

Slavery and Human Trafficking Statement 2025

This statement outlines the measures Bertelsmann has taken to prevent forms of modern slavery and human trafficking for the 2025 fiscal year.

It fulfills Bertelsmann's obligations under Section 54 (1) of the UK Modern Slavery Act and Section 11 (1) of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. This statement covers the measures taken by Bertelsmann SE & Co. KGaA and Bertelsmann Group companies.

Where Bertelsmann Group companies have taken further measures that are subject to reporting duties under the UK Modern Slavery Act, these will be set out in a separate statement by the Group company and will be available on the respective Group company's website:

Penguin Random House
[Modern Slavery Statement](#)

BMG
[Modern Slavery Statement](#)

Arvato
[Modern Slavery Statement](#)

Fremantle
[Slavery and Human Trafficking Statement](#)

DK
[Modern Slavery Statement](#)

Further, for the purposes of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, this statement covers the following reporting entity: Penguin Random House Canada Limited (PRH Canada). For more detailed information about PRH Canada, please refer to PRH Canada's own Statement published on its website pursuant to this legislation.

Bertelsmann

Bertelsmann is a media, services, and education company with more than 75,000 employees that operates in some 50 countries around the world.

It includes the entertainment group RTL Group, the trade book publisher Penguin Random House, the music company BMG, the service provider Arvato Group, Bertelsmann Marketing Services, the Bertelsmann Education Group and Bertelsmann Investments. The company generated revenues of €19.0 billion in the 2025 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.

Strategy

Bertelsmann is focused on achieving profitable growth and an increasingly digital, international and diversified business portfolio. The Group's strategy is guided by five strategic growth priorities: National Media Champions, Global Content, Global Services, Education and Investments. At the beginning of 2024, Bertelsmann expanded its Group strategy and has since been driving growth through two key programs. The first program, "Boost," was initiated in 2021 with the goal of accelerating growth momentum.

Since 2021, €5.4 billion has been invested, with €1.8 billion allocated in 2024 alone. A total of approximately €8 billion is to be invested by the end of 2026.

The second program, “Boost+,” encompasses three key thrusts: “Next,” “Regional Boost” and “Breakout.” “Next” focuses on the development of new lines of business with a projected long-term sales potential of approximately €1 billion. “Regional Boost” targets the expansion of business in particularly promising regions. Finally, “Breakout” involves larger-scale mergers of existing businesses with other companies.

Employees

At the end of the 2025 financial year, the Group had 76,965 employees worldwide.

Protecting human rights and preventing forms of modern slavery and forced labor at Bertelsmann

Through its [Code of Conduct](#) and its voluntary commitment to external guidelines, Bertelsmann is committed to respecting and protecting human rights within the company and in its business relationships. The goal is to minimize the risk of human rights violations and discrimination to the greatest possible extent. With the publication of its [Declaration of Principles on the observance of Human Rights](#), Bertelsmann has committed to respecting and protecting human rights within the Group and at its suppliers. The policy statement also contains a human rights strategy developed for Bertelsmann. In addition, Bertelsmann has a [policy on human rights and fair working conditions](#).

Shared values and principles

Common goals and shared values are the prerequisites for a corporate culture in which employees, management and shareholders work together successfully, respectfully and in a spirit of trust. These shared values and principles are laid down in the Bertelsmann Constitution and the [Bertelsmann Essentials “Creativity and Entrepreneurship.”](#) In addition, the Bertelsmann Code of Conduct is a binding guideline that defines standards for law-abiding and ethically responsible conduct within the company and toward business partners and the public. Bertelsmann’s actions are also determined by external guidelines. The company is guided by the recommendations of the German Corporate Governance Code for good and responsible corporate governance and largely follows the OECD Guidelines for Multinational Enterprises. Bertelsmann is committed to the principles of the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the core labor standards of the International Labor Organization. As a member of the United Nations Global Compact, Bertelsmann supports the UN’s 2030 Agenda.

The Bertelsmann Code of Conduct is available in 12 languages and requires all Bertelsmann bodies, executives, and employees to conduct business in a legally and ethically responsible manner. It also emphasizes the observance of human rights as part of Bertelsmann’s corporate responsibility. Accordingly, the Code of Conduct clearly prohibits forced labor and child labor and forbids any form of exploitation or discrimination. In addition, the Code of Conduct stipulates compliance with legal regulations to ensure fair working conditions, including those relating to remuneration, working hours, and the protection of privacy. The Code of Conduct also recognizes the rights of employees to freedom of association and collective bargaining in accordance with applicable laws and provisions.

The Bertelsmann policy on human rights and fair working conditions fleshes out the Bertelsmann Essentials and its objectives to go beyond the binding framework of the Code of Conduct. Bertelsmann sees fair working conditions as providing the foundations for its business activities and corporate responsibility.

Compliance Management System

The Bertelsmann Executive Board has established a Compliance Management System (CMS) and appointed a Corporate Compliance Committee (CCC). The CCC submits an annual compliance report to the Bertelsmann Executive Board and the Audit and Finance Committee. The CCC is chaired by the Head of the Corporate Legal Department. The Integrity & Compliance (I&C) department is responsible for the implementation of the topic in the organization and reports to the CCC. I&C supports the CCC in its tasks and makes suggestions for necessary improvements to the CMS.

Communication and training

I&C ensures that employees worldwide are made aware of key legal requirements and internal company policies, including those related to human rights.

Group-wide communication and training measures on the Bertelsmann Code of Conduct – some online, some in person – ensure that Bertelsmann employees are well informed about the rules of conduct and their rights. To refresh their knowledge, all employees who had already completed their Code of Conduct training were assigned a mandatory refresher course.

Speak up channels

Bertelsmann has established comprehensive communication and speak-up channels that enable the reporting of compliance violations, e.g. human rights violations. These reports can also be submitted anonymously. Employees who have a supervisory role or who are particularly responsible for compliance due to their role or position are required to report significant compliance violations. Significant compliance violations that must be reported include, among others, human rights violations, sexual harassment, and/or breaches of antidiscrimination laws. The following reporting channels are available to both employees and third parties to report violations of the prohibition of any forms of modern slavery or other suspected violations at any time: the I&C department (integrity@bertelsmann.com), the electronic whistleblowing system (<http://www.report-concerns.com>), and ombudspersons (ombuds@discussconcerns.com). The I&C department is responsible for providing reporting channels, receiving reports, and coordinating investigations or other follow-up actions. All reports of potential violations are processed and investigated through defined confidential procedures.

If violations are identified, appropriate measures are taken to stop them and prevent future occurrences. This may also include appropriate remediation measures. No cases were identified in the reporting period where such measures led to a loss of income for particularly vulnerable groups.

Compliance risk analysis

Risks related to human rights violations and discrimination are evaluated as part of the annual Compliance Risk Analysis. The results of Bertelsmann's 2025 Compliance Risk Analysis show that the inherent risks of human rights violations and discrimination are minimized to the greatest extent possible in light of the compliance programs and countermeasures in place. These processes also serve to assess the effectiveness of the measures implemented.

Supply Chain Compliance

Respect for human rights in the supply chain is also explicitly required by the Bertelsmann Code of Conduct and the [Supplier Code of Conduct](#). Bertelsmann has also committed itself to respecting and protecting human rights within the Group and among its suppliers in the Declaration of Principles published as part of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG). It includes a ban on child labor and forced labor, a ban on discrimination and intimidation, and affirms the right to freedom of association and collective bargaining. The Declaration of Principles also includes a human rights strategy developed for Bertelsmann. It describes the internal processes that Bertelsmann uses to promote compliance with human rights and explains how potential risks and violations are dealt with. One element of Bertelsmann's human rights strategy is risk management. Using a software solution that supports risk analysis, all of Bertelsmann's relevant suppliers are systematically assessed and prioritized with regard to human rights and environmental risks based on defined criteria and internationally recognized indices. Preventive measures are taken to minimize risks based on the results of the risk analysis.

The Executive Guideline on Anti-Corruption & Integrity formulates appropriate due diligence processes for the selection of business partners, which are to be followed Group-wide. The Bertelsmann Supplier Code of Conduct – a standard part of all contracts – sets specific minimum standards for ethical behavior that must be met by all third parties who wish to do business with Bertelsmann. These obligations apply to all business partners who work for, with, or on behalf of Bertelsmann.

The Bertelsmann Supplier Code of Conduct anchors these minimum ethical requirements throughout the value chain by requiring business partners to impose the requirements set forth in the Bertelsmann Minimum Standards on all of their own downstream business partners working for Bertelsmann.

Employee Matters

Responsibility for ensuring fair working conditions is decentralized and lies with the management of the local companies. Bertelsmann's Chief Human Resources Officer (CHRO) bears primary responsibility for the strategic framework for employee matters within the group. His main Group-wide responsibilities include: setting the strategic HR agenda, aligning management development with the Group's strategic priorities, Bertelsmann University, the standardization and IT enablement of key HR processes, the further development of the corporate culture and Group-wide Corporate Responsibility, and implementing corporate responsibility in the Group. The CHRO chairs the HR Committee, the central body for international HR management at Bertelsmann. Its members are the HR heads of the divisions, who have a functional reporting line to the CHRO, as well as senior leaders within Corporate HR department. With its Policy on Human Rights and Fair Working Conditions, Bertelsmann has established a shared understanding of fair working conditions.

Additional measures taken by Bertelsmann

As part of its mandatory sustainability reporting, Bertelsmann publishes an annual combined [Group Sustainability Statement](#) in the Bertelsmann Annual Report, which also covers the topics of respect for human rights and combating corruption and bribery, among others. In 2024, the first report in accordance with the new European Sustainability Reporting Standards (ESRS) was prepared. As a participant in the United Nations Global Compact (UNGC), Bertelsmann submits an annual Communication on Progress as part of its voluntary sustainability reporting. In doing so, the company also acknowledges its responsibility with regard to the protection of human rights and the issue of forced labor. In addition, Bertelsmann's sustainability performance is assessed by various rating agencies (ISS ESG, EcoVadis, CDP, MSCI, Sustainalytics, S&P Global).

For the non-financial issues defined in the German Commercial Code (HGB) – employee and social issues, anti-corruption and anti-bribery, respect for human rights, and environmental issues – no significant risks were identified as part of the 2024 reporting. In addition, Bertelsmann regularly conducts a global employee survey that includes questions about employee awareness of the Code of Conduct as well as working conditions and employee satisfaction.

In accordance with the requirements of the law, and after careful examination, I hereby confirm that the information reported for the year under review is true, accurate and complete.

This statement was approved by the Board of Bertelsmann SE & Co. KGaA on 24.04.2026.

Gütersloh, 24.04.2026



Thomas Rabe
Chairman and Chief Executive Officer of Bertelsmann

www.bertelsmann.com | integrity.bertelsmann.com

Sources:

www.legislation.gov.uk/ukpga/2015/30/section/54/enacted
[Public Bill \(Senate\) S-211 \(44-1\) - Royal Assent - Fighting Against Forced Labour and Child Labour in Supply Chains Act - Parliament of Canada](#)
[Sustainability Report](#)
[Code of Conduct](#)
[Bertelsmann Essentials](#)
[Supplier Code of Conduct](#)
[Declaration of Principles Human Rights](#)
[policy human rights and fair working conditions](#)