

# Bertelsmann Policy Diversity, Equity & Inclusion

# BERTELSMANN POLICY – DIVERSITY, EQUITY & INCLUSION (DE&I)

## Preamble

Our core values, the Bertelsmann Essentials, state that the diversity of our employees is crucial for creativity – and thus a cornerstone of Bertelsmann's business success. As an international media, services, and education company, we recognize our responsibility to promote diversity, equal opportunities and inclusion among our employees, in our media content and our businesses, as well as to ensure a non-discriminatory environment.

This Bertelsmann Diversity, Equity & Inclusion Policy expresses the shared understanding of DE&I at Bertelsmann.

## Our position on Diversity, Equity & Inclusion

We value the diverse perspectives that our employees contribute through their identities, backgrounds, and lived experiences.

By nurturing a culture of respect and belonging, we enable a working environment where our employees can openly express their ideas, opinions, and constructive criticism to challenge the status quo and explore new paths.

Our objective is to promote diversity Group-wide and at all levels of the company and to mirror the diverse societies we operate in.

We are committed to creating a working environment based on fairness and collaboration as well as mutual understanding and appreciation. Concurrently, we endeavor to take individual needs of our employees into account, enabling them to achieve their full potential.

This position is firmly anchored in the values and culture of our company.

## Group-wide advancement of Diversity, Equity & Inclusion

Against this background, we are guided by the following principles:

### Promoting diverse perspectives

Bertelsmann thrives on the diversity of its employees' perspectives. A working environment in which everyone can realize their full potential requires mutual understanding and consideration of individual needs. That is why we take measures to better understand and specifically promote diverse perspectives in our company. Employee-led groups make a valuable contribution towards this principle.

### Embedding DE&I in HR processes

DE&I should be tangible elements of our employees' day-to-day work. This requires DE&I to be anchored in all phases of the

employee life cycle. Accordingly, we continuously review our HR processes and develop them further through tailored measures. Our learning offers enable executives and employees from HR departments to fulfill their responsibility for DE&I.

### **Data-based management**

In implementing DE&I, we base our approach on the local context and the needs of our employees. A solid (HR) data foundation enables us to continuously identify relevant impacts, risks and opportunities, take appropriate measures and track progress.

### **Intensifying exchange and networking**

We actively support networking on DE&I within the company in order to promote the exchange of knowledge and experiences as well as cross-divisional collaboration. In this context, we also engage in dialogue with external experts and cooperate with various networks.

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

The following convictions are embedded in the Bertelsmann Code of Conduct and are also demanded of our business partners through the Bertelsmann Supplier Code of Conduct:

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. Discrimination against LGBTIQ+ individuals, racism, antisemitism, religious intolerance, sexism, sexual harassment, bullying, abuse of power, intimidation, threats, and any other types of harassment are not tolerated. All decisions, such as those related to recruitment, promotions, remuneration, disciplinary actions, or the selection of business partners, must be made impartially and without bias.

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

### **Organizational structure of Diversity, Equity & Inclusion Management at Bertelsmann**

Change begins at the top, and the responsibility for DE&I within the Group lies with the Executive Board. As the highest management body, it sets the strategic objectives for the Group. It monitors and assesses the status quo of DE&I in the company and takes appropriate measures, where necessary.

The Bertelsmann Corporate Responsibility Council, which is chaired by the Group Chief Human Resources Officer (CHRO), is a cross-divisional body that advises the Executive Board on the strategic development of DE&I management within the Group. 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 DE&I locally. Both executives and HR departments have a special responsibility due to their function as role models and their position in designing DE&I-relevant processes and measures. At the same time, we expect all employees to continuously contribute to an appreciative cooperation.

An international working group with representatives from the divisions and Corporate ensures Group-wide networking and the exchange of information on DE&I at Bertelsmann. Its core tasks include the strategic development of DE&I management and the anchoring of DE&I in all relevant processes and in the corporate culture.

The Bertelsmann Diversity, Equity & 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. 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 Diversity, Equity & 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 Diversity, Equity & Inclusion Policy of the Executive Board was first published on April 29, 2021 and updated on November 12, 2024. This policy is reviewed every two years. If you have any questions or comments, please contact [diversity@bertelsmann.com](mailto:diversity@bertelsmann.com).*