Bertelsmann Policy Environment

BERTELSMANN POLICY ENVIRONMENT

Preamble

In line with our core values, the Bertelsmann Essentials, we take responsibility in society and for our environment – with the aim of shaping a better future. We recognise the impact we have on society and the environment, and we seek to make a positive difference.

This Bertelsmann Policy Environment expresses the common understanding of environmental protection at Bertelsmann.

Responsibility for the environment

Bertelsmann regards environmental protection as an important part of its corporate responsibility. Against this background, we are guided by the following principles:

Climate change mitigation

Bertelsmann recognises climate change as a serious threat to society and the economy. With our "Bertelsmann Climate Target 2030", we support the international target of limiting global warming to 1.5°C compared to pre-industrial levels.

We aim to reduce the reported direct and indirect greenhouse gas emissions (scope 1 to 3). Measures to avoid and reduce greenhouse gas emissions also mitigate potential risks such as market or regulatory risks for our businesses in the transition phase to a decarbonised economy.

Unavoidable greenhouse gas emissions from our own sites, employee mobility and the production of own products and services will be offset until 2030 by financing high-quality climate protection projects outside the company's value chain (offsetting).

Climate change adaptation

We anticipate the impacts of global warming, such as the increased risk of extreme weather events or changes in ecosystems. As part of our risk management, we initiate the necessary measures to protect our employees and assets at an early stage.

The analysis and reporting of climate-related risks are integrated into our Group-wide risk reporting system.

Energy efficiency and renewable energies

Energy saving, efficient energy utilisation and the expansion of renewable energy generation are important levers for reducing greenhouse gas emissions. We do not use solid fossil fuels such as

hard coal or lignite in our operations and expect our suppliers and business partners to phase out fossil fuels.

The procurement of renewable energy is an important requirement for all our sites with an electricity consumption of more than 100 MWh. Moreover, we are committed to expanding the generation of renewable energies such as photovoltaic systems at our own company sites wherever this is technically possible.

We aim to continuously increase energy efficiency by using energy-saving technologies, the implementation of suitable energy management systems and the promotion of environmentally conscious behaviour among all our employees.

Minimization of environmental impacts

We strive to minimize the pollution of air, water and soil caused by the release of hazardous substances and substances of concern, including microplastics. This also includes the recycling or reprocessing of electronic devices and the proper disposal of other waste.

For our books and magazines, we only use paper whose pulp content has been bleached elemental or total chlorine free (ECF/TCF).

By increasing the use of climate-friendly mobility solutions, we aim to minimize the environmental impacts of our employees' business trips and commutes.

Protection of water resources

In our plants and offices worldwide, we mainly use water from mains networks or groundwater reservoirs to cool buildings and facilities, to supply our employees with water and for hygiene purposes. In this context, we are committed to using water as resource-efficiently as possible.

We also require our suppliers to use water responsibly and efficiently This is particularly important for suppliers with high water consumption, such as paper manufacturers or operators of data centres, as well as for suppliers in regions with a high risk of water scarcity.

Intact ecosystems and sustainable forestry

Intact ecosystems are a prerequisite for a prosperous society and economy. We are committed to doing our part to protect nature and combat deforestation by using recycled paper and paper from demonstrably well-managed forests and responsible production.

When procuring paper and awarding printing contracts, we work closely with our suppliers to avoid

negative impacts such as the loss and degradation of natural forests, including the associated greenhouse gas emissions and damage to biodiversity. Trees from old and endangered forests and forests with high conservation value must not be used to produce our papers.

Bertelsmann does not tolerate illegal activities such as unlawful trade of timber and the violation of human rights in logging operations.

Resource efficiency and circular economy

We endeavour to use natural resources such as energy, water, soil and raw materials responsibly when procuring materials and manufacturing and selling products and services.

When selecting suppliers and materials, we take relevant environmental aspects such as the use of renewable energies, proof of origin for critical raw materials, greenhouse gas emissions and evidence of certified energy and environmental management systems into account.

Our companies support the necessary transition to a circular economy by using renewable raw materials, designing products and processes for recycling and avoiding and minimizing waste wherever possible.

The Bertelsmann Executive Board adopted an Executive Board Guideline to implement this policy and to organize environmental management within the Group.

The Bertelsmann Code of Conduct and the Bertelsmann Policy on Human Rights and Fair Working Conditions set out further requirements that we as a company and all our employees are committed to upholding. The Bertelsmann Supplier Code of Conduct specifies the expectations and requirements for our business partners. These include suppliers, vendors, consultants, agents, subcontractors, minority shareholders, sales representatives and freelancers.

Organizational structure of environmental management at Bertelsmann

As the highest management body, the Executive Board of Bertelsmann Management SE defines this policy and the environmental objectives for the Group. The status of achievement is regularly reviewed by the Executive Board.

In line with Bertelsmann's corporate structure, the divisions and Group companies bear the operational responsibility for environmental and climate protection. Due to the diverse environmental requirements of the various business models, the divisions and Group companies have established adequate measures for environmental management and, where deemed necessary, certified management systems.

The Bertelsmann Corporate Responsibility Council, which is chaired by the Chief Human Resources Officer of Bertelsmann Management SE (CHRO), is a cross-divisional body that advises the Executive Board on the strategic development of environmental management.

The international "be green" committee with representatives from the divisions serves to coordinate and exchange information on environmental topics. The "be

green" committee is headed by the Corporate Responsibility Department. The core tasks of the "be green" committee include the further development of environmental management and the achievement of Group-wide environmental objectives as well as the coordination and implementation of environmental reporting.

Employee commitment

The active participation of our employees is an important prerequisite for enhancing environmental performance. We therefore raise their awareness of environmental issues and expect them to behave in an environmentally conscious manner.

By promoting the exchange of knowledge and offering training, we empower our employees to make environmentally conscious decisions in their daily work and beyond. Through recurring campaigns such as environmental days, we inform and sensitize our employees to topics such as climate-friendly mobility or waste avoidance.

Dialogue with interest groups

Bertelsmann sees itself as an active member of society. We are therefore in constant dialogue with our customers, business partners and other stakeholders. The company's objective is to harmonize economic interests with the social and environmental concerns of our stakeholders. Bertelsmann fulfils the transparency requirements of its stakeholders about its environmental performance as part of its annual corporate reporting. Bertelsmann has been a participant in the UN Global Compact since 2008.

Reporting

Bertelsmann regularly publishes information in corporate reports and on its website (www.bertelsmann.com/corporate-responsibility) to provide all interested stakeholders with factual and comprehensive information about the company's environmental activities. Since 2010, Bertelsmann has published a carbon footprint report in accordance with the International Greenhouse Gas Protocol. Environmental reporting is carried out in accordance with the European Sustainability Reporting Standards (ESRS) as part of corporate reporting. Bertelsmann also participates in relevant ESG ratings in which our sustainability performance is assessed by third parties.

About this policy

The Bertelsmann Policy Environment applies to Bertelsmann SE & Co. KGaA as well as 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 Policy Environment of the Executive Board was published on November 12, 2024. This policy is reviewed every two years. If you have any questions or comments, please contact begreen@bertelsmann.com.