Bertelsmann Policy Safety

BERTELSMANN POLICY
SAFETY

Preamble

At Bertelsmann, we view our employees as crucial for our company's success and continued development. Employees who feel safe within their working environment are more motivated, creative, and productive. The Bertelsmann Policy Safety expresses the common understanding of safety at Bertelsmann.

Safety culture at Bertelsmann

We aim to ensure safe and healthy working conditions. Everyone working at Bertelsmann shall be protected from work-related injury and ill-health. We adhere to the applicable local legal safety standards and regulations.

Every single workplace accident is one too many. It is our objective to reduce the number of accidents as much as possible. Above all, life-threatening and fatal accidents must be prevented.

The safety of our employees in the workplace is a top priority. Our executives and supervisors contribute to our safety culture by taking occupational safety into account when making business decisions and by ensuring it in their daily actions.

We implement safety management systems to eliminate hazards as far as possible and to reduce risks to an acceptable level. We expect all our employees, regardless of their position, to proactively contribute to a safe working environment and to help prevent accidents. We work collaboratively with our employees and their representatives to promote this.

We aim to continuously improve our safety management systems. We establish targets, track our progress and report accordingly.

Group-wide advancement of Safety

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

Group-wide management approach	The Executive Board Guideline C.5.6 Health and Safety defines roles and responsibilities at different levels of the organization to ensure the effective implementation of Group-wide Health and Safety Management. We define basic requirements for local health and safety management systems and are guided by external standards such as ISO 45001.
Regular risk assessments	Our Group companies conduct regular or event-related risk assessments to identify potential hazards and evaluate associated risks. The findings from these assessments are crucial in determining the necessary safety measures.

Effective control of risks and hazards

We apply the following hierarchy of controls to effectively mitigate risks and hazards:

Hazard sources in the workplace should be eliminated whenever possible. If this is not feasible, we aim to replace hazardous materials or processes with safer alternatives.

We implement technical solutions to minimize exposure to hazards. We are implementing organizational measures and work processes to further reduce the risk.

We provide personal protective equipment to protect workers from any remaining risks. This includes items such as helmets, gloves, safety glasses, and respiratory protection. All necessary personal protective equipment is provided free of charge.

Emergency preparedness

We prepare for emergency situations and develop and update plans for relevant emergency scenarios. Our objective is to have a workforce that is well-prepared for emergencies.

Safety awareness, skills and training

Competent employees are key for successful Safety Management. Employees are informed about the hazards and risks they may encounter in their working environment. Where necessary, mandatory training programs are provided to ensure employees know how to handle these hazards and risks effectively. This training entails the proper use of equipment and materials, including personal protective equipment.

We place great importance on training in areas such as first aid and fire safety and encourage our employees to participate in such training beyond the legal requirements.

Continuous improvement

We strive for continuous improvement of our safety performance.

We employ the Plan-Do-Check-Act (PDCA) cycle as a structured approach to achieve this objective. By planning our safety initiatives, implementing them, monitoring their effectiveness, and making necessary adjustments, we ensure the ongoing improvement of our Safety Management.

We view workplace accidents as obligations to learn and improve. We aim to share experiences and expertise across our locations and divisions.

These principles apply to all divisions and Group companies worldwide. Additional measures will be taken to address local working conditions, requirements and needs.

The Bertelsmann Code of Conduct and the Bertelsmann Policies on Human Rights and Fair Working Conditions as well as on Health & Well-being 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.

Organizational structure of Safety Management at Bertelsmann

The Executive Board of Bertelsmann Management SE (Executive Board), as the highest management body, defines cross-divisional safety priorities and objectives for the Group in the Bertelsmann ESG Program and receives regular updates on progress made. In line with Bertelsmann's corporate structure, the divisions and Group companies bear operational responsibility for Safety Management locally.

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 further development of Safety Management.

The international Safety Working Group with representatives from Bertelsmann divisions serves to coordinate and facilitate cross-divisional information exchange. The Safety Working Group is managed by the Corporate Responsibility department. The core tasks of the Safety Working Group include the continuous improvement of Safety Management, including the advancement of our safety culture, the achievement of Group-wide objectives and the coordination and further development of reporting on safety.

About this policy

The Bertelsmann Policy Safety 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 Policy Safety of the Executive Board was published on December 16, 2024. This policy is reviewed every two years. If you have any questions or comments, please contact safety@bertelsmann.com.