

IONOS GROUP SE

Supplementary Information on the IONOS Group SE Sustainability Report 2024

PRIVACY COMMITMENT AND DATA PROTECTION PRINCIPLES

IONOS Group SE is fully committed to respecting the right to privacy. Our data protection management operates under a companywide internal data protection policy, that is aligned with the EU General Data Protection Regulation (GDPR). This is complemented by the publicly available data protection policies of our subsidiaries.

Our data protection policies provide transparent information on:

- The purpose and scope of data collection,
- Use by third parties, including processors,
- Rights of data subjects, such as access, correction, and deletion of their data,
- Technical and organizational measures (TOMs) for data security, including access controls and procedures for pseudonymization and de-identification.

In accordance with the GDPR, we follow the principle of “Privacy by Design and by Default.” Data protection aspects are considered through data protection impact assessments already during the development phase of new products and services.

Handling of Customer Data

IONOS collects personal data solely to fulfill contractual or legal obligations and to improve our services. Disclosure to third parties occurs only when necessary for contract fulfillment and always in compliance with applicable data protection regulations

In addition, IONOS is committed to deleting personal data after a clearly defined period, which depends on the specific usage context and legal requirements. Collection of personal data by third-party tools occurs only if there is a legal basis.

Data Protection in Practice

Data protection is a fundamental part of our company culture. Employees receive regular training on handling personal data. In addition, they have access to various technical tools to ensure that our systems are used in compliance with data protection requirements. More information can be found in our sustainability report.

The data protection policies of our brands are available on their respective websites:

- [IONOS](#)
- [STRATO](#)
- [Arsys](#)
- [Fasthosts](#)
- [Home.pl](#)
- [InternetX](#)
- [SEDO](#)
- [United Domains](#)
- [World4You](#)
- [WE22](#)

Auditing of Information Security and Data Protection

Our ISO 27001 and IT Grundschrift certified as well as BIS C5 attested Information security management system (ISMS) is checked annually through external audits. Additionally, the effectiveness of the ISMS and our data protection management are tested internally through audits, penetration tests and for instance phishing campaigns, which happen regularly.

Through our business partner code of conduct IONOS requires business partners to uphold the protection of the confidentiality, availability and integrity of all information and in particular personal and sensitive data. This is also checked through questionnaires which are sent to the suppliers, examined and in case of gaps can lead to audits by our security experts.

Information Security Management System Coverage

Except for our subsidiary Sedo, our ISMS covers all of IONOS Group SE, which results in a coverage of 97% per employees.

Our Certificates and Attestation can be found [here](#).

EMPLOYEE DEVELOPMENT AND FEEDBACK PROCESSES

At IONOS, we place great importance on the continuous personal and professional development of our employees. All employees participate annually in the structured Talent Review Process (TRP). For this process, employees first complete a self-reflection and may also provide an evaluation of their manager. This self-reflection is then combined with feedback from the manager during the annual employee review.

As part of these discussions, a development plan is created, and the achievement of personal and company-wide objectives—linked to our employees' variable compensation—is documented. By closely connecting performance, feedback, and incentive systems, we promote a performance-oriented and transparent corporate culture.

Apprenticeships and Young Talent Development

As a responsible employer, IONOS is also strongly committed to training young talent. Together with our parent company, United Internet, we offer structured apprenticeship programs and dual study opportunities in various professions, including:

- IT Specialist (Application Development / System Integration)
- IT System Management
- Dialogue Marketing
- Marketing Communication
- Office Management

Since 2020, United Internet has been certified as a "Best Place to Learn"—a quality seal for excellent corporate training, recertified every three years. Interns and working students are also an integral part of our team.

DIVERSITY AND WORKPLACE CONDUCT

IONOS is committed to fostering a diverse and inclusive workplace, free from discrimination and harassment. Training on discrimination and harassment are provided to all employees as part of broader Code of Conduct training, with 77.6% of employees completing this training in 2024. In line with this commitment, we have launched our Anti-Harassment Policy, which provides a clear framework for preventing and addressing inappropriate behavior. The policy details procedures for reporting incidents, outlines the investigation process, and highlights support services available to affected employees, and it is shared with all employees across the company.

Employees in Germany also complete the AGG e-learning program, which covers the German General Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz) and includes training on the Anti-Harassment Policy, helping them contribute to a respectful and inclusive workplace.

HEALTH AND SAFETY

IONOS places great importance on maintaining a safe and healthy working environment. All employees are covered by a health and safety management system established in accordance with legal requirements, ensuring that workplace risks are systematically identified and managed. The rate of work-related accidents is 1.36 per million working hours, and injuries and illness-related absences resulted in a total of 186 lost workdays. Through these measures, we strive to protect the well-being of our employees and promote a culture of safety across the company.

FREEDOM OF EXPRESSION

IONOS explicitly respects and supports the right to freedom of expression, recognizing its importance in enabling open communication and digital innovation.

While we do not moderate content directly as an infrastructure provider, we ensure that:

- Our services are not used to unlawfully restrict lawful expression,
- Customer data is processed only under strict legal bases and never for censorship purposes, and
- our code of conduct promotes a culture of open dialogue, with our whistleblowing tool Integrity Next to report any undue interference with freedom of expression.

For all additional information on sustainability at IONOS, please refer to our [website](#) and our [sustainability report](#).