

GRI Report 2021

Bertelsmann Corporate Responsibility Information in accordance
with the Global Reporting Initiative (GRI) Standards

www.bertelsmann.com/responsibility

BERTELSMANN

About this Report

Since 2011, Bertelsmann's Corporate Responsibility (CR) reporting has followed the international standards of the Global Reporting Initiative (GRI), the world's leading framework for sustainability reporting by international companies and organizations, and known since 2016 as the GRI Standards. This report was created in accordance with the GRI Standards: Core option. Supplementary information in conformity with the sector-specific Media Sector Disclosures (MSD) are also included. Hyperlinks lead to further information, facts and figures about the responsible conduct of Bertelsmann and its corporate divisions on the Bertelsmann Website. The report's content was selected based on a relevance analysis carried out with internal and external stakeholders to determine the CR priorities of Bertelsmann.

Bertelsmann also fulfills its obligation to produce an annual Communication on Progress as a participant in the UN Global Compact with its GRI reporting. A separate column in the table highlights the relevant reporting content for each principle.

In March 2022, Bertelsmann also published a [Combined Non-Financial Statement in the Bertelsmann Annual Report 2021 \(pp. 44-52\)](#), which complies with the German CSR Directive Implementation Act.



Dear readers,

For Bertelsmann, 2021 was a year of repeated record results, significant growth and great progress in strategy implementation. Our 145,000 employees worldwide played a major role in this. I am very grateful for their outstanding commitment.

At Bertelsmann, we see ESG as an opportunity. We have paved the way for an ambitious Bertelsmann ESG Program (2021–2023) with eight ESG priorities: creative/journalistic independence & freedom of expression; content responsibility; fair working conditions; diversity, equity & inclusion; health & well-being; learning; responsibility in the supply chain; and climate change. With the Group-wide implementation of about 150 measures, we aim to meet the rising expectations of our stakeholders.

Bertelsmann will become climate neutral by 2030. Our climate strategy is in line with the 1.5-degree target of the Paris Climate Agreement and has been validated by the independent Science Based Targets initiative.

Thank you for your interest in our work. We welcome any suggestions or questions you may have at esg@bertelsmann.com.

Sincerely yours,

A handwritten signature in blue ink, which appears to read 'Thomas Rabe'. The signature is fluid and cursive.

Thomas Rabe

Chairman and Chief Executive Officer of Bertelsmann

PS: This report also serves as our annual Communication on Progress on the implementation of the UN Global Compact's ten principles.

GRI 102

General Disclosures



GRI Content Index

For the Materiality Disclosures Service, Global Reporting Initiative (GRI) Services reviewed that the GRI content index is clearly presented and the references for Disclosures 102-40 to 102-49 align with appropriate sections in the body of the report. The service was performed on the English version of the report. With the exception of the Media Sector Disclosures (MSD) and the “GRI 303: Water and Effluents 2018,” “GRI 403: Occupational Health and Safety 2018,” and “GRI 306: Waste 2020” standards, all of the GRI Standards listed in the following GRI content index were published in 2016.

GRI 101 Foundation 2016

GRI	Disclosure	UNGC
101	Foundation	
101	Bertelsmann has taken the content of “GRI 101: Foundation 2016” into account in compiling the GRI Report 2021.	

GRI 102 General Disclosures 2016

GRI	Disclosure	UNGC
102	Organizational Profile	
102-1	Name of the organization Bertelsmann SE & Co. KGaA	
102-2	Activities, brands, products, and services Bertelsmann is a media, services, and education company that operates in about 50 countries around the world. It includes the entertainment group RTL Group, the trade book publisher Penguin Random House, the magazine publisher Gruner + Jahr ¹⁾ , the music company BMG, the service provider Arvato, the Bertelsmann Printing Group, the Bertelsmann Education Group, and Bertelsmann Investments, an international network of funds. The company has 145,000 employees and generated revenues of €18.7 billion in the 2021 financial year. Bertelsmann stands for creativity and entrepreneurship. This combination promotes first-class media content and innovative service solutions that inspire customers around the world. Media: Bertelsmann’s media businesses are based on the production and acquisition of high-quality information and entertainment content – resulting in audiovisual formats, books, magazines, music products, or digital offerings. With the exception of books and music, these products contain aside from editorial content advertising – an additional source of revenue beyond the revenues from sales and distribution. All these products are distributed physically or digitally, directly or through service providers. Since media businesses live by the diversity of the content produced and distributed, good networks of creative talent and content producers are a key success factor.	

GRI	Disclosure	UNGC
	<p>Services: Companies from a wide variety of industries rely on the portfolio of solutions offered by Bertelsmann’s services business – from telecommunication providers and energy providers to banks and insurance companies, as well as e-commerce, IT, and Internet providers. The core of this business comprises services that Bertelsmann delivers to the end customers of its clients (“B2B2C services”). Typical service offerings include supply chain solutions (SCS), financial services, and IT services. These services combine a variety of resources: staff resources, technology, and the use of natural resources in the form of energy and materials. While hardware and standard software are sourced from third-party suppliers, software solutions for specialized applications are also developed in-house. The services business also includes the listed customer experience company Majorel. In its print business, Bertelsmann processes materials such as paper and ink to produce media and advertising products for business customers – typically advertising flyers, books, catalogs, magazines, and brochures – using gravure, offset, and digital printing presses by third-party manufacturers. The most important raw material used in the CD, DVD, and Blu-ray replication is polycarbonate. In addition, various digital marketing services are offered, such as data-driven multichannel marketing.</p> <p>Education: With its digital learning and service offerings focusing on healthcare and university education, Bertelsmann is shaping contemporary, work-related learning. The business models in its education business are based primarily on the combined deployment of highly qualified employees and innovative technology.</p> <p>Bertelsmann does not offer products or services that are prohibited by law.</p> <p>More information on brands: see GRI 102-7.</p> <p><u>Corporate Profile</u></p> <p><u>Bertelsmann Annual Report 2021, pp. 5-6.</u></p> <p>¹⁾As of January 1, 2022, Gruner + Jahr is no longer reported as an independent corporate division. Since then, the publishing activities are part of the RTL Group division. Gruner + Jahr’s remaining activities are assigned to the Bertelsmann Investments division. This does not affect the reported figures in the GRI Report 2021.</p>	
102-3	<p>Location of headquarters</p> <p>Gütersloh, Germany.</p>	
102-4	<p>Location of operations</p> <p>Bertelsmann operates in the core business fields of media, services, and education in about 50 countries worldwide.</p> <p>More information on the core markets: see GRI 102-6.</p>	
102-5	<p>Ownership and legal form</p> <p>Bertelsmann SE & Co. KGaA is a capital market-oriented but unlisted company limited by shares.</p> <p><u>Shareholder Structure</u></p> <p><u>Bertelsmann Annual Report 2021, p. 6.</u></p>	

GRI	Disclosure	UNGC
102-6	<p>Markets served</p> <p>The geographic core markets are Western Europe – in particular, Germany, France, the United Kingdom – and the United States. In addition, Bertelsmann is strengthening its involvement in growth markets such as Brazil, India, and China.</p> <p>More information on the Group’s core business fields and customers: see GRI 102-2.</p>	
102-7	<p>Scale of the Organization</p> <p>The company has 145,000 employees and generated revenues of €18.7 billion in the 2021 financial year.</p> <p>RTL Group is one of the leading European television groups in the broadcasting, content and digital business, with interests in 67 television channels, 10 streaming platforms, 39 radio stations, global content production companies, as well as digital video networks.</p> <p>Penguin Random House is, based on revenue, the world’s largest trade book publisher, with more than 300 imprints across six continents. Each year, Penguin Random House publishes more than 16,000 new titles and sells more than 700 million print books, e-books, and audiobooks.</p> <p>Gruner + Jahr¹⁾ is a premium magazine publisher whose portfolio includes established brands such as “Stern,” “Brigitte,” and “Geo”; digital products in all publishing segments; and products and licenses, such as the “Schöner Wohnen” collection.</p> <p>BMG is an international music company with 19 offices in 12 core music markets, now representing more than three million titles and recordings.</p> <p>Arvato is an international service provider that develops and implements custom-made solutions for all kinds of business processes, for customers in a wide range of sectors in more than 40 countries. These include supply chain solutions (SCS), financial services, and IT services. The services business also includes the listed customer experience company Majorel.</p> <p>Bertelsmann Printing Group unites Bertelsmann’s printing activities. They include all the Group’s gravure, offset, and book printing companies in Germany, the United Kingdom, and the United States.</p> <p>Bertelsmann Education Group comprises Bertelsmann’s education activities. The digital education and service offerings are primarily in the healthcare sector, in the field of in-company training and development, as well as university education.</p> <p>Bertelsmann Investments comprises Bertelsmann’s global start-up investments. The activities are focused on the strategic growth markets of Brazil, China, India, and the United States.</p> <p>Revenues by division, region, and revenue stream: see GRI 201-1.</p> <p><u>Bertelsmann’s Corporate Divisions</u></p> <p><u>Bertelsmann Annual Report 2021, pp. 5-6</u></p>	

¹⁾ As of January 1, 2022, Gruner + Jahr is no longer reported as an independent corporate division. Since then, the publishing activities are part of the RTL Group division. Gruner + Jahr’s remaining activities are assigned to the Bertelsmann Investments division. This does not affect the reported figures in the GRI Report 2021.

GRI	Disclosure	UNGC
102-8	Information on employees and other workers	VI

Employees by division

	2021	2020
RTL Group	17,377	15,686
Penguin Random House	11,979	10,871
Gruner + Jahr	7,166	8,777
BMG	1,025	974
Arvato	96,824	85,662
Bertelsmann Printing Group	6,804	7,183
Bertelsmann Education Group	1,915	1,626
Bertelsmann Investments	396	390
Corporate	1,541	1,673
Total	145,027	132,842

Basis: employee headcount on permanent and temporary contracts, excluding trainees, as of December 31.

Employees by region

	2021	2020
Germany	40,318	40,378
Other European countries	47,514	44,391
North America	14,324	12,250
Central & South America	7,147	5,203
Africa	19,100	17,979
Asia	15,588	11,503
Australia & New Zealand	1,036	1,138
Total	145,027	132,842

Basis: employee headcount on permanent and temporary contracts, excluding trainees, as of December 31.

Employees by employment period

in percent

	2021	2020
Permanent	74	74
Temporary	26	26

Basis: employee headcount on permanent and temporary contracts, excluding trainees, as of December 31.
Rounding differences may occur.

Employees by employment period and region

in percent

	Permanent men	Permanent women	Permanent total	Temporary men	Temporary women	Temporary total
Germany	40.3	36.0	76.3	11.3	12.4	23.7

GRI	Disclosure						UNGC
	Other European countries	29.8	44.1	73.9	11.3	14.8	26.1
	North America	41.2	52.5	93.7	2.2	4.2	6.4
	Central & South America	16.5	27.9	44.4	23.4	32.3	55.7
	Africa	24.2	27.2	51.4	29.4	19.1	48.5
	Asia	44.9	52.7	97.6	1.1	1.3	2.4
	Australia & New Zealand	18.1	33.3	51.4	24.2	24.3	48.5
	Total	33.9	40.5	74.4	12.4	13.1	25.5

Basis: employee headcount on permanent and temporary contracts, excluding trainees, as of December 31.

Rounding differences may occur.

Full- and part-time employees in Germany

in percent

	2021	2020
Part-time	24	28
Full-time	76	72

Basis: employee headcount on permanent and temporary contracts, excluding trainees, as of December 31.

Information on external employees: see [GRI 401](#).

102-9 Supply chain

Bertelsmann has widely ramified supply chains with only a few main suppliers, including paper and energy suppliers. Most of the services purchased are creative in nature or other services rendered by humans. Bertelsmann is aware that its responsibility for human rights also goes beyond its own business operations. Respect for human rights within supply chains is explicitly stipulated by the Bertelsmann Code of Conduct and the Supplier Code of Conduct. This includes, e.g., the reaffirmation of the right to freedom of association and collective bargaining, the prohibition of child labor, and forced or compulsory labor.

More information on value creation: see [GRI 102-2](#).

More information on paper procurement: see [GRI 301](#).

More information on respect for human rights: see [GRI 407](#), [408](#), [409](#).

102-10 Significant changes to the organization and its supply chain

RTL Group

RTL Group saw various adjustments to its portfolio. In April 2021, RTL Group sold the interest held in its subsidiary SpotX to the U.S. ad-tech company Magnite. In July 2021, RTL Deutschland acquired the remaining 50 percent of the shares in Super RTL (RTL Disney Fernsehen GmbH & Co. KG). RTL Group's shareholding in Super RTL is now 100 percent. In August 2021, the takeover of Gruner + Jahr's German magazine businesses and brands by RTL Deutschland was announced. The transaction closed on January 1, 2022. As of the beginning of the 2022 financial year, Gruner + Jahr is no longer reported as an independent corporate division. Since then, the publishing activities are part of the RTL Group division. Gruner + Jahr's remaining activities are henceforth assigned to the Bertelsmann Investments division.

GRI**Disclosure****UNGC**

This does not affect the reported figures in the GRI Report 2021. In September 2021, Fremantle, RTL Group's production business, sold its stake in the mobile videogames company Ludia Inc. At the end of March 2022, the sale of RTL Belgium to the Belgian media companies DPG Media and Groupe Rossel was completed, and on June 1, 2022 the transaction to sell RTL Croatia to Central European Media Enterprises (CME) was closed. RTL Group also initiated further consolidation steps, which are still subject to approval by the relevant authorities. These include the announced mergers of Groupe TF1 and Groupe M6 in France and of RTL Nederland and Talpa Network in the Netherlands.

Gruner + Jahr

Effective May 31, 2021, Gruner + Jahr sold its interest held in its French subsidiary Prisma Media to the French media group Vivendi.

Bertelsmann Education Group

In early August 2021, Bertelsmann completed the acquisition of shares in the Brazilian education company Afya, thereby further expanding its global education business. In May 2022, Bertelsmann acquired a majority of the voting rights in Afya through an increase in its stake. The Nasdaq-listed education company has been fully consolidated since then and is assigned to the Bertelsmann Education Group division.

Arvato

In early September 2021, the global customer experience company Majorel announced its intention to enter the capital market through a private placement. The company's shares were traded on Euronext Amsterdam for the first time on September 24, 2021. Following the private placement of some of its shares, Bertelsmann holds almost 40 percent of Majorel shares. At the end of June 2022, Majorel and Sitel Group and their major shareholders, including Bertelsmann, reached an agreement on non-binding key terms for a proposed merger of the two companies. It is still subject to regulatory approvals. Following the proposed merger of Majorel and Sitel Group, Bertelsmann will hold a stake of around 17 percent in the combined company and will accordingly no longer fully consolidate Majorel.

Penguin Random House

Penguin Random House's acquisition of the book publisher Simon & Schuster from the media company Paramount Global (formerly ViacomCBS), which was announced in November 2020, is still pending approval by the antitrust authorities. On November 2, 2021, the Department of Justice filed a suit in the U.S. District Court in Washington D.C. to block the transaction, citing concerns about monopsony relating to the acquisition of author rights. Bertelsmann has assigned experienced trial lawyers and rejects the Department of Justice's grounds for prohibition as unfounded. No circumstances have occurred up to the end of the period covered by the half-year financial statements that would lead to a change in this assessment.

[Bertelsmann Annual Report 2021, pp. 11-12.](#)

102-11 Precautionary Principle or approach

As a global company, Bertelsmann is exposed to a large number of risks, including legal and regulatory risks. The purpose of the Bertelsmann risk management system (RMS) is the early identification, evaluation of, as well as response to, internal and external risks. The internal control system (ICS), an integral component of the RMS, monitors the effectiveness of the risk response measures that have been implemented. The aim of the

GRI	Disclosure	UNGC
	<p>RMS is to identify, at an early stage, material risks to the Group so that risk response measures can be taken and controls implemented. Risks are possible future developments or events that could result in a negative deviation from the outlook or objectives for Bertelsmann. In addition, risks can negatively affect the achievement of the Group's strategic, operational, reporting and compliance-related objectives, and its reputation.</p> <p>The risk management process is based on the internationally accepted frameworks of the Committee of Sponsoring Organizations of the Treadway Commission (COSO Enterprise Risk Management – Integrated Framework and Internal Control – Integrated Framework, respectively) and is organized in the subprocesses of identification, assessment, response, control, communication, and monitoring. A major element of risk identification is a risk inventory that lists significant risks year by year, from the profit-center level upward. These risks are aggregated step by step at the division and Group levels. This ensures that risks are registered at the point of their impact. The risks are compared to risk response and control measures to determine the net risk position. Both one- and three-year risk assessment horizons are applied to enable the timely implementation of risk response measures. Risk assessment is the product of the estimated negative impact on Group free cash flow should the risk occur and the estimated probability of occurrence. Risk monitoring is conducted by the Group management on an ongoing basis. The RMS, along with its component ICS, is constantly undergoing further development and is integrated into ongoing reporting to the Bertelsmann Executive Board and Supervisory Board. Corporate Risk Management Committee meetings are convened at regular intervals to ensure compliance with statutory and internal requirements.</p> <p>One of the ten principles of the United Nations (UN) Global Compact, which Bertelsmann has supported as a participant since 2008, is decisive action against corruption. By reporting in accordance with the GRI Standards, Bertelsmann also fulfills its obligation to state, in an annual Communication on Progress, what anti-corruption measures were taken.</p> <p>More information on Bertelsmann's precautionary approach: see GRI 102-15, 102-17, 205, 206.</p> <p>Bertelsmann Annual Report 2021, p. 32.</p>	
102-12	<p>External initiatives</p> <p>At the Group level, Bertelsmann supports the following external initiatives and their principles. In addition, Bertelsmann companies are involved in other external initiatives at the local level.</p> <ul style="list-style-type: none"> ▪ UN Global Compact: Bertelsmann has been a participant (signatory option) in the UN Global Compact since 2008. ▪ UN Sustainable Development Goals (SDGs): As a participant in the UN Global Compact, Bertelsmann supports the SDGs adopted by the United Nations in 2015. ▪ UN Guiding Principles on Business and Human Rights: Bertelsmann is committed to the Principles of the Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights of the United Nations. ▪ UN Standards of Conduct for Business on LGBTIQ+ (UN "Free & Equal"): Bertelsmann has been a supporter of the UN "Free & Equal" Standards since 2021. The standards are an initiative of the United Nations to protect the rights of the LGBTIQ+ community in the field of work. ▪ OECD Guidelines for Multinational Enterprises: Bertelsmann largely follows the OECD Guidelines for Multinational Enterprises. 	

GRI	Disclosure	UNGC
	<ul style="list-style-type: none"> ▪ International Labor Organization (ILO): Bertelsmann complies with the ILO Core Labor Standards. ▪ Global Reporting Initiative (GRI): Since 2011, Bertelsmann has based its Corporate Responsibility reporting on the currently valid international reporting framework issued by the GRI. The Group has reported in accordance with the GRI Standards since 2017 (core option). ▪ Committee of Sponsoring Organizations of the Treadway Commission (COSO): The risk management process is based on the internationally accepted COSO frameworks. ▪ German Corporate Governance Code ("Code"): The recommendations and suggestions contained in the Code, as amended on December 16, 2019, that entered into force on March 20, 2020, serve as guidelines for Bertelsmann. <p>In addition, Bertelsmann participates in relevant CR ratings and rankings, in which its management of non-financial matters is evaluated by third parties. In 2021, the company achieved Gold status in the EcoVadis CR rating, and scored a B ("Above Sector Average") in the CDP Climate Change rating.</p> <p><u>CR Ratings and Rankings</u></p>	
102-13	Membership of associations	
	<p><u>Memberships of Bertelsmann SE & Co. KGaA</u></p> <p>AGP – Arbeitsgemeinschaft zur Förderung der Partnerschaft in der Wirtschaft, Kassel Atlantik Brücke e. V., Berlin BDI – Bundesverband der Deutschen Industrie: Förderkreis der deutschen Industrie, Berlin BDI – Bundesverband der Deutschen Industrie: Kulturkreis der deutschen Wirtschaft, Berlin Charta der Vielfalt, Berlin Deutsch-Französische Industrie- und Handelskammer, Paris DGAP – Förderkreis Deutsche Gesellschaft für Auswärtige Politik e.V., Berlin ICC Germany e. V., Berlin econsense – Forum Nachhaltige Entwicklung der Deutschen Wirtschaft e. V., Berlin Fördergesellschaft FH Bielefeld e. V. Freunde und Förderer der Staatsoper Unter den Linden e. V., Berlin Freunde und Förderer der Stiftung Jüdisches Museum Berlin e. V. Gesellschaft der Freunde der Akademie der Künste e.V., Berlin GUG – Gesellschaft für Unternehmensgeschichte, Frankfurt a. M. Gesellschaft für Westfälische Wirtschaftsgeschichte e. V., Dortmund Gütersloher Verkehrsverein e. V. Humboldt Universitätsgesellschaft, Berlin PROUT AT WORK Foundation, Munich Responsible Media Forum, London Schmalenbach-Gesellschaft für Betriebswirtschaft e. V., Cologne Stifterverband für die Deutsche Wissenschaft, Essen Stiftung der Deutschen Wirtschaft, Berlin Stiftung Familienunternehmen, Munich Stiftung Lesen, Mainz Stiftung Preußischer Kulturbesitz, Kuratorium Museumsinsel, Berlin UN Global Compact, New York UnternehmensForum e. V., Ingelheim Verein der Freunde der Nationalgalerie, Berlin Westfälisch-Lippische Universitätsgesellschaft, Bielefeld</p>	

GRI	Disclosure	UNGC
	<p>WHU – Otto Beisheim School of Management / Stiftung WHU, Vallendar Wirtschaft und Wissenschaft für OWL e. V., Bielefeld Wirtschaftliche Gesellschaft für Westfalen und Lippe e. V., Münster Wirtschaftsinitiative Kreis Gütersloh e. V.: Pro Wirtschaft GT</p>	
102	Strategy	
102-14	<p>Statement from senior decision-maker</p> <p>See Chairman’s Foreword.</p>	
102-15	<p>Key impacts, risks, and opportunities</p> <p>A number of risks are associated with the CR priorities of Bertelsmann. These risks can arise from the company’s own business activities or from its business relationships and can affect the company or its surroundings and stakeholders.</p> <p>As defined in the German CSR Directive Implementation Act (“CSR-Richtlinie-Umsetzungsgesetz”) the major non-financial aspects where risks can occur are related to environmental, employee and social matters, respect for human rights, and the fight against corruption and bribery. For these non-financial aspects defined in the German Commercial Code (“Handelsgesetzbuch,” HGB), no material risks were identified during the 2021 reporting that are very likely to have a serious negative impact, either individually or aggregated (see Combined Non-Financial Statement in the Bertelsmann Annual Report 2021, pp. 44-52).</p> <p>In addition, there are also risks associated with the CR priorities of Bertelsmann that are linked to the company’s business activities, business relationships, and products and services, but that do not have any impacts that are very likely to be serious. The following risk assessment focuses on these CR risks.</p> <p>CR risks for Bertelsmann and its surroundings</p> <p><u>CR risks for Bertelsmann:</u> CR risks that may arise for Bertelsmann as a company include increasing business customer requirements, stemming from a range of non-financial topics, the nonfulfillment of which may result in revenue losses. CR topics are increasingly subject to statutory regulations, the noncompliance of which may lead to penalties and loss of trust in various stakeholder groups. Disruption in business processes, such as bottlenecks within supply chains for paper or energy procurement, can arise due to resource scarcity, exacerbated in particular in connection with the coronavirus pandemic. In human resources, risks may arise due to inadequate working conditions, with implications such as decreased employee motivation and productivity, inadequate skills due to a lack of training, increased illness, or staff turnover. Developments in media and socio-political changes, such as in the field of press freedom, also contain potential risks for Bertelsmann’s businesses.</p> <p><u>CR risks for Bertelsmann’s surroundings:</u> Bertelsmann’s business activities, including the supply chains, also have repercussions for the company’s surroundings, the environment, and its stakeholders. For example, working conditions have a direct and indirect impact on the well-being of employees, their individual opportunities, and their family environment. During the coronavirus pandemic, in particular, protecting the health of employees, e.g., by means of hygiene and protection concepts and flexible forms of work, such as work-from-home or mobile-office solutions, is of major importance. Bertelsmann’s business conduct also has a reciprocal relationship with the local communities they operate in and with global society. Corruption, for example, can impede economic development, contribute to the</p>	

GRI	Disclosure	UNGC
	<p>persistence of poverty, and limit equal opportunities. With regard to human rights, Bertelsmann’s journalistic conduct, its creative independence, and its treatment of data in particular affect the state of public information, freedom of opinion, self-determination, and democracy. In the field of environment, the use of resources such as paper influences the continuance, development, and diversity of ecosystems, and with them, sustainable living conditions. The company contributes to global warming through the direct and indirect emission of greenhouse gases.</p> <p>Finally, all risks caused by Bertelsmann – and the possible negative impacts on its surroundings – can also cause risks for the company, affecting factors such as reputation, attractiveness as an employer or business partner, litigation, and inclusion in “do not source” lists and indexes.</p> <p>For an overview of the CR topics relevant to Bertelsmann: see GRI 102-44, 102-47.</p>	

102 Ethics and Integrity

102-16 Values, principles, standards, and norms of behavior

I–X

The [Bertelsmann Essentials](#) describe the company’s sense of purpose, common objectives, and core values. The values of creativity and entrepreneurship are an integral part of everyday action at Bertelsmann. Through their interaction, they reinforce each other and thus form the cornerstones of Bertelsmann’s corporate culture, which relies on participation and partnership. The Bertelsmann Essentials are a prerequisite for a corporate culture in which employees, management, and shareholders work together in a successful, respectful, and trusting manner. In the spirit of the Essentials, Bertelsmann is mindful of the impact it has on employees, society, the business environment, and the natural environment and seeks to make a positive difference.

The revised [Bertelsmann Code of Conduct](#) communicated in 2021 is a globally binding guideline for all employees that defines standards for ethical and lawful conduct within the company and toward business partners and the public. Everyone in the company – employees, the Executive Board, and Supervisory Board – is obliged to adhere to the principles stipulated in it. The Code of Conduct is not only a guide to appropriate decision-making, but also provides information about the options for seeking advice in the company and for confidentially and securely expressing concerns about potential misconduct.

In addition, the [Bertelsmann Supplier Code of Conduct](#) obligates business partners that work for, with, or on behalf of Bertelsmann to adhere to minimum compliance and ethics standards set out in the Bertelsmann Code of Conduct. Bertelsmann also requires its business partners to pass these minimum requirements along their own supply chains to any third parties (e.g., subcontractors) they may use to fulfill their contractual obligations with Bertelsmann. In the event of violations of the Supplier Code of Conduct, Bertelsmann reserves the right to make appropriate responses corresponding to the severity of the violation, which may include contract termination.

102-17 Mechanisms for advice and concerns about ethics

At Bertelsmann, various options are continuously available to employees, business partners, and third parties for seeking advice or using confidential and secure speak-up channels to express concerns about potential misconduct. Contact points include the Integrity & Compliance department, a whistleblowing system at www.reportconcerns.com, which can be contacted online as well as by phone, and

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external ombudspersons appointed by Bertelsmann. All reports are investigated to ensure an adequate response to compliance violations.

More information on Compliance: see [GRI 205](#).

102 Governance

102-18 Governance structure

The pursuit of responsible corporate governance is part of the Bertelsmann identity and an important element of its corporate culture. Bertelsmann SE & Co. KGaA is a capital market-oriented but unlisted company. The corporate governance of Bertelsmann SE & Co. KGaA largely follows the recommendations and suggestions contained in the German Corporate Governance Code ("Code"). Due to Bertelsmann's specific shareholder structure, the company essentially deviates from recommendations and suggestions of the Code that are primarily aimed at publicly traded companies with a larger group of shareholders. Bertelsmann is not required to issue a declaration pursuant to Section 161 of the German Stock Corporation Act ("Aktengesetz," AktG), stating that it complies with the recommendations of the Code.

Statutory bodies of the company

The statutory bodies of Bertelsmann SE & Co. KGaA are the General Meeting, the Supervisory Board, and Bertelsmann Management SE as the general partner. Bertelsmann SE & Co. KGaA and Bertelsmann Management SE each have their own Supervisory Boards.

Tasks and decision-making processes

The Supervisory Board of Bertelsmann SE & Co. KGaA oversees the management of the business by the Bertelsmann Management SE and uses its extensive information and control rights for this purpose. In addition, the Supervisory Boards advise the Executive Board on strategic matters and significant transactions. The Executive and Supervisory Boards work in close, trusting cooperation, and are able to reconcile the demands of effective corporate governance with the need for rapid decision-making processes. The members of the Executive and Supervisory Boards are obliged to serve the company's best interests in their work. The Bertelsmann SE & Co. KGaA and Bertelsmann Management SE shareholders exercise their rights and vote at the respective General Meetings.

The Supervisory Board of Bertelsmann Management SE & Co. KGaA has formed an Audit and Finance Committee and a Working Group of Employee and Management Representatives. The tasks of the Supervisory Board of Bertelsmann Management SE complement the tasks of the Supervisory Board of Bertelsmann SE & Co. KGaA. In the former, a Personnel Committee and a Program Committee have been set up. The Audit and Finance Committee of the Supervisory Board of Bertelsmann SE & Co. KGaA addresses, among other things, the financial reporting and the financial reporting process and monitors the effectiveness of the risk management system, the internal control system, and the internal auditing system. Compliance within the Group and non-financial reporting are other important topics. One focus of the work is the review of the annual financial statements and consolidated financial statements.

[Bertelsmann Annual Report 2021, pp. 151-159.](#)

102-20 Executive-level responsibility for economic, environmental, and social topics

The advisory body responsible for the management and strategic development of Corporate Responsibility (CR) at Bertelsmann is the CR Council. The CR Council consists

GRI	Disclosure	UNGC
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of executives from the corporate divisions and the Chief Human Resources Officer of Bertelsmann, who chairs the advisory body.

It focuses on the further development of the Group-wide CR priorities in line with the corporate strategy, further anchoring of Corporate Responsibility in the corporate divisions, and the cross-divisional coordination of CR activities. At the Group level, the Corporate Responsibility department, a central staff function of the HR executive portfolio, coordinates and supports the work of the CR Council in close cooperation with other Group functions, such as Financial Reporting, Risk Management, Investor Relations, Human Resources and Employee Representations, Controlling & Strategy, Corporate Communications, Legal, and Integrity & Compliance. It is also responsible for Group-wide Corporate Responsibility reporting, the processing of ratings and rankings in this field, and coordinates the Group's stakeholder dialog as well as internal networks and consulting projects on a wide range of CR topics. Bertelsmann's environmental and climate management also falls within the scope of CR accountability, as does the Group-wide development of Diversity, Equity & inclusion and Health & Well-being.

Rooted in the company structure that has evolved at Bertelsmann over the decades, the principle of delegating responsibility applies for the implementation of Corporate Responsibility across the Group. Since Bertelsmann's local management teams know their businesses and the social and ecological environment they operate in best, specific CR measures and projects are locally implemented. The corporate divisions and companies have their own structures and processes in place for this, in accordance with local requirements.

Responsibilities at Executive Board level are also presented in the respective management approaches.

[CR Organization](#)

102-22 Composition of the highest governance body and its committees

In the 2021 financial year, women comprised 31 percent (previous year: 23 percent) of the Supervisory Board. The average age of Supervisory Board members was 60 (previous year: 59). 69 percent (previous year: 77 percent) of the Supervisory Board members were German, while 31 percent (previous year: 23 percent) were of international origin.

[Bertelsmann Annual Report 2021, pp. 160-163.](#)

102-23 Chair of the highest governance body

The respective duties and responsibilities of the General Meeting, the Supervisory Board, and Bertelsmann Management SE are clearly defined and are strictly separated from each other. Simultaneous membership in the Executive Board of Bertelsmann Management SE and the Supervisory Board of Bertelsmann Management SE & Co. KGaA is not permitted.

102 Stakeholder Engagement

102-40 List of stakeholder groups

Bertelsmann interacts with a variety of internal and external stakeholders: with potential employees, employee representatives, business partners, consumers, investors, bankers, journalists, creative talent, content producers, as well as policymakers and representatives of government agencies, associations, and non-governmental organizations.

GRI	Disclosure	UNGC
102-41	<p>Collective bargaining agreements</p> <p>The Code of Conduct and the Supplier Code of Conduct (see GRI 102-16) reaffirm the right to freedom of association and the right to engage in collective bargaining, in accordance with applicable laws and regulations, for all employees of Bertelsmann companies as well as those of business partners.</p>	III
102-42	<p>Identifying and selecting stakeholders</p> <p>On the one hand, Bertelsmann is in dialog with stakeholders who have a strong influence on the company's business, social or environmental performance, or on the regulatory framework that governs its activities. On the other hand, Bertelsmann seeks exchange with stakeholders who are significantly affected by its economic, social, or environmental contributions and impacts.</p>	
102-43	<p>Approach to stakeholder engagement</p> <p>In its day-to-day business, Bertelsmann is in close contact with journalists, investors, bankers, and customers through its press offices, Investor Relations department, and service centers. In addition to the daily press work and the events organized by Bertelsmann and its corporate divisions, which will continue to be primarily digital in 2021 given the coronavirus pandemic, the Annual Press Conference on year-end results, the communication accompanying the publication of the Interim Report, as well as quarterly figures represent proven formats for contact with journalists, investors, bankers, and the media. Because capital market financing is a major element in the Group's financing strategy, transparency vis-à-vis the capital market is of great importance for the company's financial security and independence.</p> <p>With the Combined Non-Financial Statement in the Bertelsmann Annual Report 2021 (pp. 44-52) matters related to Corporate Responsibility (CR) are reported in the Combined Management Report. As part of so-called CR relevance analyses, Bertelsmann regularly determines which CR topics should be primarily focused on. Inside the company, selected top executives and experts from the corporate divisions are surveyed; externally, the analysis covers, e.g., business partners, potential employees, investors, bankers, CR experts, journalists, and policymakers.</p> <p>For more information on Bertelsmann's stakeholders: see GRI 102-40.</p> <p>More information on the various dialog formats the company regularly carries out to promote exchange with employees and their representatives: see GRI 402.</p>	
102-44	<p>Key topics and concerns raised</p> <p>Based on the Corporate Responsibility (CR) relevance analysis, the Bertelsmann Executive Board adopted the following Group-wide eight CR priorities in January 2021:</p> <ul style="list-style-type: none"> ▪ Creative/Journalistic Independence & Freedom of Expression: Encouraging creative production and editorial decision-making, whilst upholding editorial guidelines and values without interference from media owners; journalistic independence without succumbing to any sort of political or economic influence. ▪ Content Responsibility: Creating and disseminating content that respects the rights and interests of the individuals involved, such as minors and other vulnerable groups. 	

GRI	Disclosure	UNGC
	<ul style="list-style-type: none"> ▪ Fair Working Conditions: Ensuring decent working conditions for employees, including job security, fair payment, health and safety at work, as well as social dialog and employee involvement. ▪ Diversity, Equity & Inclusion: Fostering a culture of mutual respect and belonging that values employees based on their diverse backgrounds, talents, and perspectives and enables everybody to realize their full potential. ▪ Health & Well-being: Providing a safe and healthy working environment and promoting physical, mental, and social well-being of all employees. ▪ Learning: Fostering learning and training to tackle major entrepreneurial challenges with well-trained employees; strengthening employees' innovative capacity. ▪ Responsibility in the Supply Chain: Acting responsibly along the supply chains in cooperation with suppliers and other business partners, e.g., use of materials and respect for human rights. ▪ Climate Change: Contributing to limit the global temperature rise to well below 2 degrees Celsius and adapting and taking measures to mitigate the negative impacts of climate change. <p>Non-financial topics, including their performance indicators, are increasingly important for Bertelsmann's businesses, but have not yet been incorporated into the Group's value-oriented management system.</p>	

[CR Relevance Matrix](#)

102 Reporting Practice

102-45 Entities included in the consolidated financial statements

All fully consolidated Group companies were included in this report. Deviations from the scope of consolidation are indicated in the text. The full list of shareholdings of the Bertelsmann Group according to Section § 313 (2) and § 285 No. 11 German Commercial Code ("Handelsgesetzbuch," HGB) for Bertelsmann SE & Co. KGaA as of December 31, 2021, can be found in the attachments of the individual financial statement of Bertelsmann SE & Co. KGaA, as of December 31, 2021.

[Individual Financial Statements and Combined Management Report 2021, pp. 28-49.](#)

102-46 Defining report content and topic boundaries

Bertelsmann regularly performs Corporate Responsibility (CR) relevance analyses to identify CR priorities. A total of 632 people took part in the most recent stakeholder survey; they were surveyed on 19 selected CR topics. External stakeholders assessed how Bertelsmann's business activities impact these CR topics, while internal stakeholders evaluated their relevance for the business. All external participants were surveyed by means of an anonymized online survey. The Corporate Responsibility department summarized the results in a [CR Relevance Matrix](#). The eight CR priorities identified in this way were adopted by the Bertelsmann Executive Board in January 2021. The Bertelsmann CR Program (2021–2023), adopted on this basis in November 2021, contains individual work programs for the priority CR topics. Their content and relevance for the 2021 financial year is explained elsewhere in this GRI Report.

Information on the eight CR priorities: see [GRI 102-44, 102-47](#).

Further information on this is available on the [Bertelsmann Website](#).

GRI

Disclosure

UNGC

102-47 List of material topics

Bertelsmann CR Topics for determination: see GRI 102-46	GRI Topics based on: GRI Standards 2016 and GRI Media Sector Disclosures, unless otherwise stated	Boundary/Scope cf. GRI Standards Glossary 2016, p.17
Creative/Journalistic Independence	Freedom of expression	Inside the company, outside the company
	Content production	Inside the company, outside the company
Content Responsibility	Marketing and labeling	Inside the company, outside the company
	Content dissemination	Inside the company
	Media literacy	Inside the company, outside the company
Fair Working Conditions	Employment	Inside the company
	Labor/management relations	Inside the company
	Freedom of association and collective bargaining	Inside the company, outside the company
Diversity, Equity & Inclusion	Diversity and equal opportunity	Inside the company
	Non-discrimination	Inside the company, outside the company
Health & Well-being	Occupational health and safety ¹⁾	Inside the company
Learning	Training and education	Inside the company
Responsibility in the Supply Chain	Materials	Outside the company
	Freedom of association and collective bargaining	Inside the company, outside the company
	Child labor	Outside the company
	Forced or compulsory labor	Outside the company
Climate Change	Emissions	Inside the company, outside the company
	Energy	Inside the company, outside the company
Compliance	Anti-competitive behavior	Inside the company
	Anti-corruption	Inside the company, outside the company
	Customer privacy	Inside the company
	Intellectual property	Inside the company
Other topics	Water and effluents ¹⁾	Inside the company, outside the company
	Waste ²⁾	Inside the company, outside the company
	Economic performance	Inside the company, outside the company
	Local communities	Inside the company
	Public policy	Inside the company

¹⁾ Basis: GRI Standards 2018; ²⁾ Basis: GRI Standards 2020.

GRI	Disclosure	UNGC
102-48	Restatements of information	
	If, in individual cases, a new presentation, calculation method, or optimized data collection leads to different results, this is noted in the respective places with a footnote.	
102-49	Changes in reporting	
	Due to the new eight CR priorities adopted by the Bertelsmann Executive Board in January 2021, there were changes in the list of material CR topics compared with previous years: see GRI 102-44 , 102-47 .	
102-50	Reporting period	
	The reporting period covers the 2021 financial year.	
102-51	Date of most recent report	
	The last Bertelsmann GRI Report was published in June 2021. In addition, CR information is continuously updated on the Bertelsmann Website .	
102-52	Reporting cycle	
	Annual.	
102-53	Contact point for questions regarding the report	
	Bertelsmann SE & Co. KGaA Corporate Responsibility Marie-Luise Kühn von Burgsdorff Senior Vice President Corporate Responsibility Phone: +49 (0) 5241-80-75021 esg@bertelsmann.com	
102-54	Claims of reporting in accordance with the GRI Standards	
	This report has been prepared in accordance with the GRI Standards: Core option.	
102-55	GRI content index	
	The GRI report includes the GRI content index (GRI 102 , GRI 200 , GRI 300 , GRI 400).	
102-56	External assurance	
	The economic indicators in this GRI report were taken from the Bertelsmann Annual Report 2021 , which was audited by KPMG AG. The audit was conducted with reasonable assurance and also covered the Combined Non-Financial Statement as part of the Bertelsmann Combined Management Report 2021, including figures on the proportion of women in top and senior management, the sites with green electricity, greenhouse gas (GHG) emissions (Scope 1 and 2 combined), as well as information on taxonomy-eligible revenues, capital expenditures (CapEx), and operating expenditures (OpEx) as defined by the EU Taxonomy.	
	Bertelsmann Annual Report 2021, pp. 143-150: Auditor's Report.	

GRI 200

Economic

GRI 200 Economic

GRI	Disclosure	UNGC
GRI 201	Economic Performance 2016	

103 Management approach 2016 (including GRI 103-1, 103-2, 103-3) I-X

The geographic core markets are Western Europe – in particular, Germany, France, the United Kingdom – and the United States. In addition, Bertelsmann is strengthening its involvement in growth markets such as Brazil, India, and China. Bertelsmann's strategic focus is on a fast-growing, digital, international, and diversified Group portfolio. Businesses in which Bertelsmann invests should have long-term stable growth, global reach, sustainable business models, high market-entry barriers, and scalability. At the beginning of 2021, Bertelsmann defined a Group-wide growth initiative and presented the new strategic growth priorities necessary for that: national media champions, global content, global services, online education, and investment portfolio. Further developing the strategy in this way is necessary to meet new challenges, such as growing competition from U.S. tech platforms. The Group aims to grow in both existing and new lines of business through organic initiatives and acquisitions. The following enablers form the basis for the successful implementation of the strategy: tech & data, upskilling, cooperation, and alliances. Substantial progress was made in the implementation of the new strategic priorities in the 2021 financial year.

[Bertelsmann Annual Report 2021, pp. 5-6.](#)

201-1 Direct economic value generated and distributed

Revenues by division

in € millions

	2021			2020		
	Germany	International	Total	Germany	International	Total
RTL Group	2,248	4,389	6,637	1,958	4,059	6,017
Penguin Random House	281	3,749	4,030	277	3,525	3,802
Gruener + Jahr	753	298	1,051	769	366	1,135
BMG	40	623	663	46	556	602
Arvato	1,851	3,184	5,035	1,666	2,716	4,382
Bertelsmann Printing Group	787	532	1,319	833	529	1,362
Bertelsmann Education Group	3	280	283	2	299	301
Bertelsmann Investments	2	6	8	4	8	12
Total divisional revenues	5,965	13,061	19,026	5,555	12,058	17,613
<i>Corporate/Consolidation</i>	<i>-245</i>	<i>-85</i>	<i>-330</i>	<i>-221</i>	<i>-103</i>	<i>-324</i>
Continuing operations	5,720	12,976	18,696	5,334	11,955	17,289

GRI

Disclosure

UNGC

Consolidated revenues by region

in percent

	2021	2020
Germany	30.6	30.9
France	11.0	11.9
United Kingdom	7.0	6.5
Other European countries	20.6	19.3
United States	23.3	24.8
Other countries	7.5	6.6

Consolidated revenues by category

in percent

	2021	2020
Rights and licenses	16.7	16.5
Own products and merchandise	23.5	25.3
Advertising	21.6	21.1
Services	38.2	37.1

[Bertelsmann Annual Report 2021, pp. 53-59.](#)

MSD
M1**Significant funding and other support received from nongovernmental sources (ads etc.)**

In the 2021 financial year, Bertelsmann generated 21.6 percent (previous year: 21.1 percent) of its revenues from advertising.

GRI
205

Anti-corruption 2016

103

Management approach 2016 (including GRI 103-1, 103-2, 103-3)

X

Corruption and bribery impede economic development, deter investors, and contribute to the persistence of poverty in many countries. For this reason, many states have tightened their anti-corruption laws in recent years. In the event of violation, executives and employees as well as the company itself may face considerable consequences under criminal and civil law, e.g., imprisonment, pecuniary fines, confiscation of profits, exclusion from tender procedures, and the revocation of permits. Business customers are also increasingly demanding evidence of effective anti-corruption compliance measures as a prerequisite for cooperation. Effective corruption prevention within the organization is therefore one of the key priorities for the Bertelsmann Executive Board. The objective is to reduce the risk of corruption to the greatest possible extent.

To avoid violations of laws and regulations as well as directives and company guidelines, the Bertelsmann Executive Board created a compliance organization. It appointed a Corporate Compliance Committee (CCC) and established an Integrity & Compliance program. The Integrity & Compliance department is subordinated to the CCC and advises and supports it. The department also handles the global further development of corruption prevention within the Group. The Head of the Integrity & Compliance department reports to the Head of the Corporate Legal Department, who also serves as Chair of the CCC.

GRI	Disclosure	UNGC
	<p>The latter, in turn, reports to the Chairman and Chief Executive Officer of Bertelsmann, who is responsible for matters of compliance within the Executive Board. This organization reflects the relevant standards for compliance management systems that contribute toward mitigating risks in various ways. Its basic elements include the Bertelsmann Code of Conduct, the Bertelsmann Supplier Code of Conduct (see GRI 102-16), the compliance guidelines, risk analysis, consultation, communication and training measures, whistleblowing systems, and case management.</p> <p>Bertelsmann complies with all applicable national and international anti-corruption regulations. Bribery and corruption as well as conduct that may harm the company’s assets or those of business partners or third parties are strictly prohibited. Both the Bertelsmann Code of Conduct and the Executive Board Guideline on Anti-corruption & Integrity explicitly prohibit all forms of corruption and bribery. The latter guideline specifies detailed principles and rules of conduct for complying with applicable regulations. Along with instructions for dealing with officials and guidelines for the granting or accepting of gifts in the context of business relations, it prescribes appropriate due diligence processes in dealing with third parties. It also describes the speak-up channels for reporting suspected violations and seeking advice as well as other prevention and control measures. The Executive Board Guideline for Dealing with Reports of Compliance Violations anchors an obligation to report suspected violations of the prohibition against corruption to the Bertelsmann Corporate Center. Another Executive Board Guideline regulates the compliance organization and the role of the compliance officers.</p> <p>The Bertelsmann Supplier Code of Conduct requires Bertelsmann business partners that work for, with, or on behalf of the company to comply with the same strict anti-corruption rules.</p> <p>The most important measures in 2021 included the publication of a new Code of Conduct. The findings of the Bertelsmann Compliance Risk Analysis 2021 show that the measures taken minimize the risk of corruption to the greatest extent possible.</p>	
205-2	<p>Communication and training about anti-corruption policies and procedures</p> <p>Local management has a duty to communicate the Code of Conduct and the Group Guidelines. Executives and employees covered by the nomination criteria are trained by means of an e-tutorial.</p> <p>Owing to the new Code of Conduct, the most important measures in 2021 included the design of a new Code of Conduct training, which is being rolled-out in 2022.</p>	X
GRI 206	Anti-competitive Behavior 2016	
103	<p>Management approach 2016 (including GRI 103-1, 103-2, 103-3)</p> <p>Bertelsmann is committed to the principle of fair competition and condemns antitrust violations and anti-competitive behavior. The objective is to reduce the risk of antitrust violations to the greatest possible extent. The company takes action against any known violation.</p> <p>The Executive Board-approved Group Guideline on Compliance with Antitrust Regulations anchors the obligation to report any antitrust violations. With regard to the supply chains, the Supplier Code of Conduct (see GRI 102-16) requires Bertelsmann’s business partners to comply with applicable antitrust and competition law.</p>	

GRI	Disclosure	UNGC
	<p>Violations of antitrust regulations can be reported at Bertelsmann by employees as well as by third parties through the speak-up channels of the existing compliance management system. The topic of antitrust and competition law is addressed in the annual Compliance Report submitted to the Executive Board. The Group's Legal department provides an obligatory antitrust training program to corporate divisions and their management and employees of these divisions who work in antitrust-related fields. This training program is designed to help identify antitrust risks at an early stage and to prevent antitrust violations. Since April 2020, it has been conducted virtually due to the coronavirus pandemic.</p>	
206-1	<p>Legal actions for anti-competitive behavior, anti-trust, and monopoly practices</p> <p>Further information on this is available in the Bertelsmann Annual Report 2021, p. 36-37.</p>	

GRI 300

Environmental

GRI 300 Environmental

Bertelsmann aspires to become climate neutral by 2030. With its long-term climate strategy “Bertelsmann Climate Neutral 2030,” the company fulfills its responsibility to reduce and offset greenhouse gas emissions. Bertelsmann has joined the Science Based Targets initiative (SBTi) and supports the target of the Paris Climate Agreement to limit global warming to well below 2 degrees Celsius.

Supplementing the climate strategy, the company defined further strategic objectives and developed measures from those, as part of the Bertelsmann CR Program (2021–2023). These objectives include strengthening the governance for climate and environmental protection and further developing environmental planning and reporting. In addition, the company intends to increase the share of renewable energies (green electricity, photovoltaics), implement new mobility concepts, advance energy efficiency, “Green IT,” and the measurement of the digital footprint. Emissions from the print and digital products supply chains are to be presented in a transparent manner and reduced successively in a joint effort with business partners.

The [Bertelsmann Environmental Policy](#), the [Bertelsmann Energy & Climate Policy](#), and the [Bertelsmann Paper Policy](#) provide the framework for the Group’s environmental management. In addition to climate neutrality (see [GRI 305](#)) and the shift to green electricity (see [GRI 302](#)), Bertelsmann strives to ensure the sustainable procurement of paper (see [GRI 301](#)).

Group-wide environmental efforts are coordinated by the Corporate Responsibility (CR) department under the supervision of the Chief Human Resources Officer (CHRO). Cross-divisional coordination is handled by the CR Council, which is chaired by the CHRO. Overall responsibility lies with the Bertelsmann Executive Board, which monitors the achievement of environmental targets annually as part of strategic planning. Operational responsibility for energy and environmental management lies with the managements of the individual Bertelsmann companies. The internationally staffed “be green” working group chaired by the Corporate Responsibility department serves as a platform for cross-divisional environmental engagement. Representatives from the Bertelsmann corporate divisions – e.g., paper buyers, energy and environmental managers, logistics experts, and controllers – regularly discuss current environmental topics and measures. The experts in the “be green” working group also coordinate the Group-wide collection and reporting of environmental data.

Since 2008, Bertelsmann has compiled Group-wide environmental indicators on paper, energy, water and effluents, greenhouse gas emissions, and waste (see [GRI 301](#), [302](#), [303](#), [305](#), [306](#)). These indicators illustrate the development of the environmental impacts of Bertelsmann and its sites, companies, and corporate divisions. Specific environmental footprint reports help them to evaluate opportunities and risks and to report to customers and business partners. They are also used in processing CR ratings. The basis for environmental reporting is the Group-wide IT platform “green.screen,” a platform for the collection, processing, and analysis of environmental data at all levels of the organization. At the same time, more and more Bertelsmann companies are using “green.screen” for their digital energy data management. All production and logistics sites, the company’s own computer centers, and most of its own and rented office sites were included in the latest data collection process. The environmental data for employees at the remaining office locations was calculated based on average consumption values.

In addition, Bertelsmann and its corporate divisions run an international “be green Day” campaign every two years to mobilize employees for environmental and climate protection. In 2021, employees from 120 Bertelsmann sites in 20 countries took part in the campaign under the title “Act green, live healthy: Climate neutrality 2030 - only with you” and uploaded individual contributions for more sustainability to the “be green Day” world map. The contributions focused primarily on the topics of nutrition and mobility.

GRI

Disclosure

UNGC

GRI
301

Materials 2016

103

Management approach 2016 (including GRI 103-1, 103-2, 103-3)

VII–VIII

Bertelsmann uses a wide variety of materials in the production and logistics of physical products. Besides paper and cardboard, these include, e.g., printing inks, coatings and adhesives, granulate for the production of CDs and DVDs, and plastic-based films and packaging. In addition, materials are procured as part of purchased goods and services.

Paper continues to be of particular relevance to Bertelsmann, representing the most important resource for the company's traditional print media business. Even in an increasingly digitized media landscape, printed books, magazines, brochures, and flyers continue to have their place. Therefore, sustainable forestry, resource conservation, climate protection, and waste avoidance play a major role for Bertelsmann across the entire paper value chain. To protect forests that are valuable for climate and biodiversity, Bertelsmann has issued a [Paper Policy](#) for paper procurement to complement its [Environmental Policy](#). It stipulates, e.g., that no wood from primary or protected forests can be used in paper production. Bertelsmann companies also need to ensure that the paper used has the highest possible proportion of recycled materials in addition to certified wood fibers.

Bertelsmann strives to raise the share of recycled paper and paper from certified, sustainable forestry to 100 percent. Recycled paper as well as paper of certified origin, complying with FSC®, PEFC™, SFI® requirements or comparable standards, are regarded as sustainably sourced paper.

Bertelsmann's media businesses have stepped up their efforts to produce content and products in a resource-conserving manner, e.g., with certified sustainable books and magazines, "green" TV productions, and plastic-free packaging. In their function as providers of print services, Bertelsmann companies in the service business offer their customers an extensive range of sustainably certified and climate-neutral print products.

Information on the general management approach for environmental matters: see [GRI 300](#).

301-1

Materials used by weight or volume

VII–VIII

Material consumption

in tons

	2021	2020
Paper ¹⁾	1,438,350	1,481,180
Other materials	73,750	60,090
Total materials	1,512,100	1,541,270

¹⁾ Including quantities procured via service providers and provided by third parties

In the 2021 financial year, Bertelsmann's total material use decreased slightly by 2 percent. The amount of paper used for print products, packaging paper, and office paper diminished by 3 percent, primarily due to the decline in the print business of the Bertelsmann Printing Group and Gruner + Jahr. In contrast, the use of other materials increased by 23 percent year on year, in particular due to Arvato's growing logistics business.

GRI

Disclosure

UNGC

Paper consumption by division

in tons

	2021	2020
RTL Group	66	88
Penguin Random House	298,280	258,518
Gruner + Jahr	38,684	64,278
BMG	1	3
Arvato	40,241	21,979
Bertelsmann Printing Group	1,139,503	1,239,877
Bertelsmann Education Group	2	6
Bertelsmann Investments	1	1
Corporate	52	9
Total paper before consolidation	1,516,830	1,584,759
<i>Consolidated</i>	<i>-78,480</i>	<i>-103,541</i>
Total paper after consolidation	1,438,350	1,481,218

The year-on-year development of paper quantities used varied from division to division. Bertelsmann Printing Group and Gruner + Jahr recorded declines in paper quantities of about 126,000 tons, primarily due to reduced sales of print products. In contrast, paper consumption at Penguin Random House increased by about 40,000 tons due to higher book sales. In Arvato's logistics business, growth in online shipping in particular led to an increase in packaging paper of about 18,000 tons.

301-2

Recycled input materials used

VIII

Paper consumption and share of recycled and certified paper by division

in tons

	Total paper	of which recycled	of which certified	of which other
RTL Group	66	17	34	15
Penguin Random House	298,280	3,377	283,167	11,736
Gruner + Jahr	38,684	13,857	24,784	43
BMG	1	0	0	1
Arvato	40,241	17,413	4,948	17,880
Bertelsmann Printing Group	1,139,503	203,598	642,689	293,216
Bertelsmann Education Group	2	1	0	1
Bertelsmann Investments	1	0	0	1
Corporate	52	38	0	14
Total paper before consolidation	1,516,830	238,301	955,622	322,907
<i>Consolidated</i>	<i>-78,480</i>	<i>-127</i>	<i>-77,861</i>	<i>-492</i>
Total paper after consolidation	1,438,350	238,174	877,761	322,415

GRI Disclosure UNGC

In the 2021 financial year, 78 percent of the total paper quantities used was either recycled paper or certified fresh-fiber paper. Paper that meets the requirements of FSC®, PEFC™, SFI®, or similar standards is shown under “certified quantities.” The remaining 22 percent of the total quantities of paper procured did not meet the above criteria and is reported as “other”; the majority of this was supplied by customers outside the Group for the printing of books, magazines, catalogs, and brochures (“provisions”).

Share of sustainably sourced paper

in percent

	2021	2020
Share of recycled fibers	24	25
Share of certified fresh fibers	71	72
Total share	95	97

For quantities of paper purchased by Bertelsmann companies on their own account and not provided by third parties, Bertelsmann has set the target of sourcing 100 percent according to the paper standards described above. Bertelsmann uses the shares of recycled paper and certified fresh fiber paper in the total quantity of paper purchased as indicators of responsible use of natural resources and protection of forests. The share of sustainably sourced paper for own account decreased slightly from 97 to 95 percent in the 2021 financial year. This decrease is mainly attributable to Penguin Random House, where non-certified paper had to be increasingly purchased due to a difficult procurement market.

GRI 302 Energy 2016

103 Management approach 2016 (including GRI 103-1, 103-2, 103-3) VII-IX

Energy, as a major factor influencing the “Bertelsmann Climate Neutral 2030” climate strategy, is a focus topic for the Group. Although increasing digitalization lowers the company’s dependency on finite natural resources, it simultaneously leads to a higher energy consumption caused by data use. Besides improving its energy efficiency, Bertelsmann relies on increasing the use of renewable energies across all corporate divisions and among its external IT service providers. The Group-wide specifications on energy management are codified in the [Bertelsmann Energy & Climate Policy](#).

As the most important lever for reducing its own emissions, Bertelsmann pursues the target of procuring 100 percent of the electricity purchased from renewable sources. Alongside electricity purchasing, local on-site generation of own electricity and heat using renewable energies still makes up only a small share, but is to be expanded and contribute to the transformation of local energy markets. Bertelsmann does not use lignite or anthracite in own energy generation and expects its energy suppliers to gradually phase out fossil fuels. Increasing transparency about energy consumption thanks to the “green.screen” IT platform supports energy data management at site level and enables cross-site exchange. At this point, energy data collected during the year at more than 100 national and international sites is compiled and visualized in “green.screen.”

Information on the general management approach for environmental matters: see [GRI 300](#).

GRI	Disclosure	UNGC
302-1	Energy consumption within the organization	VII–VIII

Use of fuels and propellants

in megawatt hours (MWh)

	2021	2020
Natural gas	954,000	1,064,000
Diesel	33,500	34,000
Gasoline	10,000	9,000
Heating oil	7,100	7,000
Other	10,600	8,600

In the 2021 financial year, a total of 954,000 MWh of natural gas were used for the company's own energy generation, reflecting a year-on-year decrease of 10 percent. Natural gas is used in combined heat and power plants to produce electricity and heat to generate process heat in printing plants and in heating systems for the company's own heat generation. Only a small proportion of heat is generated using heating oil. The volume used remained nearly the same compared to the previous year. In the 2021 financial year, 33,500 MWh of diesel were consumed, equivalent to a 1-percent decrease compared to the previous year. 95 percent of the diesel was used for company cars, with the remainder used for emergency generators and forklifts. Gasoline consumption by company cars increased by 11 percent. The remaining energy quantities subsumed under "other" comprise fuels for fleet vehicles, company jets, and renewable fuels. Here, a 23-percent increase occurred, primarily due to an increased use of company jets. In accordance with the Bertelsmann Energy & Climate Policy, no coal is used in the in-house generation of energy.

In addition to energy generation from fossil fuels and propellants, Bertelsmann also generates a small amount of energy from renewable sources. Electricity generation from solar power increased from 8,000 MWh in 2020 to 10,800 MWh in 2021. About one-third of this was consumed by the company itself and the remaining amount was fed into the power grid. The increase was achieved primarily through higher solar power generation at Arvato Supply Chain Solutions in the Netherlands.

Procurement of electricity and heat

in megawatt hours (MWh)

	2021	2020
Purchased electricity	477,100	475,300
<i>of which from renewable sources</i>	<i>211,600</i>	<i>106,900</i>
Purchased heat	103,200	117,400
<i>of which from renewable sources</i>	<i>4,700</i>	<i>3,700</i>
Total purchased energy	580,300	592,700

In addition to the fuels and propellants used, Bertelsmann records the procurement of electricity and heat. Besides grid purchases, this also includes energy volumes at rented properties that are provided by landlords. Purchased energy decreased by 2 percent in the 2021 financial year, while Bertelsmann was able to significantly increase its consumption of

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renewable energies with certificates of origin. The share of green electricity in total purchased electricity doubled to 44 percent (previous year: 22 percent). In the 2021 financial year, the number of sites using green electricity increased from 81 to 181 sites compared to the previous year. These mainly included sites in Germany, including RTL Deutschland's headquarters in Cologne and almost all of Arvato's German sites.

Energy consumption by division

in megawatt hours (MWh)

	2021 ¹⁾	2020 ¹⁾
RTL Group	115,200	123,600
Penguin Random House	89,300	79,800
Gruner + Jahr	29,500	30,500
BMG	2,100	2,200
Arvato	321,500	330,500
Bertelsmann Printing Group	1,020,600	1,131,900
Bertelsmann Education Group	4,000	4,900
Bertelsmann Investments	200	300
Corporate	17,000	15,100
Total energy consumption	1,599,400	1,718,800

¹⁾ The total energy consumption of the corporate divisions will be presented, for the first time in the 2021 financial year and also retrospectively for 2020, as the sum of the use of fuels and propellants, the consumption of self-generated energy, and the energy volumes purchased.

Total energy consumption includes the fuels and propellants used, self-generated energy, and energy volumes purchased. In the 2021 financial year, Bertelsmann Printing Group accounted for by far the largest share of total consumption at 64 percent, followed by Arvato at about 20 percent, and RTL Group at 7 percent. The remaining 9 percent was distributed among the other corporate divisions. Total energy consumption decreased by 7 percent compared to the previous year. Due to production declines at Bertelsmann Printing Group, consumption fell by about 110,000 MWh despite two new printing sites in the United States. The decreases at RTL Group and Arvato are attributable to portfolio adjustments, such as the sale of SpotX and cost-saving measures. In contrast, there was an increase at Penguin Random House due to two new logistics halls as well as the increased return to offices following the lifting of coronavirus measures in the United States.

302-2

Energy consumption outside of the organization

VII-VIII

Mobility

in millions of kilometers

	2021	2020
Employee commutes	502	571
Business travel	46	72
Total mobility	548	643

The mobility of employees continued to decrease in the 2021 financial year, particularly due to the effects of the coronavirus pandemic.

GRI	Disclosure	UNGC															
	<p>The number of kilometers traveled by employees commuting to work and on business trips fell by 15 percent compared to the previous year. At 92 percent, employee commutes to their place of work accounted for the largest share of distance traveled. Increased working from home throughout the year reduced this share by 12 percent. Likewise, the number of kilometers traveled on business trips fell by 36 percent. The reason for this, besides the restrictions on travel due to the coronavirus pandemic, was the increased use of digital communication tools.</p>																
302-3	<p>Energy intensity</p> <p>The energy intensity, the ratio of the sum of the recorded total energy consumption values in megawatt hours to the total revenues reported in the consolidated financial statements (in millions of euros), was at 86¹⁾ in the 2021 financial year. Compared to the previous year (99)¹⁾, this represents a further decline by 13 percent.</p> <p>¹⁾ The total energy consumption of the corporate divisions will be presented, for the first time in the 2021 financial year and also retrospectively for 2020, as the sum of the use of fuels and propellants, the consumption of self-generated energy, and the energy volumes purchased.</p>	VIII															
302-4	<p>Reduction of energy consumption</p> <p>See GRI 302-1.</p>	VII-IX															
GRI 303	Water and Effluents 2018																
103	<p>Management approach 2016 (including GRI 103-1, 103-2, 103-3)</p> <p>Data on water consumption and effluents are also recorded Group-wide as part of the annual environmental data survey, using the “green.screen” IT platform. Based on this data, trends can be discerned and potential for improvement identified. Regarding the regulation of water management, these topics are predominantly handled by the local businesses.</p> <p>Information on the general management approach for environmental matters: see GRI 300.</p>	VII-VIII															
303-1	<p>Interactions with water as a shared resource</p> <p>See GRI 303 Management approach.</p>	VII-VIII															
303-2	<p>Management of water discharge-related impacts</p> <p>See GRI 303 Management approach.</p>	VII-VIII															
303-3	<p>Water withdrawal</p> <p>Water withdrawal by source in thousands of cubic meters</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">2021</th> <th style="text-align: center;">2020</th> </tr> </thead> <tbody> <tr> <td>from public utilities</td> <td style="text-align: center;">1,092</td> <td style="text-align: center;">1,066</td> </tr> <tr> <td>from groundwater</td> <td style="text-align: center;">2,694</td> <td style="text-align: center;">2,813</td> </tr> <tr> <td>from rainwater storage tanks</td> <td style="text-align: center;">4</td> <td style="text-align: center;">12</td> </tr> <tr> <td>Total water withdrawal</td> <td style="text-align: center;">3,790</td> <td style="text-align: center;">3,891</td> </tr> </tbody> </table>		2021	2020	from public utilities	1,092	1,066	from groundwater	2,694	2,813	from rainwater storage tanks	4	12	Total water withdrawal	3,790	3,891	VII-VIII
	2021	2020															
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Total water withdrawal	3,790	3,891															

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In the 2021 financial year, total water withdrawal decreased by 3 percent compared to the previous year. At the same time, water withdrawals from public utilities increased by 2 percent. This can be attributed, among other things, to two new Bertelsmann Printing Group sites in the United States and the international expansion of Arvato Supply Chain Solutions' logistics business. In contrast, the use of groundwater from wells decreased by 4 percent. The reduction is due to lower use of cooling water for the RTL Deutschland site in Cologne and the closure of a Bertelsmann Printing Group plant in Nuremberg.

Water withdrawal by division

in thousands of cubic meters

	2021	2020
RTL Group	2,113	2,167
Penguin Random House	84	93
Gruener + Jahr	28	42
BMG	7	4
Arvato	584	457
Bertelsmann Printing Group	939	1,024
Bertelsmann Education Group	8	79
Bertelsmann Investments	1	0
Corporate	26	25
Total water withdrawal	3,790	3,891

Water is used to varying degrees in the individual corporate divisions. In the 2021 financial year, RTL Group accounted for more than half of the water withdrawals at just under 56 percent, predominantly required for energy-saving cooling of buildings from well systems. Bertelsmann Printing Group accounted for another 25 percent and Arvato for 15 percent. The other corporate divisions accounted for 4 percent of total water withdrawal.

303-4

Water discharge

VII–VIII

Water discharge by destination

in thousands of cubic meters

	2021	2020
into public sewage systems or to third parties	1,199	1,105
into surface water, receiving waters, or own wastewater treatment plants	2,066	2,129
Total water discharge	3,265	3,234

In the 2021 financial year, water discharge remained at about the same level as in the previous year. Discharge into surface water, receiving waters, or own wastewater treatment plants decreased by 3 percent, derived from the above-mentioned decrease in well water withdrawal.

GRI	Disclosure	UNGC
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By contrast, water discharged into the public sewerage system or to third parties increased by 8 percent, primarily due to the new printing and logistics sites mentioned above.

**GRI
305**

Emissions 2016

103 Management approach 2016 (including GRI 103-1, 103-2, 103-3)

VII–IX

Bertelsmann supports the international community's target of limiting global warming to well below 2 degrees Celsius in line with the Paris Climate Agreement. Bertelsmann aspires to become climate neutral by 2030. The greenhouse gas emissions generated at its own sites, employee business travel, and the manufacture of its own products are to be reduced significantly by 2030 and the remaining emissions offset. The total emissions from the above causes amounted to 1.1 million tons of CO₂ equivalents (CO₂e) in the 2021 financial year. This represents a 15-percent reduction compared to the 2018 baseline (1.3 million tons of CO₂e). The Group-wide target of cutting greenhouse gas emissions by 50 percent compared to 2018 includes besides emissions from sites, employees, and own products, also all other emissions covered in the carbon footprint. This reduction target was validated by the Science Based Targets initiative (SBTi).

The "Bertelsmann Climate Neutral 2030" climate strategy prioritizes measures to avoid and reduce emissions – ahead of offsetting remaining emissions. In 2021, individual targets were established for media and service divisions as well as for the education division on this basis and relevant measures were identified. The achievement of these division-specific targets is discussed as part of annual strategy meetings between Executive Board members and divisional heads, based on uniform Group-wide milestones and indicators. In addition, the company defined further strategic objectives and developed measures from those, as part of the Bertelsmann CR Program (2021–2023).

Unavoidable emissions are offset via a voluntary climate-protection project. Further projects are to be added in the years ahead and together form a project portfolio. Projects are carefully selected on the basis of defined criteria. For example, the projects must have a long-term orientation and ensure as best as possible that compensated CO₂ emissions are not returned to the atmosphere. In the 2021 financial year, certificates for more than 22,500 tons were offset by a reforestation project in Brazil that is exclusively supported by Bertelsmann.

Greenhouse gas emissions are accounted for in accordance with the Corporate Accounting and Reporting Standard, the Scope 2 Guidance, and in line with the Corporate Value Chain (Scope 3) Standard of the Greenhouse Gas Protocol (GHG Protocol). Greenhouse gas emissions are reported in CO₂ equivalents (CO₂e). In accordance with the GHG Protocol, emissions are reported in three different categories: Scope 1 refers to Bertelsmann's direct emissions, which e.g., result from its own on-site power generation and the operation of printing plants. Scope 2 covers indirect emissions from the generation of purchased electricity and district heating or heat provided by landlords. In accordance with the Scope 2 Guidance of the GHG Protocol, Bertelsmann reports both market-based and site-based emissions in the overview of key indicators. In addition, all relevant indirect emissions (Scope 3) from the value chain are accounted for. In accordance with the Corporate Value Chain (Scope 3) Standard, this includes upstream emission sources such as the purchase and transport of materials and the mobility of employees as well as downstream steps such as the distribution of products.

Information on the general management approach for environmental matters: see [GRI 300](#).

GRI	Disclosure	UNGC
305-1	Direct (Scope 1) GHG emissions	VII–VIII

Scope 1 and 2 emissions

in tons of CO₂ equivalents (CO₂e)

	2021	2020
Scope 1 emissions	215,800	237,100 ¹⁾
Scope 2 emissions ²⁾	124,400	148,400
Scope 1 and 2 total	340,200	385,500

¹⁾ Prior-year figures adjusted

²⁾ Scope 2 emissions were calculated using the market-based method as indicated in the Scope 2 Guidance of the GHG Protocol. According to the site-based method, Scope 2 emissions amounted to 191,200 tons of CO₂e (previous year: 200,600 tons).

The sum of direct (Scope 1) and energy-related indirect (Scope 2) greenhouse gas emissions in the 2021 financial year amounted to 340,200 tons of CO₂e, a decrease of 12 percent compared to the previous year (385,500 tons of CO₂e). Scope 1 emissions at Bertelsmann stem primarily from the combustion of fossil fuels such as natural gas. These emissions fell by 9 percent in the 2021 financial year, in particular due to declines in business at Bertelsmann Printing Group. Scope 2 emissions from the purchase of electricity and heat were reduced by 16 percent. The shift to green electricity alone, particularly at sites in Germany, saved about 40,000 tons of CO₂e.

Scope 1 and 2 emissions by division

in tons of CO₂ equivalents (CO₂e)

	2021	2020 ¹⁾
RTL Group	12,500	21,600
Penguin Random House	14,200	11,400
Gruner + Jahr	6,200	5,700
BMG	600	700
Arvato	70,600	87,500
Bertelsmann Printing Group	230,400	253,100
Bertelsmann Education Group	2,000	1,900
Bertelsmann Investments	100	100
Corporate	3,600	3,500
Scope 1 and 2 total	340,200	385,500

¹⁾ Prior-year figures adjusted

Bertelsmann Printing Group and Arvato accounted for the largest share of Bertelsmann's Scope 1 and Scope 2 emissions in the 2021 financial year. This can be attributed to the consumption of electricity, natural gas, and heat by the printing plants at Bertelsmann Printing Group and the operation of Arvato Supply Chain Solutions' logistics sites.

The year-on-year development of Scope 1 and Scope 2 emissions varied across the corporate divisions. Bertelsmann Printing Group, RTL Group, and Arvato saw a decrease in emissions. Meanwhile, emissions increased at Gruner + Jahr and Penguin Random House. The other corporate divisions remained roughly at the previous year's level. At Bertelsmann Printing Group, 22,700 tons less CO₂e were emitted than in the previous

GRI	Disclosure	UNGC
	year, due in part to declines in production. This was countered by increases in emissions, e.g., due to new logistics halls at Penguin Random House.	
305-2	Energy indirect (Scope 2) GHG emissions See GRI 305-1 .	VII–VIII
305-3	Other indirect (Scope 3) GHG emissions	VII–VIII

Scope 3 emissions

in tons of CO₂ equivalents (CO₂e)

	2021	2020
Materials and services	1,301,800	1,240,000
Energy-related emissions	70,100	55,000
Upstream transports	162,100	159,300
Business travel	12,900	18,500
Commuting by employees	55,000	76,800
Downstream transports	219,000	210,400
Other	23,800	27,400
Scope 3 total before consolidation	1,844,700	1,787,400
<i>Consolidated</i>	<i>-71,200</i>	<i>-145,700</i>
Scope 3 total after consolidation	1,773,500	1,641,700

Within the Scope 3 categories, indirect greenhouse gas emissions from materials and services accounted for the largest share in the 2021 financial year at 71 percent (before consolidation). This included, among other things, emissions from paper procurement, printing materials used, external services, and the production of TV content.

Downstream transports from the distribution of products accounted for just under 12 percent of Scope 3 emissions, while upstream transports accounted for 9 percent. Other sources include upstream energy-related emissions (outside Scope 1 and Scope 2), such as commuting by employees, business travel, and emissions from waste logistics and the end-of-life cycle of Bertelsmann's own products.

Scope 3 emissions (after consolidation) increased by 8 percent in the 2021 financial year. There were increases in emissions, primarily along the value chain for the company's own products such as books and sound recordings. For this reason, emissions from purchased materials and transport rose by a total of 73,000 tons of CO₂e compared to the previous year. In contrast, mobility-related Scope 3 emissions decreased by 28,000 tons of CO₂e due to the coronavirus pandemic and the associated restrictions, increased working from home, and the use of digital communication tools. Also, fewer emissions were consolidated in the 2021 financial year. On the one hand, this was due to the sale of Prisma Media, as a significant proportion of its printing services were carried out at Bertelsmann companies. On the other hand, improved data transparency in paper deliveries led to a more precise allocation of emissions to individual corporate divisions. This resulted in lower volumes of emissions to be consolidated.

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Scope 3 emissions by divisionin tons of CO₂ equivalents (CO₂e)

	2021	2020
RTL Group	137,600	138,200
Penguin Random House	572,700	483,200
Gruner + Jahr	51,200	80,400
BMG	8,600	7,000
Arvato	224,500	184,100
Bertelsmann Printing Group	847,000	889,400
Bertelsmann Education Group	1,100	2,400
Bertelsmann Investments	100	300
Corporate	1,900	2,400
Scope 3 total before consolidation	1,844,700	1,787,400
<i>Consolidated</i>	<i>-71,200</i>	<i>-145,700</i>
Scope 3 total after consolidation	1,773,500	1,641,700

In the 2021 financial year, Bertelsmann Printing Group accounted for the largest share of Scope 3 emissions at 46 percent (before consolidation), followed by Penguin Random House at 31 percent, and Arvato at 12 percent. The other corporate divisions accounted for the remaining 11 percent.

Overview of total GHG emissionsin tons of CO₂ equivalents (CO₂e)

	2021	2020
Scope 1 emissions	215,800	237,100 ¹⁾
Scope 2 emissions	124,400	148,400
Scope 3 emissions	1,773,500	1,641,700
Scope 1, 2 and 3 total	2,113,700	2,027,200

¹⁾ Prior-year figures adjusted

In the 2021 financial year, the total direct and indirect greenhouse gas emissions (Scope 1, 2 and 3) accounted for was 2.11 million tons of CO₂e, of which 84 percent stemmed from indirect emissions along the value chain (Scope 3).

305-4**GHG emissions intensity****VIII**

Specific greenhouse gas emissions (Scope 1 and Scope 2) fell from 22.3¹⁾ tons of CO₂e per 1 million euros of Group revenue in the 2020 financial year to 18.2 tons of CO₂e per 1 million euros of Group revenue in the 2021 financial year.

¹⁾ Prior-year figures adjusted

305-5**Reduction of GHG emissions****VII–VIII****Change in GHG Emissions compared to the base year**

GRI	Disclosure	UNGC
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Bertelsmann aims to cut its recorded greenhouse gas emissions by 50 percent compared to the 2018 baseline by 2030 (see **GRI 305 Management approach**). In the 2018 baseline, a small proportion of the total 2.5 million tons of CO₂e (19 percent) was generated at Bertelsmann’s own sites (Scope 1 and Scope 2) and, accordingly, the largest proportion of 81 percent was generated along the value chain (Scope 3). One major source of Scope 1 and Scope 2 emissions is the combustion of natural gas/the purchase of electricity at Bertelsmann’s own sites. The majority of Scope 3 emissions are attributable to the value chain of print products.

Since the 2018 baseline, total emissions have already been reduced by 15 percent to 2.1 million tons of CO₂e despite rising revenues. The shift to green electricity at the company’s own sites, particularly at Penguin Random House, RTL Group, and Arvato, led to a saving of about 80,000 tons of CO₂e. Restrictions in mobility due to the coronavirus pandemic resulted in savings of about 130,000 tons of CO₂e across all corporate divisions through increased working from home and significantly reduced business travel. Much of the savings is attributable to production declines in the print business, which caused emissions at Bertelsmann Printing Group and Gruner + Jahr to fall by 270,000 tons of CO₂e. In addition, further reductions were realized through increased energy efficiency at the company’s own sites and through reduced emissions in content production. Meanwhile, increases were observed in the growth businesses of Penguin Random House and Arvato Supply Chain Solutions (Scope 3 in particular). These resulted in an increase of about 140,000 tons of CO₂e since the 2018 baseline. An increase in emissions was also observed at suppliers in the upstream value chain of physical products.

See **GRI 305-1, 305-3**.

GRI 306	Waste 2020
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103	Management approach 2016 (including GRI 103-1, 103-2, 103-3)	VIII
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The material quantities of waste at Bertelsmann are generated in the printing services and logistics business and consist largely of the raw material paper. This primarily includes paper waste from the printing process, or waste paper from books and magazines, as well as packaging paper in the logistics. Further waste from synthetic raw materials, such as metals and chemicals, is generated in the printing and production processes. In the logistics, waste is also generated from transport materials made of wood and plastic. In addition, small quantities of waste are generated at the office sites.

In addition to the waste generated at the company’s own sites, waste is also generated at the end of the lifecycle of its own products. This is mainly waste from the raw material paper, which to a high degree is recyclable and, depending on the local disposal infrastructure, is in fact largely recycled.

Data on waste generation is also recorded Group-wide as part of the annual environmental data survey, using the IT platform “green.screen.” Based on this data, trends can be discerned and potential for improvement identified. Bertelsmann’s businesses strive to maximize the recycling of materials. Waste is generally recycled and disposed by private or municipal disposal companies outside the sites. Disposal is handled very differently from region to region and is the operational responsibility of the local management of Bertelsmann companies. At some sites, such as Corporate and Arvato Systems, discarded IT equipment is collected and given to a social services provider for reprocessing.

GRI	Disclosure	UNGC
	Information on the general management approach for environmental matters: see GRI 300 .	
306-1	Waste generation and significant waste-related impacts See GRI 306 Management approach .	VIII
306-2	Management of significant waste-related impacts See GRI 306 Management approach .	VIII
306-3	Waste generated	VIII

Waste by type of disposal

in tons

	2021	2020
for recycling	243,700	247,400
for energy recovery ¹⁾	4,500	-
for incineration ¹⁾	1,100	-
for landfill and other	9,400	11,500
<i>of which classified as hazardous</i>	<i>1,700</i>	<i>1,600</i>
Total waste	258,700	258,900

¹⁾ Missing prior-year data in the “energy recovery” and “incineration” categories is due to expansion of the waste categories queried in the 2021 financial year.

In the 2021 financial year, the volume of waste remained more or less constant compared to the previous year. 94 percent of the waste was recycled for materials and 2 percent for energy. The remaining 4 percent was either incinerated without energy recovery or sent to landfill and other disposal methods. Of the total 258,700 tons of waste, 1,700 was classified as hazardous; as in the previous year, the share was less than 1 percent.

Waste by type of material

in tons

	2021	2020
Paper	197,800	180,300
Plastics	3,600	600
Metals	4,200	1,800
Printing inks and other chemicals	1,500	1,500
Wood ¹⁾	4,000	-
Mixed waste ¹⁾	6,700	-
Other	40,900	74,700
Total waste	258,700	258,900

¹⁾ Missing prior-year data in the “wood” and “mixed waste” categories is due to expansion of the waste categories queried in the 2021 financial year.

In the 2021 financial year, about 76 percent of waste consisted of paper, e.g., from the printing processes of books and magazines. Metals and chemicals from the printing and production processes accounted for 5 percent of the waste, as did wood and plastic waste for the transport of products or materials. Mixed waste, such as residual waste, or

GRI**Disclosure****UNGC**

unclassified other waste accounted for the remainder. There is generally no differentiated reporting on this at the office sites.

Total waste

in tons

	2021	2020
RTL Group	1,260	1,050
Penguin Random House	20,570	22,150
Gruner + Jahr	2,110	1,940
BMG	20	40
Arvato	42,340	39,680
Bertelsmann Printing Group	191,920	193,610
Bertelsmann Education Group	10	20
Bertelsmann Investments	0	0
Corporate	450	440
Total waste	258,680	258,930

The recorded waste volumes differed from division to division. At 74 percent, Bertelsmann Printing Group's printing plants generated the largest share of total waste in the 2021 financial year. Waste volumes were down slightly by 1,690 tons compared to the previous year, in particular due to declining production volumes. The 2,600-ton increase in waste volumes from the Arvato division is attributable to the logistics business. The remaining divisions generated 10 percent of the recorded waste.

306-4 Waste diverted from disposal
See [GRI 306-3](#).

VIII

306-5 Waste directed to disposal
See [GRI 306-3](#).

VIII

GRI 400

Social

GRI 400 Social

GRI	Disclosure	UNGC
GRI 401	Employment 2016	
103	<p>Management approach 2016 (including GRI 103-1, 103-2, 103-3)</p> <p>Every day, 145,000 employees in about 50 countries work to ensure Bertelsmann’s business success, growth, and continuous development. This is the reason why, for generations, the company has made responsibility toward its employees a priority. Bertelsmann strives to create a working environment that is based on participation and partnership for all employees.</p> <p>To be an attractive employer for a diverse workforce, retain employees long-term, and remain competitive, Bertelsmann promotes the development of its employees, and creates the prerequisites for enabling both fair working conditions and a safe and healthy working environment. In particular, these include freedom, trust, and respect. Bertelsmann aspires to this all over the world, honoring widely varying social, economic, regulatory, and cultural conditions in the process.</p> <p>In addition, employees of all generations increasingly attach particular importance to meaning in the work they perform for their employer. To attract future employees, employers are expected to have and convey a greater sense of purpose. Only if employees are able to identify with their company, its values, and strategic objectives, they are able to actively implement and ensure that these objectives are achieved. This applies particularly in times of change.</p> <p>Bertelsmann strives to offer its employees fair framework conditions for their work. In addition to the protection of human and personal rights, partnership and trustworthy cooperation with employees and their representatives, workplace safety, fair distribution of benefits, flexible working arrangements, and fair treatment of freelancers and external service providers are among the key aspects of ensuring fair working conditions.</p> <p>Motivated employees are the most important asset for Bertelsmann’s business success and are essential to creativity and entrepreneurship. This corporate identity – anchored in the corporate constitution and the Bertelsmann Essentials – is the basis for the Executive Board Guidelines on HR work. Supplementary regulations are specified in the Bertelsmann Code of Conduct, which is binding for all employees (see GRI 102-16).</p> <p>The Chief Human Resources Officer (CHRO) is responsible for employee matters across the Group. The CHRO heads the corporate HR department, which supports the coordination of tasks and development of relevant HR policy and cooperates closely with the HR directors of the corporate divisions. The main focus of his work includes setting the strategic HR agenda, aligning management and talent development with the Group’s strategic growth priorities, the re- and upskilling and learning activities at Bertelsmann University, ensuring the standardization and IT support for HR processes, and further developing Corporate Responsibility (CR) and the corporate culture.</p> <p>To ensure stringent procedures in a decentralized organization, Bertelsmann’s HR function is organized according to a “dotted-line” concept, with complementary reporting as well as supervisory relationships. This allows Group-wide HR topics to be implemented in accordance with the Executive Board’s decisions.</p> <p>Another important aspect of Bertelsmann’s HR work is the exchange of information in committees:</p>	I, III, VI

GRI	Disclosure	UNGC
	<ul style="list-style-type: none"> ▪ The HR Committee determines the basic aspects of HR work in the interest of the whole Group. Its members are the heads of HR at the corporate divisions, who report to the CHRO and senior executives from the Group's corporate HR department. ▪ HR Country Coordination Meetings are designed for cross-divisional coordination within a region and ensure the implementation of Group-wide HR initiatives. Its members include the heads of HR of the Group's largest companies or those with the largest number of employees in the country concerned. ▪ The Nomination & Compensation Committees of the corporate divisions and Corporate Center decide on the implementation of remuneration and staffing policies in their areas of responsibility. 	
	<p>Responsibility for ensuring fair working conditions is decentralized, meaning it lies with the management of the local businesses. Bertelsmann provides Group-wide framework conditions that enable local businesses to fulfill this responsibility. Collective regulations (e.g., Group company agreements) and Executive Board Guidelines on certain topics, such as remuneration and the use of external employees, are also relevant in this regard. In addition, various formats e.g., the Bertelsmann Group Dialog Conference in Germany and an international, cross-divisional working group deal with topics such as a culture of partnership and fair working conditions. As the key contact person for the various bodies representing employee interests, Bertelsmann's CHRO accompanies or presides over these formats.</p>	
	<p>Bertelsmann is also subject to international conventions on the protection of human rights and fair working conditions, such as the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN "Free & Equal" Standards, the ILO Core Labor Standards, the OECD Guidelines for Multinational Enterprises, and Bertelsmann's voluntary commitment in accordance with the UN Global Compact (see GRI 102-12).</p>	
	<p>At Bertelsmann, remuneration issues are an integral part of fair working conditions. The compensation system is designed to ensure that remuneration is driven by market, function, and performance, taking into account business-specific characteristics. Numerous domestic and foreign subsidiaries have operational/divisional success and profit-sharing models adapted to local requirements. In 2021, a total of €88 million was distributed as part of such participation schemes globally.</p>	
	<p>Participation in decision-making processes and the granting of the greatest possible freedom contribute to employee loyalty and satisfaction. To support a healthy work-life balance, this also includes offering employees flexible arrangements about where and when they work. Working-time models that focus on results rather than physical presence have become widespread, partly also because of the coronavirus crisis. In 2021, Bertelsmann developed and communicated a Group-wide basic approach to New Work and set up a cross-divisional exchange format.</p>	
	<p>The flexibility requirements of a rapidly changing world of work also mean that knowledge and expertise need to be sourced from outside the company to ensure satisfied customers during peak phases. The company relies on staffing agencies and employs external personnel in addition to permanent employees where the specifics of the tasks allow and require this. Bertelsmann defines external personnel as persons who work for the company as self-employed, for service providers, consultancies, or as temporary agency staff for a Group company. The employment of external personnel must be in accordance with the company's values. The Executive Board Guideline on the Engagement of External Personnel requires standard processes to ensure compliance with legal requirements. This is</p>	

GRI	Disclosure	UNGC
	<p>supplemented by the Supplier Code of Conduct, which is also binding for service providers (see GRI 102-16).</p> <p>In 2021, the company defined strategic objectives relating to fair working conditions and developed measures from those, as part of the Bertelsmann CR Program (2021–2023). These include the further development of a Group-wide management approach to fair working conditions and respecting human rights, the further development of processes for identifying risks concerning human rights issues, and the continuous advancement of knowledge on these topics.</p>	
401-1	<p>New employee hires and employee turnover</p> <p>Bertelsmann does not currently publish information on employee recruitment or fluctuation. This data, categorized by age, gender, and region, is not yet fully available and of sufficient quality for publication.</p>	VI
GRI 402	Labor/Management Relations 2016	
103	<p>Management approach 2016 (including GRI 103-1, 103-2, 103-3)</p> <p>Bertelsmann sees the continuous dialog between employee representatives and company management as a key element in its company culture. Additionally, regular dialog with employees and their representatives makes it possible to continually review working conditions, identify possible improvements, and derive measures. Digital transformation is changing the work environment and every individual's tasks. At Bertelsmann, this process also includes the restructuring of several traditional businesses. Parallel to this, some parts of the company are being dismantled while others are reorganized, expanded, or newly built. The management sees change as both a challenge and an opportunity and seeks to shape change together with its employees.</p> <p>Although Bertelsmann, as a media company, is free to determine its political direction as defined in the German Works Constitutions Act ("Tendenzschutz") and therefore is not subject to statutory co-determination in the Supervisory Board, the company nevertheless makes four positions on the Supervisory Board of Bertelsmann SE & Co. KGaA available to employees on a voluntary basis. Three of them are occupied by leading Works Council members of German Group companies. Since June 1, 2021, Núria Cabutí, Chief Executive Officer of Penguin Random House Grupo Editorial, has been a member of the Supervisory Board in her capacity as Chair of the international Bertelsmann Management Representative Committee. In addition, managers, general workforce, employees with disabilities, and trainees all have platforms for exchanging ideas, advancing topics, and voicing their concerns. A proven format is the Bertelsmann Group Dialog Conference where the Chief Executive Officer, the Chief Human Resources Officer of Bertelsmann, and members of the Works Councils from the corporate divisions in Germany meet for consultation and discussion. In 2021, this led to intensive collaboration and cross-divisional exchange beyond the scope of the committees required by law, e.g., to analyze measures from the Employee Survey and to address the impact of the coronavirus pandemic on the framework conditions for cooperation. In addition, a Group Inclusion Agreement was concluded for the first time for all operations of Bertelsmann SE & Co. KGaA and its Group companies in Germany. In German Bertelsmann companies, it improves the participation of people with disabilities alongside the implementation of the Bertelsmann Action Plan for Inclusion (2019–2024).</p> <p>Employees are also involved in the development and improvement of working conditions through standardized HR tools (Performance and Development Dialogs, Agreements on Objectives, and Team Talks) and through Bertelsmann's international Employee Survey.</p>	III

GRI	Disclosure	UNGC
	The Employee Survey has been a key element of Bertelsmann's corporate culture since 1977 and was carried out in 2021 as scheduled. An improvement in the survey results was achieved for all questions at Group level.	
402-1	Minimum notice periods regarding operational changes	III
	Bertelsmann takes care to ensure that employees are informed of the management's plans as early as possible and to involve employee representatives in change processes at an early stage. Particularly in the case of necessary staff reduction measures, the objective is to achieve clarity for the employees affected as early as possible. In many cases, the company exceeds the statutory requirements set out in provisions, e.g., the German Works Constitution Act ("Betriebsverfassungsgesetz"). If jobs are at risk, a development and transfer center offers early advice and further training for affected employees to support their transition to new tasks within the Group. In addition, the Bertelsmann transfer company creates framework conditions to actively facilitate the structural transformation of German companies. To avoid layoffs for operational reasons, programs were also launched to find solutions with employees for an amicable and socially acceptable termination of employment contracts at an early stage.	
GRI 403	Occupational Health and Safety 2018	
103	Management approach 2016 (including GRI 103-1, 103-2, 103-3)	I
	<p>Bertelsmann aims to create a health-promoting working environment and conditions for avoiding occupational health risks. The Corporate Responsibility (CR) department is responsible for developing and implementing the Group-wide Health & Well-being strategy. Jointly with an international, cross-divisional working group established in 2021, it defines the strategic framework for health-related topics.</p> <p>In Germany, employees from the Health and Human Resources (HR) departments, Works Councils members, and Representatives of Employees with Disabilities work together in a "Health Community," e.g., on the further development of minimum health standards. At the sites of the corporate divisions, contact persons for health drive forward their implementation. In addition, there is an Operational Integration Management ("Betriebliches Eingliederungsmanagement," BEM), which is supported by local integration teams.</p> <p>In 2021, Health & Well-being was confirmed as a Group-wide CR priority, defined as a Group-wide focus of the Chief Human Resources Officer, and further developed as part of the Bertelsmann CR Program (2021–2023). In addition to the strategic and organizational further development of the Health & Well-being topic and the management of the coronavirus crisis, two other relevant fields were defined. These include the empowerment of executives to create a healthy and safe working environment and corporate culture; and the support of employees to adopt healthy working habits and lifestyle, with measures also being taken to enhance individual resilience. On the level of measures, the focus in 2021 was initially on strategic and organizational anchoring.</p> <p>Due to the ongoing coronavirus pandemic, the immediate health protection of all employees worldwide remained critical in 2021. Emphasis of infection control was placed on the vaccination against the coronavirus, the development of the necessary infrastructure in the corporate divisions, and other prevention and protection measures (see GRI 403-3).</p>	

GRI	Disclosure	UNGC
403-1	Occupational health and safety management system	I
	<p>At Bertelsmann, responsibility for implementing occupational health and safety, and thus also for corresponding management systems, is decentralized to the corporate divisions. For the most part, corporate divisions already have cross-site occupational health and safety management systems which are guided by common occupational health and safety standards, e.g., the Occupational Health and Safety Standards (ISO45001), and take into account the relevant statutory occupational health and safety requirements. In some cases, occupational health and safety is integrated into the company's Health, Safety, Security & Environment (HSSE) organization.</p> <p>In Germany, the Bertelsmann Occupational Safety team in the Bertelsmann Real Estate & Services department at the Corporate Center supports about 15,000 employees of Arvato, Bertelsmann Accounting Services, and Bertelsmann Corporate. The Group's own Company Medical Services (see GRI 403-3) are responsible for about 14,000 employees in the Gütersloh region and at other Bertelsmann sites in Germany. The Bertelsmann Occupational Safety team and the Company Medical Services advise numerous other German Bertelsmann companies on occupational health and safety obligations and standards set out in the German Occupational Safety Act ("Arbeitssicherheitsgesetz").</p> <p>The company's internal IT platforms are used to map structures and data required under German occupational health and safety law on a daily basis and in compliance with data protection requirements, e.g., the number and training status of safety officers, documentation of recurring instructions, monitoring of training and appointment of company emergency responders, and company-relevant preventive medical check-ups. For this purpose, employees with various occupational health and safety tasks, e.g., occupational safety specialists, safety officers, and contact persons for accidents, health, and risk assessment, are involved at all associated companies.</p>	
403-2	Hazard identification, risk assessment, and incident investigation	I
	<p>At Bertelsmann, responsibility for hazard identification, risk assessment, and incident investigation is decentralized to the corporate divisions. Internationally, occupational health and safety risk assessments are conducted at individual Bertelsmann companies. For this purpose, internal checklists and validated questionnaires are used. In some cases, site inspections are carried out for additional identification of existing hazard potentials as well as further measurements of noise, brightness, and climate.</p> <p>In Germany, the findings as well as any workplace accidents are discussed at Occupational Safety Committee meetings. Several German companies have established processes (reporting system) for dealing with incidents and near-accidents. In addition, a legally mandated mental health risk assessment is implemented.</p> <p>In 2021, for early hazard identification of psychosocial issues, workshops with health working groups were held at the divisional level in Germany based on health-related results of the Employee Survey. Communication materials on health-related action fields were made available throughout the Group.</p>	
403-3	Occupational health services	I
	<p>In Germany, the deployment of company physicians, including their qualifications and tasks, is prescribed by law and by the regulations of professional associations ("Berufsgenossenschaften"). In addition to its own Company Medical Services, Bertelsmann works with external company physicians at the respective sites to ensure that these requirements are met (see GRI 403-1). In order to ensure a similar range of services at all sites, external company physicians are guided by the portfolio of Bertelsmann's own Company Medical Services in Gütersloh. The range of services offered by the company</p>	

GRI	Disclosure	UNGC
	<p>physicians and their communication materials are displayed on the company's internal intranet.</p> <p>In 2021, the Group-wide focus was on the immediate health protection of all employees and the provision of a vaccination offer, subject to the respective regional legal regulations (see GRI 403 Management approach). Bertelsmann's Company Medical Services played a pivotal, advisory role in Germany. The Company Physician was a permanent member of the central Crisis Task Force and of local crisis teams. All employees in Germany received a vaccination offer through the Company Medical Services or regional company physicians. Vaccination centers for employees and their families were also established in the Gütersloh region and in Cologne.</p> <p>At the German sites, the local crisis teams implemented hygiene and protection measures, such as working from home or providing masks, disinfectants, and coronavirus-testing facilities. In cooperation between the local crisis teams and health working groups, a wide range of support services were provided to maintain mental and physical health and were accompanied by extensive internal communication activities.</p>	
403-4	<p>Worker participation, consultation, and communication on occupational health and safety</p> <p>At Bertelsmann, responsibility for employee participation, consultation, and communication on occupational health and safety is decentralized to the corporate divisions. At individual Bertelsmann companies, health and occupational safety committees have already been established and meet regularly, e.g., to analyze relevant topics and develop targeted measures.</p> <p>In Germany, Occupational Safety Committee meetings are required by law, are organized quarterly, and carried out locally. Participants include the employer or a management representative appointed by the employer, members appointed by the Works Council, the Company Physician, the Occupational Safety Specialist, the Safety Officer, and the Representative for Employees with Disabilities. Responsibility for all decisions and measures taken lies with the management of each company. The Company Physician, the Occupational Safety Specialist, and the Safety Officer are involved as advisors without the right to issue instructions. The representatives of the Works Council exercise a supervisory function in the interests of the employees.</p>	I
403-5	<p>Worker training on occupational health and safety</p> <p>Occupational health and safety trainings for employees and the organization of other relevant measures are carried out independently by the Bertelsmann corporate divisions. Depending on the function, activity, and degree of hazard, such trainings are conducted online and/or (moderated) in person and are documented.</p>	I
403-6	<p>Promotion of worker health</p> <p>Bertelsmann's corporate divisions provide their employees with numerous offerings to support mental and physical health and preventive healthcare. In 2021, a large proportion of the health support offerings was provided in a digital format to ensure participation of employees working from home. The focus was in particular on mental health and corresponding digital and in-person support services, e.g., on the topics of resilience, relaxation, mindfulness, mental health first aid, and family support during the coronavirus pandemic. In this context, the Company Social Counseling Service (Germany) and the Employee Assistance Program (international) were continuously promoted. In addition, digital fitness and exercise offerings were used to encourage more physical activity in the daily work routine. The offerings are presented in the company's internal intranets.</p>	I

GRI	Disclosure	UNGC																											
	In addition, other health-related projects were implemented at the divisional level in Germany, such as the “Digital Moving Break” offering, the “Fit for Work” campaign, training courses on health-oriented leadership, ergonomics in the home office, and health days. Here, the Bertelsmann Company Health Insurance provides health-related offerings tailored to the work situation, such as the “Phileo” app for supporting mental health or the “Running Coach,” which the Bertelsmann corporate divisions have access to.																												
403-7	<p>Prevention and mitigation of occupational health and safety impacts directly linked by business relationships</p> <p>Product safety for customers is anchored in the Bertelsmann Code of Conduct (see GRI 102-16): “Our products must not contain defects or unsafe features that could have adverse effects on health or property” (see GRI 417).</p> <p>If external parties work for the company, their assignment and employment must be in accordance with the corporate values of Bertelsmann (see GRI 401). In the case of cooperation with external companies, the implementation of safety briefings is ensured subject to the situation concerned. In several German companies, external company coordinators are already employed. They accompany and monitor the activities of external companies, e.g., cleaning services of buildings, repair companies, maintenance companies, or inspection organizations.</p>	I																											
403-8	<p>Workers covered by an occupational health and safety management system</p> <p>Due to the decentralized organizational occupational health and safety structures, this data is not yet centrally available in a systematic manner at Bertelsmann (see GRI 403-1).</p>	I																											
403-9	<p>Work-related injuries</p> <p>Due to the decentralized organizational occupational health and safety structures, this data is not yet centrally available in a systematic manner at Bertelsmann.</p>	I																											
403-10	<p>Work-related ill health</p> <p>Absenteeism in Germany in days</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">2021</th> <th style="text-align: center;">2020</th> </tr> </thead> <tbody> <tr> <td>Ø No. of vacation days taken</td> <td style="text-align: center;">26.5</td> <td style="text-align: center;">27.5</td> </tr> <tr> <td>Ø No. of paid sick days</td> <td style="text-align: center;">10.1</td> <td style="text-align: center;">12.0</td> </tr> <tr> <td>Ø No. of days of other paid leave</td> <td style="text-align: center;">2.5</td> <td style="text-align: center;">2.7</td> </tr> <tr> <td>Paid leave¹⁾</td> <td style="text-align: center;">39.1</td> <td style="text-align: center;">42.2</td> </tr> <tr> <td>Ø No. of unpaid sick days</td> <td style="text-align: center;">5.0</td> <td style="text-align: center;">5.5</td> </tr> <tr> <td>Ø No. of days of other unpaid leave</td> <td style="text-align: center;">3.0</td> <td style="text-align: center;">2.8</td> </tr> <tr> <td>Unpaid leave</td> <td style="text-align: center;">8.0</td> <td style="text-align: center;">8.3</td> </tr> <tr> <td>Total sick leave²⁾ in %</td> <td style="text-align: center;">6.0</td> <td style="text-align: center;">7.0</td> </tr> </tbody> </table> <p>¹⁾ Paid leave without maternity leave ²⁾ Sick leave as defined by Bertelsmann SE & Co. KGaA: Sick leave quota = average number of sick days / target workdays; target workdays = calendar days - Saturdays/Sundays - official holidays (x = 365 - 104 - 10 = 251)</p>		2021	2020	Ø No. of vacation days taken	26.5	27.5	Ø No. of paid sick days	10.1	12.0	Ø No. of days of other paid leave	2.5	2.7	Paid leave¹⁾	39.1	42.2	Ø No. of unpaid sick days	5.0	5.5	Ø No. of days of other unpaid leave	3.0	2.8	Unpaid leave	8.0	8.3	Total sick leave²⁾ in %	6.0	7.0	I
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GRI	Disclosure	UNGC
	<p>In the 2021 financial year, the average number of paid sick days per employee in Germany decreased by 1.9 days year on year; this corresponds to the overall trend. As in 2019 and 2020, there was a decrease in absenteeism related to mild and short-term respiratory illnesses (flu and colds), particularly in the first quarter. Possible reasons for this include the measures taken to prevent coronavirus infections, such as company hygiene and distancing concepts, vaccinations, and working from home. Quarantine periods did not affect the number of certified sick days, provided that work was done from home during these periods. The average number of unpaid sick days decreased slightly by 0.5 days. Any further interpretation of this marginal change is not useful.</p> <p>Bertelsmann does not report this information broken down by freelance and external employees and does not provide any information on fatalities. Due to labor law regulations in Germany, Bertelsmann does not have any information on the main types of work-related illnesses of its employees. The number of documentable work-related illnesses in Germany is recorded in the form of sick days (see table). Work-related hazards that pose a risk of illness are determined in the form of regular assessments of occupational health and safety risks and appropriate measures are initiated to eliminate the identified hazards and minimize risks (see GRI 403-2).</p>	

**GRI
404**

Training and Education 2016

103

Management approach 2016 (including [GRI 103-1](#), [103-2](#), [103-3](#))

I

For Bertelsmann, training and education are a long-term investment in the company's future and in the stability of society. In order to be successful and attractive as a company, it is crucial to continuously train employees in success-critical skills and competencies. Major changes, such as the digital transformation of media, services, and education, the demographic shift, or repercussions of the coronavirus pandemic, can only be tackled with qualified and motivated employees.

Bertelsmann thus aims to empower employees at all levels to adapt to the challenges of a quickly changing environment and to continuously learn from and with one another. This is reflected, among other things, in the fact that the topic of learning ("upskilling") was highlighted as an important enabler in Bertelsmann's new strategy framework. Great importance is also attached to an open learning culture that embraces experimentation as an element of creativity in the Bertelsmann Essentials.

In 2021, the company defined strategic objectives relating to learning as part of the Bertelsmann CR Program (2021–2023). These include developing a re- and upskilling approach, empowering and networking managers to facilitate the future-oriented design of the Bertelsmann transformation, expanding the offerings on business-critical competencies for all employees (e.g., tech & data), and promoting a learning culture.

With regard to measures, a target-actual analysis of tech & data roles was carried out in 2021 to identify qualification gaps. In addition, the company launched the digital program series "Be-Ready" for top executives with a focus on "Strategy in the Transformation." The three-year Udacity technology scholarship program was continued for the third year, providing 50,000 scholarships for which both Bertelsmann employees and external candidates are eligible to apply. A new tech & data offering was also added to the Group-wide digital peer-to-peer learning format "Your Campus."

Bertelsmann University

This central learning organization systematically addresses three target groups with its international offering. For top executives and talents across the Bertelsmann Group, it offers programs on strategy and leadership; for creative experts programs on creativity and innovation; and for all employees programs on tech & data. The central focus areas for learning are supplemented by division-specific training initiatives. Employees worldwide are thereby given access to central and division-specific training courses and to more than 15,000 freely accessible online courses by LinkedIn Learning and almost 2,000 online courses by CreativeLive. Thanks to these digital formats, learning content is flexibly available to employees and executives. Time and place of learning is geared to individual needs and organizational requirements.

Bertelsmann University is a main department at the Bertelsmann Corporate Center. It is led by the Chief Learning Officer, who is responsible for the Group’s learning strategy and reports to the Chief Human Resources Officer. The Executive Board, Group Management Committee (GMC), and Human Resources (HR) Committee regularly discuss and review Bertelsmann University’s orientation and activities. It is supported by the Divisional Learning Committee, in which Learning & Development representatives from the corporate divisions coordinate, exchange, and collaborate with each other.

Training in Germany

In Germany, Bertelsmann offers young people industrial and commercial training options in more than 40 different disciplines. In addition to traditional apprenticeship programs, this spectrum also includes a variety of dual-study programs. With its offering, Bertelsmann is one of Germany’s largest apprentice-training companies and a protagonist in shaping the vocational training landscape. Bertelsmann is also involved in regional and national working groups and committees to address education policy issues and drive forward important developments. Among the major challenges to be overcome is the future-proofing of training programs to prevail in the intensified competition for highly qualified junior employees and enable young people in Germany to get off to a good start in their professions.

The corporate Education department is responsible for training measures at the Gütersloh site. It develops offerings based on the company’s changing needs and requirements and ensures that they reflect the company’s values of creativity and entrepreneurship. The department works closely with the executives and HR managers of the training companies as well as the Works Council. In Gütersloh alone, more than 630 young people are currently learning a profession or completing a part-time Bachelor of Arts or Bachelor of Science degree. Of these, about 200 students are undergoing industrial and commercial training at the Group’s own vocational college. Bertelsmann also cooperates with universities to offer part-time master’s degree programs in IT Management and Business Consulting & Digital Management. The introduction of another master’s degree program in Data Science is in planning. In 2021, Bertelsmann’s corporate Education and the cooperating departments were once again recognized for their high quality by the independent Institute of Research & Data Aggregation – they are among the “top 1% of German apprentice-training companies.”

404-1 Average hours of training per year per employee

I

Total training

in hours

2021	2020
305,334	353,363

Basis: all training data entered on the digital HR platform “peoplenet”

Share of digital training hours

in percent

2021	2020
91	53

Basis: all training data entered on the digital HR platform "peoplenet"

The absolute number of training hours decreased in 2021 compared to 2020. During the coronavirus pandemic, the share of digital training hours soared from 53 to 91 percent, following an increase in the previous year.

Bertelsmann does not currently report training hours broken down by gender and other employee categories, since this information is not available centrally. Bertelsmann continues to develop its data collection in this respect and aims to report these figures in the medium term.

404-2 Programs for upgrading employee skills and transition assistance programs

Helping to ensure employees' long-term employability by offering lifelong learning programs is both a commitment and a challenge for Bertelsmann. Bertelsmann University has defined three objectives in its efforts to support employee performance: to build future-oriented employee skills, strengthen the company and leadership culture, and develop the digital learning infrastructure. Progress is measured, among other things, by the digitization rate (share of digital training hours).

With its training offerings in Germany, in particular the Group's vocational college at the corporate headquarters, Bertelsmann seeks to train well-qualified junior employees for the company's various lines of business and fill vacancies via the in-house job market. Due to the increasing technologization and digitalization of subjects in many corporate divisions, the number of graduates in IT training courses in particular was maintained at a high level and even expanded in some areas. Other results included:

- enhancement of perspectives and opportunities in the Group's own study degree programs through a future-oriented range of digital learning content and modern working methods;
- adaptation of vocational training and study courses to changing practical requirements, in particular against the background of new forms of work;
- creation of additional opportunities for further development by offering master's degree programs in cooperation with universities (see **GRI 404 Management approach**).

Active support is provided for and during the structural transformation of companies (see **GRI 402-1**).

GRI 405 Diversity and Equal Opportunity 2016

103 Management approach 2016 (including GRI 103-1, 103-2, 103-3) I, VI

A holistic approach to managing Diversity, Equity & Inclusion (DEI) not only serves to increase diversity in the workforce, but also promotes a culture of appreciating diversity and authenticity. In combination with a constant, ongoing review and adaptation of structures and processes, all employees shall be able to reach their full potential.

GRI	Disclosure	UNGC
	<p>This creates the framework conditions for diversity of perspectives – based on diverse competencies, backgrounds, and experiences – to have a positive impact on corporate decision-making processes.</p> <p>Managing DEI is a prerequisite for diversity of perspectives and social representation. This provides the framework on which media, products, and services can be developed successfully and in line with target groups in the long term. In addition, the importance of DEI for the business success is reflected in the steadily increasing requirements from legislators and business partners. DEI contributes also to strengthening the attractiveness of the company as an employer.</p> <p>For Bertelsmann, diversity and differences in the workforce are prerequisites for creativity, innovation, and the company's long-term business success. This conviction is conveyed in the Bertelsmann Essentials and in the Executive Board's DEI Policy, which was adopted in 2021. In this policy, the Bertelsmann Executive Board reaffirms its intention to further increase the diversity of staff at all levels and in every respect and to create appropriate framework conditions that foster the appreciation and involvement of employees and ensure equal opportunities. A culture of respect and belonging, in which employees are valued for their diverse backgrounds, perspectives, and talents, makes Bertelsmann a more open-minded company. The Bertelsmann Code of Conduct also mandates a respectful and appreciative treatment of all employees (see GRI 102-16). The Executive Board Guideline on Principles of Hiring Policy also provides orientation in addressing diversity.</p> <p>The Executive Board bears the strategic responsibility for DEI within the Group. The DEI strategy is implemented by the Corporate Responsibility (CR) department, which is responsible for DEI, with support from a Group-wide and other working groups in the corporate divisions. In addition, executives, human resources and communications managers in particular are responsible for visibly living and implementing DEI in practice through their role model function. The focus in 2021 was on the following dimensions: gender, disability, sexual orientation, and gender identity. In line with the Group's decentralized structure, some of the corporate divisions also set – based on local conditions and business models – in part additional priorities. The Bertelsmann website provides an overview of the DEI measures at Bertelsmann and in the corporate divisions at www.bertelsmann.com/diversity.</p> <p>To further enhance diversity at the management levels, Bertelsmann had also set itself the target of raising the ratio of women in top management and senior management across all corporate divisions to one-third by the end of 2021. While the proportion of female executives in senior management was unchanged from the previous year, Bertelsmann did further increase the ratio in top management. That figure is now 30 percent in both target groups (see GRI 405-1). In addition, the targeted proportion of women in the talent pools was set at one-third for the top and senior management pools and 50 percent for the career development pool. These target figures were met in all three pool cohorts in 2021. The Bertelsmann Supervisory Board and the Executive Board are notified annually of progress in regard to these targets.</p> <p>In 2021, the company defined strategic objectives relating to DEI as part of the Bertelsmann CR Program (2021–2023). These include the greater involvement of the Executive Board and top management into DEI engagement, the strategic further development of Diversity Management into Diversity, Equity & Inclusion Management, the professionalization of the governance structures for DEI in the corporate divisions, and awareness raising and competence development in relation to DEI. In this context, the Bertelsmann Executive Board's DEI Policy was also communicated more intensively throughout the Group.</p>	

GRI Disclosure**UNGC**

The **Bertelsmann Action Plan for Inclusion (2019–2024)** aims to design processes and structures at German companies in such a way that employees with disabilities can work in a barrier-free environment and thus contribute to Bertelsmann’s business success to their full potential. It comprises 27 targets and 69 measures. The second evaluation of the implemented measures took place as scheduled after the second year; the results can be viewed on the Bertelsmann website: www.bertelsmann.com/disability-and-inclusion. In addition, the first-ever Group Inclusion Agreement, covering all Bertelsmann SE & Co. KGaA operations and group companies in Germany, was concluded.

Bertelsmann’s LGBTIQ+ employee network “be.queer” continued its activities in 2021 and advanced international collaboration with the LGBTIQ+ networks in the corporate divisions. In addition, a wide range of anti-racism measures were also implemented in the company, including Group-wide training offerings and measures to raise awareness.

Gender-neutral compensation

The equal treatment of women and men set out in the Code of Conduct explicitly applies to compensation as well. The compensation system is intended to ensure that remuneration is exclusively driven by the market, function, and performance – and is therefore gender-neutral. Insofar as explicit job, function, and position descriptions or position endowments exist, these are also defined in a gender-neutral manner. Women and men in comparable markets, in comparable positions, and delivering a comparable performance have equal earning opportunities.

405-1 Diversity of governance bodies and employees**I, VI****Gender breakdown**

in percent

	Supervisory Board		Executive Board		GMC		Top management ^{1) 2)}		Senior management ^{1) 3)}		Employees	
	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020
Women	31	23	0	0	28	33	30	27	30	30	54	54
Men	69	77	100	100	72	67	71	73	71	71	46	46

Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31. Rounding differences may occur.

¹⁾ Top and senior management comprises those positions that are of particular importance because of their success-critical function and their strategic relevance for the Group’s continued transformation and the achievement of its strategic targets. Top management positions comprise GMC positions, but not Executive Board positions.

²⁾ Basis: employees on permanent and temporary contracts as of December 31; with gender indication 2021 (100 percent), with gender indication 2020 (90 percent), limited comparability.

³⁾ Basis: employees on permanent and temporary contracts as of December 31; with gender indication 2021 (91 percent), with gender indication 2020 (93 percent), limited comparability.

Average age

in years

Supervisory Board		Executive Board		GMC	
2021	2020	2021	2020	2021	2020
60	59	52	52	55	54

As of December 31.

GRI Disclosure

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Age distribution

in percent

	Supervisory Board		Executive Board		GMC		Top management 1) 2)		Senior management 1) 3)	
	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020
≤ 25 years	0	0	0	0	0	0	0	0	0	0
26 - 30 years	0	0	0	0	0	0	0	1	0	0
31 - 35 years	0	0	0	0	0	0	3	3	2	2
36 - 40 years	0	0	0	0	0	0	6	6	5	9
41 - 45 years	0	0	25	0	6	6	9	10	18	21
46 - 50 years	8	15	0	25	22	33	22	27	24	26
51 - 55 years	31	31	50	75	33	39	27	25	30	26
56 - 60 years	31	23	25	0	22	6	24	19	17	13
61 - 65 years	8	8	0	0	0	0	5	6	5	3
> 65 years	23	23	0	0	17	17	4	3	0	1

Basis: members of the bodies as of December 31. Rounding differences may occur.

1) Top and senior management comprises those positions that are of particular importance because of their success-critical function and their strategic relevance for the Group's continued transformation and the achievement of its strategic targets. Top management positions comprise GMC positions, but not Executive Board positions.

2) Basis: employees on permanent and temporary contracts as of December 31; with age indication 2021 (85 percent), with age indication 2020 (86 percent), limited comparability.

3) Basis: employees on permanent and temporary contracts as of December 31; with age indication 2021 (69 percent), with age indication 2020 (74 percent), limited comparability.

Age pyramid employees worldwide

in percent

	2021		2020	
	Men	Women	Men	Women
≤ 25 years	9.4	11.6	9.0	11.0
26 - 30 years	9.5	11.0	8.9	10.6
31 - 35 years	6.8	8.2	6.8	8.2
36 - 40 years	5.3	6.2	5.5	6.3
41 - 45 years	4.1	5.1	4.3	5.0
46 - 50 years	3.6	4.0	4.0	4.2
51 - 55 years	3.3	3.5	3.7	3.8
56 - 60 years	2.6	2.6	2.8	2.8
61 - 65 years	1.2	1.2	1.2	1.2
> 65 years	0.4	0.4	0.3	0.3
Total	46.2	53.8	46.5	53.4

Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31. Temporary employees of RTL Group are not included. Rounding differences may occur.

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As a company that operates in about 50 countries around the world, Bertelsmann employs 145,000 employees of many different nationalities. To ensure that these different perspectives are also taken into account in important corporate decisions, a variety of nationalities are represented on the Group Management Committee (GMC).

Number of nationalities represented in the GMC

2021	2020
6	6

As of December 31.

Internationality quota

in percent

	Supervisory Board		Executive Board		GMC	
	2021	2020	2021	2020	2021	2020
German	69	77	100	100	72	72
Non-German	31	23	0	0	28	28

As of December 31.

Share of employees with severe disabilities in Germany

in percent

2021	2020
4.2	4.9

Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31.

In the 2021 financial year, the share of employees with severe disabilities fell slightly compared to the previous year. Bertelsmann strives to increase the share of employees with severe disabilities. With regard to the German companies, this is expressed not only in the Bertelsmann Action Plan for Inclusion (2019–2024) adopted in 2019, but also in the new Group Inclusion Agreement concluded as of October 1, 2021.

GRI
406

Non-discrimination 2016

103

Management approach 2016 (including GRI 103-1, 103-2, 103-3)

I–II, VI

The Code of Conduct and the Supplier Code of Conduct (see **GRI 102-16**) contain a clear prohibition of discrimination and intimidation, which is also expressed in the Bertelsmann Diversity, Equity & Inclusion (DEI) Policy (see **GRI 405**). In addition to existing speak-up channels, AGG contact persons have been appointed at all German locations. Employees can contact them in the event of suspected violations of the German General Equal Treatment Act (“Allgemeines Gleichbehandlungsgesetz,” AGG). Employees are informed about their rights under the AGG by means of brochures, posters, and information provided on the company’s internal intranet. Throughout the Group, employees were sensitized to the issue of anti-discrimination in Code of Conduct trainings and made aware of their rights. These and other international activities are being continuously developed. In the United States, for example, the company has stepped up training to prevent sexual harassment and racism in the workplace.

GRI	Disclosure	UNGC
406-1	Incidents of discrimination and corrective actions taken	I-II, VI
	<p>Bertelsmann does not report case numbers, since such incidents are subject to special confidentiality requirements. All reports of suspected compliance violations received are reviewed and examined in accordance with the procedures set out in the Group Guidelines. If a violation is confirmed, appropriate remediation measures are taken. Details on case categories, case numbers, and total numbers of reports received are regularly reported to the Bertelsmann Corporate Compliance Committee, the Executive Board, as well as to the Audit and Finance Committee of the Supervisory Board. Further details on this are subject to trade secrecy provisions.</p>	
GRI 407	Freedom of Association and Collective Bargaining 2016	
103	Management approach 2016 (including GRI 103-1, 103-2, 103-3)	I-III
	<p>The protection of human rights within the company and in the supply chains is a priority for Bertelsmann. Bertelsmann is committed to the Principles of the Universal Declaration of Human Rights, the Principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the UN “Free & Equal” Standards, the OECD Guidelines for Multinational Enterprises, and the ILO Core Labor Standards. Ensuring fair working conditions is an integral part of Bertelsmann’s corporate culture. Bertelsmann sets binding human rights standards in the company as well as in the global supply chains, which must be adhered to by all employees and business partners. Key corporate guidelines that address the issue of human rights and codify these standards are the Bertelsmann Code of Conduct, the Bertelsmann Supplier Code of Conduct, as well as the Executive Board Guideline on Anti-corruption & Integrity (see GRI 102-16).</p> <p>The Code of Conduct and the Supplier Code of Conduct reaffirm the right to freedom of association and the right to engage in collective bargaining, in accordance with applicable laws and regulations, for all employees of Bertelsmann companies as well as those of business partners. At Bertelsmann, violations of this principle can be reported via the speak-up channels of Bertelsmann’s existing compliance management system, both by employees and by third parties (see GRI 102-17).</p>	
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	I-III
	See GRI 407 Management approach .	
GRI 408	Child Labor 2016	
103	Management approach 2016 (including GRI 103-1, 103-2, 103-3)	I-II, V
	<p>Bertelsmann does not tolerate child and forced labor and expects its business partners to share this position. The Code of Conduct and the Supplier Code of Conduct contain accordingly explicit prohibitions (see GRI 102-16). In addition, Bertelsmann and individual Group companies issued statements in accordance with the UK Modern Slavery Act that condemn all forms of modern slavery, child and forced labor, exploitation, and discrimination, and present the measures taken to prevent these human rights violations.</p>	

GRI	Disclosure	UNGC
408-1	Operations and suppliers at significant risk for incidents of child labor See GRI 408 Management approach .	I-II, V
GRI 409	Forced or Compulsory Labor 2016	
103	Management approach 2016 (including GRI 103-1, 103-2, 103-3) See GRI 408 .	I-II, IV
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor See GRI 408 .	I-II, IV
MSD	Freedom of Expression	
103	Management approach 2016 (including GRI 103-1, 103-2, 103-3) Media report and entertain, clarify, show connections, and form the basis for freedom of information as well as formation and diversity of opinions in society. They are an integral and indispensable part of the democratic social order and thus systemically relevant. The company sees censorship and attempts of political influence in markets, in which Bertelsmann is internationally active, as a risk to its media businesses and resolute opposition to it as an opportunity. Bertelsmann is aware of the responsibility it has toward the public in its role as an opinion-shaper and handles this responsibility with care. With this in mind, the company sees the independence of its content a matter of course, including vis-à-vis its advertising business partners. Creativity is one of Bertelsmann's two core values. Free and critical thinking and the exchange of different opinions are essential to innovation and thus part of the company's value system. With regard to its content businesses, Bertelsmann stands for editorial and journalistic independence as well as for freedom of the press and artistic license. The company publishes a wide variety of opinions and positions. These basic principles of the content businesses are also set forth in the Bertelsmann Code of Conduct (see GRI 102-16). Bertelsmann aims to ensure this creative/journalistic independence in two directions. Inside the company, it means that the company management does not attempt to influence the decisions of artists, authors, editors, program managers, or any other content managers, or to restrict their freedom. To the outside, this means that both content managers and company management comply with existing laws regarding the separation of editorial content and commercial advertising and do not capitulate to political or economic influence in their coverage. In accordance with the Bertelsmann "Editor-in-Chief Principle," editorial decisions are the sole responsibility of the content managers. To discuss issues relating to press freedom and editorial and journalistic independence, share information, current challenges, and best practices, exchange takes place in a cross-divisional Bertelsmann working group of representatives of the corporate content divisions – RTL Group, Penguin Random House, Gruner + Jahr, and BMG. The editor-in-chief of RTL Group's German news channel, ntv, chairs this working group.	I-II

GRI	Disclosure	UNGC
	<p>In 2021, the company defined strategic objectives relating to creative/journalistic independence as part of the Bertelsmann CR Program (2021–2023). These include guaranteeing the safety and health of journalists, continuously developing high-quality news reporting output, and creating an environment that supports creative/journalistic independence and that reflects the diversity of perspectives and differences of people and their opinions, ideas, and stories.</p> <p>Measures derived from this and already implemented in 2021 include a “Violence against Journalists” checklist, which was developed by RTL Deutschland. The list is intended to help minimize the risk of violence in the run-up to and during filming and to find the right contact person as needed. Under the title “JAhr zur Wahrheit. Weil’s stimmen muss” (roughly: “[Y]ear of Y]es to truth. Because it has to be true”), the Bertelsmann Content Alliance companies in Germany advocated journalistic integrity, quality, and responsibility and campaigned against the manipulation of minds and conspiracy theories with a cross-divisional marketing campaign on the radio, on TV, and in print.</p> <p>In addition, a variety of organizational measures were continued to safeguard editorial and artistic independence in the editorial and creative departments. The main focus here is compliance with the “Editor-in-Chief Principle,” duties of care, protection of personality rights, a clear separation of advertising and editorial content, and dealing with the representation of violence and the protection of minors. Such topics are also part of Bertelsmann’s in-house training for editors. Further examples of measures and projects in the corporate divisions can be found on the Bertelsmann Website.</p>	
	<p>Case: Guaranteeing the safety and health of journalists</p> <p>Example: RTL Group</p> <p>RTL Deutschland has developed various measures to ensure the safety and health of journalists, including a checklist that journalists can use as a guide to minimize the risk of violence and aggression, e.g., in the context of demonstrations. When preparing for filming, it is recommended that journalists check the specific situation at the location in advance and consider whether specific security precautions involving police and/or security escorts are necessary. In such cases, RTL Deutschland provides security personnel to ensure the safety and health of its journalists. As a general rule, it is recommended that journalists do not expose themselves to danger during filming and that they familiarize themselves in advance with possibilities for retreat and escape. If the police and/or security escorts order the journalists to stop their work, they should leave the filming location immediately regardless of the consequences for their reporting.</p> <p>Besides increasing violence during on-site operations, violence on the Internet, or cybercrime, against journalists has also increased. In this context, RTL Deutschland is part of the initiative “Verfolgen statt nur Löschen” (roughly: “Don’t just delete – Prosecute”), which aims to enable law enforcement in such incidents to send a clear signal against lawlessness and ruthlessness on the Internet. Hate comments against journalists, among others, are identified and carefully reviewed under criminal law so that prosecution can be initiated in the event of a violation of the law.</p> <p>In addition, RTL Deutschland offers journalists the option of psychological support, in particular if they are reporting from war or crisis zones. There, journalists can discuss the situation in the respective region with trained specialists before, during, and after crisis assignments and identify and reflect on possible (psychological) risks in advance and retrospectively. If journalists are increasingly working in war or crisis zones, RTL Deutschland offers mandatory crisis training for “war journalists” so that they are trained to deal with risks and dangers that may arise and can better assess them.</p>	I-II

GRI	Disclosure	UNGC
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MSD	Intellectual Property
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103	Management approach 2016 (including GRI 103-1, 103-2, 103-3)	I-II
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Bertelsmann's businesses also contain the development, creation, prefinancing, transfer, licensing, and sale of products and services that are protected as intellectual property. For Bertelsmann, the protection and safeguarding of intellectual property is of vital importance for the company's business success of its analog and digital business models. This is also set forth in the Bertelsmann Code of Conduct (see **GRI 102-16**): "We respect and protect all forms of intellectual property and protected content." For this reason, the company is committed to the highest possible level of copyright protection worldwide as well as to maintaining strong exclusive rights and freedom of contract. The "Taskforce Copyright," consisting of representatives from the relevant German content businesses (RTL Deutschland, Penguin Random House Verlagsgruppe, Gruner + Jahr, BMG, and UFA), monitors current developments and legislative processes on copyright at the EU and national level and develops joint Bertelsmann positions. In 2021, the focus of activities was placed on accompanying the process of transposing the EU Directive on Copyright in the Digital Single Market into German law.

GRI 413	Local Communities 2016
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103	Management approach 2016 (including GRI 103-1, 103-2, 103-3)	I
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Bertelsmann sees itself as part of society. Responsibility is deeply rooted in its corporate culture and hence in the day-to-day action of the Group, its corporate divisions, and companies. The Bertelsmann Essentials, which focus on the values of creativity and entrepreneurship, form the basis for this. According to the Essentials, Bertelsmann is mindful of its impact on society and the environment and seeks to make a positive difference. This includes also contribution of the Group's media, services, and education businesses and the expertise of its employees where help and support are needed outside the company.

As a media, services, and education company, Bertelsmann's activities are interwoven with societal developments worldwide. Society and workforce expect the company to fulfill its responsibility as a corporate citizen beyond its own businesses. Bertelsmann's social commitment, at the Group, divisional, and company level, encompass a wide range of measures and funding programs that involve and develop local communities. These efforts contribute to the business success by supporting the company's license to operate; that is, enhancing Bertelsmann's acceptance in the society.

Donations, sponsorship, funding for charitable projects, and memberships both at the Group and divisional level are an expression of responsible behavior and support Bertelsmann's role as a good corporate citizen worldwide. Carefully planned and professionally executed measures boost the company's reputation and anchor Bertelsmann as a responsible partner.

Bertelsmann seeks to contribute to the future-oriented development of its surroundings through donations, sponsorship, and funding for charitable projects, while at the same time safeguarding acceptance and a broad client base. The objective is to reach as many people as possible and to create a positive impact on society.

The Executive Board's Guideline on Donations, Sponsorships, and Memberships ensures that funding measures in the form of donations, sponsorship, and memberships comply with legal and fiscal requirements and are consistent with the company's strategy.

GRI	Disclosure	UNGC
	<p>In line with the principle of decentralization, the corporate divisions independently decide on their collaborations, funding for charitable projects, and donations, steered by the Executive Board Guideline and in coordination with Bertelsmann Corporate Communications. The Chairman and Chief Executive Officer decides on one-off donations and sponsorships exceeding €100,000 as well as regular commitments exceeding €50,000. All commitments must be reported annually to the Group Tax department, to ensure that the Executive Board can fulfill its related due diligence and compliance obligations. Group companies are also required to define and document their donation activities and sponsorship concepts and keep these documents for a period of five years. The general prerequisites of the Executive Board Guideline on Anti-corruption & Integrity are thus complied with. Any cases of doubt are to be coordinated and clarified with the Integrity & Compliance department.</p> <p>Based on the Executive Board Guideline on Donations, Sponsorships, and Memberships, Bertelsmann's focus areas for its corporate citizenship activities are as follows:</p> <ul style="list-style-type: none"> ▪ Education: particularly for socially disadvantaged groups and media-related issues (e.g., reading promotion, media literacy); ▪ Culture: particularly the promotion of cultural heritage and young talent in fields closely associated with Bertelsmann (e.g., literature, TV, movies); ▪ Academic research: particularly on topics closely associated with Bertelsmann, such as economic and social sciences as well as media and communications science; ▪ Freedom of creativity and media: particularly freedom of expression and press freedom, protection of intellectual property, content responsibility, and editorial independence; ▪ Networking activities with relevant stakeholders. 	
413-1	<p>Operations with local community engagement, impact assessments, and development programs</p> <p>As a good corporate citizen, Bertelsmann is in particular committed to sites where its companies operate, preferably funding organizations and initiatives in which Bertelsmann employees are actively involved. The company also supports humanitarian disaster relief efforts.</p> <p>Examples of the Corporate Center's donation and sponsorship measures are presented on the Bertelsmann Website. In 2021, Bertelsmann's corporate divisions also contributed to the battle against the coronavirus and its repercussions in a variety of ways.</p>	I
GRI 415	Public Policy 2016	
103	<p>Management approach 2016 (including GRI 103-1, 103-2, 103-3)</p> <p>Bertelsmann maintains an open dialog with stakeholders in politics, business, and civil society. Key objectives include respect for and protection of intellectual property, freedom and independence of the media, regulation of tech & data, and preservation of cultural and journalistic diversity.</p> <p>Bertelsmann's public affairs managers offer political decision-makers access to expert dialog partners within the Group, communicate the latest positions and facts, and provide helpful information. Joint positions are developed by in-house working groups and through association and other organizational memberships.</p>	

GRI	Disclosure	UNGC
	<p>In addition to functioning as a discussion forum and committee of experts, Bertelsmann's liaison offices in Brussels and Berlin and the divisional public affairs managers introduce policymakers to the Group's various business models in the fields of media, services, and education. Their activities include presenting Bertelsmann's digital businesses and the international media group's cultural activities. Bertelsmann SE & Co. KGaA is registered in the Transparency Register of the European Union and is a signatory to its Code of Conduct.</p>	
415-1	<p>Political contributions</p> <p>Bertelsmann does not donate to politicians, political parties, or organizations affiliated with parties. Similarly, the company does not support organizations and institutions whose fundamental views conflicts with liberal-democratic principles or which allow or imply discrimination against people.</p>	X
GRI 417	<p>Marketing and Labeling 2016</p>	
103	<p>Management approach 2016 (including GRI 103-1, 103-2, 103-3)</p> <p>In their creation and distribution of products and services as well as in their advertising activities and marketing communications, all Bertelsmann companies comply with legal provisions and the highest quality standards as a matter of course. The Bertelsmann Code of Conduct (see GRI 102-16) codifies this as a binding principle. Responsibility for the protection of media users and customers as well as compliance with related requirements, standards, and commitments, rests with the management of the individual companies. Bertelsmann and its companies use a variety of principles and procedures for product labeling, reflecting the diversity of their own products and services. Relevant fields in which labeling is used in particular include the protection of minors (see MSD "Content creation and dissemination") and environmental and climate protection (see GRI 300).</p> <p>Product safety is a focus topic that plays a special role in the production of children's books at Penguin Random House. The company adheres to the strictest safety standards in connection with the manufacturing of its books, toys, and related products to ensure that all Penguin Random House products are risk-assessed and safety-tested for things such as choking hazards or toxicity.</p>	I,VIII
417-1	<p>Requirements for product and service information and labeling</p> <p>See GRI 417 Management approach.</p>	
GRI 418	<p>Customer Privacy 2016</p>	
103	<p>Management approach 2016 (including GRI 103-1, 103-2, 103-3)</p> <p>In the creation and distribution of its media, services, and education offerings, Bertelsmann uses customer data. In particular in the services business, many of the largest corporations worldwide entrust the company with parts of their value chain, e.g., the management of logistics processes or customer communications. Careful and confidential handling of personal data also plays a decisive role in contact with media users.</p> <p>Protection of privacy is a fundamental human right. The objective of customer data protection is to protect people's right to determine who has what knowledge about them, and when. This also means that personal information or information that could identify a person must be handled in accordance with legal requirements and adequately protected against</p>	I-II

GRI	Disclosure	UNGC
	<p>unauthorized access and that data subjects are able to exercise their statutory data subject rights. There are various ways for data subjects to contact Bertelsmann, including via email inboxes set up specifically for this purpose. Bertelsmann attaches great importance to protecting customer data. This includes safeguarding the personal data of own company customers as well as personal data provided to Bertelsmann by its business partners regarding their customers. In addition to the legal requirements as well as the Bertelsmann Code of Conduct and Supplier Code of Conduct (see GRI 102-16), customer data protection within the company is governed by the Executive Board’s Information Technology and Information Security Policy, the Bertelsmann Cloud Policy, and for the German companies of the Bertelsmann Group by the Corporate Privacy Handbook as well.</p> <p>Bertelsmann operates in a highly regulated environment as pertains to handling customer data. In all the core markets, in which Bertelsmann operates, the protection of customer data is required by law and compliance with it is also part of company’s self-commitment. European legislators in particular are enforcing further data protection regulations against the background of Economy 4.0 and stipulate heavy fines for serious violations within the EU General Data Protection Regulation (GDPR).</p> <p>Responsibility for customer data protection is decentralized and rests with the management of the Group companies. To ensure compliance with data protection law governing customer data, subsidiaries use a Group-wide data protection management system that addresses in particular the implementation of the documentation and accountability obligations under GDPR. In addition, German subsidiaries have a data protection organization, consisting of central data protection officers and local data protection coordinators. The latter report to the local management as well as annually or upon request to the central data protection officers, who in turn report to the Executive Board annually or upon request. A similar organization exists at Group companies outside Germany. An Information Security Management System (ISMS) based on industry-standard ISO 27001 creates the technical and organizational framework for confidential data processing. The ISMS features a regular and structured survey of relevant processes and procedures to ensure compliance with statutory information security requirements, a systematic recording of risks, and the derivation and monitoring of related mitigation measures to minimize risk.</p>	
418-1	<p>Substantiated complaints concerning breaches of customer privacy and losses of customer data</p> <p>In the twelve-month period from 11/01/2020 to 10/30/2021, there were 96 formal requests from data protection authorities (previous year: 116). No fines were imposed. As of October, 30, 2021, 83,187 employees (previous year: 77,444 employees) were trained in matters related to GDPR.</p>	I-II
<p>MSD Content Creation and Dissemination</p>		
103	<p>Management approach 2016 (including GRI 103-1, 103-2, 103-3)</p> <p>Media is an integral and indispensable part of the democratic social order – they are an economic and a cultural asset at the same time. Media report and entertain, clarify, show connections, and form the basis for freedom of information as well as formation and diversity of opinions in society. Bertelsmann takes the social responsibility that this implies seriously: for its business and journalistic activities as well as the creation and distribution of content and formats worldwide. In providing outsourcing, print, and education services, the company gives high priority to professionalism and customer focus, service quality, and the protection of personal information.</p>	I-II

GRI	Disclosure	UNGC
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The Bertelsmann Essentials anchor creativity and entrepreneurship as important guiding principles in the creation and distribution of media and services. In addition, the Bertelsmann Code of Conduct (see [GRI 102-16](#)) specifies key principles for the responsible creation and distribution of media and services that are consistent and binding for all Bertelsmann companies. Compliance with legal requirements and the highest quality standards is a matter of course for Bertelsmann and is fundamental to the business success.

Content responsibility at Bertelsmann means reflecting on the repercussions of the content creation and distribution so as to protect the rights and interests of media users, customers, and third parties in the best possible way. Overriding principles and guidelines of media ethics are set by national and international laws governing the press, broadcasting, and multimedia. They are complemented by voluntary commitments to external guidelines, such as the ethics codes of national press councils, and within the company by the Bertelsmann Code of Conduct. Bertelsmann's editorial and creative staff are committed to, among other things, "respecting privacy and to the responsible treatment of information, opinion, and images." As a result, the company expects careful research, high-quality reporting, and transparency in case of errors – because thorough journalistic work is more important than ever in the face of online disinformation ("fake news"). Cross-divisional verification teams provide their expertise in discerning between authentic and manipulated photos and videos, or those taken out of context.

In addition, content responsibility is anchored in various ways in the corporate divisions, companies, and editorial departments. In accordance with the "Editor-in-Chief Principle" practiced at Bertelsmann, responsibility for the creation and distribution of media content lies solely with the content managers in the companies' editorial teams and creative departments, who are free from influence from the Group's owners or local management. The representation of social diversity as well as regulations to avoid discriminating or stereotyping content and "fake news" also play an important role.

In 2021, the company defined strategic objectives relating to content responsibility as part of the Bertelsmann CR Program (2021–2023). These include expanding coverage of socio-political topics, ensuring complete protection of minors in streaming services and digital offering, developing guidelines for publishing content, and a commitment to fairness and transparency in the music industry. In addition, cross-industry partnerships on social issues with artists were expanded.

On the level of measures, RTL launched its "Klima Update" ("Climate Update") program, which examines the topic in all its various facets. In addition, the news channel "ntv" covered the UN Climate Change Conference with a series titled "Wie schaffen wir Klimawandel?" ("How can we manage climate change?"), with on-location reporting and an extensive schedule of special programs. The Gruner + Jahr magazine "Geo" is increasingly anchoring sustainability in its core business and is adapting operations and work processes accordingly. Among other topics, "Geo" covered all aspects of climate and species protection, as well as future technologies, in its "Nature and Sustainability" section and it also launched "Wer wird Visionär:in?" ("Who wants to be a visionary?"), a podcast casting show searching for Germany's best sustainable ideas. Under the umbrella of the Bertelsmann Content Alliance and under the heading "Damit es auch morgen noch läuft" ("Making sure things will still work tomorrow"), RTL Deutschland, UFA, RTL Radio Deutschland, the Penguin Random House Verlagsgruppe, and Gruner + Jahr put the spotlight on water as a resource as part of the "Packen wir's an" ("Let's get to grips with it") themed week launched in October 2021. Further examples of measures and projects in the corporate divisions can be found on the [Bertelsmann Website](#).

GRI	Disclosure	UNGC
	<p>The company shoulders a special responsibility when creating and distributing content for children and adolescents who experience their living environment as digital natives. The media policies and laws to protect minors from harmful media serve to examine media content to determine whether it could impair the development of children or adolescents. If such an effect is suspected, various restrictions come into force. The intent is to ensure that such media content is only accessible to age groups with the necessary maturity to put the possibly disturbing or unsettling content into context and process it appropriately. Bertelsmann gives high priority to the protection of children and adolescents in the creation and distribution of its creative content and complies with the relevant requirements. These include broadcast time restrictions as well as content and product labeling. The corporate divisions and companies go partly beyond existing regulations at the EU and national level, particularly in broadcasting (e.g., the Audio Visual Media Services Directive). In addition, Bertelsmann companies are continuously active in child and youth media protection organizations.</p>	
	<p>Case: Dissemination and accessibility of content Example: RTL Group</p>	I-II
	<p>In addition to local laws and voluntary commitments, RTL Group editors align their work to the RTL Group Newsroom Guidelines. The Guidelines describe editorial duties of care and include rules on the protection of minors, balanced reporting, the protection of personal rights, and representation of violence. In 2017, the RTL Group Newsroom Guidelines were updated in the fields of personality rights and the careful handling of references (in particular social media), and a clear separation of advertising and editorial content. This update was partly driven by the issue of online disinformation. To prevent the spread of such disinformation, RTL Deutschland had set up an in-house team of experts to verify user-generated content back in 2016. This verification unit has since been expanded internationally into a Group-wide team of journalists and information specialists. In addition, RTL Group has established further processes to ensure compliance with ethical standards. At Groupe M6, in accordance with the French law on strengthening media freedom, independence and diversity of content, ethical standards are monitored and analyzed by an Ethics Committee. A similar committee has been set up at RTL Luxembourg. In Germany, RTL Deutschland also appointed a Media Advisory Council. Comprised of representatives from politics, culture, business, and religious organizations, this council advises RTL Deutschland's management with special attention to diversity of opinion and plurality of channels and products.</p> <p>At RTL Deutschland, the Standards & Practices department advises the editorial teams on matters related to the protection of minors. It ensures compliance with legal requirements and serves as the contact point for viewers and regulatory bodies. RTL Deutschland's channels teamed up with other commercial program providers in 1993 to establish the Self-Regulation Body of the Television Industry ("Freiwillige Selbstkontrolle Fernsehen e.V.," FSF). The channels' youth protection officers proactively submit youth protection-relevant programs to the FSF's independent review groups prior to broadcast. The FSF reviews programs for suitability for minors and makes a binding decision as to whether and at what time a program may be broadcast. RTL Deutschland is also a member of Voluntary Self-Regulation Multimedia ("Freiwillige Selbstkontrolle Multimedia e.V.," FSM), an association that supports compliance with legal requirements and the further development and review of technical solutions for the protection of minors. In addition, RTL Deutschland is a member of "JusProg e.V.," a free filtering software that provides safe surfing spaces by protecting children from content on the Internet that is not age-appropriate. "JusProg e.V." supports the EU initiative "euCONSENT" as its German representative and German consortium member.</p>	

GRI	Disclosure	UNGC
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The EU Commission has commissioned “euCONSENT” to develop a European age verification network to better protect children and adolescents on the Internet.

RTL Nederland is affiliated with “NICAM,” a Dutch institute responsible for the development and implementation of the “[Kijkwijzer](#).” This classification system warns parents and educators if a TV program or film has content unsuitable for specific age groups. In France, as early as 1989, the channels of Groupe M6, part of RTL Group, developed a voluntary labeling system for their broadcasted films – a system adopted and made obligatory in 1996 for other French broadcasters by the French media regulator “ARCOM” (“l’Autorité de régulation de la communication audiovisuelle et numérique,” formerly “Conseil supérieur de l’audiovisuel”).

MSD Media Literacy

103 Management approach 2016 (including GRI 103-1, 103-2, 103-3)

I-II

As a key skill of our time, media literacy has major implications for the education and development opportunities of children, adolescents, and adults as well as their maturity in an increasingly digital living environment. By promoting relevant measures, particularly in the field of reading literacy, Bertelsmann makes an important contribution to societal and individual development.

Bertelsmann and its corporate divisions are involved in many ways in initiatives to promote media and digital literacy among children and adolescents. For example, Bertelsmann itself, Gruner + Jahr, Penguin Random House Verlagsgruppe, and RTL Deutschland support “Stiftung Lesen,” a Germany-wide initiative to promote reading among children and adolescents, e.g., through book donations and reading-aloud days.

In addition, online media literacy is a particular focus of efforts. RTL Group was a founding member of the EU initiative “CEO Coalition to make the internet a better place for kids,” which develops specific recommendations for dealing with digital media. These efforts are being continued in the “Alliance to better protect minors online,” established in 2017, in which Super RTL and RTL Deutschland participate. The EU initiative “[klicksafe](#),” sponsored by Super RTL, works to promote public awareness of safe Internet use through practical offerings and information materials. The TV channel also supports the online search engine “[fragFINN](#),” which lets children between the ages of six and twelve research topics that interest them on safe, child-friendly websites. The Penguin Random House publisher DK offers a similar platform with “[DKfindout!](#)” Children and adolescents are increasingly using Bertelsmann’s offerings online on smartphones, tablets, and PCs. Therefore, the continuous development of technical solutions to protect minors for every platform is crucial. Further examples of measures and projects in the corporate divisions can be found on the [Bertelsmann Website](#).

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