

Inclusion Action Plan

2026 - 2030

Table of Contents

1 FOREWORDS..... 2

2 FRAMEWORK FOR INCLUSION AT UNITED INTERNET 4

3 AREAS OF ACTION: INCLUSION ACTION PLAN 6

 3.1 Strategic integration..... 8

 3.2 Awareness and competence 13

 3.3 Accessibility 15

 3.4 Recruitment and Support 19

4 GLOSSARY 24

1 FOREWORDS

Foreword by the Executive Board of United Internet AG

In line with our diversity mission statement, we are committed to an open and non-discriminatory working environment. Diversity and inclusion should be part of our corporate DNA – an ethos that we actively embody, both internally and externally. For a workforce that reflects the many facets of our society and our customers. And for a working environment in which all employees can realize their full potential and contribute to the sustainable success of our company – regardless of their individual circumstances.

United Internet believes that diversity drives innovation and that inclusion makes us stronger – as a society and as a company.

For us, inclusion means breaking down barriers – physical, digital and in people’s minds. People with disabilities and neurodivergent colleagues should not only work with us but also help to shape our organization. We aim to enable participation through strategic integration, targeted awareness-raising, accessible workplaces, inclusive processes and appropriate support services.

Our ‘Inclusion Action Plan’ reflects this philosophy.

It sets out what we are already doing, what we have set out to achieve by 2030, and how we will evaluate our progress. The plan was developed based on an audit in collaboration with internal and external stakeholders. The Action Plan applies to our German sites. We invite all applicants, employees, managers, customers and partners to join us on this journey. Because inclusion can only be achieved together.

Montabaur, 28 May 2026

Carsten Theurer
Chief Financial Officer (CFO)

Foreword by the Group Contact Person for Inclusion

Inclusion should be something entirely natural, both in everyday life and at work – a sense of belonging that requires no special explanation or additional planning. We wish to reinforce this sense of normality and embed it deeply in our thinking and actions.

Our Inclusion Action Plan is designed to achieve precisely this goal. We have set out several steps to be taken by 2030 that will take us further along the path to becoming a more inclusive employer. Each of these steps opens new perspectives, inviting us to reflect together, to consistently develop our measures further, or to refine them where necessary.

However, this can only succeed if we actively embody the spirit of 'WE', shape our initiatives in line with business requirements, and maintain an ongoing dialogue with one another.

Karlsruhe, 28 May 2026

Sven Oechsle

Group Contact Person for Inclusion and Project Lead for the Inclusion Action Plan

2 FRAMEWORK FOR INCLUSION AT UNITED INTERNET

Our Action Plan for Inclusion is based on the following legal, political and social principles, which define the rights and opportunities for participation of people with disabilities. They provide us with guidance – whilst also setting out a clear objective.

UN Convention on the Rights of Persons with Disabilities (UN CRPD)

The UN CRPD is an international treaty designed to ensure the equal participation of people with disabilities in all areas of life – including work, education, health and social life. Following its ratification by Germany, the Convention provides a clear point of reference for companies to remove barriers and actively promote inclusion.

The Federal Government's National Action Plan

The Federal Government's National Action Plan 2.0 for the implementation of the UN Convention on the Rights of Persons with Disabilities (BMAS, 2016) describes inclusion as a principle to be realized in all areas of life and establishes a comprehensive system of objectives based on human rights to this end. It aims to strengthen the participation of people with disabilities in all areas of life and to systematically remove barriers in society, education and working life.

Participation Recommendations 2025

The Participation Recommendations published by the Federal Government Commissioner for the Affairs of People with Disabilities provide practical impetus for greater inclusion – particularly in the areas of work, education, health, digitalization and protection against violence. Accordingly, we wish to seek practical ways of facilitating participation in working life.

Social Code Book IX

Social Code Book "Sozialgesetzbuch" IX (SGB IX) forms the legal basis for the participation of people with disabilities in working life. It obliges companies above a certain size, for example, to employ a specified proportion of people with severe disabilities (Section 154 SGB IX). If this quota is not met, a compensation levy must be paid. Furthermore, SGB IX sets out special protection rights, funding opportunities and accessibility requirements in the workplace.

Accessibility Enhancement Act (Barrierefreiheitsstärkungsgesetz - BFSG)

The BFSG defines new standards for the accessibility of products, services and digital offerings. Since 28 June 2025, specific accessibility requirements have applied to certain products and services, for example websites, apps and certain digital services. United Internet views this legal obligation as an opportunity: we systematically review and improve our offerings to make them accessible to everyone.

Did you know?

- Just under 91% of severe disabilities in Germany are caused by an illness
(Source: [Statistisches Bundesamt](#)).
- Around 3% of severe disabilities were present from birth or developed during the first year of life
(Source: [Statistisches Bundesamt](#)).
- At the end of 2023, there were approximately 7.9 million people with severe disabilities in Germany, representing 9.3 per cent of the total population
(Source: [Statistisches Bundesamt](#)).
- Around 15–20% of people are considered neurodivergent – including people on the autism spectrum, people with ADHD, Tourette syndrome, learning disorders or giftedness.
(Source: [Deloitte](#)).
- In 2024, 53.7 % of adults in Germany reported suffering from a chronic illness or a long-term health problem
(Source: [Robert Koch Institut](#)).

3 AREAS OF ACTION: INCLUSION ACTION PLAN

Strategic Objectives

As a successful company, we take responsibility – for our actions and for society. Sustainability and responsible business practices are a matter of course for us. Our dedicated staff form the foundation for this. As an employer, we nurture individual strengths and create opportunities for development. We are convinced that actively practicing diversity and inclusion makes us strong, creative and unique – and enables us to shape the digital future together and create real added value for our customers.

With our ‘Inclusion Action Plan’, we are therefore pursuing the goal of taking concrete and effective steps to:

- be recognized as an attractive employer for people with disabilities and neurodivergent people, and to increase their representation within our company,
- tangibly and sustainably improve the conditions for the participation of these groups in our working environment,
- strengthen health-promoting and safe working conditions, identify risks and strains at an early stage, and maintain employees’ ability to work in the long term.

Key areas of action

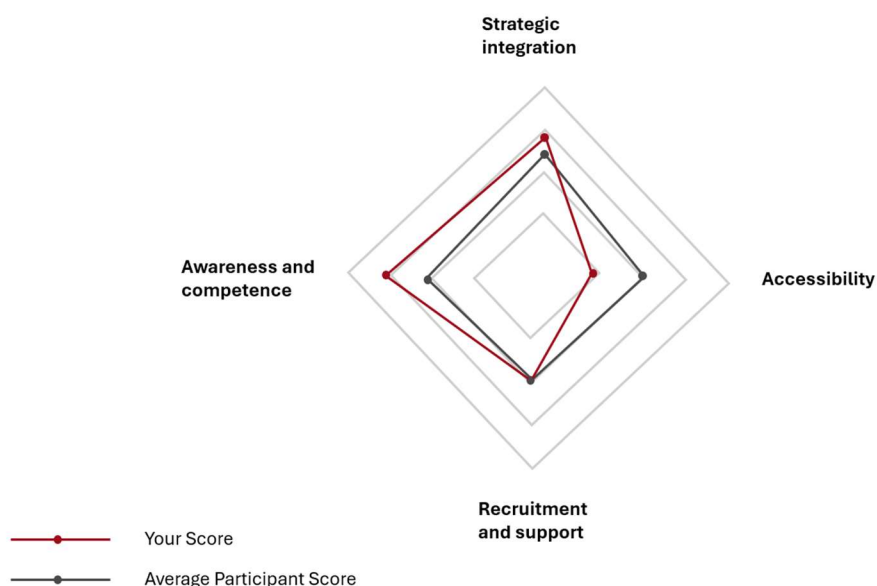
The measures contained therein were developed in collaboration with internal and external stakeholders and are guided by legal requirements, internal needs and best

practices. The action plan is divided into four key areas of action:

- Strategic integration
- Awareness and competence
- Accessibility
- Recruitment and support

This structure enables us to work systematically on the relevant levels for greater inclusion.

Results in an Industry Benchmark Comparison



Key Inclusion Assessment Results for United Internet 2025

Scope and Target Group

Disability encompasses a wide range of impairments – physical, intellectual and psychological – and may also include chronic conditions and neurodivergent characteristics, if these, in interaction with barriers, impede equal participation.

Disability does not arise solely from individual characteristics, but primarily from barriers in the environment and within social structures. These barriers prevent equal participation and make it necessary for organizations to actively ensure appropriate conditions and support services.

It is important to us to recognize the diversity of disabilities as well as the overlaps with other dimensions of diversity (intersectionality). We focus not on categories, but on the individual abilities and potential of every person – whilst respecting personal needs and life circumstances.

3.1 Strategic integration

Strategic embedding means establishing inclusion as an integral part of our corporate and sustainability strategy – with clear objectives, responsibilities and structures – thereby systematically enabling change.

What we are already doing

To develop our Inclusion Action Plan, we commissioned the social enterprise myAbility to carry out a comprehensive assessment. The so-called Key Inclusion Assessment was carried out in 2025 in accordance with the international standards of the Global Business and Disability Network of the International Labour Organization (ILO). The results show that, compared with the rest of the industry, United Internet is at a solid average level in terms of the strategic embedding of inclusion (see p. 7). This assessment provides a stable starting point for the targeted further development of our structures and the systematic strengthening of inclusion.

Embedding in corporate values, the Code of Conduct and guidelines

Our Code of Conduct, updated in 2025, forms the basis for conduct characterized by integrity, compliance and respect within the United Internet Group. It concisely summarizes key rules of conduct – based on our corporate values such as fairness, openness and responsibility. With regard to inclusion, the following areas are particularly relevant:

- Interaction with employees: “We promote a working environment characterized by mutual respect.”
- Diversity and a discrimination-free working environment: “We promote a working environment characterized by tolerance and diversity and free from discrimination.”
- Health and safety: “We ensure safe and healthy working conditions.”
- Gender-sensitive and non-discriminatory language: “Non-discriminatory and gender-sensitive communication is an integral part of our corporate culture.”

United Internet has been a signatory to the Diversity Charter since 2021, thereby committing itself to a prejudice-free working environment. In 2022, we published an internal guideline on gender-sensitive and non-discriminatory external communication, which was supplemented in 2023 by a guide to non-discriminatory visual language.

In 2025, we joined the ‘Working with Cancer’ initiative with our own pledge. The initiative works to destigmatize cancer and promotes an open, supportive working environment in which employees living with cancer can work and recover without fear.

Diversity and Sustainability Strategy

Our diversity strategy is a central component of the Group-wide sustainability strategy. As part of its development, a dual materiality analysis was carried out. In doing so, United Internet identified both positive and negative impacts on employees’ wellbeing – as well as associated business risks.

Regarding the topic of inclusion, impacts, risks and opportunities (IROs) are particularly relevant, as described in the 2024 Sustainability Report (see p. 24 ff.).

Impact: Negative effects (see United Internet Sustainability Report 2024, p. 24 et seq.)

Health risks in the workplace	Employees are exposed to various stresses in the workplace, which can be both physical and psychological in nature. Excessive workloads, a poor work-life balance and inadequate health and safety measures can lead to increased stress and physical and mental health problems. A lack of safety precautions and inadequate protective measures increase the risk of accidents at work and injuries. Furthermore, inappropriate behavior, physical assaults, bullying and harassment can lead to serious psychological distress, and in extreme cases, incapacity for work.
Lack of equal opportunities and inclusion	An inclusive corporate culture is crucial for promoting social justice and the well-being of all staff. A lack of awareness amongst managers and staff leads to a wide range of disadvantages for under-represented groups. They are excluded from meetings due to language, physical or time-related barriers (part-time) and are unable to identify with the corporate culture. A lack of accessible workplaces excludes people with disabilities and reduces their opportunities in the labor market. Unconscious biases and unsuitable working conditions (a lack of part-time options, a lack of accessible workplaces) and unequal pay ensure that employees are restricted in their career opportunities or are not considered for leadership positions on the basis of gender, age, background or physical limitations, which can cause psychological and financial strain.

Impact: Positive effects

Social security through fair working conditions	Secure, permanent employment contracts with protection against dismissal, as well as fair, transparent remuneration, can provide social security and promote social stability. An open social dialogue makes it possible to regularly identify measures to improve working conditions, which in the long-term increases staff satisfaction. Clear career development opportunities and equal opportunities can foster a sense of being valued, whilst comprehensive additional benefits in the areas of health, finance and the environment can improve staff's quality of life.
--	---

Employment and inclusion of people with disabilities (employees in the value chain)	Collaboration with inclusive business partners actively supports inclusion and promotes the employment of people with disabilities throughout the value chain. This not only helps to create a more diverse and inclusive working environment but also strengthens equal opportunities and social justice. At the same time, it promotes the independence, self-esteem and social integration of people with disabilities.
Risks	
Skills shortages and staff turnover caused by unattractive working conditions	United Internet competes with other companies for highly skilled staff and managers. In some areas, there is a shortage of skilled workers. If insufficient investment is made in staff development (e.g. through training and skills development) and in creating attractive, secure working conditions, staff satisfaction declines. This leads to higher staff turnover and absences due to illness. The company's appeal as an employer diminishes, which makes it more difficult to retain and recruit qualified specialists. In the long term, this leads to a loss of innovative capacity, speed of implementation and growth potential, resulting in increased costs and the loss of customers due to competitive disadvantages.

Since 2024, inclusion has been enshrined as one of three key focus areas in our diversity strategy (*Diversity Strategy House*). The strategy was developed in 2023/2024 under the leadership of the Corporate Health, Diversity & People Experience department, in collaboration with various stakeholders – including HR, Sustainability, the Executive Board, the Supervisory Board and the diversity employee networks. It was based on a Group-wide employee survey on diversity.

The specific objective for the focus area of inclusion was defined as the development of an Inclusion Action Plan by the end of 2025 – which we hereby present. For the period up to 2030, we have set ourselves the objective of systematically implementing this plan as part of our sustainability strategy (see Annual Report 2025, pp. 163–164).

Cross-segment Diversity Project Team and Group Contact Person for Inclusion

The implementation of the Group-wide diversity strategy is managed by the 'United in Diversity' project team. It comprises designated diversity representatives from the HR teams of the various segments as well as a member of the Corporate Sustainability Team. The project is led by the Group department Corporate Health, Diversity & People Experience.

This department also houses the central Group contact person for inclusion. This person is part of the network of Trusted Persons (see the 'Support' chapter) and the diversity project team. In some parts of the company, there are also representatives for employees with severe disabilities, with whom a regular exchange takes place.

In 2024, the Group contact person initiated a safe space network for affected employees, which meets every two months and is growing steadily (see the 'Support' chapter).

The Diversity Project Lead and the Group contact person for inclusion report regularly to the segment HR heads, the Executive Board and the Supervisory Board. Progress is documented in a roadmap document and via a diversity dashboard in SAP Analytics. Employees receive updates via the intranet. Externally, we communicate via the sustainability report, LinkedIn and our careers page. We also participate in ESG ratings such as ISS, MSCI, Sustainalytics and EcoVadis.

Mandatory e-learning on diversity and inclusion with a focus on inclusion

All employees of the United Internet Group complete a mandatory 'Diversity & Inclusion' (since 2026 also at IONOS Group: 'Belonging & Inclusion') e-learning course. It consists of several modules, including one focusing on inclusion and (dis)ability awareness. Topics covered include:

- Understanding terms such as 'disability' and 'neurodiversity'
- Visible and invisible limitations
- Legal framework
- Tips for creating an inclusive workplace (e.g. digital accessibility)

Further modules cover topics such as practicing diversity, unconscious bias, the AGG and sensitive language. By the end of 2025, 89 % of the employees who had registered for the course had completed the e-learning.

In addition, a virtual information session on 'Inclusion in the Workplace' was offered to HR staff at the end of 2024 and beginning of 2025 – led by the Group's Contact Person for Inclusion and the in-house employment lawyer.

Established reporting channels

United Internet provides all staff with confidential points of contact – both in person and online. These include:

- Confidential advisers (see the 'Support' chapter)
- Compliance managers
- The Integrity Line electronic whistleblowing system

These points of contact are intended for reporting breaches of labor and human rights, as well as discrimination, unfair treatment, harassment or bullying. Every report is taken seriously. Where cases are confirmed, we take targeted measures to remedy the situation.

Since 2024, the reporting channels have been better integrated. A regular meeting brings together the confidential advisers, the Group contact person for inclusion, Corporate Compliance, the heads of Corporate Health, Diversity & People Experience, and HR management. In addition, HR staff have been trained in complaint and reporting management, with a focus on the General Equal Treatment Act (AGG).

Internal structures for occupational health and safety

Existing structures, such as occupational health and safety committee meetings, regular risk assessments and site inspections, ensure compliance with health and safety standards. Where necessary, specialists from the Corporate Health, Diversity & People Experience department, company doctors, psychologists or external partners (e.g. occupational safety specialists) are involved in taking individual requirements into account and ensuring a safe working environment.

External partnerships and social engagement

We maintain a long-standing partnership with recycling specialist AfB, which makes valuable contributions to the employment of people with physical or mental disabilities. Our collaboration on the recycling of IT hardware creates social value and has a positive impact on society.

Furthermore, since 2006, United Internet has been supporting the goals of the United Nations Children's Fund through its own foundation 'United Internet for UNICEF'. To date, over 75 million euros have been raised to help children in crisis and war zones worldwide – including vulnerable children with disabilities, such as those in Ukraine.

Our objectives for 2030

- ☐ **Establish a project structure for implementation**
Under the leadership of the Group Contact Person for Inclusion, we are developing a project structure to implement the action plan.
- ☐ **Establish a progress report with key performance indicators**
We are creating a standardized reporting format with clear key performance indicators to measure success in line with the structure of the action plan.
- ☐ **Integrate inclusion metrics into employee surveys**
To measure success, we are including at least one question on the topic of inclusion in the decentralized employee surveys across all segments.

❑ **Further develop the remote working policy to ensure inclusivity**

We will draw up a decision paper to expand the internal remote working policy – with a focus on the needs of employees with disabilities and neurodivergent colleagues.

❑ **Make partnerships more visible internally**

In future, we would like to make our partnerships more visible internally as well – for example, through visits, joint workshops and exchange forums with staff.

❑ **Expand participation in inclusive networks**

We aim to play an active role in at least one inclusive network within the business community or civil society, to learn about best practices and gain inspiration for our inclusion work.

3.2 Awareness and competence

Awareness and competence are key prerequisites for an inclusive corporate culture. This area of action encompasses measures to raise awareness, provide training and strengthen inclusion competence amongst employees and managers.

What we are already doing

The Key Inclusion Assessment 2025 made it clear that United Internet is already above the industry average in this area (see p. 7). Our existing awareness-raising measures and learning programmes contribute significantly to this.

Safe Space Network

A safe space network is in place for affected employees, offering a space for dialogue, mutual support and confidential discussions. The bi-monthly virtual meetings are moderated by the Group Contact Person for Inclusion and promote participation and respectful cooperation.

Capacity Building for HR and Inclusion Lead

The Group Contact Person for Inclusion has completed targeted training courses to further develop their professional expertise. An e-learning programme on diversity & inclusion for HR is currently being developed in collaboration with them. The focus is on inclusion throughout the employee lifecycle – from recruitment through onboarding to succession planning. The e-learning programme will be available group-wide to all HR colleagues from 2026 and is designed to specifically empower them to shape work processes in an inclusive manner.

Awareness initiatives: Diversity Days & Diversity Talks

Since 2021, we have been organizing the annual Diversity Days – a multi-day in-house conference featuring presentations, panel discussions and workshops on diversity, inclusion and belonging. The events are

predominantly virtual and designed by staff for staff. With around 1,900 participants and 43 speakers in 2025, Diversity Days are a key driver of awareness and change.

Contributions on the topic of inclusion are an integral part of the programme – including personal first-hand accounts and practical tips such as:

- ‘Accessibility in the IONOS new customer shop’ (2021)
- ‘My everyday (working) life as a blind person – how technology has changed it’ (2022)
- ‘Mask on, mask off – a diagnosis on the autism spectrum’ (2023)
- ‘Accessibility – why I care... and so will you’ (2024)
- ‘Let’s talk about disability – should I mention it or not?’ (2025)

In addition, through our Diversity Talks, we offer virtual talks and workshops with external speakers throughout the year. At least once a year, the focus is on disability, accessibility and inclusion. Examples:

- ‘Awareness Power Session: Disability, impairment and accessibility’ (2023)
- ‘Sign language’ and ‘Communicating with people who stammer’ (2024)
- ‘Neurodiversity and AI’ (2025)

Diversity information platform on the intranet

To raise the profile of inclusion, we regularly publish articles on the intranet. Content includes, amongst other things, awareness days (e.g. ‘White Cane Day’), employee profiles and practical tips for an inclusive working day.

In addition, our intranet offers an information platform with topic-specific pages that provide relevant content. One example is the ‘Should I say it or not?’ page, which provides guidance on disclosing a disability and supports an open culture of communication free from fear of discrimination.

We are currently developing targeted information guides for managers. The first guide focuses on the topic of neurodiversity and will be made available via the digital management platform.

Our objectives for 2030

- ❑ **Provide practical guides for managers**
We are producing practical guides to help managers better understand and provide targeted support for neurodivergent staff and staff with disabilities.
- ❑ **Systematically expand the information platform**
We are updating and expanding our existing information platform with clearly structured content on inclusion, accessibility and support services. The aim is to provide an easily accessible, central source of information for all staff.

☐ **Design inclusive onboarding materials**

We are expanding the documentation for new staff to include information on inclusion services, points of contact and guidelines. This is intended to ensure that support is clearly recognizable and accessible right from the start.

☐ **Establish a communication plan for inclusion**

We are developing and implementing a communication plan that provides regular updates on the strategy, objectives and progress of our inclusion work.

☐ **Launch an awareness campaign on invisible disabilities**

We are running an internal information campaign that uses stories, infographics and expert interviews to raise awareness of mental health conditions and other invisible disabilities.

☐ **Integrate diversity and inclusion into management formats**

We regularly address the topic of diversity and inclusion in management meetings and all-hands sessions to raise awareness and build knowledge among managers and staff.

☐ **Establish a network for neurodivergent employees**

We are launching an internal network for neurodivergent employees and their allies. The aim is to facilitate exchange, provide peer support and involve members in the further development of internal company initiatives.

3.3 Accessibility

Accessibility means designing physical, digital and communicative access in such a way that it can be used by everyone – regardless of individual limitations. In this area of focus, we are working to systematically identify and remove barriers.

3.3.1 Physical Accessibility

The Key Inclusion Assessment has shown that we still have significant room for improvement when it comes to architectural accessibility.

What we are already doing

Individual adjustments and arrangements

We are already committed to ensuring that the employment of people with disabilities is not hindered by architectural or technical barriers. We create accessible workplaces, usually through technical retrofitting, to compensate for or reduce existing barriers. Where necessary, this is carried out in consultation with the manager of the person concerned, the relevant HR contacts and our Corporate Real Estate Management (CREM) team. Where required, the Group contact for inclusion and other internal specialist departments, as well as external partners, are consulted for advice.

New Builds and Refits

For new builds, refits and extensions, we take the needs of employees with disabilities into account on a needs-based basis right from the planning phase. Our aim is to implement the applicable accessibility standards and minimize restrictions.

Analysis of the Current State of Building Accessibility

In 2025, we set up a working group and carried out a comprehensive internal analysis of all sites to assess the state of architectural accessibility. The aim was to identify specific areas for action and determine where retrofitting was required. This includes structural and technical measures such as ramps, automatic door openers, and visual and auditory guidance systems. The result: structural accessibility is generally in place at many sites. Some measures, such as voice announcements in lifts, have been implemented at many sites (where this was feasible for us). Further development is planned. At most sites, a lift from the underground car park to the office areas ensures access for staff and visitors with mobility impairments. In addition, dedicated disabled parking spaces are available to facilitate accessibility. Our staff canteens and social areas are also accessible, enabling most employees to participate equally in breaks and social interactions.

Ergonomic workstation equipment

In new builds and refurbishments, we ensure that height-adjustable desks are used as required. In addition, bespoke solutions are already available today, such as specialized workstation equipment or technical aids for staff with specific needs.

Relaxation rooms

Furthermore, relaxation rooms are available at some sites, offering staff a place to retreat.

External venues

We ensure that in-person corporate events, such as our summer party, take place at accessible venues. For example, people with reduced mobility can make use of a table service provided by the caterer.

Our objectives for 2030

- ☐ **Develop a standard approach to accessibility**
We are drawing up valid minimum requirements to be applied, as appropriate, to ensure architectural accessibility in new builds and refurbishments.
- ☐ **Promote skills development in CREM**
We are establishing needs-based and situation-specific (e.g. as part of site projects) forums for dialogue to raise awareness of the need to consider the concerns of affected individuals in architectural accessibility.
- ☐ **Systematically involve affected staff**
We aim to involve affected employees in a needs-based manner, in internal processes and in building works that affect the workplace environment.
- ☐ **Establish a process for individual workplace adaptations**
We are defining a Group-wide process for individual structural adaptations to safeguard the employment of employees with disabilities.
- ☐ **Actively utilize funding opportunities**
We seek regular dialogue with integration offices to make targeted use of funding for accessible workplace design and employment retention grants.
- ☐ **Technical retrofitting for greater safety**
In consultation with property owners, we are assessing where lifts can be retrofitted with voice announcements and at which relevant locations emergency call systems should be installed in accessible toilets.
- ☐ **Design inclusive evacuation procedures**
We are exploring the possibilities of a needs-based alarm and evacuation system for people with disabilities, which is to be designed in a practical and site-specific manner.
- ☐ **Implement standardized signage for accessible entrances**
In consultation with property owners, we are introducing, where possible, standardized and clearly visible signage (e.g. using tactile Braille stickers) for accessible entrances.
- ☐ **Clearly label accessibility restrictions**
We plan to clearly and visibly indicate any limited accessibility in listed buildings.
- ☐ **Provide a clear overview of site accessibility**
We will provide an overview on the intranet of accessible facilities at all sites – such as wheelchair access, toilet facilities, lifts and car parks.

☐ **Introducing a feedback system for accessibility issues**

We will introduce a dedicated category for structural accessibility within the existing ticketing system (reporting channel), so that feedback can be recorded and addressed in a targeted manner in future.

☐ **Provide a checklist for external venues**

We are developing a checklist to assist with the selection of accessible external venues and to help organize events with minimal barriers. We will make this available to event organizers.

☐ **Set up quiet rooms at all sites**

We are creating quiet rooms at all sites where sufficient space is available, offering staff a place to retreat to.

3.3.2 Digital accessibility

The Key Inclusion Assessment 2025 has shown that United Internet still has significant room for improvement when it comes to digital accessibility.

What we are already doing

We recognize digital accessibility not only as a means of supporting people with disabilities, but also as a contribution to overall user-friendliness. Clear structures, simple navigation and easily readable content benefit everyone.

We are already implementing various measures:

- On the intranet, we provide an information page with recommendations on digital accessibility.
- Digital accessibility is already an integral part of our software release process.
- Our platforms are equipped with screen reader compatibility, contrast modes and simple navigation.
- We use software solutions that read content aloud or adapt it visually – helpful for people with visual impairments or learning difficulties.
- For technical requirements relating to digital accessibility, the IT Service is on hand to advise and support all staff. We are happy to take individual needs on board and work together to find suitable solutions.
- Alt text for images and accessibility plug-ins are largely in place.
- Our United Internet AG careers page meets key requirements: it supports screen readers, offers sufficient contrast and allows navigation via the keyboard.

Our objectives for 2030

- ❑ **Define minimum standards for digital accessibility**
We are examining how binding minimum standards for digital accessibility can be incorporated into new IT solutions and software rollouts.
- ❑ **Provide a transparent overview of the tools in use**
We will draw up an overview of the accessibility of all tools and software solutions in use and make this available on the intranet.
- ❑ **Provide targeted support for the procurement of assistive technology**
We offer targeted support in the selection and procurement of suitable digital assistive technology – in close cooperation with integration offices and specialist services. A point of contact within the IT department will be designated.
- ❑ **Develop and provide accessible learning resources**
We will define minimum standards for accessible e-learning and learning resources that are accessible to all staff.

3.4 Recruitment and Support

Inclusive recruitment and appropriate support services are crucial to attracting people with disabilities and neurodivergent individuals to our company and supporting their long-term development. This area of focus encompasses measures covering the entire employee lifecycle – from the application stage through to individual support in day-to-day working life.

3.4.1 Recruitment

The Key Inclusion Assessment 2025 shows that we are currently performing at a solid average level in the areas of recruitment and support. At the same time, there is potential to make our processes more inclusive and take greater account of neurodiversity.

What we are already doing

- Our job advertisements are gender-neutral and do not contain any discriminatory requirements.
- In all job advertisements, we actively reach out to people with disabilities through our diversity statements:

“Diversity enriches. Different cultures, nationalities, genders, age groups, sexual orientations and religions, as well as people with disabilities – we value diversity and promote it. Because only teams that reflect all facets of society offer the best conditions for creativity and make a company productive and distinctive. We value diversity and welcome all applications.” (United Internet AG, 1&1, Mail & Media)

“We value diversity and welcome all applications – regardless of, for example, gender, nationality, ethnic and social background, religion, disability, age, sexual orientation and identity, physical characteristics, marital status or any other irrelevant criterion under applicable law.” (IONOS)

- Training on bias-free and inclusive recruitment has already been carried out in individual segments.
- Where necessary, we ensure individual workplace adjustments – in collaboration with CREM, IT, HR and the Group Contact Person for Inclusion.
- Disclosing a severe disability is voluntary when applying.

Our objectives for 2030

☐ **Targeted efforts to enhance visibility and engagement**

We are making our careers pages more inclusive – through accessible technology, inclusive imagery and targeted outreach to people with disabilities and neurodivergent talent.

☐ **Explore partnerships with specialized platforms**

We are evaluating partnerships with specialized job and talent platforms and ensuring our exhibition stands are accessible, so that we can specifically reach out to people with disabilities.

☐ **Leverage best practices through industry collaboration**

We are networking with other IT companies that run programmes for neurodivergent talent.

☐ **Strengthen inclusion in apprenticeships**

We are assessing how we can work with trainers and partners to integrate inclusion more effectively into our apprenticeship programmes – from recruitment right through to the final examination – including through individual support and awareness-raising, so that we can provide young people with the best possible support throughout their training.

3.4.2 Support

An inclusive working environment requires more than just accessible processes – it requires reliable support services that promote health, wellbeing and participation. This area of action encompasses measures that support staff facing challenging life situations and take individual needs into account.

What we are already doing

BEM process (Workplace Integration Management)

Employees who have been unable to work for more than six weeks at a time or on repeated occasions within a year receive individual support through the BEM process. The aim is to work together to find solutions to restore the ability to work and maintain good health in the long term. Participation is voluntary and confidential. The process is managed by our HR Business Partners.

Workplace health initiatives and healthy eating

Our in-house health programme addresses both physical and mental well-being. It includes, amongst other things, health campaigns, preventive healthcare services, vaccination programmes, first-aid courses, exercise programmes and training on stress prevention and mindfulness.

In our employee restaurants, we ensure a balanced diet, and free fruit is available at all sites.

Through our annual Health Days, we shine a spotlight on health – with talks, check-ups and information stands. Since 2023, personal testimonials have been added to the programme, fostering open dialogue on taboo topics such as chronic illnesses or disabilities.

A comprehensive information page on the intranet provides guidance and lists internal and external points of contact in crisis situations.

Employee Assistance Programme (EAP)

In cooperation with an external EAP partner, we offer free psychological counselling, preventative health support and assistance in finding therapy places. The service is confidential and easily accessible.

Mental Health First Aiders

Since 2024, a pool of specially trained colleagues has been available as first points of contact for mental health concerns. They recognize signs at an early stage, offer confidential conversations and help assess the need for further support.

United Internet Trusted Persons

Our Trusted Persons are neutral points of contact for personal or professional concerns. The service is voluntary, free of charge and guarantees absolute confidentiality. The aim is to create a supportive environment in which concerns can be openly discussed.

Group Contact Person for Inclusion

Since 2023, a Group Contact Person for Inclusion has been available to provide support with individual concerns, acting as a central point of contact between those affected, staff, management and senior executives, as well as external partners. In addition to providing advice and raising awareness, they ensure the strategic direction is maintained, for example through project management.

Our objectives for 2030

☐ **Establish inclusion officers in segments**

We are examining the possibility of supplementing the role of the Group Contact Person for Inclusion with designated inclusion officers in all segments subject to co-determination.

☐ **Embed inclusion in staff appraisals**

We are examining how inclusion and individual needs can be given greater consideration in the guidelines for regular staff appraisals.

☐ **Review support services for further training**

We are evaluating the possibility of providing support services for further training where required – e.g. sign language interpreting or technical aids.

☐ **Review benefits for accessibility**

We are systematically reviewing our existing Group benefits for accessibility and availability and will adjust where necessary.

Legal framework for the employment and support of people with severe disabilities

(Supplementary to the Inclusion Action Plan – in accordance with SGB IX)

Staffing and employment obligations

- Companies with an average of at least 20 posts are obliged to fill at least 5 % of their posts with people with severe disabilities, including on a part-time basis where appropriate (Sections 154, 164 V of SGB IX).
- Particular consideration must be given to women with severe disabilities (Section 154(1) of SGB IX).
- When filling vacant posts, consideration must be given to whether applicants with severe disabilities can be considered (Section 164 SGB IX).
- The representative body for people with severe disabilities must be informed at an early stage, involved in the selection process and granted access to the application documents (Section 178 SGB IX).
- Examination adjustments may be made to compensate for disadvantages in selection procedures (Section 5 BLV).

Holiday entitlement

- Employees with severe disabilities are entitled to five additional days' holiday per year on a five-day working week (Section 208 SGB IX).
- In the case of different working time arrangements, the additional holiday entitlement is adjusted on a pro rata basis.
- If the status of severely disabled does not apply for the whole year, the additional leave is calculated on a pro rata basis.
- The additional leave is added to the regular annual leave and may also be claimed in the event of a retrospective determination.

Termination of employment

- Any dismissal of employees with severe disabilities requires the prior consent of the Integration Office (Section 168 of SGB IX).
- Once consent has been granted, the notice of dismissal must be given within one month (Section 171 of SGB IX).
- The representative body for employees with severe disabilities must be consulted prior to any dismissal (Section 178 of SGB IX).
- Before terminating an employment contract on health grounds, it must be assessed whether continued employment is possible through measures such as the BEM (Section 167 of SGB IX).
- The requirement for approval by the Integration Office also applies in the case of extraordinary dismissal; the application must be submitted within two weeks (Section 174 of SGB IX).
- In the event of reduced earning capacity, the approval of the Integration Office is also required (Section 175 of SGB IX).
- There is no protection against dismissal during the first six months – nevertheless, the Integration Office must be informed (Section 173 of SGB IX).

4 GLOSSARY

Chronic Illness

Chronic illnesses are long-term or permanent health conditions that typically persist for months or years. They may have physical or psychological causes and often require ongoing treatment or adjustments in daily life. Examples include diabetes, cardiovascular diseases, and autoimmune disorders.

Degree of Disability and Equal Status

The Degree of Disability (GdB) is a classification used in Germany to indicate the extent to which a health impairment affects a person's participation in society. It is assessed in increments of ten, starting at 20 and ranging up to 100, and serves as the basis for certain legal protections and compensatory measures. Individuals with a GdB of at least 50 are considered severely disabled. People with a GdB of 30 or 40 may apply for equal status (*Gleichstellung*), which grants them rights similar to those of severely disabled individuals, particularly in the workplace.

Disability

A disability may involve physical, intellectual, mental, or sensory impairment. It may be temporary or permanent. A person is considered disabled when this impairment, together with barriers, limits their equal participation in society. It is important to understand that the barriers in the environment, structures, and attitudes are the challenge—not the person.

Inclusion

Inclusion means that all people can participate equally, regardless of their abilities, background, or other characteristics. To achieve this, barriers in the environment, structures, and attitudes must be identified and removed. The goal is to create an environment in which diversity is valued as a matter of course and no one is excluded.

Intersectionality

Intersectionality describes the interaction of different dimensions of diversity, such as disability, gender, ethnic background, or sexual orientation. It highlights that people may experience multiple disadvantages when several of these dimensions overlap. An intersectional perspective helps us better understand individual lived experiences and respond more effectively to different needs.

Neurodiversity and Neurodivergence

Neurodiversity describes the natural variation in human ways of thinking, learning, and perceiving the world. Neurodivergence refers to differences in perception, information processing, or behavior that diverge from what is considered a neurotypical norm. Examples include autism spectrum conditions, ADHD, dyslexia, and Tourette syndrome. Neurodivergent people may have different needs and bring diverse perspectives and strengths.