

UN Global Compact Questionnaire 2022

The option to submit the annual Communication on Progress (CoP) is currently not available on the UN Global Compact online platform due to technical issues. For this reason, we are publishing our progress report provisionally on our website. As soon as submission via the official platform of the UN Global Compact is possible, our progress report will be available there.

Beginning in 2023, the Communication on Progress will require participants to annually a) submit an electronic statement by the Chief Executive Officer expressing continued support for the UN Global Compact as well as b) complete the Communication on Progress questionnaire. This reference document contains the questions that will be presented in the questionnaire.

Overall, the questionnaire is designed to add value to participants in several ways:

- Build credibility and brand value by showing their commitment to corporate sustainability, the Ten Principles, and the Sustainable Development Goals.
- Measure and demonstrate progress on the Ten Principles in a consistent and harmonized way.
- Receive insight, learn and continuously improve performance. The new platform will provide technical help, resources, and guidance at every step of the way. It will help to identify gaps and set goals to improve sustainability performance year over year.
- Compare progress against peers with access to one of the largest sources of free, public, and comparable corporate sustainability data.

The questionnaire is structured in five sections. The first section, Governance, provides a cross-cutting overview of the companies' sustainability governance structure. The remaining four sections, Human Rights, Labour, Environment, and Anti-Corruption, survey companies about their performance with respect to the Ten Principles of the UN Global Compact. Within each section, companies will answer questions that address processes and policies that demonstrate companies' commitment to progress, efforts taken to prevent negative social and environmental impact, performance indicators, and remediation and reporting mechanisms to address grievances and reflect on lessons learned.

Notably, the Human Rights and Environment sections contain additional nuance. The Human Rights section provides companies with the opportunity to select their material topics for disclosure, while the Environment section includes curated sector-specific questions, for example on water and biodiversity, that are to be answered only by business participants operating in industries in which such topics are considered material. This document contains all questions and possible answer options; not all companies will answer all questions when using the digital platform.

Please note that this questionnaire may be subject to minor edits. Please refer to the digital platform for the final version. Please refer to the *Communication on Progress Guidebook* for additional guidance including question rationale and calculation methodology.



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COMMUNICATION ON PROGRESS QUESTIONNAIRE

GOVERNANCE

Policies and Responsibilities

G1. Does the board/highest governance body or most senior executive of the company:
Linked to: GRI Disclosures 2-12, 2-14, 2-22 (2021)
(Select all that apply)

- ☐ Issue an annual statement about the relevance of sustainable development to the company
- ☐ Issue an annual statement that addresses impacts on both people and the environment
- ☐ Issue an annual statement highlighting a zero tolerance for corruption
- ☒ Sign off on organizational sustainability targets
- ☒ Supervise Environmental, Social, and Governance reporting
- ☒ Regularly review potential risks related to the business model
- ☐ None of the above

Please provide additional information: _____

G2. Does the company have a publicly stated commitment regarding the following sustainability topics?
Linked to: GRI Disclosure 2-23 (2021)
(Matrix - Select one answer option per line)

	No, this is not a current priority	No, but we plan to have a commitment within 2 years	Yes, and the commitment is focused on our own operations	Yes, and the commitment includes our own operations and suppliers	Yes, and the commitment includes our own operations and the value chain (including suppliers, consumers, communities, other business relationships)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide a link, upload the document, and/or provide additional information:

Bertelsmann Code of Conduct: <https://www.bertelsmann.de/media/unternehmen/grundwerte/code-of-conduct-2021/code-of-conduct-en.pdf>
Bertelsmann Supplier Code of Conduct: <https://www.bertelsmann.com/media/verantwortung/downloads/englisch/supplier-code-of-conduct-en.pdf>

G3. Does the company have a code of conduct in place regarding each of the following sustainability topics?

Linked to: NASDAQ G6.1; GRI Disclosure 2-23 (2021)

(Matrix - Select one answer option per line)

	No, this is not a current priority	No, but we plan to have a code of conduct within two years	Yes, focused on employee conduct	Yes, focused on employees and suppliers	Yes, focused on our own operations and the value chain (including suppliers, consumers, communities, other business relationships)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: In addition to the Bertelsmann Code of Conduct, there is also the Bertelsmann Supplier Code of Conduct, that applies to all business partners including, among others, suppliers, sales partners, consultants, agents, sub-contractors, minority shareholders, sales representatives, and freelance collaborators.

G4. Has the company appointed an individual or group responsible for each of the following sustainability topics?

Linked to: GRI Disclosure 2-13 (2021)

(Matrix - Select one answer option per line)

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision-making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence of some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the organization (e.g., has access to relevant information, includes most senior members of organization)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: _____

G5. Does the company have a formal structure(s) (such as a cross-functional committee) to address each of the following sustainability topics?

Linked to: GRI Disclosures 2-9, 2-13 (2021)

(Matrix - Select one answer option per line)

	No formal structure	Yes, and with limited influence on outcomes (e.g., limited access to internal information necessary to understand risks, poor representation from relevant departments or functions)	Yes, with moderate influence on outcomes (e.g., it includes representatives of some functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes (e.g., it includes representatives of functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, it involves one or more members of senior management)	Yes, and with direct influence at the highest level of the organization (e.g., full access to relevant information, it involves members at highest level of organization)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information:

The body for the strategic development and the management of corporate responsibility (CR) at Bertelsmann is the CR Council. The CR Council consists of executives from the corporate divisions, corporate and the Chief Human Resources Officer of Bertelsmann, who acts as the chairman. The CR Council focuses on the further development of group-wide Environmental, Social, Governance (ESG) priorities in line with the corporate strategy, anchoring corporate responsibility and ESG reporting more strongly in the corporate divisions and the cross-divisional coordination of ESG activities.

Prevention

G6. Does the company have a process or processes to assess risk?

Linked to: GRI Disclosure 205-1 (2016)

(Matrix - Select one answer option per line)

Risk Category:	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers [Prompts G6.1]	Yes, related to our own operations and the value chain (including suppliers, consumers, communities, other business relationships) [Prompts G6.1]
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Corruption risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

G6.1 During the assessment of risk, has your company reviewed those suppliers and/or other business relationships where the risk related to human rights, labour, environment and/or anti-corruption may be particularly severe?
(Matrix - Select one answer option per line)

Risk Category:	No	Yes
Human rights risks	<input type="radio"/>	<input type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>
Corruption risks	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: _____

G7. Does the company have a due diligence process through which it identifies, prevents, mitigates, and accounts for actual and potential negative impacts on sustainability topics?
Linked to: GRI Disclosures 2-12, 2-23-a-ii, 3-1, 3-3-d (2021)
(Matrix - Select one answer option per line)

Risk Category:	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers [Prompts G7.1]	Yes, related to our own operations and the value chain (including suppliers, consumers, communities, other business relationships) [Prompts G7.1]
Human rights risks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour rights risks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental risks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Corruption risks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

G7.1 During the due diligence process, has your company reviewed those suppliers and/or other business relationships where the risk of adverse impacts on human rights, labour, environment and/or anti-corruption may be particularly severe?
 Linked to: GRI Disclosures 2-23-e, 3-1 (2021)
 (Matrix - Select one answer option per line)

Risk Category:	No	Yes
Human rights risks	<input type="radio"/>	<input type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>
Corruption risks	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Concerns and Grievance Mechanisms

G8. Are there any processes through which members of the company’s workforce can raise concerns about the company’s conduct related to human rights, labour rights, environment, or anti-corruption?
 Linked to: Reporting Guidance on the 10th Principle Against Anti-corruption - B3; GRI Disclosure 2-26 (2021)
 (Radial - Select One)

- ☐ No, this is not a current priority
- ☐ No, but we plan to within two years
- ☐ Yes, we have an informal process (e.g., through supervisors, others) [\[Prompts G8.1\]](#)
- ☒ Yes, we have a formal process [\[Prompts G8.1\]](#)

Please provide additional information: .

Actual and/or suspected infringements of the ones mentioned in the table above can be reported by Bertelsmann employees and third parties by using channels of the existing compliance management. Information on the options and the procedure applicable to reporting incidents can be viewed on the Bertelsmann website: integrity.bertelsmann.de. An investigation is initiated for each compliance case reported, based on a defined procedure in line with the Executive Board’s guideline for dealing with compliance violations, with the aim of fully clarifying each case. If Bertelsmann learns of actual and/or suspected human rights violations at business partners, the company contacts those responsible and takes the necessary remedial action.

If respondent answers either of the 'Yes' options in G8, the below question will be displayed.

G8.1. Please provide additional detail regarding the process(es) the company has through which members of the company's workforce can raise concerns about the company's conduct.

Linked to: GRI Disclosure 2-26 (2021)

(Matrix - Select one answer option per line)

	No	Yes
Is the process communicated to all employees/workers in local languages	<input type="radio"/>	<input checked="" type="radio"/>
Is the process available to non-employees (e.g., suppliers, consumers, communities, and other business relationships)	<input type="radio"/>	<input checked="" type="radio"/>
Is the process confidential (e.g., whistleblowing process)	<input type="radio"/>	<input checked="" type="radio"/>
Are there processes in place to avoid retaliation	<input type="radio"/>	<input checked="" type="radio"/>
Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)	<input type="radio"/>	<input checked="" type="radio"/>
Other (Please provide additional information) <i>[If yes, makes text box mandatory]</i>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: Compliance concerns can be communicated to contacts at the local company, to the Bertelsmann Integrity & Compliance department, the Bertelsmann Ombudspersons or through the Bertelsmann Speakup system. The Bertelsmann Code of Conduct as well as the Board Guideline 6.6 (Guideline for Handling Suspected Compliance Violations) contain detailed whistleblower protection regulations.
Additional information can be found here: <https://www.bertelsmann.com/company/essentials/compliance/speak-up/>

Lessons

G9. How does the company capture lessons regarding each of the following sustainability topics?

Linked to: GRI Disclosure 3-3-e (2021)

(Matrix - Select one answer option per line)

Please select highest level of engagement. Options progress from left to right.

	No lessons are regularly captured	Conducts root cause analyses/investigation of incidents	Conducts root cause analyses/investigation and changes organizational policies, processes, and practices accordingly	Systematically conducts root cause analyses/investigation and leverages learnings to influence both internal and external affairs
Human Rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Executive Pay

G10. Is executive pay linked to performance on one or more of the following sustainability topics?

Linked to: CDP W6.4 2022, CDP F4.3a 2022, CDP C1.3a (2022); Nasdaq G3 2335; GRI Disclosure 2-19 (2021)

(Matrix - Select one answer option per line)

	No, and we have no intention to change for this is not a current priority	No, but we plan to within two years	Yes
Human Rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Anti-Corruption	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: In 2023, executive pay is linked to Labour Rights / Decent Work and Environment topics.

Board Composition

G11. Percentage of individuals within the company's board/highest governance body by:

Linked to: ISAR D.1.2., ISAR D.1.3.; GRI Disclosures 2-9 (2021), 405-1 (2016)

(Matrix - Percentage & Commentary for each line)

	Number	Not applicable
Total number of board members (#)	15	
Male (%)	66.67%	
Female (%)	33.33%	
Non-binary (%)	—	
Under 30 years old (%)	0	
30-50 years old (%)	13.33%	
Above 50 years old (%)	86.67%	
From minority or vulnerable groups (%)	—	
Executive (%)		x
Independent (%)	46.67%	

Please provide additional information: The information provided in the table above refers to the Bertelsmann Supervisory Board, which is the highest governance body. Bertelsmann is not a listed company. In addition to the 7 independent members, there are 3 members of the shareholder family and 5 employee representatives on the Supervisory Board.

With regard to the Bertelsmann Executive Board, the following information applies:

Total number of board members (#): 3

Male (%): 100

Female (%): 0

Non-binary (%): -

Under 30 years old (%): 0

30-50 years old (%): 33

Above 50 years old (%): 66

From minority or vulnerable groups (%): -

Executive (%): 100

Independent (%): 0

G12. Do you produce sustainability reporting according to:

Linked to: Nasdaq G9.1

(Select all that apply)

- ☒ National/local regulation on sustainability
- ☐ Security exchange regulations
- ☒ Non-Financial Reporting Directive of the European Union (NFRD)/Corporate Sustainability Reporting Directive (CSRD)
- ☒ Global Reporting Initiative (GRI)
- ☐ Sustainability Accounting Standards Board (SASB, now consolidated into the IFRS Foundation)
- ☐ International Integrated Reporting Council (IIRC, now consolidated into the IFRS Foundation)
- ☐ Climate Disclosure Standards Board (CDSB, now consolidated into the IFRS Foundation)
- ☐ Task Force on Climate-related Financial Disclosures (TCFD)
- ☒ Other voluntary frameworks (Please specify in text box) *[Makes text box mandatory]*
- ☐ No sustainability reporting according to any frameworks nor regulations outside of this Communication on Progress

Please provide additional information: Greenhouse Gas (GHG) Protocol

Data Assurance

G13. Is the information disclosed in this questionnaire assured by a third-party?

Linked to: CDP C10.1 2022; GRI Disclosure 2-5 (2021)

(Select all that apply)

- ☐ No assurance for any metrics
- ☐ Limited assurance for minority of metrics (e.g., GHG emissions only)
- ☐ Limited assurance for majority of metrics
- ☒ Reasonable assurance for minority of metrics
- ☐ Reasonable assurance for majority of metrics
- ☐ Other (Please provide additional information) *[Makes text box mandatory]*

Please provide additional information: The following social and environmental metrics were audited with reasonable assurance and are covered in the Combined Non-Financial Statement as part of the Bertelsmann Combined Management Report 2022: proportion of women in top and senior management and respective talent pools as well as career development pools, sites with green electricity, greenhouse gas (GHG) emissions (Scope 1 and 2 combined), as well as eligible and aligned revenues, capital expenditures (CapEx), and operating expenditures (OpEx) as defined by the EU Taxonomy for the environmental objectives "climate change mitigation" and "climate change adaptation".

HUMAN RIGHTS

Materiality

HR1. Which of the following has the company identified as material human rights topics connected with its operations and/or value chain, whether based on their salience (e.g., the most severe potential negative impacts on people) or another basis?

Linked to: GRI Disclosure 3-2 (2021)

(Select all that apply)

- ☐ Freedom of association and the effective recognition of the right to collective bargaining
- ☐ Child labour
- ☐ Forced labour
- ☒ Non-discrimination in respect of employment and occupation
- ☒ Safe and healthy working environment
- ☒ Working conditions (wages, working hours) *[Prompts additional line 'Working conditions (wages, working hours)' in Questions L1, L2, L3, L4, L5, L12]*
- ☒ Freedom of expression *[Prompts additional line 'Freedom of expression' in Questions HR2-HR7]*
- ☐ Access to water and sanitation *[Prompts additional line 'Access to water and sanitation' in Questions HR2-HR7]*
- ☐ Digital security/privacy *[Prompts additional line 'Digital security/privacy' in Questions HR2-HR7]*
- ☒ Gender equality and women's rights *[Prompts additional line 'Gender equality and women's rights' in Questions HR2-HR7]*
- ☐ Rights of indigenous peoples *[Prompts additional line 'Rights of indigenous peoples' in Questions HR2-HR7]*
- ☐ Rights of refugees and migrants *[Prompts additional line 'Rights of refugees and migrants' in Questions HR2-HR7]*
- ☐ Other _____

Please provide additional information: An overview of "The 8 Bertelsmann Priority CR Topics" can be found here: <https://www.bertelsmann.com/media/verantwortung/downloads/englisch/cr-8prio-kommunikation-matrix-en-211213.pdf>

In March 2023, a Human Rights & Fair Working Conditions Policy was adopted by the Bertelsmann Executive Board: <https://www.bertelsmann.com/media/verantwortung/downloads/englisch/bertelsmann-policy-human-rights-and-fair-working-conditions-en.pdf>

Note: Labour rights topics (Freedom of association and the effective recognition of the right to collective bargaining, child labour, forced labour, non-discrimination in respect of employment and occupation, and a safe and healthy working environment) are a subset of human rights and for completeness, were included in this question. Regardless of these labour topics being selected as material in this question or not, all companies will be asked to provide additional details about these labour rights topics in the next section (L.1 and following). For the other human rights topics selected as material in this question, seven additional questions will be asked in the following section.

Commitment

HR2. Does the company have a policy commitment in relation to the following human rights topics? Matrix will be populated only for the human rights topics selected in HR1.

Linked to: GRI Disclosures 2-23-a-iv, 2-23-b, 3-3-c (2021)

(Matrix - Select one answer option per line)

Human Rights Topics:	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy [Prompts HR 2.1]	If yes, year policy last reviewed (YYYY)
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	2021
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Digital security/privacy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	2021
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

Please provide a link, upload the document, and/or provide additional information: <https://www.bertelsmann.de/media/unternehmen/grundwerte/code-of-conduct-2021/code-of-conduct-en.pdf>
<https://www.bertelsmann.com/media/verantwortung/downloads/englisch/bertelsmann-dei-policy-en.pdf>

If respondent answers 'Yes' in HR2, the below question will be displayed for each relevant topic.

HR2.1. For each human rights policy commitment, is it:

Linked to: GRI Disclosures 2-23-c, 2-23-d, 2-23-e (2021)

(Matrix - Select all that apply for each line)

Human Rights Topics:	Aligned with international human rights standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers	Applied to the company's own operations and the value chain (including suppliers, consumers, communities, other business relationships)	Developed involving human rights expertise from inside and outside the company	Other (Please provide additional information) [Makes text box mandatory]
Freedom of expression	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security/privacy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In March 2023, a Human Rights & Fair Working Conditions Policy was adopted by the Bertelsmann Executive Board: <https://www.bertelsmann.com/media/verantwortung/downloads/englisch/bertelsmann-policy-human-rights-and-fair-working-conditions-en.pdf>

Please provide additional information: [media/verantwortung/downloads/englisch/bertelsmann-policy-human-rights-and-fair-working-conditions-en.pdf](https://www.bertelsmann.com/media/verantwortung/downloads/englisch/bertelsmann-policy-human-rights-and-fair-working-conditions-en.pdf)

Prevention

HR3. In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following human rights topics? Matrix will be populated only for the human rights topics selected in HR1.

Linked to: GRI Disclosures 3-1-b, 3-3-f (2021)

(Matrix - Select one answer option per line)

Please select the company's highest level of engagement. Options progress from left to right.

Human Rights Topics:	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security/privacy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

HR4. What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with this human rights topic?

Matrix will be populated only for the human rights issues selected in HR1.

Linked to: GRI Disclosure 3-3-d (2021)

(Matrix - Select all that apply for each line)

Human Rights Topics:	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective Action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information) [Makes text box mandatory]	No action within reporting period
Freedom of expression	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security/privacy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: Other: Bertelsmann has established an ESG Program (2021-2023) for its ESG priorities (creative/journalistic independence & freedom of expression; content responsibility; fair working conditions; diversity, equity & inclusion; health & well-being; learning; responsibility in the supply chain; and climate change). The Bertelsmann ESG Program (2021–2023) with its more than 150 group-wide measures, is currently being implemented; progress is regularly monitored. It also includes a Human Rights & Fair Working Conditions Policy that was adopted by the Executive Board in March 2023.

HR5. Who receives training for the following human rights topics? Matrix will be populated only for the human rights topics selected in HR1.

Linked to: GRI Disclosure 3-3-d (2021)

(Matrix - Select all that apply for each line)

Human Rights Topics:	No training provided	Select employees	All employees	Contractors	Direct suppliers of the organization	Indirect suppliers of the organization	Other – such as partners, clients, etc.
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security/privacy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

HR6. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following human rights topics? Matrix will be populated only for the human rights issues selected in HR1.

Linked to: GRI Disclosure 3-3-e (2021)

(Matrix - Select one answer option per line)

Please select the company's highest level of engagement. Options progress from left to right.

Human Rights Topics:	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)	Other (Please provide additional information) [Makes text box mandatory]
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security/privacy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: Targets / goals that were adopted as part of the Bertelsmann ESG Program (2021-2023) that Bertelsmann has established for its ESG priorities (creative/journalistic independence & freedom of expression; content responsibility; fair working conditions; diversity, equity & inclusion; health & well-being; learning; responsibility in the supply chain; and climate change). The Bertelsmann ESG Program (2021–2023) with its more than 150 group-wide measures, is currently being implemented; progress is regularly monitored. It also includes a Human Rights & Fair Working Conditions Policy that was adopted by the Executive Board in March 2023.

Response

HR7. During the reporting period, has the company been involved in providing or enabling remedy if it has caused or contributed to adverse impact associated with the following human rights topic(s)? Matrix will be populated only for the human rights topics selected in HR1.

Linked to: GRI Disclosure 3-3-d-ii (2021)

(Matrix - Select one answer option per line)

Human Rights Topics:	No remedy provided/enabled	Yes, remedy provided/enabled	No adverse impact identified or caused	Choose to not disclose
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security/privacy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

HR8. Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to take to implement the human rights principles, including goals set and any challenges faced and actions taken towards prevention and/or remediation.

Linked to: GRI Disclosures 3-3-c and 3-3-d (2021)

(Text Box)

Bertelsmann has established an ESG Program (2021-2023) for its ESG priorities (creative/journalistic independence & freedom of expression; content responsibility; fair working conditions; diversity, equity & inclusion; health & well-being; learning; responsibility in the supply chain; and climate change). The Bertelsmann ESG Program (2021–2023) with its more than 150 group-wide measures, is currently being implemented; progress is regularly monitored. It also includes a Human Rights & Fair Working Conditions Policy that was adopted by the Executive Board in March 2023.

LABOUR

Commitment

L1. Does the company have a policy commitment in relation to the following labour rights principles? For the user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.

Linked to: GRI Disclosure 3-3-c (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

(Matrix - Select one answer option per line)

Labour Topics:	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy <i>[Prompts L1.1; L1.2 (first labour topic only)]</i>	Not applicable (Please provide additional information) <i>[Makes text box mandatory]</i>	If yes, year policy last reviewed (YYYY)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	_____
Forced labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	_____
Child labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	_____
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	_____
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	_____
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	_____

Please provide a link, upload the document, and/or provide additional information:

Bertelsmann Code of Conduct: <https://www.bertelsmann.com/media/unternehmen/grundwerte/code-of-conduct-2021/code-of-conduct-en.pdf>

In March 2023, a Human Rights & Fair Working Conditions Policy was adopted by the Bertelsmann Executive Board: <https://www.bertelsmann.com/media/verantwortung/downloads/englisch/bertelsmann-policy-human-rights-and-fair-working-conditions-en.pdf>

If respondent answers 'Yes' in L1, the below question will be displayed for each relevant topic.

L1.1. For each labour rights policy commitment, is it:

Linked to: ILO C155 - Occupational Safety and Health Convention 1981 (No. 155); GRI Disclosures 2-23-c, 2-23-d, 2-23-e (2021)

(Matrix - Select all that apply for each line)

Labour Topics:	Aligned with international labour standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and the value chain (including suppliers, consumers, communities, other business relationships)	Developed in consultation with workers and their representatives	Developed involving labour rights expertise from inside and outside the company	Other (Please provide additional information) <i>[Makes text box mandatory]</i>
Freedom of association and the effective recognition of the right to collective bargaining	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Forced labour	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Child labour	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Safe and healthy working environment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Working conditions (wages, working hours)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please provide additional information: _____

If respondent answers 'Yes' in L1 regarding 'Freedom of association and the effective recognition of the right to collective bargaining,' the below question will be displayed.

L1.2. Does the existing company's policy on freedom of association and collective bargaining:

Linked to: ILO, Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87); GRI Disclosure 2-30 (2021)

(Matrix - Select all that apply for each line)

Labour Topics:	No, and we don't have plans to include it in a policy	No, but we plan to include it in a policy within the next two years	Yes, included in the relevant policy	Not applicable (Please provide additional information)
Reference the respect for the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal and protect workers against acts of antiunion discrimination	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Prohibit any acts of interference in trade unions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate the collective bargaining with the trade union representatives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide trade union representatives with information required for meaningful bargaining in the context of bona fide negotiations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reference the respect for the right of workers to submit grievances without suffering	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: Bertelsmann does not have a specific stand-alone policy on the subject of Freedom of Association and Collective Bargaining but the topic is covered in the Bertelsmann Code of Conduct, the Bertelsmann Supplier Code of Conduct as well as in the Bertelsmann Human Rights & Fair Working Conditions Policy that was adopted in March 2023.

Prevention

L2. In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following labour rights topics? For the user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.

Linked to: GRI Disclosures 3-1-b and 3-3-f (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

(Matrix - Select one answer option per line)

Please select the company's highest level of engagement. Options progress from left to right.

Labour Topics:	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/ impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question	To assess progress in preventing/ mitigating the risks/ impacts in question	To collaborate in the prevention/ mitigation of the risks/ impacts in question	Other (Please provide additional information) [Makes text box mandatory]
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

L3. What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with this labour rights topic?

For the user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.

Linked to: GRI Disclosure 3-3-d (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

(Matrix - Select all that apply for each line)

Labour Topics:	Provided internal training/ capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective Action with peers or other stakeholders, in particular workers' organizations, to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information) [Makes text box mandatory]	No action within reporting period
Freedom of association and the effective recognition of the right to collective bargaining	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Forced labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Child labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: Other: Bertelsmann has established an ESG Program (2021-2023) for its ESG priorities (creative/journalistic independence & freedom of expression; content responsibility; fair working conditions; diversity, equity & inclusion; health & well-being; learning; responsibility in the supply chain; and climate change). The Bertelsmann ESG Program (2021–2023) with its more than 150 group-wide measures, is currently being implemented; progress is regularly monitored. It also includes a Human Rights & Fair Working Conditions Policy that was adopted by the Executive Board in March 2023.

L4. Who receives training for the following labour rights topics? For the user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.
 Linked to: GRI Disclosure 3-3-d (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)
 (Matrix - Select all that apply for each line)

Labour Topics:	No training provided	Select employees	All employees	Contractors	Direct suppliers of the organization	Indirect suppliers of the organization	Other – such as partners, clients, etc.
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

L5. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following labour rights topics? For the user, the “Working conditions (wages, working hours)” option would be visible only if selected in HR1.

Linked to: GRI Disclosure 3-3-e (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

(Matrix - Select one answer option per line)

Please select the company’s highest level of engagement. Options progress from left to right.

Labour Topics:	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)	Other (Please provide additional information) <i>[Makes text box mandatory]</i>
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: Targets / goals that were adopted as part of the Bertelsmann ESG Program (2021- 2023) that Bertelsmann has established for its ESG priorities (creative/journalistic independence & freedom of expression; content responsibility; fair working conditions; diversity, equity & inclusion; health & well-being; learning; responsibility in the supply chain; and climate change). The Bertelsmann ESG Program (2021–2023) with its more than 150 group-wide measures, is currently being implemented; progress is regularly monitored. It also includes a Human Rights & Fair Working Conditions Policy that was adopted by the Executive Board in March 2023.

Performance

L6. Do(es) the existing collective bargaining agreement(s) provide(s) more favourable rights than those provided in legislation, where appropriate?

(Select all that apply)

- ☐ No
- ☒ Yes, by providing more favourable conditions related to wages
- ☒ Yes, by providing more favourable conditions related to working hours
- ☒ Yes, by providing more favourable conditions related to health coverage and/or sick leave
- ☒ Yes, by providing additional rights not otherwise provided (Please provide additional information) [Makes text box mandatory]
- ☒ There is (are) no existing collective bargaining agreement(s)

Please provide additional information: Bertelsmann is a very decentralized organisation with many different business models and companies. Therefore, a uniform answer to this question is not possible and the situation between the different divisions and companies varies depending on the market and the location.

L7. In the course of the reporting period, what was the percentage of women in managerial positions? (%)

Linked to: ISAR C.1.1

(Matrix - Text Box with option for Unknown or N/A)

	Percent women (%)	Unknown
Managerial position	35.5%	<input type="radio"/>

Please provide additional information: Bertelsmann distinguishes between top management and senior management. In FY 2022, 35% of top management and 36% of senior management were women.

L8. What was the average ratio of the basic salary and remuneration of women to men (comparing jobs of equal value) during the reporting period?

Linked to: GRI Disclosure 405-2 (2016)
(Matrix - Text Box with option for Unknown or N/A)

	Salary ratio (%)	Unknown	Choose to not disclose [Makes text box mandatory]
Women/Men (%)	<input type="text"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: Bertelsmann is a very decentralized organisation with many different business models and companies. Therefore, a uniform answer to this question is not possible.

L9. In the course of the reporting period, how frequently were workers injured (injuries per hour worked)?

Linked to: ISAR C.3.2; GRI Disclosure 403-9 (2018)
(Matrix - Text Box with option for Unknown or N/A)

	Frequency of injury	Unknown	Choose to not disclose [Makes text box mandatory]
Frequency of injury	<input type="text"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: Due to the decentralized organizational occupational health and safety structures, this data is not available in an aggregated form at the Corporate level.

L10. In the course of the reporting period, what was the company's incident rate (injuries per worker)?

Linked to: ISAR C.3.2; GRI Disclosure 403-9 (2018)
(Matrix - Text Box with option for Unknown or N/A)

	Incident rate	Unknown	Choose to not disclose [Makes text box mandatory]
Incident rate	<input type="text"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: Due to the decentralized organizational occupational health and safety structures, this data is not available in an aggregated form at the Corporate level.

Response and Reporting

L11. In the course of the reporting period, has the company been involved in providing or enabling remedy if it has caused or contributed to the adverse impact associated with the following labour rights topics? For the user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.

Linked to: 'GRI Disclosure 3-3-d-ii (2021)' for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

(Matrix - Select one answer option per line)

Labour Topics:	No remedy provided/enabled	Yes, remedy provided/enabled	No adverse impact identified or caused	Choose to not disclose [Makes text box mandatory]
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Forced labour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Child labour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Safe and healthy working environment (also in note)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information:

Actual and/or suspected infringements like the ones mentioned in the table can be reported by Bertelsmann employees and third parties by using channels of the existing compliance management system. Information on the options and the procedure applicable to reporting incidents can be viewed on Bertelsmann website: integrity.bertelsmann.com. An investigation is initiated for each compliance case reported, based on a defined procedure in line with the Executive Board's guideline for dealing with compliance violations, with the aim of fully clarifying each case. If Bertelsmann learns of actual and/or suspected human rights violations at business partners, the company contacts those responsible and takes the necessary remedial action.

L12. Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to take to implement the labour principles, including goals set and any challenges faced and actions taken towards prevention and/or remediation.

Linked to: GRI Disclosures 3-3-c and 3-3-d (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

(Text Box)

Bertelsmann has established an ESG Program (2021-2023) for its ESG priorities (creative/journalistic independence & freedom of expression; content responsibility; fair working conditions; diversity, equity & inclusion; health & well-being; learning; responsibility in the supply chain; and climate change). The Bertelsmann ESG Program (2021-2023) with its more than 150 group-wide measures, is currently being implemented; progress is regularly monitored. It also includes a Human Rights & Fair Working Conditions Policy that was adopted by the Executive Board in March 2023.

ENVIRONMENT

Commitment

E1. Does the company have a policy commitment on the following environmental topics?

Linked to: CDP C4.1 2022, CDP F6.1 2022, CDP W6.1 2022, GRI Disclosure 3-3-c (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016)
(Matrix - Select one answer option per line)

Environmental Topics:	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy [Prompts E1.1]	Not applicable (Please provide additional information) [Makes text box mandatory]	Year policy was last updated (YYYY)
Climate change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	_____
Water	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	_____
Oceans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	_____
Forests/biodiversity/land use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	_____
Air pollution	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	_____
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	_____
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	_____

Please provide a link, upload the document, and/or provide additional information: The Bertelsmann Energy & Climate Policy, the Bertelsmann Environmental Policy and the Bertelsmann Paper Policy are currently being revised.

If respondent answers 'Yes' in E1, the below question will be displayed for each relevant topic.

E1.1. For each environmental policy commitment, is it:

Linked to: CDP C4.1 2022, CDP F6.1 2022, CDP W6.1 2022; GRI Disclosures 2-23-c, 2-23-d, 2-23-e (2021)

(Matrix - Select all that apply for each line)

Environmental Topics:	Aligned with international environmental standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and the value chain (including suppliers, consumers, communities, other business relationships)	Developed involving environmental expertise from inside and outside the company	Other (Please provide additional information) <i>[Makes text box mandatory]</i>
Climate change	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/biodiversity/land use	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: Bertelsmann has a Supplier Code of Conduct that includes environmental aspects and is applied to the value chain. (<https://www.bertelsmann.com/media/verantwortung/downloads/englisch/supplier-code-of-conduct-en.pdf>)

The Bertelsmann Energy & Climate Policy, the Bertelsmann Environmental Policy and the Bertelsmann Paper Policy are currently being revised.

Prevention

E2. In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following environmental topics?

Linked to: GRI Disclosures 3-1-b and 3-3-f (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016) (Matrix - Select one answer option per line)

Please select the company's highest level of engagement. Options progress from left to right.

Environmental Topics:	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent/mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question	Other (Please provide additional information) [Makes text box mandatory]
Climate change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/biodiversity/land use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information:

Bertelsmann is part of various CSR initiatives such as the Responsible Media Forum (UK) and econsense (Germany) to interact with relevant stakeholders. These discussions include topics of climate and energy. With regard to forests and biodiversity the Bertelsmann publishing businesses interacted with their suppliers. In addition, employee mobility surveys were sent out in several Bertelsmann locations to understand the need of employees in terms of sustainable commuting, in 2022.

E3. What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with these environmental topics?

Linked to: GRI Disclosure 3-3-d (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-iv (2016)
(Matrix - Select all that apply for each line)

Environmental Topics:	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective Action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information) [Makes text box mandatory]	No action within reporting period
Climate change	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Forests/biodiversity/land use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information:

As part of the Bertelsmann ESG Program (2021-2023), Bertelsmann defined further strategic objectives and developed respective measures. These objectives include strengthening the governance for climate and environmental protection and further developing environmental planning and reporting. In addition, the company intends to increase the share of renewable energies (green electricity, photovoltaics), implement new mobility concepts, advance energy efficiency, implement "Green IT," and the training of employees. With regard to forests and biodiversity, the Bertelsmann publishing businesses interacted with their suppliers. Key suppliers were asked to disclose environmentally related data and to set emission reduction targets.

E4. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following environmental topics?

Linked to: GRI Disclosure 3-3-e (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)
(Matrix - Select one answer option per line)

Please select the company's highest level of engagement. Options progress from left to right.

Environmental Topics:	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only) [Prompts E4.1; E4.2]	Set annual targets/goals, track progress over time (internal and external programmes) [Prompts E4.1; E4.2]	Other (Please provide additional information) [Makes text box mandatory]
Climate change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/biodiversity/land use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information:

Bertelsmann is pursuing the reduction target of cutting absolute greenhouse gas emissions by 50 percent by 2030 compared to 2018.

The reduction target was validated by the Science Based Targets Initiative (SBTi) in March 2021. The SBTi confirmed that Bertelsmann's climate target is ambitious and in line with the 1.5° target of the Paris Climate Agreement.

As the most important lever for reducing its own emissions, Bertelsmann pursues the target of procuring 100 percent of the electricity purchased from renewable sources. Bertelsmann strives to raise the share of recycled paper and paper from certified, sustainable forestry to 100 percent. Recycled paper as well as paper of certified origin, complying with FSC®, PEFC™, SFI® requirements or comparable standards, are regarded as sustainably sourced paper.

If respondent answers in E4 that they set annual targets, the below question will be displayed for each relevant topic.

E4.1. For each environmental topic for which the company sets timebound goals/targets, what kind of targets has the company set?

Linked to: CDP F6.1 2022; GRI Disclosure 3-3-e (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)

(Matrix - Text box for each line)

Description of targets (e.g., what is the target, absolute vs. intensity, externally verified, on track, etc.)

Climate change Bertelsmann aspires to become climate neutral by 2030. The greenhouse gas emissions generated at Bertelsmann's own sites, by the business travel of its employees, and by the manufacture of its own products are to be significantly reduced by 2030. The remaining emissions are to be offset with voluntary climate protection measures. At the same time, Bertelsmann is pursuing the reduction target of cutting absolute greenhouse gas emissions by 50 percent by 2030 compared to 2018. In addition to emissions from sites, employees and the company's own products, the latter also include all other accounted emissions. The reduction target was validated by the Science Based Targets Initiative (SBTi) in March 2021. The SBTi confirmed that Bertelsmann's climate target is ambitious and in line with the 1.5° target of the Paris Climate Agreement.

Water

Oceans

Forests/biodiversity/land use Bertelsmann strives to raise the share of recycled paper and paper from certified, sustainable forestry to 100 percent. Recycled paper as well as paper of certified origin, complying with FSC®, PEFC™, SFI® requirements or comparable standards, are regarded as sustainably sourced paper.

Air pollution

Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)

Energy & resource use Bertelsmann pursues the target of procuring 100 percent of the electricity purchased from renewable sources.

Please provide additional information: _____

If respondent answers in E4 that they set annual targets, the below question will be displayed for each relevant topic.

E4.2. For each environmental topic in which the company sets timebound goals/targets, how is progress against target/goal tracked?

Linked to: GRI Disclosure 3-3-e (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)
(Matrix - Select all that apply for each line)

Environmental Topics:	Progress is reviewed against goals annually or more frequently	Progress is reported internally to the most senior level	Progress is reported externally	Other (Please provide additional information) [Makes text box mandatory]
Climate change	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/biodiversity/land use	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information:

The "Bertelsmann Climate Neutral 2030" climate strategy prioritizes measures to avoid and reduce emissions. Individual targets were established for the media and services divisions as well as for the education division and relevant measures were identified. The achievement of these division-specific targets is discussed as part of annual strategy meetings between Executive Board members and divisional CEOs, based on uniform Group-wide milestones and indicators. As part of its mandatory Non-Financial Statement in the Combined Management Report as well as its voluntary environmental report with reference to GRI 300, Bertelsmann reports annually on its sustainability progress.

E5. In the course of the reporting period, has the company been involved in providing or enabling remedy for any impacts associated with the following environmental topic(s)?

*Linked to: GRI Disclosure 3-3-d-ii (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)
(Matrix - Select one answer option per line)*

Environmental Topics:	Yes, remedy provided/enabled	No remedy provided/enabled	No adverse impact identified or caused	Choose to not disclose
Climate change	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/biodiversity/land use	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information:

Unavoidable emissions are offset via a voluntary climate-protection project. Projects are carefully selected by Bertelsmann on the basis of defined criteria. For example, the projects must have a long-term orientation and ensure as best as possible that compensated CO2 emissions are not returned to the atmosphere. In the 2022 financial year, certificates for more than 40,000 tons were offset by a reforestation project in Brazil.

Climate Action

E6. What were the company’s gross Scope 1 and Scope 2 greenhouse gas emissions for the reporting period?

Linked to: CDP C6.1 2022, CDP C6.3 2022; GRI Disclosures 305-1, 305-2 (2016); ISAR B.3.1; ISAR B.3.2
(Matrix - Select one answer option per line)

Measured Total Emissions (tCO2e)		We did not measure our gross emissions [Please explain in the mandatory text box]
Scope 1 emissions	191.100	<input checked="" type="radio"/>
Scope 2 emissions	70.700	<input checked="" type="radio"/>

Please provide additional information: The sum of direct (Scope 1) and energy-related indirect (Scope 2) greenhouse gas emissions in the 2022 fiscal year amounted to 261,800 tons of CO2e, a decrease of 23 percent compared to the previous year (340,200 tons of CO2e). Scope 1 emissions at Bertelsmann stem primarily from the combustion of fossil fuels such as natural gas. These emissions fell by 12 percent in the 2022 fiscal year, in particular due to declines in business at Bertelsmann Printing Group. Scope 2 emissions from the purchase of electricity and heat were reduced by 43 percent, due to an increased use of green electricity.

E7. What were the company’s gross Scope 3 global greenhouse gas (GHG) emissions for the reporting period?

Linked to: CDP C6.5 2022; GRI Disclosure 305-3 (2016)
(Multiple Choice- Select one)

- ☒ We fully measured Scope 3 GHG emissions [Please input the measured tCO2e in the text box below]
- ☐ We partially measured Scope 3 GHG emissions [Please input the measured tCO2e in the text box below] [Prompts E7.1]
- ☐ We did not measure Scope 3 GHG emissions

Please provide measured tCO2e and/or additional information: 1.645.000

Within the Scope 3 categories, indirect greenhouse gas emissions from materials and services accounted for the largest share at 70 percent in the 2022 fiscal year. This included, among other things, emissions from paper procurement, printing materials used, external services, and the production of TV content. Downstream transports from the distribution of products accounted for just over 10 percent of Scope 3 emissions, while upstream transports accounted for 8 percent. Other sources include upstream energy-related emissions (outside Scope 1 and Scope 2), such as commuting by employees, business travel, and emissions from waste logistics and the end-of-life cycle of Bertelsmann’s own products. All other Scope 3 categories are not relevant for Bertelsmann.

If respondent answers 'Partial' for Scope 3 emissions in E7, the below question will be displayed.

E7.1. Which Scope 3 categories are included in the organization's Scope 3 emissions calculation?

Linked to: GRI Disclosure 305-3 (2016); CDP C6.5 2022

(Select all that apply)

- ☐ Purchased goods and services
- ☐ Capital goods
- ☐ Fuel- and energy-related activities
- ☐ Upstream transportation and distribution
- ☐ Waste generated in operations
- ☐ Business travel
- ☐ Employee commuting
- ☐ Upstream leased assets
- ☐ Downstream transportation and distribution
- ☐ Processing of sold products
- ☐ Use of sold products
- ☐ End-of-life treatment of sold products
- ☐ Downstream leased assets
- ☐ Franchises
- ☐ Investments
- ☐ Other - upstream
- ☐ Other - downstream

Please provide additional information: _____

E8. What percentage of the company’s revenue was invested in R&D of low-carbon products/services during this reporting period?

Linked to: CDP C4.3c 2022; CDP4.2b 2022; (partially linked to) ISAR A.3.3
(Matrix - Text Box with option for Unknown or N/A)

	Percent of revenue (%)	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
R&D for low-carbon products/services	<input type="text"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: Bertelsmann is a decentrally organized media, service and education company with several different businesses and thus does not have a conventional research and development department. Research and development activities are decentralized within the businesses. Bertelsmann views the decentralized company’s own innovative power as particularly important for business development.

E9. Has the organization acted to support climate change adaptation and resilience?

Linked to: GRI Disclosure 201-2-a-iv (2016)
(Select all that apply)

- ☐ We have taken action to increase organization-wide resilience to climate change
- ☐ We have taken action to increase resilience in our supply chains
- ☐ We have taken action to increase resilience in the communities in which we operate
- ☐ We have provided funding for climate change adaptation and resilience initiatives and projects
- ☐ We have not taken actions to build climate change resilience in the reporting period

☒ Unknown Bertelsmann is a decentrally organized media, services and education company with many different businesses and business models. Therefore, Bertelsmann does not have Group-wide activities and reporting for climate change adaptation. The responsibility for climate adaptation is decentralized, with local sites and companies taking the lead in implementing adaptation measures and resilience strategies.

Energy/Resource Use

E10. Please report the company’s renewable energy consumption as a percentage of total energy consumption in the reporting period.

Linked to: ISAR B.5.1; GRI Disclosure 302-1 (2016)
(Matrix - Text Box with option for Unknown)

	% of total energy consumption	Unknown
Renewable energy consumption as % of total energy consumption:	<input type="text" value="25"/>	<input type="radio"/>

Please provide additional information: Renewable energy consumption includes use of biogas and biomass for heating, consumption of own energy generation from solar sources, purchased renewable electricity from the grid and renewable heat from district heat or from the landlord.

Technology

E11. What percent of the company’s revenue came from low-carbon products/services during this reporting period?

Linked to: SASB CG-MR-410a.1a; WEF Common Metrics
(Matrix - Text Boxes with option for Unknown or N/A)

	Percent of total revenue (%)	Description of products/services included (e.g., relevant certification)	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Low-carbon products and services/total revenue for the reporting period			<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information:

The definitions of low carbon products for example by the European Union's Taxonomy are currently not applicable to Bertelsmann as a media, services and education company. With regards to the EU Taxonomy, Bertelsmann reports 7 Mio. of revenue from data-driven solutions for GHG reductions from the IT business of Arvato.

Additional Topic-specific Questions

E12. Which of the following has the company identified as material environmental topics connected with its operations and/or value chain (e.g., based on the most severe actual or potential negative impacts on people and/or the environment)?

Linked to: GRI Disclosure 3-2 (2021)
(Select all that apply)

- ☐ Water [Prompts Questions E13; E14]
- ☐ Forests/Biodiversity/Land use [Prompts Questions E15-E17]
- ☐ Air pollution [Prompts Question E18]
- ☐ Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.) [Prompts Questions E19-E21]
- ☒ None of the topics have been identified as material by the company

Please provide additional information:

With regard to environmental topics, climate change is the only topic which has been identified as material on a group-wide basis. However, the topics "Water" and "Waste" are covered by the ESG reporting of Bertelsmann.

Additional Topic-specific Questions: Water

E13. Please provide details regarding the company’s water withdrawal and consumption (own operations) during the reporting period.
Linked to: ISAR B.1.3; CDP W1.2b 2022, CDP W1.2d 2022; SASB CG-HP-140a.1; GRI Disclosures 303-3, 303-5 (2018)
(Matrix - Text Boxes with option for Unknown or N/A)

Water withdrawal (volume of water in megaliters):		Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Total	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
BY SOURCE			
Fresh surface water:	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Groundwater:	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Brackish surface water/seawater:	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Produced water:	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Third-party water:	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Percentage of water withdrawn in regions with high or extremely high water stress(%):	<input type="text"/>	<input type="radio"/>	<input type="radio"/>

Water consumption (volume of water in megaliters):

Unknown

Not applicable (Please provide additional information)
[Makes text box mandatory]

Total

☐☐

BY SOURCE

Fresh surface water:

☐☐

Groundwater:

☐☐

Brackish surface water/seawater:

☐☐

Produced water:

☐☐

Third-party water:

☐☐

Percentage of water consumed in regions with high or extremely high water stress (%):

☐☐

Please provide additional information: _____

E14. Please provide details about the company’s water intensity of products in regions with high or extremely high water stress.

Linked to: CDP 1.3 2022; CDP 1.3a 2022
(Matrix - Text Boxes with option for Unknown or N/A)

	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
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Water intensity of products (cubic meter/\$ OR cubic meter/product type):	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
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Please provide additional information:

Additional Topic-specific Questions: Forests, Biodiversity, and Land Use

E15. Please report the number and area (in hectares) of sites owned, leased, or managed by the company in or adjacent to protected areas and/or key biodiversity areas (KBA).

Linked to: GRI Disclosure 304-1 (2016); ISAR B6.1, WEF Common Metrics
(Matrix - Text Boxes with option for Unknown or N/A)

	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
--	---------	--

Sites	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Hectares	<input type="text"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information:

E16. What area (in hectares) of natural ecosystems was converted during the reporting period in areas owned, leased, or managed by the company?

Linked to: CDP F1.3 2022; GRI Disclosure 304-1 (2016)

(Matrix - Text Boxes with option for Unknown or N/A)

	Area (hectares)	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Conversion of natural ecosystems	<hr/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information:

E17. Is the company supporting or implementing project(s) focused on ecosystem restoration and protection?

Linked to: CDP F6.11 2022; GRI Disclosure 304-3 (2016)

(Matrix - Select one answer option per line + text box)

	No	No, but we plan to within the next 2 years	Yes	If yes, project(s) area to date (hectares)
Forest ecosystem restoration	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<hr/> 287 ha
Other ecosystem restoration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<hr/>
Reforestation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<hr/> 1,055 ha
Natural regeneration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<hr/>
Agroforestry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<hr/>
Set-aside land	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<hr/>
Biodiversity offsetting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<hr/>
Other (Please provide additional information)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<hr/>

Please provide additional information: Unavoidable emissions are offset via a voluntary climate-protection project. Further projects are to be added in the years ahead. Projects are carefully selected on the basis of defined criteria. For example, the projects must have a long-term orientation and ensure as best as possible that compensated CO2 emissions are not returned to the atmosphere. In the 2022 financial year, certificates for more than 40,000 tons were offset by a reforestation project in Brazil.

Additional Topic-specific Questions: Air Pollution

E18. Where applicable, please report the company’s emissions of the following pollutants during the reporting period.

Linked to: GRI Disclosure 305-7 (2016); ISAR B.1.4

(Matrix - Text Box with option for Unknown or N/A)

Air pollutant:	Emissions (t)	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
NO _x	<div></div>	<div></div>	<div></div>
SO _x	<div></div>	<div></div>	<div></div>
Volatile organic compounds (VOCs)	<div></div>	<div></div>	<div></div>
Hazardous air pollutants (HAPs)	<div></div>	<div></div>	<div></div>
Particulate matter (PM ₁₀)	<div></div>	<div></div>	<div></div>
Persistent organic pollutants (POPs)	<div></div>	<div></div>	<div></div>
Other (Please provide additional information)	<div></div>	<div></div>	<div></div>

Please provide additional information:

Additional Topic-specific Questions: Waste

E19. In metric tonnes, please report the company’s total weight of waste generated during the reporting period.
Linked to: GRI Disclosure 306-3 (2020); (partially linked to) ISAR B.2.1
(Matrix - Text Box with option for Unknown or N/A)

	Waste generated (t)	Unknown	Not applicable (Please provide additional information) <i>[Makes text box mandatory]</i>
Solid waste	<input type="text"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information:

E20. Please report the percentage of the company’s waste that was hazardous waste (e.g., hazardous waste ratio) during the reporting period.
Linked to: GRI Disclosures 306-4, 306-5 (2020); ISAR B.2.3
(Matrix - Text Box with option for Unknown or N/A)

	Hazardous waste ratio (%)	Unknown	Not applicable (Please provide additional information) <i>[Makes text box mandatory]</i>
Hazardous waste	<input type="text"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information:

E21. Please report the company’s estimated metric tonnes of single-use plastic consumed wherever material along the value chain during the reporting period.
 Linked to: WEF Common Metrics
 (Matrix - Text Box with option for Unknown or N/A)

	Single-use plastic (t)	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Single-use plastics		<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Overall Environment

E22. Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to take to implement the environment principles, including goals set and any challenges faced and actions taken towards prevention and/or remediation.
 Linked to: GRI Disclosures 3-3-c and 3-3-d (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016)
 (Text Box)

As the most important lever for reducing its own emissions, Bertelsmann pursues the target of procuring 100 percent of the electricity purchased from renewable sources. In 2022, the share of green electricity increased to 76 percent from 44 percent in the previous year. In addition, electricity generation from solar power increased from 10,800 MWh in 2021 to 16,900 MWh in 2022.

ANTI-CORRUPTION

Commitment

AC1. Does the company have an anti-corruption compliance programme?

Linked to: GRI Disclosure 3-3-c (2021) for the topic GRI 205 (2016)

(Radial - Select One)

☐ No, it is not an immediate business priority

☐ No, but we plan to within the next two years

☒ Yes [Prompts AC1.1]

Bertelsmann has implemented an anti-corruption programme based on the Executive Board Guideline on Anti-Corruption & Integrity. This particularly encompasses training and communication initiatives as well as extensive speak-up procedures.

Please provide additional information: _____

If respondent answers 'Yes' in AC1, the below question will be displayed.

AC1.1. If yes, in what year was this programme last reviewed? (YYYY)

2021

Please provide additional information: Internal review. _____

AC2. Does your company have policies and recommendations for employees on how to act in case of doubt and/or in situations that may represent a conflict of interest, e.g., with regard to gifts and hospitality, donations, sponsorship, or interactions with public officials?

(Radial - Select One)

☐ No, and we have no plans to develop them

☐ No, but we plan to within the next two years

☒ Yes, included within a broader policy or as a standalone policy

Please provide a link, upload the document, and/or provide additional information:

Bertelsmann Code of Conduct:

<https://www.bertelsmann.de/media/unternehmen/grundwerte/code-of-conduct-2021/code-of-conduct-en.pdf>

Bertelsmann Executive Board Guideline on Donations, Sponsorships and Memberships (internal document)

Prevention

AC3. Who receives training on anti-corruption and integrity?
Linked to: WEF Common Metrics; GRI Disclosure 205-2 (2016)
(Select all that apply)

- ☐ No training provided
- ☒ Select employees [Prompts AC3.1]
- ☐ All employees [Prompts AC3.1]
- ☐ Contractors [Prompts AC3.1]
- ☐ Direct suppliers of the organization [Prompts AC3.1]
- ☐ Indirect suppliers of the organization [Prompts AC3.1]
- ☐ Other – such as partners, clients, etc. [Prompts AC3.1]

Please provide additional information: With respect to the Executive Board Guideline on Anti-Corruption & Integrity, employees working in anti-corruption affine positions / departments are nominated to participate in on-site training events and/or e-learning courses. This ensures that all relevant employees are aware of all applicable (statutory / legal / regulatory) compliance requirements that are essential for their daily business.

If respondent answers any option in AC3 besides 'No training provided', the below question will be displayed for each chosen category. For the user, options would be visible only for the categories selected in AC3.

AC3.1. How often is such training provided?
(Matrix - Select one answer option per line)

	One time only	Every two or more years	Every year	We do not collect this data
Select employees	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
All employees	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contractors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct suppliers of the organization	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Indirect suppliers of the organization	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other – such as partners, clients, etc.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

AC4. Does the company monitor its anti-corruption compliance programme?
 Linked to: GRI Disclosure 3-3-e (2021) for the topic GRI 205 (2016); SDG Action Manager - SDG 16: Peace, Justice, and Strong Institutions
 (Select all that apply)

- ☐ No, we do not monitor the anti-corruption compliance programme (Please provide additional information) *[Makes text box mandatory]*
- ☐ Review topics on ad hoc basis
- ☒ Yes, through internal employee self-evaluations
- ☒ Yes, through automated controls monitoring
- ☐ Yes, through external independent monitoring
- ☒ Yes, through other mechanisms (Please provide additional information) *[Makes text box mandatory]*

Please provide additional information: Yearly evaluation of Group-wide Compliance Programme in Bertelsmann Corporate Compliance Committee and reviews by Corporate Audit.

Performance

AC5. Please report the company’s total number and nature of incidents of corruption during the reporting year.
 Linked to: GRI Disclosure 205-3 (2016); WEF Common Metrics ; ISAR D.2.1
 (Matrix - Text Boxes with option for Unknown or N/A)

	Number of incident(s)	Nature of incident(s)	Unknown	Choose to not disclose
Confirmed during the current year, but related to previous years	_____	_____	<input type="radio"/>	<input checked="" type="radio"/>
Confirmed during the current year, and related to this year	_____	_____	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: _____

Response and Reporting

AC6. Within the reporting period, what measures has the company taken to address suspected incidents of corruption independently or in response to a dispute or investigation by a government regulator?

Linked to: GRI Disclosure 3-3-d (2021) for the topic GRI 205 (2016); Reporting Guidance on the 10th Principle Against Anti-corruption - B3

(Select all that apply)

- ☒ Initial case assessment
- ☐ Internal investigation
- ☐ Review by risk/ethics committee
- ☐ Review by board of directors
- ☐ External audit/review
- ☐ Other (Please provide additional information) *[Makes text box mandatory]*
- ☐ Not applicable/no incidents in the reporting period

Please provide additional information: _____

AC7. Does your company engage in collective action against corruption?

Linked to: GRI Disclosure 3-3-d (2021) for the topic GRI 205 (2016)

(Radial - Select One)

- ☒ No, it is not an immediate business priority
- ☐ No, but we plan to within the next two years
- ☐ Yes (Please explain) *[Makes text box mandatory]*

Please provide additional information: _____

AC8. Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to implement the anti-corruption principle, including goals set and any challenges faced and actions taken towards prevention and/or remediation.

Linked to: GRI Disclosures 3-3-c and 3-3-d (2021) for the topic GRI 205 (2016)

(Text Box)

New online compliance training 'Preventing Corruption' covering several anti-corruption matters (inter alia behaviour towards public officials) were developed. The training is available to Bertelsmann employees since July 17th, 2023. Such training is continuously assigned locally to nominated employees and respective communication is being implemented in the Bertelsmann Group.