



**Sustainability Report  
2021**

## KEY FIGURES

Details on the key economic, social, and environmental figures given below can be found in the individual sections of this report.

Key figures	2019	2020	2021
<b>FINANCIAL/BUSINESS KPIS</b>			
Revenue (in €m)	5,194.1	5,367.2	5,646.2
EBITDA (in €m) <sup>(1)</sup>	1,244.2	1,218.2	1,259.4
Earnings per share (EPS) (in €) <sup>(1)</sup>	1.88	1.87	2.10
Free cash flow (in €m)	496.0	376.6	495.2
<b>RESPONSIBLE CORPORATE MANAGEMENT</b>			
Number of confirmed incidents of corruption	0	0	0
Pass rate for Code of Conduct e-learning course (in %)	92.50	92.29	91.22
<b>CUSTOMER-RELATED MATTERS/PRODUCT RESPONSIBILITY</b>			
Number of customer contracts – Consumer Access (in millions)	14.33	14.83	15.43
Number of fee-based accounts – Consumer Applications (in millions)	2.26	2.37	2.47
Number of free accounts – Consumer Applications (in millions)	37.59	39.40	40.32
Number of customer contracts – Business Applications (in millions)	8.15	8.45	8.78
Length of fiber-optic network (in km)	approx. 48,500	approx. 50,900	approx. 52,600
Number of shipments by 1&1 Logistics (in million units)	6.90	6.03	6.38
<b>CORPORATE DIGITAL RESPONSIBILITY</b>			
Number of reports of data privacy violations under the GDPR	86	39	50
German internet users using GMX/WEB.DE as weekly news source (in %)	13 / 12	12 / 12	10 / 11
<b>UNITED INTERNET AS AN EMPLOYER</b>			
Number of employees	9,374	9,638	9,975
Staff turnover rate (in %)	8.96	6.70	11.21
Management positions filled internally (in %)	70.19	73.65	65.71
Women in management positions (in %)	16	17	18
Hours training and education per employee	11.91	9.46	13.29
Absence due to illness (in %)	5.75	4.40	4.31
<b>CLIMATE AND ENVIRONMENTAL PROTECTION</b>			
Energy consumption (in MWh)	217,165.94	206,959.87	212,580.46
thereof electricity consumption (in MWh)	200,475.96	194,248.29	201,196.01
Energy intensity – data centers (in Wh/€)	25.76	24.42	23.41
Business travel and company car trips (in km million)	37.70	19.10	13.41
CO <sub>2</sub> equivalents in tonnes	40,568.35	31,349.57	28,340.31
<b>UNITED INTERNET AS A BUSINESS PARTNER</b>			
Cost of purchased services (in €m)	2,048.47	2,317.92	2,169.94
Cost of purchased goods (in €m)	734.58	794.24	824.94
<b>OUR SOCIAL COMMITMENT</b>			
Donations collected by United Internet for UNICEF (in €m)	4.73	4.93	6.44

(1) Figures for 2019: not including extraordinary income from sale of shares in virtual minds; 2020: including prior-period positive impact on net income in 2021 attributable to H2 2020, but not including write-off of still available VDSL contingents; 2021: not including prior-period positive impact on net income in 2021 attributable to H2 2020 and not including noncash remeasurement effects on derivatives.

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## KEY



Internet link



Definition



Page reference

GRI [number] Reference to GRI Disclosure

NFE [NfS-content] Reference to CSR-RUG  
Requirements

## FOREWORD

Dear reader,

GRI 102-14

Climate change and how to combat it were already on everybody's lips even before the recent German elections. The world is in the middle of a profound transition towards a sustainable economy. And more and more clearly at the heart of this is the ongoing process of digital transformation, whose impact on developments in our daily lives and many different aspects of society is growing significantly. We are a leading European internet specialist with more than 25 million customer contracts, over 39 million ad-financed free accounts, and a workforce of roughly 10,000 people. As such, we see our role as building bridges to a sustainable digital future – one that has to be safe, reliable and accessible to all. We take the responsibility that results from our strong market position extremely seriously here.

Doing business sustainably in all our divisions is second nature to us at United Internet AG. We aim not only to fully comply with the increasingly rigorous regulatory requirements but also to continuously enhance and delve deeper into our action areas, and to ensure transparency about them. We succeeded in this once again in our fifth year of reporting



See "Corporate Digital Responsibility" on page 39ff.

We are maintaining our clear focus on corporate digital responsibility (or "CDR" for short), especially in relation to our pioneering activities in the areas of 5G, fiber optics, and cloud services. This includes digital participation, data privacy, and information security, among other things. Our vision is to act as secure, trusted providers for consumers and companies alike, offering them greater and greater bandwidth for internet access and powerful cloud applications. In this way, we can enable everyone to leverage the numerous and growing opportunities offered by the internet as a universal infrastructure for information, communication, entertainment, and e-business.



See "Climate and Environmental Protection" on page 81ff.

Environmental and climate protection is also one of our key action areas, and one in which we set ourselves the highest standards. We continued to optimize and expand our internal data collection activities so as to obtain an even better picture of the positive and negative impacts of how we do business, and hence to be able to identify the measures that need to be taken. Today, those of our data centers that are owned by IONOS Holding and 1&1 AG already only use renewable energy for regular operations. This demonstrates that we are closely monitoring our most energy-intensive areas, and that we design them to be highly energy-efficient. In addition, the EU Taxonomy, parts of which will enter into force in 2022, sets out a binding road map for environmentally-friendly financial investments. This will dominate both our own environmental activities and those being taken by all other European companies for the long term. Other ways in which we are helping protect the environment include installing efficient energy systems in all new buildings and revising our mobility policy in 2021 in favor of sourcing electric vehicles.



See "United Internet as an Employer" on page 60ff.

The health of our employees and their families is a top priority during the COVID-19 pandemic. Among other things, we again expanded mobile working options last year, developed testing and vaccination offerings, and introduced regular digital healthcare courses, which were eagerly received. I am delighted to say that we have continued to be a strong, committed team despite the distances between us.



Another essential part of United Internet’s culture is our conviction that diversity is one of the keys to long-term business success. We want to promote a values-based, diverse working environment under the motto “United in Diversity”. In line with this, we held the first “UI Diversity Days” in 2021 – an interactive series of talks and presentations by and for staff on topics such as unconscious bias, part-time working for men, and accessibility. In addition, we signed up to Germany’s Diversity Charter in May 2021, clearly signaling to outsiders our determination to recognize, value, and include diversity in our company.



See “United Internet as an Employer” on page 60ff.

Equally, we aim to be a consistently reliable and trusting partner in our business relationships, too, and to meet our due diligence obligations as a company. In line with this, we have reviewed our value chain in detail for transparency, especially with respect to the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG), along with the processes needed to prevent human rights risks.



See “United Internet as a Business Partner” on page 96ff.

We also celebrated the fifteenth anniversary of our United Internet for UNICEF foundation in 2021. The regular appeals for donations that we make to our GMX, WEB.DE, 1&1, and IONOS customers, coupled with the money donated by the United Internet Group itself, have raised roughly €60 million for global UNICEF programs since the foundation was set up. For example, last year the foundation provided significant support for UNICEF’s #ENDviolence campaign to protect children in Cambodia, helped people in India and Haiti who were suffering hardship as a result of COVID-19, and launched a successful appeal for donations to help victims of the drastic flooding in Germany’s Ahr Valley. The foundation has been extremely successful in helping children and people in need in the years since it was founded in 2006. We are delighted to be part of such a good cause and are looking forward to many more milestones from the foundation going forward.



See “Our Social Commitment” on page 104ff.

We intend to continue focusing closely on, and taking a critical approach to, the changing challenges and opportunities that sustainability will bring in the coming years, to address them directly, and to remain proactive. These are things that I am looking forward to personally, too.

**Elements of the nonfinancial statement (NfS) pursuant to the German CSR Directive Implementation Act (CSR-RUG, sections 315b and 315c in conjunction with section 289c of the German Commercial Code (HGB))**

This sustainability report includes United Internet's consolidated nonfinancial statement as required by the German CSR Directive Implementation Act (CSR-Richtlinie-Umsetzungsgesetz – CSR-RUG). It contains the statutory and supplementary disclosures for the material aspects for United Internet: environmental matters, employee-related matters, social matters, respect for human rights, and anti-corruption and bribery matters. This list of the minimum aspects required by the CSR-RUG has been supplemented by "customer-related matters". These are material for United Internet and must therefore be reported.

The disclosures required by the CSR-RUG are identified throughout the report using margin notes:

"NfS: [CSR-RUG requirement]"

"NfS: [CSR-RUG requirement and CSR-RUG requirement]"

"NfS: [CSR-RUG requirement/material topic for United Internet]"

The information required by the CSR-RUG is explained in the related paragraph next to the NfS margin note. The principles governing the scope of the references mirror the hierarchy used for headings in this report.

**NfS reference in red following a red subsection heading:** Applies to the entire following chapter until the next red subsection heading, including to subchapters (black/grey subchapters).

**NfS reference in grey following black/grey subchapter heading:** Applies only to this subchapter or used to highlight a specific topic in cases in which the entire chapter has been flagged as relevant to the CSR-RUG in a margin note immediately following a red subchapter heading.

**NfS reference in grey within a chapter, no relation to a heading:** Refers directly to the paragraph immediately next to it.

An overview of the above-mentioned disclosures is given in the Annex on page XX. This shows the relationship between the disclosures required by the CSR-RUG and the material topics identified by United Internet, and maps a summary of the NfS references that are relevant for the CSR-RUG to the chapter sections.

## COMPANY PROFILE

### Our Vision

Today, the internet is an indispensable information, entertainment, communications, organizational, and e-business medium for consumers and companies alike.

NfS: Description of the Business Model

Its unlimited geographical reach and increasing access speeds are turning it into a universal infrastructure supplying not only information and entertainment offerings but also personal and business applications via mobile and fixed networks.

GRI 102-1  
GRI 102-2  
GRI 102-4  
GRI 102-6  
GRI 102-7  
GRI 102-10  
GRI 102-45  
GRI 203-1

Our vision is to offer consumers and business users attractive ways of meeting their information, communications, and entertainment needs, plus cloud applications from our "Internet Factory," and to deliver these via more and more powerful broadband links based on mobile and fixed network technology.

By expanding its network, United Internet is helping society to participate in the digital transformation process and to move safely around the digital world.

### Our Business

United Internet is one of Europe's leading internet specialists, with 26.68 million fee-based customer contracts (2020: 25.65 million; 2019: 24.74 million) and 40.32 million ad-financed free accounts (2020: 39.40 million; 2019: 37.59 million).

NfS: Description of the Business Model

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 our fixed-network broadband products and mobile internet products (including associated applications such as home networking, online storage, telephony, and internet protocol television (IPTV)) for consumers.

Customers are offered these internet access products in the form of fixed monthly subscriptions (plus variable, usage-driven top-up fees) for contractually agreed periods.

United Internet's 1&1 brand is one of Germany's leading providers of broadband products (and particularly VDSL/vectoring and fiber-optic connections).

The Company uses 1&1 Versatel's own fiber-optic network as a transportation network to access regional networks in the case of VDSL/vectoring and direct fiber-optic connections ("FTTH" = "fiber to the home"), and city carriers and Deutsche Telekom (primarily Layer 2) in the case of the last mile. Additional wholesale service providers are used for legacy business with ADSL connections.

United Internet's mobile internet products make it the leading mobile virtual network operator (MVNO) in Germany.



Mobile bitstream access mobile virtual network operator (MBA MVNO): A telecommunications provider that does not have its own physical network but instead uses an MNO's network to a certain extent, and that invoices this service in its own right.

Mobile network operator (MNO): A mobile communications provider that has its own physical network (radio masts, exchanges, a full range of technical equipment).



OpenRAN technology (RAN = radio access network): Permits radio connections between mobile devices and the core network. It consists of a base station, a software layer implemented on top of this, and the antenna for the radio connection to the devices.

United Internet is the sole MBA MVNO (mobile bitstream access mobile virtual network operator) in Germany with long-term, guaranteed rights to up to 30% of Telefónica Deutschland's used network capacity, and hence extensive access to one of Germany's largest mobile networks; it holds these rights indirectly via 1&1 AG. Apart from its privileged access to Telefónica's network, the organization also purchases standardized wholesale mobile network services from Vodafone.

It enhances the purchased network services with end-user devices from well-known suppliers, plus proprietary applications and services, something that sets it apart from its competitors.

United Internet markets its mobile internet products via the premium 1&1 brand and discount brands such as yourfone and smartmobile.de, allowing it to offer the mobile network market a comprehensive range of products and address specific target groups.

As part of its plans to build its own high-performance 5G mobile network, United Internet successfully acquired two 2 x 5 MHz frequency blocks in the 2 GHz band spectrum and five 10 MHz frequency blocks in the 3.6 GHz band spectrum during the 5G frequency auction in 2019. This was followed in 2021 by its signature of long-term contracts, bringing together all the core components needed to roll out its own mobile network and hence to add value in this market in the same way as in the fixed network sector. One such contract is the national roaming agreement signed between 1&1 and Telefónica on May 21, 2021, which guarantees 1&1 customers comprehensive mobile network coverage while the company is building its own network by allowing them to use Telefónica's network. Another is the partnership between 1&1 and Rakuten, announced on August 4, 2021, to jointly establish Europe's first fully virtualized mobile network, which will be based on innovative OpenRAN technology. In addition, an intercompany agreement was signed on December 9, 2021, between 1&1 and its sister company 1&1 Versatel, in particular to lease the access network (primarily fiber-optic cables) and the data centers needed to operate the 1&1 mobile network. Another contract was also signed on the same date with Vantage Towers AG, one of Europe's leading radio tower infrastructure companies. Among other things, Vantage will lease antenna locations to 1&1 and install the latter's high-performance 5G antennas.

## Business Access Segment

United Internet's Business Access Segment offers a comprehensive range of telecommunications products and solutions for business customers under its 1&1 Versatel brand.

1&1 Versatel's business model revolves around a state-of-the-art fiber-optic network more than 52,000 km long. This is one of the largest networks in Germany and is being continuously expanded.

It is used to offer companies a range of telecommunications products – from direct fiber-optic connections to customized, individual telecommunications solutions (voice, data, and network solutions). In addition, 1&1's fiber-optic network is used to provide (wholesale) infrastructure services for national and international carriers and ISPs.

The network provides direct connections to commercially used buildings and government sites ("FTTB" = "fiber to the building").



## Consumer Applications Segment

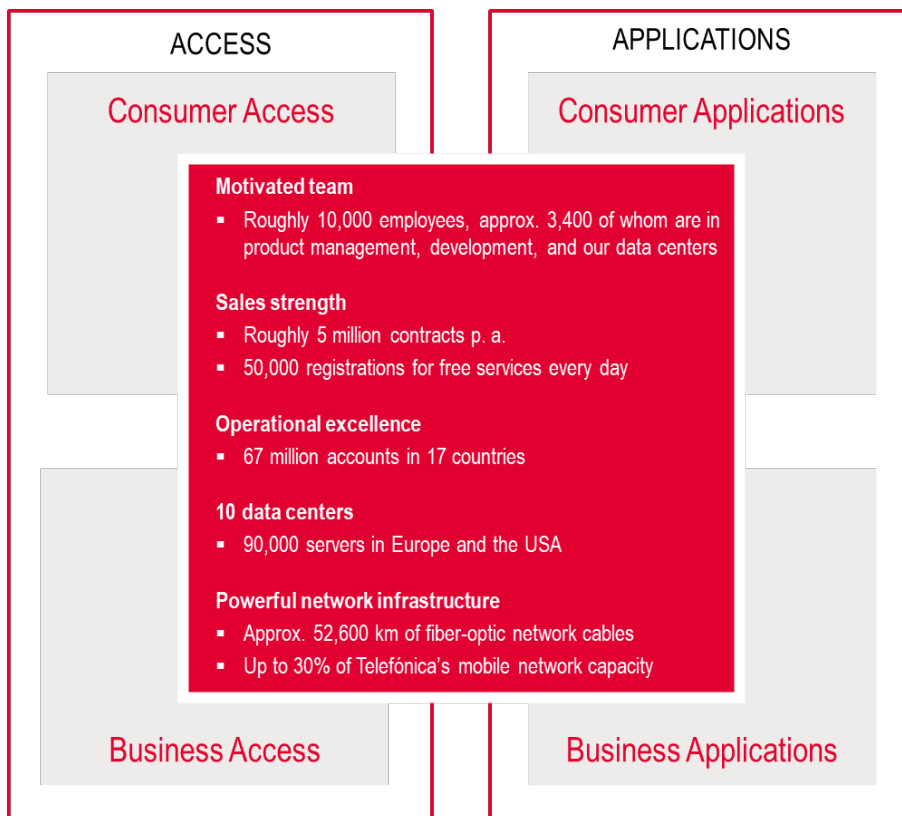
The Consumer Applications Segment is home to United Internet's consumer applications. These primarily include personal information management applications (e-mails, to-do lists, appointment/address management solutions), and online (cloud) storage, plus domains, consumer website solutions, and office applications.

The portfolio has been successively expanded, and the GMX and WEB.DE brands – the largest e-mail providers in Germany for years – have been transformed in recent years from pure-play e-mail suppliers to 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, to an increasing extent, also programmatic (i.e., data-driven) online advertising. United Internet Media is responsible for marketing.

United Internet's ad-financed and fee-based consumer applications use the GMX and WEB.DE brands and are mainly focused on Germany, Austria, and Switzerland; the Company is one of the leading providers in this region.



## 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 customers a broad, subscription-based range of high-performance services such as domains, websites, web hosting, servers, cloud solutions, e-shops, group work, online (cloud) storage, and office applications.

The product range has been expanded over the past few years beyond the core hosting packages that have been tried and trusted by millions of users and now includes numerous cloud-based e-business solutions.

The applications are developed in the Company's own development centers or in cooperation with partner organizations, and run on more than 90,000 servers in 10 data centers.

United Internet's Business Applications Segment is also an international leader in its field, with activities in Europe (Germany, France, the United Kingdom, Italy, Spain, the Netherlands, Austria, Switzerland, Poland, Hungary, Romania, Bulgaria, the Czech Republic, and Slovakia) and North America (Canada, Mexico, and the USA). The goal is to add other countries successively.

The business applications are marketed to specific target groups using a variety of differently positioned brands: IONOS, Arsys, Fasthosts, home.pl, InterNetX, Strato, united-domains, and World4You. In addition, United Internet's Sedo brand offers customers professional active domain management services, whereas CM4all (acquired as of February 1, 2021) offers other hosting providers a white-label website builder for creating high-quality websites.

**RESPONSIBLE CORPORATE MANAGEMENT**

**Acting Responsibly**

Compliance and Anti-corruption

Sustainability Strategy and Management

EU Taxonomy

# RESPONSIBLE CORPORATE MANAGEMENT

## The Basis for Acting Responsibly

### Corporate Governance

United Internet AG’s Management Board and Supervisory Board consider it their responsibility to ensure the Company’s continued existence, and to create sustainable value, by managing it responsibly and for the long term. For United Internet, running a business involves more than pursuing economic goals – the Company also sees itself as having an obligation to society, the environment, employees, and other stakeholders. Consequently, the Annual General Meeting in May 2021 expanded the Management Board remuneration system for new contracts of service, including ESG criteria in the short-term variable remuneration that forms part of the performance-related remuneration components. This target component is designed to focus Management Board members’ attention on sustainability issues and create an incentive for them to address them. The compensation paid to the Management Board and the Supervisory Board is set out in the Remuneration Report, which is available on the website. Basic information can be found in the Articles of Association.

GRI 102-16

GRI 102-18



See the [Articles of Association](#) on the United Internet website.

United Internet’s corporate governance activities are based on the German Stock Corporation Act (Aktengesetz – AktG) and on the requirements of the German Corporate Governance Code (the “Code”), and we publish an annual declaration of compliance with the Code in accordance with section 161 of the AktG.

### Diversity of the Management Board and Supervisory Board

United Internet’s diversity objective is for the Management Board and Supervisory Board to include a wide variety of different people and, as a whole, to have a sufficient breadth of opinion and knowledge. Among other things, this requires the members of the individual bodies to complement each other with respect to their experience and their educational and professional backgrounds, so as to have a good understanding both of the Company’s current business activities and of its longer-term opportunities and risks.

NfS: Measures to Achieve Gender Equality

GRI 405-1



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

The Supervisory Board was elected at the general meeting in fiscal year 2019, and its size expanded to six members. Kurt Dobitsch and Michael Scheeren left the Supervisory Board in 2021. Prof. Andreas Söffing and Stefan Rasch were elected to the Supervisory Board for the first time. The Supervisory Board is currently composed of four men and two women. This means that United Internet meets the statutory 30% target quota for female Supervisory Board members. The Company’s Management Board consists of two members and is currently composed exclusively of men. However, the aim is to increase the proportion of women to 30% if the Management Board is expanded in future or if new members are appointed. Both genders should be treated equally on the basis of their qualifications.

For further information, please see the chapter of the United Internet Group’s annual report entitled “Declaration on Company Management.”



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

## Our Values and Principles

GRI 102-16



See also "United Internet as an Employer" on page 60ff. for further information on our corporate culture and "United Internet as a Business Partner" on page 96ff. for our Code of Conduct for Business Partners.



See the [United Internet website](#).

Our enterprise-wide corporate values, our leadership principles, and our Code of Conduct are at the heart of what we do every day. All employees are made aware of these basic documents when they join the Company, and must abide by them. Our values and principles, and Code of Conduct are permanently available on our intranet and to some extent on the internet as well.

### Corporate Values

Our values strengthen our self-image and provide a framework for how to act. Only a set of common beliefs enables us to think and act together. Our values apply in our dealings with one another and with customers and business partners.

- A commitment to success
- Agility
- A sound approach
- Fairness
- Openness
- Responsibility

### Leadership Principles

Our leadership philosophy is based on making people successful. Our leadership principles define the following characteristics for our managers:

- We take responsibility and display courage
- We are co-entrepreneurs
- We act as role models
- We empower staff and motivate them to do their best
- We lead through active dialog
- We promote a strong team culture

### Code of Conduct

Our Code of Conduct links our corporate values with our internal guidelines. It sets out shortly and succinctly how to act in compliance with our values, the law, and our guidelines. It uses examples to illustrate key principles and makes concrete recommendations on how to deal with colleagues, business partners, investors, competitors, customers, and the media.

## Risk Management

GRI 102-11



See the "Risk, Opportunity, and Forecast Report" in our [Annual Report](#).

The United Internet Group's risk and opportunities management policy aims to preserve and enhance the organization's values by exploiting opportunities and identifying and managing risks at an early stage. By walking the talk in this way, we ensure that United Internet AG can do business in a controlled organizational environment. Our policy sets out a responsible approach to dealing with the uncertainties that are an inevitable part of doing business. This also covers dealing with environmental risks. For further information, please see the chapter of the United Internet Group's annual report entitled "Risk, Opportunity, and Forecast Report."

**RESPONSIBLE CORPORATE MANAGEMENT**

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## Compliance and Anti-corruption

### Materiality, Impact, and Risks

For United Internet, compliance means both observing all statutory requirements and internal organizational guidelines, and acting in accordance with our corporate values. Its aim is therefore to ensure that all employees act in a legally and ethically acceptable manner. For United Internet, compliance is a precondition for doing business successfully in the long term and hence an integral part of all Group activities.

NfS: Anti-corruption and Bribery Matters

GRI 102-11

GRI 102-16

GRI 103-1

GRI 205

### Goals and Measures

United Internet AG's Management Board has established a compliance management system (CMS) to ensure ethical behavior and adherence to the law throughout the Group. The Group General Counsel, who reports directly to United Internet AG's CFO, is responsible for the CMS. Compliance is part of our end-to-end risk management approach, which comprises the Governance, Risk Management & Compliance (GRC), Corporate Audit, and Legal Department functions. Pooling these functions allows a common management approach to be adopted, utilizing and linking interfaces at content and process level. Dedicated compliance managers exist at segment level, while function-specific and local compliance managers have been appointed at the level of the operating divisions and foreign companies. These perform their compliance role as an additional part of their duties.

NfS: Instruments Against Corruption and Bribery

GRI 103-2

The overarching objective of our compliance activities is to prevent compliance violations. We achieve this by taking appropriate measures that are based on the Company's risk position, in keeping with our three-tier activity hierarchy – "Prevent, Detect, and Respond." Our compliance activities focus primarily on prevention: Transparent rules, well-informed employees, and early identification of potential infringements are the keys to success here.

Our Code of Conduct for employees is the foundation for legally and ethically acceptable behavior in this area. It summarizes the main rules, explains them using examples, and gives concrete recommendations for dealing with colleagues, customers, business partners, competitors, shareholders, public authorities, and the media. At the same time, the Code refers to our key internal guidelines, offering employees a rapid overview.

Among other things, our Code of Conduct for employees contains rules on how to ensure fair competition and anti-corruption. In line with our corporate value of fairness, it clearly states that we aim to outperform our competitors fairly and honestly, and that we will not employ any unfair practices to prevent, restrict, or distort competition. In addition, our Code of Conduct clearly sets out the measures that we take to prevent corruption, and uses concrete examples to explain what we mean by anti-corruption. We do not tolerate corruption, regardless of where it happens, whom it targets, or what the reason for it is. In line with this, directly or indirectly offering or granting any form of undue benefits (bribery), and requesting or accepting such benefits (corruption), are prohibited.



See "United Internet as a Business Partner" on page 96ff. for information on compliance with human rights.

These basic rules are set out in more detail in our internal guidelines on preventing corruption and dealing with incentives and conflicts of interest. The guidelines are supplemented by approvals processes and confidential reporting channels plus IntegrityLine, the new electronic whistleblower system introduced in 2021. Once again there were no incidents of corruption or indications of potential cases of corruption in the reporting period, as in the year before.

GRI 205-2

GRI 205-3

An e-learning course on the Code of Conduct is used to familiarize employees with its content in an interactive, easily understandable way. It is an integral part of the onboarding process for new staff. In addition, new employees are made aware of the importance of compliance during their “welcome day.”

## Results and Assessment

NfS: Results of Policies Pursued

We use specific measures to benchmark whether we have achieved our compliance goals. Measures-based performance indicators include training and e-learning course participation rates or the number of approvals issued in the course of anti-corruption and other compliance processes.

GRI 103-3

NfS: Nonfinancial Key Performance Indicators

A total of 6,679 employees (2020: 6,586; 2019: 5,845) had passed the test at the end of the mandatory e-learning course on the Code of Conduct as of December 31, 2021. This corresponds to an overall success rate of 91.22% (2020: 92.29%; 2019: 92.50%).

## Sustainability Strategy and Management

### Approach

#### Definition of Sustainability

NfS: Policies Pursued

“Sustainability” – which can be defined in simple terms as ensuring that the needs of both current and future generations can be met – is a critical issue facing society, politics, and business. Associated social developments and “megatrends” such as digitalization and climate change, and the transformation processes these are causing are being discussed across all sectors, be it in connection with data privacy, how to deal with (fake) internet news, the changing world of work, or the transition to a low-carbon economy. Regulators have also increased their focus on the supply chains of products on offer in recent years. Companies can often have a material impact – both positively and negatively – on these issues. The reverse is also true, for example as a result of changes in society’s expectations (such as those triggered by the “Fridays for Future” movement), consumer and customer wishes, regulatory requirements, and increasing investor awareness of ESG aspects. This report shows how these and other sustainability topics relate to United Internet and how the Company deals with the resulting challenges and opportunities.

Our sustainability strategy and sustainability management activities are designed to address today’s material sustainability topics, challenges, and opportunities – in other words, the relevant impacts that our Company has on our stakeholders, the environment, and society, and the impacts that the environment and society has on it. We ensure this is in fact the case by basing the action areas for our sustainability strategy on a materiality analysis.

**RESPONSIBLE CORPORATE MANAGEMENT**

Acting Responsibly

Compliance and Anti-corruption

**Sustainability Strategy and Management**

EU Taxonomy

## New Developments

In fiscal year 2021, the “Customer-related Matters and Product Responsibility” action area focused primarily on continuously enhancing customer satisfaction and on 5G. We continued the key groundwork for constructing Germany’s fourth mobile network, which will be based on innovative OpenRAN technology. Building our own, innovative network infrastructure also means that our digital responsibility is increasing. Our main goals in the “Corporate Digital Responsibility” action area were to ensure and promote digital inclusion. At the same time, data privacy and information security also played a major role. Activities in the “United Internet as an Employer” action area were dominated by the issues of recruiting and retaining young talent, and diversity and equal opportunities. For example, we came first in the annual “Best Place to Learn” awards and focused on systematically enhancing topics in the areas of gender equality and LGBTIQ+. We also held our first Diversity Days – a three-day conference featuring a mix of presentations, workshops, and discussions on this issue. In the “Climate and Environmental Protection” action area, we moved to expand our internal data capture operations and expand the use of renewable energies at our office locations. In addition, we focused on the analysis required by the EU Taxonomy. Our “United Internet as a Business Partner” action area addressed the growing interest in our supply and value chain<sup>(1)</sup>, especially in light of the new German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG). We continued expanding and enhancing our measures to implement due diligence requirements here.

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See “Customer-related Matters and Product Responsibility” on 27ff.

See “Corporate Digital Responsibility” on page 39ff.

See “United Internet as an Employer” on page 60ff.

See “Climate and Environmental Protection” on page 81ff.

See “United Internet as a Business Partner” on page 96ff.



See EU Taxonomy on page 23f.



See “United Internet as a Business Partner” on page 96ff.



See also the “Annex” on page 116 f.

## Increasing Level of Regulation on Sustainability Topics

We developed and documented the information required by the new EU Taxonomy Regulation in the course of preparing this sustainability report. Working together with all segments of the United Internet Group and with the assistance of an external consultancy, we carefully analyzed all relevant revenue, CapEx, and OpEx, and then classified and documented them as required by the Regulation.

In addition, we prepared in the reporting period for the implementation of the new due diligence requirements under the LkSG, which was passed by the Bundestag (the German Parliament) in June 2021 and whose provisions will apply at the United Internet Group from 2023 onwards. This was done on the basis of the National Action Plan for the Implementation of the UN Guiding Principles on Business and Human Rights (“NAP”), and the first measures for this were presented. Among other things, these include process-driven preventive measures in our own operations and the implementation of a grievance procedure. United Internet will use this as a basis to determine new action areas in the coming year and will implement any new measures required.

The findings of a readiness assessment were also largely implemented for this report and the information required by the CSR-RUG flagged throughout.

<sup>(1)</sup> Our supply and value chain presents the activities and actors involved in developing, producing, distributing, delivering, and providing support for a product or service. Generally speaking, this is not a linear process as suggested by the image of a chain, but rather a complex network of actors and suppliers who are themselves interconnected. Nevertheless, we mainly use the term “value chain” in the following for reasons of simplicity.

## Materiality Analysis: Topics and Action Areas

NfS: Material Topics



See "About this Report"  
on page 119 ff.

GRI 102-44

GRI 102-46

GRI 102-47

We provide details of the process we use to determine our material topics, including our definition of materiality, the criteria examined, and our materiality matrix in the section entitled "About This Report."

We used the results of our materiality analysis to continuously enhance the topics within our sustainability action areas, and to determine where their impacts arise and what areas of United Internet offer suitable starting points for their management. In line with the CSR-RUG, we perform a risk assessment of these aspects with respect to our own business activities, our products and services, and our business relationships<sup>(1)</sup>. The following overview provides supplementary information on how the topics relate to the aspects contained in the CSR-RUG. The action areas are reflected in the structure of the report.

(1) German Accounting Standard (GAS) 20 specifies that reporting on risks linked to business relationships relates "in particular to the supply and subcontracting chains."



**RESPONSIBLE CORPORATE MANAGEMENT**

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**Material Sustainability Topics and Identification of Action Areas**

Non-financial aspects from the CSR-RUG	Material topics identified	Action areas: Where do impacts arise? Where are the starting points in the Company?		
		Own business activity	Products/ services	Business relationships
ENVIRONMENTAL MATTERS	Energy	Climate and Environmental Protection		United Internet as a Business Partner
	Materials			
	Emissions			
	Transportation			
	Supplier environmental assessment, environmental responsibility in the value chain			
	Environmental impact of our products and services		Customer-related Matters/ Product Responsibility	
EMPLOYEE-RELATED MATTERS	Employment	United Internet as an Employer		United Internet as a Business Partner
	Occupational health and safety			
	Training and education			
	Diversity and equal opportunity			
	Equal pay for men and women			
	Equal treatment			
	Evaluation of suppliers by working conditions, social responsibility in the value chain			
RESPECT FOR HUMAN RIGHTS	Human rights	United Internet as an Employer, Corporate Digital Responsibility		
ANTI-CORRUPTION AND BRIBERY MATTERS	Compliance and anti-corruption (including behavior in accordance with competition law, legally compliant marketing)	Responsible Corporate Management		
SOCIAL MATTERS/ CUSTOMER-RELATED MATTERS	Customer health and safety	Customer-related Matters/Product Responsibility		
	Labeling of products and services <sup>(1)</sup>	Corporate Digital Responsibility		
	Protection of customers' privacy			
	Information security			
	Participation in digitalization			
	Data control/sovereignty			
	Digital literacy	Our Social Commitment		
Social commitment <sup>(2)</sup>				

(1) This topic is also partly included in the chapter entitled "Climate and Environmental Protection" (e.g., in relation to customer hardware).

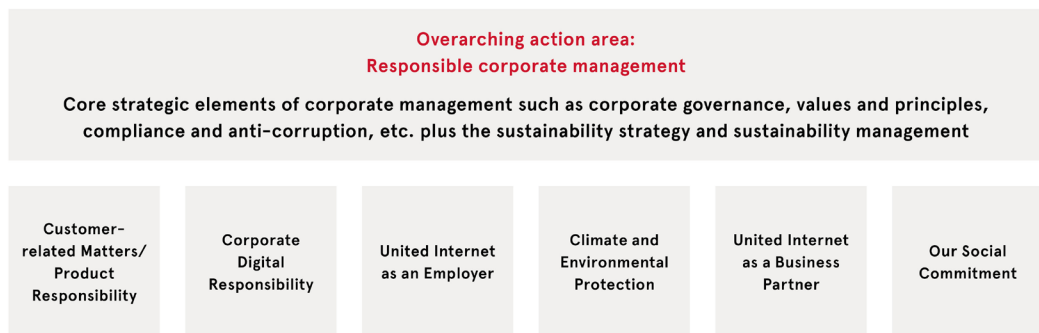
(2) This topic was not identified as material, but is reported voluntarily due to its importance for United Internet.

## Sustainability Strategy: Action Areas and Goals

### Action Areas

NfS: Material Topics

We identified the following action areas by combining the material topics with the United Internet Group's structures and activities:



See page 27ff.

#### ■ Customer-related Matters and Product Responsibility

Customer demands in relation to internet access and applications are increasing all the time, and we can only hope to persuade customers to stay loyal to our products and hence to us in the long term if they are satisfied. This is why customer feedback and customer satisfaction are so important to us. We use numerous initiatives to improve customer satisfaction, including new products and rate plans, transparency, and an even more powerful and comprehensive offering. This is why we are continuously expanding our fiber-optic network and product range, for example, and why we also enter into business combinations.



See page 39ff.

#### ■ Corporate Digital Responsibility

As digitalization gathers pace, so do both the opportunities and risks for users, such as improved, customized services on the one hand and the danger of data theft and vulnerabilities on the other. We aim to enable society to participate in the digitalization process, and to ensure that this can be done safely. We build on our georedundant data centers to constantly extend data privacy and information security on the internet. In addition, we offer users tangible added value made in Germany in the form of innovations such as netID (the European log-in standard) and our "intelligent mailbox."



Georedundancy: A minimum of two copies of data are stored in data centers at different locations. This results in 99.99% availability.

#### ■ United Internet as an Employer

As an employer we also operate in a dynamic, fast-growing environment in which we aspire to be an innovator, and where we face a highly competitive market for specialists. We aim to be a fair and attractive employer and to help our employees grow. To do this, we want to create a working environment that enables all staff to contribute what they know and to take advantage of development opportunities and the freedoms they have in their work. Our corporate culture is built around mutual support, respect, and embracing diversity, along with flat hierarchies that aid fast decision-making.



See page 60ff.

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■ **Climate and Environmental Protection**

As an internet specialist, our offering revolves around our network infrastructure and our data centers. The latter are responsible for by far the bulk of energy used within the Group, especially since they are operated at georedundant locations, in line with data privacy and information security requirements. This energy usage and the resulting carbon emissions impact the environment and the climate. We therefore aim to use resources efficiently and to contribute to climate protection. We have been investing in sustainable energy usage in key areas for many years, and are implementing a wide range of efficiency improvement measures; in addition, we source renewable energy and only still offset non-renewable electricity in a few areas.



See page 81ff.

■ **United Internet as a Business Partner**

As a telecommunications and internet provider, we work with a large number of business partners. These include network service and IT hardware providers, and sales and shipping partners. We aim to create value together with our business partners through strong, fair partnerships and to meet our due diligence obligations across the entire supply and value chain. The integrity of our business partners is extremely important for us – both to avoid risks that could result from business relationships and to establish the trust that is needed for long-term business relationships and for taking responsibility together. A Code of Conduct for Business Partners ensures this is the case.



See page 96ff.

■ **Our Social Commitment**

Business success is only possible in a functioning society. We are part of society and are committed to helping ensure its stability and ability to meet future challenges. This is why our United Internet for UNICEF foundation supports United Nations Children's Fund projects across the world. What is more, our partnerships with AfB gGmbH and GDW are proof of our commitment to inclusion.



See page 104ff.

**Relevance to the UN Sustainable Development Goals (SDGs)**

We refer to the UN SDGs where appropriate in a number of places in this report. The SDGs comprise 17 objectives for sustainable development that aim to end poverty, protect the Earth, and ensure prosperity for all. They were resolved in 2015 by the United Nations (UN) member states, with the goal being to implement them by 2030. We use the SDG symbols to indicate the action areas in which we can contribute the most to reaching specific SDGs. United Internet's sustainability strategy focuses on SDGs 8, 9, 12, and 13. We also refer to additional SDGs and how we contribute to them in the individual chapters.



See the [UN SDGs](#).

<p><b>8</b> DECENT WORK AND ECONOMIC GROWTH</p>	<p>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.</p>	<p><b>9</b> INDUSTRY, INNOVATION AND INFRASTRUCTURE</p>	<p>Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.</p>
<p><b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION</p>	<p>Ensure sustainable consumption and production patterns.</p>	<p><b>13</b> CLIMATE ACTION</p>	<p>Take urgent action to combat climate change and its impacts.</p>

## Enhancements to the Action Areas

We have identified points of reference for the individual action areas and topics so as to develop goals and measures, and achieve progress.

Goals/measures	Deadline	Status <sup>(1)</sup>
<b>SUSTAINABILITY STRATEGY AND MANAGEMENT</b>		
Update materiality analysis	2022	In preparation
Adopt systematic approach to data capture for sustainability reporting	Ongoing	Implementation
<b>CUSTOMER-RELATED MATTERS/PRODUCT RESPONSIBILITY</b>		
Intensify and permanently strengthen cross-functional cooperation	Ongoing	Implementation
<b>CORPORATE DIGITAL RESPONSIBILITY</b>		
Raise our Corporate Digital Responsibility profile	2020 onwards	Implementation
Enhance and extend our information security management system	Ongoing	Implementation
Enhance the security measures in our internal IT service	Ongoing	Implementation
<b>UNITED INTERNET AS AN EMPLOYER</b>		
<b>Diversity:</b>		
Enhance our road map to increase our Group-wide quota for women in the two top management levels below United Internet AG to above 18%	Ongoing	Implementation
Expand our policy for managing and promoting diversity	Ongoing	Implementation
<b>Professional development:</b>		
Standardize monitoring of our training measures	Ongoing	Implementation
<b>Health management:</b>		
Expand our health program	Ongoing	Implementation
<b>CLIMATE AND ENVIRONMENTAL PROTECTION</b>		
Calculate our carbon footprint	2020 onwards	In preparation
Implement additional energy efficiency measures	Ongoing	Implementation
Reduce carbon emissions from fuel consumption	Ongoing	Implementation
Identify additional potential electricity and materials savings	Ongoing	Implementation
<b>UNITED INTERNET AS A BUSINESS PARTNER</b>		
Map our supply/value chain	2020 onwards	In preparation

(1) Please see the relevant chapters or sections for further information.

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# Sustainability Management

## Organization of Sustainability Management

Sustainability management throughout the United Internet Group is coordinated by a team from the Compliance & Sustainability department. The tasks involved include strategic development, reporting, and answering ESG rating agency queries, along with ensuring and optimizing the quality of the data needed for this. The Sustainability Team liaises with core functions and relevant units in the segments, and supports these in assessing nonfinancial topics in their various business activities, providing information, and ensuring that the entire Group complies with its business responsibilities.

GRI 102-20

The Sustainability Team reports to United Internet AG’s CFO, who is also responsible for preparing the sustainability report. In addition, the Company’s Management Board addresses current sustainability-related topics and decisions in the course of the fiscal year. United Internet’s Supervisory Board discharges its responsibility of oversight by independently examining the consolidated nonfinancial report (“nonfinancial statement”) to establish whether it complies with the law, and is due and proper and appropriate.


## Stakeholder Dialog


Our ability to do business depends on our successful cooperation with a wide range of stakeholders. We liaise with these groups using a variety of different platforms and formats, with the aims of reinforcing communication and cooperation, and taking our stakeholders’ interests into account.


NfS: Social Matters and Employee Matters


- **Customers:** We focus systematically on customer needs and satisfaction. This is why we collect feedback in numerous areas and liaise with customers using surveys and during service calls, among other things. Test users and test buyers provide valuable feedback on new products.
- **Investors:** Investors are a key stakeholder group for United Internet. Our Investor Relations department and our Management Board are in regular contact with them in the form of one-on-one discussions and road shows. We repay investors’ trust in us by ensuring open, transparent reporting.
- **Employees:** Our employees are the key to our success. Only by leveraging their knowledge, skills, and dedication can we continue to develop and to achieve long-term success. Employee feedback is important for us, which is why we regularly perform employee surveys, use these to identify measures to be taken, and inform staff of the progress made. In addition, the Management Board is in regular direct contact with employees, e.g., using internal roadshows, which were held virtually in 2021.
- **Business partners:** Our business requires us to work together with a large number of business partners and suppliers. This includes wholesale service partners, hardware suppliers, call center service providers, and shipping partners, for example. Among other things, we conduct one-on-one discussions with these partners and also help call center service providers, for example, to train their employees.

GRI 102-12  
GRI 102-40  
GRI 102-42  
GRI 102-43  
GRI 102-44

 See “Customer-related Matters and Product Responsibility” on page 27ff.

 See the [Annual Report](#) and the [United Internet website](#).

 See “United Internet as an Employer” on page 60ff.

 See “United Internet as a Business Partner” on page 96ff.

GRI 102-13



See "Our Social Commitment" on page 104ff.

NfS: Dialog with Local Communities/at Regional Level



See "Stakeholder Survey" on page 121.

- **Politicians and associations:** We aim to maintain a dialog with political decision-makers and government authorities so as to create a framework for a successful digital economy in Germany. One particular issue for us is ensuring competition, which acts as a driver for innovation, investment, and consumer benefits. This is why we are a member of associations such as VATM<sup>(1)</sup>, Bitkom<sup>(2)</sup>, BREKO<sup>(3)</sup>, BVDW<sup>(4)</sup>, and eco<sup>(5)</sup>. In addition, specialist departments are active in relevant associations and bodies.
- **Non. governmental organizations:** Our United Internet for UNICEF foundation has worked with the United Nations' Children's Fund for around 15 years now to collect donations and recruit new sustaining members.
- **Local communities:** We welcome dialog with local communities and the wider population at our locations. Since we are an internet and telecommunications provider, our operating locations do not have a significant impact. On the contrary: We create jobs outside major German cities at locations such as Montabaur or Zweibrücken.

In addition, our stakeholders' opinions and decisions are a key factor both in shaping our sustainability management activities and in determining what goes into our sustainability report. We held a separate dialog with selected stakeholders on this.

(1) Verband der Anbieter von Telekommunikations- und Mehrwertdiensten e. V.

(2) Bundesverband Informationswirtschaft, Telekommunikation und neue Medien e. V.

(3) Bundesverband Breitbandkommunikation e. V.

(4) Bundesverband Digitale Wirtschaft (BVDW) e.V.

(5) Verband der Internetwirtschaft e. V.

## EU TAXONOMY

Nfs: Proportion of environmentally sustainable economic activities pursuant to Article 8 of the Taxonomy Regulation (Regulation (EU) 2020/852)

The EU Taxonomy Regulation is a uniform, binding system for classifying economic activities according to their environmental sustainability. Companies are obliged to report on the results of this classification on an annual basis. Article 9 of the EU Taxonomy sets out six environmental objectives. Concrete requirements (technical criteria) for environmental sustainability already exist for the first two of these ("climate change mitigation" and "climate change adaptation") (Commission Delegated Regulation (EU) 2021/2139). Reference will be made to these later on.

### Identification of Taxonomy-eligible Economic Activities

Article 8 of the EU Taxonomy Regulation in conjunction with section 289b(1) of the HGB requires United Internet to report in accordance with the EU Taxonomy.

For the 2021 reporting period, it must be established whether economic activities performed by United Internet are described in the annexes to Commission Delegated Regulation (EU) 2021/2139 ("Taxonomy eligibility"). The EU Taxonomy refers both to activities relating to United Internet's core business areas (e.g., data processing using data centers) and to investments and operating expenditure that are not directly linked to its core business areas (e.g., in relation to passenger cars and buildings).

Consequently, in the EU Taxonomy's first year of application only the proportion of Taxonomy-eligible and Taxonomy non-eligible economic activities in the Company's revenue, capital expenditure (CapEx), and operating expenditure (OpEx) must be disclosed. The EU Taxonomy can be construed in different ways in many areas and is currently leading to different assessments and interpretations when it comes to determining Taxonomy eligibility. For example, the expansion of its fiber-optic network, 5G, and the use of its own fiber-optic networks are among United Internet's core economic activities. However, there is no consensus opinion yet to whether these activities fall within the meaning of economic activity 8-2 "Data, driven solutions for GHG emissions reductions," and they are therefore assessed differently by companies. As a general principle, the interpretations used in United Internet's analysis stick closely to the wording and the Company has therefore not classed these activities as Taxonomy-eligible in the first instance. However, the EU Taxonomy's dynamic environment may lead to different assessments next year.



See [ESMA 32-63-1186](#).

United Internet has examined all Group segments for Taxonomy-eligible activities. It did this by analyzing Taxonomy eligibility on the basis of the descriptions of the activities for the two environmental objectives of "climate change mitigation" (Annex 1) and "climate change adaptation" (Annex 2) and of the services offered in the segments. In a next step, the assessments were then discussed in detail with the segments. As a result, the following economic activities in Annex 1 have been identified as Taxonomy-eligible for the 2021 reporting period:

Activity 8-1 "Data processing, hosting and related activities" is the most relevant activity for United Internet in relation to the EU Taxonomy. United Internet's Business Applications Segment offers domains, home pages, web hosting, servers, cloud solutions and e-shops, group work, and online storage, among other things. This segment's offering is therefore responsible for the majority of Taxonomy-eligible activities. The Consumer Applications Segment is home to United Internet's consumer applications such as online storage and personal information management. Activities relating to activity 8.1 have also been identified in this segment. In addition, the Consumer Access Segment also has a small number of Taxonomy-eligible activities within the scope of 8.1 in the form of its online storage offering.

The volume of activities covered by the description of the activity is currently still open to interpretation. For this reason, United Internet has identified those activities (such as online storage) in which hosting and data storage play a key role as Taxonomy-eligible activities for the 2021 reporting period. Other activities merely involving data transfer have not been reported under activity 8.1 for the 2021 reporting period.

Above and beyond this, only those hosting and data storage activities that are performed in the Company's own data centers have been regarded as Taxonomy-eligible. In other words, hosting and data storage activities that are performed in third-party data centers are not regarded as Taxonomy-eligible. Since it was not possible to make assignments at the level of individual transactions, the proportion of Taxonomy-eligible revenue was determined using an allocation key. The allocation was based on the ratio of electricity used by the Company's own data centers to that used by third-party data centers. Electricity consumption serves here as an indicator of the volume of data processing performed (IT load). In a first step, electricity consumption by the Company's own data centers was adjusted up front for the power usage effectiveness (PUE) factor in order to avoid distorting the allocation. This enabled an efficiency-adjusted IT load that is comparable to that for the third-party data centers to be used as a metric. This total amount is systematically analyzed and disclosed under the ISO 50001 energy management system standard that is used to certify our own data centers. The approach minimized any distortions resulting from differences in energy efficiency levels between the Company's own and third-party data centers.

In addition, horizontal issues and infrastructure-related topics were identified. For example, the Group performs Taxonomy-eligible activities relating to activities **6-5 "Transport by motorbikes, passenger cars and light commercial vehicles"** and **7-7- "Acquisition and ownership of buildings"**

United Internet's activities were also examined to determine whether they relate to the environmental objective of "climate change adaptation" (Annex 2). A detailed examination revealed that, in individual cases, activities could be allocated to this environmental objective, e.g., in connection with preventing flood damage where new data centers are built. However, the costs for this are already captured in the CapEx figures under Annex 1. The second FAQs dated February 2, 2022 (Draft Commission Notice) state that the KPIs do not have to be disclosed separately for the two environmental objectives in the initial reporting period. As a result, all figures for revenue, CapEx, and OpEx have been disclosed without breaking them down by environmental objective.



See [FAQs Draft Commission Notice](#), page 11 item 10.

## List of Taxonomy-eligible KPIs



See page 118 of [United Internet AG's consolidated financial statements](#).

The key performance indicators (KPIs) reported pursuant to the EU Taxonomy Regulation (revenue, CapEx, and OpEx) are based on the figures given in United Internet AG's consolidated financial statements. United Internet AG's consolidated financial statements were prepared in accordance with the International Financial Reporting Standards (IFRSs) as adopted by the European Union (EU) and the relevant supplementary regulations set out section 315e (1) of the German Commercial Code (Handelsgesetzbuch – HGB).

The revenue, CapEx, and OpEx identified as associated with Taxonomy-eligible activities and the total amounts used were agreed individually at Group level together with the overall category they belong to, allowing potential double-counting to be checked and prevented.



■ **Revenue**

The EU Taxonomy Regulation defines turnover (revenue) as the revenue recognized pursuant to IAS 1.82(a). The “revenue” KPI disclosed for the United Internet Group represents the ratio of the revenue from Taxonomy-eligible economic activities to total revenue. The total revenue can be taken from the income statement in United Internet AG’s consolidated financial statements (see the table on page 153 in the “Explanations of items in the income statement– 5. Sales revenue/segment reporting” section).



See page 153 of [United Internet AG’s consolidated financial statements.](#)

■ **CapEx**

The figure for CapEx is based on the additions to property, plant, and equipment and intangible assets during the fiscal year under review before depreciation, amortization, and any remeasurements; no adjustments are made to the fair values. It also includes the additions to property, plant, and equipment and intangible assets resulting from business combinations (application of IAS 16, 38, 40, and 41, and IFRS 16). Purchased goodwill is not included. The overall figure for capital expenditure used for the EU Taxonomy is disclosed in the consolidated financial statements under the “Explanations of items in the income statement– 5. Sales revenue/segment reporting” section; see the last column (“United Internet Group”) of the line item entitled “Investments in intangible assets and property, plant and equipment (without goodwill)” in the table on page 153.



See page 153 of [United Internet AG’s consolidated financial statements.](#)

The CapEx KPI determined for the United Internet Group represents the proportion of capital expenditure that is associated with Taxonomy-eligible economic activities or that relates to the purchase of products or services from Taxonomy-eligible economic activities enabling the target activities to become low-carbon or to lead to greenhouse gas reductions. The additions were allocated to the Taxonomy-eligible economic activities on the basis of the description above.

■ **OpEx**

Operating expenditure covers the direct, non-capitalized costs that relate to research and development (R&D), building renovation measures, short-term leases, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of assets of property, plant, and equipment by the Company or third parties that are necessary to ensure the continued and effective functioning of such assets.

The United Internet Group’s OpEx KPI represents the proportion of operating expenditure (as defined by the EU Taxonomy) associated with Taxonomy-eligible economic activities or that relates to the purchase of products or services from Taxonomy-eligible economic activities. The Taxonomy-eligible proportion is determined by analyzing the accounts for building renovation measures, short-term leases, and maintenance and repair, and assigning them to the identified economic activities pursuant to the EU Taxonomy.

EU Taxonomy KPIs - United Internet Taxonomy eligibility							
		Revenue ("turnover")		CapEx		OpEx	
		in €m	in %	in €m	in %	in €m	in %
<b>Total figures for the United Internet Group</b>		<b>5.646,2</b>	<b>100,0%</b>	<b>437,6</b>	<b>100,0%</b>	<b>74,6</b>	<b>100,0%</b>
of which Taxonomy-eligible	8.1 Data processing and hosting	907,4	16,1%	99,9	22,8%	21,4	28,6%
	6.5. Transport by motorbikes, passenger cars and commercial vehicles	0,0	0,0%	4,5	1,0%	1,8	2,4%
	7.7. Acquisition and ownership of buildings	0,0	0,0%	111,5	25,5%	0,0	0,0%
	<b>Total</b>	<b>907,4</b>	<b>16,1%</b>	<b>215,9</b>	<b>49,3%</b>	<b>23,1</b>	<b>31,0%</b>
of which Taxonomy non-eligible		4.738,8	83,9%	221,6	50,7%	51,5	69,0%

The majority of revenue from **activity 8-1** is generated in the Business Applications Segment and covers hosting activities such as online data storage. In line with this, the associated Taxonomy-eligible CapEx primarily relates to property, plant, and equipment and intangible assets in this segment (and in particular investments in servers and data centers). The Taxonomy-eligible OpEx for activity 8.1 relates primarily to repairs and maintenance in connection with plant and equipment and software in the data center area. The proportions of revenue generated in connection with activity 8.1 were adjusted in all cases by the abovementioned allocation key so as only to disclose the proportion of activities relating to the Company's own data centers.

The proportion of CapEx and OpEx in connection with **activity 6-5** is attributable in particular to vehicle fleet management at Group level.

The CapEx in connection with **activity 7-7** primarily comprises IFRS 16 Leases items in the Group's individual segments.

**CUSTOMER-RELATED MATTERS AND PRODUCT RESPONSIBILITY**

**Management Approach**

Customer Satisfaction: Consumer Access	Customer Satisfaction: Consumer Applications
Customer Satisfaction: Business Access	Customer Satisfaction: Business Applications
	Product Responsibility

# CUSTOMER-RELATED MATTERS AND PRODUCT RESPONSIBILITY

## Management Approach

### Materiality, Impact, and Risks

As an internet and telecommunications provider, we operate in an extremely dynamic market environment. The United Internet Group’s success is based on its core competency: the ability to early identify and systematically leverage customer wishes, trends, and hence new markets at an early stage. Our existing business relationships with millions of customers and users ensure we keep our ear close to the ground. In addition, our in-house product development capabilities, highly flexible approach, and powerful marketing and sales operations help us bring innovations to market independently – and in many cases more quickly than other players.

NfS: Impact of the Company’s Business Activities: Policies

GRI 103-1

Our relationships with our customers are based on trust. Data privacy, information security, and round-the-clock access to highly skilled contact staff all help to make us a reliable partner. The reason is simple: Customer satisfaction is a unique selling proposition and hence a core way of ensuring our competitive ability and long-term success. This is why we give continuously assessing and managing customer satisfaction a high priority – not only is it important to our customers, but it is also relevant for our investors and employees.

We focus on our customers in everything we think and do, and aim to provide compelling products and services.

Potential risks in connection with customer satisfaction and the sales market include the possible need to make changes to our business model or our pricing policy (political or legal risks). In addition, new developments might hit the market too late, or might not be accepted as expected by the intended target group. Equally, new competitors entering the market could pose a risk to our market share, growth objectives, or margins (technology, market, or reputational risks). What is more, United Internet occasionally enters upstream or downstream markets when diversifying its business model or expanding its value chain. One example is its 2019 auction purchase of mobile frequencies and the construction of its own 5G mobile network.

### Goals and Measures

The purpose of our management approach is to focus on our customers in everything we think and do, and to provide them with compelling products and services. By doing so, we aim to systematically and permanently increase customer satisfaction.

NfS: Policies Pursued

GRI 103-2

United Internet manages more than 67 million customer accounts worldwide. Since customers in the different segments have different requirements, customer satisfaction is measured using segment-specific metrics and performance indicators such as the customer sentiment score and net promoter score (NPS), and is managed by dedicated teams using specifically tailored structures and processes. We conduct regular customer surveys, market research, and analyses to obtain feedback from our customers. Our customer satisfaction figures are used in our executives’ performance reviews and variable compensation components.

What is more, the responsible segment board members are involved regularly and in detail in this issue. These executives generally report directly to the CEO of United Internet AG or the other company they work for.

In addition, customer service is extremely important to us. This function not only is strongly represented within the organization itself but is also assisted by approximately 4,000 external service agents who help provide customer care.

Other customer-related matters apart from customer satisfaction include health questions relating to mobile frequencies and youth protection. Details of these can be found in the "Product Responsibility" section of this chapter.

## Results and Assessment

NfS: Results of Policies Pursued

GRI 103-3

Please see the following sections on the individual segments for details of how we measure and manage customer satisfaction and other customer topics. Going forward, we plan to harmonize the indicators across the various segments so as to be able to report an overarching performance indicator at Group level.

## Contribution to the SDGs



Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.



Ensure sustainable consumption and production patterns.

## Customer Satisfaction in the Consumer Access Segment: 1&1 AG

### Managing Customer Satisfaction Using the Customer Sentiment Score

NfS: Nonfinancial Key Performance Indicator

The Consumer Access Segment had 15.43 million customer contracts as of the 2021 year-end (2020: 14.83 million; 2019: 14.33 million). Of this figure, 11.19 million (2020: 10.52 million; 2019: 9.99 million) were attributable to the mobile internet business and 4.24 million (2020: 4.31 million; 2019: 4.34 million) to broadband connections. The topic of customer sentiment is firmly anchored in our Company and is a key part of our daily work, both for our premium 1&1 brand and for Drillisch Online's discount brands.

We capture and measure customer sentiment in the Consumer Access Segment using the customer sentiment score. This is determined separately for each product (DSL and mobile), but also at an overarching level at selected contact points along the customer journey. Customers who have opted in receive an e-mail inviting them to take part in an online survey. In addition, customers can take part in surveys on the contact points concerned via the Control Center and our website. Each survey asks a

**CUSTOMER-RELATED MATTERS AND PRODUCT RESPONSIBILITY**

Management Approach	Customer Satisfaction: Consumer Applications
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question relating to customer satisfaction, and the customer can answer on a five-point scale ranging from “extremely satisfied” to “extremely dissatisfied”. The answers are used as the basis for the score in question.

The Customer Experience unit is at the heart of managing customer satisfaction at 1&1: It establishes customers’ needs through surveys and by observing the market and the competitive environment, and actively makes the results known within the organization. At Drillisch Online, the units responsible are Business Process Management (BPM) and Quality Management (QM Development).

The scores produced are more than mere figures for us: They are core measurements that we use to guide our daily work. Our main objective is to increase customer satisfaction and create compelling customer experiences.

### Measuring Customer Satisfaction

We constantly measure customer sentiment for all relevant customer contact points and customer journeys throughout the customer life cycle. These measurements are mostly event-driven, i.e., they are made immediately after a customer journey (e.g., a change in rate plan) or following some other form of contact with the organization (e.g., Customer Service). In total, we receive roughly 87,800 customer feedback items per month for 1&1 and 21,300 or so for Drillisch Online’s brands.



Customer journey: The customer experience when contacting and dealing with the organization.

Qualitative, in-depth interviews complement the quantitative customer surveys. The aim here is to understand what motivates customers and to use these insights to optimize product and service design. Comprehensive data analysis is used to validate and quantify all insights gained from customers.

We use these detailed findings to identify potential improvements and develop measures designed to specifically increase customer satisfaction.

Good service is a high priority for customers in all areas. In October 2021, a FOCUS-MONEY study has confirmed that our service hotline offers this, giving 1&1 the “Fairest Customer Hotline” award and a score of “very good”. A number of different elements from the customer contact process were used during assessment. These ranged from finding the right service number through availability down to how customer issues were processed.

The two Drillisch brands smartmobil.de and winSIM placed first and second in the Top Service Quality 2021/2022 survey conducted in fiscal year 2021 by online portal “Testbild.” They came top of the “mobile network provider category” with scores of “very good.”

### Managing and Enhancing Customer Satisfaction

Customer satisfaction doesn’t stop at departmental boundaries, which is why joint teams from different areas are used to enhance it.

Clear responsibilities for changes in customer sentiment exist for all customer journeys and contact points. At 1&1, measures designed to enhance the customer experience are developed together with the Customer Experience unit, and their impact on customers is then assessed. At Drillisch Online, customer ideas and suggestions in the areas of quality and project management are included in its ideas management activities. Both units are continuing their work to enhance customer satisfaction and enable customers to get even stickier with their Personal Service World. Suggestions are reviewed and then introduced, and modifications to IT projects are documented and implemented.

Trends in customer sentiment, the status of the measures identified, and new ways of enhancing customer satisfaction are discussed every month at various group meetings at 1&1 AG, up to and including at Management Board level.

## Uncompromising Customer Orientation at 1&1

We ensure a high level of customer satisfaction by focusing squarely on customer needs. One way in which we do this is to use qualitative and quantitative market research to test and evaluate the impact on customers of ideas for new products, campaigns, service concepts, and the like before these are introduced. A total of 48 ad hoc market research studies were performed in 2021. These are conducted both internally and externally. Market studies that involve polling non-customers as well as customers are performed with the assistance of an external institute. In addition, we actively engage with our customers on a variety of topics using quarterly dialogs and focus groups. This ensures all departments stay close to them and understand their needs even better.

Our **Customer Guidelines** help staff to put customer orientation at the heart of what they think and do every day, and so ensure this approach becomes second nature within the Company:

- **“We recognize and understand customer needs”**

We hear, see, and understand our customers and their needs. And we show empathy in our dealings with them.

- **“We implement customer needs”**

We focus on what our customers need in our daily work and use this knowledge to develop the right products, services, and service offerings. We work together as a team and as partners to serve our customers, and are fair and transparent.

- **“We delight our customers”**

We ensure satisfaction by meeting our customers’ needs, and delight them by exceeding their expectations. This delight is the driving force behind our daily work and a key factor for our long-term success.

What is more, 1&1 received a “very good” rating in the 2021 broadband and fixed network test run by specialist magazine “connect” and saw a clear year-on-year improvement in its score, which rose from 902 to 912 out of a potential total of 1,000 points.

### The 1&1 Service Card

The 1&1 Service Card is another element driving customer satisfaction, as well as a way of differentiating ourselves in the market. Our customers receive a 1&1 Service Card listing all the services that they can use free of charge with each order.

These include e.g., the **1&1 Trade. in Bonus** and our 24-hour **Replacement Service**.

- The 1&1 Trade-in Bonus allows customers to send in their old smartphones, tablets, or laptops and receive a bonus corresponding to the fair value of the device concerned. The old devices are recycled by 1&1.
- It doesn’t matter what accident befalls their 1&1 smartphone, tablet, or laptop: Our customers can phone and surf again comfortably the next day thanks to the 1&1 Replacement Service. Where a

**CUSTOMER-RELATED  
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Management Approach	Customer Satisfaction: Consumer Applications
<b>Customer Satisfaction: Consumer Access</b>	Customer Satisfaction: Business Applications
Customer Satisfaction: Business Access	Product Responsibility

device has been damaged, we will replace it with an identical one free of charge within 24 hours. We recycle the faulty device and use components in repairs, for example.

## Continuous Development Leads to More Customer Experiences

We aim to always offer our customers the best possible experience and to do our best for them at all times. This is why we constantly develop new service products that add value for them. These include:

- **The 1&1 Priority Hotline**  
1&1 is available to help you around the clock. In person, not via a bot.
- **The 1&1 WLAN Promise**  
One call is all it takes for a 1&1 expert to help with installing the WLAN for all your devices.
- **The 1&1 Replacement Service**  
Regardless of how your smartphone, tablet, or laptop was damaged, the 1&1 Replacement Service will replace it within 24 hours.

## Uncompromising Customer Orientation at Drillisch Online

Drillisch Online also aims to delight customers with its exceptional service: Our motto here is "One customer, one contact, one solution." Even though they are price-sensitive, our customers are not prepared to compromise on a first-rate, award-winning customer service that focuses on their needs:

- **Cost. effective online sales:** A tried-and-tested, secure way of making purchases online.
- **Inexpensive network access:** Although we don't currently have our own network, we use Telefónica Deutschland's state-of-the-art technology in all cases.
- **Customer recommendations pay dividends:** We offer a bonus for recruiting new customers.
- **Customer service:** Available until 10 p.m. every day, and round the clock via our ServiceWorld.

We tell the world how proud we are of what we achieve every day and of our customer service, and have what we say confirmed by independent external auditors. Our brands have been certified by TÜV Saarland (under its "TÜV-tested Online Portal" scheme), while our customer service activities have been certified as complying with the ISO 9001:2015 quality management standard. This certification was renewed until 2024 following an audit in fiscal year 2021.



See also "Corporate Digital Responsibility" on page 39ff.

In 2021, smartmobil.de added another mobile product to its range. The Shift cellphone further expands the product portfolio in the direction of more sustainable phones, complementing the Fairphone, that was already available. In addition, the option to acquire refurbished devices is displayed in a prominent position on the website. This not only conserves valuable resources but also avoids the carbon emissions that would be produced in manufacturing new products.



See also "Climate and Environmental Protection" on page 81ff.

## Customer Satisfaction in the Business Access Segment: 1&1 Versatel

### Measuring Customer Satisfaction



Carrier: A network operator.

1&1 Versatel is a business-to-business (B2B) provider of fiber-optic gigabit connections and an experienced telecommunications partner for companies from all sectors and of all sizes. We have implemented more than 50,000 business customer solutions and have more than 100 carriers as customers. Customer satisfaction is one of our core corporate goals and as such is a major factor guiding our day-to-day operations. A representative phone survey of all existing customers is conducted twice a year with the help of an external market research institute to review customer satisfaction in depth. This captures both general customer satisfaction with 1&1 Versatel's overall performance on a scale of one to five and dedicated customer feedback on our core processes. In addition, we use our net promoter score (NPS) to measure our customers' willingness to recommend us to others.

As a B2B provider, we have an extremely heterogeneous customer structure. In line with this, we analyze customer satisfaction by specific customer groups and segments. These comprise large customers, wholesale customers (i.e., other telecommunications providers such as mobile and fixed network carriers, cable network operators, national and international B2B telecommunications providers, resellers, and city and regional carriers), and small and medium-sized enterprises (SMEs). Overall satisfaction is calculated using the weighted average of the individual results for the three customer segments. We also use panel surveys to obtain a comparative benchmark of how satisfied our competitors' customers are.

This is supplemented by continuous, event-driven measurement of customer satisfaction. These measures are triggered either when customers contact our service units proactively (e.g., via the SME service hotline) or when certain measures are completed successfully. For example, in 2021 we started systematically capturing customer satisfaction in connection with fault repairs, something that has already led to valuable customer feedback in more than 2,000 cases. This information is used to identify potential improvements, evaluate the success of measures taken and further enhance our customer focus.

We also include external evaluations in our analyses. Our sister company 1&1 again received a "very good" rating in the 2021 broadband and fixed network test run by specialist magazine "connect." As in the past, the test evaluated operators' entire network infrastructure – in other words, in 1&1's case it looked not only at the Group's own lines but also at 1&1 Versatel's fiber-optic network and the lines that have been leased in some cases. As a result, the very good result also applies to 1&1 Versatel: As the 1&1 Group's infrastructure provider, we also make a significant contribution to the 1&1 Consumer Access Segment's success.



**CUSTOMER-RELATED  
MATTERS AND PRODUCT  
RESPONSIBILITY**

Management Approach	Customer Satisfaction: Consumer Applications
Customer Satisfaction: Consumer Access	Customer Satisfaction: Business Applications
<b>Customer Satisfaction: Business Access</b>	Product Responsibility

## Managing and Enhancing Customer Satisfaction

The Quality & Knowledge Management department, which reports to the Chief Operating Officer (COO), designs and coordinates all customer surveys. This unit also analyzes the results and identifies drivers for satisfaction and dissatisfaction. The resulting insights and customer needs are communicated regularly and proactively within the Company, and discussed with the management and the departments concerned. The focus in all cases is on identifying, implementing, and assessing concrete measures for enhancing customer satisfaction. Our goal here is to make our services more and more attractive for our customers and to optimize the impact that our processes have on them.

## Customer Satisfaction in the Consumer Applications Segment: GMX and WEB.DE

### Managing and Increasing Customer Satisfaction

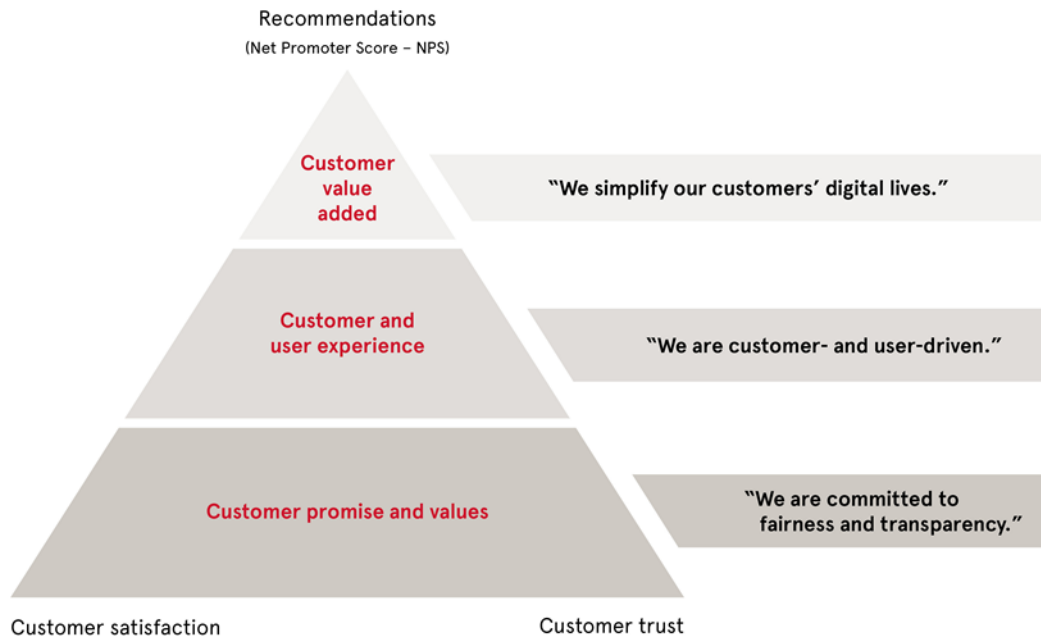
At the end of 2021, the Consumer Applications Segment had 42.79 million (2020: 41.77 million; 2019: 39.85 million) customer contracts and accounts. Of these, 40.32 million (2020: 39.40 million; 2019: 37.59 million) were free accounts and 2.47 million (2020: 2.37 million; 2019: 2.26 million) were fee-based customer contracts. We use detailed surveys to measure customer satisfaction and Net Promoter Score (NPS) scores every month for our portal brands GMX and WEB.DE. These two metrics are the key performance indicators (KPIs) for all product areas.

We ask roughly three million customers a year for feedback in the e-mail, homepage, and editorial content areas. For example, we poll them on usability, storage space, and loading speeds, on editorial topic selection, and on the content produced. In 2021, the NPS and the user satisfaction score again remained stable at their high prior-year levels of 30 points/80% respectively. In addition, we continuously measured a third core KPI, customer trust. The figure for 2021 was 88% (2020: 88%, 2019: 87%). At segment board level, the CEO and the Chief Product Officer (CPO) are closely involved in customer satisfaction measures.

NfS: Nonfinancial Key  
Performance Indicators

<b>Customer metrics</b>	2019	2020	2021
Recommendations (NPS) (in points)	25	30	30
Customer satisfaction (CSS) (in %)	80	80	80
Customer trust (in %)	87	88	88

In line with our customer-centric focus, we have developed a customer value pyramid as a way of visualizing our three core KPIs: customer satisfaction, recommendations, and customer trust:



Our internal results are regularly validated in independent studies. For example, “WirtschaftsWoche” concluded that, once again, GMX was the e-mail provider enjoying the highest level of customer trust in 2021. The business magazine worked with ServiceValue and Frankfurt’s Goethe University to produce Germany’s most extensive trust ranking. A total of 1,823 companies in 139 sectors were evaluated. It should be emphasized that the respondents to the online survey were in fact past or present customers (users, consumers, and contract partners). Just under four out of five respondents (78.5%) said that they trusted GMX. The brand was awarded the “highest customer trust” ranking for the seventh year in a row. WEB.DE’s trust index score was 72.5%, resulting in a “very high trust” award.

In addition, “FOCUS-MONEY” magazine commissioned a second cross-sector study on German customer satisfaction with specific leading brands in 2021, once again together with ServiceValue. As before, both GMX and WEB.DE received “highest customer satisfaction” ratings in the “E-mail provider” category. A total of 1,418 enterprises from 67 sectors were assessed by asking more than 279,000 consumers what exactly they thought about a very wide range of different providers. Votes were only counted if the respondents were customers of the enterprise concerned in the last twelve months.

User reviews of GMX’s and WEB.DE’s e-mail apps are another indicator of customer satisfaction. The Android versions of the apps, which are available from Google Play Store, have a rating of 4.5 out of 5 stars, while the brands’ apps in Apple’s iTunes Store score an even better 4.6 out of 5 stars.

**CUSTOMER-RELATED  
MATTERS AND PRODUCT  
RESPONSIBILITY**

Management Approach	Customer Satisfaction: Consumer Applications
Customer Satisfaction: Consumer Access	<b>Customer Satisfaction: Business Applications</b>
Customer Satisfaction: Business Access	Product Responsibility

## Customer Satisfaction in the Business Applications Segment: IONOS

The number of fee-based contracts in the Business Applications Segment had risen to 8.78 million at the end of the reporting period (2020: 8.45 million; 2019: 8.15 million). Of this figure, 4.13 million (2020: 4.06 million; 2019: 3.90 million) were in Germany and 4.43 million (2020: 4.93 million; 2019: 4.25 million) were abroad.

Our vision at IONOS is to become the most customer-focused web hosting company. Customer satisfaction is our top priority. We analyze processes from product development through to contacts with our support services so as to make the customer experience intuitive, efficient, and motivating. We treat each and every contact as an opportunity to reduce customer effort by fixing and eliminating defects and adding value for them and for our company.

We focus on our customers in everything we do. In 2021, this approach led to IONOS winning the following prizes: the Spanish service award "Elegido servicio de atención al cliente" in the "hosting" category for the eighth time in a row, and the "Élu Service Client de l'Année" prize for the best customer service in France, also in the "hosting" category, for the fourth time. In Germany, too, IONOS's customer service operations were awarded the accolade "Customer Service of the Year 2021" in the "hosting" category for the second time. Research institute ISG labeled IONOS a "Leader in the Market for Infrastructure as a Service." In 2021, IONOS received a silver European Customer Contact & Customer Service Award for the best customer insight and engagement initiative.

STRATO was also honored once again for the quality of its customer service operations, being rated a "DIE WELT Service-Champions" in the "web hosting" category for the eighth time in a row in 2021. In addition, in 2021 Strato received the "Fair Customer Hotline" from "FOCUS-MONEY". Its product quality has also been certified by a number of independent bodies.

### Managing and Measuring Customer Satisfaction

Customer satisfaction is one of our three top corporate goals. Our Customer Experience Management team submits weekly/monthly reports to the COO complete with recommended actions. The team works together on a regular basis with the IT and Product Management departments to develop solutions and measures, the priorities for which are set jointly together with all relevant Management Board-level functions. We have increased our net promoter score (NPS) – a key customer satisfaction metric – by 67% in the period since IONOS was rebranded.

In addition to tracking the customer NPS, our Customer Experience Management team has adopted a 360-degree approach to measuring customer satisfaction and quality, and to identifying ways of improving them. This includes the following:

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NfS: Nonfinancial Key  
Performance Indicators

- **The “YourVoice” customer survey portal:** We regularly ask our customers to provide feedback on a range of specific topics (17 surveys in 2021). In 2021, for the first time, this included a customer survey on sustainability designed to establish which sustainability topics are material to customers.
- **Customer journey workshops:** IONOS staff are encouraged to familiarize themselves with our products by taking part in tests, and to contribute ideas on how to improve our products and services.
- **Usability Laboratory:** We invite local customers to visit our Usability Laboratory in Karlsruhe. We use eye-tracking and screen and voice recording technology to enhance our understanding of our customers’ needs and to identify potential areas for improvement. During the pandemic, we switched to virtual usability tests (three virtual events were held in 2021).
- **Gemba Walks:** Gemba Walks are a way for executives and Management Board members to engage in regular, direct dialog with customer service agents on the ground. At present they are held using a video link because of the COVID-19 pandemic.
- **Artificial intelligence:** We use artificial intelligence to provide us with real-time insights into qualitative customer feedback obtained via social media channels, allowing us to identify problems and pain points in all markets and languages.

## The Personal Consultant concept

IONOS has not set itself the goal of reducing the number of customer contacts. On the contrary: We want to build close relationships with our customers and to help their businesses be successful. Many of them are small enterprises such as craft businesses that want a website but do not necessarily have in-depth technical knowledge in this area. Our personal consultants aim to provide these customers with the knowledge they need and to help them grow their companies.

We have worked continuously to extend and enhance this program right from the start and now also offer proactive consulting and assistance in everything from website layout to server configuration. We have found that customers have reacted positively to this service since the program was launched, with satisfaction scores and the NPS rising significantly.

We measure customer satisfaction at a number of different points in the support process. This helps us define specific optimization measures such as improvements to service levels and the percentage of customer queries solved or defects remedied. We have also set up a new omnichannel system to offer our customers additional ways of contacting us. Insights gained from the feedback given also help us to improve products, processes, and platforms in line with customer expectations.

**CUSTOMER-RELATED  
MATTERS AND PRODUCT  
RESPONSIBILITY**

Management Approach	Customer Satisfaction: Consumer Applications
Customer Satisfaction: Consumer Access	Customer Satisfaction: Business Applications
Customer Satisfaction: Business Access	<b>Product Responsibility</b>

## Product Responsibility

United Internet takes its responsibility to the environment and society seriously and has set two product responsibility priorities associated with its responsibility to customers. These are explained in more detail in the following.

NfS: Customer Health and Safety

### Responsibility for Health

1&1 AG – Germany’s fourth network operator and a new entrant to the business – will be building an innovative 5G mobile network in the coming years. The company is basing this on a new, efficient network infrastructure – OpenRAN. In contrast to traditional network architectures, the OpenRAN approach makes a strict distinction between software and hardware. As a result, network intelligence no longer resides locally at the antenna but is fully virtualized in a private cloud. Not only does this innovative network infrastructure help ensure operators remain independent of the dominant Chinese network equipment manufacturers, it also avoids the need for costly upgrades and maintenance to the base stations.


GRI 416  
GRI 416-1

We focus squarely on the benefit to our customers, and this applies in particular with respect to our new role as a network operator. 1&1 is working together with tower operators to build German’s fourth mobile network. As a result, it will largely use existing antenna locations, helping to protect the environment and reducing the resources required and the visual impact. We track the state of the art in mobile network usage – and particularly 5G – continuously and closely.

Scientists have been investigating the electromagnetic radiation produced by mobile networks for decades now, and its effects on humans have been thoroughly researched in numerous studies. The Bundesamt für Strahlenschutz (the Federal Office for Radiation Protection) has confirmed that at present there is no reliable information to suggest that the new mobile network standard could affect our health. For 5G, as for previous mobile network standards, the basic principle is that no impact on health at levels below the applicable limits has been proven.

NfS: Risk Prevention

The Federal Government is also attempting to deepen dialog with citizens and address any concerns relating to the new mobile network standard with its “Deutschland spricht über 5G” initiative. The aim is to provide information on the risks, challenges, and opportunities associated with 5G in a trustworthy and even-handed manner in online discussions, chats, and articles with the goal being to further increase trust in, and acceptance of, this forward-looking technology. Among other things, the initiative is looking at sustainability aspects such as the potential for cutting carbon emissions, since 5G uses less electricity.

  
See the [“Deutschland spricht über 5G”](#) initiative (German only).

United Internet will continue its close tracking of research on mobile network usage, and will respond in a responsible manner should any actions become necessary.

## Responsibility for Youth Protection

NfS: Respect for Human Rights

As a company, we are not just responsible for customer satisfaction, but also for those customers and internet users who still need to learn how to use our products and services. In line with this, we advocate youth protection and educating people on how they should act online.

GRI 417-1

NfS: Risk Prevention

The internet is a key part of children's and young people's everyday lives, be it for communication, researching lessons, or entertainment. However, these groups are often not media literate enough to deal with unfamiliar life issues they come across on the internet, or where inappropriate content is involved, and they lack the experience needed to assess the risks and protect themselves. Therefore, depending on their level of development, suitable measures and education on possible dangers and risks are needed to ensure they are adequately protected and that they can use the internet with confidence. We are aware that we share this responsibility as a provider of internet and telecommunications services.



See our [guidelines](#) on the United Internet Media website.

In line with this, United Internet ensures that both its own products and services and its partner offerings comply with the legal requirements for youth protection. Internal reviews are performed during product development and launches, and any necessary modifications are made, to prevent children and young people being confronted with inappropriate content. In addition, we take care to comply with youth protection legislation for both editorial content and advertising, and to find the right balance between providing a comprehensive range of information and ensuring we live up to our responsibility towards children and young people. Among other things, we do this by managing the way in which information is presented and the times at which it is transmitted.

We have appointed youth protection officers who act as the point of contact for youth protection. They advise the various departments and functions internally, handle external contacts in this area, liaise regularly with other youth protection officers, and represent Group companies in their dealings with associations and supervisory authorities. In addition, youth protection mailboxes have been set up for the IONOS, 1&1, GMX, and WEB.DE portals; the details are given in the legal notices and youth protection sections of the relevant sites. These mailboxes allow people outside the organization to contact the youth protection officers and the Youth Protection Team at any time with questions or complaints.

Above and beyond this contact information, the portals' youth protection sections provide information and tips and tricks designed to educate children, young people, and their parents, and to improve their media literacy. The material provided includes links to youth protection programs and information about counseling services and contacts for specific topics and problems associated with internet usage.

**CORPORATE DIGITAL  
RESPONSIBILITY****Management Approach**

Data Privacy

Information Security

Product Security

Data Control and  
SovereigntyParticipation in  
Digitalization

Digital Literacy

# CORPORATE DIGITAL RESPONSIBILITY

## Management Approach

### Materiality, Impact, and Risks

Customers trust us with their data for more than 67 million customer contracts. It goes without saying that this data must be protected, and its security ensured, if customers are to use our services. In line with this, guaranteeing strict security and systematically preventing unauthorized access to customer data are part of our DNA.

NfS: Social Matters and  
Respect for Human Rights

GRI 103-1

However, increasing digitalization brings more than risks that we have to protect customer data and our own data and information from: It also offers new opportunities (e.g., for product development) that we, as an internet and telecommunications company, aim to exploit.

NfS: Risk Prevention

Digitalization is transforming both the economy and society. Currently countless initiatives, conferences, studies, and charters addressing the framework for digital transformation are being produced at the political, civil society, and business levels. Many different instances stress the need for everyone to be able to participate in digitalization. In addition, members of society need enhanced digital literacy skills if they are to engage with the new opportunities independently and responsibly. The internet and digitalization also play a key role in relation to respect for human rights. After all, topics such as freedom of opinion and information, privacy, and the right to participate in cultural life are now inextricably linked with the digital arena.

We aim to enable society to participate in the digitalization process, and to ensure that this is done safely.

In the political sphere, digitalization is often discussed as a means of enabling sustainability and achieving climate goals – one that can play a decisive role in implementing climate protection measures. The infrastructure provided by the information and communications sector, and particularly data centers, is essential for this sustainability-oriented digitalization process.



See also "Climate and Environmental Protection" on page 81ff.

For the United Internet Group as an internet and telecommunications company, the ability to leverage the opportunities offered by digitalization in the form of new products and processes for its own benefit and that of its customers is a critical success factor. This creates new challenges that the Company needs to address – especially with regard to data and information security. Our heavy focus on Corporate Digital Responsibility – the motivation for numerous measures that we take – aims to ensure we meet our responsibility to protect customer data and address the process of digital transformation with all its new opportunities and risks.

NfS: Impact of Business Activity

### Goals and Measures

We aim to enable society to participate in the digitalization process, and to ensure that this is done safely. Data privacy and information security at our Group are aligned in all cases with the current requirements of, and strict standards applicable to, data privacy in Europe and Germany, which are fundamental to our business success. Closely related topics include data sovereignty and digital literacy for our customers, but naturally for our employees as well.

NfS: Policies Pursued

GRI 103-2



See also "United Internet as an Employer" on page 60ff.

Due to the importance and multifaceted nature of this topic, responsibility for it has been assigned to a number of different Management Board members. Generally speaking, it is the preserve of the Chief Technology Officer (CTO), Chief Information Officer (CIO), or Chief Procurement Officer (CPO) of the segments, who report directly to the CEO of United Internet AG or the company concerned.

The numerous measures, systems, and goals in the Corporate Digital Responsibility area are described in more detail in the following sections.

## Results and Assessment

NfS: Results of Policies Pursued

A wide range of KPIs relevant to the specific areas concerned are used to monitor success. Further details can be found in the following sections.

GRI 103-3

## Contribution to the SDGs



Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.



Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.



Strengthen the means of implementation and revitalize the global partnership for sustainable development.



**CORPORATE DIGITAL RESPONSIBILITY**

Management Approach Data Control and Sovereignty

**Data Privacy** Participation in Digitalization

Information Security Digital Literacy

Product Security

## Data Privacy

### Data Protection as a Human Right

As the process of digital transformation gains traction, the volume and complexity of the information and the digital footprints that we leave online increase. The need to protect personal data and questions as to whether data processing complies with the General Data Protection Regulation (GDPR), which came into force in 2018, are becoming more and more of an issue with the public at large and with internet users.

NfS: Respect for Human Rights and Customer-related Matters/Protection of Customer Privacy

GRI 418

We aim to enable customers to decide for themselves what happens to their data, which is why protecting personal data is both part of our DNA and a prerequisite for our business. In line with this, our products and services naturally comply with the strict data privacy standards in force in Europe and Germany. Thus we explicitly acknowledge that data privacy is an inalienable human right and take this into account at all times in our day-to-day business.

#### The General Data Protection Regulation (GDPR) and Data Privacy in Practice

Following the entry into force in May 2018 of the European General Data Protection Regulation and the associated revision of the German Data Protection Act (Bundesdatenschutzgesetz – BDSG), companies have to comply with stricter requirements regarding personal data and its processing. The law in this area is in a constant state of flux due to technological progress, new case law, and the issuance of more detailed specifications by the supervisory authorities.

The European Court of Justice (ECJ) judgment in the Schrems II<sup>(1)</sup> case resulted in the requirements governing data transfer to third countries being rewritten, or explained in greater detail, in the course of the fiscal year. As a result, both society in general and the market focused mainly on data transfer outside Europe in 2021. Day in, day out we meet the growing demand for European internet solutions and the increasing responsibility for ensuring that customer data is handled as securely and sustainably as possible. The requirements associated with the legal situation after the Schrems II case are being addressed in Group-wide projects on the topic.

In 2021, as in previous fiscal years, the work of the United Internet Group's data privacy departments focused on the optimization and modification of internal implementation measures arising from European and national data privacy regulations, including supervisory requirements. In parallel to activities focusing on operational data privacy operations (e.g., answering questions from data subjects, providing support for data privacy issues at the product level and ad hoc project work), enhancements to the structure of the data privacy organization were driven forward at high speed. In order to be able to meet future challenges and actively shape a dynamic working environment, the United Internet Group continued its drive to set up organizational responsibilities in its operating divisions. September 2021 saw the appointment of a top-level data privacy officer for the United Internet subsidiary IONOS SE and its relevant domestic and international equity interests. In addition, an independent data privacy department was created and given appropriate responsibilities. IONOS's expansion of its local data privacy organization and of independent organizational management capabilities follows the example set by other United Internet subsidiaries.

(1) Judgment of the European Court of Justice of July 16, 2020, in case C-311/18 (ECLI:EU:C:2020:559). Subject matter: Transfers of personal data to third countries for commercial purposes.

Last but not least, the companies belonging to the United Internet Group were confronted in fiscal year 2021 with legislative measures on how to deal with cookies, and the ECJ and German Federal Court of Justice rulings on the need to obtain consent for these. In December 2021, the German Telecommunications Telemedia Data Protection Act (TTDSG) entered into force. This act makes clear that cookies can only be stored if consent complying with the GDPR has been given. The United Internet Group tracks changes in the legislation and case law on an ongoing basis, so as to evaluate and if necessary modify existing processes. The objective is to allow users of the United Internet Group's websites and web shops to say for themselves how cookies are to be used. A multilevel consent procedure allows them to protect their privacy as optimally as possible by deciding for themselves the information that should be processed.

## Ensuring Data Privacy at United Internet

NfS: Policies Pursued

We aim to ensure compliance with data privacy requirements throughout the Group, and to embed this in our systems, processes, and products. Our local data privacy departments work to ensure a uniform approach is adopted throughout the Group and a high level of data privacy. The operating business is supported by a system of data privacy coordinators and managers, and local data privacy organizations. The data privacy officers in the Group segments and the Group Data Privacy Officer report to the segment management boards and to United Internet AG's CFO respectively.

We have anchored the target of ensuring compliance with data privacy requirements in the Group in the following ways:



Privacy by design: Use of special technological design measures and/or default privacy settings to ensure compliance with data protection requirements (see also Article 25 of the GDPR).

### ■ Integration of data privacy expertise with the product development process

The data privacy departments and data privacy coordinators serve as internal consultants for data privacy questions that arise for example during product design or development ("privacy by design" or "privacy by default") or in the context of contractual agreements.

### ■ Comprehensive, easy. to. understand rules

We assist compliance with data privacy requirements and best practices using internal guidelines and processes that make these more understandable and more transparent. Our "Information Security and Data Privacy" brochure explains to staff in a clear, comprehensible manner how to deal responsibly with personal data and information. This includes telling them the basic data privacy rules that they must observe, how to use e-mail and the internet securely, and what to do in the case of external visitors to the Company's locations.

### ■ Regular data privacy training to help prevent problems

We want each and every employee to help ensure that personal data is processed lawfully and to ensure in particular that sensitive information does not fall into the wrong hands. We do this by regularly training staff on basic data privacy requirements using face-to-face and/or e-learning formats. Since the end of 2021, the United Internet Group has had a fully redesigned data privacy e-learning course, replacing the e-learning course used in previous years. Advanced training events on data privacy and data security are also held at regular intervals.

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In addition to entry-level and advanced training for employees and/or managers, a regular drill-down event is held that teaches managers their roles and the principles behind their responsibilities as regards data privacy and compliance with it.

■ **Contact with the supervisory authorities**

United Internet's Data Privacy department is in regular contact with the competent data protection supervisory authorities, particularly in relation to processing customer submissions that the authorities pass on to the Company. We also forward notifications of breaches of GDPR requirements – of which there were 50 in 2021 (2020: 39; 2019: 86)<sup>(1)</sup> – to the competent data protection supervisory authorities.

NfS: Nonfinancial Key  
Performance Indicators

GRI 418-1

■ **Complaints procedures ensure effective detection**

Customer questions and complaints about data privacy are handled by trained staff in special data privacy teams in the Complaints Management department, who work in close cooperation with the specialist data privacy departments for the Group companies concerned. We respond to conspicuous events by, for example, adapting our guidelines and raising awareness among the employees involved. In addition, our employees can contact the data privacy departments at any time in confidence to discuss data privacy issues arising in the course of their day-to-day work.

■ **Effectiveness checks**

The United Internet Group's data privacy departments are in a position and authorized to perform internal data privacy checks at any time. In addition, independent audit organizations are commissioned to perform external, objective data privacy audits in order to identify internal potential for improvement. Moreover, the data privacy departments are involved in the measures taken to check service providers and subcontractors.

■ **Greater data privacy through technical safeguards**

Customers trust us with their personal data, and the security standards that we have implemented are constantly enhanced and improved in order to protect it. For example, the 1&1 Service PIN was introduced in the Consumer Access segment in December 2019. This is a personal five-digit code that customers can access and modify independently in their 1&1 Control Center. If customers make contact by phone, customer service staff compare three digits of the PIN as part of the authentication procedure. The 1&1 Service PIN replaced the three-factor authentication method previously used as the main means of authentication. Security measures such as a support PIN and two-factor authentication are also being implemented in the Consumer Applications and Business Applications segments, or are available to customers as an individual configuration option if needed.

(1) Including Consumer Access, Consumer Applications, and Business Applications, excluding independently managed companies.

## Information Security

### Expanding Internet Security

Customer trust in the measures we take to ensure information security is the basis for ensuring that they feel able to trust us both with personal digital information such as photos, documents, and e-mails, and with business data (e.g., when running applications in the cloud).

The information that we have to protect comprises both customer and employee data. It is handled in our internal systems in business processes that are in turn part of products. We aim to protect information against unauthorized access and misuse throughout the entire, complex product environment. In the process, we ensure we comply with the protective goals of preserving confidentiality, availability, and integrity. Our security strategy aims to use specific security management measures to achieve and continuously enhance our protective goals throughout the Group at an appropriate and uniform level.

We base our activities here on recognized international standards. For example, we have implemented an information security management system (ISMS) in accordance with ISO 27001. Establishing and expanding our effective, scalable security organization is particularly important here.

#### Management Using Our Information Security Management System (ISMS)

Apart from protecting customer data, the main objective of information security is to maintain United Internet's ability to do business and to reduce negative impacts on its business operations.

The overarching ISMS is managed by the Information Security department, in keeping with the participating companies' business strategies. This department comprises two teams: Service and Security Management, and Technical Security. Among other things, the Service and Security Management team is responsible for managing information security guidelines, developing security instructions, training staff, communicating with government authorities about security issues, and performing information security risk management. The Technical Security team provides advice in relation to security architectures, and applications, systems, and network security. This unit trains employees how to ensure secure development and operations, performs security tests, and handles any security incidents together with the departments concerned.

The Head of Information Security – who is also one of the Group's telecommunications security officers under the German Telecommunications Act (Telekommunikationsgesetz – TKG) reports regularly to the Chief Technology Officers in the relevant segments. Reporting covers the information security risk portfolio, any relevant security incidents that have occurred, the specific measures taken, the results of security audits, and key security trends. Security architects and experts from the Information Security department support the Head of Information Security in designing and implementing wide-ranging and overarching security enhancements.

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**Information Protection Measures**

Vulnerabilities can have far-reaching consequences, both for United Internet’s reputation and for customers. United Internet has taken the following technical and organizational security measures, among others, to prevent such risks.

NfS: Policies Pursued

GRI 417  
GRI 417-1

**Technical Measures**

■ **Secure software development**

The best approach is to prevent security vulnerabilities arising in the first place. All segments use various maturity levels of the Secure Software Development Life Cycle (SSDLC), which consistently includes security in the software development process at a methodological level right from the start. Generally speaking, a number of different measures are an integral part of product development – from threat analyses and dual-control source code reviews through automated checks and wikis of development/security best practices, down to application penetration tests. As the use of agile development methods and new technical platforms spreads, the SSDLC is being continuously expanded to include secure dependency management up to and including secure containerization.



Wiki: A website whose content can not only be read by visitors but also edited and modified directly by them in their web browsers.

■ **Global distributed DDoS shield**

Distributed denial of service attacks (DDoS) are concerted internet attacks originating from multiple sources that are designed to reduce the availability of our services. We use an internally developed global DDoS shield, which is optimized continually, to protect ourselves against these attacks. One component of this system cleans the incoming data stream on an event-driven basis in the event of a DDoS, only letting through legitimate customer queries. A second component acts as a web shield at application level, protecting internet services from attack. In order to do justice to the constantly increasing responsibilities in this area, the Network department established a dedicated Defense Platform Services team of security experts in 2021, with the aim of continuously improving the DDoS mitigation platforms and maintaining a constant high security level.

■ **Systematic use of encryption – Transport Layer Security (TLS)**

We use TLS (“Transport Layer Security”), which is also known under its former name of SSL (“Secure Socket Layer”), for encrypted transmission of customer data. In addition, we make TLS functionality available to customers to protect their data traffic, e.g., for entering passwords or payment information such as in online shops.

■ **Georedundancy**

We operate data centers in multiple, geographically discrete locations in Europe and the USA. This allows us to store information at a variety of different locations and minimize the risk of business interruptions and data losses caused by external factors. In addition, planning of the “Regions and Availability Zones” policy within the IONOS Cloud Platform progressed in the 2021 reporting period, and will successively be transferred to production starting in 2022. This is designed to enable customers to specifically influence the location and redundancy of the applications they run on our platform.

- **Data centers certified in accordance with ISO/IEC 27001**

We commission annual ISO 27001 audits of the secure operation of our data centers and certain aspects of our systems operations and software development activities so as to ensure we can offer our customers the highest possible security standards. In 2021, IONOS started working towards a supplementary IT-Grundschutz certificate for security verifications specifically for the German customer segment. The first step was the successful completion of an IT-Grundschutz test. Other complementary standards and certifications are also being planned.

## **Organizational Measures**

- **Staff training**

In addition to the technology, humans are an important part of all aspects of the security chain. Basic training and refresher courses (both face-to-face and e-learning offerings) are used to provide employees with information. In 2019, our previously voluntary e-learning course was turned into a mandatory measure that must be repeated every two years. In the 2021 reporting period, a mandatory Company-wide refresher course was launched for the first time. A total of 68% of employees had already completed the renewed training at the end of the year. What is more, classroom training courses were used to raise awareness of information security among 328 employees. Virtual classroom courses, which have been deployed to a greater extent since the start of the COVID-19 pandemic, extend the reach of the training to more remote locations. In addition, managers are given specific training on data privacy and compliance issues.

In October 2021, an Information Security Awareness Month was held at our location in Cebu, the Philippines in addition to the conventional e-learning courses. Brown bag lunches and "Lunch & Learn" sessions, flanked by activities and guest presentations for employees, were held in order to reinforce the importance of information security.

In addition, 1&1 ran a campaign in the fourth quarter of 2021 to raise staff awareness of phishing via e-mails. This campaign was successfully completed, with more than 100 employees attending, and will be extended to other areas of the Company in 2022.

- **Information security rules**

Our comprehensive rulebook, which is based on ISO 27001, is designed to provide employees in all departments with guidance. Our mandatory information security guidelines serve as the formal basis for this. We use a variety of different communications channels to present these rules to different groups and make them easily accessible for employees. In addition to the abovementioned training courses, our intranet provides tips and tricks and explanations of the rules for key employee roles. These also include our internal "Information Security and Data Privacy" brochure, which gives clear explanations of the most important rules governing how to handle information and data. Bound copies of this brochure are handed out at our regular onboarding events. The brochure and our intranet also list the contact points to which employees must report potential or suspected security incidents – i.e., violations of the rules or other threats to the Company – without undue delay.

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### ■ Security audits

The Information Security unit conducts product, process, and system audits in order to ensure the effectiveness of the ISMS. These are supplemented by audits and checks within the departments and by external audits. End-user departments also plan audits and perform these independently. These audits, which are often commissioned externally, are supported by the distributed security organization. One increasingly common tool here are maturity models. In particular, the technical departments that are responsible for customer data use a security maturity model developed by Information Security. The departments' development activities benefit from clear position finding, while the model also provides a tool for independent, focused, comparable improvements. Maturity models offer an efficient way of planning effort-intensive, in-depth audits more effectively. They allow audits to be planned in for those places where they support maturation most effectively.

### ■ Continuous monitoring

We also continuously monitor various IT systems in order to discover any data vulnerabilities as quickly as possible. In addition to local monitoring, our Security Incident and Event Management System (SIEM), which has been customized and enhanced internally to fit our environment, allows us to capture any incidents and can trigger appropriate responses. To ensure continuous improvement, we measure the time taken to distinguish between security incidents (e.g., attacks) and non-security incidents (e.g., interrupted power circuits). We also capture our response times from the point at which we receive notification of a problem to its resolution. In addition, we have defined internal targets for certain security-related goals, such as availability.

### ■ Security incident handling

All business segments have defined standardized processes for handling security incidents. Once an incident is detected, a trained incident manager is responsible for pushing forward with its resolution. Where necessary, he or she also consults the Security Team or external experts.

## Integrating Business Acquisitions

We perform a thorough review of existing technical and organizational information security measures before entering into business combinations with other companies, and at key points in the integration process that follows. A maturity analysis based on international standards is used for this. Information Security then supplements the level of maturity established by conducting a risk assessment and recommending actions. A range of integration measures are then resolved and implemented, depending on the results and our business strategy. Acquired companies are included in United Internet's Information Security Management System (ISMS) where it makes sense to do this. The goal is to establish an appropriate, Group-wide security standard. In 2021, planning started on introducing a joint target ISMS covering those IONOS subsidiaries that do not form part of the Group ISMS.

## Product Security

United Internet offers users solutions for secure, data privacy-compliant internet-based communication and cloud services. With its "E-Mail made in Germany" and "Cloud made in Germany" initiatives, the Group has built a sound reputation for secure sending and receipt of private e-mails, and for protecting digital privacy in the cloud.

### E-Mail Made in Germany



<https://www.e-mail-made-in-germany.de/>



The "E-Mail made in Germany" initiative was launched by United Internet and Deutsche Telekom in 2013. The initiative's member companies offer customers high standards of security and data privacy. These include encrypted transmission of all e-mails across all routes operated by members, the processing and storage of all data in Germany in accordance with German data privacy requirements, and the identification of secure e-mail addresses within the e-mail applications. Since April 2014, "E-Mail made in Germany" has only used SSL keys certified in Germany and all transmission routes have been fully encrypted. It goes without saying that all partners' processes comply with the GDPR. In 2015, GMX and WEB.DE – e-mail services belonging to United Internet – significantly enhanced the "E-Mail made in Germany" security standard by developing an encryption solution based on the globally recognized Pretty Good Privacy (PGP) standard.

### Cloud Made in Germany



<https://www.gmx.net/cloud-made-in-germany/>



In fiscal year 2017, GMX and WEB.DE introduced free end-to-end encryption of cloud content for all users. Customers can use this "safe" to encrypt their data locally before uploading, hence protecting it from third-party access. Sensitive content that has left the customer's device is stored online only as an unreadable data set. The data is only decrypted again once it has been downloaded from the cloud to one of the user's devices. This move by the GMX and WEB.DE portal brands strengthens their "Cloud made in Germany" initiative, which was launched in 2016, and hence increases internet security.

### De-Mail Standard



<https://www.e-mail-made-in-germany.de/De-Mail.html>



Since 2012, the De-Mail standard has offered legally valid e-mail communication that can be used for online registration and notification processes involving public authorities, and for legally binding digital transactions. GMX, WEB.DE, and 1&1 have been accredited De-Mail service providers since 2013. In 2016, GMX, WEB.DE, and 1&1 were certified for the first time as complying with the European Union's eIDAS ("Electronic Identification and Trust Services") Regulation. Based on this certified infrastructure, they will also be able to offer their users a legally valid method of communication with all other EU Member States in future. The eIDAS Regulation creates an EU-wide standard for the unique identification of all participants and the digital signature of cross-border electronic data transmissions. This creates uniform conditions in all EU Member States for the trusted, verifiable exchange of documents and legally valid communications between citizens, public authorities, and enterprises.

We had applied in the past for approval as an identity provider as defined by the German Online Access Act (Onlinezugangsgesetz – OZG) for our single sign-on system, which is based on our De-Mail infrastructure. The approval audits have now been completed and since 2020 our single sign-on system can be integrated with the service portals operated by the Länder and the federal government. We are



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in concrete discussions with the federal government regarding this integration and are successively making contact with the Länder via the CIOs concerned. In future, all De-Mail users and GMX, WEB.DE, and 1&1 customers should be able to use their De-Mail accounts to directly access services offered by the federal government's and Länder citizen accounts and service portals forming part of the network, without having to log on and authenticate themselves again. This makes it much easier for citizens to use all participating e-government processes, and offers our customers and users additional uses for their De-Mail accounts.

## Data Privacy and Encryption of E-mails, etc.

In addition to the abovementioned security features such as TLS, end-to-end encryption using PGP, and the "safe" function for cloud storage, all user data and content are stored in data centers whose servers are located in Germany. This means that the capture and processing of all data are subject to Germany's strict data privacy laws and to the provisions of the EU's General Data Protection Regulation. User consent is paramount at all times.

The two-factor authentication process introduced in June 2019 provides additional protection for user accounts. With this procedure, accounts can be protected by an additional security code that has to be entered during the log-in process, as well as a password. This second factor makes it harder for attackers to access accounts, even if they have guessed the passwords or obtained them using malware.

## Secure E-commerce

Customer trust is a critical factor in e-commerce. In addition to concerns about the security of their personal data, consumers have questions regarding the reliability of online transactions, on providers' delivery capability, and on online services. This is why we take the measures necessary to allay any consumer concerns and to build up their trust.

IT security is becoming an ever-greater audit focus from year to year. Therefore, among other things, well-known technical services provider TÜV Saarland regularly audits the online shops run by Drillisch Online's core brands (maXXim, smartmobil.de, simplytel, PremiumSIM, winSIM, yourfone, Galaxy EXPERTE, handyvertrag.de, and free-prepaid). The annual certification and review process caters to our customers' wishes, since security and quality are just as important to them as the price of our products and services. For us as an online retailer, certification with the well-known TÜV seal of approval offers an opportunity to reduce aborted transactions, positively impacting online sales. The requirements that have to be met to obtain the seal cover issues relating to data security and systems security, data privacy, and online content and processes, among other things. The comprehensive, multistage process needed to gain the TÜV seal of approval includes an on-site audit. This examines not only the reliability of order processing but also reviews the way in which customer service deals with customer queries and verifies the security of customers' personal data and payments processing.

After successfully completing the certification process, we are entitled to use the "TÜV-tested Online Portal" seal of approval in Drillisch Online's online shops. This demonstrates our commitment to offering customers a secure, satisfying online shopping experience and to undergoing thorough, systematic audits to assess whether we comply with this commitment. In addition, this certification helps us implement the GDPR's technical and organizational security requirements.

## Development of “Intelligent” Products



Artificial intelligence (AI): A subfield of information technology dealing with the reproduction using computers of certain aspects of human thought and activity. Machines learn how to solve problems by observing their environment. The objective is to build on this knowledge to solve similar new problems independently.

Security and user-friendliness are also core issues for us when enhancing our products and services. We are also making increasing use of data science, artificial intelligence (AI), and machine learning here.

### Intelligent Mailbox Function



GMX and WEB.DE’s intelligent mailbox provides customers with a handy way of categorizing and grouping e-mails, allowing these to be dealt with more quickly and simply in a clear overview. Key e-mails can be found more rapidly and additional useful administration functions are provided for handling mass mailings. This saves time and makes the process more user-friendly. For example, the parcel tracking function allows the standard information about a shipment’s status to be displayed above users’ e-mails, and to group all orders together in an overview. In addition, users can customize offerings to suit their own specific interests, and decide themselves which extra functions should be enabled in their mailboxes. There were 5.69 million active intelligent mailbox function users as of the end of the 2021 reporting period (2020: 3.51 million; 2019: 0.25 million).

The intelligent mailbox function is self-learning, and by training the systems we will soon be able to offer the technology to create and offer additional e-mail categories. This will provide users with even more clearly structured mailboxes. The 2021 reporting period saw the introduction of the “Contracts & Subscriptions” category, which provides useful functionality that helps users to manage their contracts and subscriptions. Among other things, it offers an overview of their contract documents, enables comparisons to be made between tariffs, and provides a termination template and termination reminder alert for use if desired. For further details, please see the section entitled “Improved Spam Recognition Enhances E-mails’ Relevance and Security.” It goes without saying that the familiar data privacy requirements set out in the GDPR also apply to “intelligently captured” data at GMX and WEB.DE.

### Improved Spam Recognition Enhances E-mails’ Relevance and Security



Phishing: The attempt to obtain passwords using fraudulent e-mails or websites.

We work continuously to improve our recognition and filtering of spam – unsolicited or even harmful messages – so that these do not reach our users in the first place. In the 2021 reporting period, we were able to increase the proportion of spam mails that were recognized and filtered out by our proprietary spam scanner from 2% to 20% – a rise of 18 percentage points – thanks to the use of new methods and data science. Spam complaints from users during the same period declined by 10.5%. This shows us that the “right e-mails” are being identified as spam.

Spam can be anything from dangerous or harmful e-mails aimed at distributing viruses or at phishing down to unsolicited mails such as frequent mass mailings for advertising purposes.



Machine learning: A subfield of AI that generates knowledge by identifying patterns in existing data. This is achieved using algorithms and is known as “learning.” The knowledge, which generally takes the form of rules, can be used to optimize and automate products and processes.

We achieved this improvement by deploying new virus scanners and optimizing configurations. In addition, we started developing a proprietary spam scanner in 2020 that is customized for our services and that uses machine learning techniques, among other things. An initial prototype went live in 2020, with Version 1 following in the 2021 reporting period.

What is more, the standard allowing users to unsubscribe from newsletters, which was developed in 2019, helps them clean out their mailboxes and only receive the e-mails they actually want to receive. This is based on Internet Engineering Task Force standard RFC 8058 (One-Click Unsubscribe), which allows recipients to cancel newsletters directly in their e-mail mailboxes with a single click. The “unsubscribe” link is always positioned directly next to the e-mail sender. This means that users no longer have to search for it or visit the sender’s homepage. The Certified Senders Alliance (CSA), an

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initiative launched by industry association eco – Verband der Internetwirtschaft e. V., has added this standard to its rulebook, meaning that it is widely observed by leading senders. The service has been well received by our customers.

All in all, we were able to significantly increase both the relevance of incoming mails and the security of e-mail usage for our customers’ benefit.

**User Feedback and AI Further Enhance Spam Recognition**

Incoming e-mails at GMX and WEB.DE are checked for whether they comply with spam criteria as a matter of course. If an e-mail is identified as spam, it is moved to a separate folder. However, new and constantly changing spam attack methods may lead to unwanted e-mails landing in customers’ inboxes. Conversely, desirable e-mails may end up in the spam folder. Many users already address this issue by manually moving e-mails to the correct folders, training their personal spam filters in the process.

GMX and WEB.DE are now also using this individual user feedback for their general spam filters and for training their AI systems. This will allow us to protect users faster and more effectively against new types of spam. It goes without saying that users must have agreed to this. They can do this in their e-mail settings by activating the “Spam recognition using moved e-mails” option. In this case, GMX and WEB.DE can analyze and categorize content such as the subject lines or URLs of the e-mails that have been moved, plus associated traffic data such as the senders or IP addresses. The analyses are largely performed automatically by computer systems, and only in isolated cases by hand. The data is used strictly for its intended purpose and is processed in accordance with the provisions of European data privacy law. Users can revoke their consent at any time by changing their spam recognition settings. A total of 573,401 customers gave their approval for enhanced e-mail spam recognition in the 2021 reporting period (2020: 376,207; 2019: 159,437). The figure for unsolicited e-mails was 687,466 (2020: 454,400; 2019: 190,869).

In addition, we are using machine learning to improve our identification of e-mail accounts that are controlled by botnets, so as to prevent spam mails from being distributed in this way.



Botnets: Networks running automated malware.

## Using Machine Learning to Identify Fraud

In our hosting business, we have developed a machine learning-based method of using domain names to predict whether the domain itself could be used fraudulently or misused.

Many security attacks today, such as spam mails and phishing, use domain names that make a serious impression on recipients. For example, e-mails may be sent from addresses or contain links to websites whose names are highly similar to well-known, trustworthy domains. Users often do not recognize such tricks immediately. This type of fraud focuses on (or attacks) recipients, but can also impact our hosting customers, whose domains could be blocked by other providers as a result of such fraudulent activity. Our own organization can also be negatively impacted by this if the customer does not pay the costs incurred for registering the domain.



Algorithm: Unambiguous, step-by-step instructions on how to solve a problem or a task. Their unambiguous approach means that algorithms are often used in computer science to solve problems automatically, with a specific input being translated into a defined output.

The data product that we have developed learns from previous domain registrations that have been identified and flagged by our fraud experts, and can assess pending domain registrations within milliseconds. One result is that customers may be offered a restricted range of payment options that require additional authentication, among other things, in order to minimize the risk for our Company. This function was added to our processes in 2019 and has already led to a reduction in the fraud rate.

In addition, French and Spanish were added to the system in the 2021 reporting period alongside the existing languages, German and English. This permits analyses to be made in other markets as well. The next step we are planning is to drive forward the system's use at the other Group companies that are active in the hosting area. Machine learning is an excellent way of identifying attempted fraud – the methods for which are constantly changing – and we are therefore confident that we will be able to develop and provide additional useful services going forward.

## Data Control and Sovereignty

### The European Log-in Standard: netID



<https://enid.foundation>



Within the Group, United Internet uses a number of measures to ensure internet users retain data sovereignty, such as the netID log-in standard that provides them with greater control over their data and enhances user-friendliness. Users have to register for, and provide profile names and passwords to access, almost all internet offerings – from online shops through social media down to app stores. Trying to manage this flood of IDs and passwords is a major challenge for customers. Single sign-on services offer a solution that not only enables users to retain control over their data but is also more user-friendly: Users can register with a large number of online services using a single, secure combination of their user name or e-mail address and password. In March 2018, United Internet, the RTL Deutschland media group, and ProSiebenSat.1 founded the European netID Foundation (EnID) in order to provide a European alternative to US offerings in this area.

This independent foundation developed the netID open standard – a central log-in that is “made in Europe” and with which customers can currently log in to more than 120 partner offerings. The United Internet Group's GMX and WEB.DE e-mail platforms are among the netID account providers. Users with existing GMX or WEB.DE accounts can use netID to log on to participating partner offerings by entering a combination of their e-mail-address and password. Equally, new users can set up a free netID account with a mix of their e-mail address and a password.

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netID stores user consents in a stable, device-independent form, meaning that users are shown consent forms less frequently. Instead of third-party cookies, which are increasingly being blocked, netID uses a stable identifier to identify users that can be accessed by netID partners. This also makes netID interesting for marketers, since they can use netID to power data-driven business models in a way that is both future-proof and legally secure.

netID is subject to the strict European data privacy requirements set out in the GDPR. The foundation reviews all standards, partners, and account providers that are members of the initiative. It also sets high store by transparency and focuses on user data sovereignty. For example, users can independently consent to the use of their data, or revoke such consent, at any time using a “privacy center.” This improves data control in the internet.<sup>(1)</sup>

## GAIA-X – the European Cloud Project

The idea behind GAIA-X is to build a data ecosystem using European security and data privacy standards that meets the highest digital sovereignty standards. IONOS has been involved in GAIA-X AISBL<sup>(2)</sup> right from the start, is a member of its Technical Committee, and is actively helping to shape this European initiative. The idea is for the numerous successful local clouds in Europe to cooperate and standardize their operations to create a common “hypercloud” that will allow both large enterprises and SMEs on the European and German markets to exchange and process data in a trusted, secure, and transparent manner. Customers can choose between multiple hosting providers and – thanks to the planned standards – can switch at any time.

IONOS is helping with the rapid construction of a European cloud by contributing its many years of experience in developing and operating cloud infrastructures to the GAIA-X project. Our employees are providing their knowledge in working groups on a number of issues, e.g., defining standards and the reference architecture, and establishing certifications. The objective is for GAIA-X to offer a European alternative to the large US and Asian cloud providers known as hyperscalers. Numerous European and German cloud providers, associations, and enterprises are also working on the project in addition to IONOS. In the summer of 2021, the then Federal Ministry for Economic Affairs and Energy held a sponsorship competition and initially selected 16 beacon projects to demonstrate the concrete uses of Gaia-X. IONOS is involved in six of these projects and is the consortium manager for the MARISPACE-X project, which is developing a maritime data space.

NfS: Customer-related  
Matters/Data Control and  
Data Sovereignty

GRI 102-12



See the [Federal Ministry for Economic Affairs and Climate Protection](#).

(1) The opinion published by the German Data Ethics Commission (DEK) in October 2019 also recommended promoting the use of standards – such as netID – to enable individuals to continuously track and manage the persons and entities to which data access has been granted and to which data has been transferred, so as to be able to assert their rights effectively.

(2) “Association internationale sans but lucrative,” a non-profit association under Belgian law.

## Participating In and Shaping Digitalization

NfS: Customer-related Matters and Respect for Human Rights

As a leading European internet specialist, United Internet sees its role as building bridges to a digital future. Our goal is to offer consumers and companies greater and greater bandwidth for internet access and powerful cloud applications. In this way, we can provide full access to the numerous opportunities offered by the internet as a universal infrastructure for information, communication, entertainment, and e-business.

United Internet wants to contribute actively to ensuring that nobody – regardless of their age, education, or origin – is left behind on the road to digitalization, and to give them the space and opportunity to roam the internet safely and confidently.

The Company has a particular responsibility here, especially in view of 1&1 AG's new role as Germany's fourth mobile network operator. As a new entrant to the field, 1&1 has opted for state-of-the-art technology and is building the first fully virtualized mobile network in Europe to be based on the new OpenRAN technology. This innovative cloud-native network architecture enables real-time speeds and ensures independence from dominant network equipment manufacturers. 1&1 has selected OpenRAN pioneer Rakuten as its partner for its active network infrastructure. A new entrant on the Japanese market, this company successfully rolled out the world's first virtual mobile network. 1&1 has ambitious goals to expand its network: It intends to provide coverage for 1,000 base stations by the end of 2022, while 25% of German households should have rapid mobile access by the end of 2025 and 50% of households by the end of 2030. This corresponds to the requirements set out by the Bundesnetzagentur (the Federal Network Agency), which 1&1 signed up to on successfully participating in the 5G frequency auction in the summer of 2019. 1&1 wants not only to comply with these goals, but in fact to exceed them.

NfS: Risk Prevention

Designing mobile communications to be secure and reliable is an absolute precondition, and this also applies to the new network architecture in 1&1's O-RAN. We performed extensive risk assessments together with our partners and are implementing a security management system that is certified in accordance with ISO 27001. We comply with all key elements of the recommendations regarding the security of OpenRAN mobile networks issued by the BSI (Germany's Federal Office for Information Security), and are in close contact with the authority on this. In addition, 1&1 is a member of the international O-RAN Alliance, whose expert bodies analyze the security of OpenRAN technology in depth, and continuously enhance it.



See "Customer-related Matters and Product Responsibility" on page 27ff.

Following the successful 5G auction, 1&1 and the established network operators – Telefónica Deutschland, Vodafone and Deutsche Telekom – signed an agreement with the Federal Ministry of Transport and Digital Infrastructure (BMVI) and the Federal Ministry of Finance (BMF) to build mobile phone base stations in "white spaces." By doing so, the company will help close gaps in coverage in rural areas in particular: Constructing large number of masts will contribute to improving mobile phone reception in these regions. In return, 1&1 can transfer the license fees payable for the frequencies to the federal government in installments until 2030. This step illustrates the benefits of cooperation for both consumers and network operators.

What is more, the Consumer Access Segment enables a wide range of customers to participate in the process of digitalization thanks to 1&1 AG's broad portfolio, which covers everything from premium to discount rate plans.

Additionally, the Consumer Applications Segment with the GMX and WEB.DE portals' freemail variants offer free e-mail and cloud services, plus associated product innovations such as our intelligent mailbox function, the netID log-in standard, or the advance letter mail notification introduced in 2020 in cooperation with Deutsche Post AG. Registered users can use this free e-mail service to be alerted to

**CORPORATE DIGITAL  
RESPONSIBILITY**

Management Approach	Data Control and Sovereignty
Data Privacy	<b>Participation in Digitalization</b>
Information Security	Digital Literacy
Product Security	

incoming letter mail. Since March 2021, a digital copy service has also been available on request free of charge in addition to the advance letter mail notification. With it, users not only receive a photo of the envelope up front by e-mail but also the contents of the letter are provided in advance as a PDF attachment to the notification e-mail. This applies in particular to deliveries that were already sent to Deutsche Post AG in digital form by the sender. Express one-time consent on dispatch and receipt of the letter is a precondition for using the service.



“Our customers were extremely enthusiastic about the advance letter mail notification. This was the first step towards linking the physical and digital worlds with one another. Now the digital copy takes this idea to the next logical level, making the contents of letter mail available directly via WEB.DE and GMX. As a result, users can collate all relevant information from companies and public authorities in a single, central location for the first time. This means that letter mail can now also make use of the benefits offered by electronic communication: Recipients have a rapid overview, can search for and archive documents easily, and the smartphone e-mail app means that they always have their personal mailboxes with them.”

**Jan Oetjen**, CEO 1&1 Mail & Media Applications SE.

All these measures are ways of implementing digital participation. Today, the availability of affordable internet access options is seen as vital for achieving economic and social development, and even for exercising human rights.<sup>(1)</sup>

## Freely Accessible News Sources

The Company’s GMX, WEB.DE, and 1&1 portals offer users not only e-mail and cloud services but also unrestricted access to content from their own, independent editorial team. 10% of German internet users use GMX and 11% use WEB.DE as a source of news on a weekly basis, while 7% (GMX) and 6% (WEB.DE) use the two freemail portals to obtain information at least three times a week. This is documented in the Reuters Institute’s Digital News Report 2021. In addition, the German-language MedienVielfaltsMonitor for the first half of 2021 puts GMX and WEB.DE among the top 10 media in the German opinion market. GMX and WEB.DE came second and first respectively in the “online opinion market” category. The two portals therefore contribute significantly to social discourse.

In order to do justice to the responsibility that this entails, we have established clear guidelines for ourselves that are set out in an editorial mission statement. Among other things, we want to offer content that is relevant for users, as well as always complying with strict data privacy standards and aiming to provide rapid and above all correct reporting in acute news situations. If errors occur nevertheless, we correct them transparently in line with a clear set of rules by drawing readers’ attention to the corrections beneath the article. The list of rules was made available to all users as part of an extensive self-assessment, the Journalism Trust Initiative.



See the 2021 [Digital News Report](#) and the (German only) [MedienVielfaltsMonitor](#).



[Journalism Trust Initiative](#)

(1) See e.g., the [Bitkom article](#) (German only) dated November 24, 2019.

### Journalism Trust Initiative (JTI) Standard Enhances Transparency

In 2021, the editorial team decided to conduct a self-assessment in line with the Journalism Trust Initiative standard in order to make their quality standards transparent to readers. This initiative, which was launched by the Reporters Without Borders organization, aims to disclose editorial rules, ownership structures, and sources of finance and hence enhance transparency for readers, allowing them to assess different sources of news more easily.

As part of this self-assessment, the editorial team revised its entire rulebook and published large sections of it. In addition to rules for dealing with sources and identifying news items and opinion pieces, the section entitled "How the Editorial Department Works" also contains information on the duty of care due to employees and the content of education and further training.

The JTI Standard is also the basis for calculating the Global Disinformation Index, a study determining the probability of disinformation occurring for different media. After the editorial rules had been revised and published, WEB.DE and GMX were classified as belonging to the group of media with the lowest disinformation risk, with risk scores of 76 (WEB.DE) and 77 (GMX).

In addition, the editorial team uses a wide range of mechanisms to ensure transparency for users about our sources. We regularly invite readers to visit our editorial offices, allowing us to stay close to our users and to learn from them personally what they expect from us.



See the [German Press Council website](#).

We have abided voluntarily by the rules set out by the German Press Council for many years, and went a step further in 2019 by officially undertaking to comply with the German Press Code. Apart from the classic media brands, our portals were the first major pure-play online media in Germany to take this step.

The editorial news offering is not limited to the German market, but is also to be found on the brand's localized national portals in Austria and Switzerland (GMX.at and GMX.ch). Users of other country portals in the USA, the United Kingdom, France, and Spain are offered an automated news feed in the language of the country. Strict rules apply in all cases to partner adverts in order to protect customers from misleading advertising or offerings from the tobacco industry, for example.



**CORPORATE DIGITAL  
RESPONSIBILITY**

Management Approach	Data Control and Sovereignty
Data Privacy	<b>Participation in Digitalization</b>
Information Security	Digital Literacy
Product Security	

## Association Work and Cooperative Ventures

United Internet lives up to its responsibility to help develop the digital economy. For example, many employees contribute their time free of charge during working hours to a variety of European and national associations, joint industry committees (JICs), and foundations in order to help shape the future, ensure transparency, and create standards that benefit users.

For example, since network security does not stop at the walls of our own data centers, United Internet is active in a number of associations such as Bitkom, the Alliance for Cyber Security founded by the Federal Office for Information Security (BSI), and the M3AAWG. The Company's goals here are to promote both increasing digitalization and the development of new security standards. In addition, we share the results of our information security research within industry associations, or make them publicly available.

The Group also supports the Interactive Advertising Bureau (IAB) Europe and the German Association for the Digital Economy (BVDW), for example. Among other things, the members of these two digital associations are developing the framework for technology that will enable pages to load more rapidly and enhance the user experience. This also involves defining concepts and uniform processes so as to enable members to work more efficiently together. In addition, political and social frameworks are being developed – e.g., in relation to data privacy. In the area of Corporate Digital Responsibility, we played a key role in the development of the CDR Building Bloxx.

Equally, United Internet Group employees are contributing their working time, experience, and commitment to the German Dialog Marketing Association (DDV) so as to support the sector and shape the market to benefit users. One example of the work that the committees perform is to agree on e-mail marketing measures designed to make spamming even harder. In addition, as a founder member of the Certified Senders Alliance (CSA), we set out criteria and standards for good e-mail marketing. This allows us to roll out new standards such as One-Click Unsubscribe very quickly on the market.

We are a member of the EndUser Community of the Cloud Native Computing Foundation (CNCf), where we aim to represent end users' interests and hence offer a counterweight to those of the manufacturers.

Our employees also work in JICs such as agof, the German Association for Online Research. These JICs measure neutral performance criteria such as the reach of various internet offerings, providing the market with a "currency." In turn, this data makes it easier for website operators to obtain advertising finance, as a result of which more money is invested and users can be offered a better service.

Last but not least, United Internet employees support the work of the European netID Foundation by serving on the foundation board and advisory boards. This independent foundation is responsible for the netID log-in standard (see above) and is continuing to develop it together with the sector.

NfS: Dialog with Local  
Communities/at Regional  
Level

GRI 102-12  
GRI 102-13



See the [CDR Building  
Bloxx](#).



See [Cloud Native  
Computing Foundation](#)

## Basic Research

United Internet Media – a Group subsidiary and the exclusive media marketer for United Internet’s portal brands – regularly conducts research on basic topics that are of relevance to the sector. By doing so, it not only performs an educational function, but also provides the marketing sector with key data permanently and free of charge. Once a year, United Internet Media conducts the Digital Dialog Insights study together with the Stuttgart-based Hochschule der Medien (HdM); the current 10-year anniversary issue of the DDI published in 2021 addresses the issues of e-commerce, the post-cookie era, the coronavirus crisis, and digital dialog marketing trends. The experts polled in the course of the study expect the COVID-19 pandemic to have a long-term impact on consumer behavior and corporate marketing. According to them, high levels of investment in data-driven marketing and digital channels are to be expected in the next two years. At the same time, the survey of experts revealed that e-commerce is continuing to grow, driven by direct transactions, especially in the case of touchpoints with broad coverage, new product categories, and improved shopping experiences. Post-cookie era readiness is still at a low level: Only a fraction of companies have prepared adequately for the end of cookies. The pressure to find alternatives to cookies is rising: According to the experts, ID-based solutions such as netID will become significantly more relevant.

In a further study, United Internet Media researched the importance of e-mail for Generations Y and Z. The results revealed that young onliners use e-mail as a core application and daily tool. Having their own e-mail address for both private and formal communication is essential for the young generation according to a key finding of the “E-Mail Usage in the Young Generation” study, which was conducted in Germany, Austria, and Switzerland. In addition, the study documents the many touchpoints that e-mail mailboxes have in online shopping: Young generations also make heavy use of e-mail throughout the entire digital customer journey from product research down to communication after the purchase.

Marketers can use the results of this basic research by United Internet Media to respond better to current challenges, make more focused investments in technology, and improve their e-mail dialogs with customers. Users also benefit from this by receiving relevant information, content, and advertising messages.

1&1 Mail & Media also conducts a number of other basic studies on the use of digital services and applications for the WEB.DE and GMX portal brands. Core topics here are digital communication and internet security. Every year, WEB.DE and GMX commission a comprehensive digital communication study. Among other things, this provides data on the use of e-mail, social media, and messengers, plus market data on a variety of digital services.

In addition, WEB.DE and GMX used a user survey to examine the extent to which environmental and climate protection features in day-to-day internet usage. This revealed that a large majority of Germans take care to conserve energy and resources in their everyday digital lives. At the same time, the respondents know little about the carbon emissions that arise from internet usage and want to see greater transparency from device manufacturers and internet service providers, according to a core finding of the study.

**CORPORATE DIGITAL  
RESPONSIBILITY**

Management Approach	Data Control and Sovereignty
Data Privacy	Participation in Digitalization
Information Security	<b>Digital Literacy</b>
Product Security	

## Digital Literacy

### Digital Guide and Startup Guide Knowledge Databases

Our “Digital Guide – Ihr Ratgeber rund um Erfolg im Internet,” which we have been publishing since April 2016, provides freely accessible, internally developed content on websites, hosting, online marketing, e-mail, and IT. It has been supplemented since October 2018 by our “Startup Guide – Der Ratgeber für Gründer, Selbstständige und KMUs,” which offers useful information on how to found and manage a business. The two IONOS guides currently comprise roughly 21,600 articles in German, English, French, Italian, and Spanish that are aimed at a broad target group in Germany, Austria, the UK, the USA, Canada, France, Italy, Spain, and Mexico.

The two guides, which have attracted over ten million visitors, provide information to large numbers of readers every year: Both beginners in the field and advanced users will find help here. As one of the first touchpoints in the customer journey, we support consumers, self-employed professionals, and small and medium-sized enterprises by providing high-quality content about digitalization. Readers will find a wide range of information ranging from basic articles such as “what is a domain,” through tutorials and “how-tos,” down to explanations of and tips on data privacy and online law. Equally, new digital topics such as artificial intelligence, deepfakes, or the US CLOUD Act are explained in easily understandable terms. As of the end of the 2021 reporting period, a new tag on sustainability was added to the Digital Guide that pulls together all articles on this topic and will be available as of January 2022.

IONOS also offers numerous useful tutorials and webinars that are freely accessible on YouTube. Examples of topics covered include how to delete cookies or successfully optimize search engines. In addition, users of the German-language Digital Guide received a monthly newsletter on topical issues.

NfS: Customer-related  
Matters and Respect for  
Human Rights



[https://www.ionos.de/  
digitalguide/](https://www.ionos.de/digitalguide/)

[https://www.ionos.com/  
startupguide/](https://www.ionos.com/startupguide/)



Deepfakes: Images and  
videos that are  
manipulated so  
realistically using artificial  
intelligence that they can  
hardly be distinguished  
from originals.

# UNITED INTERNET AS AN EMPLOYER

## Management Approach

### Materiality, Impact, and Risks

NfS: Employee Matters and Impact of the Company's Business Activities

As an internet and telecommunications company, United Internet shares the typical features of this sector: a rapidly changing environment, short innovation cycles, and intense competition. Our dedicated and highly skilled employees and managers are a key factor in mastering these challenges.

GRI 103-1

This means we place great value on a sustainable, balanced strategy encompassing all core human resources areas: from employee recruitment through customized onboarding and training formats for specific target groups, job-specific qualification programs, and support for individual career paths, down to the development and long-term retention of managers, high potentials, and top performers.

United Internet aims to be a fair and attractive employer.

Our staff and applicants expect nothing less. Highly qualified, well-trained employees are the cornerstone of United Internet's business success. It is therefore vital for us to meet our short-, medium-, and long-term staffing requirements and ensure that our workforce has the necessary specialist skills. If we fail to do this, United Internet might not be able to do business effectively or to achieve its growth targets.

### Goals and Measures

NfS: Policies Pursued

In line with this, United Internet aims to be a fair and attractive employer. Our goal is to recruit managers and employees with specialist skills and technological know-how, to support their continuing development, and to retain them at the Company.

GRI 103-2



See "Our Values and Corporate Culture" on page 62ff.

One core principle of our human resources work is always to see our staff as individuals first, and not just as employees. We create a high-performance corporate culture by ensuring our corporate values are reflected in strategic human resources issues such as compensation, continuing education and training, and occupational safety.



See "Training and Education" on page 65ff.

We work constantly to enhance and expand employees' skills and managers' leadership qualities alike. We do this using focused professional development training, mentoring and coaching programs, and special offerings for high potentials, among other things.



See "Diversity and Equal Opportunities" on page 69ff.

We are also convinced that the diversity of our workforce is one of the preconditions for creativity and productivity. We make the most of this wealth of potential ideas and innovations by using a variety of formats to promote diversity and equal opportunities.



See "Occupational Health and Safety" on page 76f.

We also aim to use our employee health management program and our occupational safety and preventive measures to promote staff health.

Personnel issues are the responsibility of the heads of Human Resources at the business segments concerned, who report regularly to their management boards.

**UNITED INTERNET AS AN EMPLOYER**

<b>Management Approach</b>	Recruiting and Retaining Young Talent
Human Resources Strategy and Organization	Diversity and Equal Opportunities
Training and Education	Occupational Health and Safety



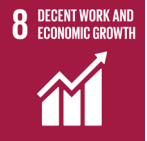
## Results and Assessment

We use a range of performance indicators to measure the effectiveness of our human resources work in different areas; these are generally calculated by HR Control and reported regularly to the Management Board. Indicators include employee satisfaction with professional development opportunities and measurement of our “return on education.” Further details can be found in the following sections.

NfS: Results of Policies Pursued

GRI 103-3

## Contribution to the SDGs

 <p><b>4 QUALITY EDUCATION</b></p>	Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.
 <p><b>5 GENDER EQUALITY</b></p>	Achieve gender equality and empower all women and girls.
 <p><b>8 DECENT WORK AND ECONOMIC GROWTH</b></p>	Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

## Our Human Resources Strategy and HR Organization

In addition to our general, overarching strategy, our Access and Applications divisions and the individual segments within them require specific human resources strategies. We have established centralized, topic-specific centers of competence to regulate overarching HR governance issues and offer Group-wide services, allowing requirements and staffing levels for the Group and the divisions to be coordinated. This ensures an overarching approach and equal treatment, while freeing up the segments to focus squarely on their operational business.

NfS: Policies Pursued

GRI 401

Responsibility for key elements of human resources development, recruitment, and HR marketing has been transferred to the segments concerned so as to guarantee this operational focus and ensure the HR strategy in the segments is as close to the business as possible. By contrast, the core “UI Learning and Organizational Development” center of competence promotes topics such as diversity and learning on a Group-wide basis so as to provide a framework for creativity and productivity. This helps leverage new ideas and innovative potential, enhances our Company’s competitiveness, and offers opportunities for all.


NfS: Nonfinancial Key  
Performance Indicators

GRI 401-1

Examples of overarching goals and targets are our aim of offering tailored staff development formats, recruiting managers from within the organization, and retaining employees for the long term. Metrics used to track effectiveness include the management positions that have been filled internally (2021: 65.71%; 2020: 73.65%; 2019: 70.19%)(<sup>1</sup>) and the staff turnover rate (2021: 11.21%; 2020: 6.70%; 2019: 8.96%)(<sup>2</sup>). In addition, we have set ourselves the goal of appointing more women to management positions.

GRI 102-7

GRI 102-8

 Multiyear overview, broken down by country, is given in the "Employees" section of the [Annual Report](#).

The following tables give a breakdown of the workforce by location (Germany or abroad) and segment:

<b>Employees by location<sup>(1)</sup></b>	2019	2020	2021
In Germany	7,761	7,929	8,199
Abroad	1,613	1,709	1,776
<b>Total employees</b>	<b>9,374</b>	<b>9,638</b>	<b>9,975</b>

(1) Figures refer to our active employees as of December 31 of each fiscal year.

<b>Employees by segment<sup>(1)</sup></b>	2019	2020	2021
Consumer Access	3,163	3,191	3,167
Business Access	1,184	1,188	1,238
Consumer Applications	1,007	1,005	1,004
Business Applications	3,416	3,631	3,998
Corporate HQ	604	623	568
<b>Total employees</b>	<b>9,374</b>	<b>9,638</b>	<b>9,975</b>


(1) Figures refer to our active employees as of December 31 of each fiscal year.

## Our Values and Corporate Culture

GRI 102-16



See "The Basis for Acting Responsibly" on page 11f.

 Onboarding: The induction process for new employees.

Our corporate values and leadership principles comprise our Company's value system. Our Code of Conduct shows how we act in line with these values. All employees receive a bound version of our Corporate Values and the Code of Conduct when they join United Internet, and these are also discussed during the onboarding process.

We prepare our managers for their responsibility as role models and have also anchored this as a core element of our leadership principles, so to ensure we are walking the talk with our values. These principles are currently being broken down in greater detail in the individual segments, for example in IONOS's Business Principles. In our two-monthly (virtual) manager onboarding meetings, small groups of managers discuss our values and leadership principles, and gain a firm understanding of what they mean for our day-to-day work. Management Board members from the individual segments kick off and introduce the topic, and actively reach out to our new managers on it. It is then discussed in more detail and put in an operational context in the obligatory three-part "Leadership Training – Leadership Foundations" course, which all new managers have been required to take since the first quarter of 2020.

(1) Active core employees, i.e., employees including apprentices and trainees, but not including staff with inactive employment contracts (mainly employees on parental leave), interns, student workers, school students, thesis students, and temporary staff.

(2) Annual average headcount (active core employees).

**UNITED INTERNET AS AN  
EMPLOYER**

Management Approach	Recruiting and Retaining Young Talent
<b>Human Resources Strategy and Organization</b>	Diversity and Equal Opportunities
Training and Education	Occupational Health and Safety

## A Learning and Feedback Culture

Learning should be an option for, and accessible to, all staff. In keeping with this principle, all training courses, networking events, and personal and professional development offerings were continued where sensible in a digital learning format in the 2021 reporting period, and delivered in a variety of unit lengths, from hour-long to full-day formats. As soon as the current pandemic situation permits, we will progress this as a judicious mix of virtual and face-to-face offerings and modular training courses of different lengths, so as to guarantee flexible learning in the future, too. This combination of different learning formats and times will also help to make hybrid collaboration a concrete reality.

Above and beyond this, we added a comprehensive knowledge platform on hybrid collaboration to our intranet in 2021. This allowed managers and staff to discuss concrete examples using numerous best-practice interchange formats to ensure we are all learning continuously from and with each other even in these extraordinary times. As a result, we have built strong digital working formats as an organization and taken cross-border collaboration to a new level. We intend to expand these activities in future. New formats such as working lunch sessions, brown bag lunches, and other short training modules are also helping us to build this continuous virtual sharing and learning process. Our new "Good to Know" information formats for managers and experts address current issues, while our "Starte durch" ("Flying start") training series helps new in-house staff find their feet quickly during virtual onboarding, too.

In addition, flat hierarchies and unbureaucratic communication channels permit rapid decision-making. This allows us to be agile and react flexibly to new challenges. Our open feedback culture is another essential foundation for working together and helps foster a high-performance and respectful environment. We can only actively practice values such as openness and fairness in an environment in which colleagues provide feedback to one another respectfully and constructively. Only such an environment allows continuous improvements that benefit individual employees, teams, and the Company alike. This is why high-quality feedback play a key role for us in establishing an open, supportive corporate culture.

Staff and managers assess each other directly in our annual feedback and performance reviews. In addition, employees can obtain digital, self-guided 360-degree feedback on themselves at any time, both from their direct superiors and from colleagues. This takes the form of a documented process and can be used in relation to project tasks, for example. This option raises awareness of the need for openness and reflection throughout the entire organization, and makes staff more confident about giving and requesting feedback. As a result, feedback becomes a natural part of everyday work and can be used for continuous improvement.

Other feedback methods are described on our intranet and can be deployed as needed in specific situations by both teams and individuals. We offer training for both employees and managers to assist teams in creating and maintaining a strong feedback culture, increasing the assurance with which they give and receive feedback. Moderators can also be provided for specific team workshops, allowing an individual feedback culture to be established in the teams concerned. In addition, obtaining feedback from colleagues is a fixed part of the process used when employees want to take on positions with greater responsibility.

## Internal Employee Communication

Ensuring we listen to our employees and providing them with appropriate communication channels are challenges for a rapidly growing company such as United Internet. At the same time, there is an increasing need to provide them with information about our strategy and how the Company is developing. This is why we have established a variety of successful channels for internal employee communication over the years. Additionally, the COVID-19 pandemic means that most events are being held in digital form, which has changed the nature of communication.

The Management Board members responsible for the individual segments use staff meetings and road shows to provide information on business developments in their areas several times a year. This permits employees to ask Board members personally about the Company's current performance, management issues, and other important topics. Since many employees also own shares in our Company, this ensures that they are kept informed in the same way as investors. These events were held virtually during the fiscal year.

## Fair Pay

NfS: Measures to Achieve  
Gender Equality / Equal  
Pay for Men and Women

GRI 102-41  
GRI 405-2

Paying our employees fairly and in line with performance is an important part of our human resources strategy. We aim to provide staff with market-driven, fair and transparent compensation and benefits that are aligned with our corporate strategy. Our internal compensation guidelines form the basis for our comparable, fair, and legally compliant compensation system. They clearly define the rules and procedures to be observed throughout the Group when making salary adjustments.

Some positions and levels of responsibility offer performance-based variable compensation components. In addition, the United Internet Group offers employees a number of benefits above and beyond the financial compensation it pays; these include a company pension, capital formation benefits, prevention programs forming part of our occupational health program, and discounts on our products.

The salaries we pay, and the way in which these progress over time, are independent of employees' gender or other factors that are not related to the position in question or the skills required. We compare positions internally every six months, keep up to date with market developments and analyses, and track external benchmarks in order to guarantee fair, appropriate compensation. To do this, the salaries for more than 7,000 staff in 8 countries are compared with benchmark data on normal market remuneration from a well-known survey provider. The results of the comparison are made available to the HR business partners and are incorporated in the salary formation process for both regular salary reviews and extraordinary salary adjustments.

## Employee Satisfaction

We have conducted employee surveys for over ten years now in order to obtain feedback and identify room for improvement, after which we take appropriate measures to implement our findings.

The most recent full employee survey was performed in October 2019 and confirmed the topics from the previous survey. Departmental meetings to communicate the results internally started in December 2019.

Due to the ongoing pandemic, the focus in fiscal year 2021 was on measures to protect the entire workforce and comply with all necessary safeguards, and to achieve a work-life balance. Nevertheless,



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work continued in parallel on individual overarching initiatives that had been identified in the last full employee survey, and in short and ad hoc surveys conducted at individual segments during the pandemic. The measures mainly relate to the following topics, whereby the different segments may focus on different aspects:

- Information and internal procedures relating to digital transformation in particular
- Fairness and appreciation
- Respectful dealings with one another

The responses from the full employee survey serve as an important indicator of whether our human resources work is a success.



To obtain as objective a view of ourselves as possible, we evaluate assessments by external institutions and independent sector rankings in addition to our internal surveys. In 2021, the Top Employers Institute again recognized us as a “Top Employer” – an accolade we have held for more than 10 years. This certification is awarded to companies that offer their employees attractive working conditions. Criteria used in the evaluation are career opportunities, employer benefits, working conditions, and training and development opportunities.

GRI 102-12



See United Internet’s profile at the [Top Employers Institute](#).

## Training and Education

### Development and Prospects

One of the basic principles for our People & Organizational Development work is “we make people successful.” In our dynamic, constantly changing market, our employees have to take responsibility both for their work and for their personal development. We are convinced that their motivation and determination to succeed depends on their ability to see and pursue individual prospects for themselves. Individual employees’ knowledge also grows our organizational knowledge as a whole. For example, keeping up with the state of the art in the areas of information security and software development protects our technology lead, while professional customer care enhances customer satisfaction.

NfS: Employee Matters/Training and Education

GRI 404  
GRI 404-2

We therefore invest in wide-ranging learning and development measures and ensure our employees grow in line with the functions they perform. Activities here are based on their individual “development journeys”. These are agreed during annual staff performance reviews and their implementation is then monitored over the course of the year.

Among other things, staff development plans include the skills needed to perform upcoming tasks, suitable on-the-job or off-the-job measures, and employees’ personal development wishes and preferences. This reinforces employees’ readiness to take responsibility for themselves and willingness to learn, and ensures they can learn new things at every stage of their development. Our proactive feedback culture and 360-degree feedback process supports continuous learning and development. A large proportion of the Company’s workforce has the opportunity to take part in these performance reviews using a structured, systematic process and to obtain additional feedback themselves. In addition, managers in the independently run companies in particular hold individual development reviews with employees.

GRI 404-3

We benchmark the success of our learning measures using a mix of tracking satisfaction with development opportunities, measuring our “return on education,” evaluating how measures have been implemented at the individual employee level during the next performance review, and cost control metrics.

## Personal Development Opportunities

GRI 404-2

### ■ 1&1 Campus

Our central training portal, 1&1 Campus, bundles internal training and e-learning offerings, giving staff quick and easy access to development opportunities within the organization. 1&1 Campus offers employees from all areas of the organization a wide range of training options in the areas of methodologies, soft skills, and professional knowledge. We assess all courses for participant satisfaction and recommendation rates to ensure we are continually improving our offering. The KPIs produced suggest they are of an extremely high quality. In addition to the courses offered by People & Organizational Development, the range also includes training designed for segment-specific customer care units, plus seminars taken from our technical training catalog, our TEC Campus, and our Online Marketing Campus – training offerings by and for employees.

### ■ TEC Campus

Our technical staff have extremely specific, in-depth knowledge. Our goal is to promote information sharing and joint learning here, which is why we have expanded our 1&1 Campus to include a platform offering training in tools, processes, and methodologies, along with e-learning material and presentations by staff for staff. The TEC Campus focuses on specialist technical training and presentations, including development practices, developer onboarding, and agile methodologies. This allows topics such as information security and business process management to reach a broader target audience. The TEC Campus also hosts internal conferences such as the TEC DAY or the PASK (Project/Agile/Scrum/Kanban) conference.

### ■ Talent management (“MyWayTo”, “Navigate”, and “Women explore”)

We use our talent development programs for proactive personal development. Individual development plans are aligned with the target positions concerned (e.g., professional development for experts and managers in the case of “MyWayTo”). Partly as a result of these measures, we were able to fill 65.71% of management positions internally in 2021 (2020: 73.65%; 2019: 70.19%).

The “Navigate” program is designed to ensure from an early stage that highly motivated high fliers remain with the Company, and to develop their entrepreneurial mindset and skills, their powers of reflection, and their ability to give and take feedback from a very early stage.

“Women explore” gives women the opportunity to increase their visibility and profile within the Company, to network with one another, and to actively examine their strengths and their career and networking strategies.

### ■ Individual offerings

New intranet pages that were launched in 2020 give an attractive and comprehensive overview of the large number of (continuing) professional development opportunities on offer, and these were systematically enhanced and expanded again in 2021 to include current issues. This provides all staff quick and easy access to all relevant information relating to human resources development and learning. We consistently incorporate feedback from our internal customers when redesigning the pages, and hence help to promote knowledge transfer within the Group.

NfS: Nonfinancial Key  
Performance Indicators

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**Function-specific Development Measures for Customer Care****■ Access Division**

Our strong customer focus means we rely on skilled employees to provide a professional service. In keeping with this, we regularly train both our (internal) employees and staff at our (external) service providers on our products and services, and on sales methods. The more our employees know, the more confident and self-reliant they will be in dealing with customers, guaranteeing high-quality customer care.

To ensure we meet this commitment to quality from the first customer contact onwards, we overhauled the training given to new call center agents in the "Learning Paths" project and put the focus on practically based content. In addition, we developed and implemented a number of different workshops and short training courses as part of the sales and quality campaigns we launched in 2020, so as to enhance external staff members' communications skills and sales performance.

A final core action item in the fiscal year was to digitalize our training and further education offerings. Key training modules were successively converted to a webinar format, and a growing number of e-learning modules published, in order to continue guaranteeing the quality of our training operations.

**■ Applications Division**

Customer care staff who serve as consultants for our retail and business customer applications have to have substantial technical expertise. Since the technologies involved are changing rapidly, they also need to keep up with the state of the art. Our training courses therefore focus not just on customer communication and sales training, but also on product and process expertise.

Since 2020, we have used our employee development program – the "Strive Towards Excellence Program," or "STEP" to support the development of our colleagues in the Customer Care Operations team. This starts with their onboarding training and goes all the way through to opportunities to become personal advisors, future trainers, or managers, among other things. The new, modular program supplements our face-to-face training offering with e-learning courses and dynamic videos. The hybrid training methods make things more interesting for our team colleagues and motivate them to use 1&1 Campus (our learning platform) more actively. In addition, e-learning offerings can be used as refresher courses following training.

One performance promise made by our IONOS brand is that a personal contact will be available to provide direct support for customers. In line with this, our training offering also focuses on continuous professional development for our personal consultants.

**Outlook**

We will continue our learning journey in 2022. We are going to update our 1&1 Campus learning management software to make it easier to offer training courses and short workshops by employees for employees, and to ensure that our success story can continue by providing access to knowledge.

## Training and Education in Figures

We are moving to centrally document the training offerings available in the individual areas, so as to make them available to a broader target group and further enhance their quality. The goal is to be able to use this central list to report more fully on the volume and types of training offered. The following table shows the figures for training and education recorded for the last three years:

<b>Training and education hours<sup>(1)</sup></b>	<b>2019</b>	<b>2020<sup>(2)</sup></b>	<b>2021<sup>(3)</sup></b>
Training and education hours per year (employees)	111,634	91,171	124,799
Per capita training and education hours (employees) <sup>(4)</sup>	11.91	9.46	13.29
Training and education hours per year (service providers)	66,481	43,527	57,414

(1) The hours for employees of our service providers vary, e.g. depending on whether new service providers are currently being deployed or new products being offered, thus necessitating time-consuming basic or product training.

(2) No classroom-based training and education courses were held in 2020 because of the pandemic.

(3) Normalization of the training and education offering, and expansion of the digital training portfolio.

(4) The information relates to all United Internet Group employees: 2019: 9,374; 2020: 9,638; 2021: 9,975.

In addition, our employees attended a total of over 900 external training courses, seminars, and conferences of varying lengths during the reporting period (2020: 480; 2019: 1,000). The year-over-year increase was due to the stabilization of the pandemic situation, which allowed face-to-face events to be held again provided that hygiene policies were observed.

## Recruiting and Retaining Young Talent

United Internet is able to recruit top performers to key positions and hence ensure that the Company can grow its business despite the extremely competitive market for IT specialists, among other profiles. Our successful recruitment strategy is based on an applicant-friendly, competitive acquisition and selection process, flanked by targeted employer marketing, partnerships with educational and training facilities, and our brands' halo effect.

## A Wide Range of Opportunities in a Growing Company

As a growing company, we offer our staff secure jobs, exciting projects, personalized training opportunities, and attractive prospects. Individual employees' career paths can be tailored to fit their wishes to a large extent, and all employees can have a hand in influencing their own development.

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## Initial Training and Education

Initial vocational and professional training has a high priority for United Internet. We train future staff and give young people a successful start to their careers. At present, we offer apprenticeships for the following commercial and technical career profiles: computer science specialists (application development/systems integration), IT systems management specialists, dialog marketing specialists, marketing communications specialists, office management specialists, and digital and print media designers. In addition, United Internet and Baden-Württemberg Cooperative State University (DHBW) offer degrees in computer science; business information systems; law, tax, and business/accounting & financial control; business administration/marketing management; and business administration/digital business management at the university’s locations in Karlsruhe, Stuttgart, and Mannheim.

GRI 102-12



All program participants work in a wide range of different departments within the organization during their three-year apprenticeship or DHBW degree. They are fully integrated with the teams and day-to-day workflows during their time there. United Internet’s unique vocational training model allows apprentices and dual degree students to actively design how they spend their time in the Company, i.e., they can choose their specialist departments in line with their interests from their second year onwards. Our apprentice workshops at our Karlsruhe and Montabaur locations were another major success. These are mainly used by technical apprentices, who spend an early part of their vocational training here to learn the basic skills that they will need later on when they are seconded to different departments within the organization. In addition to teaching specialist skills and methodologies, United Internet puts a priority during training on behavior that is in line with its system of values. This mix of technical know-how, methodological expertise, and conduct that adheres to the Company’s values forms the basis for a successful transition to the world of work once apprentices are qualified. The vocational training time spent in the Company is supplemented by (cross-location) apprentice projects. One example here is apprentices’ active contribution to, and design of, career orientation formats – something that also strengthens their interpersonal skills. As a result, our apprentices are excellently positioned to take up permanent positions later on. Since June 2020, United Internet has officially been a “Best Place to Learn” and this year it came top of the class in the “1,000 employees plus” category.

As of December 31, 2021, there were 215 young people in apprenticeships or studying throughout the Group (2020: 225; 2019: 227). In fiscal year 2021, 47 (2020: 45; 2019: 48) freshly-qualified vocational trainees and students who had completed dual studies degrees or apprenticeships with us were offered permanent positions.

## Attracting Future Talent

We work together with schools, universities, and colleges to attract fresh talent at an early stage. We have developed a variety of trainee programs offering an apprenticeship or a dual degree course (in cooperation with the Baden-Württemberg Cooperative State University (DHBW)) or helping fresh graduates find their feet in our corporate environment.

GRI 102-12

In 2021 we got involved in Offenburg University’s Mentoring Future Program with the aim of supporting young female students and offering them networking opportunities with young female employees and managers. The program allows female staff from different United Internet departments to act as mentors for young women students.

In addition, United Internet launched a talent retention program in 2021 that allows interested applicants and prospective candidates – from school students to managers – to remain in contact with the Company.



See the [„Fair Company Initiative“](#).

We also have a special responsibility to our interns. We have signed up to the Fair Company Initiative, whose members commit to providing fair conditions such as appropriate compensation and personal support. The interns who join our Company every year for placements in the IT, Product Management, Online Marketing, Finance, and HR departments regularly highlight how much they have learned from their time at United Internet.



See [„Girls’Day and Boys’Day“](#)

Above and beyond this, we offer school students short internships that give them a chance to get to know our organization and the world of work in general. What is more, United Internet cooperates and holds events with schools, as well as offering careers advice and career discovery opportunities during Germany’s Girls’Day and Boys’Days and our own in-house apprenticeship counseling.

Apprentices also offer extremely popular one-week programming courses for children and young people aged 13 and over during the summer and fall vacations. In addition, a programming work group was held for the first time in 2021, which the Company entered as a winning contribution to the “Bildungspartnerschaften digital” competition. There are plans to repeat the campaign in 2022.

Given the current pandemic situation, all these formats were revisited so that they can be offered online. The Company also digitalized its entire applications process, took part in virtual fairs, and held individual virtual presentations at schools and universities. These allowed United Internet to make progress with securing young talent despite the challenging situation.

## Diversity and Equal Opportunities

GRI 405  
GRI 405-1  
GRI 406



See the [Diversity Charter](#).

All United Internet employees should be treated with respect and have equal opportunities, regardless of their nationality, ethnic origin, religion or beliefs, gender and gender identity, age, disability, sexual orientation and identity, or social origin. They should also be able to find the environment and function in which they can make the most of their individual potential and talents.

We underlined this aspiration last year by signing up to the Diversity Charter, which commits us to creating a non-discriminatory working environment.

The following diversity statement has served as the mission statement for all of the Company’s diversity activities since 2019:

### Diversity Statement

Respect for diversity is a core aspect of United Internet’s corporate culture. The reason for this is simple: Only a workforce that mirrors the many different facets of society offers the best possible conditions for creativity and productivity, and makes employees – and the organization itself – unique. This unique diversity creates an incomparable wealth of potential ideas and innovations, increasing the Company’s competitiveness and providing opportunities for all.

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Since 2020, our diversity measures have been planned, managed, measured, and enhanced by an interdisciplinary Group-wide project team. This allowed us to specifically increase the broad impact of the potential that diversity offers the Company in the last fiscal year.

### Overarching Measures

We discuss the importance of diversity during the onboarding events for new recruits and managers, and draw attention to the internal information platform on all aspects of diversity that was set up in 2020. On it, employees and managers can find statements by our Management Board members on the topic, practical tips for ensuring a non-discriminatory daily working environment, and numerous portraits of colleagues. In addition, we have included enterprise-wide guidelines for ensuring nondiscriminatory, gender-sensitive visual imagery and language, plus the online training course on nondiscriminatory human resources decisions developed by the "Initiative Chefsache" network.

We refuse to tolerate any form of discrimination, harassment, or bullying in the workplace. We provide staff with a number of different contacts who can be approached confidentially, such as Human Resources, Compliance, and trained persons of trust. We take any indications of discrimination extremely seriously and are committed to clarifying all issues reported to us.

NfS: Implementation of Fundamental ILO Conventions

GRI 406-1

2021 also saw us take part for the first time in the "German Diversity Day" organized by Charta der Vielfalt e.V., the association behind Germany's Diversity Charter, and held a three-day virtual in-house conference in May, our "Diversity Days," which offered more than 35 sessions on the topic. The exciting and varied program featured keynotes by Management Board members, interactive workshops, reports by staff on their own experiences, panel discussions, and a whole lot more.

#### Diversity Days



Our Diversity Days allowed us to transport new ideas into the organization and made colleagues aware of the potential that diversity offers us as an enterprise – both in terms of our workforce and in terms of our customers.

99% of the nearly 1,000 staff who took part in the Diversity Days would recommend them to others, and 87% felt that the topics presented and discussed were highly relevant to their work and our organizational development – really positive feedback. As a result, we are planning to continue the Diversity Days in 2022.

Following the Diversity Days, an internal podcast series was launched featuring interviews on diversity issues with a number of well-known people in the Company. This was developed independently by female employees as part of our "Women explore" program.

See "Training and Education", on page 65 ff.

In addition, we held regular open meet-ups in German and English throughout the year at which both external and internal speakers presented topics such as bias, and non-discriminatory and gender-sensitive language. An average of roughly 80 people attended the individual sessions.

Last but not least, two colleagues from our Diversity Project Team had the chance to join a group visiting the Auschwitz Memorial and Museum in Poland from September 5–8. The motto for the visit, which took place as part of our partnership with Borussia Dortmund, was "Unite against Racism." Back

in the Company, the two reported openly on their impressions with the aim of triggering additional discussions and initiatives.

## Gender Equality

NfS: Measures to Achieve  
Gender Equality

Our diversity activities focus on promoting gender equality.

GRI 102-8  
GRI 401-1

In 2021, we achieved our goal of increasing the proportion of women in management in the top two management levels of the companies below United Internet AG to 18%. We aim to continue systematically increasing the proportion of women in the Company now we have reached the 18% target. In line with this, we will agree a new target in fiscal year 2022.

NfS: Nonfinancial Key  
Performance Indicators

The following table provides a breakdown of our staff by gender and employment type. In addition, 11.08% of our core employees worked part-time in 2021 (2020:10.69%, 2019: 10.73%).

Employees by gender <sup>(1)</sup> in %	2019	2020	2021
Women	31.88	31.78	32.31
Men	68.12	68.22	67.69
Non-binary	n.a.	n.a.	n.a.

(1) The information refers to our active employees not including student workers, school students, interns, thesis students, and temporary staff as of December 31 of the fiscal year concerned

Employees by employment type, by gender <sup>(1)</sup>	2019	2020	2021
Women, full-time	74.52	74.93	74.78
Men, full-time	96.17	96.01	95.67
Women, part-time	25.48	25.07	25.22
Men, part-time	3.83	3.99	4.33

(1) The information refers to our active employees not including student workers, school students, interns, thesis students, and temporary staff as of December 31 of the fiscal year concerned

Employees by employment contract, by region <sup>(1)</sup>	2019	2020	2021
Women, temporary employment contracts	n.a.	4.93	4.99
Men, temporary employment contracts	n.a.	7.38	7.32
Women, permanent employment contracts	n.a.	27.87	27.95
Men, permanent employment contracts	n.a.	59.82	59.74
Temporary employment contracts, Germany	n.a.	11.74	11.13
Temporary employment contracts, outside Germany	n.a.	0.58	1.18
Permanent employment contracts, Germany	n.a.	70.53	71.07
Permanent employment contracts, outside Germany	n.a.	17.15	16.62

(1) The information refers to our active employees not including student workers, school students, interns, thesis students, and temporary staff as of December 31 of the fiscal year concerned

Women accounted for 34.29% of new hires in the reporting period (2020: 33.55%; 2019: 32.88%) and 29.51% of newly recruited managers (2020: 31.15%; 2019: 19.15%). As of December 31, 2021, there were 45 (2020: 40; 2019: 37) women in the top two levels of management below United Internet AG, corresponding to a quota of 18.22% (2020: 17%; 2019: 16%). This allowed us to close the gap to the 18% figure (2020: 8 women, 2019: 6 women).



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We start actively promoting gender equality very early, e.g., by taking part in the national Girls’Day and Boys’ Day, or offering school students programming courses that are taught by our vocational trainees. We also implemented dedicated gender equality promotion measures as part of our university and professional marketing activities in the past year, such as mentoring for female students at the University of Offenburg and our attendance at two careers fairs for women. In addition, our social media channels focused repeatedly on diversity issues throughout the year.

Our “Women explore” talent and networking offering for women won the HR Excellence Award in 2020 in the “Diversity and Female Empowerment” category. A total of 49 women from all areas of the Company took part in a second offering in 2021. “Women explore” aims to increase high-potential women’s visibility and profile within the Company, to enable them to network with one another and to actively examine their strengths and their career and networking strategies, and to draw conclusions for the Company as whole. The participants attend in-person and virtual network meetings, collaborate in self-organized learning groups, and share information and opinions with the program owners on the Management Board and a variety of managers and experts. This helped raised overall awareness of the issue and triggered valuable discussions. Among other things, the participants implemented concrete initiatives based on their own ideas for ways to promote gender equality, such as forms for enabling explicit cultural dialog between the sexes or discussions about topics such as part-time working and cross-cultural exchange.

“Women explore” has also established a pool of female role models who act as discussion partners and mentors within the Company and clearly demonstrate a range of potential career paths for women at United Internet.



“Ever since I was little I knew the world I wanted to end up in. That’s why my goal is to get more women interested in IT and to use myself as an example to motivate them to show off their expertise and to talk openly and confidently about their successes.”

**Xenia Sausele**, Channel Development Manager, IONOS SE. She is one of the three finalists for the “IT Women of the Year 2021” awards in the “Digital Transformation” category. The prize honors women who have successfully implemented new technological approaches and solutions in their companies.

In addition, our role models and other female colleagues give presentations and lectures about careers at United Internet at external events. For example, this year we sponsored, and provided a speaker for, a conference that looked at agile methods, agile working, and agile management from a female perspective and created a platform for attendees to share their experience.

We provide our female managers and experts with a quarterly internal “Women in Management Network,” which addresses different topics that are relevant for this target group. Our “Ladies Lunch” and “Female Meet-up” formats offer other, informal ways of networking.

**Work/life Balance**

Diversity also depends on all employees being able to easily combine their family duties with their profession. In line with this, a pilot project offers staff the ability to work remotely from home on individual “cover days” without a particular reason.

Our external, independent family service offers tailor-made assistance where needed: support with childcare (e.g., free emergency childcare places for children up to 12 years of age); vacation programs (including virtual formats); tips on the German statutory parental allowance, kindergartens, and the like; finding home helps; and assistance with care for family members and in personal emergencies. This allowed us to offer staff ongoing support in challenging situations, particularly during the COVID-19 period.

Since 2020, we have also offered regular networking events and lectures on subjects such as parental leave and careers, and working part-time. This allows participants to swap experiences and best-practice examples. It is particularly important to us in this area to highlight fathers who work part-time as role models and to encourage a discussion about equal care.

## Diversity and equal opportunities

### Cultural Diversity

United Internet's world knows no borders: We are not just Europe's leading internet specialist with branches in many European states, but are also increasingly present around the world in countries such as the USA and the Philippines. Within Germany, too, more and more people from other countries enhance our teams. We help everyone to interact positively by holding training courses and presentations on cultural awareness. We support this as a company by providing a very wide range of support services such as a relocation service or specific onboarding offerings for international staff.

Certain divisions have adopted English as their corporate language. We offer courses for staff to learn English and German so as to ensure optimum communication on specialist subjects, and also set up tandem partnerships for peer-to-peer language learning.

In addition, we have trained people with refugee backgrounds as apprentices for several years now. Once they have completed their training, we provide them with career prospects and play an active role in integrating them into society by giving them permanent positions.

Outside Germany, United Internet employs staff in Spain, the USA, the Philippines, Romania, and the United Kingdom. Among other places. The rise of virtual collaboration is offering new opportunities and facilitating closer international cooperation. In 2021, 392 employees worked at our location in Cebu on the Philippines (2020: 395; 2019: 360). This provides technical support for IONOS in the United Kingdom and the USA. Since the Philippines are highly vulnerable to extreme weather events, the work of the local health and safety officer focuses on contingency planning and establishing strategies and procedures for ensuring the safety of the entire workforce. In addition, IONOS offered employees in Cebu help and advice on key social and economic topics such as mental health, financial wellbeing, and drug awareness for the first time in 2021. Interested staff were able to take up this voluntary offering in the form of a general presentation. A special mental health awareness training course was also held for managers. All in all, 152 people took part in the courses. This helped to promote employee health and wellbeing.

Civil society organizations and NGOs have noted that companies in the Philippines frequently do not pay the minimum wage. United Internet reviews salaries in Cebu regularly to ensure that its staff are paid more than the minimum wage.

Changes to the law governing employee compensation, such as minimum wage legislation, are fully implemented in all companies' compensation practice in all countries. We ensure that the compensation we pay our employees complies at all times with all local statutory requirements.

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**LGBTIQ+**

The PROUT AT WORK foundation raises awareness of LGBTIQ+ in the world of work with its PROUT PERFORMER awards. We are proud to announce here that our colleague Benjamin Flick was included in this year’s prestigious list of “PROUTExecutives,” i.e., queer managers. Among other things, Benjamin was involved in launching our LGBTIQ+ initiative, “queer.united.” Another of our employees, Michelle Thiele, is on the list of “PROUTVoices.” This honors queer people in business below the management level who actively drive forward the issue and give a voice to the LGBTIQ+ community.



“I had no problems coming out at work at United Internet. I am open about being gay and so far have never experienced any sort of discrimination. I want to act as a role model for other colleagues and encourage them to take the plunge and come out at work. Founding our queer employee network as part of our diversity program has enabled us to create a platform for sharing information and creating transparency about LGBTIQ+ issues. I am delighted to be part of this initiative.”

**Benjamin Flick**, Head of IONOS BI, IONOS SE.

We are proud that we have been able to lay the foundations for a platform and network for open communication among employees about LGBTIQ+ community issues, thanks among other things to the “queer.united” initiative that was founded by staff members. Issues here include overcoming any contact anxieties and creating an open and nondiscriminatory working environment. In addition, the initiative offers assistance for LGBTIQ+ specific issues such as coming out at work. The network comprises members of the LGBTIQ+ community and other colleagues who provide support for the topics involved.

In addition, since 2021 employees have been able to use optional gender pronouns in their intranet profiles to indicate how they would like to be referred to, and addressed, by other staff.

**“United in Diversity”**



As a company, we also want to help spread the topic of diversity in public. As the main sponsor and jersey sponsor for German Bundesliga football club Borussia Dortmund, we visibly took a stand together in favor of plurality and diversity, and against discrimination, in the game against Bayern Munich on March 6, 2021. The 1&1 logo was redesigned for the occasion, so that the players ran out onto the pitch wearing a shirts with a rainbow version.

## Young and Old Together

In 2021, the “Young and old together” employee-driven initiative was launched to specifically encourage communication between the generations. A regular lunchtime get-together and a working group are used to share experiences and to collect age-group specific requirements and pass them on to HR.

Employees by age <sup>(1)</sup> in %	2019	2020	2021
under 30	23.38	23.17	22.11
30-39	33.97	33.20	32.60
40-49	27.01	26.99	27.01
50 years and above	15.64	16.63	18.29

(1) Figures refer to our active employees as of December 31 of each fiscal year.

NfS: Nonfinancial Key  
Performance Indicators

The average age of our employees as of December 31, 2021, was 39.87 (2020: 39.43; 2019: 38.09). The average age of newly recruited core staff in the reporting period was 32.96 (2020: 33.02; 2019: 32.98<sup>(1)</sup>).

## Occupational Health and Safety

NfS: Occupational Health  
and Safety and Risk  
Prevention

GRI 403

Ensuring health and safety in the workplace is part of our duty of care towards our employees. Our goal as a responsible employer is to minimize accidents, illness, and risks as far as possible and to promote the health of our employees. We focus on two areas here: occupational health management, and occupational health and safety including data center safety.

All issues relating to these two areas are discussed at annual meetings. These include current developments and organizing hazard assessments, plus compliance with all statutory requirements such as surveying the impact of the COVID-19 pandemic.

(1) The 2019 figure was adjusted due to the inclusion of Strato, home.pl, United Domains, and World4You.

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Since the beginning of 2020, COVID-19 has led to a focus on establishing and implementing processes and measures ensuring compliance with the enhanced work safety standard, the German SARS-CoV-2 Occupational Health and Safety Regulation, and the health and safety rules. This was achieved in close cooperation with occupational medicine and occupational safety experts. Broadly speaking, measures were taken to address the following topics:

GRI 403-2

- The development and establishment of a company policy on the subject and preparations for crisis scenarios
- A COVID-19 hazard assessment (inspections, a list of measures, ongoing updates to measures and processes); these were given a seal of approval by BAD GmbH, our external service provider for preventive healthcare and safety engineering
- The establishment of processes for handling suspected cases and infections
- The use of behavioral and hygiene measures and rules to prevent infection
- Internal communication and training for transparency and awareness-raising, and implementation of a coronavirus healthcare portal
- Advisory and support offerings (e.g., provision of advice to risk groups by the Company medical staff, crisis hotlines, and recommendations on how to ensure ergonomic home offices)
- Modifications to mobile working processes and structures

## Occupational Health Management

We implemented an enterprise-wide occupational health management system in 2017 by setting up our Company medical service and appointing Company physicians for all locations. The structure of this Group-wide system complies with the requirements of the German Health and Safety at Work Act (Arbeitsschutzgesetz – ArbSchG). The latter clearly sets out the tasks that companies have to perform and their responsibilities, which were implemented by United Internet. Compliance with these statutory requirements is verified by supervisory authorities and the competent occupational health and safety agency, with the latter also providing technical advice on how to implement specific measures. In addition, we implemented a large number of measures for health promotion and disease prevention above and beyond the statutory requirements.

NfS: Health Protection

GRI 403-1

Among other things, occupational health management at United Internet includes hazard assessments, occupational medicine, health promotion offerings, and preventive measures designed to reduce the risk of mental and physical stress and to improve employees' work-life balance. These measures cover all core employees in Germany.

GRI 403-3

GRI 403-8

Our occupational health management activities are constantly being strategically optimized and extended. For example, we have set up bodies such as the Health and Safety Committee, whose regular meetings are used to define, evaluate, and modify measures. In addition, coordinators have been appointed at the individual locations to help with the implementation of Company-specific and preventive measures. Standardized processes have been created to help staff order specific equipment. Central interfaces have also been implemented to permit them to exchange information at

an overarching level with the staff responsible for our Employee Assistance Program (EAP), and the Health and Safety and Workplace Reintegration Management functions.

Our health management activities focus on the following areas, which are largely aimed at prevention:

- Facility Management regularly performs hazard analyses at our premises and holds fire safety drills, including evacuations.
- Since many of our employees mainly work sitting down, workplaces are regularly checked and adapted, and seated workstations replaced by adjustable-height desks where necessary. When fitting out new buildings, we take care to ensure that meeting areas in particular offer space for both sitting and standing. In addition, we provide a range of offerings on ergonomics. These include blog entries, health videos, and downloadable PDF files containing recommendations on how to work ergonomically, and on compensatory workplace exercises. Additionally, we aim to reduce employee stress in our call centers by providing anti-stress training, and teaching them how to ensure conversations remain calm and to deescalate.

GRI 403-6

- Above and beyond this, all locations provide professional health promotion and support measures that are performed by third parties. These include flu vaccinations, support from our occupational medicine staff, check-ups, and relaxation and exercise offerings such as yoga and back-strengthening courses.

GRI 403-4

- New, largely virtual health promotion formats were developed and implemented in response to the situation caused by the COVID-19 pandemic. For example, health courses that could no longer take place on-site due to the restrictions on social contact were offered in digital form. In addition, a virtual health week was held together with statutory health insurance fund BARMER as an alternative to local health day events. "B2Mission 2021" – an app-based jogging and exercise challenge – was offered instead of the normal company races. "B2Fit 2021" – a digital program on health topics such as exercise, nutrition, resilience, and sleep designed to help employees live more healthily in the long term and to enhance their wellbeing – was also piloted. In addition to the thrill of the challenge, the initiatives were designed to motivate employees to keep healthy and fit during the COVID-19 pandemic, and at the same time to strengthen the idea that we are in this together. Above and beyond this, a coronavirus healthcare portal on the intranet allows staff to obtain a sound overview and rapidly access relevant webinars and web-based courses, along with other self-help offerings and key internal information.

GRI 403-4

- One of the findings to clearly emerge from our most recent employee survey was the wish for even more health promotion offerings. To achieve this, the Health team liaised closely with departments such as the UI Learning & Organizational Development Team to continuously extend our occupational health management and health communication policy to incorporate strategic aspects and expand our offering. Exercise, nutrition, stress management, and enhancing resilience during the COVID-19 period have top priority here. We use the intranet to inform employees of our health promotion measures and offerings, and also provide a health mailbox and intranet channels that they can use to submit suggestions and ideas. In addition, we perform regular evaluations of our health promotion offerings so as to obtain feedback from employees, and regularly enhance the formats used.
- United Internet helps all employees in Germany achieve a positive work-life balance even in challenging situations through its Employee Assistance Program (EAP), in partnership with an external, independent family service. Service provider contacts are available by phone around the clock to provide confidential advice on three core topics: parental counseling/childcare, care for relatives, and personal emergencies. The parental counseling/childcare support offered covers everything from tips about the German statutory parental allowance through finding age-appropriate

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vacation childcare down to school counseling and emergency childcare. Advice on caring for relatives addresses issues associated with how to finance care and other background information on this topic, as well as finding household help and shoppers. In addition, our Family Service supports employees experiencing difficult personal situations such as stress, illness, addiction, or financial crises. It offers both preventive and support measures such as remote counseling, resilience training, mindfulness and relaxation courses, emergency psychotherapy and crisis support, plus help finding medical assistance, therapists, and clinics in acute cases. Employees are regularly informed of the service and of other health-related measures using intranet posts.

In 2022, our occupational healthcare management activities will focus on strategically enhancing our offerings, measures, and health-related communications. Among other things, the aim is to introduce a communications policy that uses multipliers to enhance the healthcare portal and internal communications. Plans exist to enhance the visibility of the Company's Occupational Health Management program by introducing a logo using the corporate design and strategically including it in the relevant channels. In addition, hybrid health promotion formats are being planned: These aim to combine face-to-face and online offerings to leverage the benefits of both formats for employees and to combat any pandemic-related cancellations of face-to-face events.

We are also planning a hazard assessment follow-up process for potential stress factors in the workplace. This will build on the results of the multi-location hazard assessment and will focus in particular on individual areas of the Company and locations. Furthermore, we are continuing to offer the training format for managers supporting employees who are suffering from psychological stress that was developed as a result of the hazard assessment and successfully rolled out in the period since 2020.

## Occupational Health and Safety, Including Data Center Safety

Annual safety inspections complying with health and safety agency/statutory rules and regulations are performed at all locations together with BAD GmbH's experts. Public authority reports are also evaluated and implemented, and a central Health and Safety Committee meeting is held. Meetings are also held at locations that have significant numbers of staff. Our health and safety activities are continuously enhanced in line with statutory/healthy and safety agency rules and regulations.

NfS: Occupational Safety

Only authorized employees have permanent access to our data centers. All such employees are obliged to attend training on the following subjects:

GRI 403-5

- How to behave if there is a fire
- How to behave in an emergency
- First aid courses run by the DGUV (Germany's statutory accident insurance scheme) that are specially tailored to data center environments
- First aid emergency training in the use of automated external defibrillators (AEDs)
- Fire prevention training that is specially tailored to data center environments
- Safety training for electrical equipment
- Practical training in category III personal protective equipment (PPE)

GRI 403-7

In addition, we organize appropriate training for those employees who are responsible for powering up and booting servers. We work together with Verwaltungs-Berufsgenossenschaft (VBG), the German occupational health and safety agency, to train safety officers for each operations team, who then attend regular courses. We also receive support from an external specialist for occupational safety and physical fire protection. We use an internal communications platform to provide employees with emergency manuals, work instructions, and rules to be followed. Signature logs ensure that the relevant safety regulations have been taken on board.

The beginning of 2022 will see the successive implementation of the hazard assessment process, with BAD GmbH acting as the process manager, and central documentation of all work areas and areas of activity. At present, the relevant documents and workflows are being adapted to current requirements together with our service provider. We also plan to increase the number of volunteer firefighters and hold a new training course.

## Employee Absences in Figures

NfS: Nonfinancial Key  
Performance Indicators

The goal of the measures described above is to reduce stress-related absences and accidents at work. We want to continue analyzing the causes of absences and accidents together with our occupational medicine specialists, so as to identify any other measures that may be necessary.

GRI 403-2

GRI 403-9

GRI 403-10

<b>Absentee rate<sup>(1)</sup></b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Absence due to illness (in %)	5.75	4.40	4.31
Number of accident reports	33	41	40
thereof on the way to and from work (in %)	21.21 <sup>(2)</sup>	21.95	10.00

(1) Figures refer to our all core employees in Germany.

(2) Fluctuations in accidents on the way to and from work are due to the weather, among other things.



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# CLIMATE AND ENVIRONMENTAL PROTECTION

## Management Approach

### Materiality, Impact, and Risks

The internet and telecommunications services that we offer are based on our network infrastructure and data center operations. These are responsible for by far the bulk of energy used within the Group. This energy usage and the resulting carbon emissions impact the environment and the climate. Other, lesser, contributory factors include the use of power in our office buildings, of fuel for vehicles, and of materials in our logistics operations in particular, as well as of our own IT hardware. Given our plans to build a 5G network, our energy consumption can be expected to increase further in future.

In addition, our business relationships have a material impact on the environment, especially from the use of our business partners' mobile networks and fixed networks, and the energy consumption associated with this. Environmental impacts also result from the use of energy and resources, and from potential pollution along the value chain for the devices and products (especially smartphones, tablets, and routers) that we offer. Factors here range from their manufacture through shipping to customers down to their disposal.

Above and beyond this, the role of digitalization as an enabling technology for greater climate protection should be emphasized, both in our own business and in relation to products and business relationships<sup>(1)</sup>. One precondition for such a positive effect is that the additional energy requirements are not met from fossil fuels but from renewable energies, since otherwise the use of digital technologies, algorithms, blockchain, and the like would be accompanied by larger carbon footprints. In addition, it can be expected that the new 5G mobile network standard will lead to an increase in electricity consumption, among other things because it offers new technological opportunities such as the ability to network machinery and vehicles (this is known as the "Internet of Things" or IoT).

Environmental and climate protection are relevant for a large number of stakeholders. This can be seen both at the level of society as a whole, e.g., in the Fridays for Future movement, and with our employees, whose interest in environmental protection can be seen in many areas of their daily work. The topic is increasingly being addressed at a political level, e.g., through Germany's Climate Protection Program, carbon pricing, the Paris Agreement, and the UN Climate Change Conferences (Conference of the Parties – COPs). It is also becoming more and more of an issue for investors and analysts when selecting investments, while customers emphasize the importance of using green energy e.g., for cloud products, as is the case for IONOS.

**We aim to use resources efficiently and to contribute to climate protection.**

Climate change poses physical risks, especially due to rising temperatures, which lead to the need to cool data centers more, but also to increasingly extreme/severe weather conditions that could cause infrastructure damage and therefore impact our Company directly in both areas. However, the topic also has an indirect impact on United Internet above and beyond this. As an energy user, the organization needs to reduce its carbon emissions if it is to avoid potential market and reputational risks, along with greater negative impacts on the climate. In addition, political and technological risks arising from urgency of the topic must be borne in mind; one potential example here is stricter legislation requiring corresponding effort and expense to implement. If our various stakeholders'

NfS: Impact of the Company's Business Activities

GRI 103-1

GRI 201-2



See "Customer-related Matters and Product Responsibility" on 27 ff.



See "United Internet as a Business Partner" on page 96ff.



See "Corporate Digital Responsibility" on page 39ff.

NfS: Risk Prevention

<sup>(1)</sup> See e.g., the [Bitkom article](#) (German only) dated March 2021.

expectations are not met, this could negatively impact our reputation, revenues, or earnings; conversely, positioning ourselves positively here could offer opportunities.<sup>(1)</sup>

## Goals and Measures

NfS: Policies Pursued

GRI 103-2

The management approach aims to promote the efficient use of resources, enabling us to cut costs and contribute to climate protection. Particularly in view of our energy consumption, our goal is to continuously increase the efficiency of our infrastructure, and especially of our data centers. Although a reduction in our absolute consumption would be desirable, this is not a realistic goal given the increasing digitalization of the economy and society. This applies both to our data centers, which in their role as the backbone for digital applications are experiencing increasing demand, and to our fiber-optic network, which is by far the most powerful transmission technology and hence especially sought-after.

NfS: Use of Renewable and Nonrenewable Resources

We deploy management systems to optimize our consumption of resources in key areas, including energy usage. The data centers operated by IONOS and Strato are certified in accordance with ISO 50001, while an ISO 14001-based environmental management system (EMS) is used for the fiber-optic network. Regular operations at those of our data centers owned by IONOS Holding and 1&1 AG are climate neutral, since they source electricity generated from renewable energy ("green electricity") and offset the proportion generated from nonrenewable energy sources. We also reduce the impact of our fiber-optic network operations by using green electricity. In addition, we aim to minimize the consumption of resources and materials, e.g., in our logistics operations, and to enable our customers to dispose of their products and hardware in an environmentally friendly manner. Please see the following sections for further details.

IONOS Holding's data centers are managed by the TechOps Hosting and Data Center units, which report directly to IONOS SE's or Strato AG's CTOs. The specialists in these units work together with Technical Control to manage electricity consumption and energy efficiency.

## Results and Assessment

NfS: Results of Policies Pursued

GRI 103-3

Energy consumption is measured in all relevant areas and, where this makes sense, is also examined on a relative basis (e.g., per employee or in proportion to revenue), so as to take growth effects into account, for example. In addition, management systems are used to constantly optimize consumption, particularly in data center and fiber-optic network operations. We aim to use this and other data in future to calculate our carbon footprint; this will document and quantify the material sources of greenhouse gas emissions ("hot spots") more and more comprehensively going forward. Please see the following sections for further details.

<sup>(1)</sup> Irrespective of the materiality of climate and environmental protection demonstrated, the EU Guidelines recommend reporting on climate issues even if they are only material from one of the two possible perspectives (either "environmental and social" or "financial").

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## Contribution to the SDGs



Ensure sustainable consumption and production patterns.



Take urgent action to combat climate change and its impacts.

## Energy Consumption

Our network infrastructure and the server capacity provided by our data centers are needed to supply internet and telecommunications services to our customers. At the same time, their operation accounts for most of our energy consumption. Roughly half of the Group's expenditure on electricity comes from our global data center operations. Most of the other half results from our fiber-optic network operations; the small remainder is attributable to our office buildings. Further details on the information given in the following table can be found in the relevant sections.

NfS: Environmental  
Matters/EnergyGRI 302  
GRI 302-1  
GRI 302-2  
GRI 302-3  
GRI 302-4  
GRI 305  
GRI 305-1  
GRI 305-2  
GRI 305-3NfS: Nonfinancial Key  
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Energy consumption	2019	2020	2021
Electricity consumption - data centers in MWh	133,807.96	131,025.85	132,197.61
Electricity consumption - fiber-optic network in MWh	59,599.17	56,665.61	56,589.06
Electricity consumption - office buildings in MWh <sup>(1)</sup>	7,068.83	6,556.84	12,409.34
<b>Total electricity consumption in MWh</b>	<b>200,475.96</b>	<b>194,248.29</b>	<b>201,196.01</b>
<b>Heating consumption (natural gas and heating oil) in MWh</b>	<b>2,859.01</b>	<b>3,130.86</b>	<b>3,426.24</b>
Gasoline consumption in MWh	607.06	756.53	953.10
Diesel consumption in MWh	13,223.90	8,824.18	7,005.11
<b>Total fuel consumption in MWh<sup>(2)</sup></b>	<b>13,830.96</b>	<b>9,580.71</b>	<b>7,958.21</b>
<b>Total energy consumption in MWh</b>	<b>217,165.94</b>	<b>206,959.87</b>	<b>212,580.46</b>
Revenue in € million	5,194.1	5,366.2	5,646.2
Energy intensity (ratio of energy consumption to revenue) in Wh/€	42.07	38.57	37.65

(1) The increase in electricity consumption is attributable to an expansion in data collection due to the inclusion of additional sites and companies (Strato and Versatel).

(2) Conversion factors/calorific values: gasoline: 8.5 kWh/l; diesel: 9.7 kWh/l. The decline in fuel consumption in 2020 and 2021 is due to the restrictions caused by the COVID-19 pandemic and to the new Guidelines on Working from Home introduced at the Company.

## Electricity Consumption in Our Data Centers

IONOS Holding's high-performance data center operations are georedundant, making the services we provide to our customers as secure and reliable as possible. This approach ensures that power outages and environmental factors do not affect the operation of the applications concerned, and gives our customers unconstrained, permanent access to them. This added reliability comes at the cost of increased electricity consumption, which we address by using renewable energy and constantly improving our energy efficiency.

### Climate Neutrality and the Use of Renewable Energy

We have used electricity from renewable energy sources for our data centers in Germany for more than a decade now. Green electricity is now the main source of supply for our locations in all countries. We only still use certificates to offset carbon emissions at a few locations, or if there is no alternative for technological or organizational reasons. As a result, we are able to operate IONOS Holding's and 1&1's data centers climate-neutrally. All 1&1 Mail & Media Applications SE's servers in Germany are run at IONOS data centers, meaning that regular operations of these as well as of IONOS's servers are climate neutral. Using renewable energy from nearby geographical areas – mostly in the same country or an adjacent region – is another priority. What is more, IONOS has been a certified VMware Zero Carbon Committed Partner since the end of the 2021 reporting period. This initiative honors cloud providers that have undertaken to develop their services in an emissions-free manner and to only power their data centers with renewable energy by 2030.

The following table shows the electricity consumed in our data centers and other data centers belonging to the Group, along with the carbon emissions that we avoided.

<b>Electricity consumption and carbon emissions for data centers<sup>(1)</sup></b>	<b>2019</b>	<b>2020<sup>(2)</sup></b>	<b>2021</b>
Electricity consumption in MWh	133,807.96	131,025.85	132,197.61
Energy intensity (ratio of electricity consumption to revenue) in Wh/€	25.76	24.42	23.41
CO <sub>2</sub> equivalents in tonnes <sup>(3)</sup> (Scope 2)	0	0	0
Avoided CO <sub>2</sub> equivalents in tonnes <sup>(4)</sup>	57,828.26	48,891.36	45,977.63

(1) The figures refer to our 10 own and our rented data centers; they relate to the data centers for IONOS, Arsys, Fasthosts, and Strato, plus the data centers for IONOS Cloud, home.pl, InterNetX, and World4You. Electricity consumption for 1&1 AG's data centers is included under the energy consumption data for its office buildings, since it is not currently possible to capture consumption separately.

(2) The reduction in electricity consumption in the reporting period 2020 is due to a number of factors; see the section entitled "Increased energy efficiency"

(3) Climate-neutral thanks to the mix of renewable energy sources and carbon offsets. The figures for CO<sub>2</sub> equivalents show the contribution made to the greenhouse gas effect. In addition to CO<sub>2</sub> itself, they comprise other greenhouse gases such as methane and dinitrogen monoxide.

(4) Approximate figure calculated on the basis of the average annual and country-specific CO<sub>2</sub> emissions per kilowatt-hour of electricity consumed; emissions from the electricity mix in the various countries are falling over time, due among other things to the growing proportion of renewable energy used.

### Managing Consumption with an ISO 50001-compliant Energy Management System

In 2018, we took the decision to introduce an energy management system (EnMS) complying with ISO 50001. This EnMS covers the IONOS and Strato data centers that we operate ourselves and in which we can therefore manage energy consumption. Using it allows us to continuously pursue our goals of increasing energy efficiency and ensuring transparency. As a result, the EnMS helps identify and remedy potential energy wastage, hence cutting costs, and to identify and comply with external requirements such as regular energy audits. In this way, it makes an important contribution to sustainability

NfS: Use of Renewable and Nonrenewable Resources



See [Zero Carbon Committed Initiative](#)

NfS: Nonfinancial Key Performance Indicators

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management and can have a positive impact on our reputation and market position. The EnMS was successfully audited and certified in 2021.

The head of TechOps Hosting at IONOS and the Data Center unit manager at Strato are responsible for the EnMS and its strategic focus. In addition, a designated energy manager ensures that the EnMS is aligned with our targets, and manages the Energy Team. The latter comprises the regional staff responsible for this topic at the IONOS and Strato data centers in the various countries concerned (Germany, France, Spain, the United Kingdom, and the USA). In addition, a management system manager has been appointed.

## Increased Energy Efficiency

The air conditioning system at the Logrono data center in Spain was successfully renewed in 2021. As a result, we already made energy savings of 10% in the reporting period. 2022 will see the commissioning of our new, high-performance data center in the Birmingham region of the UK. This will replace the existing UK data center in Gloucester in the coming years. The project aims both to increase capacity and to enhance operational efficiency in the United Kingdom. Current plans expect an improvement in energy consumption of at least 20% in comparison to the existing data center.

NfS: Use of Renewable  
and Nonrenewable  
Resources

In addition, we are implementing a continuous stream of projects and measures to reduce electricity consumption and increase energy efficiency:

- We are steadily increasing capacity utilization per server, thus reducing the number of servers required.
- We replace old servers with more modern and more energy-efficient hardware at an early stage.
- Some server hardware is built to order for United Internet, allowing us to avoid unnecessary components and deploy e.g., energy-saving processors and power supply units that are designed to minimize heat losses.
- The web hosting system used by United Internet Group companies is a highly optimized, proprietary, Linux-based system that allows data from thousands of customers to be managed on a single server, and hence optimizes our use of resources.
- Virtualization is increasingly enabling us to replace bare metal servers by virtual servers.
- The use of containers avoids the need for redundant operating system kernel operations; instead, the kernel is shared by all instances, enabling even more elastic, load-based scaling of the IT resources provided.



Bare metal server: A  
server that hosts a single  
customer or user.

## Balanced Design – The New Standard for All Future Data Center Projects

The demands placed on data centers are increasing all the time – both in terms of performance and regarding environmental aspects. The challenge for operators is to find a balance between ensuring high-availability, secure operations on the one hand, and cost and energy efficiency on the other. When it became clear in 2019 that efficiency targets at one of the Group’s data centers in the United Kingdom could not be met, constructing a new data center soon emerged as a cost-effective solution. The next step was to design this so as to offer the right combination of availability, energy efficiency, construction time, and simple, flexible operations. Structured project planning allowed IONOS to implement an extremely cost-effective data center. The new design focuses on the elegant arrangement of the technical components and is based on the concept of distributed redundancy. The latter was designed throughout in line with the Uptime Institute Tier IV classification – one of the most highly redundant operating standards in the data center ecosystem.

The new data center design also features a “pay as you grow” approach. All data centers that are newly built by us, including the one in the United Kingdom, are constructed in such a way that they can be extended on the fly at any time if needed. Only essential components are installed and operated to start with – a highly cost-effective approach. As a result, there are no excess units that have to be replaced at some point because they are showing signs of age even though they have never been used. This conserves valuable resources and saves on maintenance costs, while equipment that has not yet been installed also does not consume any power. IONOS uses this approach for large components such as UPS units, cooling generators, and cooling units. The new data center design gives IONOS a scalable, energy-efficient, state-of-the-art server and cloud infrastructure that offers high availability and an attractive price-performance ratio to match. The success of the design means it will be used as the new standard for all future data center projects at IONOS.

## Electricity Consumption by Our Fiber-optic Network

Our fiber-optic network ensures economic efficiency and enables society to benefit from increasingly powerful, rapid data transfer. Today’s technology currently permits internet speeds of up to 100 GBit/s and represents the most powerful transmission technology by far. What is more, demand for higher bandwidth is constantly rising. However, since fiber optics are not available everywhere in Germany yet, 1&1 Versatel is continuing to constantly expand our fiber-optic network. Extensive additions were made to 1&1 Versatel’s network in recent years, with the addition of powerful network technology further optimizing it for our customers. Our fiber-optic network was approximately 52,600 km long at the end of the 2021 reporting period, compared to roughly 50,900 km in 2020. This continuous network expansion means that 1&1 Versatel has one of the largest and most powerful fiber-optic networks in Germany and already provides a large number of cities and municipalities with high-speed internet services.

Since 2012, 1&1 Versatel has managed energy consumption using an ISO 14001-based environmental management system (EMS). We also give reducing our electricity consumption and associated environmental impacts a high priority in our fiber-optic network operations. The measures that need to be taken to achieve this are developed on the basis of the data from the EMS.

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1&1 Versatel's environmental management activities are centered on its major technical locations, which were identified in an ABC analysis as being the largest consumers of electricity. A substantial 49.55% (2020: 46.07%; 2019: 42.78%) of total electricity consumption was attributable to 1&1 Versatel's 35 largest locations in the 2021 reporting period; the remaining 50.45% (2020: 53.93%; 2019: 57.22%) was distributed across approximately 2,374 (2020: 2,384; 2019: 2,334) locations owned or leased by the company.<sup>(1)</sup> As a result, the EMS is specifically deployed at these major locations in order to hit optimization targets, and to manage consumption and cost trends. The air conditioning technology in use at our major locations in Münster, Dortmund, Mainz, and Freiburg was optimized in the 2021 reporting period. We installed direct and indirect free cooling systems here that utilize cool outside air where possible for air conditioning. In addition, we installed more effective UPS systems at a number of locations. We also converted the lighting at many sites to state-of-the-art, efficient LED versions.

NfS: Use of Renewable  
and Nonrenewable  
ResourcesNfS: Greenhouse Gas  
Emissions

In addition to the electricity that it sources itself at its 35 largest and other locations, 1&1 Versatel is connecting its fiber-optic network with fiber-optic networks and colocation sites belonging to well-known regional city carriers and network operators and, to an increasing extent, with Deutsche Telekom's BNGs (Broadband Network Gateways). In these cases, 1&1 Versatel does not manage electricity purchasing itself.

The following table shows 1&1 Versatel's electricity consumption and the locations where 1&1 Versatel is a user.

NfS: Nonfinancial Key  
Performance Indicators

<b>Electricity consumption and carbon emissions for the fiber-optic network<sup>(1)</sup></b>	2019	2020 <sup>(2)</sup>	2021
Own electricity consumption in MWh <sup>(3)</sup>	39,707.16	34,614.09	35,441.07
Electricity consumption at business partners caused by 1&1 Versatel <sup>(3)</sup> in MWh	19,892.02	22,051.51	20,743.39
<b>Total electricity consumption in MWh</b>	<b>59,599.17</b>	<b>56,665.61</b>	<b>56,589.06</b>
CO <sub>2</sub> equivalents in tonnes (Scope 2; own electricity consumption) <sup>(4)</sup>	18,821.19	13,880.25	13,119.51
CO <sub>2</sub> equivalents in tonnes (Scope 3; electricity consumption caused by 1&1 Versatel) <sup>(4)</sup>	9,428.82	8,842.66	7,592.08
<b>Total carbon emissions in metric tonnes</b>	<b>28,250.01</b>	<b>22,722.91</b>	<b>20,711.60</b>

(1) The figures cover electricity consumption for all 1&1 Versatel's technical locations, plus locations where 1&1 Versatel is a user. The electricity consumption figures for 2019 also include electricity consumption at 1&1 Versatel's office locations, since this data was not available separately. Electricity consumption is not increasing despite the expansion of the network, as it is being steadily reduced by efficiency measures.

(2) The figures for individual locations for which no readings are currently available are based on estimates; there is a delay before the data for energy consumption given for the years in question is allocated to specific time periods due to fluctuations in the reading and billing dates. Consequently, figures for prior periods may change after the report is published.

(3) A proportion of the energy used is green energy (2021: 21,147.99 MWh). This figure has not been disclosed in a separate line since it was not possible to perform a breakdown for the previous years.

(4) Estimate based on the data provided by the Umweltbundesamt (the Federal Environmental Agency) for CO<sub>2</sub> emissions per kilowatt hour in the German electricity mix (2019: 474 grams; 2020: 401 grams; 2021: 366 grams). Actual emissions are lower due to the use of green electricity, although the proportion attributable to the latter cannot be quantified exactly.

(1) The figures for individual locations for which no readings are currently available are based on estimates. The percentages used for 2020 were adjusted in the 2021 reporting period.

## Energy Consumption by Our Office Buildings

NfS: Use of Renewable and Nonrenewable Resources

Our office buildings account for a comparatively small proportion of our energy consumption. In addition, a significant share of the electricity purchased in the reporting period was certified green electricity, something that reduces the potential environmental impact.

NfS: Nonfinancial Key Performance Indicators

<b>Energy consumption and carbon emissions for office buildings</b>	2019	2020	2021
Electricity consumption <sup>(1)</sup> in MWh	7,068.83	6,556.84	8,184.70
Heating consumption (natural gas and heating oil) <sup>(2)</sup> in MWh	2,859.01	3,130.86	3,426.24
<b>Total energy consumption in MWh</b>	<b>9,927.84</b>	<b>9,687.70</b>	<b>11,610.94</b>
CO <sub>2</sub> equivalents from electricity consumption in tonnes (Scope 2)	451.30	418.86	3.06
CO <sub>2</sub> equivalents from heating consumption in tonnes (Scope 1)	587.52	640.61	452.19
<b>Total carbon emissions in tonnes<sup>(3)</sup></b>	<b>1,038.82</b>	<b>1,059.47</b>	<b>455.25</b>

- (1) The figures relate to the offices and related infrastructure at United Internet's locations in Montabaur, Karlsruhe, and Munich, which are supplied directly by the utilities concerned. They also include Vienna and the 1&1 AG locations in Maintal, Krefeld, Dresden, Nuremberg, Munich, and Münster, and the United Internet locations in Düsseldorf and Hamburg as well. The figures for the 1&1 AG companies also include electricity consumption by the 1&1 AG data centers (this data has not been disclosed separately to date). Not all figures were available by the editorial deadline for this report.
- (2) The figures relate to the Montabaur location including the logistics center plus the 1&1 AG location in Maintal (natural gas) and one location in Karlsruhe that uses heating oil. Not all figures were available by the editorial deadline for this report.
- (3) Calculated using the utilities' data on CO<sub>2</sub> emissions per kilowatt hour, the conversion factors provided by DEFRA (the UK's Department for Environment, Food and Rural Affairs) for 2019, 2020 and 2021 and the data provided by the Umweltbundesamt (the Federal Environmental Agency) for CO<sub>2</sub> emissions per kilowatt hour in the German electricity mix (2019: 474 grams; 2020: 401 grams; 2021: 366). Green electricity, which does not result in any CO<sub>2</sub> emissions, was used in some cases.

## Material Consumption and Logistics

NfS: Environmental Matters/Materials

GRI 301

As an access and applications provider, our business with physical products makes particular use of electronic devices and hardware. Applications are developed internally or together with partner organizations, and are operated on more than 90,000 servers in our 10 data centers. In contrast, the Consumer Access Segment primarily provides our customers with information and communications technology hardware (ICT) in the form of devices such as smartphones and routers, tablets, laptops, web surfing hardware, and accessories, along with rate plans for using our mobile network and broadband services. In addition, our employees use IT hardware to perform their tasks.

## Customer Hardware

### Device Disposal

NfS: Environmental Matters/Environmental Impact of Our Products and Services

GRI 417-1



<https://www.1und1.de/entsorgung/#annahmestellen-finden>

Smartphones, routers, and other devices that we provide our customers may contain components that cannot be disposed of as household waste. Our job is to take responsibility for these products' entire life cycle, and to recycle materials properly after use so that no pollutants are released into the environment as waste. We have signed a waste disposal contract with our partner, specialist waste disposal service provider Interseroh, to ensure that the devices that we supply can be disposed of in an environmentally friendly manner. We inform customers about how to dispose of their mobile and landline hardware professionally every time we make a delivery, and list Interseroh's collection points on our website. This ensures that all customers have the opportunity to return their old equipment for recycling or disposal.



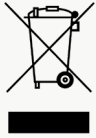
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Both European directives and Germany's Electrical and Electronic Equipment Act (Elektronikgerätegesetz – ElektroG) ban the disposal as household waste of old equipment and all electronic parts included in deliveries, and require them to be disposed of professionally to permit recycling. The goals are to protect the environment and health, and to conserve resources.

According to industry association Bitkom, there were roughly 206 million old cellphones and smartphones in circulation in Germany in 2021 that were no longer in use but still worked or could be recycled. In other words, according to Bitkom this figure has doubled since 2015, when there were 100 million such unused old devices. An efficient circular economy requires such devices to be reused or professionally recycled so as to ensure that valuable raw materials such as precious metals and rare earths can be recovered.

## Reusing Smartphones

A number of Drillisch brands have been offering refurbished devices since 2019. In 2021, this option was available for the yourfone, winSIM, smartmobil.de, maXXim, and galaxyexperte.de brands. All customer cellphones that are returned within 30 days are checked thoroughly and tested for reusability. This involves deleting all personal data on the device, checking the functionality in-house, and also checking for wear and tear. If the devices are in perfect working order, they are cleaned and polished, and any missing accessories (headphones, charging cables, etc.) are supplied. These returned devices are marketed at a significant discount to the price of new ones. They are in perfect working order, have been quality assured, and come complete with accessories, original packaging, and a 24-month guarantee. In addition to the price benefits for customers, this conserves key resources and reduces the use of supply chains, hence cutting carbon emissions. Internal handling of returned devices was expanded in the 2021 reporting period using a standard reclamation process. A dedicated team is responsible for this.

The 1&1 trade-in campaign, which is also known as the "1&1 Trade-in Bonus," offers a transparent, customer-friendly way of returning used cellphones, tablets, and notebooks. More than 26,000 old devices were received within a year of the 1&1 Trade-in Bonus program being launched, and were forwarded to a sustainable recycling process by 1&1. 1&1 combines the goal of conserving resources with a financial incentive for clients. Customers can exchange their old devices for a bonus when ordering new ones. This can be up to several hundred euros, depending on the model concerned. The trade-in bonus is credited directly to customers' bank accounts when the old device has been received. Roughly 5,200 kg of old electronic devices have been recycled as a result. This conserves valuable resources and cuts waste.

In addition, 1&1 introduced free use of the 1&1 LTE antenna hardware required for the use of its "Sofort-Start-Option" and "Sofort-Online" products. This means that customers no longer have to buy the hardware when they enter into the contract. Rather, they simply return it free of charge after use to 1&1. After this, it is checked and, if necessary refurbished, before being made available to the next customer. This avoids the need for a six-figure number of newly produced devices every year, conserving valuable resources and massively reducing the volume of functioning hardware being consigned to waste.

## Hardware in Data Centers and Office Buildings

GRI 102-12  
GRI 301-1

For over 11 years now, we have ensured that internally used servers and network equipment are recycled in an environmentally appropriate way when they are retired by passing them on to recycling specialist AfB gGmbH. This organization recycles them professionally or reclaims them for reuse, prolonging the life of the hardware and conserving resources. AfB is a disability inclusion company; according to its own figures, roughly 45% of its current employees are people with disabilities. This means we not only ensure our hardware is handled by environmental and recycling experts, but also improve employment opportunities for people with disabilities.

NfS: Nonfinancial Key  
Performance Indicators

AfB reclaimed or recycled the following volumes of old IT equipment for us over the past three years:

GRI 305-3

Old IT equipment	Number of devices			Reclaimed and reused in %			Raw materials recovered through recycling in %		
	2019	2020	2021	2019	2020	2021	2019	2020	2021
PCs	650	784	202	87.38	87.63	74.76	12.62	12.37	26.24
Notebooks	1,355	703	881	97.05	93.60	95.35	2.95	6.40	4.65
Tablet <sup>(1)</sup>	n.a.	51	17	n.a.	23.53	52.94	n.a.	76.47	47.06
Flat-screens	858	1,080	324	44.98	72.59	47.82	55.01	27.41	39.2
Mobile devices	620	561	435	44.19	30.84	60.8	55.81	69.16	52.18
Servers	8,882	6,391	5,076	42.03	50.04	20.02	57.97	49.96	79.98
Printers	5	17	18	0.00	64.71	27.78	100.00	35.29	72.22

(1) The "tablet" category was reported separately by AfB in the 2020 reporting period. Since these devices were included in the "flat-screens" category in previous years, no figure can be provided for 2019.

In 2021, we delivered 129.83 tonnes (2020: 172.39 tonnes; 2019: 183.39 tonnes) of hardware to AfB, helping to save 365.37 tonnes (2020: 973.33<sup>(1)</sup> tonnes; 2019: 146.75 tonnes) of CO<sub>2</sub> equivalents. All in all, our 11-year partnership has already saved 6,991.03 tonnes of CO<sub>2</sub> equivalents from 1,866.55 tonnes of IT equipment and mobile devices.

## Logistics and (Secondary) Packaging

Part of our business involves providing our customers with products such as smartphones and routers so they can use our services. This task is performed for all 1&1 AG brands by our own logistics center in Montabaur. (Secondary) packaging and information materials are needed to protect and dispatch these products. In addition, we send access data, for example, by post for security reasons. The (secondary) packaging materials that we use largely comprise paper, paperboard, and cardboard (PPC) with a high recycled content of 75–80%. We aim to continuously optimize our use of materials, e.g., by reducing transportation packaging.

(1) These figures cannot be compared with those for the previous year due to the update to the life cycle assessment and the inclusion of additional types of IT equipment and mobile devices.

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## Materials Used for Shipments

The total number of letters and packages shipped by our logistics center increased by approximately 5.7% year-over-year (2021: 6.38 million; 2020: 6.03 million; 2019: 6.89 million). At the same time, the consumption of packaging materials (both plastic and PPC) has been reduced since 2019. The main reason for this was a change in the law in 2019.

NfS: Nonfinancial Key  
Performance IndicatorsGRI 301-1  
GRI 305-3

We report the amount of (secondary) packaging used in shipping and selling products annually, both to our waste disposal partner and in parallel to the packaging register, LUCID (an online platform run by the Foundation for the Central Agency Packaging Register (ZSVR)). The process has changed compared to 2019 as a result of the introduction of the new German Packaging Act (Verpackungsgesetz – VerpackG). Organizations introducing packaging covered by the system onto the market for the first time on a commercial basis in Germany (“initial introducers”) must register with LUCID and report the amounts of packaging involved. As a result of the change in the law, 1&1’s logistics operations are now considered to be the initial introducers for fewer packaging materials than was previously the case. Instead, the manufacturers themselves have to pay the packaging fees, and to report the amounts involved, in a larger number of cases.

As a result, 1&1’s logistics operations did not produce any significant amounts of plastic in 2021. The use of PPC also fell from 432.69 tonnes in 2020 to 430.02 tonnes in 2021. The volume of materials required depends on, for example, the relative proportions of devices or SIM cards shipped, and can therefore fluctuate over the years.

NfS: Greenhouse Gas  
Emissions

<b>Packaging materials<sup>(1)</sup></b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Total paper, paperboard, and cardboard (PPC) consumption in tonnes	458.10	432.69	430.02
Total plastic consumption in tonnes	0.50	0.00	0.00
Number of shipments in millions	6.89	6.03	6.38
Amount of PPC per shipment in grams	70.38	71.70	67.41
Amount of plastics per shipment in grams	0.07	0.00	0.00
CO <sub>2</sub> equivalents in tonnes <sup>(2)</sup> (Scope 3)	10.37	9.22	9.16

(1) The figures relate to 1&amp;1 AG in its entirety.

(2) Calculated on the basis of the conversion factors published by DEFRA for 2019, 2020 and 2021.

SIM cards for Drillisch Online’s brands are sent using recycled envelopes that are stamped with Germany’s “Blue Angel” label logo. Recycling of (secondary) packaging materials by our service providers Landbell AG and “Duales System Deutschland GmbH – The Green Dot” led to the equivalent of 223.73 tonnes of carbon emissions being saved in 2020<sup>(1)</sup> (2019: 223.26 tonnes<sup>(2)</sup>).

Our logistics operations also aim to reduce the use of transportation materials when servicing is required (e.g., when a faulty piece of equipment has to be replaced for a customer). Where loaned devices have to be exchanged, customers receive the new device from a selected delivery service, which replaces the device directly on site. The new device is delivered in specially developed reusable shipping packaging that can be used to return the old device directly. This not only reduces material costs but also saves customers time. In addition, we expanded our returns management in 2020 – a move that led to its further professionalization during the 2021 reporting period, with structural modifications being made to the working environment and the workstations being optimized.

(1) The figures for the current reporting period were not available by the editorial deadline for this report.

(2) The data for 2019 only covers Landbell AG.

## Emissions from Shipping Distances

NfS: Environmental Matters/Transportation

We started including the shipping distances associated with our logistics operations as from 2019, in keeping with our aim of reporting more and more of the greenhouse gas emissions we cause.

GRI 302-2  
GRI 305-3

Packages destined for our customers are delivered by our logistics services providers (these include DHL, Hermes, and GLS). An internal estimate suggests that, all in all, our packages traveled approximately 809.84 million km in 2021 (2020: 886.32 million km; 2019: 875.38 million km). This corresponds to a year-over-year decrease of 76.48 million km. Based on the information and estimates provided by our logistics services providers, this generated approximately 1,422.39 tonnes of greenhouse gas emissions (2020: 1,695.24 tonnes; 2019: 1,904.02 tonnes)<sup>(1)</sup>. These emissions were not generated by our organization itself, but are the result of our business activity and therefore count towards our Scope 3 emissions.<sup>(2)</sup>

NfS: Nonfinancial Key Performance Indicators and Greenhouse Gas Emissions

Shipping distances	2019	2020	2021
Kilometers traveled for package deliveries in millions <sup>(1)</sup>	875.38	886.32	809.84
CO <sub>2</sub> equivalents in tonnes <sup>(2)</sup> (Scope 3)	1,904.02	1,695.24	1,422.39

(1) Estimate based on the distances between the target locations and the logistics center in Montabaur; the figures do not include upstream journeys to depots, detours, any multiple deliveries, or returns; mean figures were calculated in some cases.

(2) The figures are based on the information and estimates supplied by our logistics services providers. The figures for 2019 and 2020 were adjusted in the 2021 reporting period due to the harmonization of the method used for capturing carbon emissions data. They are reported using the "well-to-wheel" (WTW) method and are based on the information supplied by the service providers.

In addition, we source our packaging and printed materials from local suppliers, avoiding transporting them for long distances and reducing carbon emissions.

## Paper Consumption

GRI 301-1  
GRI 305-3

We have been working together with GDW (Genossenschaft der Werkstätten für behinderte Menschen Mitte eG), which destroys and recycles our old physical files, for more than four years. Not only do GDW's recycling operations help protect the environment, but they also provide jobs for people with physical and mental disabilities.

In addition, we started making increasing use of digital invoicing with our suppliers in 2020. The project was launched before the COVID-19 pandemic but has been stepped up since then and our customers are also making increasing use of this feature. For example, both we and our suppliers are sending digital invoices in order to save paper and cut the resulting carbon emissions.

NfS: Nonfinancial Key Performance Indicators and Greenhouse Gas Emissions

The following table shows paper consumption at our locations in Germany, which are supplied centrally with paper. The figures can vary from year to year, since in many cases a large amount of paper is ordered and distributed once a year. If, for example, an order is placed for a large amount at the end of a year, the quantity ordered in the following year will decline. What is more, the paper ordered in a particular year is not used up entirely in that same year. The vast majority of copy paper used in the Group has been certified in accordance with the EU Ecolabel, which is used to denote products and services with a lower environmental impact than comparable options

(1) The figures for 2019 and 2020 were adjusted in the 2021 reporting period due to the harmonization of the method used for capturing carbon emissions data. They are reported using the "well-to-wheel" (WTW) method and are based on the information supplied by the service providers.

(2) The Greenhouse Gas Protocol (2011) requires purchased transportation and distribution services for products sold to be assigned to upstream Scope 3 emissions (category 4).

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Paper consumption <sup>(1)</sup>	2019	2020	2021
Total paper consumption in tonnes	3,406.60	2,751.72	2,114.57
Paper consumption per employee <sup>(2)</sup> in kilograms	417.60	363.36	265.12
CO <sub>2</sub> equivalents in tonnes <sup>(3)</sup> (Scope 3)	3,104.70	2,282.28	1,753.83

(1) The figures relate to our companies and locations in Germany, which are supplied centrally with paper. Including Strato and Drillisch, or letterhead and specialty paper.

(2) Arithmetic average; the figures relate to the employees at the companies and locations listed in (1).

(3) Approximate figure calculated on the basis of the conversion factors published by DEFRA for 2018, 2020 and 2021.

## Employee Mobility

### Environmentally Aware Business Travel and Fuel Usage

Our Group is distributed across more than 30 locations in 11 countries, a fact that makes high demands on employee mobility. Carbon emissions are produced when our employees travel.

GRI 302-1

GRI 302-2

GRI 305-1

GRI 305-2

GRI 305-3

We aim to reduce travel-related emissions, both by avoiding business trips and by using climate-neutral options such as rail travel. Corporate Procurement and Human Resources work closely together to manage employee mobility. Responsibility for this topic ranges from business trip management through vehicle fleet monitoring down to defining the terms on which company cars are provided and can be used.

We have taken the following measures to promote eco-friendly mobility:

#### ■ Avoiding business trips

Equipping our meeting rooms with conference call and videoconferencing technology means we can avoid the need for many business trips. In addition, instant messaging services improve internal communications and can help reduce trips between locations even further.

#### ■ Climate. friendly travel

As part of the approvals process, we draw employees' attention to the fact that they should use the train as their preferred means of transportation. This allows climate-neutral travel for long-distance trips. What is more, employees can use the car pool service on our intranet to arrange to travel together. Local rules exist in some areas of the organization, but these are similar to the general Group rules.

#### ■ Vehicle fleet

Our company car rules limit the impact our fleet has on the environment, e.g., by restricting the available engine options. In addition, we track the market constantly to ensure our fleet is always state of the art from both an environmental and an economic perspective. We are also examining the use of alternative technologies, with our goal in all cases being to take economically and environmentally acceptable decisions. Vehicle fleet management is largely performed by United Internet Corporate Services. Additional local rules now only exist in a few cases. What is more, in the reporting period we introduced a cap on carbon emissions of 160 g/km per vehicle as measured by the NEDC for all vehicles acquired as from 2021, and made it possible to purchase electric vehicles.

#### ■ Leasing of company bicycles

The United Internet Group has offered a company bicycle leasing scheme since June 2020. Employees can use the scheme to lease bicycles at a subsidized monthly rate and can actively contribute to protecting the environment and improving the traffic situation by cycling to work, among other things. Employees have reacted positively to the offering.

### ■ Paperless travel expense claims

Starting in 2019, the United Internet Group introduced a workflow for submitting paperless travel expense claims that also offers improved transparency as to alternative means of transportation and travel expenses.

## Fuel Consumption and Carbon Emissions

We work together with external partners on the use of rental and company cars. These partners provide us with regular information on vehicle fleet usage and evaluate fuel cards, enabling us to monitor trends in fuel consumption and associated greenhouse gas and carbon emissions. Air travel is organized by travel agents who also provide us with regular information on carbon emissions, among other things. German rail network operator Deutsche Bahn supplies us with an annual client environmental data report ("Umweltbilanz"). This quantifies the carbon emissions that our employees have avoided by traveling by rail as opposed to by car. In 2021, for example, this amounted to over 143 tonnes of CO<sub>2</sub> (2020: over 280 tonnes; 2019: over 800 tonnes). The substantial year-over-year savings of approximately 140 tonnes of carbon emissions are associated with the slump in overall travel resulting from the COVID-19 pandemic. This can also be seen from the significant difference between 2019 and 2020.

Our employees traveled more than 13.41 million kilometers in the 2021 reporting period (2020: 19.10 million kilometers; 2019: 37.70 million kilometers), generating 2,441.88 tonnes of carbon emissions (2020: 3,580.44 tonnes; 2019: 6,260.43 tonnes). The following tables provide a detailed breakdown of the Group's travel activity.

<b>Rail travel<sup>(1)</sup></b>	2019	2020 <sup>(5)</sup>	2021
Passenger kilometers (pkm) for long-distance travel	6,162,620	1,989,343	842,721
Pkm for long-distance travel per employee <sup>(2)</sup>	794.05	250.89	102.78
CO <sub>2</sub> equivalents from long-distance travel in tonnes (Scope 3)	0.0	0.0	0.0
Pkm for short-distance travel	508,710	176,600	74,223
CO <sub>2</sub> equivalents from local travel in tonnes (Scope 3)	27.61	0.0	0.0
Climate-neutral rail travel in % of total	92.37	100.00	100.00

(1) The figures relate to the United Internet Group in Germany. They are taken from Deutsche Bahn's annual client environmental data report ("Umweltbilanz").

(2) The figures relate to the United Internet Group's employees in Germany; 2019: 7,761; 2020: 7,929; 2021: 8,199.

(3) The decline in the 2020 and 2021 figures is due to the restrictions caused by the COVID-19 pandemic. In addition, Deutsche Bahn introduced 100% green electricity for local trains in fiscal year 2020, making climate-neutral travel possible.

<b>Rental cars<sup>(1)</sup></b>	2019	2020 <sup>(5)</sup>	2021
Fuel consumption (gasoline and diesel) in liters <sup>(2)</sup>	127,652.29	67,706.15	43,545.15
Fuel consumption per employee in liters <sup>(3)</sup>	16.45	8.54	5.31
Total kilometers driven	1,725,031	914,948	588,448
CO <sub>2</sub> equivalents in tonnes <sup>(4)</sup> (Scope 3)	256.78	120.44	79.22

(1) The figures relate to the United Internet Group in Germany.

(2) Calculated on the basis of the average fuel consumption data for passenger cars and station wagons per 100 km provided by the Umweltbundesamt (the Federal Environmental Agency): 7.4 l.

(3) The figures relate to the United Internet Group's employees in Germany; 2019: 7,761; 2020: 7,929; 2021: 8,199.

(4) The figures are based on service provider data.

(5) The decline in the 2020 and 2021 figures is due to the restrictions caused by the COVID-19 pandemic.

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<b>Company cars<sup>(1)</sup></b>	2019	2020 <sup>(5)</sup>	2021 <sup>(5)</sup>
Fuel consumption (gasoline and diesel) in liters	1,434,708.20	998,712.60	834,305.68
Fuel consumption per company car in liters <sup>(2)</sup>	2,029.29	1,305.51	1,106.51
Total kilometers driven <sup>(3)</sup>	21,799,020	15,159,073	11,275,181
Total kilometers driven per company car	30,833.13	19,815.78	14,953.82
CO <sub>2</sub> equivalents in tonnes <sup>(4)</sup> (Scope 1)	3,750.09	3,074.11	2,173.61

(1) The figures relate to the United Internet Group in Germany, 1&1 Versatel, and the 1&1 AG, plus new orders by Strato; additionally, in the case of the 1&1 AG they include long-term rental cars and fuel for rental cars in some cases.

(2) number of vehicles reported as assets as of December 31 of the reporting period in question: 2019: 707; 2020: 765; 2021: 754; the number of cars in the fleet may vary over the course of the year.

(3) The figures are based on manual data input by users when refueling.

(4) The figures are partly based on service provider data and partly calculated using the conversion factors published by DEFRA for 2019, 2020 and 2021.

(5) The decline in the figures in 2020 and 2021 is due to the restrictions caused by the COVID-19 pandemic and to the new Guidelines on Working from Home introduced at the Company.

<b>Air travel<sup>(1)</sup></b>	2019	2020 <sup>(5)</sup>	2021
Kerosene consumed in liters <sup>(2)</sup>	268,548.81	30,582.15	22,293.63
Kerosene consumed per employee in liters <sup>(3)</sup>	35.97	3.99	3.32
Total kilometers flown	7,501,363.52	861,469.14	626,225.60
CO <sub>2</sub> equivalents in tonnes <sup>(4)</sup> (Scope 3)	2,225.95	385.90	189.04

(1) The figures relate to the United Internet Group in Germany, including 1&1 Versatel, Strato, and relevant foreign companies, but not including Drillisch.

(2) Calculated on the basis of the average kerosene consumption data per passenger and 100 km provided by the Bundesverband der deutschen Luftverkehrswirtschaft (German Aviation Association – BDL); 2019: 3.58 l; 2020: 3.55 l; 2021: 3.56 l.

(3) The figures relate to the employees of the companies mentioned under (1).

(4) The figures as based on travel agent data.

(5) The decline in the 2020 and 2021 figures is due to the restrictions caused by the COVID-19 pandemic.

# UNITED INTERNET AS A BUSINESS PARTNER

## Management Approach

### Materiality, Impact, and Risks

NfS: Impact of the Company's Business Activities

GRI 103-1



See the [online version of the NAP](#).

See [1&1 IONOS UK and Fasthosts](#) for our UK companies' slavery and human trafficking statements.



See also "United Internet as an Employer" on page 60ff and "Corporate Digital Responsibility" on page 39ff.

Based in Germany and with business activities in Europe and North America, United Internet has to comply with strict standards in the areas of environmental protection, and labor and human rights. At the same time, expectations are growing that the organization will use these high standards as the basis for its work with its business partners and suppliers. This is required both by frameworks such as the UN SDGs and the GRI Standards and e.g., by the German government in its National Action Plan for the Implementation of the UN Guiding Principles on Business and Human Rights ("NAP")<sup>(1)</sup> and the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG) that was resolved in 2021. Comparable action plans are also under development in other countries, or have already been implemented (e.g., in the form of the UK Modern Slavery Act). Equally, investors and analysts are joining consumers, civil society players, and the media in looking more closely at the issue of value chains.

In principle, the same topics are relevant in our supply and value chain as in our own business – the topics that are included in our sustainability strategy and in this report, such as climate and environmental protection, and human rights. Human rights comprise not only fundamental rights such as the rights to life, freedom, and equality, but also a wide range of aspects from the world of work, such as the prohibition on discrimination and ("modern") slavery, and the right to rest. Also included are rights relating to the internet and the digital arena, such as freedom of opinion and information, and the protection of privacy.

**We aim to create value together with our business partners through strong, fair partnerships.**

As regards business partnerships and supplier relationships, companies in Germany are subject to the same strict statutory requirements as United Internet itself. In addition, telecommunications is largely a regulated market and many suppliers have also introduced voluntary commitments. This means that there is a very low risk of child labor or forced labor, for example, in the domestic links of our value chain. However, such risks can take on a different dimension abroad in view of the legal, political, and social frameworks there. In addition, business partners' specific activities may give rise to other relevant topics, depending on how far up the value chain an examination goes (it may extend as far back as the extraction of raw materials). This means that other stakeholders may be affected indirectly by the way we behave as a business partner. Examples include business partners' employees and those of their suppliers, residents living near production sites, and people or groups affected by potential environmental impacts.

The ability to work together reliably with wholesalers and business partners is crucial for United Internet. For example, collaborating with specialized partners and outsourcers, and sourcing wholesale services are decisive for our business success. Successful partnerships are based firstly on partner screening, but above and beyond that on close cooperation and personal support. Another reason why the integrity of our business partners is essential for us is that negative events could impact United Internet (market and reputational risk). In addition, due diligence requirements in the value chain are currently attracting political attention (see above), which could result in political and legal risks.

<sup>(1)</sup> According to the NAP (page 4), "few countries' economies are so internationally entwined as that of the Federal Republic of Germany."



**UNITED INTERNET AS A  
BUSINESS PARTNER**

**Management Approach**

Supply Chain/Value  
Chain

Cooperation with  
Business Partners

## Goals and Measures

The purpose of the management approach is to create value together with our business partners through strong, fair partnerships. On the one hand, we want to avoid any liability and reputational risks that could arise from business relationships, while on the other we aim to establish the trust needed for long-term partnerships, and to reinforce taking responsibility together.

Relevant guidelines include our Code of Conduct and, in particular, the United Internet Group's Code of Conduct for Business Partners. The latter is a key way of ensuring that partners observe the duties of care that are relevant for compliance, and of reducing compliance risks within the value chain. It builds on our corporate values to define minimum social and environmental standards, and lays down rules on how to comply with them. The Code of Conduct for Business Partners has been incorporated into the contracts entered into with business partners by including it in the General Terms and Conditions for Procurement.

The analysis of our supply chain and value chain has already led to the realization that we source significant volumes of wholesale services for the Consumer Access Segment of the Access Division (1&1) in particular. The areas entrusted with procuring wholesale services such as network services and devices also see themselves as "partner managers." They ensure that the products and services concerned are of a high quality and fit for the future, and manage reliable business relationships on the basis of trust. Carrier Management is responsible for end-to-end management and coordination of the relationships with wholesale telecommunications partners, both for fixed networks and for MBA and national roaming (mobile communications). Partner Account Management Access is responsible for hardware procurement (information and communications technology (ICT) products and devices) for our customers in the case of both fixed networks and mobile accounts. Responsibility lies with the Management Board member for Product Management and the Management Board members at Versatel and 1&1 Mobilfunk. In addition, special areas coordinate network procurement by the Business Access (1&1 Versatel) Segment and the outsourcing of customer care services. The Corporate Procurement unit, which purchases a large number of products and services for the Group, is part of Corporate Finance and reports to United Internet AG's CFO.

NfS: Policies Pursued

GRI 103-2

NfS: Risk Prevention



See "Code of Conduct for Business Partners" on page 102ff.



See "[Code of Conduct for Business Partners](#)."

See our [General Terms and Conditions for Procurement](#) (German only).

## Results and Assessment

We are continuously and successively expanding our mapping of our value chain, especially in light of the need to implement the requirements of the LkSG. As part of this, the whistleblowing systems, reporting channels, and due diligence outsourcing, were also steadily extended.

NfS: Results of Policies Pursued

GRI 103-3

## Contribution to the SDGs



Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.

## Description of Our Supply and Value Chain

GRI 102-9

We are an access and applications provider that supplies private customers and organizations with internet-based applications – both as independent products in the Applications Division and in combination with fixed network and mobile access products in the Access Division. We see it as our role to examine our impact on the environment and society in all links in our value chain.

The following graphic shows a simplified overview of the United Internet Group's supply and value chain:



### Upstream

United Internet sources network services, domains, licenses, and ICT products such as devices and servers from the upstream value chain<sup>(1)</sup>. These wholesale services are in turn partly based on a multistage upstream value chain stretching all the way back to raw materials extraction.

NfS: Nonfinancial Key  
Performance Indicators



See "Code of Conduct for  
Business Partners" on  
page 102ff.

The wholesale services provided for the Access Division – and especially network services (mobile and fixed network) – represent a significant component of total wholesale services, with devices and ICT products for customers and services provided by specialized partners and outsourcers following by some margin. Taken together, these items make up the bulk of our procurement volumes. All in all, we sourced revenue-related services and goods worth approximately €2.99 billion (2020: €3.11 billion; 2019: €2.78 billion) from our business partners in 2021. Sourcing wholesale services places high demands on the business relationships involved.

NfS: Environmental  
Matters/Environmental  
Impact of Our Products  
and Services

The network services and ICT products must mainly be seen from the perspective of their environmental impact, since network operation involves the consumption of substantial amounts of energy and resources. To a lesser extent this also applies to domains, for example, the provision of which also requires energy and the underlying hardware.

<sup>(1)</sup> The upstream value chain comprises cradle-to-gate goods and services (Greenhouse Gas Protocol, 2011).

**UNITED INTERNET AS A BUSINESS PARTNER**

Management Approach

**Supply Chain/Value Chain**

Cooperation with Business Partners

Servers and devices such as smartphones and tablets have environmental impacts that can be relevant; this applies especially with respect to their electronic components, up to and including the extraction of the raw materials concerned. A social perspective is becoming important here, since raw materials in particular are frequently mined in countries in which the standards for working conditions and environmental protection are lower than in Germany, for example. In addition, the issue of conflict minerals must be addressed. The mining of minerals such as tin, tantalum, tungsten, and gold – which are used among other things in smartphones – sometimes involves forced labor or helps finance armed conflicts. We address this risk in our Code of Conduct for Business Partners.

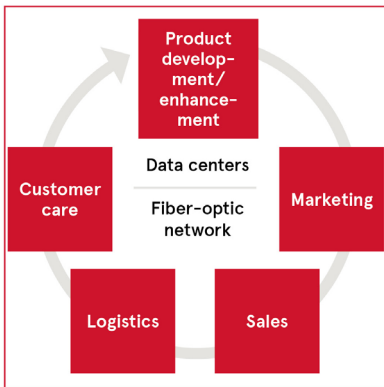
GRI 308-2

GRI 414-2



See "Code of Conduct for Business Partners" on page 102ff.

## Our Value Added



United Internet primarily adds value in the areas of product development and enhancement, marketing, sales, and customer care; in addition, the organization has its own logistics capabilities. Our products and services build on our data center and fiber-optic network operations.

The figure breaks down the red "Our value added" link in the value chain shown earlier in more detail. We add a large proportion of the value we create in Germany or other EU or OECD countries.



See logistics, in "Climate and Environmental Protection" on page 81.

Impacts on the environment and society, such as the energy consumed by our data centers, the impact of transportation and logistics, or our responsibility as an employer, are examined in detail in the various chapters of this sustainability report.

NfS: Environmental Matters/Environmental Impact of Our Products and Services

## Downstream

United Internet also uses service providers in some cases for its sales and customer service operations. Downstream<sup>(1)</sup> activities can be highly relevant, since in many cases the long-term customer relationships resulting from fee-based subscriptions (roughly 26 million) and ad-financed free accounts (roughly 40 million) can facilitate growth. This means that the use phase for our products is a material part of our business – including from a sustainability perspective. Other business partners in the downstream value chain are shipping partners, who are responsible for delivering devices to customers, and partners who ensure that waste devices are recycled/disposed of in an environmentally friendly manner.

<sup>(1)</sup> Downstream activities cover goods and services following their sale/distribution by the reporting enterprise and the transfer of control to another unit or organization.



See "Measures and Tools Relating to Call Center Service Providers" on page 103.

See "Customer Hardware" on page 88f., "Hardware in Data Centers and Office Buildings" on page 90f., and "Emissions from Shipping Distances" on page 92f.

Services that we commission from specialized partners and outsourcers include parts of our customer service and sales operations, and product shipping to customers. Social impacts in the form of data privacy, data security, and working conditions must be taken into account here, and we expect our service providers to comply with strict requirements in these areas.

Equally, environmental topics are relevant. Deliveries by our service providers use fuel and emit greenhouse gases. In addition, recycling or disposing of retired devices and IT equipment in an environmentally friendly manner is a relevant environmental factor, which is why we work with specialized partners in this area.

## Cooperation with Our Business Partners

GRI 308-1

GRI 414-1

We aim to ensure our business partners also take responsibility and make this the basis of our cooperation, so as to be able to build reliable, long-term relationships and assume responsibility together. In addition to our existing close cooperation and personal contacts with our business partners, especially in the wholesale area, the contracts we have agreed with major suppliers of smartphones and other ICT devices in particular specify that ethical principles and working standards must be observed. Partner Management is in close contact with our major wholesalers here.

## Responsibility for Human Rights Due Diligence

GRI 414

GRI 414-2

The National Action Plan for Business and Human Rights (NAP) and Germany's LkSG expect large enterprises to take responsibility throughout their value chain, to perform a risk analysis, and then on this basis to introduce an appropriate corporate due diligence process to ensure respect for human rights. The five core elements of the NAP are:

- A human rights **policy statement** (a public commitment plus formulation of the expectations to be met by employees and business partners)
- **Procedures for identifying** actual or potential adverse impacts on human rights (relating to the organization's own activities, supply chains, business relationships, etc.)
- Measures to **ward off** potential adverse impacts and to review the **effectiveness** of these measures
- **Reporting** (on the approach to due diligence and the effectiveness of the measures taken)
- A **grievance mechanism** (provision of and participation in appropriate channels for making complaints, so as to give affected individuals access to remedies)

The requirements of the new LkSG will enter into force on January 1, 2023. United Internet has already taken measures to prepare for the new human rights due diligence requirements this will bring. Among other things, these include process-driven preventive measures in its own operations and the implementation of a grievance procedure. In the following year, United Internet will compare the new due diligence requirements with the measures it has already implemented, identify any new action areas that may be required, and introduce any necessary new measures.

**UNITED INTERNET AS A  
BUSINESS PARTNER**

Management Approach

Supply Chain/Value  
Chain

**Cooperation with  
Business Partners**

## Policy Statement

For United Internet, respect for human rights is an integral component of its corporate culture. The Company has committed itself to observing the United Nations' Universal Declaration on Human Rights. It has taken measures to prevent, mitigate, and redress any potential adverse human rights impacts. In this context, United Internet bases its activities on the UN Guiding Principles on Business and Human Rights. We have included principles designed to ensure respect for human rights in our corporate values and our Code of Conduct.

NfS: Respect for Human Rights



[See the United Nations.](#)



See the [UN Guiding Principles.](#)

NfS: Instruments Against Corruption and Bribery

## Procedures for Identifying Adverse Impacts, and Grievance Mechanism

We have established confidential reporting channels to enable adverse impacts to be identified at an early stage. By appointing compliance managers and designated persons of trust, the organization has created confidential points of contact for employees outside their immediate working environments. These personal reporting channels are supplemented by IntegrityLine, the new electronic whistleblowing system that was introduced in 2021 and that enables whistleblowers to remain anonymous if desired. The goal of these grievance mechanisms is to become aware of any human rights complaints at an early stage and to get to the bottom of all complaints regarding human rights violations. There were no indications in fiscal year 2021 of any violations suggesting actually or potentially adverse human rights impacts.

As regards our business partners, we consider appropriate working conditions – from the remuneration paid through working times down to occupational safety – to be a key relevant topic. In light of these issues and other topics affecting the supply and value chain, United Internet has introduced a Code of Conduct for Business Partners that formulates the expectations it has of business partners regarding human rights topics, among other things.

## Measures to Ward off Adverse Impacts, Effectiveness Reviews, and Reporting

The risk of human rights violations within the United Internet Group is very small: As of the 2021 year-end, United Internet employed 8,199 (2020: 7,929; 2019: 7,761) members of staff in Germany. No human rights risks were established for these employees. In addition, United Internet employed 1,776 (2020; 1,709; 2019: 1,613) members of staff outside Germany, mostly in the EU or in OECD countries with strict labor law standards; no human rights risks were established for these employees either.

NfS: Risk Identification and Assessment



See "United Internet as an Employer" on page 60 **Fehler! Textmarke nicht definiert.** for further information on fair pay in the Philippines.

Formal reporting on human rights due diligence is mainly performed in connection with the sustainability report. This external communication is flanked by our readiness to enter into an open dialog with customers, interested stakeholders, and (potentially) affected individuals, and to provide information if requested.

## Code of Conduct for Business Partners

GRI 308

GRI 414



See [Code of Conduct for Business Partners](#).

Our Code of Conduct for Business Partners builds on our corporate values to define minimum social and environmental standards in the areas of business integrity and compliance, human rights and labor rights, health and safety, and the environment. The Code specifies how the requirements are to be met and provides information on suitable channels for reporting any indications of problems. For example, United Internet provides employees at our business partners who want to notify it of potential violations of the law or of the Code of Conduct for Business Partners with a confidential reporting channel. At the same time, its business partners must ensure that employees are aware of this confidential reporting channel and that they can use it without any fear of reprisals.

### Business Integrity and Compliance

NfS: Anti-corruption and Bribery Matters

The Code of Conduct for Business Partners requires business partners to take appropriate measures to comply with all applicable laws, regulations, and requirements (compliance). No undue benefits may be requested or offered; anti-corruption laws and regulations, and competition law and antitrust regulations must be observed; and sanctions and embargoes that have been imposed must be complied with (fair competition). In addition, suitable technical and organizational measures must be taken to protect the confidentiality, availability, and integrity of all information transmitted by United Internet, and in particular of sensitive corporate data and personal data (information security and data privacy).

### Human Rights and Labor Rights

NfS: Respect for Human Rights and Implementation of Fundamental ILO Conventions

With respect to human rights, the Code of Conduct for Business Partners is based on the UN Guiding Principles on Business and Human Rights. The Code stipulates that appropriate measures must be taken to prevent, mitigate and, if necessary, redress adverse human rights impacts, and that it also expects business partners to do this.

GRI 408

GRI 408-1

GRI 409

GRI 409-1

GRI 414-2

See the [ILO Conventions and Recommendations](#).

In concrete terms, the Code of Conduct for Business Partners contains requirements to comply with the rules governing working times, wages, and social security benefits (wages and working times). In addition, business partners may not use any form of forced, prison, slave, or compulsory labor, and the use of conflict minerals must be examined and prevented, especially during the procurement and manufacture of goods (voluntary labor). Business partners may not employ children under the minimum age specified by the International Labour Organization (ILO) or national legislation (no child labor). Above and beyond this, business partners must ensure working environments are free from psychological, physical, sexual, or verbal abuse, intimidation, threats, or harassment, and must undertake to ensure equal opportunities in their human resources decisions. Discrimination on the basis of nationality and national origin, ethnicity, political affiliation, gender, religion or belief, disability, age, or sexual identity is prohibited (prohibition on discrimination).

### Health and Safety

NfS: Occupational Health and Safety

Business partners must ensure safe, healthy working environments in order to prevent accidents and sickness. Among other things, this includes holding regular training courses and providing suitable protective clothing.

### Environment

NfS: Environmental Matters / Supplier Environmental Assessment

GRI 308-1

Business partners undertake to comply with all applicable environmental legislation and to ensure the conservation of natural resources. Business partners whose activities have significant ecological impacts on the environment should have effective environmental management policies in place to reduce the adverse impacts of their products and services on the environment.

**UNITED INTERNET AS A  
BUSINESS PARTNER**

Management Approach

Supply Chain/Value  
Chain**Cooperation with  
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## Implementation

The Code of Conduct for Business Partners has been incorporated into the contracts entered into with business partners by including it in our General Terms and Conditions for Procurement.

GRI 414-1



See our [General Terms and Conditions for Procurement](#) (German only).

## Measures and Tools Relating to Call Center Service Providers

The establishment of reporting channels has ensured that external call center staff can draw attention to any cases of fraud of which they have become aware in the course of their support and sales activities. United Internet performs a systematic review of the outsourcing service providers with which it interfaces (due diligence outsourcing or DDO). This due diligence is built around self-reporting by the service provider using lists of questions on specific topics, plus a subsequent analysis and assessment by United Internet. The standardized review focuses on the organizational, financial, and legal position of the outsourcing service providers with whom contracts have been signed. This allows information about compliance and the internal control system (ICS), among other things, to be captured. Since 2019, the review includes all segments with outsourcing activities, and is performed in close cooperation with the departments performing the outsourcing (in addition to Consumer Access<sup>(1)</sup> these are Consumer Applications and Business Applications). We have established binding rules to prevent fraud in the support and sales functions at our outsourcing service providers and have agreed them with our partners. We have implemented an internal control function to review conspicuous behavior by both external and internal call center employees. The results are documented in a review report and addressed, in the form of concrete recommendations for measures, to Compliance, Legal, and the management of the operating segments responsible for implementing the measures, among other instances. In fiscal year 2021, a total of 10 outsourcing service providers were reviewed. This means that, five years after the DDO process was introduced, a large proportion of the call centers with which interfaces exist have now been reviewed. There were no material indications of adverse impacts in relation to the social aspects of working practices, human rights, and compliance.

NfS: Due Diligence  
Processes Applied

Six members of staff have been trained as auditors for our strict data protection requirements so as to ensure that regular reviews of these areas can also be performed at the call center service providers that 1&1 uses. Going forward, regular on-site audits of these service providers will be performed in addition to the abovementioned DDO reviews. No on-site audits could be performed in 2021 due to the pandemic. As soon as this becomes possible again, at least one regular audit per year and service provider is planned. The idea is to alternate full audits performed by two auditors with focused checklist audits across a two-year cycle. The latter should be performed unannounced if possible, or at most at short notice.

(1) To date, this comprises 1&1 Telecommunication SE and its subsidiaries. The entire 1&1 Group already performs a thorough review of its service providers.

# OUR SOCIAL COMMITMENT

## Management Approach

### Materiality, Impact, and Risks

NfS: Social Matters

As an internet supplier, we operate in a dynamic and highly competitive market. However, our economic activities aren't the whole story: We are also part of society and we can only be successful if this functions properly, too. This explains why we are committed to helping ensure a stable society that can meet future challenges.

GRI 103-1

We are part of society and are committed to helping ensure its stability and ability to meet future challenges.

Our products are targeted at a broad range of people in society and help them connect with each other. In line with this, we take social responsibility within our Company. In addition, we want to ensure this happens throughout the value chain. As a result, we expect our business partners to show responsibility for society and their stakeholder groups.

For many stakeholders, initiatives and projects focusing on the bigger picture beyond our day-to-day business are extremely important. For example, it is becoming more common for potential customers to select suppliers and products on the basis of the companies' social and environmental commitment. Staff also increasingly want to be able to identify with their employer – something that is easier, among other things, if the latter shows social commitment and supports its employees in performing voluntary work.

### Goals and Measures

NfS: Policies Pursued

We take good corporate governance to mean that we should not lose sight of how our various business activities impact people and the environment, and that we should help ensure a stable and forward-looking society. Our goal is to contribute to people's prosperity both within and outside our corporate environment. We do this by creating jobs and traineeships, through our products, and through our social commitment. Our activities here comprise the following initiatives:

GRI 103-2

NfS: Social Matters: Ensuring the Protection and Development of Local Communities

#### ■ United Internet for UNICEF

Back in 2006, foundation donor and United Internet CEO Ralph Dommermuth laid the groundwork for an initiative designed to help children throughout the world. The United Internet for UNICEF foundation, which has been highly successful in the years since then, supports projects run by UNICEF (the United Nations Children's Fund) worldwide. By doing so, it helps improve equal opportunities for, and the well-being of, children around the world.

NfS: Employee Matters/Diversity and Equal Opportunities

#### ■ Supporting inclusion

As already described in the chapter entitled "Climate and Environmental Protection," we also support the inclusion of, and employment opportunities for, people with physical or mental disabilities. Among other things, we do this by passing on waste equipment to AfB gGmbH, a recycling specialist. According to AfB, 45% of its workforce are people with disabilities. Another way in which we promote working together with people with physical or mental disabilities is our partnership with disabled people's cooperative GDW (Genossenschaft der Werkstätten für behinderte Menschen Mitte eG), which has shredded and recycled our old files and records for more than four years now.



See also "Climate and Environmental Protection" on page 81ff.



**OUR SOCIAL COMMITMENT****Management Approach**United Internet for  
UNICEF

### ■ Employee volunteering

The catastrophic floods that hit Germany's Ahr Valley in fiscal year 2021 cost many people their lives. The infrastructure was also completely wiped out, with 150,000 mobile and roughly 14,000 fixed network customers being temporarily unable to use any communications services. A special task force was formed to coordinate dealing with the consequences of the storms, allowing phone and internet services to be successively restored to a large majority of affected customers. A complete new fiber-optic infrastructure will be installed in the coming months in those areas that were completely destroyed. In the meantime, the affected customers have been provided with temporary mobile solutions. The organizations and public agencies involved in the general rebuilding operations have established supply depots. Staff from 1&1 Versatel and 1&1 established a powerful telecommunications infrastructure complete with WLAN links for two distribution centers, working partly during their time off to do so.

NfS: Ensuring the  
Protection and  
Development of Local  
Communities

## Results and Assessment

The success of our social commitment can be measured in a number of different ways. We are seeing an increase in donations received and in the number of sponsor members for the United Internet for UNICEF foundation. We are also receiving feedback from our long-term partnerships with AfB and GDW that shows the cooperation is working well. These partnerships allow us not only to live our social commitment but also to help the environment.

NfS: Results of Policies  
Pursued

GRI 103-3

## Contribution to the SDGs

 <p><b>1</b> NO POVERTY</p>	<p>End poverty in all its forms everywhere.</p>	 <p><b>8</b> DECENT WORK AND ECONOMIC GROWTH</p>	<p>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.</p>
 <p><b>2</b> ZERO HUNGER</p>	<p>End hunger, achieve food security and improved nutrition and promote sustainable agriculture.</p>	 <p><b>10</b> REDUCED INEQUALITIES</p>	<p>Reduce inequality within and among countries.</p>
 <p><b>3</b> GOOD HEALTH AND WELL-BEING</p>	<p>Ensure healthy lives and promote well-being for all at all ages.</p>	 <p><b>11</b> SUSTAINABLE CITIES AND COMMUNITIES</p>	<p>Make cities and human settlements inclusive, safe, resilient and sustainable.</p>
 <p><b>4</b> QUALITY EDUCATION</p>	<p>Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.</p>	 <p><b>16</b> PEACE, JUSTICE AND STRONG INSTITUTIONS</p>	<p>Promote peaceful and inclusive societies for sustainable development.</p>
 <p><b>5</b> GENDER EQUALITY</p>	<p>Achieve gender equality and empower all women and girls.</p>	 <p><b>17</b> PARTNERSHIPS FOR THE GOALS</p>	<p>Strengthen the means of implementation and revitalize the global partnership for sustainable development.</p>
 <p><b>6</b> CLEAN WATER AND SANITATION</p>	<p>Ensure availability and sustainable management of water and sanitation for all.</p>		

## United Internet for UNICEF

### Sustained Focus on Helping Children in Need

GRI 102-12  
GRI 203

Our United Internet for UNICEF foundation has been at the heart of our corporate social responsibility (CSR) activities for 15 years. In UNICEF – the United Nations Children's Fund – we have a globally recognized, experienced, and qualified partner. This organization's professional approach allows us to help children in need more effectively.

Among other things, UNICEF supports projects that enhance educational opportunities, health, and child protection, improving children's living conditions worldwide. In addition, it provides humanitarian aid for natural disasters and their protracted long-term consequences.

Our foundation helps raise donations and acquire sustaining sponsors by running appeals for donations on our online platforms. The high level of traffic on our GMX, WEB.DE, and 1&1 portals increases the reach and awareness of these appeals. This broad coverage makes us UNICEF's largest German corporate partner.

The United Internet Group employs a permanent staff member to coordinate the foundation's activities with the assistance of volunteer colleagues. This staff member works closely together with the foundation's chair, Tessa Page, with the other members of the foundation board, and with UNICEF. The foundation's performance is monitored via the regular reports submitted to the Management Board.

## How We Help Raise Donations

Once the foundation has decided to launch an appeal for donations to help with current crises or catastrophes, we deploy a variety of instruments to support this goal.

- An interdisciplinary team of editorial, graphic design, and marketing staff comes together to develop appeal mailshots and a range of news formats. The different team members pool their specialist knowledge and skills to draft informative, compelling e-mails and prepare their dispatch. Our ability to send mailshots via our GMX, WEB.DE, and 1&1 online portals, and to IONOS customers allows our appeals to quickly reach well over 30 million people and call on them to donate.
- In addition, we provide free editorial and advertising space on our online portals for donation appeals. Once again, this allows us to react quickly in urgent cases and provide assistance at short notice.
- United Internet also pledges additional financial support for selected donation appeals and for attracting sustaining sponsors: The Company's "Double It" campaigns match donations by private individuals up to a set limit. Thanks to this additional incentive, among other things, the foundation was able to recruit roughly 578 new sustaining sponsors for UNICEF as a result of its 2021 Christmas mailshot alone (2020: 1,600; 2019: 1,000).

The single and regular donations raised via United Internet's portals are passed on in full to UNICEF because all foundation staff are either volunteers or are not paid from the donations made to United Internet for UNICEF.



"Our foundation has been helping children in need around the world for 15 years. Once again, the generous support from our donors in our anniversary year allowed us to help a large number of girls and boys in countries such as Haiti, Afghanistan, India, and – a first – Germany, following the catastrophic flooding there. I am consistently delighted by the dedication shown to the foundation by my colleagues on the team and in particular by how they have made our appeal mailshots such an effective instrument. Their hard work reminds me of my visit to the Congo, where a headmaster thanked us warmly as we were leaving by saying 'Something good is never lost'."

**Susanne Stocker**, Senior Online Editor "United Internet for UNICEF."

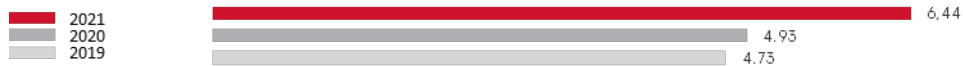
## Fifteen Years of Unwavering Commitment to Children

NfS: Nonfinancial Key  
Performance Indicators

The foundation's appeals in fiscal year 2021 resulted in further donations to UNICEF of approximately €6.44 million (2020: €4.93 million; 2019: €4.73 million). This brings the total amount raised since the foundation was set up in 2006 to over €59.14 million.

GRI 203-2

### Total donations per year in € million



2021 was a very special year for the foundation in lots of ways. Firstly, we celebrated our 15th anniversary – an occasion for great pleasure and gratitude. Thanks to our donor community, we were able to help innumerable children in need and in crisis situations.

NfS: Dialog with Local  
Communities or at  
Regional Level

That having been said, though, our anniversary year also brought many challenges and crises: The world is still in the grip of the COVID-19 pandemic, while the catastrophic floods in Germany were a real shock and a further natural disaster in Haiti caused massive suffering. In addition to the devastating humanitarian situation in Yemen, events in Afghanistan demanded a response from us. That is why we dedicated our St. Nicholas' Day and Christmas appeal to the acute emergency in the country, raising €384,000 to support UNICEF's work on the ground.

NfS: Dialog with Local  
Communities or at  
Regional Level

The human suffering caused by the catastrophic flooding in Germany's Ahr Valley in July was immense – this was the worst natural disaster in Germany for nearly 60 years. As a result, the foundation issued an appeal mailshot for victims in Germany for the first time in its history. Donations of more than €1.1 million were raised for the "Aktionsbündnis Katastrophenhilfe", an alliance whose members – Caritas International, the German Red Cross, and Diakonie Katastrophenhilfe – provided valuable support in the affected areas.

NfS: Dialog with Local  
Communities or at  
Regional Level

Ever since the outbreak of the COVID-19 pandemic, we and our many supporters have made a major contribution to bolstering UNICEF's work and alleviating the dramatic consequences that the pandemic has had on children and their families. For example, donations of €1.2 million went to India and of €1.0 million to Venezuela. The support provided by the foundation during the second wave of coronavirus infections in India at the start of 2021 helped boost oxygen supplies to clinics, expanded testing and screening capabilities, and also bolstered UNICEF's nutrition, sanitary facilities, and child protection programs. In Venezuela, the foundation's support enabled UNICEF to maintain access to schooling in remote areas in particular. In addition, the foundation helped ensure healthcare for pregnant women and young children and provide people on the ground with clean drinking water and hygiene products.

## Interview with Tessa Page on the Foundation's 15th Anniversary



Tessa Page co-founded United Internet for UNICEF together with Ralph Dommermuth and is the foundation's chair. The following short interview gives a glimpse of the foundation's history, its highlights over the past 15 years, and future challenges.

**Fifteen years, more than 15,000 active sustaining UNICEF members, and almost €60 million raised in donations – looking back, United Internet for UNICEF can be proud of what it has achieved- Did you think when you founded it that this partnership with the United Nations Children's Fund would be as successful as it has turned out to be?**

The reason why our partnership with UNICEF has been so successful is that we have had the same goals right from the start. For us – and I mean United Internet AG here – UNICEF Germany has been a strong partner for implementing our vision of protecting children's rights. That is why we took the decision 15 years ago to work together with UNICEF.

**Let's go back even further: How did the foundation come to be formed? Was there a particular event that triggered it off?**

Ralf Dommermuth and I founded United Internet for UNICEF because we are convinced that children are the world's future. We have a duty to understand that ensuring children have a healthy, safe environment to grow up in is a global task. We wanted to put this philosophy into practice and to bolster children's rights around the world. By doing so, Ralf Dommermuth was also propelling United Internet AG strongly into the age of social responsibility in Germany.

**Getting from the initial idea to almost €60 million must have been hard work: What challenges did the foundation have to overcome at the beginning?**

Challenges are something positive – they help organizations to grow. Of course we regularly faced difficulties that we had to overcome, and had to make decisions that helped the foundation grow and continue its success. The foundation has a marvelous team that works unflinchingly to implement our vision.

**From Yemen and the Democratic Republic of the Congo down to the Philippines, South Sudan, and Nepal – the foundation has helped thousands of children in need and supported dozens of projects all around the world- What project or emergency do you remember best or moved you the most?**

One thing that moves me even today is an in-depth discussion that I had with three former child soldiers in the Democratic Republic of the Congo. The look in those children's eyes was heart-breaking. They had experienced horrible situations and had themselves been forced to do unspeakable things. UNICEF and its partners in the country are doing an unbelievable job of giving these children their childhood back.

**What are the most important tasks facing the foundation in the coming years?**

We shall continue making every effort to secure long-term social improvements in the lives of needy children. These include not only education, healthcare, nutrition, and freedom from violence and abuse, but also protecting the right to a healthy climate. We take this issue extremely seriously and are addressing it in our work.

Early investments in child health, education, and development bring major benefits throughout children's lives, and for their descendants and society as a whole. Successful countries invest in their children and protect their rights. This can clearly be seen from those countries with a strong track record in the areas of healthcare and economic measures in recent decades.

Nevertheless, many politicians in less-developed countries do not prioritize investments in children and also do not see them as the linchpin for more far-reaching social improvements. What is more, many children are going hungry or living in absolute poverty even in wealthy countries.

**What are your hopes for the world's children? What would you say are the biggest challenges facing future generations?**

I think that young people today are more optimistic and stronger than ever before. Their commitment to protecting the climate – something that also applies in the Arab world and in Asia, for example – is wonderful. As is the fact that they are promoting digital skills among young people in less-developed countries and regions, up to and including establishing a global youth network for sexual and reproductive rights. They are also aware of the need for responsible consumption and production, and for respect for their fellow humans and the environment. Young people are stepping up to the plate in all the areas where previous generations have failed. I think that's fantastic. They have the potential to change the world for the better. And we have to do everything that we can to help them.

## ANNEX

### GRI Content Index and CSR-RUG Disclosures (I)

The GRI Content Index maps all GRI disclosures made to the relevant sections of this report. This report has been prepared in accordance with the GRI Standards: Core option. All GRI disclosures relate to the 2016 GRI Standards with the exception of GRI 403, which relates to 2018. The topic-specific disclosures in part (II) of the table have been assigned to the aspects in the German CSR Directive Implementation Act (CSR-Richtlinie-Umsetzungsgesetz – CSR-RUG).

GRI 102-54

GRI 102-55

#### GRI 102: General Disclosures

GRI Standard number	GRI Standard title	Reference to relevant sections of the report / other sources, comments	Page number
<b>ORGANIZATIONAL PROFILE</b>			
GRI 102-1	Name of the organization	Company Profile	7
GRI 102-2	Activities, brands, products, and services	Company Profile	7
GRI 102-3	Location of headquarters	Publication Details	125
GRI 102-4	Location of operations	Company Profile	7 ff.
GRI 102-5	Ownership and legal form	AR: Business Development	
GRI 102-6	Markets served	Company Profile; AR: United Internet at a Glance; Business Development; General Economic and Sector Conditions; Opportunity Report	7 ff.
GRI 102-7	Scale of the organization	Company Profile; Our Human Resources Strategy and HR Organization	7 ff. 62 ff.
GRI 102-8	Information on employees and other workers	Our Human Resources Strategy and HR Organization; Gender Equality	62 ff. 72 ff.
GRI 102-9	Supply chain	Description of Our Supply and Value Chain;	98
GRI 102-10	Significant changes to the organization and its supply chain	Company Profile; AR: Business Model; Business Development	7 ff.
GRI 102-11	Precautionary Principle or approach	Risk Management; Compliance and Anti-corruption; AR: Declaration on Company Management /Corporate Governance Report; Risk, Opportunity and Forecast Report	12 13 ff.
GRI 102-12	External initiatives	Stakeholder Dialog; Corporate Digital Responsibility (Gaia-X); Association Work and Cooperative Ventures; United Internet as an Employer (Top Employers Institute; Fair Company Initiative; Diversity Days); Recruiting and Retaining Young Talent; Hardware in Data Centers and Office Buildings United Internet for UNICEF	21 f. 53 57 f. 65 ff. 69 90 f. 106 ff.
GRI 102-13	Membership of associations	Stakeholder Dialog; Association Work and Cooperative Ventures	22 f. 57 f.

<b>STRATEGY</b>			
GRI 102-14	Statement from senior decision-maker	Foreword by Martin Mildner	4 f.
<b>ETHICS AND INTEGRITY</b>			
GRI 102-16	Values, principles, standards, and norms of behavior	The Basis for Acting Responsibly; Our Values and Guidelines; Compliance and Anti-Corruption; Our Values and Corporate Culture	11 f. 12 13 ff. 62 ff.
<b>GOVERNANCE</b>			
GRI 102-18	Governance structure	The Basis for Acting Responsibly; AR: Declaration on Company Management /Corporate Governance Report;	11 f.
GRI 102-20	Executive-level responsibility for economic, environmental, and social topics	Sustainability Management	21
<b>STAKEHOLDER ENGAGEMENT</b>			
GRI 102-40	List of stakeholder groups	Stakeholder Dialog; Influence on the Assessments and Decisions of Stakeholders	21 f. 121 ff.
GRI 102-41	Collective bargaining agreements	Fair Pay	64
GRI 102-42	Identifying and selecting stakeholders	Stakeholder Dialog; Influence on the Assessments and Decisions of Stakeholders	21 f. 121 ff.
GRI 102-43	Approach to stakeholder engagement	Stakeholder Dialog; Influence on the Assessments and Decisions of Stakeholders	21 f. 121 ff.
GRI 102-44	Key topics and concerns raised	Definition of Materiality: Topics and Action Areas; Stakeholder Dialog; Process Used to Define Material Topics	16 f. 21 f. 122 ff.
<b>REPORTING PRACTICE</b>			
GRI 102-45	Entities included in the consolidated financial statements	Our Vision; About this Report: Reporting Period, Reporting Cycle, and Scope of Application AR: Business Development; Notes to the Consolidated Financial Statements	7 124 ff.
GRI 102-46	Defining report content and topic Boundaries	Definition of Materiality: Topics and Action Areas; Report Structure, Methodology, and Frameworks Process Used to Define Material Topics	16 f. 119 ff.
GRI 102-47	List of material topics	Materiality Analysis: Topics and Action Areas	16 f.
GRI 102-48	Restatements of information	New Developments; In addition, new representations are marked at the respective places.	15
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GRI 102-56	External assurance	About this Report: Preparation, Publication, and Examination of the Sustainability Report	124



## GRI Content Index and CSR-RUG Disclosures (II)

Topic-specific Standards 2016 (GRI 200 – Economic, GRI 300 – Environmental, GRI 400 – Social) and Management Approach (GRI 103)<sup>(1)</sup> and 2018 (GRI 403).

GRI Standard number	GRI Standard title	Reference to relevant sections of the report / other sources, comments	Page number
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<b>GRI 203</b>	<b>Indirect Economic Impacts</b>		
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GRI 203-2	Significant indirect economic impacts	United Internet for UNICEF	108 ff.
<b>ANTI-CORRUPTION AND BRIBERY</b>			
<b>GRI 103</b>	<b>Management Approach</b>	<b>COMPLIANCE AND ANTI-CORRUPTION</b>	<b>13 ff.</b>
<b>GRI 205</b>	<b>Anti-corruption</b>		
GRI 205-2	Communication and training about anti-corruption policies and procedures	Compliance and Anti-Corruption	13 ff.
GRI 205-3	Confirmed incidents of corruption and actions taken	Compliance and Anti-Corruption	13 ff.
<b>ENVIRONMENTAL MATTERS</b>			
<b>GRI 103</b>	<b>Management Approach</b>	<b>CLIMATE AND ENVIRONMENTAL PROTECTION</b>	<b>81 ff.</b>
<b>GRI 201</b>	<b>Economic performance</b>		
GRI 201-2	Financial implications and other risks and opportunities due to climate change	Climate and Environmental Protection	81 ff.
<b>GRI 301</b>	<b>Materials</b>		
GRI 301-1	Materials used by weight or volume	Material Consumption and Logistics; Hardware in Data Centers and Office Buildings; Materials Used for Shipments; Paper Consumption	88 ff. 90 91 92 f.
<b>GRI 302</b>	<b>Energy</b>		
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GRI 302-2	Energy consumption outside of the organization	Energy Consumption; Emissions from Shipping Distances; Employee Mobility	83 ff. 92 93 ff.
GRI 302-3	Energy intensity	Energy consumption	83 ff.
GRI 302-4	Reduction of energy consumption	Energy consumption	83 ff.
<b>GRI 305</b>	<b>Emissions</b>		
GRI 305-1	Direct (Scope 1) GHG emissions	Energy Consumption; Employee Mobility	83 ff. 93 ff.
GRI 305-2	Energy indirect (Scope 2) GHG emissions	Energy Consumption; Employee Mobility	83 ff. 93 ff.
GRI 305-3	Other indirect (Scope 3) GHG emissions	Energy Consumption; Hardware in Data Centers and Office Buildings; Materials Used for Shipments Emissions from Shipping Distances; Paper Consumption; Employee Mobility	83 ff. 90 91 92 92 f. 93 ff.

<b>GRI 308</b>	<b>Supplier Environmental Assessment</b>	<b>UNITED INTERNET AS A BUSINESS PARTNER</b>	<b>96 ff.</b>
GRI 308-1	New suppliers that were screened using environmental criteria	Cooperation with Our Business Partners; Code of Conduct for Business Partners: Environment	100 ff. 102
GRI 308-2	Negative environmental impacts in the supply chain and actions taken	Description of Our Supply and Value Chain	99 ff.
<b>EMPLOYEE MATTERS</b>			
<b>GRI 103</b>	<b>Management Approach</b>	<b>UNITED INTERNET AS AN EMPLOYER</b>	<b>60 ff.</b>
<b>GRI 401</b>	<b>Employment</b>		
GRI 401-1	New employee hires and employee turnover	Our Human Resources Strategy and HR Organization; Gender Equality	62 ff. 72 ff.
<b>GRI 403</b>	<b>Occupational Health and Safety</b>	<b>Occupational Health and Safety;</b>	<b>76 ff.</b>
GRI 403-1	Occupational health and safety management system	Occupational Health Management	77 ff.
GRI 403-2	Hazard identification, risk assessment, and incident investigation	Occupational Health and Safety Employee Absences in Figures	77 ff. 80 ff.
GRI 403-3	Occupational health services	Occupational Health Management	77 ff.
GRI 403-4	Worker participation, consultation, and communication on occupational health and safety	Occupational Health Management	78 f.
GRI 403-5	Worker training on occupational health and safety	Occupational Health and Safety, Including Data Center Safety	79 f.
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<b>GRI 404</b>	<b>Training and Education</b>	<b>Training and Education Development and Prospects</b>	<b>65 ff. 65 ff.</b>
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GRI 404-2	Programs for upgrading employee skills and transition assistance programs	Development and Prospects Personal Development Opportunities	65 ff. 66 ff.
GRI 404-3	Percentage of employees receiving regular performance and career development reviews	Development and Prospects	65 ff.
<b>GRI 405</b>	<b>Diversity and Equal Opportunity</b>		<b>70 ff.</b>
GRI 405-1	Diversity of governance bodies and employees	Diversity of the Management Board and Supervisory Board; Diversity and Equal Opportunities	11 70 ff.
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GRI 406-1	Incidents of discrimination and corrective actions taken	Overarching Measures	71 ff.

<b>RESPECT FOR HUMAN RIGHTS</b>			
<b>GRI 103</b>	<b>Management Approach</b>	<b>COMPLIANCE AND ANTI-CORRUPTION UNITED INTERNET AS A BUSINESS PARTNER</b>	<b>13 ff. 96 ff.</b>
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<b>GRI 409</b>	<b>Forced or compulsory labor</b>		
GRI 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Code of Conduct for Business Partners: Human Rights and Labor Rights	102
<b>GRI 414</b>	<b>Supplier Social Assessment</b>		
GRI 414-1	New suppliers that were screened using social criteria	Cooperation with Our Business Partners; Code of Conduct for Business Partners: Implementation	100 ff. 103
GRI 414-2	Negative social impacts in the supply chain and actions taken	Description of Our Supply and Value Chain; Responsibility for Human Rights Due Diligence; Code of Conduct for Business Partners: Human Rights and Labor Rights	99 ff. 100 f. 102 f.
<b>CUSTOMER MATTERS</b>			
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<b>GRI 416</b>	<b>Customer health and safety</b>		
GRI 416-1	Assessment of the health and safety impacts of product and service categories	Product Responsibility	37 f.
<b>GRI 417</b>	<b>Marketing and Labeling</b>		
GRI 417-1	Requirements for product and service information and labeling	Managing and Measuring Customer Satisfaction; Responsibility for Youth Protection; Information Protection Measures; Product Security; Material Consumption and Logistics, particularly Customer Hardware	35 38 45 ff. 48 ff. 88 ff.
<b>GRI 418</b>	<b>Customer Privacy</b>	<b>Data Privacy</b>	<b>41</b>
GRI 418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Ensuring Data Privacy at United Internet	43

(1) The description of the management approaches in accordance with GRI 103 covers GRI Standards 103-1, 103-2, and 103-3. In addition to the GRI requirements, the description of the management approaches complies with the statutory requirements for the presentation of the policies pursued in relation to the non-financial aspects.

## Information about CSR-RUG requirements

Nonfinancial statement (NfS) requirements pursuant to section 289c of the HGB		Material topics	Chapter/section	Page number
<b>DESCRIPTION OF THE BUSINESS MODEL</b>				
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<b>ENVIRONMENTAL MATTERS</b>				
	Supplier environmental assessment			
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NfS: Environmental Matters	Environmental impact of our products and services	United Internet as a Business Partner	Protection	102
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NfS: Use of Renewable and Nonrenewable Resources	Energy	Climate and Environmental	Protection	85, 87, 88
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NfS: Measures to Achieve Gender Equality	Equal pay for men and women	Responsible Corporate Management		
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NfS: Implementation of Fundamental International Labour Organization (ILO) Conventions	Supplier social labor conditions assessment	United Internet as an Employer		71
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NfS: Instruments Against Corruption and Bribery	Compliance and Anti-Corruption	Responsible Corporate Management	13
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<b>BUSINESS ACTIVITY'S IMPACTS</b>			
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**DISCLOSURE OF MATERIAL INFORMATION**


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## Overview of the Recommendations of the Task Force on Climate-related Financial Disclosures (TCFD)

Element	Recommendation	Chapter/section
Governance	Governance around climate-related risks and opportunities	Climate and environmental protection management approach
Strategy	Actual and potential impacts of climate-related risks and opportunities on the business (areas), strategy, and financial planning	Climate and environmental protection management approach
Risk Management	How the organization identifies, assesses, and manages climate-related risks	Climate and environmental protection management approach; "Risk Management" (AR)
Metrics and Targets	Metrics and targets used to assess and manage relevant climate-related risks and opportunities	KPIs in chapter entitled "Climate and Environmental Protection"

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## About This Report

This sustainability report is addressed to all United Internet stakeholders. These comprise in particular investors, analysts, customers, employees, business partners, NGOs, political representatives, and the general public.

## Report Structure, Methodology, and Frameworks

This sustainability report includes United Internet's consolidated nonfinancial report as required by the German CSR Directive Implementation Act (CSR-Richtlinie-Umsetzungsgesetz – CSR-RUG; sections 315b and 315c in conjunction with section 289c of the German Commercial Code (Handelsgesetzbuch – HGB)). The consolidated nonfinancial report for United Internet AG is included in this separate nonfinancial report.

This report contains the statutory and supplementary disclosures for the material aspects for United Internet: environmental matters, employee-related matters, social matters, respect for human rights, and anti-corruption and bribery matters. This list of the minimum aspects required by the CSR-RUG has been supplemented by "customer-related matters." These are material for United Internet and must therefore be reported. In addition to customer satisfaction, customer-related matters include information security, data privacy, and digital transformation in general – all of which are particularly relevant to the sector. This is why these topics are presented in a separate chapter entitled "Corporate Digital Responsibility."

In addition to the CSR-RUG, our reporting is based on the internationally recognized sustainability reporting standards published by the Global Reporting Initiative (GRI). This report has been prepared in accordance with the GRI Standards: Core option. Both the CSR-RUG and the GRI Standards expect information to be presented on how the material topics and their impacts are managed, and in particular the associated goals and measures, and the procedures used for risk identification and mitigation. In addition, we have applied the European Commission's Guidelines on nonfinancial reporting, which build on Directive 2014/95/EU as regards disclosure of nonfinancial and diversity information by certain large undertakings and groups – the European Directive underlying the CSR-RUG.

## Process Used to Define Material Topics

We applied the principle of materiality when defining the report content and considered the expectations of our stakeholders. The main requirements used to define the material topics were those set out in the GRI Standards, the CSR-RUG, and the abovementioned EU Guidelines. We observed the GRI Reporting Principles of Stakeholder Inclusiveness, Sustainability Context, Materiality, and Completeness during the definition process.

### Definition of Materiality

Since these frameworks are based on different definitions of "materiality," the analysis takes a variety of viewpoints into account (see also the figure next page).

Sustainability reports prepared in accordance with the GRI Standards must define material topics using the following two dimensions:

GRI 102-46



The disclosures on diversity required by the CSR-RUG are to be found in the Management Report section of United Internet Group's [Annual Report](#).

GRI 102-46

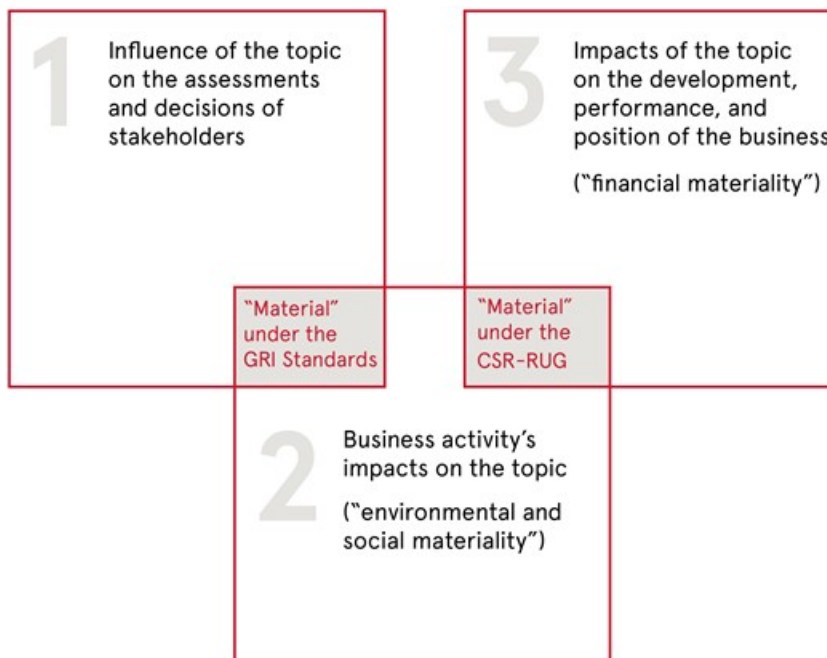
- their influence on the assessments and decisions of stakeholders and/or
- the significance of the economic, environmental, and social impacts of the organization's activities

The CSR-RUG and the EU Guidelines require at a minimum disclosures to be made on the nonfinancial aspects of environmental, social and employee matters, anti-corruption and bribery matters, and respect for human rights that are necessary to understand

- the development, performance, and position of the organization's business and
- the impact of its operations on the abovementioned aspects.

The term "double materiality" is used to describe this combination of financial materiality on the one hand and environmental and social materiality on the other.

#### Definition of Materiality in the GRI Standards and the CSR-RUG



#### Translation into Criteria for Defining Materiality

In order to do justice to both definitions, we evaluated the following criteria to define the material topics at the United Internet Group.



## 1. Influence on the Assessments and Decisions of Stakeholders

### Stakeholder Survey

Our stakeholder survey consisted of two phases. In a first step, more than 40 managers from different areas of the United Internet Group pooled their expertise to assess which sustainability topics are material for United Internet. The analysis used the topics suggested by the GRI, which also include the nonfinancial aspects from the CSR-RUG.

GRI 102-40

GRI 102-42

GRI 102-43

In a second step, this internal, employee-oriented viewpoint was then supplemented by an online survey of external stakeholders. Stakeholder identification was based on the AA1000 Stakeholder Engagement Standard (SES). The survey polled representatives of our relevant stakeholder groups: investors/analysts, business partners/customers (including wholesale partners and outsourcing providers), other suppliers, and industry associations.

The results allowed us to identify the topics that our internal and external partners consider to be material.

### Supplementary Analysis of Capital Market Requirements and Frameworks

In 2019, we also analyzed what sustainability expectations United Internet currently has to meet to satisfy investors, ESG ratings, and analysts, along with recent frameworks, standards, and initiatives. Firstly, this ensures that we can meet the requirements of the capital markets, which are becoming increasingly interested in ESG topics and which are a key target group for the sustainability report. Secondly, it helps ensure that our materiality analysis remains up to date, since innovations are often rapidly reflected in capital market decisions and in initiatives.

The following new key reference items have been included in this sustainability report: A number of ESG ratings (including MSCI, Sustainalytics, S&P, ISS, and CDP), assessments, and investor queries; the United Nations' Sustainable Development Goals (UN SDGs, also referred to as the "Global Goals"); the European Commission's revised Guidelines on nonfinancial reporting, which form part of the EU's Sustainable Finance Action Plan (including the Supplement on reporting climate-related information that was published in 2019); and the 2017 recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) on linking climate-related reporting with financial information.

As a result, we were able to expand the list of topics derived from our direct stakeholder survey and identify those topics that are particularly relevant at present.

## 2. Business Activity's Impacts

The GRI Standards, the CSR-RUG, and the EU Guidelines all define "impacts" as the economic, social, and/or environmental effects that an organization's activity has on the goal of sustainable development. This represents "environmental and social materiality," which can be of interest to consumers, employees, business partners, municipalities, civil society organizations, and society as a whole.

We adopted as broad a social perspective as possible on our organization and our sector when defining United Internet's potential impacts on society and the environment. To do this, we analyzed frameworks, standards, initiatives, agreements, studies, and research results, among other things – including materials with a sector-specific focus, where applicable. Examples include the UN SDGs (which we also examined from a sector-specific perspective), the UN Global Compact, the Paris Agreement, and studies and discussion papers produced by civil society organizations and research institutions. We comply with the CSR-RUG in the process and examine the potential impacts of our own business activity, products and services, and business relationships.

### 3. Impacts on the Development, Performance, and Position of the Business

The main criterion that we used to assess business relevance was whether a particular topic is included in the United Internet Group's financial reporting. We focused primarily on the Report on Risks and Opportunities in this context, although we also looked at other areas of the annual reporting. The sustainability topics identified in this way are considered to be directly relevant to the business.



See the [TCFD Report](#).

We then widened this analysis by consulting the expanded definition of risk used in the EU Guidelines. Our objective is to ensure a broader time frame along the entire value chain. The risk types included in the TCFD recommendations – which cover political, legal, technological, market, and reputational risk in addition to physical risk – can be used for this.

Finally, the expectations of investors, ESG ratings, and analysts as to the transparency and management of ESG topics are used as an indicator of business relevance. According to the GRI Standards and EU Guidelines, financial materiality is particularly interesting to these stakeholders<sup>(1)</sup>.

#### Results: Materiality Matrix

NfS: Material Topics

GRI 102-44

The materiality matrix shows the results of the analysis. The horizontal axis shows the impacts of United Internet's business activity on the environment and society; this dimension is common to both the GRI Standards and the CSR-RUG. The vertical axis shows the relevance of topics for stakeholders in line with the GRI Standards. The top right quadrant shows (in descending order) topics that not only represent relevant impacts by United Internet but are also important to our stakeholders. The renewed analysis of capital market players' wishes has led to a particular emphasis on these stakeholders.

The square boxes show the business relevance of the topics as defined by the CSR-RUG: Topics that have been assigned red boxes are directly relevant to the business, as can be seen from the fact that they are included in financial reporting, e.g., as part of the Risk Report. Grey boxes are used to denote topics that are currently indirectly relevant to the business if an expanded definition of risk is used (i.e., if regulatory, social, and capital market expectations are used as indicators).

<sup>(1)</sup> The EU Guidelines, among other things, draw attention to the fact that the various (risk) perspectives may overlap, and that the probability of their doing so is likely to increase even further in future.

**Materiality Matrix: United Internet's Sustainability Topics**



- Subjects with direct business impact
- Subjects with indirect business impact

An overview of how the topics identified are linked to the nonfinancial aspects under the CSR-RUG and of the action areas they are addressed in is given in the section entitled "Materiality analysis: Topics and Action Areas." in the margin notes on the NFE disclosures in this report, and in the summary table in the Annex.

The materiality analysis examines topics in accordance with both the CSR-RUG and the GRIs. There were no fundamental differences between these regarding the results of the material topics to be reported. However, the grey boxes in the matrix indicate less material topics for the CSR-RUG. Topics that would only be relevant for the GRI are not shown in this matrix, since the main objective here was to cover the overlap between the two frameworks.

See "Responsible Corporate Management" on page 11 ff.

See the Annex on page 116 ff.



See the United Internet Group's [Annual Report](#).

## Other Reporting Requirements

The CSR-RUG also requires the principal risks to be reported that are linked to the Group's operations or to its business relationships, products, and services and that are highly likely to cause material adverse impacts on the abovementioned aspects, to the extent that these risks are necessary for an understanding of the organization's development, performance, and position, and of the impacts on the abovementioned aspects. For further information please see the Risk Report in the Group's Annual Report, which presents the centrally managed risk management system.

## Reporting Period, Reporting Cycle, and Scope of Application

GRI 102-45  
GRI 102-50  
GRI 102-51  
GRI 102-52

United Internet's sustainability report is published annually. This report covers the fiscal year from January 1, 2021, to December 31, 2021. Where appropriate, prior-period figures for fiscal years 2019 and 2020 are presented or outlooks are given, as required under the GRI Standards. Such places are specifically indicated.

Since this is the sustainability report for the United Internet Group, the statements it contains apply in principle to all divisions and locations, and to all subsidiaries in which United Internet holds a majority interest. Where individual disclosures do not yet apply to all companies, locations, and areas covered by this report, this is indicated. We intend to continuously expand the data pool on which the reporting is based. The previous report was published in April 2021.

## Preparation, Publication, and Examination of the Sustainability Report

NfS: Submission of the Report

GRI 102-56

The nonfinancial report taking the form of this sustainability report is prepared and published by United Internet AG's Chief Financial Officer on behalf of the Company's Management Board. In the course of its subsequent independent examination, the Supervisory Board addressed the nonfinancial report as a whole in depth and examined it to establish whether it complies with the law, and is due and proper and appropriate. The Supervisory Board critically reviewed the content of the nonfinancial statement and discussed it with the Management Board, which was available to answer supplementary questions and provide additional information. Following its own examination, the Supervisory Board came to the conclusion that there were no grounds for any objections to the consolidated nonfinancial report.



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

This report will be publicly available in German and English as a PDF download on United Internet AG's website as from early April 2022.

## PUBLICATION DETAILS

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Note:

Rounding differences compared to the mathematically exact values for monetary units, percentages, etc. can occur in tables and references. In 2020, figures were rounded to two decimal places and adjusted retrospectively; as a result, discrepancies can occur compared to 2019.

This report is available in German and English. Both versions can be downloaded from [www.united-internet.de](http://www.united-internet.de). In case of doubt, the German version shall prevail.

### **Disclaimer**

This report contains certain forward-looking statements which reflect the current views of United Internet's Management Board with regard to future events. These forward-looking statements are based on our current plans, estimates, and expectations, and only reflect facts valid at the time when the statements were made. Such statements are subject to certain risks and uncertainties, as well as other factors which United Internet often cannot influence but which might cause our actual results to differ materially from these statements. Such risks, uncertainties, and other factors are described in detail in the Risk Report section of United Internet AG's Annual Reports. United Internet AG does not intend to revise or update such forward-looking statements.

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