

# GENERAL INFORMATION

## Overview of Sustainability Management and the Sustainability Report

This section provides an overview of how sustainability topics are managed at United Internet by first of all describing the basis of preparation for this Sustainability Report. It explains the division of responsibilities between the management and supervisory bodies, the departments, and Sustainability Management. In addition, sustainability topics are put in the context of the corporate strategy and the business models.

### Basis of Preparation of the Sustainability Report


United Internet’s Sustainability Report has been prepared on a consolidated basis. It provides a holistic reflection of the Group’s practices and obligations including all segments, locations, and subsidiaries in which the Group holds a majority interest. Where individual disclosures do not yet apply to all companies, locations, and areas covered by this report, this is indicated. All subsidiaries without exception are included in consolidated sustainability reporting so as to ensure the transparency and comprehensibility of the sustainability activities.


When performing its double materiality assessment and when collecting data, United Internet took into account material sustainability matters in both the upstream and the downstream value chain extending over the purchase and trading of hardware, the provision of IT infrastructure, and digital services. United Internet procures IT hardware and other necessary wholesale services, which are often based on complex, multistage process chains, from its upstream value chain. This goes back all the way to raw materials extraction. United Internet performs in-depth risk assessments on the human rights and environmental risks in its supply chain, especially in the case of electronic components that are sourced on the international markets.

With respect to downstream value creation, United Internet examines the sustainability dimensions relating to the transportation, use, and disposal of its products and services. The Company’s business model is characterized by long-term customer relationships, which are driven by subscription models and free accounts. These are based on a strong focus on data privacy and information security during the use phase. To conserve resources, United Internet cooperates with specialized partners to refurbish old IT devices so as to minimize the impacts on the environment.

Article 19a(3) and Article 29a(3) of Directive 2013/34/EU give undertakings an exemption option for the disclosure of impending developments or matters in the course of negotiation. United Internet hereby states that no affiliated undertakings made use of this exemption option during fiscal year 2024.

Where data collection for specific metrics and monetary amounts were associated with measurement uncertainties, e.g., where assumptions were made during the determination of metrics, this is disclosed directly in the context of the data concerned. This relates in particular to the calculation of the corporate carbon footprint (CCF), due among other things to the use of emission factors to calculate greenhouse gases.

 [Directive](#) on the annual financial statements.

 See “Methodology for Assessing and Calculating Greenhouse Gases: GHG Protocol” on page 40.

Since no comparative figures from previous periods were used for the fiscal year, no retrospective corrections needed to be made. An exception to this is the EU Taxonomy, where the figures for Activity CE1.2 Manufacture of electrical and electronic equipment were reported for the first time for fiscal year 2024 and retrospectively for fiscal year 2023. Equally, the determination of errors, discrepancies, or the impracticability of making adjustments do not play a role for fiscal year 2024. However, adjustments and comparative figures are to be supplied as from fiscal year 2025 so as to ensure transparency and comprehensibility.

The Separate Nonfinancial Group Report was prepared in accordance with sections 315c in conjunction with 289c to 289e of the German Commercial Code (Handelsgesetzbuch – HGB). This also includes the information contained in this nonfinancial reporting on compliance with the requirements of Article 8 of Regulation (EU) 2020/852 (hereinafter the “nonfinancial reporting”). The structure and presentation of the information is oriented on the European Sustainability Reporting Standards (ESRSs). This applies in particular to the following aspects of ESRS 1:

- Qualitative characteristics of information
- Double materiality as the basis for sustainability disclosures
- Due diligence
- Value chain
- Time horizons
- Preparation and presentation of sustainability information
- Structure of the Sustainability Report

Oriented on the approach taken in the ESRSs, the impacts, risks, and opportunities (or “IROs” for short) identified in the double materiality assessment serve as the starting point for identifying the material sustainability topics. Following this, qualitative and in individual cases also quantitative information is provided for these sustainability topics, also oriented on the ESRSs.

This report is guided in its selection of qualitative information by the idea of “policies, actions, and targets” as set out in ESRS 2. Furthermore, additional qualitative and quantitative information is provided where relevant and possible; where indicated separately, this was also determined in accordance with the ESRSs.

Since the reporting is merely oriented on the ESRS, no recognized framework within the meaning of section 315d of the HGB in conjunction with section 289d of the HGB was used from a formal perspective. The decision on the content of the reporting was made against the backdrop of current developments: the ongoing uncertainty regarding the implementation of the CSRD and hence also of the ESRSs into German law and the proposals announced by the EU for a significant reduction in the reporting obligations.

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In 2015, the United Nations General Assembly resolved the Agenda 2030, and by doing so set 17 global Sustainable Development Goals (SDGs) in the process. The SDGs describe the targets for socially, economically, and environmentally sustainable development. The core SDGs for United Internet as a whole are as follows:

<b>4</b> QUALITY EDUCATION 	Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.	<b>5</b> GENDER EQUALITY 	Achieve gender equality and empower all women and girls.
<b>8</b> DECENT WORK AND ECONOMIC GROWTH 	Promote permanent, inclusive, and sustainable economic growth, full and productive employment and decent work for all.	<b>9</b> INDUSTRY, INNOVATION AND INFRASTRUCTURE 	Build resilient infrastructure, promote inclusive and sustainable industrialization, and foster innovation.
<b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION 	Ensure sustainable consumption and production patterns.	<b>13</b> CLIMATE ACTION 	Take urgent action to combat climate change and its impacts.

## Overview of Policies and Guidelines

United Internet provides an overview of the internal policies and guidelines that aim to prevent, reduce, or remedy actual and potential impacts for those sustainability matters that have been identified as material. At the same time, the goal is to address and mitigate risks and leverage opportunities. The people responsible for implementing the policies and guidelines constantly monitor their effectiveness.

POLICY/GUIDELINES	DESCRIPTION	SCOPE OF APPLICATION	RESPONSIBILITY FOR IMPLEMENTATION	NATIONAL AND INTERNATIONAL STANDARDS AND LEGISLATION	AVAILABILITY
Compliance Guidelines	Description of the compliance management system (CMS) Determination of roles and responsibilities in the CMS Compliance monitoring	Group-wide	Corporate Compliance		Intranet
Data Privacy Policy	Ensuring a uniform level of data privacy at United Internet Compliance with the GDPR Personal data is processed on the basis of the objective of data minimization Personal data is processed on the basis of previously defined purposes Personal data is stored for as short a period as possible and for as long as necessary, etc.	Segment-specific	Law Enforcement Affairs & Privacy	General Data Protection Regulation (GDPR)	Intranet
Company Cars Policy	Rules for electrifying the vehicle fleet	Group-wide	Commercial Services		Intranet
Management Guidelines	Strengthening of responsible behavior by management and focus on role models and team culture			German Corporate Governance Code	
Code of Conduct for Business Partners	Requirements to be met by business partners: compliance, integrity, fair competition, information security and data privacy, and intellectual property Social and environmental due diligence requirements Environmental protection and climate change mitigation	Group-wide and segment-specific	Corporate Compliance and Corporate Procurement	UN Guiding Principles on Business and Human Rights	Company website
Policy Statement	Principles for respecting human rights and environmental due diligence obligations Risk assessment for own area of business Risk assessment for supply chain Preventive measures, remedies, and controls	Group-wide and segment-specific	Corporate Compliance	Universal Declaration of Human Rights, German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct	Company website

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Whistleblower Protection Policy	Information on how to submit whistleblower reports Description of reporting channels Protection for whistleblowers	Group-wide	Corporate Compliance	The German Whistleblower Protection Act (Hinweisgeberschutzgesetz – HinSchG) is the implementation into German law of the EU Whistleblowing Directive (EU Directive 2019/1937), German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG)	Intranet
Information Security Management System (ISMS)	Safeguarding the product environment against unauthorized access and misuse	Segment-specific	Group Information Security Officer (GISO) and Segment Information Security Officers (SISOs)	ISO 27001, BSI IT-Grundschutz, BSI C5	Intranet
Group Policy on the Deployment of Contract Workers	Ensuring an efficient decision-making and procurement process Determination of responsibilities Ensuring compliance with the law when deploying contract workers	Group-wide	Corporate Procurement	German Employee Leasing Act (Arbeitnehmerüberlassungsgesetz – AÜG)	Intranet
Group Policy on Device Use	Enabling long-term use, refurbishment, and recycling of internal hardware	Group-wide	Corporate IT Services		Intranet
Group Anti-corruption Policy	Rules for accepting and giving gifts and contributions, descriptions of type of gifts and contributions, impacts of breaches	Group-wide	Corporate Compliance	German Anti-corruption Act (Gesetz zur Bekämpfung der Korruption)	Intranet
Artificial Intelligence Guideline	Introduction of AI requirements analysis during procurement and development processes Ensuring release procedure for AI systems Establishment of training offerings to ensure adequate AI skills	Group-wide	Corporate Compliance, Corporate Privacy & Corporate Legal	Regulation (EU) 2024/1689 on artificial intelligence (AI Act)	Intranet
Guidelines for Implementing Supply Chain Due Diligence (SCDD)	Organizational structures and workflows for implementing the LkSG Clarity about governance structures Appropriate and effective implementation of due diligence obligations	Group-wide	Corporate Compliance	German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG)	Intranet

POLICY/GUIDELINES	DESCRIPTION	SCOPE OF APPLICATION	RESPONSIBILITY FOR IMPLEMENTATION	NATIONAL AND INTERNATIONAL STANDARDS AND LEGISLATION	AVAILABILITY
Editing Guidelines	Rules for editorial staff; these are made transparent for the public and published	Segment-specific			
Guidelines on Dealing with Reports of Compliance Violations and Conducting Internal Investigations	Legal basis for internal investigations Workflow for investigations Roles and responsibilities Rules of conduct for internal investigations	Group-wide	Corporate Compliance	German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG)	Intranet
Source to Contract Policy – S2C	Guidelines and principles for operational and strategic purchasing Tendering process Rules governing demand management, product group management, supplier management, and contract management	Segment-specific	Head of Source to Contract		Intranet
Code of Conduct for employees	Interacting with staff, interacting with customers, information handling, competition law and anti-corruption, conflicts of interest, protection of company property, communication, interacting with public authorities, and compliance at United Internet	Group-wide	Corporate Compliance	ILO labor and social standards UN Guiding Principles on Business and Human Rights German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG) German General Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz – AGG)	Intranet
Compensation Policy	Ensures comparable, legally compliant, and fair compensation	Group-wide	Corporate Compensation & Benefit		

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## General Business Conduct

United Internet's Management Board and Supervisory Board currently consist of a total of eight people: three Management Board members and five Supervisory Board members. There are no employee representatives on these bodies. Women account for 40 % of the Supervisory Board; there are no female members of the Management Board at present. All members of the supervisory body are independent.

### Requirements for the Composition of the Body as a Whole

In addition to the individual requirements to be met by Supervisory Board members, United Internet's Supervisory Board aims in accordance with section C.1 of the German Corporate Governance Code ("the Code") to meet the following goals for the composition of the body as a whole.

The members of the Supervisory Board must collectively have the knowledge, skills, and professional experience necessary for them to carry out their tasks as required. The Supervisory Board strives to ensure that the Supervisory Board as a whole covers the widest possible range of knowledge and experience relevant to the Company, and in particular that it meets the following requirements:

- In-depth knowledge and experience of the telecommunications and internet sector
- Expertise or experience from other sectors of the economy
- Entrepreneurial or operational experience
- At least one member of the Supervisory Board must have several years of operational experience working abroad or working for a company with international activities
- Expertise in sustainability issues of significance for the Company
- At least one member with expertise in the field of accounting, whereby such expertise in the field of accounting must consist of special knowledge and experience in the application of accounting principles and internal control and risk management systems, and must also apply to sustainability reporting
- At least one additional member with expertise in the field of auditing, whereby such expertise in the field of auditing must consist of special knowledge and experience in the field of auditing, and must also apply to the auditing of sustainability reporting
- Knowledge and experience of strategy development and implementation
- In-depth knowledge and experience of controlling and risk management
- Knowledge and experience of human resources planning and management
- In-depth knowledge and experience in the field of governance and compliance
- Expertise in the needs of capital market-oriented companies



See the [Reports](#) section of the United Internet website.

The Audit and Risk Committee is responsible for overseeing the IROs. At an operational level, the governance systems (other than their strategic orientation) are managed by the CFO, whereby the Supervisory Board has corresponding expertise. The management level is overseen both by the Supervisory Board and by the Audit and Risk Committee. This oversight is based on the statutory and other regulatory requirements, as is described in the Corporate Governance Statement and the Management Report. The information on the control system and governance procedures is contained in the marked passages of the (Group) Management Report and is also an integral part of this (Group) Sustainability Report. The integration of control systems and governance procedures with internal functions is also explained there in detail.

Processes have been implemented in recent years to determine corporate goals and targets with respect to sustainability matters. In this context, the Management Board has resolved Group-wide target approaches that are to be used as the basis for developing a sustainability strategy at Group level. The existence of sustainability-related skills both on the Supervisory Board and in the individual departments helps reduce material impacts and risks, identify opportunities, and drive forward sustainable developments.

United Internet's management and supervisory bodies are informed at regular meetings (at least four times a year) of material, sustainability-related IROs and associated policies, actions, metrics, and targets. The Supervisory Board is included in all important strategic decisions and takes sustainability matters into account when overseeing corporate strategy.

Sustainability-related topics, including material IROs, are discussed in depth in the bodies and are documented in the Report of the Supervisory Board. The Supervisory Board performs its oversight function conscientiously and is briefed regularly both directly by the relevant departments and by the Management Board. In particular, this also applies to the organizational structures and workflows and the individual degrees of target achievement.



See the [Reports](#) section of the United Internet website.

The incentive systems for United Internet's Management Board members integrate ESG criteria as a component of the short-term variable compensation. This is in line with the commitment to sustainability and was resolved for the first time by the Annual General Meeting in May 2021. The rule has been incorporated in new service contracts for Managing Board member since fiscal year 2022. The approach aims to promote sustainability-related goals in the Management Board's decision-making horizon and to promote a targeted commitment to sustainability. Detailed information on the structure of compensation for the Management Board and the Supervisory Board can be found in the Remuneration Report and the Company's Articles of Association, which are available on the Company's website.

## Due Diligence at United Internet

United Internet considers meeting its due diligence requirements in relation to sustainability issues to be a top priority, and ensures this via a clear organizational structure. The Group-wide Sustainability Management function coordinates implementation of the relevant processes and principles. Overarching principles are formulated at Group level. These include e.g., sourcing green electricity, plus human rights and environmental due diligence obligations. These core principles are being embedded in the segments' sustainability work in an iterative process, with the segment management board members being responsible for their concrete implementation and adaptation to specific issues, and for impacts in their business activities. The periodic reporting to the full Management Board and the inclusion of the Supervisory Board ensure the continuous oversight and promotion of sustainability efforts throughout the Group.



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## Risk Management and Internal Controls over Sustainability Reporting

The goal of the risk management and control systems (RMS and ICS) is to identify and limit risks at an early state. The RMS and the ICS have not yet been finally integrated with the sustainability reporting process. For this reason, no formal risks were identified for the sustainability reporting process for fiscal year 2024. The risk management and control system for sustainability reporting that is being established is based on the methodologies and processes used in the financial reporting systems. These are constantly being adapted to the changing framework and are being continuously enhanced.

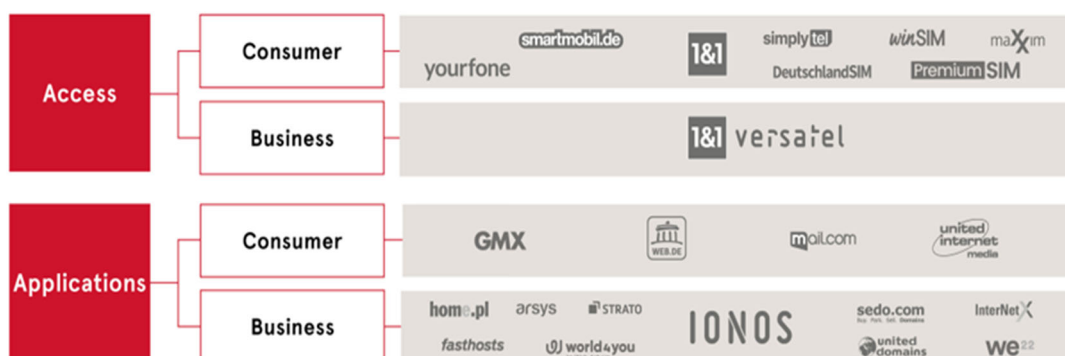
The Group's decentralized structure necessarily entails a high degree of complexity in some areas: Information for the Sustainability Report was collected bottom-up and consolidated for reporting by Corporate Sustainability. Clear, uniform processes were created to minimize risks. In addition, a regular dialog took place between the segments and departments supplying the information. Corporate Sustainability was responsible for process management.

## Business Model, Strategy, and Value Chain

### Our Business

United Internet is a leading European Internet specialist with roughly 29 million fee-based customer contracts and roughly 39 million ad-financed free accounts.

The Group's operating business is broken down into the Access Division, which comprises the Consumer Access and Business Access segments, and the Applications Division, which consists of the Consumer Applications and Business Applications segments.



### Consumer Access Segment

The Consumer Access Segment pools fixed-network broadband products (including associated applications such as home networking, online storage, smart home, IPTV, and video on demand) and mobile internet products for consumers. Customers are offered these internet access products on the basis of fixed monthly subscriptions (plus variable, usage-driven top-up fees).

United Internet's Consumer Access Segment is one of Germany's leading providers of **broadband products** (and particularly VDSL/vectoring and fiber-optic connections). The segment uses the Business Access Segment's fiber-optic network as a transportation network, accessing the last mile via city carriers

and Deutsche Telekom (primarily Layer 2) in the case of VDSL/vectoring and direct fiber-optic connections ("FTTH" = "fiber to the home").

United Internet is one of Germany's leading providers of **mobile internet products**. The segment has a fully functional mobile network that is being permanently expanded. The segment uses national roaming wherever it cannot yet offer adequate network coverage during the network expansion years. A national roaming partnership with Vodafone started at the end of August 2024. By the end of 2025, national roaming with Vodafone will be available for all of the segment's mobile customers. In parallel, the wholesale national roaming services that were previously sourced from Telefónica are being phased out completely.

Until the over 12 million customer contracts have been migrated in full to its own mobile network, the segment will also partly use the mobile network of Telefónica as a so-called Mobile Virtual Network Operator (MVNO) as well as MVNO capacities from Vodafone. Existing MVNO customers are being successively migrated to the segment's mobile network, a process that started at the beginning of fiscal year 2024. The migration is scheduled to be completed at the end of 2025.

The segment's mobile internet products are marketed via the Company's premium 1&1 brand and discount brands such as winSIM and yourfone, allowing it to offer the mobile communications market a comprehensive range of products and to address specific target groups.

## Business Access Segment

United Internet's Business Access Segment offers business customers a broad range of telecommunications products and solutions. The business model revolves around its operation of a modern fiber-optic network, which is more than 66,000 km long. This is one of the largest networks in Germany and is being continuously expanded. The segment uses the network to offer companies and public authorities telecommunications products ranging from standardized direct fiber-optic connections to customized, individual telecommunications solutions (voice, data, and network solutions). In addition, the segment's fiber-optic network is used to provide 1&1 DSL and FTTH connections and to connect antenna locations. In addition, (wholesale) infrastructure services are provided for national and international carriers.

## Consumer Applications Segment

The Consumer Applications Segment is home to United Internet's consumer applications. These primarily include personal information management applications (e-mails, to-do lists, and appointment/address management solutions), online (cloud) storage, and office applications. The portfolio has been successively expanded, and the Company's GMX and WEB.DE brands – which have been the largest consumer e-mail providers in Germany for many years – have been transformed in recent years into end-to-end hubs for user communications, information, and identity management.

The consumer applications are largely developed in-house and operated in the Group's own data centers. The products are offered as pay accounts or ad-financed free accounts. The latter are monetized using classic and increasingly also programmatic (i.e., data-driven) online advertising. Marketing is conducted by United Internet Media, a Group company. The segment is primarily active in Germany, Austria, and Switzerland with its ad-financed and fee-based consumer applications, and is one of the leading providers in the sector. The Company's mail.com brand internationalizes the business in the U.S.A., the United Kingdom, France, and Spain, among other places.

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## Business Applications Segment

United Internet's Business Applications Segment provides freelancers, self-employed professionals, and SMEs with internet-based business opportunities and helps them digitalize their processes. It does this by offering a wide range of high-performance applications such as domains, home pages, web hosting, servers, e-shops, group work, online storage (cloud storage), and office applications on a subscription basis. Cloud solutions and cloud infrastructure services are also offered. The applications are developed in the segment's own development centers or in cooperation with partner organizations.

The segment is also one of the leading players in the sector at an international level, with activities in a number of European countries (Germany, France, the United Kingdom, Spain, Portugal, Italy, the Netherlands, Austria, Poland, Hungary, Romania, Bulgaria, the Czech Republic, Slovakia, and Sweden) and North America (the U.S.A., Canada, and Mexico). The business applications are marketed to their specific target groups using the following Company brands: IONOS, Arsys, Fasthosts, home.pl, InterNetX, STRATO, united-domains, and World4You. In addition, the Sedo brand offers professional active domain management services, while the we22 brand supplies other hosting providers with a white-label website builder for creating high-end websites.

## Strategic Approaches

In fiscal year 2023, Group-wide target approaches for the material sustainability topics were developed and discussed together with the segments' sustainability management functions and the departments concerned. Based on these target approaches, the HR and Diversity departments developed policies at Group level in fiscal year 2024 to serve as guidelines for the strategies in the segments; the same also applies to key areas such as Governance (such as the Use of AI Policy). In addition, the whistleblower system was extended to offer separate reporting channels for misconduct both in the Company's own operations and for misconduct in relation to the value chain. A Group-wide e-learning anti-corruption course was also launched in fiscal year 2024. These policies are described in more detail in the topical chapters. Given the Group's decentralized organizational structure, the guidelines developed by the holding company (Corporate) serve as guidance for the segments. The segments are called on to include the central guidelines in their targets and to exceed their level of ambition.

Several segments built on the target approaches and guidelines mentioned to develop independent sustainability strategies in fiscal year 2024, including specific targets for their individual business models and the related products and services. These strategies comprise actions to promote environmental and social sustainability in the core products and services, in interaction with customers and stakeholders, and in the value chain. In fiscal year 2025, United Internet is aiming to consolidate the individual strategies so as to establish a uniform, Group-wide sustainability strategy that addresses, harmonizes, and further expands these issues.



See the [Reports](#) section of I&I's corporate website.

See the [Reports](#) section of IONOS's corporate website.

Additional details on the Consumer Access and Business Applications segments' sustainability strategies and targets can be found in the independent reports by the segments that are published at the same time as this Group Management Report. The sustainability strategy, targets, and actions for the Consumer Applications Segment are not currently published in a separate sustainability report. The targets and actions focus on the areas of climate and the environment, information security, digital responsibility, access to digitalization via the provision of e-mail and cloud services, and equal opportunities.

The Business Access Segment did not yet have a sustainability strategy or sustainability targets in the fiscal year. However, a large number of energy efficiency measures were implemented. In particular, the integrated environmental and energy management system that is being implemented lays the foundations for continuous improvements in the coming years. Going forward, this management system will be used to set sustainability targets, plan the associated actions and monitor their success.

Assessing the actual and potential impacts of United Internet's business activities and relationship on sustainability matters during the double materiality assessment is part of United Internet's ongoing strategy development. The Company endeavors to use this strategy process to identify material challenges, to put them in the context of their financial materiality, and to develop strategic focus areas and achieve sustainability targets on this basis.

## Interests and Views of Stakeholder Groups

United Internet's business depends on continuous dialog and successful cooperation with a wide range of stakeholders. Close contact with a range of stakeholder groups is particularly vital with respect to its impact on society and the environment, and for identifying material sustainability aspects during the double materiality assessment, developing the sustainability strategy, setting targets, and determining target achievement. United Internet is in dialog with stakeholders via a variety of different platforms and formats so as to further enhance communication and cooperation and take their interests into account:

- **Customers:** United Internet focuses systematically on customer needs and satisfaction, obtaining feedback in numerous areas. It also engages in an ongoing dialog with customers using surveys and during service calls, among other things. United Internet's products serve as an information platform, providing customers with internet access. In addition, the Company's portals offer specially prepared editorial content. A large proportion of the energy consumed on United Internet's platforms is due to customers using the Company's products. This means that their footprint is also influenced by United Internet's business decisions. In relation to access products, customers also benefit offered from the fact that United Internet makes the necessary hardware available; if this were not the case they would have to source this equipment themselves at higher cost and effort, and with a higher risk of technical complications.
- **Equity providers/shareholders:** Shareholders are an important stakeholder group for United Internet. Investor Relations and the Management Board are in regular contact with them during one-on-one discussions and road shows. Open, transparent reporting strengthens shareholder trust. Investors participate in United Internet's business success through the distribution of dividends and through share buy-backs.

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- **Debt capital providers/banks:** Another material stakeholder group in addition to the Company's shareholders are its debt capital providers. Corporate Finance engages in active dialog with debt capital providers so as to ensure adequate liquidity at all times and to guarantee the Group's financial independence. Group financing is primarily based on the operating units' strategic business plans. In line with this, United Internet monitors trends relating to financing options on the financial markets on an ongoing basis, so as to ensure adequate flexibility for additional growth. Sustainability criteria are playing an increasingly important role for debt capital providers, since they are included in risk assessments and can positively impact the terms and conditions for loans.
- **Employees:** United Internet's employees are the key to the Group's success. Only by leveraging their knowledge, skills, and dedication can United Internet continue to develop and to achieve long-term success. Since employee feedback is vital for United Internet, the Company regularly conducts surveys, uses these as the basis for defining measures to be taken, and then provides information on their implementation and the progress made within the Group. In addition, the Management Board uses a virtual format to engage directly with employees about specific issues.
- **Business partners:** United Internet's business requires it to work together with a large number of business partners and supplier companies. These include wholesale service partners, hardware suppliers, call center service providers, and shipping partners, for example. Personal discussions are one of the mechanisms used with these partners, while United Internet also supports call center service providers that are training workers.
- **Politicians and associations:** United Internet maintains a dialog with political decision-makers and government authorities so as to create a framework for a successful and responsible digital economy in Germany. One particular issue is ensuring competition, which acts as a driver for innovation, investment, and consumer benefits. This is why United Internet is a member of associations such as Bitkom<sup>1</sup>, BREKO<sup>2</sup>, the BVDW<sup>3</sup>, eco<sup>4</sup>, and the VATM<sup>5</sup>. In addition, individual departments play an active role in other relevant associations and bodies.
- **Nongovernmental organizations:** United Internet has worked with the United Nations' Children's Fund since 2006 in the United Internet for UNICEF foundation to collect donations and recruit new sustaining members.

<sup>1</sup> Bundesverband Informationswirtschaft, Telekommunikation und neue Medien e. V.

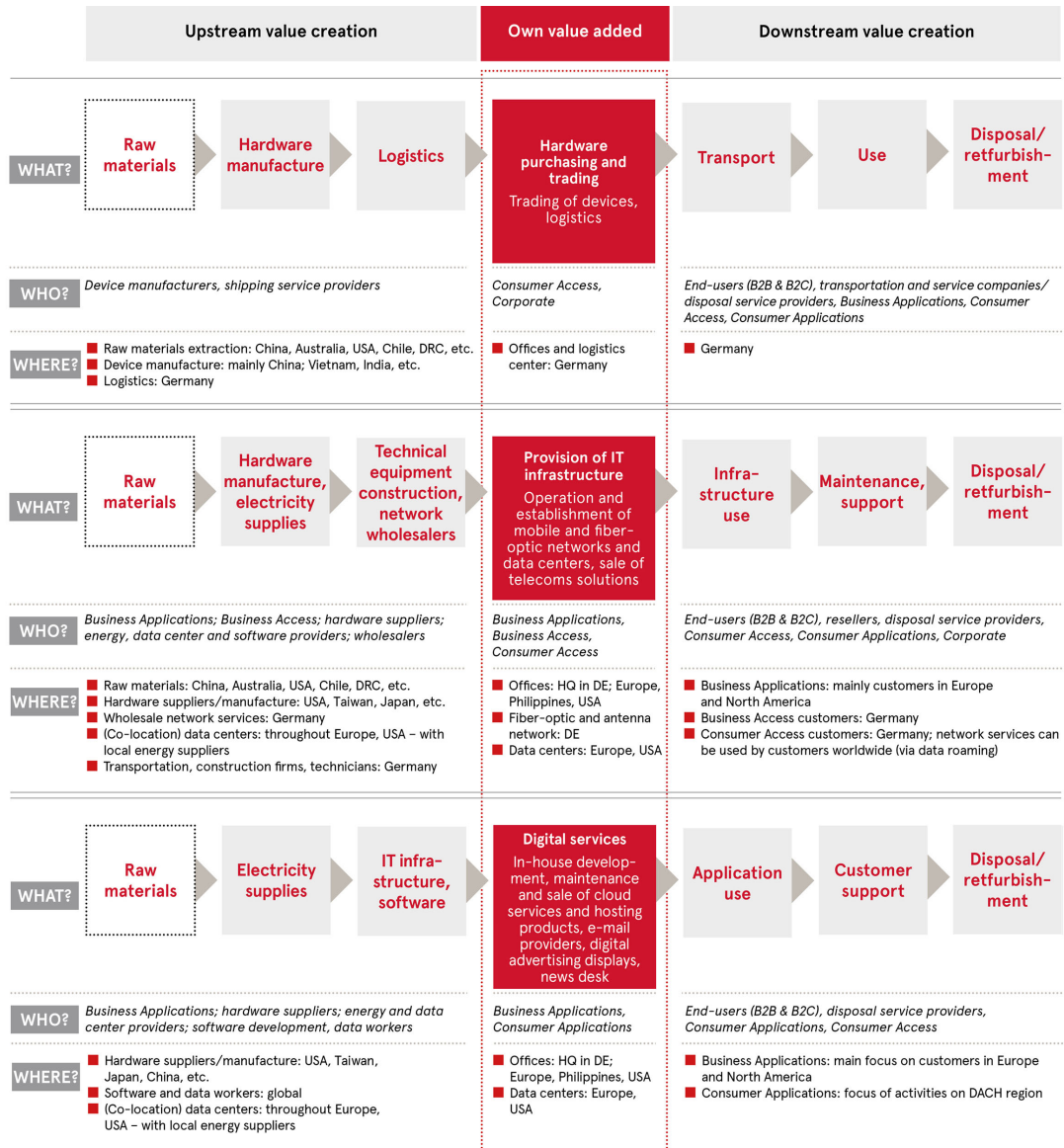
<sup>2</sup> Bundesverband Breitbandkommunikation e. V.

<sup>3</sup> Bundesverband Digitale Wirtschaft e. V.

<sup>4</sup> Verband der Internetwirtschaft e. V.

<sup>5</sup> Verband der Anbieter von Telekommunikations- und Mehrwertdiensten e. V.

## Value Chain and Business Model



The graphic shows United Internet's three material value chains: "Hardware purchasing and trading", "Provision of IT infrastructure," and "Digital services". These value chains are described individually in the following.

The "Hardware purchasing and trading" value chain is located in the Consumer Access Segment and in Corporate. Whereas Consumer Access serves consumers in Germany, Corporate is responsible for purchasing the equipment used by staff in the Business Applications and Consumer Applications segments.

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The upstream value chain for "Hardware purchasing and trading" primarily comprises device manufacturers such as Samsung, Apple, and Dell, which deliver smartphones and laptops in particular, and shipping service providers. Upstream of hardware manufacture is where the raw materials are extracted. These include oil for plastics production, aluminum, silicon, lithium, copper, and critical raw materials such as indium, light rare earths, and cobalt, which are primarily extracted in countries such as China, Australia, the U.S.A., Chile, and the Democratic Republic of the Congo. The devices themselves are mainly manufactured in Asian countries such as China, Vietnam, and India. The upstream logistics until the equipment reaches United Internet are global. United Internet's own value creation for "Hardware purchasing and trading" happens in Germany, as does its downstream value creation, which includes transportation to customers and the disposal and refurbishment of old equipment. The environmentally friendly disposal or refurbishment of devices and old IT equipment are significant environmental matters in downstream activities. United Internet's approach here is to cooperate with specialist business partners so as to minimize environmental impacts.

The "Provision of IT infrastructure" value chain is operated by the Business Applications, Business Access, and Consumer Access segments. Business Applications plays a special role here, since data center capacity that it provides within the Company is used by Consumer Access, Consumer Applications, and Corporate alike. Equally, Consumer Access also uses the Business Access telecommunications infrastructure, meaning that in this case the value chains between the two segments are superimposed.

The upstream "Provision of IT infrastructure" value chain contains the Business Applications and Business Access segments, plus hardware suppliers; energy, data center, and software providers; and other wholesale network partners. Upstream value creation includes construction of the fiber-optic and antenna networks, wholesale network services, and the manufacture of hardware equipment such as servers. Electricity supplies must also be included in this category. At the top of the value chain is the extraction of raw materials for the hardware required; this takes place in countries such as China, the U.S.A., Chile, and the Democratic Republic of the Congo, while the hardware is manufactured in the U.S.A., Taiwan, and Japan, among other places. In addition to the raw materials needed to manufacture devices, raw materials such as cement, quartz sand, copper, and steel are required for network construction. The wholesale network services are sourced from Germany, from Telefónica and Vodafone among other providers. Upstream data centers are located throughout Europe but also in the U.S.A.; these include both the third-party co-location data centers and the Business Applications data centers. Electricity for the data centers is generally supplied locally.

The Company's own value creation in the "Provision of IT infrastructure" area primarily takes place in Germany, since this is where the material office locations and the fiber-optic and antenna networks are located. In addition, there are a few offices in other European countries, the Philippines, and the U.S.A. Equally, data centers can be found in the U.S.A. and other European countries.

In principle, downstream value creation can happen anywhere in the world. However, most Business Applications customers are to be found in Europe and North America, whereas Business Access and Consumer Access customers are primarily located in Germany.

The third value chain, "Digital services," is provided by the Consumer Applications and Business Applications segments. In turn, Consumer Applications uses digital services supplied by Business Applications, which is why this segment is also to be found in the upstream value chain.



DACH: A German composite term for Germany, Austria, and Switzerland.

Upstream value creation includes the necessary IT infrastructure, which is supplied both by Business Applications and by co-location data centers. Raw materials extraction, hardware manufacture, and electricity supplies are similar to those in the "Provision of IT infrastructure" value chain. The same applies to the data centers and offices that form part of the Company's own value creation.

Whereas the Business Applications Segment primarily targets business customers in Europe and North America, Consumer Applications' activities are focused on the DACH area. However, in principle the digital services can be accessed and used worldwide.

Another United Internet value chain to date has been energy trading in the Consumer Applications Segment, which offers end customers electricity and gas contracts. New contracts relate solely to green electricity; however, a small number of gas contracts and a small percentage of gray electricity contracts are still in circulation. These activities account for less than 1% of Group revenue. The business area is to be discontinued or sold. For these reasons, energy trading has not been included in the presentation of the material value chains. Apart from energy trading in the Consumer Applications Segment, United Internet does not engage in any material activities in the fossil fuels sector or in the extraction, processing, or trading of coal and oil.

## Impact, Risk, and Opportunity Management

### Double Materiality Assessment



See [EFRAG](#), the European Financial Reporting Advisory Group

A double materiality assessment has been performed and published in the Sustainability Report annually since fiscal year 2022. The methodology for assessing material IROs has been continuously enhanced. In fiscal year 2024, materiality was determined at the level of the IROs oriented on the ESRs, the FAQs, and EFRAG's materiality assessment guidance. The IROs were identified on the basis of a long list that was drawn up using the ESRs topics, sub-topics, and sub-sub-topics (ESRS AR 16) plus entity-specific topics (including the segment topics). The entity-specific topics are derived from the double materiality assessments already performed in fiscal years 2022 and 2023. In the course of the current double materiality assessment, a review was also performed, and topics supplemented, on the basis of the Sustainability Accounting Standards Board (SASB) topic list, while new entity-specific topics such as addressing AI ethically were also added. The relevance of the topics for United Internet was assessed by examining their relationship to its business model, business activities, and value chain.

### Process for Determining and Assessing Material IROs ✓

#### Materiality Workshop

In 2024, Corporate Sustainability held a materiality workshop with the segments' sustainability management teams. The goal was to categorize all topics included in the long list on the basis of their relevance, and to provide reasons for this, while taking into account and analyzing the value chain. In addition, the workshop served to capture new IROs so as to be able to take them into account during assessment. One particular focus was on the geographical region and regulatory requirements (health and safety, working conditions, and pollution) at the Company's own locations, while another was on the areas of origin of purchased products and the raw materials needed for them. In addition, the downstream value chain (such as handling of electric waste) was examined. The core topic of "climate change" played a particular role here. In this context, collection and assessment of the IROs also included the results of the climate risk analysis and the corporate carbon footprint.




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Corporate Sustainability combined the IROs collected in the workshop with the IROs from the double materiality assessment from previous years in a consolidated list. The IROs were assigned to the relevant topics (sub-sub-topics) and the segments where this fitted their business model or upstream and downstream supply chain.

## Inclusion of Stakeholder Matters

Affected stakeholders were represented by Sustainability Management and the segment departments both for the identification of IROs and for their assessment. For example, the views of the Company’s own employees were included by representatives from the HR department. Customer viewpoints were covered by the Customer Experience and Legal departments and by Partner Management. A mapping table was drawn up to ensure that affected stakeholder groups were covered.

 See “Interests and Views of Stakeholder Groups” on page 16.

## Bottom-up Assessment of the IROs

After this, the IROs were assessed by Corporate Sustainability, the other segments’ sustainability managers, the stakeholders concerned or the departments representing them, and the risk owners in coordination with Risk Management. Impacts were assessed on a gross basis using the dimensions of scale, scope, irremediable character, and likelihood of occurrence. The severity, which is relevant for determining materiality, is the average of the scale, scope, and irremediable character. Risks and opportunities were also assessed on a gross basis using their financial scale and their likelihood of occurrence. The scales used at segment level were adapted in line with the scales used in classic risk management. Severe impacts were not prioritized.

The stakeholders performing the assessment were requested to take not only their own perspective but also publicly available studies into account.

## Consolidation

Following completion of the assessments by the individual segments, the outcomes were consolidated at Group level so as to determine the material IROs from the Group’s perspective. Impacts were consolidated by taking over the highest score from the segment assessments (gross assessment) as the figure for the Group. Risks and opportunities were added together, since the individual segment risks represent the total risk for the Group. The financial scale in euros was added up and reassessed using the scale for the Group as a whole. The likelihoods of occurrence were determined by calculating the average value and applying this at Group level.

## **Determination of the Materiality Threshold**

The materiality threshold at the IRO level is determined by individually examining the likelihood and the severity or financial scale. Actual impacts are an exception to this rule: in this case only the severity is taken into account. All IROs that were assessed as having a likelihood of occurrence of more than 35 % and that have a severity on the risk scale of more than 3 (as for the financial scale for risks and opportunities) were classified as material. In addition, IROs for which at least one criterion was assessed as having a severity of 5 (as for the financial scale) were examined individually for materiality by Corporate Sustainability. Equally, human rights-related impacts were explicitly examined. Where the severity was below the materiality threshold, the impacts were assessed for materiality by Corporate Sustainability as part of the individual examination.

## **Additional Information on Double Materiality Assessment**

It is planned to transfer the double materiality assessment to Group Risk Management in the first half of 2025, enabling even tighter integration with the existing risk management and due diligence process.

Where discrepancies with respect to the materiality assessment arose in the course of the process, these issues were discussed individually by the responsible staff at the segments or departments and Corporate Sustainability. The fact that Corporate Sustainability was responsible for overall management of the materiality process meant that consistency of assessment was assured by a central body.

The Risk Management team provided advice and support throughout the materiality assessment. The methodology used and the thresholds established were defined in close cooperation with the experts from Risk Management. In addition, the assessment of risks and opportunities was either performed by Risk Management together with the risk owners concerned or at least was checked by Risk Management. This practice ensures that the determination, assessment, and management of the IROs is effectively integrated with United Internet's general risk management process.

Where possible, quantitative data were used when assessing the IROs so as to get as close as possible to an objective assessment. Data sources here included, for example, the examination of the sales volumes for individual business activities, carbon emission figures (in the case of impacts on climate change), own calculations, and external studies.

The first double materiality assessment was performed in fiscal year 2022 and was reviewed for topicality in each of the years since then. The current double materiality assessment from fiscal year 2024 was the first whose methodology was based oriented on the requirements of the ESRs; as a result, it does not appear sensible to compare the results for this year with those for previous years due to the differences in the level of detail involved, among other things.

The results of the materiality assessment will be reviewed in the upcoming reporting cycle to determine whether they are up to date.

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### Material IROs and Their Interaction with Strategy and Business Model

The material IROs determined in the course of the double materiality assessment are described in greater detail in the following chapters of this Sustainability Report: “Climate Change Mitigation and Climate Change Adaptation,” “Resource Use and Circular Economy,” “Employees at United Internet,” “Workers in the Value Chain,” “Consumers and End-users at United Internet,” “Customer Orientation in the Business Customers Segment,” “Business Conduct,” and “Entity-specific Governance Topics: Digital Ethics and Responsibility.”

The following table summarizes the material IROs and shows where they come in the value chain.

Notes on interpreting the table:

The descriptions in the table are given on a gross basis. This means that IROs are assessed without taking any actions that have already been deployed into account. For example, potential risks are presented in their original, unmitigated form, without any risk reduction actions. This permits a comprehensive view of the maximum risks to which a company or an organization is exposed before any preventive or protective measures are taken into account.

Chapter	Name	Description	Up-stream	Own opera-tions	Down-stream
NEGATIVE IMPACTS					
Climate change	Energy requirements and greenhouse gas emission from United Internet's business model	<p>Providing internet and telecommunications services consumes energy and causes greenhouse gas emissions that negatively impact climate change.</p> <p>In the upstream supply chain, this particularly affects the expansion of the Company's own data centers and network infrastructure, plus purchased goods and services.</p> <p>Emissions occur in own operations as a result of the energy consumed by the Company's own data centers and mobile networks, and as a result of office buildings and employee mobility (commuting, business travel); in addition, coolant can escape as a result of leakages in data centers. Energy requirements are increasing overall, since data loads and the need for telecommunications services are continuing to increase.</p> <p>Downstream emissions result from the devices with which users access United Internet's services and from the shipping of IT hardware.</p>	x	x	x
Resource Use and Circular Economy	Increased extraction of raw materials and resource use for information and telecommunications technology	Greater need for information and telecommunications technology due to customer growth and increasing digitalization and data loads. Expansion (e.g., mobile network, additional server capacity) increases the need for, and extraction of, finite raw materials such as rare earths or metals.	x		
Employees at United Internet	Health risks in the workplace	Employees are exposed to a variety of stresses in the workplace, which can be both physical and psychological in nature. Excessive workloads, a poor work-life balance, and inadequate health and safety measures can increase stress and lead to physical and psychological illnesses. A lack of precautions and safety measures increases the risk of accidents and injuries at work. In addition, inappropriate behavior, physical assaults, mobbing, and harassment may lead to serious psychological stress up to and including an inability to work.		x	
Employees at United Internet	Human rights issues and unethical working conditions in own operations	Respecting workers' rights is essential for a fair, respectful working environment and for employees' psychological and physical health. Where workers' rights are not adequately protected there is a danger of inappropriate working conditions. The danger of labor rights and human rights issues occurring is particularly pronounced in locations with low human rights standards (child labor, forced labor), something that can impair the health of those affected. The protection of sensitive employee data (e.g., salary data) can also be endangered if the provisions governing this are not observed.		x	

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Employees at United Internet	Lack of equal treatment and inclusion	An inclusive corporate culture is decisive for promoting social justice and the well-being of all employees. A lack of awareness on the part of managers and employees leads to a wide range of disadvantages for underrepresented groups. They are excluded from taking part on meetings by language, physical, or time barriers (part-time work) and cannot identify with the corporate culture. The lack of accessible workplaces excludes people with disabilities and reduces their opportunities on the labor market. Unconscious bias and inappropriate working conditions (lack of part-time working options, lack of accessible workplaces) and unequal pay lead to employees having limited career opportunities due to their gender, age, origin, or physical limitations, or to them not being considered for management positions. This can impact them psychologically and financially.		x	
Workers in the Value Chain	Working conditions and human rights issues in the upstream value chain	The provision of internet and telecommunications services depends on IT hardware that use raw materials such as rare earths and metals. Serious human rights issues can occur and labor rights can be disregarded during the extraction of these raw materials in global supply chains, especially in countries with weak regulatory frameworks. Examples include dangerous working conditions in raw material extraction, which may severely damage workers' health and even results in deaths. In addition, workers are often exposed to abuse, violence, and forced labor without having adequate protection or legal certainty. Child labor, underpayment, and inadequate accommodation for migrant workers and foreign employees aggravate their exploitation. Such conditions impact the physical and psychological health of those affected and endanger their human rights.	x		
Workers in the Value Chain	Exploitation of service providers in the downstream value chain	Hardware ordered by customers (e.g., mobile phones or network devices) is delivered by shipping service providers. Working conditions there may not comply with social standards and may negatively impact the quality of life of the workers affected, especially as a result of unfair pay.			x
Consumers and End-users	Dangers for fact-based opinion-forming	The editorial content on pages such as WEB.DE and GMX involves a social responsibility, especially as regards informed, well-founded opinion-forming. The dissemination of fake news can lead to readers developing a distorted perception of reality. In the long run, subjective reporting leads to people no longer trusting the news. This facilitates the development of bubbles in which one-sided content, fake news, and algorithms constantly reinforce one's own perspective and blank out other viewpoints. In the long term, this seriously impacts democracy by suppressing diverse, balanced opinion-forming.			x

Consumers and End-users	Consequential damage for customers due to poor service quality	Poor customer service quality can lead to people losing access to their digital services, e.g., if they are unable to log in to their e-mail mailbox and do not receive any help. For example, they could be unable to access their online banking programs, something that not only strongly impacts the customer experience and further damages trust in digital services but can also lead to financial losses for users. This affects particularly vulnerable groups, making social inclusion even more difficult.			x
Consumers and End-users	Digital security and consumer protection	As a digital service operator, United Internet has a high level of responsibility for the data entrusted to it, e.g., e-mails, personal photos, or payment data. A lack of data privacy, inadequate cybersecurity, or data center outages could lead to the loss or publication of sensitive user data. This could result in financial losses or psychological damage for those affected, e.g., as a result of identity theft or fraud.			x
Consumers and End-users	Breaches of youth protection requirements in the digital environment	Failing to provide the protective measures required to allow children and young people to access the internet securely can have serious consequences. Insufficient control can lead to content that is harmful to young people or illegal, such as extreme right-wing articles, being distributed by e-mail, advertising, or in editorial contexts. This can lead to psychological damage to young users and affect their digital education, negatively impacting their quality of life in the long-term. Parents can also be indirectly affected due to the danger to their children.			x
Business Conduct	Infringements of internal guidelines/rules	Inadequate prevention/a lack of awareness among employees regarding internal guidelines such as the Code of Conduct can result in a negative corporate culture or disrespectful behavior. The impacts can lead to psychological stress and consequences for employee health.		x	
Digital Ethics and Responsibility	Ethical and legal dangers from the use of AI in processes and services (within the Company)	The use of AI in processes and services entails a variety of legal and ethical dangers. These include breaches of data privacy if sensitive data are fed into publicly available language models. This could lead to financial and intangible losses for the people affected (e.g., as a result of the publication of payment data or sensitive personal information). In addition, AI models may exhibit bias, leading to discriminatory decisions and promoting social injustice. Excessive automation reduces personal contact with customers, which can negatively impact their user experience. Uncertainty also exists about the legal and ethical use of third-party AI applications, a situation that entails compliance and human rights risks.		x	

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Digital Ethics and Responsibility	Telecommunications infrastructure outages	An outage of, or damage to, the telecommunications infrastructure provided by United Internet could have severe consequences for society by causing long-term supply bottlenecks, severe disturbances to public order, or other dramatic consequences for critical infrastructure. Since telecommunications systems serve as the basis for many central services such as emergency communications, traffic management, energy supplies, and financial transactions, outages affecting these systems could have a domino effect. This could interrupt the ability of vital sectors to function and hinder the coordination of emergency services deployments and governmental measures.			x
Digital Ethics and Responsibility	Impacts of cybersecurity incidents on the value chain	Inadequate cybersecurity actions and the failure to perform security updates make IT systems vulnerable to large-scale attacks, potentially resulting in business interruptions and the theft of sensitive personal or business data. Such cyberattacks not only affect the Company, but also its customers, partners, and dependent service providers. This could lead to blackmail and considerable economic losses. In addition, there is a danger that corporate services could be misused for illegal activities. In the long term, such incidents can undermine trust in digital technologies and services.	x	x	x
<b>POSITIVE IMPACTS</b>					
Resource Use and Circular Economy	Reduced use of resources and waste generation due to circular economy	The conscious purchasing of sustainable materials and awareness-raising among business partners can increase the use of recyclable and renewable raw materials, and of secondary materials in IT hardware. This promotes enhanced resource efficiency and supports the transition to a circular economy. Environmentally friendly transportation packaging further reduces material requirements. Hardware that is returned both by customers and within the Company itself is analyzed, refurbished, and resold, extending product life cycles. Devices that cannot be reused are recycled. The growing portfolio of refurbished products also helps reduce the need for new resources and to strengthen the circular economy.		x	x
Employees at United Internet	Social stability through fair working conditions	Secure, permanent employment contracts with protection against dismissal and fair, transparent pay can offer social protection and promote a stable society. An open social dialog allows actions to improve working conditions to be identified on a regular basis, enhancing employees' long-term satisfaction. Clear development prospects and equal opportunities can enhance workers' feeling of being valued, while comprehensive benefits in the areas of health, finance, and the environment can enhance their quality of life.		x	

Workers in the Value Chain	Employment and inclusion of persons with disabilities (workers in the value chain)	Working together with inclusive business partners actively supports inclusion and promotes the employment of persons with disabilities in the value chain. This not only contributes to a more diverse and integrative working environment but also enhances equal opportunities and social justice. At the same time, it promotes independence, a feeling of self-worth, and social integration among persons with disabilities.			x
Consumers and End-users	Facilitating digital participation	United Internet provides the infrastructure and products to participate in the digital world by offering and operating telecommunications services and selling devices and services.			x
Business Conduct	Sustainable value creation and resilience through responsible, long-term business conduct	Responsible, long-term business conduct promotes sustainable value creation within the Company, conserving resources and reducing pollution. At the same time, a fair, respectful, and rules-based interaction throughout the Company creates a positive working environment that supports social justice. This contributes to the Company's resilience and hence to long-term job stability and to a sustainable value chain.		x	
Digital Ethics and Responsibility	Supporting digital transformation and long-term competitiveness	United Internet is contributing to the digital transformation process by expanding fast digital data networks and connecting companies, small enterprises, schools, and public facilities to them. This is smoothing the way for innovations and hence promoting long-term competitiveness and preserving jobs. For example, digitalization can be used to expand education and business travel can be replaced by digital meetings, positively impacting the environment and society.			x
<b>RISKS</b>					
Climate change	Cost increases due to the consequences of climate change	Climate change is leading to the increased occurrence of extreme weather events such as floods, heavy rainfall, or heat waves. These can cause considerable damage to buildings and technical infrastructure, and business interruptions (e.g., data center cooling systems can fail during heat waves). Consequential financial losses include the loss of customers, the need for new buildings, repairs, conversions, and additional long-term resilience-building measures that may become necessary (such as additional cooling systems or flood protection measures).		x	
Resource Use and Circular Economy	Increasing resource/material shortages	Geopolitical conflicts, natural disasters, and increasingly scarce raw materials lead to delays or outages in supply chains and hence to higher costs, since the competition for raw materials and strategic metals is increasing (one example of this is the material-intensive expansion of the fiber-optic network). Time lags could lead to a delay in new customer growth and to financing risks. The failure to replace data center hardware as a result of supply chain outages could lead to revenue being lost from business interruptions.	x	x	



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Employees at United Internet	Shortage of specialist staff and employee turnover due to unattractive working conditions	United Internet competes with other companies for good specialists and managers, and there is a shortage of specialists in some areas. Insufficient investment in employee development (e.g., training and skills development) and in attractive, secure working conditions reduces employee satisfaction. This leads to higher turnover rates and time lost due to sickness. Employer attractiveness declines, making retaining and recruiting qualified specialists more difficult. In the long term, this leads to a loss of innovative ability, slower implementation, and lower potential growth, entailing costs and the loss of customers due to competitive disadvantages		x	
Consumers and End-users	Failure of own mobile network	Failure of the Company's own mobile network, e.g., due to a data center overload, could lead to claims for damages, contract terminations, reputational damage, and difficulties in acquiring new customers.		x	
Business Conduct	Misconduct and irregularities	Breaches of the law and directives in force (e.g., in connection with liability risks, environmental regulations, etc.) could impact revenue as a result of lost customers who no longer have confidence in the Company. What is more, illegal or unethical business practices could lead to fines and in individual cases to criminal prosecutions (corruption, bribery, and other forms of illegal behavior).		x	
Business Conduct	Failure to integrate sustainability matters with product development	If the Company were to fail to live up to its responsibility to society and the environment and not to develop any sustainable products or services, this could lead to it losing customers to competitors with a sustainable approach, since both business customers and consumers are increasingly emphasizing the need for sustainable practices and energy-efficient technologies. If the Company were to fail to act sustainably, this could result in a negative brand image and hence to a decline in profitability, which in turn would have negative effects on financing. In the long term, this would adversely affect the Company's competitiveness.		x	
Digital Ethics and Responsibility	Follow-on costs due to cyberattacks or hardware theft	Cyberattacks or hardware entail a danger that unauthorized persons could access customer or business data, or that they could misuse United Internet's systems for criminal activities. The Company could incur high follow-on costs due to legally prescribed investigations of attacks, system outages and recovery effort, the loss of customers, legal costs, etc.		x	

Further details on the impacts on people and the environment, the links to strategy and the business model, and the associated time horizons and involvement with material impacts are provided in the topical chapters. Entity-specific disclosures have been assigned to the chapters they fit best in terms of content. They examine topics of particular importance to stakeholders, providing more detailed insights into the segments' individual business activities and strategic priorities.

The segment strategies and business models were reviewed for resilience both qualitatively and in selected areas so as to ensure that material impacts and risks are dealt with as effectively as possible and that material opportunities can be optimally exploited. This resilience analysis will be standardized and expanded to cover all IROs in the coming reporting cycles.

## Disclosure Requirements Covered by the Company's Sustainability Report oriented on the ESRS



See "Overview of Policies and Guidelines" on page 8 ff.

The content-related materiality of the sustainability topics described in detail in this Sustainability Report was determined using a double materiality assessment oriented on the requirements on section 3.2 of ESRS 1. In the final step of the assessment, the topics were assessed for decision-usefulness. The assessment looked both at the relevance oriented on the regulatory requirements under ESRS 1 and at the relevance for the Company's strategic orientation and for material stakeholder groups.

**Climate Change Mitigation and Adaptation**

Resource Use and Circular Economy

EU-Taxonomy

## ENVIRONMENTAL INFORMATION

### Climate Change Mitigation and Climate Change Adaptation

United Internet acknowledges the urgency and global importance of climate change mitigation and climate change adaptation. In this chapter, the Company provides the detailed current status of data collected for climate-related metrics. The chapter also shows that the focus in fiscal year 2024 was on data collection. The aim in fiscal year 2025 is to develop Group-wide strategies for emissions reduction and for implementing sustainable business practices.

### Material Impacts in the Areas of Climate Change Mitigation and Climate Change Adaptation

United Internet's double materiality assessment determined that its energy requirements and greenhouse gas emissions result in both actual and potential impacts.

#### Emissions from Own Operations

United Internet provides internet and telecommunications services whose operation depends on an energy-intensive infrastructure (mobile networks and data centers). Consequently, the main emissions in its own operations relate to energy consumption by its data centers and telecommunications networks. In addition, battery arrays designed to ensure an uninterrupted power supply for telecommunications network operations in the case of power outages or voltage fluctuations result in emissions. Moreover, standby power systems are deployed at the technical locations so as to ensure uninterrupted power supplies in emergencies. These run on energy from fossil sources (diesel and gasoline), resulting in additional emissions if they are deployed. What is more, leakages can lead to coolant escaping in own and leased data centers. Equally, emissions from own operations occur at United Internet's office locations. These include emissions from electricity and heating consumption, the consumption of coolant for air conditioning units, and employee mobility resulting from workplace commuting and business travel.

#### Upstream Value Chain Emissions

Emissions in the upstream value chain are primarily attributable to the expansion of the data centers and the network infrastructure. These represent the majority of emissions from purchased goods and services, and from capital goods. Other emissions arise in the upstream chain for electricity and heating in offices and the telecommunications network. Still other emissions are produced by waste (e.g., office or canteen waste), and as a result of the logistics for purchased and resold goods. In addition, emissions are generated in the upstream value chain at leased co-location data centers and technical locations. Energy trading by the Consumer Applications Segment also generates energy-related emissions from upstream extraction and processing, and from the transportation of electricity.



See "Resource Use and Circular Economy" on page 46ff.

## Downstream Value Chain Emissions

Downstream emissions arise from the sale of merchandise and customer premises equipment such as smartphones or routers. This happens both during the use phase for such goods and as a result of their recovery at the end of their life cycle. In some cases, United Internet resells used IT equipment from its business operations that has been refurbished for resale. This also leads to emissions from their processing, use, and recovery at the end of their life cycle. Additional emissions are produced as a result of the energy trading performed by the Consumer Applications Segment due to the use of the natural gas that is traded.

Other downstream emissions result from the equipment with which users access United Internet services such as e-mail mailboxes. These emissions are not reported since United Internet cannot influence its customers' electricity contracts.

Moreover, emissions arise from equity interests in companies over which there is no operational control.

All in all, United Internet's energy consumption is expected to continue to increase in the coming years as data loads and the need for telecommunications services go on growing and the telecommunications network continues to expand.

## Material Climate Change Risks

The double materiality assessment identified a material climate-related risk in addition to actual and potential impacts. Climate change is leading to the increased occurrence of extreme weather events such as floods, heavy rainfall, or heat waves, which may impact the operating business. This can lead to substantial damage to own buildings and technical infrastructure, and also cause business interruptions. For example, United Internet's data centers could be impacted if their cooling systems were to fail in heat waves. Potential consequential financial losses include the loss of customers, the need to construct new buildings, repairs, conversions, and additional measures to enhance resilience in the long term, such as additional cooling systems or flood protection measures.

## Identification and Assessment of Material Climate-related Impacts, Risks, and Opportunities



See "General Information" on page 5ff.

The climate-related impacts, risks, and opportunities (IROs for short) were identified in the normal manner during the double materiality assessment process. Internal experts, and especially the sustainability managers at Corporate and in the other segments and departments (TechOps), were consulted in relation to the collection and assessment of the IROs. In addition, the results of the corporate carbon footprints (CCFs) for selected segments performed in previous years and information from the greenhouse gas footprinting process performed in fiscal year 2023 were compared with the results of the IRO assessment and analyzed. Here United Internet focused on direct (Scope 1 and 2) and indirect (Scope 3) greenhouse gas emissions, and on the resulting emission reduction levers.

United Internet used a process for identifying and assessing climate-related risks and opportunities to prepare for the double materiality assessment. This scenario-based climate risk analysis covers both physical risks and transition risks in own operations and throughout the value chain.

**Climate Change Mitigation and  
Adaption**

 Resource Use and Circular  
Economy

EU-Taxonomy

## Scenario Analysis for Physical Risks from Changes in the Climate

The physical risk assessment involved identifying a total of 27 relevant locations and examining them for their hazard exposure. They include 12 office locations in which a total of 70 % of employees work. In the case of the technical locations, the focus was on the four core data centers. Although these are protected by a redundancy policy, simultaneous outages could have a critical impact on business operations, as well as on the data centers run by United Internet and on a research and development location. Two logistics locations were also analyzed. Locations with only a small number of employees were excluded from the assessment. Locations with adequate back-ups – such as a redundancy policy in the case of small data centers or a national roaming back-up in the case of antenna locations – were also excluded. Equally, the downstream value chain was not analyzed, since for example the use of digital services is not location-specific.

The analysis was performed with the help of Munich Re's Location Risk Intelligence Platform. Data from the Intergovernmental Panel on Climate Change (IPCC) was used. The IPCC is an international United Nations body that assesses scientific insights on climate change. A variety of different future scenarios for climate change progression were used to determine each location's potential climate-related hazards. The main focus of United Internet's assessment was on the SSP5/RCP8.5 scenario. This future scenario, also known as a "high-carbon scenario," assumes a global temperature increase of 4.4°C by 2100. It assumes high global emissions in the coming years and decades and hence permits a detailed assessment of, and stress test for, physical climate risks. The 28 climate-related hazards defined by the EU Taxonomy and the CSRD were projected for each location using specific indicators and were normalized on a scale from 1 (very low) to 5 (very high). The Company focused on three core periods for this assessment: the present, the medium-term future (2030), and the long-term future (2050).

The net climate risks were derived from the climate hazards by specifying that a hazard exists in all cases of high (4) or very high (5) hazard exposures, regardless of the period in which it is forecast to occur. A per-hazard assessment was made for each location to determine whether an exposure exists in principle – i.e., whether the location assets could be exposed to a hazard – and how sensitive the assets are to the hazard concerned. No additional assessment of the climate hazard was performed in those cases in which sufficient adaptation options and precautions already exist, since no net climate risk was identified.

No net climate risks were identified for United Internet in the course of the climate risk analysis.

## Scenario Analysis for Transition Risks from Climate Change Mitigation Actions

Transition risks and opportunities were assessed using a scenario-based analysis that assumes global warming is successfully capped at 1.5°C. This scenario takes factors such as regulatory developments, economic trends, technological advances, and changing consumer behavior into account. It is conceived as a stress test for transition risks. Where available and necessary, data from 1.5°C/net zero scenarios from sources such as the International Energy Agency (IEA) and the Network for Greening the Financial System (NGFS) was used. A comprehensive list was drawn up for use in identifying transition risks and opportunities; this was based on industry standards, best practices, and research, and was adapted to United Internet's specific business model. The risks were broken down into four main categories: political and legal, technology, market, and reputational risks.

Following the identification of the risks and opportunities, the Company's exposure and sensitivity to these gross risks and opportunities were assessed by Corporate Sustainability and the segment sustainability managers. The exposure to the risks was rated on a five-point scale (ranging from "no exposure" to "very high exposure"). The magnitude of the exposure was assessed on the basis of how much United Internet is affected by the risk or opportunity, measured in terms of the value creation for the



National roaming: Enables mobile network users to access network services outside their home provider's coverage areas without having to change provider.



See the [IPCC](#).



See the [IEA](#).

See the [NGFS](#).

Company as a whole. Among other things, this was evaluated by analyzing how many of the Company's segments are exposed to the risk. In addition to looking at the exposure, the sensitivity to the risk or opportunity was also analyzed. This assessed how strong the potential impacts on the Company would be if the risk/the opportunity were to materialize. Where possible, forecasts of the financial impacts (measured in terms of EBIT) were already used so as to provide a more robust estimate of the sensitivity. Transition risks and opportunities were assessed using the same timelines as for the materiality assessment: less than two years (short-term), two to five years (medium-term), and more than five years (long-term).

If the assessments of the exposure or sensitivity factors exceeded a given threshold, the risk/opportunity was classified as a material gross risk or opportunity. The results will be incorporated in future into the Company's strategic planning so as to develop robust measures to minimize the risks and leverage the opportunities presented by climate change.

To date, United Internet's financial reporting has addressed location-based critical climate-related assumptions, including natural disasters and physical climate risks. These are partly compatible with those used in the physical climate risk assessment. Although the climate risk analysis makes more extreme assumptions in the SSP5/RCP8.5 scenario, the outcomes differ only marginally. Transition risks resulting from climate change mitigation actions in a 1.5°C scenario are only examined in the climate risk analysis for the Sustainability Report, not in the financial reporting.

## Resilience Analysis

The risk of "increased costs due to the consequences of climate change" that was identified in the double materiality assessment combines a number of different physical climate risks. It should be noted that the double materiality assessment looked at the risks from a gross perspective, i.e., potential adaptation measures were not yet taken into account.

In its resilience analysis, United Internet took material gross risks that resulted from the climate risk analysis into account. These risks cover all material parts of the upstream value chain, the Company's own value chain, and the downstream value chain. The physical climate risk analysis for location-based climate risks revealed that United Internet's material locations are not currently exposed to any net climate risks. The analysis of the transition risks resulting from climate change mitigation based on the 1.5°C scenario determined three material transition risks. These were examined in more detail during the double materiality assessment so as to develop suitable actions and adaptive capacities.

## Climate Strategy and Transition Plan for Climate Change Mitigation

A Group-wide climate strategy and a climate transition plan are currently being prepared; the goal is to develop them in fiscal year 2025 and further expand them in the coming years. A sound data pool had to be created in preparation for implementing these strategic steps. To do this, United Internet has identified the CCFs for all segments and at a consolidated level for the Group as a whole.

To date, United Internet has only had climate targets in some of its segments, and these are not aligned with the Paris Agreement. In fiscal year 2025, a Group-wide climate transition plan will be developed including climate targets that are oriented on the global 1.5°C goal and the recommendations for science-based targets. The CCF serves as the basis for the Group-wide climate transition plan, which will incorporate the segment-specific climate change mitigation actions. The goal is for the Group to provide a structured, coordinated framework for the climate change mitigation actions at segment level.

**Climate Change Mitigation and Adaption**

Resource Use and Circular Economy

EU-Taxonomy

The most senior level in the organization that is accountable for all climate change mitigation strategies and actions is United Internet's CFO. The latter is informed by Corporate Sustainability of current developments in monthly meetings.

## Decarbonization Levers

United Internet is already working at segment level to reduce emissions as far as possible. Even though comprehensive, overarching decarbonization targets had not yet been defined in fiscal year 2024, work on individual measures was and is being continued successfully.

The CCFs for the segments and their consolidation in the Group carbon footprint clearly show where the greatest levers for reducing emissions in United Internet's own operations are to be found. With regard to Scope 1 and Scope 2 emissions, they mainly relate to energy efficiency increases (especially in the Group's own data centers and in the fiber-optic network). The segments are accelerating the use of electricity generated from renewable energy sources ("green electricity") on the basis of Group-wide requirements and recommendations.

A Group-wide Company Cars Policy, which prescribes actions to reduce carbon emissions in the vehicle fleet, was developed in fiscal year 2024 and introduced throughout the Group on January 1, 2025.<sup>1</sup>

## Climate Strategies and Climate Change Mitigation Actions in the Segments

The Business Applications Segment is pursuing its own climate strategy 2030. This focuses on steadily reducing carbon emissions by using 100 % renewable energy at all its own data centers and successively cutting the amount of electricity sourced from the national grid by installing additional photovoltaic systems. At present, photovoltaic systems have been installed on three data centers. In addition, the goal is to use 100 % renewable electricity in co-location data centers by 2030; the share already reached in fiscal year 2024 was 85.93%. In addition, the process of reducing carbon emissions will be driven forward wherever possible, e.g., by also using biofuels to run the emergency generator sets. One data center in the segment already only uses biofuels. The segment's commitment to sustainability continues to focus on steadily increasing energy efficiency in its data center operations as part of its ISO 50001-certified energy management system and ISO 14001-certified environmental management system.

The Business Access Segment is cutting emissions in a number of ways: decisive decarbonization levers are efficiency increases, especially in the fiber-optic network, and reducing and ideally completely avoiding carbon emissions through the use of renewable energy. The Business Access Segment is currently introducing an ISO 50001-compliant energy management system and an ISO 14001-compliant environmental management system so as to continue minimizing its energy requirements and emissions from own operations, and to increase energy efficiency.

Since fiscal year 2022, the Consumer Applications Segment has performed a comprehensive annual CCF exercise (including capturing all scopes) so as to identify sources of emissions and potential for reductions. This analysis was used to define climate goals and reduction measures for fiscal year 2024. At present, a segment-specific climate strategy is under development and an ISO 50001-compliant energy management system is being established.

<sup>1</sup> The Guideline does not apply to foreign companies and their subsidiaries.