

# Bertelsmann Policy Inclusion

# BERTELSMANN POLICY

## Inclusion

### Preamble

As an international media, services, and education company, Bertelsmann views diversity as crucial for creativity and business success. This belief is embedded in our core values, the Bertelsmann Essentials.

As an employer, we are committed to ensuring a respectful and non-discriminatory working environment where every employee feels valued.

This Bertelsmann Policy Inclusion expresses the shared understanding of Inclusion at Bertelsmann.

### Our position on Inclusion

At Bertelsmann, Inclusion means creating a workplace of trust and psychological safety where all employees can contribute their perspectives and experiences and realize their potential to help drive the company's success.

Our goal is to strengthen a corporate culture that thrives on this variety of perspectives and is characterized by appreciation and collaboration. This includes a working environment that enables professional as well as personal development.

This is grounded in a culture of openness, participation, mutual respect, and recognition – built on the shared commitment of both executives and employees to uphold and strengthen these values every day.

As a result, all of this leads to greater employee satisfaction, commitment, and creativity, and unlocks new potential.

This position is deeply rooted in our values and corporate culture.

### Group-wide advancement of Inclusion

In this context, we are guided by the following principles:

#### **Promoting diverse perspectives**

Openness, trust, psychological safety, and a shared sense of purpose foster diverse perspectives and creativity within the organization. The results of our work – content, products, and services – will be better if we take different perspectives into account during their development. Therefore, we take measures to promote, better understand, and incorporate different viewpoints. Additionally, we support employee-driven initiatives that promote Inclusion.

### **Fostering Inclusion in Team Culture**

An inclusive team culture is reflected in how people interact in their everyday work across the company.

Executives and managers play a vital role in creating a working environment where all employees are respected and heard, and feel empowered to contribute. This is why we promote and demand fair, appreciative, and responsible leadership practices that strengthen participation and encourage diverse perspectives. At the same time, all employees are called upon to contribute to shaping a collaborative culture through openness, appreciation, and mutual support.

Through a variety of initiatives, we empower both managers and employees to make Inclusion visible and tangible in their daily workplace experience.

### **Integrating Inclusion into HR processes**

Our goal is to cultivate a corporate culture of opportunity for all – one in which individual potential is recognized and both professional and personal development are supported. To achieve this, we will regularly review HR processes and make improvements as needed. Targeted initiatives support managers and HR professionals in actively taking on their roles and responsibilities in shaping the corporate culture.

### **Intensifying exchange and networking**

We actively encourage and support networking and cross-divisional collaboration on Inclusion within our organization in order to facilitate the exchange of knowledge and experiences among executives, managers, and employees. Moreover, we engage in dialogue with external experts and cooperate with various third-party networks and initiatives.

### **Discrimination and harassment are not tolerated**

We do not allow any form of discrimination based on ethnic, national, or social origin, race, age, sex, gender identity or expression, sexual orientation, pregnancy, marital or parental status, disability, religion or belief, political or other opinions, or any other grounds that are legally protected. Racism, religious intolerance, antisemitism, sexism, sexual harassment, discrimination against LGBTQIA+ individuals, bullying, abuse of power, intimidation, threats, and any other types of harassment are not tolerated. All decisions, such as those related to recruitment, hiring, promotions, remuneration, disciplinary actions, or the selection of business partners, must be made impartially and without bias.

These convictions are embedded in the Bertelsmann Code of Conduct and are also demanded of our business partners through the Bertelsmann Supplier Code of Conduct.

Furthermore, the Bertelsmann Policy on Human Rights and Fair Working Conditions, the Bertelsmann Creativity Principles, as well as the Bertelsmann Leadership Principles serve as guidance for executives, managers and employees.

## Organizational Structure of Inclusion at Bertelsmann

Change begins at the top, and the responsibility for Inclusion at Bertelsmann lies with the Executive Board. As the highest management body, it defines Group-wide priorities and targets for Inclusion within the Bertelsmann CR program and receives regular updates on progress made.

The Bertelsmann Corporate Responsibility Council, which is chaired by the Chief Human Resources Officer (CHRO), is a cross-divisional body that advises the Executive Board on the strategic development of Inclusion management. In addition, progress is monitored and supported by the Group Management Committee, the HR Committee, the Bertelsmann Management Representative Committee, employee representatives and other stakeholders at various levels of the Group.

In line with Bertelsmann's corporate structure, the divisions and Group companies bear operational responsibility for implementing Inclusion locally. Executives and HR departments carry a special responsibility – both as role models and as key actors in shaping Inclusion-relevant processes and measures. Alongside this, we expect all employees to actively contribute to a respectful and non-discriminatory work environment where everyone feels valued.

The international Bertelsmann Inclusion Working Group with representatives from the divisions and Corporate ensures Group-wide networking, the exchange of information and collaboration on Inclusion at Bertelsmann. The working group's main task is to promote Inclusion management across the Group and embed Inclusion in relevant processes. The Bertelsmann Inclusion Working Group is managed by the Corporate Responsibility department.

## Points of contact in case of violations

The Bertelsmann Code of Conduct encourages our employees to speak up openly without fear of negative consequences. Retaliation against employees who report discrimination or harassment will not be tolerated.

In addition to local contact persons (e.g. supervisors, the HR department or, if available, the local employee representative), the Bertelsmann Integrity & Compliance department ([integrity@bertelsmann.com](mailto:integrity@bertelsmann.com)), the SpeakUp System ([www.reportconcerns.com](http://www.reportconcerns.com)) or the ombudspersons ([ombuds@discussconcerns.com](mailto:ombuds@discussconcerns.com)) are also available.

Further information on these contacts can be found in the Code of Conduct or at [www.integrity.bertelsmann.com](http://www.integrity.bertelsmann.com).

## About this policy

The Bertelsmann Inclusion Policy applies to Bertelsmann SE & Co. KGaA, Bertelsmann Management SE and all companies in which they have a controlling interest (Group companies). Group companies, to which this policy does not apply directly as a result of the existing governance regulations (i.e., RTL Group), are implementing their own equivalent policies based on this policy. Compliance with this guideline shall be recommended for companies which are not controlled by Bertelsmann.

*The Bertelsmann Inclusion Policy of the Executive Board was adopted on February 26, 2026. This policy is reviewed every two years. If you have any questions or comments, please contact [inclusion@bertelsmann.com](mailto:inclusion@bertelsmann.com).*