

DECLARATION OF PRINCIPLES ON RESPECT FOR HUMAN RIGHTS

1 July 2024

1 Introduction

The CTS EVENTIM AG & Co. KGaA and all of its subsidiaries (hereinafter referred to as “EVENTIM”) acts based on trust, fairness and reliability. As an internationally operating group, respect for human rights is a fundamental part of the EVENTIM's corporate responsibility. This policy statement on respect for human rights incorporates and complements our policies in the CTS EVENTIM Code of Conduct. Our Code of Conduct is the basis of our actions and a binding framework for our employees. We as EVENTIM support our employees to act responsibly and with integrity.

Compliance with the law is a fundamental principle of responsible behaviour for us at EVENTIM. We respect the applicable legal obligations and requirements and act in accordance with ethical principles. Within this framework, we are committed to respecting the following international standards and principles:

- The Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The United Nations Guiding Principles on Business and Human Rights

This policy statement was adopted by EVENTIM's executive management and represents a binding basis for EVENTIM's human rights due diligence obligations in accordance with the German Supply Chain Due Diligence Act (LkSG).

2 Human rights

EVENTIM is particularly committed to protecting the following human rights in its own business activities and expects the same of its direct suppliers:

Prohibition of child labour: We at EVENTIM fundamentally reject any form of child labour. We respect the right to education and consider the minimum age for employment in accordance with national legislation and internationally recognised standards.

Prohibition of forced and compulsory labour: At EVENTIM, we reject all forms of forced and compulsory labour.

Right to health and safety in the workplace: Occupational health and safety is an essential prerequisite for our daily work at EVENTIM. Every employee promotes health and safety in their working environment and complies with the relevant regulations.

Equal opportunities and protection against discrimination: A culture of equal opportunities, mutual trust and mutual respect is essential for us at EVENTIM. We treat all employees, partners, and customers equally, regardless of national or ethnic origin, social origin, health status, disability, sexual orientation, age, gender, gender identity, political opinion, religious beliefs or other characteristics protected by law.

Remuneration and benefits: Remuneration and other benefits at EVENTIM correspond at least to the legal requirements of the respective country in which we operate with our companies and are

paid regularly. The remuneration paid should make it possible to finance a standard of living that secures the livelihood of all employees.

Employees Rights: We respect the rights of our employees according to the criteria of Human Rights and the ILO for freedom of association, collective bargaining, and strike in line with the respective local law.

Human rights and the environment: Environmental and climate protection are important business objectives for us at EVENTIM. We take responsibility for our environment: In all our business activities, we emphasise environmentally friendly, resource-conserving and energy-efficient product development, production, and transport. EVENTIM does not use any substances classified as hazardous under the LkSG, such as mercury and persistent organic substances.

Protection of local communities and indigenous peoples: At EVENTIM, we consider the local impact of our business activities and respect the rights of local communities and indigenous peoples.

Human rights protection when deploying security forces: If we at EVENTIM deploy private or public security forces to protect our operations, internationally recognised human rights must be respected. We at EVENTIM reject the use of private or public security forces for the purpose of torture, inhumane treatment or harm to life and limb.

3 Implementation of the due diligence obligations

3.1. Own business division and direct suppliers

3.1.1. Risk management and responsibility

We have established a risk management system to ensure compliance with due diligence obligations at EVENTIM and directly along our supply chain. The Group's Compliance Committee is responsible for risk management and its further development.

Every manager at EVENTIM is responsible for the fulfilment of human rights due diligence obligations in the relevant area. Managers are obliged to inform their employees about the contents of this policy statement.

3.1.2. Risk analysis

To determine the human rights and environmental risks at EVENTIM and its suppliers, we carry out an annual and ad hoc risk analysis. The initial step in the risk analysis process involves the identification and analysis of abstract risks using country indices and a business model risk categorisation. The subsequent step is the concrete assessment of the identified human rights and environmental risks, which is based on the criteria of scale, scope and remedies in accordance with the UN Guiding Principles. Measures already implemented are then reviewed and the probability of occurrence of the residual risk is assessed.

Through this analysis, we have identified certain topics within our own business that we want to prioritise. These include equal treatment in the workplace, occupational health and safety and environmental protection. The analysis of these key topics will form the basis for the development of preventive measures.

For our supply chain, we have analysed our supplier structure and identified high to medium potential risks related to occupational health and safety, working conditions, environmental risks, forced

eviction and misuse of authority by security forces. These risks were identified in part due to the country of operation of the suppliers and are mainly attributable to data gaps.

The results were communicated to the executive management of EVENTIM.

3.1.3. Preventive measures

Various measures have been implemented in the company to take preventative action against possible violations of human rights due diligence obligations. For our own business division, these include measures such as the implementation of human rights due diligence obligations as part of the procurement strategy and the implementation of a group-wide Code of Conduct. These include training in relevant business units.

Regarding our focus topics equal treatment in the workplace, awareness-raising measures are to be implemented. Furthermore, group-wide workplace safety training concepts are to be developed and existing environmental concepts are to be expanded to include other relevant environmental aspects.

Concerning our direct suppliers, human rights due diligence obligations are considered in the selection of suppliers as part of the preventive measures. Selected suppliers shall sign the

CTS EVENTIM Supplier Code of Conduct prior to commencement and in the case of existing cooperation. Prioritised suppliers with a higher risk profile will be asked to fulfil a questionnaire to determine whether and to what extent the human rights risks potentially occur. Further measures are derived from the results of the questionnaires.

The preventive measures are evaluated annually and checked for their effectiveness.

3.1.4. Remedial measures

If we become aware that a breach of due diligence or a violation of human rights has already occurred at EVENTIM or at one of our suppliers, we will endeavour to put an end to it by taking appropriate remedial measures.

If the violations occur in a supplier's area of responsibility, we have clear expectations of our suppliers: consistent and swift clarification, strong cooperation with EVENTIM and rigorous efforts to overcome the respective grievances.

If clarification and remedial action in the supplier's area of responsibility are not carried out with the necessary consistency and the violations are of a corresponding degree of severity, we will immediately examine and initiate a possible change of supplier, taking into account the framework conditions set by § 7 Section 3 (1) to (3) LkSG.

EVENTIM has established investigation procedures and corresponding measures. Our remedial measures are subject to an annual, risk-oriented review regarding their effectiveness. In this context, EVENTIM takes account of any risk changes that have occurred in its own business operations or at its suppliers.

3.1.5. Complaints procedure

Information on human rights and environmental risks or violations within EVENTIM's own business activities, as well as the business activities of our suppliers, can be reported via our complaints procedure:

<https://eu.deloitte-halo.com/CTSEVENTIMComplianceHelpline/?Pg=1&Lang=en-US>.

The complaints procedure guarantees impartial, independent, and confidential action.

In addition to this channel, employees are also free to contact the local HR or Compliance Responsible or the EVENTIM Compliance Officer globally.

The procedure for our complaints procedure is publicly available on our [website](#) and is also displayed in all our subsidiaries.

The complaints procedure is evaluated annually and checked for effectiveness.

3.2. Indirect suppliers

At EVENTIM, we work to identify our indirect suppliers to fulfil our responsibility.

If EVENTIM has significant indications that a violation of a human rights-related or environmental obligation by indirect suppliers is possible, EVENTIM will immediately carry out a risk analysis. Based on this analysis, a concept for prevention, termination or minimization will be developed at the originator.

4 Documentation, auditing and review reporting

We publish our report on the fulfilment of human rights due diligence obligations in accordance with the LkSG annually on our company website. This report is also submitted to BAFA for review.

5 Communication

This policy statement will be made available to all our employees and their representatives in an appropriate form and published as well as to suppliers and business partners.

We are aware that the implementation of human rights due diligence is a continuous process which we continuously review for changing conditions. This policy statement is regularly updated and further developed.

6 Contact

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