

Human Rights and Fair Working Conditions

Our Policy

Preface

Dear Bertelsmann employees and stakeholders,

At Bertelsmann, responsible conduct forms an integral part of corporate governance. Our responsibility is embodied in our core values, the Bertelsmann Essentials: “We take responsibility in society and for our environment - with the goal of creating a better future.”

As a globally active media, services and education company, we want to make a positive contribution to the major social and ecological developments of our time. We are convinced that this is reflected to a significant extent in respectful and dignified dealings with one another - among employees as well as with all those who are associated with the company in other ways.

While the Bertelsmann Essentials reflect our core values, global conventions on human rights and fair working conditions provide the binding framework for our actions. On this basis, Bertelsmann, as a value-oriented employer, sets a high standard for itself with this policy. We want to do what’s right and not merely comply with legal requirements, which, after all, is something that goes without saying.

Even though different and sometimes conflicting interests may arise between stakeholders when it comes to determining working conditions, we are convinced that only the balanced reconciliation of these interests can create a partnership based on fairness, and only such a partnership can ensure our joint business success.

The comprehensive fulfillment of all requirements, principles and standards relating to human rights and fair working conditions remains an ambitious challenge that we are committed to meeting. Additionally, we expect universal human rights to be respected without any restrictions not only in our Group companies, but also by our business partners and along our supply chains.

We strive to continuously improve. Everyone at Bertelsmann - the Executive Board, managers and employees - has a responsibility to put this commitment into practice each and every day. Thank you for your contribution.

The Bertelsmann Executive Board



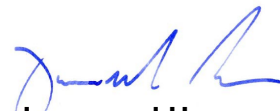
Thomas Rabe

Chairman and Chief Executive
Officer of Bertelsmann



Rolf Hellermann

Chief Financial Officer
of Bertelsmann



Immanuel Hermreck

Chief Human Resources Officer
of Bertelsmann

The Bertelsmann Essentials

“We invest in our employees, empower them so that they are able to make business decisions autonomously and provide a fair and healthy work environment.”

Respect and trust towards and between all employees form the basis of this commitment enshrined in the Bertelsmann Essentials. This policy shapes our corporate culture, which encourages participation and partnership and promotes our creativity and entrepreneurship essentials.

Applicable rules, regulations and conventions

While the Bertelsmann Essentials reflect our core values and convictions, global conventions on human rights and working conditions provide the binding framework for our actions. These are:

- The United Nations Guiding Principles on Business and Human Rights
- The UN Free & Equal Standards
- The UN Global Compact
- The ILO Core Labour Standards, and
- The OECD Guidelines for Multinational Enterprises.

Our Bertelsmann Code of Conduct also sets out further requirements that we as an organisation and all our employees are committed to observing. The standards defined in the Bertelsmann Supplier Code of Conduct are binding for our business partners.

Our aspirations

As a value-driven and responsible employer, Bertelsmann sets itself further high standards derived from the Bertelsmann Essentials going beyond the binding framework mentioned above. In doing so, we are additionally guided by:

- The United Nations Universal Declaration of Human Rights (UN)
- The International Covenant on Economic, Social and Cultural Rights (UN Social Covenant)
- The Charter of Fundamental Rights of the European Union
- The European Social Charter (1996) and
- The European Convention for the Protection of Human Rights and Fundamental Freedoms

Bertelsmann sees fair working conditions as providing the foundations for its business activities and corporate responsibility. Even though different and sometimes conflicting interests may arise when it comes to determining working conditions, we are convinced that only a balanced reconciliation of these interests can give rise to a partnership based on fairness. Working together in a spirit of fairness is crucial for a sustainable and successful future for Bertelsmann and for everyone working at Bertelsmann.

Basics of working together

On the basis of our participation- and partnership-driven culture, employees, their representatives and managers work together for the common good and, thus, for the good of Bertelsmann.

Respect and trust

Bertelsmann as an employer, its managers and all employees treat each other with respect. The goal is to create a healthy and safe work environment based on mutual trust and respect that recognises the dignity of all employees and the value of each individual.

Open dialogue

For Bertelsmann, ongoing dialogue with our employees and their representatives forms an essential element of the way we work together. This makes it possible to create trust, identify potential for improvement and derive appropriate measures.

Our employees participate in shaping their working conditions through regular employee reviews (e.g. performance and development reviews or team discussions) and through the Bertelsmann employee surveys.

Freedom of association and collective bargaining

Bertelsmann respects the freedom of association and upholds the effective recognition of the right to collective bargaining.

Protection of employee representatives

Elected or appointed employee representatives are not interfered with or obstructed in the performance of their duties. They must not be placed at any disadvantage in terms of their remuneration or career development.

Respect for human and personal rights

We work together in a spirit of partnership embracing full respect for the human and personal rights of all our employees.

UN Global Compact

Bertelsmann is a signatory to the UN Global Compact. We are expressly committed to upholding its principles and see them as providing the binding framework for our actions.

Right to equal treatment and non-discrimination

Bertelsmann treats all employees equally, without distinction and free of prejudice or any form of discrimination in accordance with the UN Universal Declaration of Human Rights. Employees' individual needs are taken into account in order to eliminate any disadvantages as far as possible.

This applies to new recruiting as well as current employment contracts, e.g. in the case of promotions. This is done without regard to ethnic origin, skin colour, age, sex, gender identity or expression, sexual orientation, pregnancy, parental or marital status, disability, language, religion or belief, political or other convictions, national or social origin, wealth, birth or other status. We follow the UN Standards of Conduct to Combat LGBTIQ Discrimination.

Discrimination, racism, anti-semitism, religious intolerance, sexism,, bullying, abuse of power, intimidation, threats or any other form of coercion are not tolerated.

Freedom of expression

Bertelsmann protects the right to freedom of expression and sees it as an essential element of working together in a spirit of partnership. We offer a safe environment in which employees can voice their ideas, opinions and criticism and challenge conventions without fear of any recriminations.

Right to learn

Bertelsmann wants to empower its employees at all levels so that they can adapt to the challenges of the new working world, especially the digital transformation, to continuously learn from and with each other and to acquire the skills that are critical for success.

No human trafficking and modern slavery

All forms of modern slavery and human trafficking, as well as all types of exploitation, are prohibited at Bertelsmann.

No forced or compulsory labour

For us, it goes without saying that no one is forced to work. No one is restricted in their right to freely choose their employer. Within the bounds of their legal and contractual obligations, all employees are therefore free to leave their jobs for personal reasons and take up new employment outside Bertelsmann.

No child labor

In accordance with the ILO Core Labour Standards, child labor is prohibited at Bertelsmann.

Fair payment

For us, fair payment is a crucial expression of fair working conditions. Fairness is not only reflected in the amount of remuneration received. It is equally important to us for the mechanisms used for determining specific remuneration to be non-discriminatory, transparent and readily comprehensible.

Market orientation and transparency

At Bertelsmann, remuneration is based on clearly defined criteria and processes. Our remuneration systems are market-oriented, non-discriminatory, transparent and readily

comprehensible. In this way, they offer fair and appropriate remuneration for our employees' contributions to Bertelsmann's success.

Individual salary determination

Individual salary determination within the scope of the applicable remuneration system is oriented to employees' functions, their resultant responsibility and their performance and experience. Aspects that are outside these criteria, such as gender, age, origin or personal relationships, do not play any role in salary determination.

Equal pay

It is a basic principle at Bertelsmann that our employees should receive equal pay for the same work or for work of equal value irrespective of their gender or any other characteristics not related to work performance. If there are discriminatory pay gaps in this regard, we will eliminate them.

Minimum wages

Our salaries comply with or exceed the legal requirements, particularly minimum wage legislation, and are paid when due.

In addition, we aim to ensure that the salary for a full-time position is at least sufficient to meet the basic needs of our employees and to guarantee decent living conditions.

Fair working hours and working (time) models

Bertelsmann's work culture is driven by results rather than by presence. In an atmosphere based on mutual trust, we create underlying conditions to support our employees in balancing their professional and personal obligations. Flexible working time arrangements also aim to promote the health and well-being of our employees and thus maintain their ability to perform.

Expectations

Our employees should be able to complete the tasks assigned to them within their standard working hours. Where an excessive amount of overtime arises, managers take appropriate action to reduce the workloads of the employees concerned.

Flexibility

Provided that this does not conflict with operational processes, Bertelsmann uses flexible working and part-time models to support employees in balancing professional and personal obligations. In this connection, we favour models such as mobile working or working from home that allow employees to perform their duties even when they are away from the workplace.

Accordingly, we pay particular attention to the challenges facing our employees resulting from a specific stage of their lives,

e.g. child care or the need to care for relatives who are unable to look after themselves, as well as challenges due to illness or disability.

Job security

Bertelsmann attaches high importance to job security. Creating and maintaining good and secure jobs is one of the objectives of our corporate activities. Accordingly, further education for employees is of paramount importance in order to prepare them for the developments and requirements emerging in a rapidly changing working world. However, if adjustments to staff numbers cannot be avoided, Bertelsmann is aware of its social responsibility toward the employees concerned and takes this responsibility seriously.

Preventive measures

Bertelsmann examines measures in advance for avoiding or minimising staff adjustments as far as possible and takes appropriate steps.

Last resort

Laying off employees is generally not a suitable measure for responding to temporary economic and seasonal fluctuations. For us, it is the last resort in reacting to structural challenges or surplus capacity.

Social responsibility

If it is necessary to adjust staff numbers, Bertelsmann will implement the necessary steps in a socially responsible manner and free of any discrimination. This also includes informing the employees concerned in good time and exploring internal options for new or continued employment. At the same time, Bertelsmann offers training and support with the search for new employment to improve the opportunities of all those affected in the internal and external labour market.

Health, Safety & Well-being

Working conditions have a major impact on our employees' health, safety and well-being.

Policy

In line with this goal, the Bertelsmann Executive Board will adopt a Health, Safety & Well-being Policy.

Inclusion

The Bertelsmann Essentials state that diversity and variety among employees are decisive for creativity. The goal is to foster diversity and variety across the Group at all levels, where legally permitted. Bertelsmann aims to create a working environment based on fairness and

participation as well as mutual understanding and appreciation that takes into account the individual needs of employees.

Policy In pursuit of this goal, the Bertelsmann Executive Board will adopt a policy related to inclusion.

Respect for the right to privacy and protection of personal data

New technologies and the digital transformation are changing the way we work. As a modern and forward-looking company, Bertelsmann has a positive attitude toward this issue. However, the digital transformation and new technologies must always be seen in the light of the legitimate interests of our employees and customers.

High standards We ensure that the privacy and personal data of our employees and customers are protected.

To this end, Bertelsmann complies with high data protection standards and avoids impacts on privacy.

Freelancers and temporary workers

Bertelsmann considers permanent employment contracts for its employees to be the standard to strive for. However, we are also committed to the fair treatment of the people who work for Bertelsmann in other forms.

Relationship to core workforce The use of external staff on a permanent basis runs counter to our goal of providing good secure jobs for employees and retaining expertise within the company.

Adhoc use The use of temporary and alternative employment models (e.g. temporary and on-call contracts or freelancers) should therefore be confined to situations in which this is necessary due to special business requirements (e.g. flexibility reserve, temporary needs, creative or specialised skills).

Respect and dignity All people working for Bertelsmann are treated with respect and dignity regardless of their contractual status.

Remuneration External staff are remunerated at standard market rates in accordance with statutory requirements.

Respect for human rights in our supply chains

Bertelsmann is aware that its responsibility for human rights extends beyond its own business activities. The Bertelsmann Supplier Code of Conduct imposes on our business partners an undertaking to observe the human rights of their employees.

Protecting human rights

We set standards that our suppliers and their respective networks must meet in terms of fair working conditions, including the avoidance of modern slavery along the supply chain, human rights and non-discrimination. This includes safeguarding health and safety at work, prohibiting child and forced labor, affirming the right to freedom of association and collective bargaining and prohibiting discrimination and coercion.

Supplier Code of Conduct

Our suppliers must comply with all applicable laws and regulations, industry standards, agreements and guidelines and, where appropriate, implement policies and management practices that promote respect for human rights along their own supply chain. The Bertelsmann Supplier Code of Conduct forms an integral part of our contracts with our suppliers and must be observed by them.

Implementation of our policy

As an internationally active company, we want to conduct our business on the basis of the above policy on fair working conditions and implement these comprehensively in all parts of the company and in all countries.

In doing so, we set high standards for ourselves. For this reason, we maintain a regular dialogue with our business units and the relevant stakeholders, discussing with them the progress made and the related challenges and publicly announcing the measures and solutions implemented. Wherever full implementation of our policy requires more time or effort or is rendered complicated by specific national values or the local legal framework, we work together to find solutions. Bertelsmann's Chief Human Resources Officer initiates the dialogue with the division HR managers and is responsible for implementing this policy. The divisions in turn report to the Bertelsmann Executive Board on the status of implementation.

The policy applies to Bertelsmann SE & Co. KGaA as well as Bertelsmann Management SE and all companies controlled by them (Group companies). Group companies to which this policy is not already directly applicable due to existing corporate governance rules (e.g. Majorel and RTL Group) implement their own equivalent policies based on this policy. Other companies that are not controlled by Bertelsmann are recommended to comply with these principles.

As the understanding of fair working conditions is constantly evolving, our policy is regularly reviewed every two years.

(Last revised: March 2023)