

Bertelsmann
Diversity, Equity
& Inclusion Policy

Preamble

Every day, all over the world, our employees are committed to the success and continued development of Bertelsmann. They are the key to our Creativity & Entrepreneurship. That's why taking care of our employees and fostering diversity is a top priority for Bertelsmann. Our goal is to create an inclusive working environment for everyone in the company, based on engagement, collaboration, and appreciation. This intent is firmly anchored in our corporate values and culture.

As a media, services and education company, we recognize our responsibility to build equity within our workforce and content as well as our business activities. We strive to effect meaningful change in our company as well as in the communities in which we operate.

This Diversity, Equity & Inclusion (DEI) Policy expresses the common understanding of DEI at Bertelsmann SE & Co. KGaA, Bertelsmann Management SE, and all companies controlled by Bertelsmann SE & Co. KGaA. It is subject to continuous critical review, revision, and improvement.

Our Position on Diversity, Equity & Inclusion

At Bertelsmann, the diversity of our workforce is a prerequisite for innovation and sustainable corporate prosperity. We want to further increase diversity among our employees at all levels to reflect the diverse societies we live in. Fostering a culture of respect and belonging that ensures equity for all and values employees for their diverse backgrounds, perspectives and talents makes us a more inclusive organization. We want to empower our employees to be their authentic selves at work and create a safe environment where they can voice their ideas, opinions, and criticisms openly and challenge convention, taking into account their individual needs.

A non-discriminatory environment is the basis for Diversity, Equity & Inclusion

We promote an inclusive and fair work environment characterized by integrity, tolerance, trust and mutual respect that recognizes the unique value and dignity of every individual. We do not allow discrimination on the basis of race, national or ethnic origin, gender, gender identity or gender expression, sexual orientation, pregnancy, marital or parental status, caring responsibilities, age, disability, religion or belief, social background, education, working time arrangements, or any other characteristic specified under applicable anti-discrimination law or company policy. Racism, sexual harassment, bullying or mobbing, abuse of power, intimidation, threats or any other form of harassment are not tolerated. To ensure these principles, we are continuously examining our internal processes, policies, and workplace culture to make positive changes in the Bertelsmann organization globally. All decisions, for example regarding recruitment, promotion, remuneration, disciplinary measures, or selection of business partners, are to be made unbiased and without prejudice.

These convictions are embedded in the Bertelsmann Code of Conduct and are also demanded from our business partners in the Bertelsmann Supplier Code of Conduct. In terms of external guidelines, Bertelsmann is committed to the principles of the Universal Declaration of Human Rights, the United Nation's Guiding Principles on Business and Human Rights, and the International Labor Organization core labor standards.

Responsibility for Diversity, Equity & Inclusion

Systemic change begins at the top, and strategic responsibility for diversity within the Group lies with the Executive Board. While business and HR leaders are responsible for increasing diversity and fostering equity through their function as role models, we expect all employees to contribute to creating an inclusive working environment. The Executive Board and Group Management Committee assess the status of DEI and initiate appropriate actions if needed. Furthermore, progress is being monitored by the Bertelsmann Management Representative Committee, employee representatives, and other stakeholders and bodies at the various levels within the Group. An international DEI working group comprised of divisional and Corporate representatives also supports the introduction of measures strengthening DEI in both HR processes and our corporate culture.

All these efforts are supported by the Corporate Responsibility Department. In case of any questions or comments, please reach out to diversity@bertelsmann.com for support.

Contact partner in the event of violations

The Bertelsmann Code of Conduct encourages our employees to speak up freely and without fear of retaliation. Employees can always reach out to the Bertelsmann Integrity & Compliance Department. All concerns will be handled with the greatest possible regard for confidentiality and in compliance with all applicable data protection requirements. All reports of suspected compliance violations will be investigated. Please reach out to integrity@bertelsmann.com for support.

Bertelsmann's local employee representative bodies are also available to employees as contact partners.

In addition, the ombudsperson is available to everyone. The ombudsperson is a neutral and independent contact person for inquirers seeking guidance and support in raising and resolving any suspected substantial violations against the Code of Conduct. The ombudsperson holds all communications with those seeking assistance in strict confidence and does not disclose any content of the communications or the identity of the inquirer, unless given explicit permission to do so by the inquirer. Please reach out to ombuds@discussconcerns.com for support.

Moreover, an online platform is available to our employees for reporting material violations of the Code of Conduct (www.reportconcerns.com). This system, secured by special encryption, is available in several languages and allows a confidential dialogue with the Bertelsmann Integrity & Compliance Department.

This Diversity, Equity & Inclusion Policy of the Board of Directors is effective as of 29 April 2021.