

# Nonfinancial Consolidated Statement for the 2020 Financial Year

## 1 Sustainability at Medios

This report marks the first time that Medios AG is publishing a nonfinancial consolidated statement (hereinafter referred to as a "nonfinancial statement") within the meaning of the German Commercial Code (abbreviated HGB in German). We are not required to comply with Germany's CSR Directive Implementation Act (abbreviated CSR-RUG in German; CSR being the abbreviation for Corporate Social Responsibility), as the number of our employees lies below the minimum threshold, above which the application of the requirements stipulated therein would be legally binding. The reporting period corresponds to the 2020 calendar year.

Medios AG (hereinafter also referred to as "Medios" or "Medios Group") is the leading provider of Specialty Pharma Solutions in Germany. As a competence partner and expert, Medios covers all relevant aspects of the supply chain in this field: from pharmaceutical supply and the manufacture of patient-specific therapies to blistering (dispensing of individually dosed tablets). The focus is on optimal patient care via specialized pharmacies. We not only have a positive impact on people's lives, however, but also reduce the negative consequences for the environment and society through sustainable day-to-day business practices. In this first nonfinancial report, which we are publishing voluntarily, we describe the activities of the Medios Group in relation to the aspects stipulated by CSR-RUG, namely the environment, social affairs, employees, human rights, and the prevention of corruption and bribery. We have identified the following individual topics relevant to Medios as part of a materiality assessment conducted for the 2020 reporting year:

# Material Topics pursuant to CSR-Directive Implementation Act (CSR-RUG)

Nonfinancial Matters	Material Topics
Employee affairs	<ul><li> Employee satisfaction</li><li> Diversity and equal opportunities</li><li> Occupational health</li><li> Vocational and advanced training</li></ul>
Environmental affairs	<ul><li> Energy and emissions</li><li> Waste and recycling</li></ul>
Combating corruption and bribery	• Compliance
Respect for human rights	<ul><li>Business ethics</li><li>Responsible procurement</li></ul>
Social affairs	<ul><li>Patient health and protection</li><li>Civic engagement</li><li>Stakeholder dialog</li></ul>
Additional nonfinancial matters	Data security Innovative procedures and processes

Our mission is to ensure that patients have the most comprehensive access to Specialty Pharma products possible through cooperative collaboration and the exchange of information between the various market participants. In doing so, we also aim to generate sustainable economic value by integrating good



corporate governance, social responsibility, and a commitment to protecting the environment into our core business activities. For further information on our business model, please refer to section I. of the management report.

#### 2 Good Corporate Governance

#### 2.1 Compliance and Business Ethics

In addition to generally applicable laws, rules, and standards, the business activities and corporate culture of the Medios Group are characterized by our corporate values of trust, respect, integrity, and responsibility. Adhering to these values is a matter of course at our company and is also enshrined in Medios AG's Code of Conduct as part of our compliance activities. This Code of Conduct is published on our website.

Our compliance officer is responsible for coordinating and managing compliance. In addition to dealing with operational compliance issues, his range of activities also includes risk management. The compliance department's main tasks include the implementation of the group-wide Medios compliance program as well as the assessment of risks and opportunities, including conducting a review of the internal control system on an annual basis.

The compliance officer reports directly to the Chief Executive Officer of Medios AG, who regularly informs the Supervisory Board regarding current developments and issues. Further reporting is carried out on an ad hoc basis.

For the purpose of preventing and clarifying possible violations, employees of the Medios Group and external third parties have the ability to confidentially contact the Compliance Department at any time. A central whistleblowing hotline to anonymously report suspected cases was set up for this purpose in the 2019 financial year. Our employees are required to report possible compliance violations immediately. Medios thoroughly investigates every single report. With the exception of false, misleading, or fraudulent reports, we ensure that the whistleblower does not suffer any negative consequences as a result of providing us with information. There were no reports of compliance violations in the 2020 financial year.

In addition to our Code of Conduct, further requirements are in place at Medios in the form of comprehensive compliance guidelines, which we have introduced throughout the group in 2019. In this context, we apply standards that go above and beyond the applicable legal requirements. The Medios compliance guidelines govern, among other things, privacy and data protection, IT security, and the handling of grants, donations, and conflicts of interest.

To ensure that we adhere to our values on the one hand and our procedural guidelines on the other, we train our employees on a regular basis. When they join the Medios Group, employees receive various onboarding training sessions on topics including the Code of Conduct, data security, occupational safety, and accident prevention, which are repeated on an annual basis.

In the 2021 financial year, we will further expand our training program, focusing, in particular, on the following aspects: Germany's General Act on Equal Treatment for Employees and Managers, Medios AG's Code of Conduct, prevention of corruption, hygiene in the workplace, and data security in the context of remote work.

Medios strictly rejects any and all forms of corruption and bribery. We take every suspected case seriously and investigate it thoroughly. If a suspected case is confirmed, disciplinary measures are initiated by the Executive Board of Medios AG. No cases of corruption were discovered in the 2020 financial year, nor were any suspected cases of corruption reported. Similarly, we are not aware of any pending legal proceedings due to anti-competitive behavior nor of any fines or non-monetary sanctions imposed as a result of non-compliance with laws and regulations.



#### 2.2 Responsible Procurement

For successful business operations, we require products from qualified and reliable suppliers, whom we select carefully and collaborate with as partners. In order to live up to the principles of responsible procurement, not only our own conduct but also that of our suppliers is of great importance. We therefore encourage them to operate lawfully and fairly and to take sustainable aspects into account as part of their procurement activities, to the extent that their business activities permit.

Medios AG is predominantly supplied by various European pharmaceutical companies that transparently report on their working conditions, their production processes, which are as environmentally friendly as possible, and other sustainability issues. This implies that our partners operate in a responsible manner with regard to their employees, the environment, and human rights.

During procurement activities, we take a variety of criteria into account, including price, quality, area of application, a supplier's ability to deliver, and, in some cases, feedback from our customers if they have special requirements with respect to how deliveries are packaged.

Compliance with standards within the supply chain is extremely important to us. To ensure them, the Quality Assurance Department monitors not only occupational safety, but also quality. In this way, we continuously assess whether our suppliers are qualified in accordance with legal requirements. We will conduct a comprehensive evaluation of the various criteria in relation to the supply chain (e.g. with regard to respect for human rights as well as environmental issues) as part of the development of our sustainability strategy.

Our collaboration with partners is cooperative and based on a dialog. This approach gives us the ability to influence our business partners' compliance with high standards, such as adherence to GDP (Good Distribution Practice) guidelines and various legal requirements. Further control mechanisms have not yet been implemented, but are currently being projected so that they will be available to us by the 2022 financial year at the latest.

## 3 Data Security

The field in which the Medios Group operates requires absolute confidentiality. Our core business activity is supplying people suffering from serious illnesses with pharmaceuticals and patient-specific therapies in the best possible way. In this context, protecting the personal rights of those affected is a top priority.

To ensure that the data in our possession remains secure, we have appointed an external data protection officer who fulfills this task together with the Chief Innovation Officer of Medios AG. We have also appointed various data protection coordinators internally across the group.

To ensure that we can identify potential risks at an early stage and maintain our extremely high data security standards, we review and evaluate where the company stands in this regard on an annual basis. In the 2020 financial year, we did not identify any data breaches in this context. In addition, a corresponding audit is carried out every two years. Furthermore, we have defined clear instructions in the form of standard operating procedures (SOPs) and forms relating to data protection emergencies, etc. One of the most important documents in this context is our Data Protection Agreement in accordance with the GDPR (General Data Protection Regulation). New employees receive comprehensive data protection training. In addition, participation in a corresponding refresher training with our appointed external data protection officer is mandatory for every Medios employee once a year.



#### 4 Products and Services

#### 4.1 Patient Health and Protection

The health and protection of patients is our highest priority. Within the scope of our business activities, we stockpile pharmaceuticals that are ordered on a recurring basis. We respond to pharmacy inquiries within one hour and offer overnight delivery whenever possible. In this context, we work with the pharmacies as partners.

Stringent quality management procedures based on compliance with various guidelines and standards are necessary to ensure the safety of our pharmaceuticals. The GDP guidelines follow the basic principle of protecting the safety of pharmaceuticals as comprehensively as possible – both during storage and transport. On the one hand, this is achieved by preventing potential errors through the risk management system, in which appropriate measures can be taken by continuously identifying potential risks of error. On the other hand, pharmaceutical safety is ensured via the CAPA (corrective and preventive action) system. It facilitates the reporting of errors by employees to their superiors and to the responsible individual in the wholesale trade in accordance with Section 52a, Paragraph 2, Number 3 of Germany's Medicinal Products Act (AMG). The latter investigates the reasons for the deviation together with those responsible in the respective departments in order to then optimize the processes to the greatest extent possible. This results, for example, in changes to individual SOPs and employee training or briefings. Newly introduced or revised processes as well as corresponding forms are distributed to employees in print for their information, and they must sign the documents to acknowledge having received them.

In addition to the GDP guidelines, we also comply with the internationally recognized GMP (Good Manufacturing Practice) guidelines, which standardize good pharmaceutical manufacturing practices and ensure that patients always receive the pharmaceuticals they need in uncompromisingly high quality.

Our quality assurance measures already begin with the selection of suppliers and the documented inspection of incoming goods. A transparent supply chain and quality inspections of the raw materials are intended to identify counterfeits and thus play a key role in ensuring patient safety.

Quality assurance in manufacturing according to GMP covers all production processes as well as the production environment. Aseptic manufacturing is carried out in compliance with all regulatory requirements. These relate to the way clean rooms, hygiene, and clothing are handled, as well as the qualification of the manufacturing personnel and the quality inspections of the manufactured products. In addition, quality assurance ensures that further rules and regulations governing the processing, packaging, and storage of pharmaceuticals are fulfilled. To meet these requirements, clear rules apply to all employees at Medios. To guarantee product quality and occupational safety, the Medios hygiene policy stipulates, among other requirements, that all employees wear personal protective clothing, a face mask, and gloves throughout the manufacturing process. It must also be possible to fully trace the raw materials used and their batches back to their source.

In the annual training plan, job-specific training, general training on topics such as GMP, industrial hygiene, compliance, etc., and annual briefings are scheduled in advance for each employee. They form the basis for training employees before they begin their jobs and serve to ensure the respective qualification on an ongoing basis.

Compliance with standards and processes is monitored by means of regular inspections by the authorities. In addition, internal inspections are carried out in all areas of the Medios Group's companies subject to GMP in order to determine the extent to which their operations comply with the principles of the quality management system, GMP guidelines, occupational health and safety, and other legal requirements. This enables the group to verify compliance with the GxP (Good x Practice, where the "x" stands for various fields of activity) guidelines in all areas and to improve the quality of internal processes and systems.



#### 5 Innovative Procedures and Processes

To ensure that our products and services are always of the highest quality and up to date, we continuously review them and the underlying processes with a view to identifying opportunities to innovate or improve efficiency. All innovation-related activities fall under the responsibility of the heads of the departments involved and the Executive Board of Medios AG.

We continuously drive the development of new products and services as well as various process innovations to the benefit of patients and our partner pharmacies. To this end, we continuously analyze current trends and developments in the market. One trend that is currently of particular relevance is the digitization of the healthcare sector. Medios wants to play an active role in shaping this trend and has developed mediosconnect, a digital trading platform for personalized drugs that connects doctors, health insurance companies, and specialized partner pharmacies. The aim of the platform is to simplify ordering and billing processes and thus make the healthcare system more cost-effective. We initially launched mediosconnect in the German states of Berlin and Mecklenburg-Western Pomerania, and plan to soon roll out the platform in other German states to make it accessible to more users.

After that, we intend to introduce an e-prescription-enabled platform that will offer added value not only to physicians, health insurance companies, and our specialized partner pharmacies, but also to patients. Both mediosconnect and the e-prescription-enabled platform thus make it possible to benefit from the digitization of the healthcare sector.

## 6 Employees

#### 6.1 Management Approach and HR Strategy

Our business success is largely determined by the quality of our products and the reliability of our services. That is why highly qualified employees are of tremendous importance to the continuation of our company's success.

The group-wide Human Resources (HR) Department falls under the responsibility of the Chief Operating Officer. At the disciplinary level, HR decisions are made by the executive boards of the respective subsidiaries. We support the individual companies of the Medios Group within the framework of our HR business partner concept, taking into account their respective specifics. We have appointed appropriate specialists to expand our HR systems and processes and to support the team responsible for recruiting.

We are convinced that the conduct of our managers is reflected in the conduct of our workforce. Our daily activities are guided by our corporate values and our shared vision. The Medios management guidelines and corporate values will be more broadly established and formalized in the future. An important step along this path was the introduction of our Code of Conduct in the 2020 financial year, in which we laid out our shared values and the associated expectations of our employees in writing. We explain the contents of the Code of Conduct to our employees as part of a corresponding training session.

In the field of human resources, we face the challenge of ensuring that positions are filled quickly under difficult conditions such as the COVID-19 pandemic, the lack of qualified specialists, and competition from other pharmaceutical companies. As part of the recruiting process, we also rely on the services of HR consulting firms in individual cases. In addition, we have implemented an "Employees recruit Employees" program to find new employees, which has been very successful. After the current COVID-19 situation improves, we plan to establish collaborations with colleges and universities, as well as with other training institutions, in order to establish contact with graduates that we can potentially recruit.



Employee data as of December 31, 2020	Medios Group
Total Number of Employees (Active/Excluding Parental Leave)	279
Full-time employees	187
Part-time employees	92
With a temporary employment contract	15
With a permanent employment contract	264
Women	142
Men	137
Under 30 years of age	68
Between 30 and 50 years old	167
Over 50 years of age	44
Employees on parental leave	7



#### **6.1.1 Employee Satisfaction**

Successful business performance requires extremely well-trained employees, and we consider long-term employment relationships to be of the utmost importance. To ensure that employees remain with the company for as long as possible, we create numerous incentives in the form of various employee benefits and strive to achieve the greatest possible level of transparency. We achieve the latter through an ongoing dialog in which we discuss personal goals and satisfaction, among other things, as well as our own ideas regarding the respective business areas.

We want to reward our employees' outstanding performance and compete for qualified specialists. Fair compensation plays an important factor in this regard. Compensation within the Medios Group is based on the requirements of the respective position as well as the individual employee's performance. In addition to salaries, we offer attractive perks and social benefits. Employee benefits include employer contributions to company pension plans and health insurance as well as the provision of individual workplace glasses, fruit baskets, free flu shots, and full reimbursement of the cost of public transportation tickets.

During the reporting year, we conducted a company-wide employee survey for the first time to measure employee satisfaction. We also document the average length of employment with the company, which can also serve as an indicator of employee satisfaction. In the reporting year, the average length of employment was 2.9 years.

## 6.1.2 Diversity and Equal Opportunities

Diversity and equal opportunities are a matter of course throughout the Medios Group. We have also enshrined the corresponding guidelines in our Code of Conduct. We expect each of our employees to fully adhere to our corporate values. Accordingly, we prohibit any discrimination on the basis of skin color, sex and gender, sexual orientation, class, origin, physical or mental condition, ideology or religion. If employees nevertheless identify cases of discrimination, we encourage them to report these cases through our whistleblowing system, to which they have unrestricted access. To date, no suspected cases of this kind have been reported. To ensure that this remains true, we raise awareness among our employees throughout the group by means of appropriate training seminars. Due to the impact of the COVID-19 pandemic, we plan to conduct these as online trainings in the 2021 financial year.

#### 6.2 Occupational Health

As an employer, we have a duty to maintain and promote the health and safety of our employees. There are several sensitive working areas at Medios where our employees are potentially exposed to hazards. We are aware of this fact and take appropriate precautions to prevent adverse effects and harm.

Responsibility for this lies with the group's Executive Board and the respective company executives. At every Medios company, occupational safety matters are identified, addressed, and followed up on in terms of implementation within the framework of the Occupational Safety Committee (abbreviated ASA in German). This ASA consists of the company or site management, an internal safety officer, an external occupational physician, and an external occupational safety specialist.

Warehouse or shipping operations can involve physically demanding work when carrying and lifting inventory, for example, which can affect back and joint health. We reduce this risk through various work instructions, e.g. relating to occupational medicine, fire prevention, and first aid, as well as through organizational and the provision of technical measures such as ramps or trolleys.



In addition, every Medios company has a company medical service that supports internal health management and conducts the job-specific programs and mandatory examinations of employees.

We document both the number and type of occupational accidents that occur. During the reporting year, a total of 19 occupational accidents occurred, mainly resulting in minor injuries, e.g. cuts or needlestick injuries.

As part of maintaining and promoting employee health, we not only focus on the physical condition, but also want to prevent psychological pressure as a result of stress and being overworked, to the greatest extent possible. Should our employees nevertheless experience such symptoms, we work with them to develop individual solutions.

At the beginning of the COVID-19 pandemic, we drew up appropriate plans containing measures (e.g. Standard Operating Procedures) specifically tailored to the Medios company in question. They relate, for example, to protective equipment, workplace occupancy and hygiene, and the ability to trace contacts through visitor documentation. In addition, the pandemic plans include a work-from-home provision that is systematically implemented. The implementation of these measures is both monitored and documented. In addition, we provided our employees with face masks and disinfectants for personal use, and supplied food to employees in quarantine.

# 6.3 Vocational and Advanced Training

As a company that offers vocational training, we want to promote vocational and advanced training in our field of business in order to meet our current and future need for qualified specialists. As such, we offer vocational training programs in wholesale and international trade management as well as warehouse logistics.

Vocational Trainees and Interns in 2020	Medios-Group
Number of vocational trainees	2
Number of vocational trainees hired upon completing training	1
Number of pharmacists completing an internship	1

In addition, we offer our employees various HR development opportunities to support their personal and professional development. Workshops on the topics of the Medios Group's mission statement, values, and management guidelines are planned for the 2021 financial year. Furthermore, we offer our managers the opportunity to participate in various coaching sessions and specialist seminars that are individually tailored to their needs. These measures are organized locally by the individual companies.

Due to the multifaceted restrictions in place as a result of the COVID-19 pandemic, we used digital options in the 2020 reporting year to carry out the training measures, seminars, and advanced



training sessions. For example, our training sessions on data protection and employee occupational safety took place virtually.

We place a special focus on new employee onboarding in order to convey the values and organizational structures of Medios across the company on the one hand, and to ensure that employees are fully familiarized with their new jobs and workplaces on the other. The scope and type of onboarding are defined in corresponding plans, which are used as the basis for training the employee for his or her job profile. Certain profiles require training periods of up to nine months, e.g. for cleanroom activities.

#### 7 Environment

# 7.1 Environmental Management

Dealing with climate change and its consequences is one of the greatest tasks facing future generations. This challenge affects all members of society. As such, Medios must also do its part and respond accordingly. Sustainable use of the resources we need for our business activities plays an essential role in this respect. In addition to the efficient use of energy and reducing emissions, we also feel responsible for reducing the quantity of waste produced and disposing of it properly.

To this end, Medios has issued general codes of conduct and SOPs that outline these issues and, in part, stipulate a responsible approach to energy, waste disposal, packaging materials and their recycling, paper, etc.

The Executive Board is responsible for ensuring compliance. The compliance officer holds primary responsibility in the specific case of compliance with environmental law. We also rely on our employees' individual sense of responsibility, who are encouraged to act in the most energy-efficient manner possible in their day-to-day lives.

In the field of facility management, we implement concrete measures to save energy. This includes, for example, an environmentally friendly building automation system at our corporate headquarters, which enables automatic light switch-off as well as night switch-off of the ventilation system.

We intend to continuously improve our environmental management system. We have set a number of different goals for ourselves in this regard, for example with regard to the energy efficiency of newly acquired equipment or the insulation of cold storage units. In order to manage our environmental performance even more effectively, we also plan to systematically expand our current level of environmental data collection.

# 7.2 Energy and Emissions

How we obtain and use our energy largely determines the extent of our emissions. Medios does not generate the electricity required for its business operations itself. We cool our products and materials in large refrigerators or cold storage units that are powered by electricity. We obtain heat from the respective landlord of our sites in the form of natural gas and heating oil. The kilowatt hours (kWh) of electricity consumed in the reporting year can be broken down as follows:



Electricity Consumption (in MWh)	2020
Medios Group	583.2
thereof Pharmaceutical Supply	38.6
thereof Patient-Specific Therapies	544.6

We see the greatest savings potential in the improved insulation of the new cold storage units that we have been using since the 2020 reporting year. We will also reduce our consumption through the relocation that has taken place, of our corporate headquarters to an energy-efficient new building that is certified by the DGNB (German Sustainable Building Council) and meets the latest standards.

One way to operate in a more environmentally friendly manner while using the same amount of energy is to purchase green power. We intend to evaluate switching to electricity from renewable energy sources in the 2021 financial year.

In addition, we offer each of our employees the free use of a ticket for the BVG (Berlin's public transit system) in order to minimize emissions from their commute to work.

Emissions by the Medios Group (in t CO <sub>2</sub> e)	2020
Scope 1 Emissions (direct Emissions)	0
Scope 2 Emissions (indirect Emissions from Purchased Energy)	166.8
thereof purchased electricity*	100%
Scope 3 Emissions (other Indirect Emissions)	3.0
thereof business travel	100%
Total	169.8

<sup>\*</sup>Market-based approach/including electricity for cooling.



Our already low number of business trips was further reduced by the impact of the COVID-19 pandemic in the reporting year. We want to maintain and expand the trend toward virtual meetings that has been spurred on by the pandemic.

Since travel by Medios employees is low overall, company cars are also used to an acceptable extent. In addition, employees who use a Medios AG company car are increasingly choosing sustainable vehicle alternatives. As such, when selecting company cars, the majority of employees selected hybrid vehicles and only rarely diesel-powered vehicles.

## 7.3 Waste and Recycling

Medios works with a variety of substances, including hazardous substances that are recorded in a hazardous substances register. It forms the basis of the standard operating procedures that define how to handle these substances and the corresponding disposal process. Our employees regularly receive training on these standard operating procedures.

A special disposal procedure is required for cytotoxic waste, which is produced, for example, during the manufacture of pharmaceuticals. It is collected separately in a cytostatic waste container and disposed of properly by specialized companies in accordance with the waste code. In the case of hazardous waste of this type, we completely eliminate the possibility of access by unauthorized persons and/or contamination of the environment.

With the exception of masks and gloves, the protective equipment of employees working in the clean room, e.g. coveralls or undergarments, are reconditioned in a controlled process so that they can be used again. Our goal is to further increase the share of recycled and reconditioned waste, especially with regard to thermal recycling.

When transporting our products, the use of special transport containers and cold packs is necessary to preserve the quality of the pharmaceutical products. The selection of the required shipping materials is not only based on specification conformity, but also on aspects of reusability and environmental compatibility.

In order to reduce the quantity of waste produced, we intend to expand our cooperation with a specialized transport service provider in the future. The company offers temperature-controlled transport, allowing us to eliminate the use of cold packs.

# 8 Social Responsibility

#### 8.1 Civic Engagement

Like every company, Medios AG is a part of its surrounding environment. As such, our goal is to be a good neighbor at our sites in the spirit of good corporate citizenship. But beyond that, we also bear a social responsibility to operate in a sustainable and ethical manner. We are convinced that we create added value for society through our business model and our products. In addition, we promote our employees' civic engagement and donate to various charitable organizations. The Executive Board decides which projects Medios will support financially. In the reporting year, for example, we donated 100,000 masks with a total value of around €150,000 to a charitable foundation and a welfare organization.

#### 8.2 Stakeholder Dialog

We interact with different stakeholders as we conduct our day-to-day business, and they place different demands on us. In particular, we stand in close contact with the two stakeholder groups of



suppliers and partner pharmacies via various means of communication. We also engage in dialog with our partner pharmacies through networking events and regular conference calls.

As part of our brand development efforts, we conducted a survey of our partner pharmacies in the 2019 financial year. We hold regular status reviews with our suppliers at least once a year. With around 40 participants, the "Medios Specialty Pharma Day" – which we held for the first time in the 2020 financial year – represented a new level of dialog with our partners. The goal of the event was to promote networking among pharmacists as well as with us. Previously, Medios had already held smaller events of this kind.

#### 9 About This Report

This nonfinancial statement voluntarily covers the requirements of Sections 289b to 289e of the German Commercial Code (HGB) in conjunction with Sections 315b and 315c of the German Commercial Code (HGB) resulting from the CSR-RUG and contains the information required by law within the meaning of Section 289c, Paragraph 2 of the German Commercial Code (HGB) with regard to the following aspects:

- · Environmental affairs
- Employee affairs
- · Social affairs
- · Respect for human rights
- · Combating corruption and bribery

We have identified our material nonfinancial issues within the scope of a materiality assessment and in this report disclose the concepts we are pursuing in this regard – per aforementioned aspect within the meaning of Section 289c, Paragraph 2 of the German Commercial Code (HGB).

We did not make use of the option to base the structure of the nonfinancial statement on generally accepted frameworks for reporting on sustainability issues. We are continuously expanding and refining our sustainability management system and will therefore review the application of such frameworks at a later date.

In accordance with Section 289c, Paragraph 3, Nos. 3 and 4 of the German Commercial Code (HGB), the law requires us to report on significant nonfinancial risks. During a net assessment of risks within the framework of our risk management activities and in accordance with the requirements of the CSR-RUG, we have not identified any risks that are highly likely to have, or are likely to have, a serious negative impact on one or more of the aforementioned aspects.