

2018

**GROUP NON-FINANCIAL REPORT
CANCOM SE**

CANCOM

Table of Contents

GENERAL INFORMATION	3
The ten principles of the United Nations Global Compact	3
Sustainable corporate governance at CANCOM	4
Fairness First – CANCOM’s Code of Conduct	4
1. BUSINESS MODEL	5
2. RISKS ASSOCIATED WITH NON-FINANCIAL MATTERS	5
3. HUMAN RIGHTS	5
3.1 Code of Conduct	5
3.2 Diversity and gender equality	5
3.3 Data protection	6
4. LABOR	6
4.1 Code of Conduct	7
4.2 ILO labor standards	7
4.3 Training	7
4.4 Apprenticeships and dual work/study placements	7
4.5 Health and safety at work	7
4.6 Flexibility	8
4.7 Supplier relations	8
4.8 Trustworthy business partner	8
5. ENVIRONMENT	9
5.1 Energy policy	9
5.2 Energy and environmental management	10
5.3 Green IT	10
5.4 Travel and vehicle use	10
5.5 Facilities	10
5.6 Waste disposal	11
6. ANTI-CORRUPTION	11
7. SOCIAL MATTERS	12

General information

In this Group non-financial statement, CANCOM provides information on corporate social responsibility as required by Section 289c of the German Commercial Code (HGB) and Section 315c of the German Commercial Code (Handelsgesetzbuch, HGB). CANCOM signed up to the United Nations Global Compact initiative in 2015. This initiative, launched by the United Nations with the aim of promoting sustainable and responsible corporate governance, is based on ten universal principles. Through membership, CANCOM undertakes to actively support these ten principles in the areas of human rights, labor standards, environmental protection and anti-corruption and to promote them within its sphere of influence. This also includes CANCOM consistently pursuing the anchoring of these principles in its corporate strategy, corporate culture and day-to-day business and reporting annually on the progress made.

The ten principles of the UN Global Compact, covering human rights, labor standards, environmental protection and anti-corruption, cover essential parts of the reporting topics required in the group non-financial declaration according to the German Commercial Code (HGB). In this declaration, CANCOM therefore follows the format proposed by the United Nations for annual reporting under the UN Global Compact framework. The statement and its contents were supplemented by additional information if CANCOM considered this to be necessary for full compliance with the requirements of the German Commercial Code (HGB).

The Supervisory Board of CANCOM SE has examined this Group non-financial statement and formally approved it by resolution of April 29, 2019.

The ten principles of the United Nations Global Compact

HUMAN RIGHTS

Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights; and
Principle 2	make sure they are not complicit in human rights abuses.

LABOR

Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
Principle 4	the elimination of all forms of forced and compulsory labor;
Principle 5	the effective abolition of child labor; and
Principle 6	the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

Principle 7	Businesses should support a precautionary approach to environmental challenges,
Principle 8	undertake initiatives to promote greater environmental responsibility; and
Principle 9	encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery.
---------------------	--

It is requested that the terms used in the following report such as „employee“ or „compliance officer“ be understood as gender-neutral.

Sustainable corporate governance at CANCOM

At CANCOM, we believe that exercising corporate responsibility for the environment and society is not incompatible with business growth. In fact, the opposite is true. In our view, an appropriate level of sustainable growth is not possible without assuming social responsibility. As such, our vision embraces growth but includes a commitment to assume the social responsibilities created by that growth. All members of the senior management team feel an obligation to maintain sustainable business practices.

The Executive Board of CANCOM SE manages the company with the aim of achieving a sustainable increase in its value. Its members bear joint responsibility for the management of the business as a whole. The members of the Executive Board work together as a team, exchanging views and keeping each other informed of significant actions or events occurring in their business divisions. This includes matters of corporate social responsibility, corporate governance and compliance. Responsibility for ESG (environment, social and governance) forms part of the remit of a member of the Executive Board.

The Executive Board and the Supervisory Board cooperate closely in the interests of the company. The intensive and constant dialogue between the two boards forms the basis for the efficient management of the CANCOM Group. The Executive Board provides the Supervisory Board with regular, timely and comprehensive reports on all matters of importance to the CANCOM Group concerning business performance, key business transactions, planning, the risk situation, risk management and compliance. The Executive and Supervisory Boards discuss the strategic orientation of the Group and regularly assess the extent to which the strategy has been implemented. The Supervisory Board advises the Executive Board on the management of the Group and oversees its activities.

As an exchange-listed company, CANCOM already publishes information on the subject of responsible corporate governance on a regular basis. We see this Group non-financial report as supplementing the reporting obligations we have already met in other publications, in particular the declaration of conformity with the German Corporate Governance Code required by sections 289f and 315d of the German Commercial Code. This declaration can be found on our website at <https://www.cancom.com/investors/corporate-governance/> and in our annual report under the heading Corporate Governance.

Fairness First – CANCOM's Code of Conduct

CANCOM is aware of its role in society and its responsibility towards clients, business partners, stockholders and members of staff. Our Code of Conduct plays a crucial role in our efforts to maintain sustainable and responsible business practices and implement the ten principles of the UN Global Compact across the CANCOM Group and within our direct sphere of influence.



The principles set out in CANCOM's Code of Conduct establish the basis for responsible and law-abiding actions. Under the motto Fairness First, the Code reflects the Executive Board's aim of strengthening ethical standards throughout the Group and creating a working environment based on integrity, respect and fair dealing. The Code thus forms the basis for CANCOM's business activities and applies throughout the whole of the CANCOM Group. It also has a direct impact on the areas covered in this non-financial report: human rights, labor standards, environmental protection and the fight against corruption. With its own, Group-wide compliance system CANCOM works to ensure that the Code of Conduct is adhered to by its staff, officers and directors. Employees are also regularly reminded of the compliance rules and audit processes as a preventive measure. All CANCOM employees are encouraged to respond actively to potential risks and any violations of the Code. Any such concerns can be reported to designated members of the Human Resources division or the Compliance Officer or anonymously through the whistleblowing system.

1. Business model

The CANCOM Group is based in the German city of Munich. We see our role as that of a digital transformation partner, guiding our business clients into the digital future. CANCOM is one of the largest independent integrated IT systems providers in Germany. It provides IT architecture, systems integration and managed services. As a provider of integrated services, it mainly focuses on IT services, although it also distributes hardware and software. The IT services offered include IT consulting, the design of IT architectures and landscapes, and the design, integration and operation of IT infrastructure and systems. CANCOM can manage individual partial assignments or run a company's entire IT systems.

The operating business of the Group is divided into two segments: IT Solutions and Cloud Solutions.

The IT Solutions segment offers comprehensive support for IT infrastructure and applications. Its portfolio covers IT strategy consulting, project planning and implementation, system integration, IT procurement via e-procurement services or as part of a project, in addition to professional IT services and support.

Our Cloud Solutions segment handles analysis, consulting, delivery, implementation and services, thus providing clients with the necessary orientation and support for transformation of their corporate IT systems to cloud computing. As part of its range of services, the CANCOM Group is able to run parts of, or entire, IT departments for its clients, using scalable cloud and managed services – especially shared managed services.

Overall, our clients benefit from CANCOM's wide-ranging expertise and an innovative portfolio that meets the digital transformation requirements of company IT units through smart business solutions and services in relation to IT trends such as cloud computing, analytics, enterprise mobility and security. The internationally active group of companies, employing around 2,900 people worldwide, and its powerful partner network ensures market presence and proximity to clients in Germany, Austria, Switzerland, Belgium, the United Kingdom and the United States, among other locations.

2. Risks associated with non-financial matters

One of the basic principles of responsible business management based on stockholder value maximization is that management should exploit business opportunities while at the same time anticipating and controlling the associated risks. The ongoing management of opportunities and risks, including the efficient monitoring and early identification of risks, is an integral part of strategic and business development and of the internal monitoring and control system within the CANCOM Group. A description of the Group's internal risk management system can be found in our annual report under the heading 'Risks and opportunities report'. The report provides detailed explanatory notes on individual material risks of both a financial and non-financial nature associated with our own business operations and business relations. Further information about the requirements of sections 289c and 315c of the German Commercial Code can also be found in the risks and opportunities report as part of our annual report.

3. Human rights

CANCOM has expressly committed itself to protecting human rights and makes every effort to ensure that those rights are upheld within its sphere of influence. CANCOM does not tolerate any form of discrimination, racist statements or harassment in the working environment with regard to age, physical or mental abilities, origin, gender, political views, religion, ideology or sexual orientation.

3.1 Code of Conduct

The principles which apply to the protection of human rights form part of CANCOM's Code of Conduct. All employees of the CANCOM Group are obliged to observe the Code of Conduct regardless of their location or position.

3.2 Diversity and gender equality

CANCOM does not tolerate any form of discrimination. Accordingly, we also comply with legislation concerning the right of both women and men to be considered equally for management positions in the private and public sectors and with the provisions of the German Corporate Governance Code in relation to gender equality and diversity.

On September 18, 2015, in accordance with the German Equal Participation of Women and Men in Leadership Positions in the Private and Public Sectors Act (Gesetz für die gleichberechtigte Teilhabe von Frauen und Männern an Führungspositionen in der Privatwirtschaft und im öffentlichen Dienst, BGleIG), the Supervisory Board, for the first time, set targets for the representation of women on the Executive Board and Supervisory Board, both of which were to be met by June 30, 2017. On June 20, 2017, the Supervisory Board set targets for the representation of women on the Executive Board and Supervisory Board, both of which have to be met by June 30, 2022.

The Supervisory Board respects the objectives underlying the introduction of a quota for female participation in management, and places great importance on equal treatment of, and equal opportunities for, men and women. Appointments to Executive Board and Supervisory Board positions should be made in the best interests of the company. The Supervisory Board is of the view that this can be best achieved by placing the primary emphasis on the person's special expertise and qualifications. The representation of women on the Executive Board will remain at zero percent. The Supervisory Board has set a target of 16.67 percent for female representation on the Supervisory Board.

In addition, on September 30, 2015, the Executive Board of CANCOM SE set, for the first time, a target of 25 percent for female representation in the first level of management below the Executive Board, and 30 percent for the second level of management, to be achieved by June 30, 2017. These targets were designed to give the company the necessary flexibility when making appointments to management positions. On June 30, 2017, the Executive Board set targets for the representation of women in the first and second level of management below the Executive Board, both of which have to be met by June 30, 2022. Female representation in the first and second level of management below the Executive Board will remain at 25 percent and 30 percent respectively.

3.3 Data protection

Over many years, we have built up a great deal of experience in the field of IT security. We know how important it is to handle information with great care in order to protect our business operations. Alongside these business reasons for prioritizing data security, we see the task of protecting all the personal data we store as a crucial part of our responsibility to respect each individual's personal rights. One of our main business objectives is to maximize the level of security provided by our clients' IT systems. At the same time, we have set high data protection standards for our own in-house systems.

The goals of ISO 27001 for information security management systems (ISMS) are to ensure that all confidential data is protected, that the integrity of operating data is maintained, and that the data remains available at all times. At CANCOM, we believe that a certified ISMS provides a crucial basis for our day-to-day operations.



The Group also implements the EU's General Data Protection Regulation (GDPR), which supplements other regulations (already implemented by CANCOM) linked to the Federal Data Protection Act (Bundesdatenschutzgesetz, BDSG).

In fiscal 2018, no information was submitted to the CANCOM Group about violations of human rights or discrimination in relation to its business activities. The CANCOM Group was not involved in any investigations or legal procedures in connection with possible violations of human rights or in connection with any of the other areas described in this section of the report.

The targets for female representation on the Executive Board, Supervisory Board and the first and second level of management below the Executive Board were all met in fiscal 2018.

4. Labor

CANCOM expects a high level of dedication and commitment from its staff and, in return, offers opportunities for advancement and career prospects tailored to their individual needs. The most important criteria for the development of our staff are performance and potential.

CANCOM ensures that recognized labor standards are observed at all its locations. We do not tolerate any form of forced labor or child labor. Equally, CANCOM does not tolerate any form of discrimination with regard to appointments and to the work performed by or expected of employees. We believe that women and men should as a matter of course receive the same pay for the same work. Germany's statutory minimum wage requirements are observed throughout the company.

4.1 Code of Conduct

Behavior towards staff must be just and fair at all times. Our staff should have the feeling that they can discuss all problems related to their work in the CANCOM Group on a confidential basis. This involves a culture of learning that values and encourages candid and objective feedback from all parties involved. These principles are also embedded in CANCOM's Code of Conduct.

4.2 ILO labor standards

The core labor standards of the International Labor Organization (ILO) are based on four basic principles:

1. Freedom of association and the right to collective bargaining
2. Elimination of forced labor
3. Abolition of child labor
4. Elimination of discrimination in respect of employment and occupation

The goal of these basic principles is to make globalization fairer and more inclusive. CANCOM supports these four principles as a matter of course.

4.3 Training

In 2018, CANCOM spent around EUR 2.7 million, or around six percent of net income after taxes, on external training alone as an investment in staff development. Compared to 2017, training expenses have thus risen by around 69 percent from EUR 1.6 million to EUR 2.7 million.

In addition, internal training for employees on various standard programs such as Excel courses or technical training courses are held every year. The expenses for internal training are not included in the training expenses mentioned above.

4.4 Apprenticeships and dual work/study placements

CANCOM attaches great importance to the qualified training of young people. CANCOM therefore offers 18 different training occupations and dual courses of study nationwide. The spectrum ranges from classic IT training occupations (IT specialist for system integration, IT system electronics technician, IT system merchant) to dual courses of study in the fields of computer science, business informatics, IT management, marketing and media design.

CANCOM Group	2015	2016	2017	2018
No. trainees	179	181	201	211
No. dual students	22	22	29	40
Trainee rate	6.7	6.9	7.2	6.8
Total no. employees (net)	2,724	2,654	2,855	3,403
Total no. employees (gross)*	2,997	2,935	3,155	3,707

* incl. trainees, dual students, interns, employees on parental leave or partial retirement, Executive Board

CANCOM Group	Traineeship		Dual Studies	
	2017	2018	2017	2018
Commercial	56	30	11	16
Technical	136	174	16	22
Other	9	7	2	2

Compared to the relevant average in the comparable company size, CANCOM provides significantly more training. With a training rate of 6.8 percent, CANCOM is two percentage points above the average. In terms of the information and communication sector, the training quota is more than twice as high as the industry average (source: Federal Institute for Vocational Education and Training, data report on the Vocational Education and Training Report 2018). The takeover rate is between 75 and 80 percent. This rate has remained constant since 2014.

4.5 Health and safety at work

CANCOM attaches great importance to safety at the workplace. The safety and health of employees at work should be ensured by occupational health and safety measures. For this reason, CANCOM has defined certain framework conditions for the intensity of safety-related and occupational-medical support of the company in accordance with the requirements of the existing German Occupational Safety Act and certain accident prevention regulations of the respective employers' liability insurance associations. In order to ensure these framework conditions, specialists for occupational safety are available. Their activities include, for example, the regular inspection of the individual locations, moderation of the regular meetings of the health and safety committee, preparation of instruction materials, preparation of accident statistics, regular review and maintenance of risk assessments, preparation of operating instructions, etc. In terms of occupational medicine, the ergonomic design of the workplaces also includes inspections of the respective locations. In addition, the first-aid facilities are checked and managers are advised on the

safety and health protection of employees at work. In addition, a database was developed as a source of evidence and information for all employees, but also for authorities.

4.6 Flexibility

The approximately 3,400 CANCOM employees are all different personalities with different performance curves and preferences. For this reason, CANCOM relies on flexibility: As far as possible, every employee can help shape his or her own optimum working hours. The CANCOM Digital Workspace enables employees at the technological level to work from anywhere and at any time across devices - even from home, if possible and required.

4.7 Supplier relations

CANCOM adheres strictly to its Fairness First principle in all situations and in every part of the Group. We are keen to ensure that suppliers and manufacturers are also treated fairly, and this commitment is backed up by our Code of Conduct that is mandatory for all employees. In return, CANCOM makes specific demands of its suppliers and manufacturers. All suppliers and manufacturers that work with CANCOM are expected to meet certain qualitative, ethical and legal criteria.

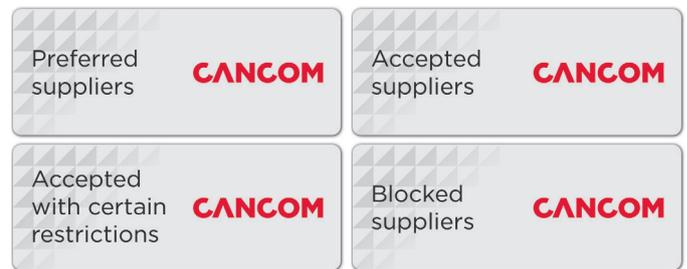
CANCOM conducts regular evaluations to ensure that its suppliers observe a range of qualitative and ethical standards.

The ethical questions we ask include:

- Does the company have a policy on the treatment of employees, the environment, suppliers, and clients?
- Does it have a corporate social responsibility action plan?
- Has the company obtained appropriate certification of its environmental and IT security policies?
- Is there a code of conduct?

Furthermore, all relevant suppliers and manufacturers that work with CANCOM are required to provide a written assurance that they pay their workers in accordance with Germany’s Minimum Wage Act (Mindestlohngesetz, MiLoG).

Together with other factors, these criteria form part of our supplier evaluation. The responses are then reviewed and assessed by the Compliance Officer. On this basis, suppliers are allocated to one of four groups:



Preferred suppliers	Show very good performance. Due to this, only minor measures are necessary.
Accepted suppliers	Show an average performance and only some individual improvements are necessary. Suggestions for optimisation are being communicated to these suppliers.
Accepted with certain restrictions	A more significant improvement of the performance is necessary. Suppliers are requested to improve.
Blocked suppliers	Show insufficient performance and are being banned from the pool of bidders - or are being phased out.

4.8 Trustworthy business partner

The Authorized Economic Operator (AEO) concept was introduced by the World Customs Organization as a joint measure to help protect global supply chains. Certified companies are deemed to be reliable and trustworthy and therefore qualify for simplified customs treatment. As an AEO, CANCOM guarantees that it complies with customs and tax regulations, maintains adequate record-keeping standards, is financially solvent, meets appropriate safety standards, and meets practical standards of competence in its sector. In this way, CANCOM helps to make global trade simpler and more secure and is able to project itself as a trustworthy business partner.

5. Environment

At CANCOM, we are fully aware that there are limits on the availability and supply of natural resources. For this reason, we believe that an adequate sustainability policy to protect the environment provides a crucial basis on which to pursue the Group’s long-term goals. We therefore make consistent efforts to implement measures designed to reduce any negative impact on the environment.

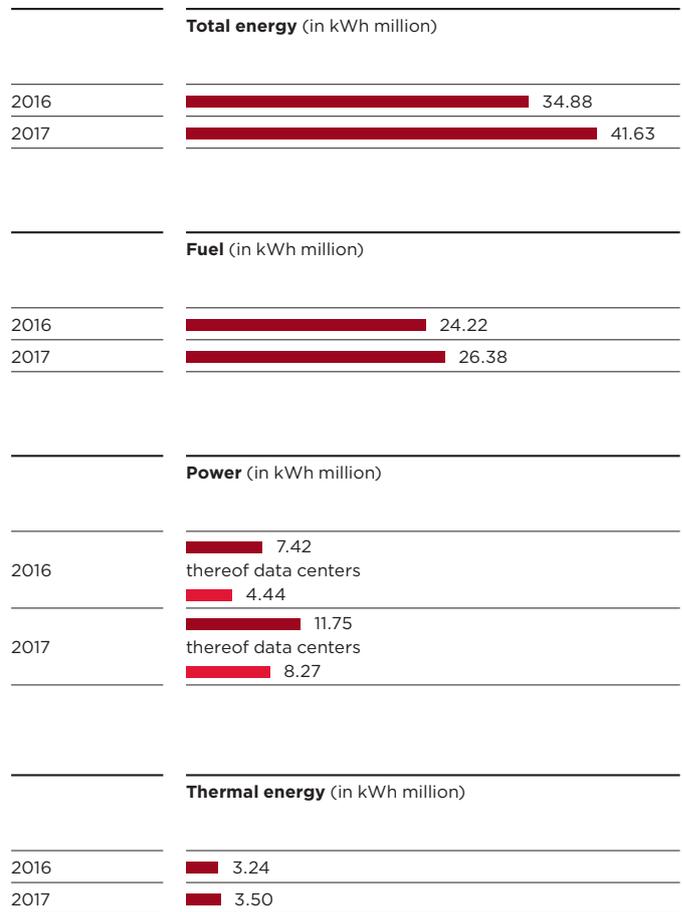
CANCOM does not operate any conventional production sites with machinery. As such, the Group’s ‘business operating equipment’ consists more broadly of the IT equipment used by employees, its own computer centers, company vehicles and other facilities. Sales of hardware generate a substantial amount of packaging waste that is directly attributable to our business activities. CANCOM strives to demonstrate environmental awareness in its operations, especially in these areas.

5.1 Energy policy

At CANCOM, the term energy stands for all forms of energy that can be acquired, stored, used or recovered. Energy occurs in the form of electricity, fuel, heat, steam or compressed air. The production or use of energy sources releases carbon dioxide, which pollutes the climate. Renewable energies are climate-neutral. For CANCOM, energy awareness means improving energy-related performance by reducing the use of energy and increasing energy efficiency.

Responsibility for climate protection begins with the company management. It defines the energy policy and supports its development and compliance. However, CANCOM also requires that individual employees act in an energy-conscious manner. In order to continuously reduce consumption, energy should be used sparingly. For this reason, CANCOM has established binding rules of conduct for every employee. CANCOM is also pursuing the goal of increasing energy efficiency in mobility, data storage and daily work. Where possible, attempts will be made to use renewable energies. It is important for CANCOM to make potential improvements visible in order to derive measures to increase efficiency from them. For this reason, an energy team monitors energy planning and the improvement of energy-related performance.

The following figure shows the development of CANCOM SE’s energy consumption. Due to the collection interval of the information shown, the data for the 2018 financial year are not yet available at the time of publication of this report. A comparison of the figures for 2016 and 2017 shows an increase in the areas of total energy, fuels, electricity and heat. The increase is due to CANCOM’s significant corporate growth in fiscal 2017, as the overall demand for energy has also increased as a result of company acquisitions, the opening of new locations and the increase in the number of employees.



5.2 Energy and environmental management

Since 2015, legislators have obliged companies to carry out an energy audit EDL-G 16247 or to introduce an ISO standard (ISO 50001:2011). Based on this commitment, CANCOM introduced the ISO 50001:2011 energy management standard in 2016.

5.3 Green IT

Within the framework of the CANCOM portfolio, the focus on so-called green IT plays an important role. CANCOM supports customers in the use of energy-saving and environmentally friendly IT components and architectures.

CANCOM also makes extensive use of these technologies itself. Within the company, there are requirements to procure only devices with corresponding energy-saving functions. In addition, there are requirements for energy-efficient use by employees. CANCOM also introduced the Workplace of the Future throughout the Group in 2014. The most important aspect of CSR is the so-called SMART Collaboration. The introduced UCC solution (Unified Communication and Collaboration) with extensive possibilities for telephone conferences / video conferences is available to all employees on different terminals and platforms. This has a reducing effect on travel behavior, which in turn leads to a reduced consumption of energy.

In data centers thereof data centers, virtualization is generally used to enable a reduction in the number of dedicated servers and to reduce the power consumption of individual unused components. In addition, the use of optimized cooling mechanisms can significantly reduce power consumption or modern power monitoring tools can monitor power consumption, performance and other parameters more precisely. Over the past few years, CANCOM has generally reduced energy requirements by around 40 percent, for example at the computer center in Jettingen-Scheppach.

5.4 Travel and vehicle use

To support the avoidance of travel activities through technical communication solutions, the Group-wide Car Policy pays attention to greenhouse gas and pollutant emissions. The aim is to reduce fuel consumption. The focus here is primarily on replacing old vehicle models with newer, more energy-efficient models. This enables CANCOM to achieve reductions in fuel consumption and emissions.

In 2018 alone, 253 vehicles were replaced. The average CO₂ emissions of the newly commissioned vehicles are about 3 g/100 km below the value of the replaced vehicles.

The CANCOM Group currently has 1,520 vehicles at its disposal. Compared to last year, this is 36 more vehicles.

In addition to modernizing its vehicle fleet, CANCOM is increasingly trying to integrate rail and train travel into its employees' travel activities. CANCOM booked 4,517 train trips in 2018. In this way, environmentally friendly green electricity was used for employee travel and the emission of CO₂ and other pollutants was greatly reduced compared to driving a car.

Saved resources due to usage of trains compared to cars

2018	PEV (l fuel equivalent)	CO ₂ (kg)	No _x (kg)	PM ₁₀ (kg)
Train	30,433	7,691	26.00	1.00
Car	104,821	221,889	1,044.00	9.00
Saving vs. car (total)	-74,388	-214,198	-1,018.00	-8.00
Saving vs. car (percent)	-71.0 %	-96.5 %	-97.5 %	-88.9 %

The CANCOM Group's tendency to travel by rail is increasing. In fiscal 2018, the CO₂ saving was 214,198 kg.

5.5 Facilities

In the CANCOM branches, special attention is paid to reducing electricity/energy consumption within the framework of the structural and landlord-specific framework conditions. The measures include reducing water consumption, using more efficient heating technologies and replacing lighting with more energy-efficient LED tubes. In addition, the use of photovoltaic systems reduced the electricity costs for the main logistics and administration location in Jettingen-Scheppach by up to 30 percent. At the same time, the electricity purchased is increasingly being replaced by regenerative and environmentally friendly electricity.

5.6 Waste disposal

As an IT service provider that is also active in hardware trading, its business activities generate large amounts of waste, especially packaging materials. The issue of disposal is therefore a key factor in reducing the environmental impact of our business activities.

CANCOM only works with certified companies for disposal purposes. In addition to DIN EN ISO 14001:2015-11 (environmental management system), all service providers who work with CANCOM are certified to comply with the requirements of the German Waste Management Ordinance.

CANCOM's largest logistics center is located in Jettin-gen-Scheppach. For this reason, CANCOM has commissioned INTERSEROH Dienstleistungs GmbH to collect and recycle packaging materials in order to conserve resources and protect the environment. According to INTERSEROH, the recycling of PE/PP/mixed plastics, paper/cardboard/cardboard, lightweight packaging and wood resulted in a calculated saving of 238 tons of resources and an additional 30,359 kilograms of greenhouse gases in 2017. By comparison, 180 tons of resources and an additional 21,541 kilograms of greenhouse gases were saved in 2016.

No information on the results for the 2018 financial year was available at the time this report was published.

6. Anti-Corruption

CANCOM undertakes to conduct its business in accordance with applicable laws, regulations and guidelines. CANCOM does not tolerate corruption and bribery, nor does it tolerate conduct that involves doing business with unfair means. The CANCOM Group's principle of acting with integrity and honesty and meeting high quality standards is based on this commitment and helps to ensure the long-term success of the company.

These issues are laid down in the Code of Conduct and are binding for all CANCOM employees. In addition, there is a policy on the granting and receipt of benefits and entertainment in order to create a clear and binding framework for each employee. Correct behavior is also taught to employees in an obligatory online training course. Should there nevertheless be any ambiguities or questions, the Compliance Officer is available as a contact at any time.

Our internal audit department regularly checks relevant business transactions for compliance. In addition, all employees are encouraged to actively address violations or report them anonymously via the CANCOM whistleblowing system.

In fiscal 2018, the CANCOM Group had no knowledge of any cases of corruption and/or bribery in connection with its business activities.

7. Social matters

CANCOM maintains contact with government and local authorities, e.g. to obtain planning consent for major building projects. We also support the involvement of the company and individual employees in local initiatives, both for charitable purposes and in non-profit associations. However, there is no specific policy for this dialog or engagement outside of our anti-corruption measures. In terms of reporting on 'social matters', as prescribed in sections 289c and 315c of the German Commercial Code, CANCOM has not identified any issues or risks arising from its business activities or sporadic cases of social engagement that are deemed to be sufficiently material to be included in this report. As such, no specific policy has been established for this area.

IMPRINT

Publisher

CANCOM SE
Erika-Mann-Straße 69
D-80636 München, Germany
www.cancom.de

Contact

Sebastian Bucher
Manager Investor Relations
Phone: +49 89 54054 5193
ir@cancom.de