

NFON GROUP | SUSTAINABILITY REPORT 2023

Transformation. Integration. Implementation.

NFON AG

Sustainability report 2023

Who we are

With its headquarters in Munich, Germany, **NFON AG** is a leading European provider of integrated cloud business communications. The listed company (Frankfurt Stock Exchange, Prime Standard) with more than 3,000 partners in 18 European countries and eight branches counts more than 55,000 companies among its customers.

The NFON portfolio comprises four areas: Business Communication, Integration, Customer Contact and Enablement. With its core product Cloudya, the smart cloud communications platform, NFON offers hassle-free voice calls, simple video conferencing and seamless integration of CRM and collaboration tools for small and medium-sized companies.

All NFON's cloud services are operated in certified data centres in Germany, with 100% of their energy needs covered by renewable sources. NFON accompanies companies into the future of business communication by offering intuitive communication solutions.

CORPORATE.NFON.COM/EN

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NFON PRODUCT AREAS

Business Communication

-  Cloudya (cloud telephony)
- Meet & Share (video calls and screen sharing)

Integration

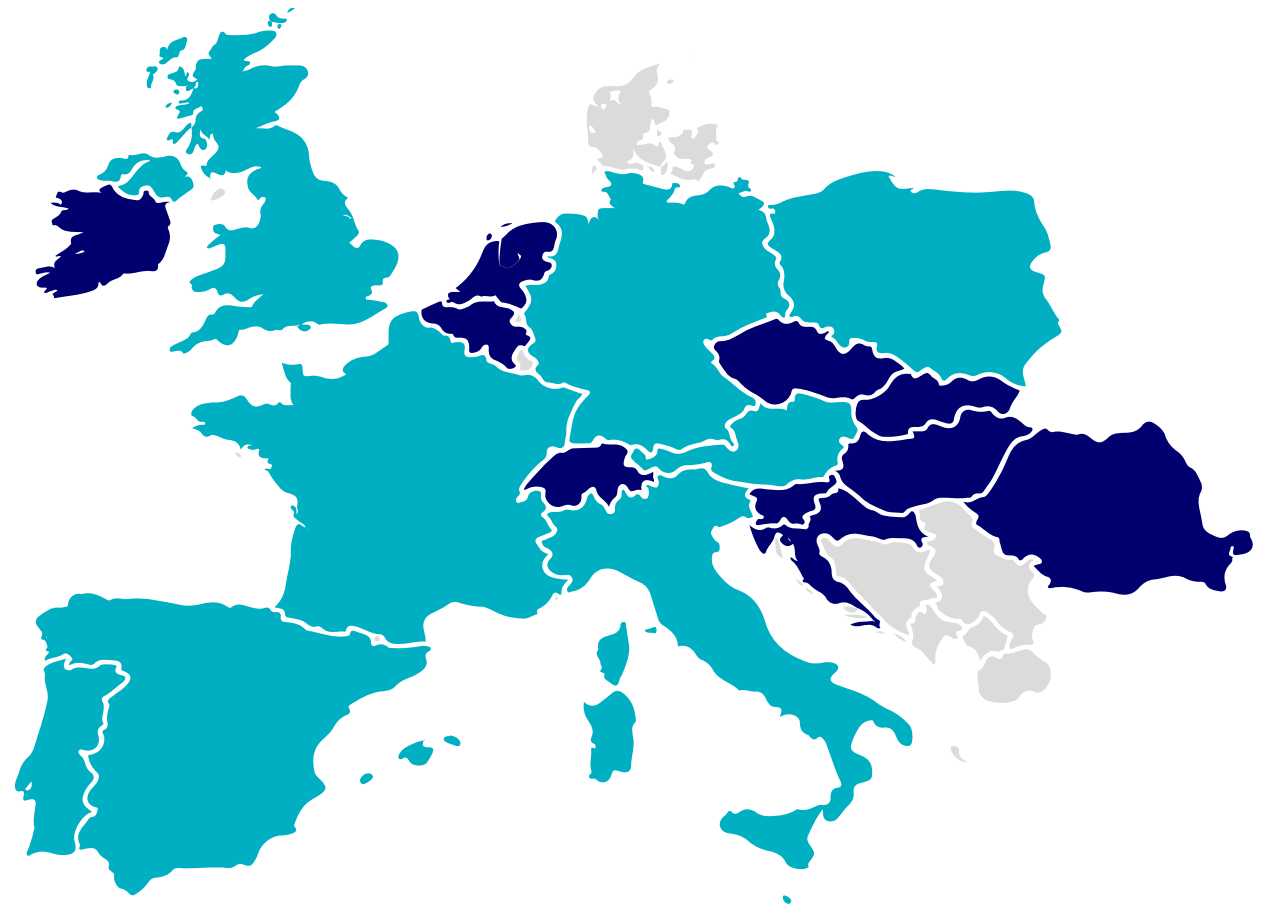
- CRM Connect
- NCTI (Standard, Premium and Pro)
- NFON Integration for Microsoft Teams (Premium and Standard)
- ASC Recording Insights for Microsoft Teams (UK only)

Customer Contact

- Contact Centre Hub
- Nmonitoring Queues
- Neorecording
- Noperatorpanel
- Nhospitality

Enablement

- Nconnect Voice (SIP trunk)
- Nconnect Data (Germany only)



Every day, we provide companies in Europe with intuitive communication solutions to improve their business operations.

The Group operates as a telecommunications company in 18 European countries and is represented by its own companies in Germany, Austria, the UK, Spain, Italy, France, Poland and Portugal.



-  NFON activities with a local presence
-  NFON activities without a local presence

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01 About this report

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ABOUT THIS REPORT

⊕ For more information on the subject of sustainability, please visit corporate.nfon.com.

Reporting framework and content

The sustainability report of the NFON Group 2023 presents our annual performance in the area of sustainability for the financial year and can be found at [⊕ corporate.nfon.com/en/sustainability/reports](https://corporate.nfon.com/en/sustainability/reports). The report is available in German and English. In the event of any discrepancies, the German version is binding.

Basic information on the presentation

The sustainability report of the NFON Group (hereinafter: “we”, “NFON”, “the company”, “the Group”, “the NFON Group”) and NFON-Aktiengesellschaft (NFON AG) is essentially also an accountability report to our stakeholders. The report is published in parallel with and in relation to the combined [⊕ group management report](#), the consolidated financial statements and the notes to the consolidated financial statements, the group corporate governance statement, the remuneration report and the report to the Supervisory Board. We do not repeat contents that is already presented and discussed in other reports, but instead make reference to it in this sustainability report. To keep the report as up to date as possible, we have included all relevant information that was available up to 18 April 2024.

Constant development of our sustainability reporting

We have expanded our internal and external sustainability reporting as part of our sustainability performance. We are endeavouring to continually expand the sustainability information that is available. NFON published a sustainability report for the first time in the 2021 annual report. In 2023, we published an additional report in the form of the non-financial statement (section 289c (3) of the Handelsgesetzbuch (HGB) – German Commercial Code) together with the 2022 annual report; this statement was not reviewed by the auditors. We plan to report on the progress we are making on sustainability issues every year. And starting from 2026, we plan to present our sustainability reporting for the preceding financial year in accordance with the requirements of the Corpo-

rate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). This report will be subjected to an external audit with reasonable assurance conducted by a public auditor for the first time. We have selected performance indicators on the basis of relevant standards or laws. These include the Global Reporting Initiative (GRI), the requirements of the German CSR Directive Implementation Act, the ESRS and the UN’s 17 Sustainable Development Goals.

Properly functioning interactions between NFON and the central stakeholders are essential for our business success. For this reason, we selected the contents of this sustainability report not only from NFON’s own point of view but equally from the perspective of (what we believe to be) the interests of our key stakeholders. We embarked on our journey of transition back in 2023 when we initiated our [⊕ materiality assessment](#) in accordance with the principle of double materiality. We also validate what we believe to be the interests of our key stakeholders in this way.

The report largely relates to the entire NFON Group. We explicitly explain any matters that relate only to certain countries or subsidiaries.

Consolidation

Unless otherwise stated, all information in this report relates to 31 December 2023 or the financial year that ends on this date. The underlying data basis for the NFON Group's non-financial key performance indicators essentially corresponds to the scope of consolidation used in the financial reporting. We point out where any different information is included.

Facts and figures

Unless otherwise indicated, the measures that are presented in relation to the relevant aspects are ongoing. The rounding of totals and the calculation of percentages in this report may give rise to minor discrepancies. We continue to work on consistently enhancing the quality of our data. To better measure our sustainability performance, we have therefore expanded the data that we collect on emissions, for example. All greenhouse gas datapoints are collected on the basis of the Greenhouse Gas Protocol.

Certain information and data has been excluded from this report in accordance with our internal policies and legal requirements in order to minimise potential risks relating to intellectual property and confidential information.

Threshold for adjustments

Where adjustments are made to financial indicators, we follow the annual financial statements. Where adjustments are made to ESG data (environment, social, governance), we decide at our own discretion whether we have to adjust these figures. We indicate clearly where we have adjusted any data.

Forward-looking statements

This report contains forward-looking statements and information that are based on the opinions and assumptions of the management. These are based in turn on the information that is currently available to the management. All statements contained in this report that are not historical facts are forward-looking statements. These forward-looking statements are the result of our current expectations, assumptions and forecasts concerning future circumstances and events. Consequently, these forward-looking statements and information are subject to a range of risks and uncertainties, many of which are beyond our control. If one or more of these risks and uncertainties occur or if the assumptions made by the management prove to be incorrect, our actual results could differ substantially from the expectations described in or derived from the forward-looking statements and information. The relevant risks and uncertainties are described in the "Opportunities and risk management" and "Risks of the NFON Group" sections of the [annual report](#).

Words such as “expect”, “believe”, “anticipate”, “continue”, “estimate”, “forecast”, “intend”, “be confident”, “assume”, “plan”, “predict”, “should”, “strategy”, “may”, “could”, “will”, “outlook”, “expected development” and “goals” as well as similar expressions relating to NFON indicate these types of forward-looking statements.

The forward-looking statements reflect the viewpoint at the time they were made or as at the date of this report. We recommend that readers do not place undue trust in these statements. Apart from our legal disclosure requirements, we are under no obligation to the public to update or correct forward-looking statements due to new information or circumstances arising after the date of publication, future events or for other reasons.

This report contains statistical data taken from publications from various information sources. NFON bears no responsibility for the statistical data contained in this report. Furthermore, this type of data is subject to risks and inaccuracies and may change as a result of various factors, including the factors described above or those described in the “Opportunity and risk management” and “Risks of the NFON Group” sections of the [📄 annual report](#). These and other factors could cause our results to deviate substantially from those estimated by third parties and from the results reported by NFON.

External audit

We have produced this report on a voluntary basis. There is as yet no plan to have it audited by a public auditor. In addition, the report is submitted to the Management Board in line with the reporting structure. We plan to commission a public auditor to conduct an external audit with reasonable assurance for the first time for the 2026 report on the 2025 reporting year.

02 To our stakeholders

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TO OUR STAKEHOLDERS

Message from the Chairman of the Management Board

Dear stakeholders

I am delighted to be able to present the 2023 sustainability report to you. The past financial year was characterised by the start of the transformation at NFON AG. Building on the foundation of operational excellence, we will also implement this transformation with greater success in the 2024 reporting year. In this way we will ensure that we can continue to grow sustainably and successfully in the future. As a leading provider of integrated cloud business communication, we are not only pursuing sustainable economic success, but also aiming to make a positive contribution to the benefit of society and the environment.

Cloud technology offers companies enormous opportunities, and not just in these times of the home office and new work concepts. It enables us to design communication that is flexible and decentralised, which not only optimises workflows, but can also play a role in deploying resources more efficiently. Our goal is to implement effective sustainability management and to create an organisation that integrates sustainable actions seamlessly in business processes.

Patrik Heider
Chairman of the
Management Board



In this report, we present to you the initiatives we launched and the success we enjoyed in the area of sustainability over the past financial year. We show how we are making our contribution to a more sustainable (business) world. Let us join together not only to protect the interests of our generation today, but also to meet the needs of the generations that will follow us tomorrow.

I thank you for your trust and your support on our journey and look forward to continuing our successful co-operation in the future.

Yours faithfully

Patrik Heider
Chairman of the Management Board

Comment from the sustainability team

Dear stakeholders

Looking back, we can see that we have completed a year of transformation in the area of sustainability at NFON. In 2023, we asked critical questions and took our first resolute steps, restructuring our sustainability organisation and further developing our sustainability management for example. One of the aspects we focused on in this process involved initiating our CSRD-compliant double materiality assessment, including the stakeholder mapping and engagement. We are about to embark on our sustainability journey and are full of determination to pursue this path consistently.

The task now is to establish strong sustainability management and to integrate it in our actions. To this end, we will develop a comprehensive sustainability strategy for NFON that includes a path to decarbonisation, prepare the voluntary reporting on the EU Taxonomy and work on producing and implementing missing guidelines as well as on many other topics.

Friederike Thyssen
VP Investor Relations &
Sustainability



By formalising our sustainability strategy, we can continue to integrate these in our core businesses and implement key initiatives that form the cornerstone for the development of future programmes.

Only together can we successfully tackle the challenges of sustainability, and I am excited to see what we can all achieve together.

Warmest regards

Friederike Thyssen
VP Investor Relations & Sustainability

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Basic information on the Group

Business purpose and model

Founded in 2007, NFON is a leading provider of integrated cloud business communications. With its Group management based in Munich, NFON employs around 450 people. The NFON customer base includes more than 55,000 companies. The Group operates as a telecommunications company in 18 European countries and is represented by its own companies in Germany, Austria, the UK, Spain, Italy, France, Poland and Portugal. NFON also has a large network of more than 3,000 partners that handle the majority of our sales. NFON can provide local telephone numbers in over 50 countries that can be integrated into the cloud telephony system.

The NFON Group has been a full local exchange carrier in Germany since 2023, which reduces its reliance on suppliers and allows it to act independently and with much greater speed and flexibility in customer projects. In addition, we have successfully completed important certification procedures such as BSI C5, ISO 9001, ISO 27001 and the Telekom Privacy and Security Assessment, which are documented in detail in the [Trust Center](#) on our company website.

More information can be found in the "Group structure", "Management and control" and "Management of key performance indicators" sections in the [annual report](#).

More information and basic facts about our Group can be found in the [annual report](#)

Business processes and inputs

NFON VALUE CHAIN



Our value chain

Our value chain is geared towards building a sustainable and long-term partnership with our customers and partners while making a positive contribution to society at the same time.

The services we receive from our various suppliers include voice minutes, data centre services, telephone numbers, training and hardware. Thanks to our internal resources and processes within units such as People & Culture, Finance, Controlling, Marketing, Product Management, Service and Support, Order Processing, Procurement, Sales and Research and Development, we are able to develop high-quality services and solutions that our partners sell to our customers.

We endeavour to create added value for partners and customers by providing reliable and innovative solutions that provide them with support in achieving their goals. These include in particular solutions such as unified communications as a service (UCaaS) and contact centre as a service (CCaaS) as well as marketing and support services.

Products and services

NFON generates most of its revenue by providing cloud-based telecommunication services to business customers. Cloudya, NFON's core product, is a platform that offers easy-to-use, independent and reliable business communications for companies. NFON is also expanding its product portfolio in the areas of unified communications and collaboration, such as Meet & Share, Integration for Microsoft Teams (MS Teams) and business applications. NFON distinguishes between recurring and non-recurring revenue.

Recurring revenue includes monthly fees for all products and solutions as well as ongoing call charges and monthly symmetric digital subscriber line (SDSL) fees. Non-recurring revenue is one-time revenue from the sale of hardware, set-up fees for the cloud PBX and other products, such as contact centre hub, set-up fees for SDSL or consulting services. No significant changes were made to our product/service portfolio in the reporting period. Further information on our product areas can be found in the [annual report](#).

More information on our product areas can be found in the [annual report](#)

Procurement and sales markets

Information on our procurement and sales markets can be found in the sections on “General market situation” and “General economic conditions and industry environment” in the [annual report](#). No significant changes were made in relation to our most important markets or customer groups in the reporting period.

Explanation of influential/relevant sustainability issues for the business

Digitalisation can play a major role in boosting sustainability in society. This relates both to climate protection targets and equality and diversity targets. A study published by Bitkom in 2022¹ found that digitalisation is already playing a major role today and will become even more important in the future: “Every company that follows a specific sustainability strategy (52%) or plans to follow one (37%) is integrating digital technologies into this strategy. A quarter (24%) even say that digital technologies are vital for meeting sustainability targets. They are of “considerable importance” to 27% and “of relatively high importance” to 42% of the companies – so they are relevant to 93% of these companies in total.”² Asked which specific technologies can contribute to improved sustainability and climate protection, 71% of respondents mention cloud computing.

More information on our markets, our strategy and our goals can be found in the [annual report](#)

Companies recognise that operating servers, storage and applications at a large data centre is generally more efficient than operating this infrastructure locally at each individual company. 47% of the companies also highlighted the potential of video conferences, for example to avoid business travel or commuting. At NFFON, however, we believe our role here is about more than just providing cloud-based communication services: we also think we can help conserve valuable resources by “dematerialising” products and moving them to the virtual world.³ customers who use cloud services for their communications do not require their own servers and telephones,⁴ and so reduce the amount of waste produced. Through our products and services, we help companies and employees communicate with each other efficiently and provide better services to their customers. By continually developing the platform and services, we are helping to constantly optimise and expand the range of communication channels and to boost efficiency.

Strategy and goals

Information on our strategy and goals can be found in the section on “Strategy and goals” in the [annual report](#).

¹ <https://www.bitkom.org/Presse/Presseinformation/Digitalisierung-und-Klimaschutz-in-Wirtschaft-2022>

² https://bitkom-akademie.de/news/wirtschaft-sieht-digitalisierung-chancen-fuer-den-klimaschutz?https://bitkom-akademie.de/?mtm_campaign=transformation&gclid=CjwKCAiAq4KuBhA6EiwArMAwLJ-wAM-pMqV-T3Sh7i2hPrjAcDIH8Rrs1f2slPhMgPLcWPTePvS-hoCTJEQAVD_BwE

³ https://www.haufe.de/sustainability/strategie/nachhaltigkeit-und-digitalisierung-chancen-und-konflikte_575772_581302.htm

⁴ <https://de.statista.com/statistik/daten/studie/186330/umfrage/anzahl-der-telefonan-schluesse-im-festnetz-weltweit-seit-2000/>

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Sustainability management

Governance and organisation

We will continue to develop our sustainability management and our sustainability organisation in 2024. Part of this will also involve subjecting the sustainability strategy and the accompanying goals to a review. This will be carried out in line with the revision of our sustainability strategy. The goal here is to embed the sustainability strategy as an integral element of the NFON corporate strategy.

Our sustainability management is integrated in our organisational structure vertically, horizontally and on a cross-functional basis. The high priority that is given to sustainability and the importance of climate protection in particular here is reflected in our sustainability organisation. Responsibility for the issues in the area of sustainability – and thus, looking forward, for climate-related opportunities and risks⁵ – lies with the Chief Sustainability Officer and forms part of the tasks performed by the core sustainability team. This mandate is exercised by the Chairman of the Management Board (CEO) of NFON AG. The perspective of the Chief Sustainability Officers is thus incorporated in a major, central role in all important Group decisions. In his dual function, the CEO plays a key part in the development of the corporate and sustainability strategy also when it comes to climate-related decisions. A central element is the sustainable transformation of NFON, in the course of which all products, services and operating processes will be gradually designed in a more sustainable way. In the future, the Management Board and the Supervisory Board will define the climate goals for NFON.

⊕ More information on remuneration can be found in the [annual report](#)

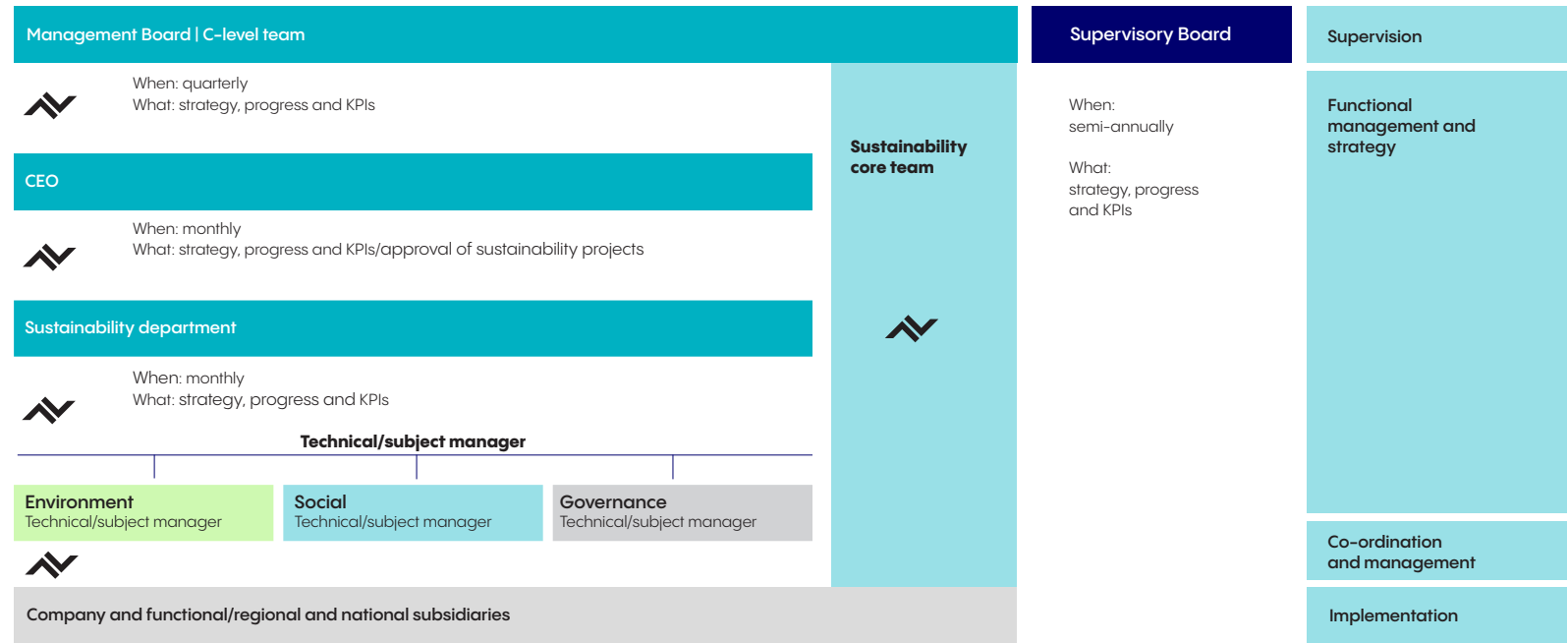
The overall co-ordination of Group-wide sustainability matters is the responsibility of the central sustainability organisational unit. The management of the sustainability unit is the highest position with responsibility for sustainability and climate-related issues below the Management Board/C-level team and reports directly to the CEO. Its specific tasks include preparing recommendations for action for the NFON Group and the business units. In addition, the unit is responsible for planning and monitoring the achievement of the relevant targets, for example in relation to our climate protection goals. The business units bear the responsibility for implementing the goals, strategies and measures. The sustainability unit designs the transformation of NFON at the level of sustainability and ensures it is implemented. It is responsible in particular for defining the integrated sustainability and decarbonisation strategy and the related Group-wide goals and key performance indicators as well as for planning, managing and implementing Group-wide transformation projects. The responsibility for the contents of subject-specific sustainability matters lies with the relevant departments.

The matters involving sustainability have top priority within the framework of the company's development. The Supervisory Board is informed of the status of the sustainability and climate protection issues every six months, the Management Board every three months. The CEO is informed about issues relating to the environment through regular briefings, scheduled monthly meetings with the VP Investor Relations & Sustainability and, when necessary, in-depth workshops on strategies and goals.

The design of the variable remuneration of Management Board members is geared towards sustainability targets. More information can be found in the "Remuneration report" section in the [annual report](#).

⁵ Element of our efforts to meet the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). Development is an integral part of the medium-term roadmap in the area of sustainability

Organisation and reporting structure in the area of sustainability



Supervision

Supervisory Board: Monitors how economic, environmental and social sustainability is taken into account in the strategic direction of the company and how it is implemented. It additionally monitors that the strategic and operating plans include financial and sustainability targets. It further reviews whether the internal control and risk management system is also geared towards sustainability concerns. The chair of the Audit Committee has particular expertise in sustainability reporting. The Management Board reports to the Supervisory Board every six months on the progress and results of the sustainability projects.

Management Board/C-level: Ensures that the economic, environmental and social impacts of the company's activities are systematically identified and assessed. It additionally supports the projects that are key for the sustainable transformation and encourages the workforce to act sustainably and to contribute ideas on how NFON can become even more sustainable. The Chief Sustainability Officer and the responsible executives report to the Management Board every quarter on the progress and results of the sustainability projects.

Functional management and strategy

Sustainability department: Key sustainability issues for NFON are coordinated by the Sustainability department, which reports directly to the CEO and acts as a company-wide interface for sustainability. As Chief Sustainability Officer, the CEO bears overall responsibility for the sustainability efforts. The department is headed by the VP Investor Relations & Sustainability. It is responsible for developing, improving and updating the purpose, the values, the guidelines and the goals of NFON in relation to all aspects of sustainability so that they are consistent with the company values and the legal framework. The Sustainability department additionally manages the central SharePoint, in which all key documents on sustainability issues are filed.

Co-ordination and management

Technical or subject managers: Take part in the process of developing, improving and updating NFON's sustainability efforts. They drive sustainability matters in their units on their own initiative and supply the topics and contents for the reporting.

Implementation

Business units: Responsible for the operational design of our sustainability strategy and for providing the resources necessary for this. In addition, the research and development departments work on key technologies and, through this work, create the foundation for the sustainable services and products of tomorrow.

Group functions: Support the implementation of our sustainability strategy in the relevant cross-cutting areas – for example in the development of instruments for the management of suppliers, in the measurement of greenhouse gas emissions or in the design of sustainable financing.

Regional and national companies (in development): The responsible managers of the regional and international subsidiaries ensure that the Group guidelines are implemented and the legal requirements are complied with in their respective regions. Supported by the Group functions and the operating business units, they develop and implement a strategy that is adapted to the locations and local conditions.

Sustainability strategy and goals

The spoken word creates closeness, expresses respect and speeds up the flow of information. Modern voice communications therefore play an important role in the long-term success of the company – and pave the way to sustainable action.

The sustainable WE

We take sustainability personally here. Which is why we speak of a sustainable “we”. Only together we will succeed in not only focusing on the interests and needs of the present generation, but also on the needs of future generations.

NFON will revise the Group strategy in 2024 and, in the process, anchor the topic of sustainability as a key component in the corporate strategy. To this end, we will fundamentally revise our sustainability strategy, governance and reporting in the coming months. We will thus subject all of NFON's sustainability goals specified in the report to a review.

⊕ Further information can be found at corporate.nfon.com/en/sustainability/esg

Our priorities in the area of sustainability in 2024



NFON SUSTAINABILITY STRATEGY

Development of a comprehensive sustainability strategy based on our material matters



NFON DECARBONISATION STRATEGY

Development of the decarbonisation strategy in accordance with the criteria of the Science Based Targets initiative



DEVELOPMENT OF DATA AND REPORTING

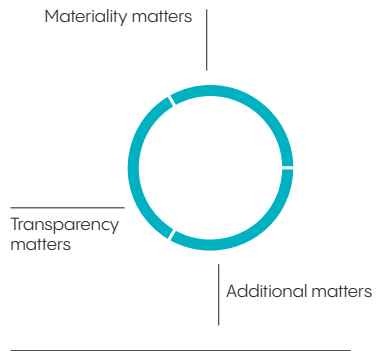
Constant enhancement of the data quality and preparation of the CSRD reporting



DEVELOPMENT OF GOVERNANCE

Integration of sustainability aspects in our corporate strategy and decisions

SUSTAINABILITY MATTERS



The key issues in our sustainability reporting

On our road to sustainable and profitable growth for the NFON Group, we also rely on the support and acceptance of our stakeholders. For this reason, we identified the sustainability matters that are key for NFON in the course of a materiality assessment in 2021 ([Annual and sustainability report 2021](#), page 13). The analysis is based on the process proposed by the Global Reporting Initiative (GRI). We initiated an update of our materiality assessment at the end of 2023. We are doing this in order to meet the requirements of the future national implementation of the Corporate Sustainability Reporting Directive (CSRD) and to identify and validate the key issues for the reporting and our strategic sustainability management. The results of the materiality assessment, which follows the principle of double materiality, are evaluated from a quantitative perspective. They are subsequently reviewed in qualitative terms in a workshop with experts from the core sustainability team. Finally, the set of key matters will be established. Our sustainability matters will in future comprise the results of the materiality assessment (material matters), our requirement for transparency in respect of our stakeholders (transparency matters) and topical additions based on an internal assessment of their importance (additional matters). The CEO is informed of the results.

NFON materiality matrix

Our materiality assessment, which follows the principle of double materiality, is mapped in the [Annual and sustainability report 2021](#), (page 12–13) and, like the mapping of the 17 Sustainable Development Goals (SDG) of the United Nations, is currently undergoing a revision. We will map the results in our 2024 sustainability report.

Stakeholder management

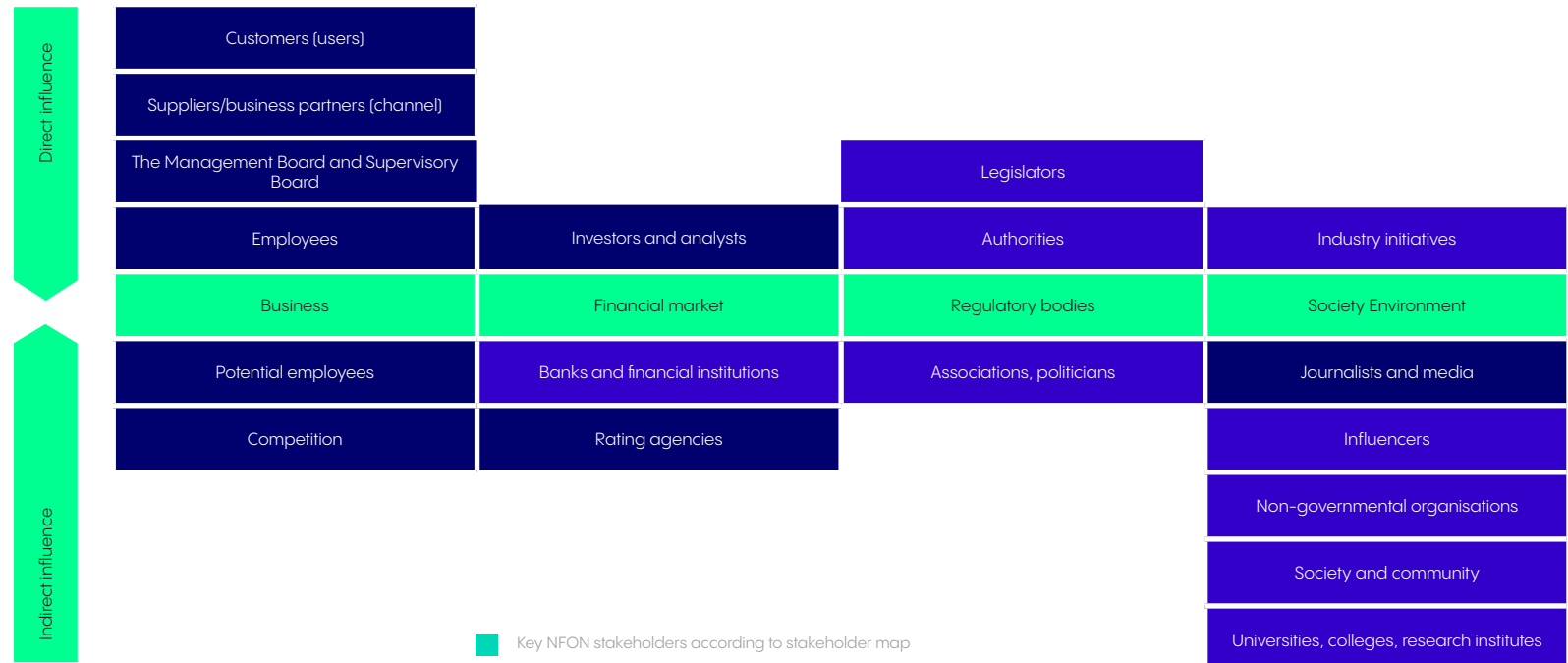
As the NFON Group, we maintain a large number of business relationships with companies, organisations, public bodies and individuals – what are referred to as our stakeholders. Stakeholders do not act independently of each other at any time. They are part of the system and shape it through their actions. Continual and systematic exchanges with our internal and external stakeholder groups are an important element in determining future areas on which our company activities and also our sustainability strategy will focus on. Business decisions can fundamentally affect individual stakeholder (groups), while, conversely, the actions of individual stakeholders can have material impacts on NFON's business activities. Dialogue based on the idea of partnership therefore represents a key success factor for us. Our stakeholders are engaged in the actions we take within the framework of open and transparent communication. Because it is only through our partnership-based relationships that we can identify new challenges and effectively prioritise and take successful advantage of opportunities. Acceptance and appreciation of all actors form an important basis for our engagement.

Our stakeholders

The relationship of our stakeholders with each other is determined by their proximity to NFON. This also determines the possibility of exerting a direct or indirect influence. Our internal groups include our employees, the Management Board and the Supervisory Board, which are able to exert a direct and indirect influence and impact. External groups, in contrast, include authorities, associations or universities, for example, which have an indirect ability to exert a direct and indirect influence and impact. Depending on the specific relationship in which the individual stakeholders meet each other, external stakeholders can

also have a direct influence on NFON, however. We produced a map of our stakeholders when we prepared our materiality assessment, in which we presented in detail the groups that are of crucial importance for our company. We determined the mapping using an online survey, which was conducted by an independent institution. The survey was preceded by a workshop. The participants and the persons surveyed comprised the Management Board, the C-level team and the management of the NFON Group. The results are presented in the stakeholder map.

NFON stakeholder map



For more information on the subject of stakeholders, please visit corporate.nfon.com.

Key NFON stakeholders according to stakeholder map

MEMBERSHIPS AND NETWORKS (EXTRACT)

Environment

Leaders for Climate Action



Industry

Verband der Anbieter von Telekommunikations- und Mehrwertdiensten e.V. (VATM – Association of telecommunications and value-added services providers)



Investors and analysts are crucial groups in the stakeholder dialogue, as they exert a key influence on the company's financial well-being. Their forecasts and assessments can have a direct impact on the share price and the ability to raise capital. An open and transparent dialogue with these groups is therefore important for building trust and ensuring investments.

Our **(potential) employees** are also of great importance and a key element in the company's success. They are the people who express the company's attitude at various levels. In the functions they perform, they are ambassadors of our [+ company values](#), they plan and co-ordinate our services and they are responsible for the ongoing dialogue with our stakeholders. Regular exchanges help the company understand their needs and concerns, enhance their motivation and encourage their loyalty. Satisfied employees make a key contribution to the company's productivity and innovative ability. A positive image as an employer and the clear communication of career opportunities can play a part in attracting talented skilled employees and retaining them over the long term. More information on our employees can be found in the chapter on [+ Employee matters](#).

Customers (users) are the main users of our products and services. Appreciating their feedback and understanding their needs is crucial for our ability to continually improve our offer and to build long-term customer relationships. An active dialogue with our customers helps us to increase their satisfaction and strengthen their loyalty.

The Management Board and the Supervisory Board bear the responsibility for the company's strategic direction and for adherence to compliance directives in the company. Regular dialogue with these boards allows their expectations to be understood, a transparent structure for decision-making processes to be created and the confidence in the company's management to be enhanced.

Rating agencies assess the financial standing, creditworthiness or sustainability efforts of a company. An open dialogue with these agencies is important for keeping them informed about the company's financial or sustainable performance, the corporate strategy and any risks the company faces. A positive rating can have a favourable impact on the company's financing options, business relationships and image.

The **competition** is an important stakeholder, as it exerts a direct influence on a company's market and market position. Continually monitoring competitors allows trends and developments on the market to be understood competitive advantages to be identified and strategic partnerships to be developed.

Suppliers and business partners (channel partners) are essential in a company's value chain. Close exchanges help to ensure smooth co-operation, prevent supply constraints and take advantage of shared potential for innovation.

Journalists and the media play an important role in a company's public image. Transparent dialogue with these groups allows information to be disseminated correctly and promptly, crises to be effectively managed and the company's image to be cultivated.

Stakeholder dialogue

We are in regular communication with our stakeholders. Contact is naturally closest with the internal stakeholders – the employees, the Management Board and the Supervisory Board (also see the [+ group corporate governance statement](#) for the dialogue between the Management Board and the Supervisory Board). The more distant the stakeholder group is from us as a company, the more the contact shifts to project-related, department-related (universities, trade associations) or care-specific (authorities) communication. By maintaining comprehensive exchanges, we cover a broad range of sociodemographic factors, such as background, gender, age and education level, through our stakeholder dialogue. In the following, we provide an overview of the issues and formats that were key in the period under review:

STAKEHOLDERS	ISSUES IN 2023	THE MOST IMPORTANT COMMUNICATION AND DIALOGUE FORMATS	
Banks and financial institutions	Management changes Competitive situation Sustainable and profitable growth M&A	Conferences Direct (virtual) contact	Investor Relations website
Authorities	Requests for information	SECS tool	Direct (virtual) contact (e-mail, fax)
Investors and analysts	Management changes Competitive situation Sustainable and profitable growth Ongoing business and strategy development M&A	Conferences (Virtual) one-on-ones Webcasts	Direct (virtual) contact Investor Relations website
Journalists and media	Channel campaigns, integration Management changes	Press releases Interviews	Press and background interviews
Customers (users)	Price changes Product launch Campaigns	Newsletter Social media	Push notifications
Suppliers	Co-operation based on trust NFON Code of Ethics	Direct (virtual) contact	Supplier survey
Business partners (channel)	Price changes Product launch Campaigns Management changes	Newsletter Webinar (Partner Box) Partner portal	Events (trade fairs, partner days) Social media Direct (virtual) contact
Employees	Strategy Management changes	E-mail Q&A sessions Management breakfast Pitch your ideas Intranet (NFON Inside)	NFON update Direct (virtual) contact OTRS ticket system for People@nfon enquiries Management meetings
NGOs	Support for projects Charitable donations	Direct (virtual) contact	Sustainability website
Potential new employees	Career opportunities	Personio (mailings) LinkedIn job ads Direct (virtual) contact Job interviews	Career page: Kununu, Glassdoor, Indeed, Stepstone, etc.
Rating agencies	Support for projects Charitable donations	Direct (virtual) contact	Participation in the scoring process
Universities, colleges, research institutes	Training subjects	Direct (virtual) contact	
The Management Board and Supervisory Board	Management changes Strategy Budget	Direct (virtual) contact Point-to-point dialogue	Management Board and Supervisory Board meetings
Competition	Market trends Market potential and challenges	Industry meetings	Events

RATINGS AND RANKINGS IN THE AREA OF ESG

MORNINGSTAR | SUSTAINALYTICS

EthiFinance Ratings

INTEGRITY NEXT

CDP
DISCLOSURE INSIGHT ACTION

ESG ratings and rankings

Independent assessments by ESG rating agencies constitute a key indicator for our action. We maintain a dialogue with agencies such as Sustainalytics, EthiFinance Ratings and IntegrityNext.

We received a participation review from CDP (previously Carbon Disclosure Project) for the first time in February 2024 and were awarded a score of D (disclosure). CDP is an internationally recognised non-profit organisation that supports companies and cities in measuring, managing and disclosing their environmental impacts. The D score assesses a company's environmental performance based on criteria such as carbon emissions, energy consumption and climate strategies. This assessment shows a positive development and reflects our commitment to environmentally aware action. It is only the starting point for us, however, and shows that we have set out on our journey. Through our participation and the related assessment by CDP, we want to underline our ongoing efforts in the areas of sustainability and climate protection.

Sustainable finance

At NFON, we see it as a priority for 2024 that we address the important subject of the EU Taxonomy and thus the promotion of environmentally sustainable investments. As part of the European Green Deal, the European Union has placed the topics of climate protection, the environment and sustainability at the heart of the political agenda. A key building block for this is the EU Taxonomy (Regulation (EU) 2020/852 and related delegated acts that have been adopted), which entered into force in the middle of 2020. The taxonomy is an instrument that supports investors, companies and project developers in the transition to low-carbon, resilient and resource-efficient economic activities.

EU Taxonomy

The EU Taxonomy is a system for classifying environmentally sustainable economic activities, where a distinction is drawn between taxonomy eligibility and taxonomy alignment. An economic activity is regarded as taxonomy-eligible if it can potentially make a substantial contribution to at least one of the following six environmental objectives:

- climate change mitigation
- climate change adaptation
- sustainable use and protection of water and marine resources
- transition to a circular economy
- pollution prevention and control
- protection and restoration of biodiversity and ecosystems.

The economic activity can be classed as economically sustainable, i.e. as taxonomy-aligned, only if all of the following conditions are met:

- It makes a substantial contribution to one of the environmental objectives;
- It complies with the do no significant (DNSH) criteria, what are designed to prevent one or more of the other environmental objectives from suffering a significant adverse impact;
- It complies with frameworks for minimum protection in terms of occupational health and human rights (minimum safeguards).

At the time of this report, NFON is not covered by the reporting duties under the EU Taxonomy for non-financial reporting pursuant to Article 19a and Article 29a of Directive 2013/34/EU. We are at this time preparing the audit of the taxonomy-eligible and taxonomy-aligned shares of the revenue, capital expenditure (CapEx) and operational expenditure (OpEx) in accordance with the six environmental objectives so that we can report voluntarily on the EU taxonomy for the first time in financial year 2024. We are convinced that the integration of these standards in our corporate practice will play a part not only in achieving our sustainability goals, but also in strengthening the confidence of our investors and stakeholders.

⊕ More information can be found in the "Opportunities and risks" section in the [annual report](#)

Risk management


Like many other companies, the NFON Group operates in a diverse environment. In addition to economic factors, there are a large number of non-financial aspects that affect NFON or that NFON affects and that can, directly or indirectly, influence NFON's financial result. Examples include energy consumption and its associated costs and the shortage of skilled labour. The [⊕ key issues](#) at the NFON Group represent challenges that may develop into a business risk if they are not handled or poorly prepared. As things stand, we do not believe that any of the material sustainability matters pose an acute business risk. More information can be found in the "Opportunities and risks" section in the [⊕ annual report](#).

Compliance risks

We identify the risk of compliance violations, including corruption risks, using a systematic risk assessment involving the company's business areas and regions and countries. The planned compliance audits are another source of information for identifying systematic risks. Risks are documented in the risk and/or audit report. This also applies to specific risk mitigation measures and the time frame for implementing these.

05 Environment

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Environment



Our mission

We want NFON to have a positive impact on the planet every day.

NET ZERO VS CLIMATE NEUTRALITY

NFON's understanding of net zero or carbon neutrality is based on the definition of net zero used by the SBTi and thus on an established standard. NFON uses the terms "climate neutrality" and "climate-neutral" in its sustainability reporting only in relation to climate policy frameworks.

Climate policy framework

The Paris Agreement comprises the global plan of action to limit the increase in man-made greenhouse gas effects and resulting global warming to well below 2°C and preferably to under 1.5°C above pre-industrial levels. The European Union (EU) consequently set itself the target with the Green Deal to reduce emissions of greenhouse gases in the EU by 2030 by at least 55% compared with emissions in 1990. Europe thus intends to become climate-neutral by 2050. To achieve this, it is necessary to drastically reduce energy use, use low-carbon energy sources and to remove carbon dioxide from the air and store it permanently on a large scale. The "Fit for 55" agreement is here regarded as trailblazing for the European property sector. As a leading European provider of integrated cloud business communications, we are actively assuming responsibility for the protection of the climate and the environment.

Operational environmental protection

We pay attention to environmental protection in the course of our (office) activities. NFON has its own companies in Germany, Austria, the United Kingdom, Spain, Italy, France, Poland and Portugal with a total of 13 office locations as well as data centres in Frankfurt am Main, Munich and Nuremberg. Energy, water and paper are consumed at these offices, where the consumption of energy and materials is partly determined by the individual behaviour of the employees. The operational environmental protection is largely organised on a local basis at the locations in question. Two factors are particularly relevant for us in reducing energy and emissions at our locations: the purchase of electricity from renewable sources and the mobility of the employees.



Our goal Emissions

We want to reduce greenhouse gas emissions and achieve net zero by 2025.

Emissions

Relevance

Climate change will be the strongest driver of all social, political and economic developments in the decades to come.

Ways of life and models of prosperity are currently undergoing fundamental changes around the world.

NFON does not operate in a sector with high levels of emissions and the production of our products/provision of our services is relatively low-emission compared to other industries. NFON's communication solutions play a major role in cutting greenhouse gases by reducing the distance travelled for business meetings or even on the commute to work.

Measures

Climate footprint

In the 2023 reporting year, we surveyed our corporate carbon footprint (CCF) for financial year 2022, and this provides for the first time a comprehensive picture of all of the company's emissions along the entire value chain. Financial year 2022 was selected for the calculation for reasons of data availability. The results for 2023 will be published in the following year. In comparison with the preceding carbon footprints in previous years, the quality of the data was improved, gaps in the data were closed and all relevant sources of emissions (Scope 3 in accordance with the Greenhouse Gas Protocol) were included in the calculation. The quality of the data will also be enhanced and complemented in the future.

In 2023, NFON's focus was on preparing the first carbon footprint in the form of a CCF. It provides information on all the greenhouse gas emissions (GHG emissions), expressed in CO₂ equivalents (CO₂e), for which a company is responsible along its value chain. It enables the footprint of GHG emissions for the 2022 footprint year to be comprehensively mapped, potential improvements to be identified and the progress being made in savings to be measured. The CCF thus forms the basis of our mission to produce fewer emissions within our business processes.

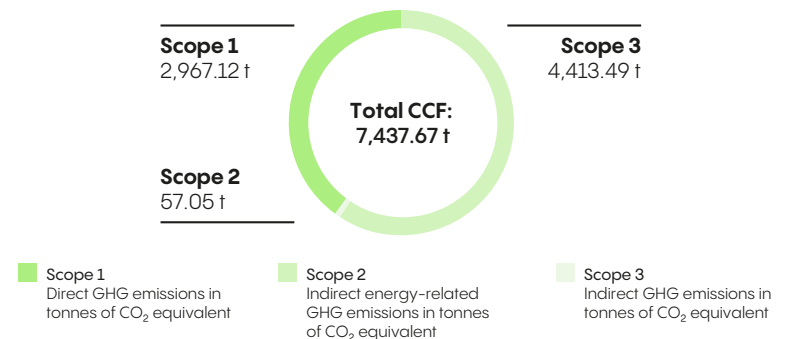
CO₂ EQUIVALENTS (CO₂E)

Carbon dioxide (CO₂) is the most well-known greenhouse gas. Other greenhouse gases are also emitted in companies' value chains, however. Ultimately, it is always the companies themselves that emit the scope 1 greenhouse gases, such as methane (CH₄) or nitrous oxide (N₂O).

Some of these greenhouse gases have a significantly higher potential to increase global warming than CO₂. To make it easier to compare them, greenhouse gases other than CO₂ are frequently indicated based on their warming potential as CO₂ equivalents. These are also taken into account accordingly in NFON's CCF calculation.

Against this background, a well-founded, scientific methodology based on recognised standards is of major importance. The internationally recognised Greenhouse Gas (GHG) Protocol was used to provide a systematic basis here. The presentation of the results follows the specifications of the GHG Protocol Corporate Standard, including the Corporate Value Chain (Scope 3) Standard.

Corporate carbon footprint 2022



Methodology

Scope 1 and 2: The calculations of the Scope 1 and 2 emissions are based on the consumption data of all NFON offices in 2022 that is available to us. If no data was available, we made assumptions on the basis of the best possible approximation (energy certificate of the building, average heat consumption of office buildings, etc.). No data on cooling agents is available to us at the moment. Both the location-based method and the market-based method were used to calculate the Scope 2 emissions (electricity and district heating). The market-based method was used to calculate the overall CCF.

- Scope 2 emissions **location based:** 94.27 tCO₂e
- Scope 2 emissions **market based:** 41.58 tCO₂e

Scope 3: In order to obtain NFON's emissions along the entire value chain, we considered the scope 3 categories relevant for us – there are 15 categories in total – and included the data available for these.⁶

Management

NFON has not implemented an internal carbon pricing system for assessing or internalising CO₂e emissions at the moment. Our sustainability strategy, which is currently being revised, concentrates on other instruments for reducing CO₂ equivalents.

Car policy⁷

In line with our environmental responsibility, we have specified the use of fuel-efficient vehicle and engine types and also envisaged the use of battery-electric vehicles (BEV) or plug-in hybrid vehicles (PHEV) where this makes economic, environmental and logistical sense. CO₂ emissions per kilometre now also come into play for determining the company vehicle category. In this context,

we have introduced a bonus scheme that favours the choice of a BEV or PHEV.

Job Bike, BahnCard and job tickets

We launched the "Job Bike" initiative in 2022. We offer our employees in Germany the opportunity to lease a company bicycle. The Job Bike scheme turns bicycles and e-bikes into company bikes. The bike can be used for travelling to work, for everyday journeys, on holiday or for sports. As part of the Hybrid Working @ NFON project launched in 2021, we also offer a job ticket for employees who work in the office at least three days a week to use on public transport. In addition, employees who take a lot of business trips can receive a BahnCard (rail card). The number of employees taking up these options has risen considerably since 2022.

Mobility offers

	2023		2022		2021	
	absolute	in %	absolute	in %	absolute	in %
Total	137	100	126	100	62	100
Of which job tickets	42	31	45	36	0	0
Of which railcards	28	20	18	14	6	10
Of which job bikes	35	26	33	26	32	52
Of which company car	32	23	30	24	24	39

Company car fleet by drive type

	2023		2022*		2021	
	absolute	in %	absolute	in %	absolute	in %
Total	32	100	30	100	24	100
thereof Diesel	24	75	27	90	22	92
thereof E-cars/hybrid	8	25	3	10	2	8

* The available figures have been adjusted.

⁶ Recorded: leased assets. Partly recorded: purchased goods and services, capital goods, upstream transport and distribution, business travel. On the basis of a survey: commuting. No data currently included as yet: waste, use of sold products, upstream transport and distribution, processing of sold products, end-of-life treatment of sold products. Not relevant: franchises, investments.

⁷ Car policy refers to all branches in Germany.

CLIMATE FOOTPRINT

The CCF calculations have been carried out in accordance with the specifications of the Greenhouse Gas Protocol (GHG).

The calculation of the climate footprint differs significantly from the GHG emissions in past reporting years. A direct comparison of the reported data for 2022 is therefore not possible.

Next steps

Our products and services mean that we are not major CO₂e polluters. Nevertheless, we can and want to do more to reduce emissions. One key factor in achieving a positive carbon footprint is preventing, reducing and offsetting greenhouse gas emissions. We will set a crucial milestone in 2024: the development of a comprehensive decarbonisation strategy. Working in close co-operation with external experts, we are aiming to define a path that will set our company on a sustainable course in terms of emissions and climate change. This strategy will then be approved by the Management Board. The next step will involve examining the possibility of submitting our climate goals to renowned institutions such as the SBTi. In terms of the CO₂e impacts of our products, we are endeavouring, where possible, to quantify the positive effects and making them transparent.

But even today, we can make a bigger contribution in our day-to-day work. The introduction of a tool for our digital business travel management means we can not only reduce costs and optimise processes, but also guarantee greater transparency and compliance in our travel management. We will also use the tool to initiate our travel policies. The system additionally offers us the possibility of preparing a CO₂e emissions report. The travel management tool will initially be introduced for our German companies. Always keeping our goals in mind, we will also review and revise our car policy in 2024 as well as the regulations on electricity usage in our own offices and mobility policies for our employees. With this clear focus on decarbonisation and a stringent review of the progress we are making, we are committed to pursuing a sustainable path into a low CO₂e future.



Our goal Energy

The German government has decided to increase the share of electricity from renewable energy sources in gross electricity consumption to at least 80% by 2050. We are committed to this goal and want to meet it at NFON by 2025.

Energy

Relevance

Because we are not a manufacturing company, our biggest lever in operational environmental and climate protection is our own energy consumption. A crucial factor here is the purchase of the energy itself and, where possible, the accompanying switch to electricity from renewable sources. We consume significant amounts of electricity in our data centres.

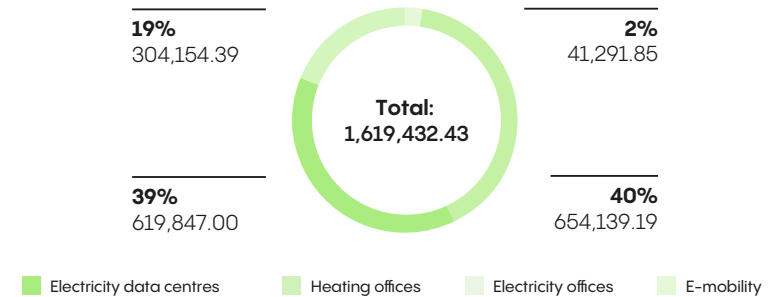
Measures

Green electricity at NFON data centres

As a telecommunications service provider, we consume significant amounts of electricity in our data centres. In line with the Green Deal⁸ adopted by the EU in the summer of 2021 and the 2030 Agenda⁹ adopted by the United Nations, the German government has decided to increase the share of electricity from renewable energy sources in gross electricity consumption to at least 80% by 2050.¹⁰ We are committed to this goal and purchase only electricity from renewable energy sources for our data centres in Munich, Nuremberg and Frankfurt.

Performance indicators to measure the effectiveness of the measures introduced

Energy consumption (kWh)



⁸ https://ec.europa.eu/commission/presscorner/detail/de/IP_21_3541

⁹ https://www.nachhaltigkeitsrat.de/wp-content/uploads/2022/01/20220120_RNE_Stellungnahme_Our-Common-Agenda-Guterres-UN-Reformoptionen.pdf

¹⁰ <https://www.bundesregierung.de/breg-de/themen/nachhaltigkeitspolitik/bezahlbare-und-saubere-energie-1581908>

Use of renewable energies and reduction of energy consumption

Our locations in Berlin, Mainz, Lisbon and St. Pölten have largely been supplied with electricity from renewable sources since 2022. We are also constantly examining the possibility of using electricity from renewable energy sources in the other offices we rent (throughout Europe). As part of this, we will also examine the possibility of introducing energy reduction measures at all locations. As part of our continual evaluation, we are constantly optimising our offices to prevent them from standing empty and to reduce energy consumption. Our headquarters in Munich moved into a new office building at the end of 2023 in order to best meet the changing requirements.

Audits and certificates

Our Italian subsidiary has already been awarded ISO 14001 certification. The process to perform the energy audit in accordance with DIN EN 16247-1 was initiated at NFON in 2022. It was not possible to continue this in 2023 because of the transformation measures and personnel changes in the relevant areas of responsibility. We are now aiming to start on the implementation of ISO 50001 certification in 2024. More information on audits and certificates can be found on the [Compliance](#) website.

More information on audits and certificates at corporate.nfon.com

Next steps

We are constantly examining whether switching the offices we rent (throughout Europe) to electricity from renewable energy sources can be implemented. In addition, we are planning measures to raise awareness of energy saving actions among our colleagues. These include turning off monitors and computers in the evening. We are also continually evaluating our office premises and capacity at our locations to prevent them from standing empty.

We will start the process to implement ISO 50001 in 2024. This internationally recognised certificate is aimed at supporting companies as they introduce and maintain an efficient energy management system. By systematically identifying potential savings, implementing energy efficiency measures and continually monitoring and measuring energy consumption, we can not only reduce energy costs, but also improve our environmental footprint. By regularly revising and updating our energy management system in accordance with the specifications in the standard, we can ensure that we always comply with the current legal requirements while improving our energy efficiency at the same time. ISO 50001 can be seamlessly integrated in existing management systems such as ISO 9001 (Quality management). This means that not only is the efficient of the management systems improved overall, but synergy effects are also created when fulfilling requirements and using resources.



Our goal Waste

We want to help ensure that companies require fewer devices and servers for their communication by making increased use of cloud-based services. At NFON, we avoid generating polluting waste as far as possible.

Waste

Relevance

Our products mean that our customers no longer require their own telephones or entire telephone systems. By continuing and expanding our business model and generating further operating success as part of the sustainable and profitable growth we are pursuing, we are playing a key role in reducing electrical waste in the form of old telephone devices/systems.

Waste is of minor importance in our own business activities. As a software company that provides mostly digital products and services, NFON generates only very little waste as a result of developing, producing and providing these products and services. They involve non-hazardous waste, the majority of which is generated from regular urban waste in the course of day-to-day (office) work. The building management teams or owners and operators of the office buildings/premises we rent are responsible for compliance with the legal regulations governing waste management.

Measures

The more successful we are at marketing our products in Europe, the fewer on-site telephone systems our customers will need. Public authorities and companies will continue to use larger telephone systems. They tend to require large quantities of hardware made from valuable materials. The hardware generally has a very long service life. If it has to be replaced at the end of its useful life, however, it is beneficial from an environmental perspective to replace them with a cloud telephony system. Many countries still use desk phones or DECT 5. Here, too, we can ensure that all hardware we sell and that all employees have the possibility of selling is produced on the basis of sustainable principles. Examples of this include [Yealink](#), [Snom](#) and [Panasonic](#). Our hardware distribution is organised through distributors. Our major suppliers comply with their own codes of conduct. However, our telephone system can be used entirely without telephones and only with a PC or laptop, where necessary in combination with a headset. Our solutions offer considerable potential here to significantly reduce the use of hardware. For us, waste management is not just a question of large volumes.

We undertook a significant step towards sustainability at the end of 2023 when we launched the sale of a specific stock of older, used laptops to our employees. This measure aims to maximise the useful life of our IT hardware while reducing electronic waste at the same time. Our internal guideline stipulates that IT hardware that can no longer be used or that is defective is wiped clean in compliance with data protection regulations, collected and then either recycled or returned for appropriate recovery. Where defects arise in the data centres, our data centre operator carries out the disposal. Data storage media must be disposed of professionally, and this must be certified and documented.

At NFON, all employees have the opportunity to make their contribution to a sustainable corporate culture. Responsibly dealing with waste is a key aspect of our sustainability manifesto: we are careful at all offices to ensure that waste is separated, we give preference to sustainable products when making purchases and we minimise our use of paper.

Next steps

As a next step, we will offer older, used laptops for sale to our employees for the first time in 2024. Further steps are not currently planned, as this topic is of minor importance. However, we will review our waste management again in the course of revising the sustainability strategy.

06 Social

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Social

NFON company values



In accordance with our fundamental attitude as a company, we accept our social responsibility and demonstrate our approach by dedicating ourselves to our employees, customers, business partners and society. At NFON, people are at the heart of our corporate culture. Our common goal is to make communication easier and fit for the future. Diversity is not just a buzzword to us, but a firmly embedded value that characterises NFON. We are united by common values that form the foundation of our actions. These values are binding for everyone who works at or with NFON and guide us in our day-to-day work together.

Employee matters

Employment

Relevance

NFON is a growing company. The situation for companies that focus on software developers and accordingly on skilled workers in specific sectors barely changed in 2023 and continues to pose a challenge. As a technology company, we seek highly qualified skilled employees at home and abroad and look to gain their long-term commitment to us by offering a sustainable work

environment and opportunities to develop. This is why we set ourselves goals in terms of employee satisfaction, family friendliness and the remuneration policy as well as diversity, equal opportunities and non-discrimination.

Measures

Recent years have seen hybrid work develop from a theoretical possibility into practical reality for many companies. This development raises numerous questions, many of which have still not been answered because we lack experience in this area. In search of some answers, we launched the one-year “Hybrid Working @ NFON” pilot project at the end of 2021. Various working groups looked into management in hybrid working, work organisation and organisational development. We view hybrid working as an opportunity. Those who have the choice between offices in different locations and working from home can better coordinate their life needs and thus use their energies in a more targeted way. Family and work can be balanced more easily.

In 2023, we encouraged our employees to spend around 40% of their time in the office in order to strengthen the team dynamics. The last three days of each month were also defined as days for working in the office. All employees can work from home three days a week, where their role allows. Employees who work in the office at least three days a week receive a job ticket. In addition, employees who live a long distance away from the NFON branches can work entirely from home.



Our mission

We build and cultivate a place where we all enjoy being and where we can grow. We transfer this to all communities that work with us.



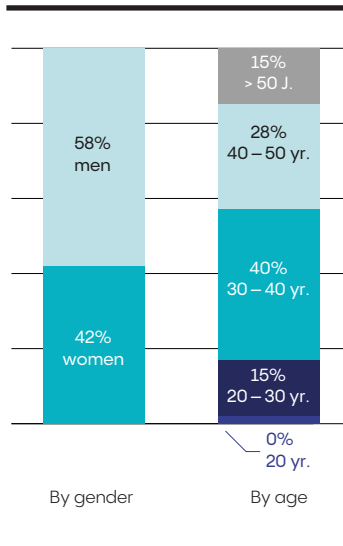
Our goal Employment

We want to achieve an employee satisfaction rate of 80% by 2025.

Hybrid working (remote work employment contracts) (as at 31.12) / NP

	2023		2022		2021	
	absolute	in %	absolute	in %	absolute	in %
Total	108	100	96	100	46	100
By gender						
Of which women	31	29	21	22	4	9
Of which men	77	71	75	78	42	91
By age						
< 20 years	0	0	0	0	0	0
20 to 30 years	9	8	8	8	5	11
30 to 40 years	38	35	30	31	16	35
40 to 50 years	42	39	41	43	18	39
> 50 years	19	18	17	18	7	15

WORKATION
as at 31.12.2023



- **Workation:** The aim of this benefit is to allow employees who have been with the company for more than a year to choose their work location for 20 working days a year with a degree of flexibility. Workation means that they have the opportunity to work somewhere other than their usual remote workplace or NFON office. This improves their work-life balance. The costs of a workation are covered by the employee.
- **Sabbatical:** The aim of this benefit is to give employees the opportunity to take a break from the workplace for personal reasons for up to three months within a 36-month period. Employees at every level are entitled to this.
- **Co-working:** The aim of this benefit is to give employees greater flexibility in organising their workplace and to enable them to work from each NFON location for up to 180 days a year. NFON does not cover any of the costs of co-working from other locations.

A total of six employees have used the opportunities to take a sabbatical or to engage in co-working.

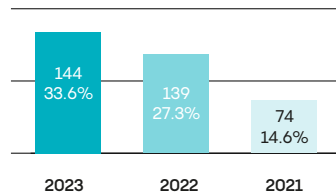
NFON is rated on Kununu and Glassdoor by employees and former employees, which enables potential applicants to gain insights into the work environment and the corporate culture at the company. Aspects such as working conditions, remuneration, management style, development opportunities and working atmosphere are rated on both platforms. The ratings can vary dramatically and reflect each individual's experience of the company. On [Kununu](#) at the end of March 2024, we had a score of 3.7 and a recommendation rate of 57%. On [Glassdoor](#), we had a score of 3.5 and a recommendation rate of 69%.

We direct ongoing efforts at keeping the turnover rate as low as possible. This goal underlines our commitment to our employees and our organisation as a whole. A low turnover rate not only promotes the stability and continuity of our team, but also increased productivity and reduces the expenses for recruitment and onboarding. We are therefore actively committed to creating a positive work environment, supporting development opportunities and responding to the needs of our employees. NFON nevertheless recorded a higher turnover

rate of 33.6% in 2023, which can very largely be attributed to the consequences of the reduction in the workforce in 2022 as well as the start of the transformation that we initiated in the middle of 2023. This time of change and restructuring has led to an increase in the turnover rate at the company.

FLUCTUATION

as at 31.12 / NP



Joiners and leavers (as at 31.12) / NP

	2023		2022		2021	
	absolute	in %	absolute	in %	absolute	in %
Employee additions in total	40	100	79	100	62	100
By gender						
Of which women	21	53	25	32	25	40
Of which men	19	48	54	68	37	60
By region						
Of which Germany	34	85	49	62	36	58
Of which Austria and CEE	1	3	7	9	5	8
Of which United Kingdom	2	5	5	6	7	11
Of which Portugal	3	8	7	9	6	10
Of which Italy, Spain, France, Poland	0	0	11	14	8	13
By age						
< 20 years	0	0	0	0	0	0
20 to 30 years	10	25	13	16	13	21
30 to 40 years	18	45	28	35	20	32
40 to 50 years	8	20	28	35	19	31
> 50 years	4	10	10	13	10	16

	2023		2022		2021	
	absolute	in %	absolute	in %	absolute	in %
Employee departures in total	116	100	139	100	69	100
By gender						
Of which women	48	41	50	36	34	49
Of which men	68	59	89	64	35	51
By region						
Of which Germany	98	84	93	67	51	74
Of which Austria and CEE	5	4	3	2	6	9
Of which United Kingdom	7	6	11	8	7	10
Of which Portugal	2	2	10	7	0	0
Of which Italy, Spain, France, Poland	4	3	2	1	5	7
By age						
< 20 years	0	0	0	0	0	0
20 to 30 years	21	18	19	14	12	17
30 to 40 years	43	37	75	54	9	13
40 to 50 years	31	27	21	15	14	20
> 50 years	21	18	24	17	14	20

Next steps

The measures implemented represent another key step towards improving employee satisfaction. The task now is to review the measures put in place and ensure that they are effective. To this end, we conduct interviews on feedback, performance and targets twice a year.

Staff appraisals are crucial instruments for the development and growth of employees in organisations. They offer the opportunity to assess performance,

set targets and exchange feedback. With this in mind, the introduction of a comprehensive feedback process for NFON in 2024 will represent an important milestone. The step highlights the efforts NFON is making to continually optimise the employees' performance and to support their development. This strategic approach underlines our commitment to excellence and ensures that the organisation continues on a path to growth and success.



Our goal

Family friendliness

We want to foster a family-friendly working environment for our employees where they can enjoy a good family/work life balance. No one should have to accept limitations on their family life as a result of working for NFON.

Family friendliness

Measures

Even hybrid working makes it easier to have a better family/work life balance. Nevertheless, we understand that it must be possible for employees to look after their children regardless of whether they are working in the office or from home. One way of ensuring this is by taking a flexible approach to working hours. As an employer, we can also take other measures to actively support our employees. On top of statutory parental leave, we thus also give our employees with children a nursery allowance and additional leave for when their children are ill. Upon request, we pay a nursery allowance of EUR 100 a month

for each child. If their child falls ill, our employees can take up to 10 days off on full pay.

Next steps

A crucial element for us as a family-friendly employer is authenticity in our commitment to the family-work life balance. This also includes communicating the family-friendly nature of the company to the employees and embodying it at all levels of the management. We will review our measures relating to the family-friendly aspect in 2024. And we will adjust existing measures or introduce new ones where necessary.

Key indicators of family friendliness¹¹ (as at 31.12) / NP

	2023		2022		2021	
	absolute	in %	absolute	in %	absolute	in %
Employees who have taken parental leave in total	25	100	25	100	24	100
Of which women	12	48	11	44	14	58
Of which men	13	52	14	56	10	42
Employees who have returned from parental leave in total	23	100				
Of which women	10	43	n/a	n/a	n/a	n/a
Of which still employed after 12 months	10	43	n/a	n/a	n/a	n/a
Of which men	13	57	n/a	n/a	n/a	n/a
Of which still employed after 12 months	13	57	n/a	n/a	n/a	n/a
Total number of taken Children's sick Days	80	100	193	100	83	100
Of which women	39,5	49	69	36	43	52
Of which men	40,5	51	123,5	64	40	48
Total number of taken Kindergarten subsidies	27	100	n/a	n/a	n/a	n/a
Of which women	14	52	n/a	n/a	n/a	n/a
Of which men	13	48	n/a	n/a	n/a	n/a

¹¹ Presentation not possible on data protection grounds: return to work rate and retention rate of employees who took parental leave



Our goal

Remuneration policy

Our employees receive the same salary for the same work. We pay fair and competitive salaries. We ensure that there are no structural remuneration differences between men and women or because of an employee's nationality or migrant background or because they belong to a minority group.

Remuneration policy

Measures

The basis for compliance with our remuneration policy is established in the budget process. Here, salaries are determined for each position and in accordance with the required skills and professional experience. All subsequent salary negotiations are conducted in a clearly defined process. To ensure the required objectivity and, in turn, equal treatment, any pay rise must always be approved based on the same criteria or measurement categories, such as the employee's development, development opportunity and mindset. The Kienbaum Compensation Portal provides us with a framework for assessing salary ranges.

Next steps

A transparent remuneration policy is a key criterion for good, trustworthy collaboration. We intend to publish our own guideline for our remuneration policy in 2024.



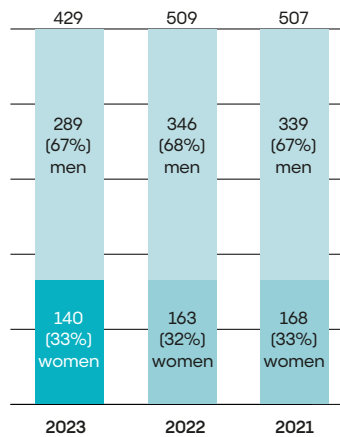
Our goal

Diversity, equal opportunities, non-discrimination

We pursue the goal of filling every position with the best possible expertise while also supporting our employees as best we can.

NFON EMPLOYEES

as at 31.12 / NP



Diversity, equal opportunities, non-discrimination

Measures

Diversity here means the diversity at the workplace, which is characterised by various features such as gender, ethnicity, nationality, religion, sexual orientation and much more. Last year, our workforce was made up of people from over 45 different nations (previous year: 48), which reflects an impressive cultural diversity within our teams. This is why English is the main business language at our company. All important documents are published in English and German. In view of the difficult labour market situation, we have not set a target for the filling of vacancies by women below the first management level after the Management Board. We pursue the goal of filling every position with the best possible employees. We also believe it is our duty to support and develop our employees. More information can be found in the "Corporate governance report – corporate governance declaration" section in the [annual report](#).

Equal opportunities represent another important aspect of our corporate culture. We endeavour to ensure that all our employees have the same opportunities to realise their full potential and to progress in their careers. Our commitment to diversity and equal opportunities remains a key component of our company values and we constantly engage in efforts to create an integrative and fair work environment.

Non-discrimination for us means that all employees enjoy the same rights and opportunities irrespective of their personal attributes. We do not tolerate discrimination when working with colleagues or business partners on the basis of age, disability, background, skin colour, gender, sexual orientation, religion, ideology or other personal attributes. If employees feel that they have been discriminated against or unfairly treated, they can use the new confidential mailboxes, the whistleblowing system or the advisory service of the compliance officer. We had one incident last year that we were able to resolve internally and that is no longer the subject of further measures or complaints. There were no reported cases of unequal treatment, discrimination or sexual assault in 2023. This is the result of our constant efforts to promote a culture of inclusion, respect and equality in which all employees feel safe and respected.

NFON employees by age group, gender and region (as at 31.12) / NP

	2023		2022		2021	
	absolute	in %	absolute	in %	absolute	in %
Employees < 20 years in total	0	-	0	-	0	-
Employees aged 20 to 30 years in total	44	100	54	100	44	100
By gender						
Of which women	18	41	22	41	22	50
Of which men	26	59	32	59	22	50
By region						
Of which Germany	26	59	34	63	30	68
Of which Austria and CEE	4	9	4	7	3	7
Of which United Kingdom	7	16	7	13	3	7
Of which Portugal	5	11	3	6	3	7
Of which Italy, Spain, France, Poland	2	5	6	11	5	11
Employees aged 30 to 40 years in total	137	100	165	100	189	100
By gender						
Of which women	54	39	64	39	71	38
Of which men	83	61	101	61	118	62
By region						
Of which Germany	100	73	127	77	139	74
Of which Austria and CEE	13	9	14	8	13	7
Of which United Kingdom	10	7	11	7	16	8
Of which Portugal	7	5	6	4	9	5
Of which Italy, Spain, France, Poland	7	5	7	4	13	7

	2023		2022		2021	
	absolute	in %	absolute	in %	absolute	in %
Employees aged 40 to 50 years in total	146	100	167	100	145	100
By gender						
Of which women	50	34	54	32	47	32
Of which men	96	66	113	68	98	68
By region						
Of which Germany	102	70	119	71	101	70
Of which Austria and CEE	12	8	13	8	12	8
Of which United Kingdom	11	8	12	7	13	9
Of which Portugal	6	4	7	4	4	3
Of which Italy, Spain, France, Poland	15	10	16	10	15	10
Employees > 50 years in total	102	100	123	100	128	100
By gender						
Of which women	18	18	23	19	27	21
Of which men	84	82	100	81	101	79
By region						
Of which Germany	67	66	78	63	86	67
Of which Austria and CEE	12	12	14	11	13	10
Of which United Kingdom	12	12	16	13	14	11
Of which Portugal	1	1	1	1	2	2
Of which Italy, Spain, France, Poland	10	10	14	11	13	10

The commitment to supporting women in management positions is an outstanding feature of our corporate culture. Through targeted programmes, mentoring and the creation of an inclusive work environment, NFON enhances the potential of women to be successful in executive positions. This initiative

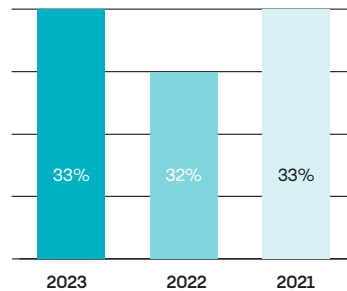
not only contributes to diversity and equal opportunities, but also enriches the decision-making process and promotes a dynamic corporate culture.

Diversity within the various employee categories (as at 31.12) / NP

	2023		2022		2021	
	absolute	in %	absolute	in %	absolute	in %
Salaried employees	346	100	429	100	433	100
By gender						
Of which women	117	34	144	34	155	36
Of which men	229	66	285	66	278	64
By region						
Of which Germany	234	68	303	71	303	70
Of which Austria and CEE	33	10	36	8	34	8
Of which United Kingdom	34	10	39	9	39	9
Of which Portugal	17	5	16	4	17	4
Of which Italy, Spain, France, Poland	28	8	35	8	40	9
Managers	82	100	78	100	73	100
By gender						
Of which women	23	28	19	24	13	18
Of which men	59	72	59	76	60	82
By region						
Of which Germany	60	73	53	68	52	71
Of which Austria and CEE	8	10	9	12	7	10
Of which United Kingdom	6	7	7	9	7	10
Of which Portugal	2	2	1	1	1	1
Of which Italy, Spain, France, Poland	6	7	8	10	6	8

RATIO OF WOMEN

as at 31.12



	2023		2022		2021	
	absolute	in %	absolute	in %	absolute	in %
Members of the Management Board	1	100	2	100	1	100
By gender						
Of which women	0	0	0	0	0	0
Of which men	1	100	2	100	1	100
By region						
Of which Germany	1	100	2	100	1	100

NFON employee by type of contract (as at 31.12) / NP

	2023		2022		2021	
	absolute	in %	absolute	in %	absolute	in %
Permanent salaried employees in total*	429	100	429	100	433	100
By gender						
Of which women	140	33	144	34	155	36
Of which men	289	67	285	66	278	64
By region						
Of which Germany	295	69	303	71	303	70
Of which Austria and CEE	41	10	36	8	34	8
Of which United Kingdom	40	9	39	9	39	9
Of which Portugal	19	4	16	4	17	4
Of which Italy, Spain, France, Poland	34	8	35	8	40	9

* Presentation not possible for data protection reasons: temporary employees

Next steps

Diversity has deep roots and is of central importance in our corporate culture. Using inclusive recruitment practices, training programmes and targeted measures to promote diversity and equal opportunities, NFON looks to make an active contribution to creating an integrative work environment in which all employees can develop their full potential. This commitment to diversity is not only reflected in the company's values, but is also a key and integral part of

NFON's corporate strategy, innovation and long-term success. Encouraging women in their careers, supporting families and introducing job sharing are important steps in creating a more inclusive and more balanced work environment. Measures like these can play a role in promoting diversity and well-being in the workplace.

Occupational health and safety

Relevance

Our employees are not exposed to any dangerous work processes. The safety of our employees matters to NFON and it must never be adversely impacted by efforts to improve efficiency. All employees have the right to work in a safe and healthy environment and have a duty to contribute to this by acting responsibly.

Measures

We regularly offer vaccinations and medical checks as preventive measures within the framework of our workplace health promotion. This certification programme for health and safety in the workplace sets out to provide the employees¹² with guidance on how to stay safe on the way to work, in the office and in emergency situations. This certification is part of the mandatory training for all NFON employees. As at the reporting date of 15 March 2024, 86%¹³ of our employees who were scheduled to take part in a training course on health and safety at the workplace had completed this. This corresponds to around 67% of the total number of employees as at 31 December 2023.

All workstations are ergonomically designed to protect employees' mental and physical health. Every employee can take a first aid training course at NFON's expense. All employees also receive discounted gym memberships. Employees can also make use of a "Job Bike" as part of the efforts to promote mobility. Colleagues in HR are available to answer any questions employees may have during open office hours.

Compared with the previous year, the absentee rate improved slightly at NFON in the past financial year. As in previous years, NFON did not record any fatalities as a result of work-related injuries in financial year 2023. There were no cases of serious work-related injuries (excluding fatalities) in 2023 (previous year: one).

Absenteeism

In %	2023	2022	2021
Rate	41	42	45

Next steps

We have cooperated with health insurance companies since 2022 and make use of their services. Moving forward, we will continue to expand this collaboration. We will also continue to conduct regular assessments of occupational health and safety requirements among the staff. NFON's range of services are to be transferred to an appropriate healthcare management system in the future and made available to all employees.

¹² Data for NFON AG and DTS.

¹³ For reasons of technical processes, information as at 15 March 2024.



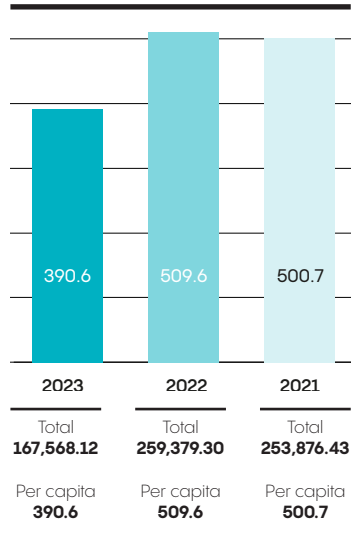
Our goal

Education and training

Our goal is essentially to continually support and further train our staff and, in particular, to retain them at our company in the long term.

TRAINING EXPENSES

as at 31.12 / EUR



Average expense for employees of an organisation during the reporting period for education and training (EUR) in total and per capita

Education and training

Relevance

For technology companies such as NFON, it is crucial that the employees continually develop their skills, as a rapid pace of innovation and shorter innovation cycles are increasingly becoming factors for achieving success. Regular training courses, continuous professional development programmes and certificates enable employees to continue to work at the cutting edge of technology and to develop innovative solutions. This not only strengthens the company's competitiveness, but also promotes an internal culture of innovation and creativity.

Measures¹⁴

All employees can access training and development offers at NFON, for example in the form of practical training courses. Training and development is divided into mandatory training and voluntary training, for example Scrum Master or Agile Coach. We support our employees in optimally developing their individual potential and achieving their personal career goals. NFON provides support for specific professional training when this is agreed. In addition, our employees can take advantage of further training measures in line with their tasks. Mandatory training includes training in risk management, compliance and workplace safety. Further training focuses in particular on data protection and IT security regulations. All employees must complete this mandatory training once a year. Employees in relevant functions also receive anti-corruption training. Managers receive special training to improve their leadership skills. NFON offers work experience for pupils and apprenticeships.

Next steps

We will review our measures in the area of education and training in 2024. And we will adjust existing measures or introduce new ones where necessary. Moreover, we are constantly working on the development of our NFON learning platform.

¹⁴ Presentation not possible on data protection grounds: number of employees who took educational leave



Our goal

Community involvement

We want to play a role in society to advance digitalisation for disadvantaged young people and open up educational opportunities for them.

Community involvement

Relevance for the company

With Agenda 2030, the global community came together under the aegis of the United Nations and committed to 17 global goals for a better future. The guiding principle of Agenda 2030 is to ensure a decent standard of living worldwide while also protecting the natural foundations of life in the long term. Economic, environmental and social aspects have to be taken into account here. Agenda 2030 underscores the joint responsibility shared by all actors. At NFON, we also want to fulfil our responsibility and give back some of what we receive.

Measures

Charitable donations

In 2023, we supported charitable organisations through direct financial donations totalling around EUR 7,100.

Social projects

We have found a suitable partner for our community involvement In SOS Children's Villages worldwide. Its global presence and its commitment to vulnerable groups, education and digitalisation has won us over. One important project is "Rafiki for Youth", part of the initiative ICT4D (Information and Communications Technologies for Development) of SOS Children's Villages. A digital mentoring assistant supports young people on their way into working life. Our employees played an active part in its development and support the project through their time. We are proud to be playing a role in boosting the employment prospects of youths and improving the digital infrastructure in the SOS Children's Villages. Further information can be found at the [website of SOS Children's Villages](#).

Rafiki for Youth: A text-voice assistant that SOS caregivers and the educational staff and young people in the SOS Children's Villages programmes can access to find solutions to day-to-day challenges related to care, employability and physical health. It offers easy access (24/7) for users with a mobile device. Similar to a virtual employee, the system provides answers based on artificial intelligence (AI) and machine learning. Users are also supported by "real" employees. Rafiki is a self-learning system based entirely on the needs and collective knowledge of its users.

YouthLinks – the virtual platform: YouthLinks enables youths from various SOS programmes to get in contact simply and directly with mentors from business and to gain a foothold in the world of work. Tips on preparing for a job interview or creating a CV, access to job offers or specialist online support – youths can get the help they need. YouthLinks is also a kind of database in which young people can find information that will help them to prepare for entering the labour market.

Next steps

Social projects

We aim to develop long-term partnerships with charitable organisations in order to produce a sustainable impact in the communities that we support. At the end of 2023, we further expanded our collaboration with SOS Children's Villages worldwide and support the YouthLinks project. The focus here is on supporting young people. The online platform is used to build a bridge between young people looking for work and companies. As a responsible company, we recognise the importance of supporting young people in developing their skills and talent. That is why our employees are actively involved as mentors and trainers in order to help the young people supported by the SOS Children's Villages programmes, to develop their potential and improve their prospects for the future. We are additionally continuing our financial support in order to ensure that the SOS Children's Villages can in turn continue the organisation's important work. Our partnership with SOS Children's Villages is another example of our long-term commitment to social responsibility and sustainable development.

Charitable donations

We will enhance our work to review and further develop our donations policy. Our aim is to establish a clear and transparent guideline that steers our contribution to social and environmental concerns effectively and reflects our company's values. We will also review the options for donations in the current financial year in order to ensure our donations are used effectively and sensibly to create sustainable benefits.

Further information can be found on the [YouthLinks web page](#) of SOS Children's Villages.



07 Governance

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Product responsibility	58

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Governance



Our goal Compliance

Our Group-wide compliance programme is intended to ensure that statutory regulations, internal company policies and ethical business practices are upheld.

Good and transparent corporate governance ensures responsible management and control of the company geared towards value creation. Our corporate governance structure does more than simply ensure compliance with applicable regulations, laws and standards. We provide further information in the "Governance" section of our [annual report](#) and in the [Governance](#) and [Compliance](#) pages on our website.

Compliance

Relevance for the company

The aim of compliance is to prevent risks to NFON and thus to protect the company. Breaches of compliance regulations can have far-reaching implications for us.

Measures

Compliance management and culture

We firmly believe that a company's compliance culture is what determines the success of compliance. Our compliance codes are established and recognised as standards. We expect all employees to abide by these compliance principles. A major role here is played by our executives and the Management Board, who exemplify and communicate our values and attitudes both within the company and to the outside world.

The Compliance Officer (CO) reports directly to the CEO and manages the development of our global compliance organisation and compliance management system. The Compliance Officer reports to the Audit Committee of the Supervisory Board on the status of the compliance programme and on any major developments at least once a year. The Management Board informs the

Audit Committee immediately of any important events. Our Group-wide compliance programme is designed to ensure that statutory regulations, internal company policies and ethical business practices are upheld. These standards are enshrined in our Code of Conduct and are binding for all employees and executives in their day-to-day work. NFON's compliance programme is based on our company values and voluntary commitments as well as international standards. At the heart of our compliance programme is the standardised global NFON Code of Ethics (also NFON Code of Conduct), which all employees and executives undertake to uphold. The NFON Code of Ethics describes our requirement for all NFON employees to act responsibly when dealing with business partners, public officials, other employees and society. The document is available in German and in English and, in addition to corruption and antitrust law, covers issues such as human rights, labour and social standards, conflicts of interest, whistleblowing and data protection. Case studies, frequently asked questions and links to further information offer our employees and executives guidance in these areas. The related internal online platform provides up-to-date content to all employees and executives worldwide at all times, including videos and links to further specialist departments and guidelines and direct access to experts. Another new platform for publishing Group-wide binding governance documents (policies, corporate requirements) has a search function that makes it easier to find relevant regulations.

Meeting compliance standards is the basis of responsible corporate governance. Entrepreneurial thinking is one of our company values. It is our firm conviction that complying with these standards plays a key role in safeguarding the long-term success of our company. The primary goal of our compliance programme is to prevent violations from the outset.

POLICIES AND GUIDELINES

Responsible corporate governance and legislation

- Group corporate governance statement
- NFON Code of Ethics
- Whistleblowing
- Quality
- Risk management
- Signatures
- Disguised employment
- Document control
- Guidelines for the software development process

Employer

- Travel, IT
- Employee training

Information security and data protection

- Mobile devices
- Information security
- Passwords
- Clear desk and screen
- Physical security
- Cryptography
- Classification of information
- Acceptable use of assets
- Data protection concept

Environment and climate

- Company cars

Compliance training

Mandatory online training and workshops are a key element in preventing compliance violations. All employees and executives must attend basic, refresher or specialist compliance training sessions, for example on compliance, IT security or data protection regulations, within set deadlines. The training documents and formats are to be frequently updated to take account of the specific risks affecting individual target groups and business units. As at the reporting date of 15 March 2024, 74% of our employees who were scheduled to take part in basic compliance training had completed this. Special training was completed by around 72% of the employees for whom it was intended. In total, 73% of our employees took part in a compliance training programme in the 2023 reporting year.¹⁵ The recertification process is automatically initiated by the learning platform system.

Conflicts of interest

We take any potential conflicts of interest seriously. A conflict of interest is when an employee's professional opinion could conflict with their personal interests. Our employees must avoid situations of this kind. They should also report any conflicts of interest to their supervisor and document this. Conflicts of interest are in principle addressed directly between the employee(s) involved and their supervisor. However, they can also be passed on to HR, the legal department or the CO. Employees, especially members of management and the Supervisory Board, must act solely in the interests of the company. They do not pursue personal interests nor do they grant unfair advantages to third parties. It is ensured that charitable donations to and sponsorships of other organisations are not used to conceal bribery.

We support the UN's Guiding Principles on Business and Human Rights and work constantly on refining our internal policies and processes in line with these principles. For example, our [NFON Code of Ethics](#) also stipulates compliance with international labour and social standards. We are also committed to upholding human rights and tackling corruption outside our company. We maintain consistently high standards and levels of integrity in tax issues.

¹⁵ For reasons of technical processes, information as at 15 March 2024.

Whistleblowing

It is particularly important to us that our employees actively seek advice at an early stage if they are uncertain about anything. Executives and the CO are on hand here. An independent external ombudsman is responsible for the [whistleblower hotlines](#). Reported cases are recorded and processed centrally at Group level. The hotline is also available to the public. All issues are recorded using defined criteria, properly investigated in accordance with internal processes and answered as quickly as possible. The results of any investigations and any measures put in place are documented accordingly and included in internal reporting. Our external hotline did not receive any reports in 2023. We will closely investigate all cases of suspected misconduct that come to our attention. Where necessary, we will also take countermeasures specific to the individual case. These can include for example improved monitoring mechanisms, additional information and training, clarifying and expanding internal regulations and, where applicable, disciplinary measures.

Next steps

Compliance is an area that is characterised by constant change, and an essential task is therefore to continually review and update existing guidelines and procedures in order to ensure that we fulfil the current legal requirements. It is therefore important also to review the compliance strategy on a regular basis and to adjust it when necessary in order to respond to new legal requirements or business developments.



Our goal Data protection

Our goal is to guarantee a uniform, company-wide standard for processing personal data. We view data protection not only as a legal obligation but as a collective responsibility for all departments and processes.

Data protection and information security

Relevance

We process a high volume of information and personal data, such as inventory and traffic data, in the course of our business activities. Data protection and information security are the foundation of relationships with our customers and partners and are therefore highly relevant. Business secrets, company information and employee and customer data are extremely important to us. That is why we have defined goals for the areas of data protection and information security.

Data protection

Measures

Data protection management system

Compliance with national and international regulatory obligations such as the General Data Protection Regulation (GDPR), local data protection laws and telecommunication laws is guaranteed by NFON and is ensured by the use of a data protection management system (DMS) that is evaluated, adjusted and expanded on an ongoing basis.

Involvement of the data protection department in product development processes

The data protection team, which comprises the Group data protection officer, several data protection experts and the data protection coordinator at our locations, monitors and advises all departments and locations on all issues relating to data protection law. These include questions about product development in accordance with "privacy by design" and "privacy by default" principles, monitoring processes for high risks and carrying out data privacy impact assessments (DPIA), as well as reviewing and entering into order processing contracts and joint responsibility agreements. In this context, a joint responsibility agreement was also entered into within the Group in 2022 that regulates liability within the Group and the respective processing activities.

Company-wide, clear and comprehensible regulations

To support compliance with requirements under data protection law and make these more transparent for our employees, we issue guidelines, directives and FAQs in clear and simple language that everyone can access on the intranet.

Raising awareness and prevention through regular data protection training

All employees at our company play a part in lawful data processing. They regularly learn about data protection and information security in basic training sessions to raise their awareness. Since 2022, our employees have had access to an automated e-learning training session on data protection in all relevant languages. They receive a certificate after successfully completing the session and passing a test. Both ad hoc and independent subject and area-specific training was also provided where appropriate. Members of the data protection team also undergo regular subject-specific training.

Communication with regulatory authorities

We maintain regular contact with regulatory authorities to evaluate or discuss current and/or critical data protection matters. We also communicate with authorities if we are required to report a data protection violation under the GDPR or the regulatory authorities send us requests from data subjects. The data protection team immediately follows up on and reviews all internal and external reports and complaints regarding potential violations. There were three reportable data protection incidents in 2023. NFON did not report any substantiated complaints from a regulatory authority in the 2023 reporting year. A total of four requests for information were received from data subjects, which were answered promptly and which did not lead to objections from the data subjects.



Our goal Information security

Information security is a top priority for NFON. We aim to meet the CIA goals (confidentiality (C), integrity (I), availability (A)) in all our processes and systems.

Ensuring proper data deletion by way of a deletion concept

Our deletion concept is regularly reviewed, adjusted and expanded in the course of the introduction of new tools in order to comply with and enforce the statutory deletion and retention periods. We thus ensure that data is deleted after the end of the current statutory periods.

Data and cyber security

The importance of data security in the Group and of preventing unauthorised access by external third-parties to company and customer/partner data is rising steadily. We work continually on the security of our digital products and systems to successfully prevent information security risks for our customer, partners and the Group. Regular monitoring is also used both to identify vulnerabilities and points of attack and to assess and, where necessary, improve the effectiveness of measures that are implemented. This monitoring helps ensure that systems are state of the art at all times. As another security precaution, all our cloud servers for our products are located in Germany. Various security measures and functions at our data centres ensure system availability.

Increasing the resilience of our IT infrastructure was also a key topic in 2023. Transparency is a top priority for us, which is why we have established a [Trust Center](#) on our website to demonstrate that our responsible behaviour in the area of compliance is especially important and needs to be transparently communicated outside the company. The Trust Center now features bundled information on data protection, security, compliance and quality management at NFON.

Information security

Measures

Information security management system

To effectively meet the CIA goals, our company was certified by independent auditors in accordance with the internationally recognised ISO 27001 standard in 2021. Our efficient and effective information security management system (ISMS) is reviewed and audited by independent bodies each year. The last review was in 2023. Alongside the checks performed by external bodies, we also carry out ongoing self-monitoring. The ISMS is implemented and refined within the framework of the plan-do-check-act (PDCA) cycle in this process. All our policies are documented in simple language and available on the intranet to all employees. The accuracy, availability and confidentiality of data and information are of immense importance to us. To fulfil these premises, we follow the CIA principles: information is made available only to authorised persons in line with the permission concept. This allows us to ensure that business-related and sensitive data and information remains confidential and to protect the data and information against loss. Data and information can be amended only by authorised parties. It is regularly checked to ensure it is accurate and complete. This guarantees the integrity of data and information. Where business requirements and company processes require data and information, this is provided to the management, employees, business partners and customers in good time. In terms of availability, our goal is to provide information to the extent required and agreed and within the necessary, agreed time frame without restriction.

Protection of information and personal data entrusted to the company

We aim to protect our employees, partners and customers against constant external threats¹⁶. Cyber security strategies are essential here. As the confidentiality and integrity of information and personal data are particularly important to us, we do not simply comply with existing standards but also develop them further. Examples include:

- Regular spot checks on threats, e.g. from phishing attacks
- External pentesting service providers that regularly check our application portfolio for vulnerabilities
- Establishment and development of internal infrastructure and training on issues such as Open Web Application Security Project (OWASP) Top 10 and pentesting frameworks
- Measures enabling internal teams to conduct pentests, either on their own or with the support of internal specialists
- Development of strategies and guidelines that allow external security researchers to report incidents

In addition, we successfully gained certification under the ISO 9001 standard in 2023 so that we can demonstrate to our customers and partners the importance of our quality assurance through process optimisation. A further milestone was reached when we successfully obtained C5 attestation (type 1). This ensures that we fulfil the minimum requirements for information security for cloud services in accordance with the Cloud Computing Compliance Criteria Catalogue (BSI C5) of the Bundesamt für Sicherheit in der Informationstechnik (BSI – Federal Office for Information Security). This attestation provides cloud customers with an important guide when they are selecting a provider.

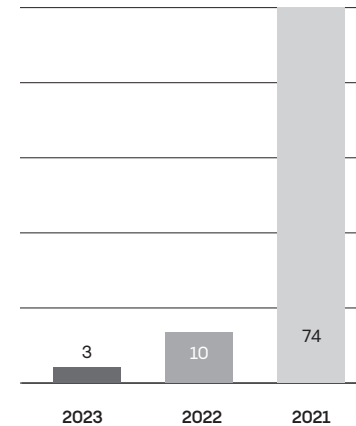
¹⁶ Examples of external threats: criminal attacks (hacker attacks, theft of data storage media, software manipulation), software problems (software errors, destruction of data storage media, system malfunctions), natural disasters, network disruptions.

¹⁷ Information on key performance indicators relates only to NFON AG, not to international subsidiaries.

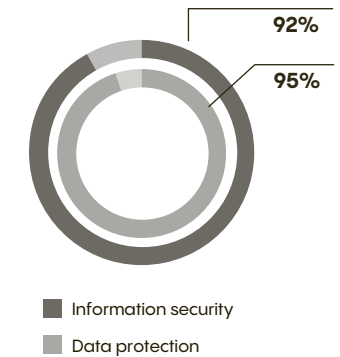
¹⁸ For reasons of technical processes, information as at 15 March 2024.

Data protection and information security performance indicators¹⁷

Number of security incidents reported



Number of training courses performed



As at the reporting date of 15 March 2024, 95% and 92% of our employees who were scheduled to take part in data protection or information security training had completed this respectively. This corresponds to around 98% of the total number of employees as at 31 December 2023.¹⁸

Certificates

ISO 27001

DIN EN ISO/IEC 27001:2017: ISO/IEC 27001 is an international standard for information security management that defines the requirements in this area. The certificate confirms that we meet the requirements and that we have suitable processes in place. We undergo regular reviews conducted by independent institutions so that we can retain this certificate.

ISO 9001

DIN EN ISO 9001:2015: ISO 9001 is an international standard for information security management that defines the requirements in this area. The certificate confirms that we meet the requirements and that we have suitable processes in place to provide a quality service. We undergo regular reviews conducted by independent institutions so that we can retain this certificate. Our focus here is customer satisfaction.

C5 attestation (type 1)

C5 attestation is a catalogue of criteria of the Federal Office for Information Security (BSI) that assesses the security architecture of a cloud service provider. On the back of extensive measures, NFON has obtained C5 attestation (type 1) and thus established itself as an ideal partner for security-conscious customers.

For more information: corporate.nfon.com/de/compliance

Next steps

Data protection and information security are business areas with ongoing, constantly developing requirements. Based on that, we have planned the following next steps:

Data protection

Our company-wide joint responsibility agreement will be revised and further developed in the course of the comprehensive transformation measures. Furthermore, we are optimising and adding contents to the [Trust Center](#) on our website. New processes will be created for testing and implementing systems in the area of artificial intelligence (AI) and the establishment of an AI skills centre will be actively monitored and supported.

Information security

Within the recertification process, we are switching our ISO 27001 certification to the ISO 27001:2022 standard. In quality management, we will aim to expand the scope in this year's monitoring audit of ISO 9001:2015. We are additionally preparing to fulfil and implement the NIS2 Directive. In addition, needs-based reviews for other possible ISO certificates are being conducted and the management systems are being prepared for these.

The introduction of security information and event management is being planned as an additional essential measure in the area of IT security in 2024.

NIS2 DIRECTIVE

Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148



Our goal

Sustainable procurement

We are careful to choose suppliers that are committed to the values of sustainable production and logistics and to human rights.

Sustainable procurement

Relevance

Innovation processes and value creation for our products are based primarily in Europe. We do not believe there is any risk of human rights violations such as child or forced labour at our locations. We depend on products with lengthy, complex supply chains only to a very limited extent and so these make only a minor contribution to the company's profit. Human rights and sustainable production and logistics take on greater significance as a result of working with partners, chiefly suppliers of hardware components that NFON itself requires or sells to its clients.

Measures

We carry out selective monitoring and take suitable measures to mitigate negative effects in supply chains. We also check our suppliers' supply chain mapping. All of the most important suppliers for our business have published their own sustainability principles. We conducted an extensive survey among our top 50 suppliers in the past financial year to ensure that they meet our highest quality and sustainability standards (including the NFON Code of Ethics). We covered around 60% of our purchasing volume with this survey.

Order and payment practices

At NFON, we endeavour to promote not only ethical, but also sustainable order and payment practices. Our purchasing guideline serves to create binding rules governing the procurement of all goods and applies to all employees. These rules support the purchasing process, which is mapped through SAP, reduce inefficiencies and improve the company's results. With our regulation that governs signatures, which is constantly reviewed by Purchasing, we ensure that contractual or financial obligations are properly checked and signed and that the communication with authorities proceeds correctly. Our payment guidelines are geared towards ensuring punctual payment of our suppliers while at the same time guaranteeing that fair business practices are adhered to. We pursue a transparent approach when paying invoices and endeavour to use paperless payment methods in order to minimise the use of paper and to reduce our environmental footprint.

We additionally advocate the promotion of payment targets that are fair and appropriate both for our company and for our suppliers. We recognise the importance of making payments by the due date to ensure the financial stability of our suppliers and therefore endeavour always to meet our obligations on time.

Next steps

Based on these findings, we are working consistently on further developing the survey and plan to repeat it at regular intervals. We are endeavouring to further enhance the efficiency and quality of our supply chain while at the same time meeting our sustainability goals. In addition, we constantly review our NFON Code of Ethics.



Our mission

We develop cloud systems for our users. Our aim is to make work smarter, not harder.



Our goal

Sustainable procurement

We are careful to choose suppliers that are committed to the values of sustainable production and logistics and to human rights.

Product responsibility

Relevance

The Bitkom climate protection study published in March 2021²⁰ clearly shows that digitalisation is a key factor for climate protection. According to this study, which was conducted by Accenture on behalf of Bitkom, digital technologies can make a significant contribution of 41% to Germany's 2030 climate target.

This illustrates the considerable role that digitalisation can play in reducing emissions and achieving environmental goals. Substantial gains in efficiency can be generated in particular in the field of work and business. For example, the study shows that between 14% and 16% of traffic and primary energy emissions can be saved through mobile work using collaborative digital solutions and cloud sharing platforms. These figures underline the potential that lies in the use of digital technologies for sustainable development. It is therefore of great importance that companies not only drive forward their own digital transformation, but also develop innovative solutions to make a positive contribution to climate protection.

The most important technologies, according to Bitkom's statements, are specified below, some of which form the core of the products and services that we offer:

- Cloud-based platforms (platform as a service)
- Connectivity and exchange through smart devices
- Telecommunications platforms that enable collaboration
- Video conferencing
- Virtual meetings
- Voice communication via the Internet Protocol (VoIP)

We want all people to be able to communicate and work with each other without any hassle. Our products and services are designed to offer our customers an added value in their business communications. High quality is the basis for this as well as for a high level of customer satisfaction and sustainable and profitable company growth. Moreover, products with a long service life make a positive contribution to environmental footprints.

²⁰ https://www.bitkom.org/sites/main/files/2021-10/20211010_bitkom_studie_klimaeffekte_der_digitalisierung.pdf

Measures

Product awards and certificates

We want to develop products and services that offer innovative, high-quality solutions and services. Our efforts have been and continue to be recognised by a number of product awards and certificates. Some of the most important awards and certificates that we have received include:

Feedback process

NFON regularly receives feedback from customers in the course of providing the product portfolio we offer. Some of this feedback can involve complains in individual cases. NFON takes these complaints very seriously and disclosed the relevant processes to the auditor in the course of the certification under ISO 9001:2015. Our professional handling of these complaints has been confirmed by the relevant certification. ISO 9001 is an international standard for quality management systems that defines requirements for organisations in order to ensure that they meet the customers' needs and also fulfil the legal and regulatory requirements. Sections 7.2.1 and 8.2.1 of ISO 9001 regulate some of the requirements relating to customer complaints and feedback.

Next steps

In view of this requirement and the goals we have set ourselves, a key strategic pillar for us is the continuous development of our products and services. We are currently in the process of implementation customer assessment methods such as the net promoter score (NPS) and are planning to integrate the results regularly in our reporting. We are committed to continuous improvement and look forward to supporting our partners and customers with high-quality solutions and excellent service.

Overview of awards (extract)

2018	2019	2020	2021	2022	2023	2024
ICT: Channel Champions (Telecommunications)	<p>"Product of the Year" for NFON Cloudya FOX FINANCE VISUALS</p> <p>ICT: Channel Champions (Telecommunications)</p>	<p>Frost & Sullivan Radar 10 Growth and Innovation Leaders funkschau: Product of the Year (2nd)</p> <p>ICT: Channel Champions (Telecommunications) Comms Council Award</p>	UK: Best Multi-National Solution	ICT: Channel Champions (Telecommunications)	connect professional: Products of the year 2023 (communication and software, Cloudya)	<p>CRN Channel Master 2024 Certificate</p> <p>connect professional: Cloud PBX product test (test assessment very good)</p>

Functionalities of our Cloudya core product:



Accessible settings Easily adjust font size to improve readability.



Keyboard accessibility The main navigation is optimised for comfortable operation using common keys and shortcuts.



High contrast and colour contrast Improved readability for everyone, in all important workflows.



Video layouts Various options can be selected for the video gallery.



Highlighting of the active speaker People who are presenting or speaking can be automatically highlighted in video meetings.



Participant responses Real-time responses during a video meeting with a large number of non-verbal responses possible.



Blurred background Reduce cognitive overload through better concentration on the people in meetings and conferences.

08 Additional information

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i **Interactive table of contents** You can click on the individual topics to go to the relevant page.

Glossary

BSI C5 – BSI C5 attestation refers to a certification procedure provided by the Federal Office for Information Security (BSI) in Germany. It is used by cloud service providers as verification that they meet certain security requirements. The abbreviation “C5” stands for “Cloud Computing Compliance Criteria Catalogue” and includes criteria that are relevant to the security of cloud services.

Channel – Sale channel, here especially indirect sales via partners.

Cloud – The cloud refers in general to a group of remote computers and servers that are connected over the Internet and can jointly provide resources such as storage, processing power and applications. Users can access these resources via the Internet without having to physically access hardware or infrastructure. The cloud enables users and businesses to scale and use data and applications quickly and flexibly without having to take responsibility for the administration and maintenance of the underlying infrastructure.

Compliance – This is an important component of corporate governance, and is understood to refer to compliance with laws and directives as well as voluntary codes within the company.

Contact centre as a service (CCaaS) – CCaaS is a software-as-a-Service (SaaS)-based application that helps customer service organisations to fully manage customer interactions across many communication channels (multichannel or omnichannel).

Contact centre solutions – A contact centre is a central unit of a company or organisation that is responsible for managing incoming and outgoing communications. It is a place where customer enquiries and problems can be dealt with via various channels such as telephone, e-mail, chat, social media, etc. Contact centres typically use specialised software tools such as customer relationship management (CRM) systems, ticketing systems and automated telephony systems to manage and optimise the interaction with customers. The objective of a contact centre is to promote customer satisfaction and loyalty and to make customer support more effective and efficient.

CXO – Derived from the designation used to denote **management** functions of a company. The C stands for chief, the O for officer. As there can be different chief officer functions in a company, the X stands for the variable. In the case of NFON, these are currently the Chief Commercial Officer (CCO), the Chief Sales Officer (Germany) (CSO) and the Chief **Product** Officer (CPO).

Data protection – Is a fundamental right and described the protection against the abusive processing of personal data as well as the protection of the right to informational self-determination.

Diversity – Diversity within the workforce in terms of gender, ethnic social background, age, religion, sexual orientation and identity as well as physical and mental abilities. At the same time, it describes the diverse perspectives, values, professional experience and skills of the employees.

Enablement – The process of preparing companies for the cloud and providing them with the right infrastructure

Environment, Social, Governance (ESG) – This refers to factors that investors and businesses consider in order to assess E, S and G-related risks and opportunities. ESG measures environmental and social impacts and how a business is run. ESG is an analytical approach that uses data to assess businesses according to these factors. It is generally used to evaluate companies and investments.

ESG rating/ranking – Assessment of sustainability, of a company for example. The level of sustainability is assessed on the basis of the degree to which ESG criteria are fulfilled.

Greenhouse Gas Protocol – A globally recognised standard for quantifying and management greenhouse gas emissions.

IP telephony – IP telephony (also known as VoIP – Voice over Internet Protocol) is a technology that allows voice and multimedia communication to be transmitted via the Internet protocol (IP). In contrast to traditional telephone systems, which use the public telephone network infrastructure, IP telephony converts voice signals into digital data packets and transfers them via the Internet or a private IP network. IP telephony can be used on various devices such as computers, smartphones, IP telephones and special hardware devices.

ISO 9001 – ISO 9001 is an internationally recognised standard for quality management systems. It defines the requirements for effective quality management in organisations and offers a framework for the continuous improvement of processes, products and services. Companies that receive ISO 9001 certification have demonstrated that they have established a quality management system that is focused on customer orientation, process optimisation and continuous improvement.

ISO 27001 – ISO 27001 is an international standard for information security management systems (ISMS). It defines requirements for the management of information security in organisations and aims to identify, assess and deal with risks in order to ensure the confidentiality, integrity and availability of information. Companies that receive ISO 27001 certification have demonstrated that they have implemented appropriate security controls and measures to protect information and to manage the risks associated with information security.

Key performance indicator (KPI) – These are used to measure specific developments and trends in a company.

Meet & Share – This is an NFON product for video calls with the option of not only watching the video but also sharing the screen.

Net promoter score (NPS) – This is a key figure used to measure customer satisfaction and loyalty. NPS is based on a simple question to customers: “How likely are you to recommend our product/service to a friend or colleague?” Customers can answer on a scale from 0 to 10.

Private branch exchange (PBX/Cloud PBX) – Private branch exchange is a general term for a telephony system for businesses that offers multiple incoming and outgoing lines, call forwarding, voicemail and call management functions. If this is operated over a cloud (see “Cloud”), this telephony system is referred to as a “cloud PBX”.

Science Based Targets initiative – A partnership between the Carbon Disclosure Project (CDP), the United Nations Global Compact, the World Resources Institute (WRI) and the World Wide Fund for Nature (WWF). It defines methods for establishing science-based targets in accordance with the latest findings of climate science and also defines and promotes best practices for emission reductions and net zero targets.

Scope 1–3 (in accordance with GHG Protocol) – As part of the reporting on greenhouse gases on the basis of the Greenhouse Gas (GHG) Protocol, emissions are divided into three scopes.

Security information and event management – Security information and event management (SIEM) combines the two concepts of security information management (SIM) and security event management (SEM) for the real-time analysis of security alarms from and applications and network components. SIEM thus serves the computer security of an organisation and is a software product that can be installed centrally or used as a cloud service.

SIP trunk technology – SIP trunking refers to a telephone line or system connection that is provided using the standard protocol SIP (session initiation protocol) via an IP connection. This technology enables companies to transmit telephone calls using the Internet protocol (IP) instead of traditional telephone lines. Using a broadband Internet connection, companies can make and receive calls without requiring separate physical telephone lines.

Stakeholders – Groups and representatives of stakeholders/interest groups.

Symmetric digital subscriber line (SDSL) – A symmetric digital subscriber line is a DSL technology that provides access to a public digital network.

Unified communications (UC) / Unified communications as a service (UCaaS) – Unified communications are an integrated solution that combines various communication methods in one platform to improve collaboration and information exchange. UC systems enable various communication channels such as voice, video, chat, e-mail and collaboration to be used in real time via a single interface.

UC also integrates various functions such as voice and video calls, teleconferences, messaging and file transfer in a single application or platform. Through the integration of communication channels and functions, UC offers a seamless and efficient way to collaborate and improves the productivity and effectiveness of teams and organisations.

Unified communications and collaboration (UCC) / Unified communications and collaboration as a service (UCCaaS) – Unified communications are usually offered with functionalities for collaboration. These include sharing screens, collaborating on a single document and shared use of software such as whiteboards. See also “Unified communications”.

UCCaaS is a software-as-a-service (SaaS)-based application that offers programs in the UCC area as a service. See also “Unified communications” and “Unified communications and collaboration”.

Abbreviations

AI – Artificial intelligence

BSI – German Federal Office for Information Security

CaaS – Contact Center as a Service

CapEx – Capital expenditure

CCF – Corporate carbon footprint

CC Hub – Contact Center Hub

CDP – Carbon Disclosure Project (previously)

CPaaS – Communications Platform as a Service

CSRD – Corporate Sustainability Reporting Directive

CSR-RUG – German CSR Directive Implementation Act

CO – Compliance officer

DCGC – German Corporate Governance Code

DMS – Data protection management system

DNSH – Do no significant harm

DPIA – Data protection impact assessment

ESG – Environment, social, governance

EU – European Union

FTE – Full-time equivalents

GDPR – General Data Protection Regulation

GHG – Greenhouse gas

GRI – Global Reporting Initiative

HC – Head counts

KPI – Key performance indicator

NP – Natural person

NPS – Net promoter score

OpEx – Operational expenditure

OWASP – Open Web Application Security Project

PBX – Private branch exchange

PDCA – Plan – do – check – act

PHEV – Plug-in hybrid vehicle

RMS – Risk management system

SaaS – Software as a Service

SBTI – Science Based Targets initiative

SDG – Sustainable Development Goals

SDSL – Symmetric digital subscriber line

UC – Unified Communications

UCaaS – Unified Communications as a Service

UCC – Unified Communications & Collaboration

UCCaaS – Unified Communications & Collaboration as a Service

UN – United Nations

VATM – Verband der Anbieter von Telekommunikations- und Mehrwertdiensten e.V. (Association of telecommunications and value-added services providers)

VoIP – Voice over Internet Protocol

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