governance/reporting-system/>) in writing or as a voice message in several languages. This channel is available to employees and all external parties.

The Compliance team receives the report and initially checks its plausibility. If we have any questions to better understand the facts of the case, we will - if necessary and possible - ask the whistleblower. If the report is plausible and there is an initial suspicion of a violation of the laws, standards or guidelines mentioned, the team will initiate an investigation. The initial suspicion is dealt with in a corresponding investigation. The investigation is carried out according to defined standards, with the methods and scope being adapted to the individual case. In all investigations, the presumption of innocence applies to the person concerned until an offence has been proven. We value fair treatment, which is why we investigate with an open mind. This also means that we conduct investigations swiftly. As each case is individual, investigations can be completed in a few days or several months.

If the investigation leads us to the conclusion that a Tele Columbus Group company has violated human rights, we will immediately take appropriate measures to prevent the misconduct or violations. We will also consider labour law measures against the employees involved. If the violation was committed in a company in the supply chain, we will work with the company to negotiate a plan to prevent further violations and minimise the negative impact on those affected.

The measures to be taken and their implementation period depend on the case at hand and are based on the type and severity of the offence as well as on the perpetrator of the infringement in our own company or at a business partner.

4. Our risk-based approach

4.1 Risk identification and assessment

In order to better understand the human rights and environmental risks in our own company and in our supply chain, we carry out specific analyses at least once a year. Significant changes such as a change in legislation, the introduction of new products, projects or business areas would necessitate an ad hoc risk analysis. We carry out these analyses on a risk-oriented basis; we check suppliers with an increased human rights risk to see whether they themselves take measures to prevent, end and mitigate negative impacts on human rights in the context of their activities for us.

Based on the data collected, suppliers are categorised into three risk categories (low, medium and high). Important criteria for the categorisation are

- the nature and scope of the business activity and
- location of the supplier.

4.2 Preventive measures

The risk category determines the design of the preventive measures to be taken. The higher the risk, the more extensive the preventive measures. The guiding principle of our prevention measures is the further development of our suppliers. The specific measures depend on the following criteria:

- Our ability to influence the direct perpetrator of a human rights or environmental risk or the violation of a human rights or environmental obligation,
- the severity of the typically expected violation, the reversibility of the violation and the likelihood of a violation of human rights or environmental obligations occurring, and
- the nature of the company's causal contribution to the risk to human rights

4.3 Dealing with identified risks

As part of our risk analysis, we have not yet identified any human rights and environmental risks for the Tele Columbus Group in its own business area as significant. Therefore, there is initially no need for further action with regard to remedial measures in our own business area. We have not identified any significant risks with regard to our direct suppliers. Nevertheless, the abstract risk analysis revealed a fundamental exposure by country and type of product or service. We counter these risks by taking appropriate preventive measures for the suppliers concerned, such as adopting our Supplier Code of Conduct and answering questionnaires, which could result in further measures if necessary. Based on the information currently available, we have not identified any need for remedial measures.

5. Concluding remarks

The policy statement on respect for human rights summarises our approach to implementing the due diligence obligations under the LkSG. We have introduced appropriate processes to ensure compliance with the mandatory principles for respecting human rights and environmental standards along our supply chain. We review our processes and controls regularly and, if necessary, on an ad-hoc basis and update this policy statement as required.

Version 1.2 was released by the Management Board of the Tele Columbus Group on 15.11.2025.