

GRI Content Index 2015

Bertelsmann Corporate Responsibility Information
in accordance with the Global Reporting Initiative (GRI) Guidelines

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Since 2011, Bertelsmann has based its Corporate Responsibility reporting on the international guidelines of the Global Reporting Initiative (GRI), the worldwide key voluntary guideline for sustainability reporting at companies and organizations.

The Bertelsmann GRI Content Index consists of a table with a systematic presentation of the standard disclosures for the 2015 financial year in accordance with the GRI G4 Standard (reporting option “core”), thereby providing a profile of the company and its economic, environmental and social performance. There reported aspects were selected based on a relevance analysis of corporate responsibility topics at Bertelsmann.

The GRI Content Index contains brief information on each standard disclosure, GRI aspect, and indicator, supplemented with interactive hyperlinks that lead to further information, facts and figures about the responsibility efforts of Bertelsmann and its divisions. The table also contains sector-specific supplementary information and indicators in conformity with the “Media Sector Disclosures” of the GRI. This supplementary information is identified with the abbreviation “MSD.”

The Bertelsmann GRI Content Index also provides information about how the company’s sustainability engagement reflects the principles of the United Nations Global Compact (UNGC). A separate column in the table highlights the relevant reporting content for each principle. It therefore serves to fulfill Bertelsmann’s obligation of submitting an annual Communication on Progress as a UNGC participant.



Profile Indicators

GRI Indicator UNGC

1. Strategy and Analysis

G4-1 Statement from the organization’s most senior decision-maker

“Bertelsmann has changed over the years. We have become a faster growing, more digital and more international company. Alongside media and services, education has become the third pillar of our business. And we have established a new corporate structure with eight divisions, reflecting the strategic progress made in our work.

One thing, however, has not changed: As a company of creatives, we are continually developing new products and services. Day after day, around the clock, and all over the world, we reach more than 600 million people whose expectations are as high as the standards we set for ourselves.

These high standards determine our business conduct as well – toward our employees, our customers, and other stakeholders. (...)

Like our corporate strategy, our engagement is clearly and systematically focused and defined in cooperation with Bertelsmann’s stakeholders. On the following pages, we present these key areas of our corporate responsibility efforts. They are just as much a part of Bertelsmann as our company’s commercial offerings, and they are just as diverse.

GRI	Indicator	UNGC
	(...). As a long-standing participant in the UN Global Compact, Bertelsmann fulfills its commitment by submitting an annual Communication on Progress through the publication of this report. (...).“ Thomas Rabe, Chairman and Chief Executive Officer of Bertelsmann CR Magazine, p. 3: Editorial	

2. Organizational Profile

G4-3	Name of the company Bertelsmann SE & Co. KGaA
G4-4	Primary brands, products and services Bertelsmann is a media, services and education company that operates in about 50 countries around the world. It includes the broadcaster RTL Group, the trade book publisher Penguin Random House, the magazine publisher Gruner + Jahr, the music company BMG, the service provider Arvato, the Bertelsmann Printing Group, the Bertelsmann Education Group, and Bertelsmann Investments, an international network of funds. The company has 117,000 employees and generated revenues of 17.1 billion euros in the 2015 financial year. Bertelsmann stands for creativity and entrepreneurship. This combination promotes first-class media content and innovative service solutions that inspire customers around the world. Company Profile Company presentation (status October 2016)
G4-5	Location of the headquarters Gütersloh, Germany
G4-6	Countries with major operations Bertelsmann is a media, services and education company that operates in about 50 countries around the world. Its geographic core markets are Western Europe – in particular, Germany, France and the United Kingdom – and the United States. In addition, Bertelsmann is strengthening its involvement in growth markets such as China, India, and Brazil. Locations Annual Report 2015 (Financial Information), p. 5
G4-7	Nature of ownership and legal form Bertelsmann SE & Co. KGaA is an unlisted partnership limited by shares. Three foundations (Bertelsmann Stiftung, Reinhard Mohn Stiftung, and BVG-Stiftung) indirectly hold 80.9% of the shares in Bertelsmann SE & Co. KGaA, with the remaining 19.1% held indirectly by the Mohn family. Bertelsmann Verwaltungsgesellschaft (BVG) controls all voting rights at the General Meeting of Bertelsmann SE & Co. KGaA and Bertelsmann Management SE (personally liable general partner). Shareholder Structure

GRI	Indicator	UNGC
G4-8	<p>Markets served</p> <p>Bertelsmann stands for creativity and entrepreneurship. This combination promotes first-class media content and innovative service solutions that inspire customers around the world.</p> <p>Company Profile</p> <p>Annual Report 2015 (Financial Information), p. 5</p> <p>CR Magazine, p. 10: Value Creation at Bertelsmann</p> <p>The geographic core markets are Western Europe – in particular Germany, France and the United Kingdom – and the United States. In addition, Bertelsmann is strengthening its involvement in growth markets such as China, India, and Brazil. See G4-6.</p> <p>Alongside the geographic core markets, the following markets are particularly strategically important from the perspective of the Group:</p> <ol style="list-style-type: none"> 1. European TV advertising markets 2. Physical and digital book market 3. Magazine markets in Germany and France 4. Services markets in the areas of CRM, SCM, Financial Solutions, IT and Digital Marketing 5. Print markets 6. Music publishing markets 7. US education markets in the areas of E-Learning and Online Services for universities 	
G4-9	<p>Scale of the reporting organization</p> <p>In the 2015 financial year, the company's businesses with a total workforce of 117,000 employees generated revenues of €17.1 billion (previous year: €16.7 billion).</p> <p>Other Financial Figures</p> <p>Company presentation (status October 2016), p. 7, 9, 11, 13, 15, 17, 18: Quantity of offered products and services</p> <p>MSD Indicators (Tab "Employees"): Employees by Division</p> <p>MSD Annual Report 2015 (Financial Information), p. 13: Revenues by Category</p>	
G4-10	<p>Breakdown of the workforce by gender and regions</p> <p>At the end of the financial year 2015, the Group had a workforce of 117,249 employees worldwide (previous year: 112,037). Around 53% of the employees were women and 47% were men. Some 77% of the employees had permanent employment contracts and some 23% worked on the basis of fixed-term contracts. In both forms of employment contract, 53% were women and 47% were men. The full-time employment rate within the Group in Germany amounted to 66.2%. This means that 33.8% worked on a part-time basis. A breakdown of these disclosures by further categories is not available.</p> <p>Indicators (Tab "Employees")</p> <p>Bertelsmann operates in businesses which are often subject to short-term order fluctuations. This requires a great deal of flexibility from the company and from its employees. Moreover, in order to be able to provide a continuous stream of high-quality content, products and services, the company also draws on personnel service providers</p>	VI

GRI	Indicator	UNGC
	<p>and employs freelance professionals alongside company employees wherever the assignments are appropriate for this type of involvement.</p> <p>Independent Contractors</p> <p>CR Magazine, p. 44: Is freelance work really fair?</p>	
G4-11	<p data-bbox="240 434 1209 461">Percentage of total employees covered by collective bargaining agreements</p> <p data-bbox="1362 434 1385 461">III</p> <p>The dialog between employees and management is essential to effective partnership and a successful business. Employee participation is alive and well at Bertelsmann – well beyond the extent mandated by law. It requires strong representatives, clear rules and mutual trust. That is why employees and special groups of people such as executives, trainees and people with disabilities have various platforms for exchanging ideas, advancing shared topics, and constructively contributing their concerns to the dialog with the company's management.</p> <p>Bertelsmann creates the corporate ethos and framework conditions throughout the Group necessary for ensuring fair working conditions. The local management is responsible for regulating the working conditions in individual businesses. This background means that there are no aggregated statistics for the percentage of total employees covered by collective bargaining agreements at the level of the Bertelsmann Group.</p>	
G4-12	<p data-bbox="240 981 639 1008">Description of the supply chain</p> <p>Bertelsmann's media businesses are based on producing and acquiring high-quality information and entertainment content – from which books, TV channels, magazines, music products and online services are created. All products are distributed physically or digitally, directly to the consumer or via service providers. Good contacts with creative talents and producers such as journalists, photographers, authors of books, songwriters, performing artists, and TV producers are a key success factor.</p> <p>Service offerings are at the core of the services segment. These services are delivered to the end customers of Bertelsmann's clients. Hardware and standard software are sourced from external suppliers. Our print operations process materials like paper and printing ink to produce media and advertising products for our business customers. Offset, gravure and digital printing machines are used by third-party manufacturers for this purpose. The most important raw material used in our CD, DVD and Blu Ray replication business is polycarbonate plastic.</p> <p>Like Bertelsmann's services businesses, the business models in the education segment are based on the combined deployment of highly qualified employees, their knowledge and skills, and technology.</p> <p>CR Magazine, p. 10f.: Value Creation at Bertelsmann</p> <p>Carbon Footprint, p. 11: Paper Purchasing</p>	
G4-13	<p data-bbox="240 1774 1238 1839">Significant changes during the reporting period regarding the company's size, structure, ownership, or its supply chain</p> <p>In November 2015, Bertelsmann invested further in the expansion of its education activities and significantly increased its investment in the innovative online learning provider Udacity. In December 2015, Bertelsmann expanded the strategic growth area of education and invested in the online education platform HotChalk. With a total transaction volume of € 179 million, Bertelsmann is the largest shareholder.</p>	

GRI	Indicator	UNGC
	<p>On December 18, 2015, Bertelsmann took over the remaining 25.1 percent of the printing group Prinovis from former co-partner Axel Springer. The rationale behind the full takeover of the company is to simplify the corporate structure.</p> <p>Annual Report 2015 (Financial Information), p. 11f.: Significant Events in the Financial Year</p> <p>Since the turn of the year 2015/2016, the strategic transformation of the Bertelsmann Group has been reflected even more prominently in the corporate structure. At the start of the financial year 2016, three additional independent divisions were set up, born of the operating activities of Corporate Investments: BMG, Bertelsmann Education Group and Bertelsmann Investments. Furthermore, on January 1, 2016, the offset and gravure printing activities of the Group were merged in the Bertelsmann Printing Group division.</p> <p>Annual Report 2015 (Image Section): The New Bertelsmann</p>	
G4-14	<p>Implementation of the precautionary principle</p> <p>The purpose of the Bertelsmann Risk Management System (RMS) is the early identification, evaluation and monitoring of internal and external risks.</p> <p>Annual Report 2015 (Financial Information), p. 27ff.: Risk and Opportunities Report</p> <p>The Executive Board established a Compliance Organization and the Ethics & Compliance (E&C) Program in order to guarantee compliance. It monitors this program and guarantees continuous development. The “E&C Feedback Loop” implemented within this framework is effectively based on the following elements: Code of Conduct, compliance guidelines, risk analysis, consulting, communication, training, whistleblower system, investigation of reported ethical breaches, and remediation.</p> <p>Compliance</p> <p>Annual Report 2015 (Financial Information), p. 125f.: Compliance</p> <p>CR Magazine, p. 17: Ethics & Compliance</p>	
G4-15	<p>Externally developed economic, environmental and social charters, principles or other initiatives</p> <p>Since 2008, Bertelsmann has supported the 10 principles of the United Nations Global Compact as an active participant. The company is therefore committed to the goal of promoting continuous and sustainable progress in the areas of labor standards, human rights, environmental protection and anti-corruption, together with its employees, customers and suppliers at its international locations.</p> <p>UN Global Compact</p> <p>CR Magazine p. 16: Guidelines and Partnerships</p>	
G4-16	<p>Memberships of associations and advocacy organizations</p> <p>Bertelsmann has a variety of strategic partnerships and alliances at Group, divisional, and company level. In the area of sustainability and corporate responsibility, Bertelsmann has been a member of Econsense, the forum for sustainable development of the German economy since 2015. Furthermore, Bertelsmann is involved at Group and divisional level in the international Media CSR Forum network.</p> <p>Cooperations</p> <p>CR Magazine p. 16: Guidelines and Partnerships</p>	

3. Identified Material Aspects and Boundaries

G4-17 List of consolidated entities and consolidated financial statements

[Major Subsidiaries and Participations](#)

[Annual Report 2015 \(Financial Information\), p. 49f.: Scope of Consolidation](#)

G4-18 Process for selecting the report content

The information presented is intended to provide employees, customers, suppliers, journalists, investors, and representatives of government agencies and non-government organizations with a transparent and comprehensive overview of how Bertelsmann implements its corporate responsibility. The company bases its reporting on the guidelines (G4) of the Global Reporting Initiative (GRI); this facilitates comparison with other companies' reporting. Bertelsmann also takes into account the indicators in the GRI's Media Sector Disclosures (MSD). Furthermore, Bertelsmann also indicates the reporting content in this GRI Content Index and in other CR publications that relate to the principles of the UN Global Compact (UNGC).

[CR Magazine, p. 4: About our Corporate Responsibility Reporting](#)

An analysis conducted with internal stakeholders in 2014 enabled Bertelsmann to identify the primary social and environmental issues relevant for the Group. Twelve social and environmental topics with more than 30 subtopics were presented to over 130 executives and employee representatives throughout the world to rate on the basis of a 4-point scale. Their relevance for the business was surveyed in the categories of potential for risk, direct financial impact, efficiency and optimization potential, differentiation and growth potential, and future orientation. Stakeholder relevance was assessed in terms of employees, B2B and B2C customers, and optionally other stakeholders.

Seven topics were identified as especially relevant: education, press freedom, fair working conditions, protection of media users and customers, diversity, health, and eco-efficiency.

The GRI Content Index also reports on these topics – in the same way as on the UNGC principles.

[Topics](#)

[CR Magazine, p. 14f.: Corporate Responsibility Topics](#)

G4-19 List of all the material aspects identified

On the relevance assessment of CR topics at Bertelsmann see G4-18.

[CR Magazine, p. 14f.: Corporate Responsibility Topics](#)

CR Topic	GRI Aspects	Boundary / Scope See GRI Implementation Manual p. 34f.
Education	<ul style="list-style-type: none"> - Training and Education - Media Literacy 	<ul style="list-style-type: none"> - Inside the company - Inside, outside the company
Press Freedom	<ul style="list-style-type: none"> - Freedom of Expression and Opinion - Public Policy - Production of Content 	<ul style="list-style-type: none"> - Inside, outside - Inside - Inside, outside
Fair Working Conditions	<ul style="list-style-type: none"> - Economic Performance - Employment - Labor/Management Relations - Freedom of Association and Collective Bargaining - Child Labor - Forced or Compulsory Labor 	<ul style="list-style-type: none"> - Inside - Inside - Inside - Outside - Outside - Outside
Protection of Media Users and Customers	<ul style="list-style-type: none"> - Product and Service Labeling - Marketing Communications - Customer Privacy - Content Dissemination 	<ul style="list-style-type: none"> - Inside, outside - Inside, outside - Inside - Inside
Diversity	<ul style="list-style-type: none"> - Diversity and Equal Opportunity - Equal Remuneration for Women and Men - Non-discrimination 	<ul style="list-style-type: none"> - Inside, outside - Inside - Inside
Health	<ul style="list-style-type: none"> - Occupational Health and Safety 	<ul style="list-style-type: none"> - Inside
Eco-efficiency	<ul style="list-style-type: none"> - Materials - Energy - Water - Emissions - Effluents and Waste 	<ul style="list-style-type: none"> - Outside - Inside, outside - Inside, outside - Inside, outside - Inside, outside
Business Ethics & Society	<ul style="list-style-type: none"> - Protection of Intellectual Property - Anti-corruption - Anti-competitive Behavior - Local Communities 	<ul style="list-style-type: none"> - Inside, outside - Inside, outside - Inside - Inside

GRI	Indicator	UNGC
G4-20	Aspect Boundaries within the organization See G4-19.	
G4-21	Aspect Boundaries outside the organization See G4-19.	
G4-22	Effect of any restatements of information provided in previous reports, and the reasons for such changes When key figures for human resources were surveyed, there were changes for the following disclosures: number of employees / headcount and full-time employees (adjustments to definitions); employee turnover (owing to adjustments of definitions relating to headcount; see G4-LA1); basic and advanced training hours (data source was adjusted: new HR IT platform "Peoplenet" instead of SAP VM). The environmental data were surveyed annually for the first time. This resulted in better data quality and improved comparability. Data for 2014 were adjusted on the basis of new findings from the latest data survey.	
G4-23	Significant changes from previous reporting periods in the scope and aspect boundaries This GRI Content Index has been published for the first time in accordance with G4. Up to now, Bertelsmann GRI reporting has been based on the G3 guidelines.	

4. Stakeholder Engagement

G4-24	Stakeholder groups engaged by the company Alongside employees as "internal stakeholders," Bertelsmann's businesses and other activities mean that it is also in direct contact with a wide range of people outside the company, known as "external stakeholders": customers and suppliers, journalists, investors and representatives of government agencies, associations and non-government organizations. The company also reaches more than 600 million people every day through its media content and products. Public Dialog
G4-25	Basis for identification and selection of stakeholder groups The company identifies relevant stakeholder groups for purposes of the internal stakeholder dialog within the Group (e.g. in relation to participating in relevance analyses of Group-wide CR topics, see G4-18) in accordance with the criteria of balance and diversity: Representatives from executive management, the staff teams and operating business as well as shareholders and employee representatives are systematically integrated. This process of identification also considers diversity in terms of management level, international profile, age, and gender. The identified internal stakeholders are also in direct communication with the external stakeholder groups of their businesses. Bertelsmann gives priority to dialog with stakeholders who strongly influence the Group's economic, environmental and social performance, as well as those stakeholder groups which are significantly affected by Bertelsmann's economic, environmental or social performance.

GRI	Indicator	UNGC
	<p>In addition to this, a systematic external stakeholder dialog on selected Corporate Responsibility issues is in planning for the further strategic development of CR at Bertelsmann beyond the 2015 financial year.</p>	
G4-26	<p>Approaches to stakeholder engagement (type / frequency)</p> <p>The company maintains regular contact with journalists, investors and customers through its press offices, investor relations experts, and service centers. Apart from the routine daily press work, and the large number of events held by Bertelsmann, some of the formats used to maintain contact with the media and journalists include the Bertelsmann Annual Press Conference presenting the annual financial statements, and communication relating to publication of the half-year figures (conference call) and quarterly figures (press releases on Q1 and Q3).</p> <p>News & Media (Contacts)</p> <p>Bertelsmann uses various instruments to diversify its financing activities. Capital market financing plays an important role in the Group's finance strategy. Ratings and transparency with respect to the capital market make an important contribution to financial security and independence. Bertelsmann is in regular communication with investors and analysts to maintain favorable ratings transparency.</p> <p>Investor Relations (Contacts)</p> <p>The creative industry is an engine for business growth and jobs. Companies like Bertelsmann need a robust copyright framework and a convergent media landscape that is fit for the digital age if they are to be able to fulfill this role in the future and continue investing in high-quality creative and professional content.</p> <p>Bertelsmann's corporate liaison offices in Berlin and Brussels serve as the Group's centers of political expertise and as points of contact. The company also fosters engagement and communication with the general public and various stakeholders on cultural and community issues through Bertelsmann's comprehensive program Unter den Linden 1.</p> <p>Public Affairs (incl. Contacts and Mission Statement)</p> <p>Bertelsmann in Berlin (Contacts)</p> <p>Public Dialog</p> <p>Bertelsmann has also carried out a regular employee survey since 1977. On 7 November 2016, the fifth international employee survey will be launched at Bertelsmann. "Take Part! Take Action!" is the motto of the survey. More than 105,000 employees from around 50 countries will be invited to take part. See also G4-LA11.</p> <p>Employee Survey</p> <p>CR Magazine, p. 42: Bertelsmann Employee Survey</p> <p>Since 2008, Bertelsmann has fostered relations with students throughout the world using a number of tools including the career event "Talent Meets Bertelsmann."</p> <p>Talent Meets Bertelsmann (Contact, "Any questions")</p> <p>Bertelsmann is also in regular dialog with corporate responsibility and sustainability experts: with CR rating and ranking agencies (e.g. oekom Research, Sustainalytics, IöW), non-profit organizations (e.g. CDP), customers and business partners, auditors and certification bodies, research institutes (e.g. IFEU), and business partners – and as a member of bodies like Econsense, the forum for sustainable development of the German economy, and the Media CSR Forum (see G4-16).</p>	

GRI	Indicator	UNGC
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[CR Magazine p. 16: Guidelines and Partnerships](#)

Internal stakeholder surveys were carried out in the financial years 2013 and 2014 with the objective of determining relevant CR topics and shaping CR reporting on the basis of the findings. The relevance of specific non-financial topics for internal and external stakeholders was assessed in the surveys – with respect to employees, B2B and B2C customers, and a range of other relevant stakeholder groups (see G4-18). The implementation of an external stakeholder dialog on relevant Bertelsmann Corporate Responsibility topics is at the planning stage.

[Topics](#)

[CR Magazine, p. 14f.: Corporate Responsibility Topics](#)

G4-27 Key topics and concerns of stakeholders and response of the company

Bertelsmann and its divisions engage in multifaceted communication with various stakeholder groups (see G4-26). This dialog complements a comprehensive Issues and Risk Management System, as well as external ratings and rankings that evaluate the Group in comparison to its peers. Together they help Bertelsmann assess and review the trajectory of its engagement activities and report on them in a continuous process.

[Topics](#)

[CR Magazine, p. 14f.: Corporate Responsibility Topics](#)

See also DMA “Politics” for information on topics related to the political stakeholder dialog.

5. Report Profile

G4-28 Reporting period

The reporting period covers the 2015 financial year.

G4-29 Date of the most recent previous report

The last Bertelsmann GRI Content Index was published in December 2015. In addition, CR information is continuously updated on the Bertelsmann Corporate Website.

<http://www.bertelsmann.com/responsibility>

G4-30 Reporting cycle

Since 2013 Bertelsmann has produced an annual update of its GRI reporting in the form of an online GRI Content Index.

Financial figures have been reported annually since 1971 and employee figures have been reported annually since 1974. Since 2008, Bertelsmann has published a carbon footprint and other environmental indicators in a two-year reporting cycle. Since 2015, environmental reports have been produced annually.

In 2016, Bertelsmann supplemented CR Reporting with the CR magazine “24/7 Responsibility” (available as a pdf and print publication). This news magazine provides information about fundamentals, strategic developments and focus issues in sustainability management at Bertelsmann, its divisions, and its companies in the 2015 financial year.

[CR Magazine: “24/7 Responsibility. Corporate Responsibility 2015](#)

GRI	Indicator	UNGC
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G4-31 Contact for questions on the report

Katharina Kerl

Director

Corporate Responsibility

responsibility@bertelsmann.com**G4-32 The “in accordance” option for compliance with GRI and the index for the chosen option**

This GRI Content Index in the form of a table presents the index in accordance with GRI G4. It was drawn up in line with the “in accordance” option *core*.

G4-33 External assurance of the report

The economic indicators in this GRI Content Index were taken from the Bertelsmann Annual Report 2015, which was audited by the Pricewaterhouse Coopers AG audit firm.

[Annual Report 2015 \(Financial Information\), p. 136: Auditor's Report](#)

The selection and correct application of data sources and emission factors, the calculation methods and the review of the environmental indicators, and the calculation of climate emissions were supported by researchers at the IFEU Institute for energy and environmental research.

[Carbon Footprint 2015, p. 9](#)

6. Governance

G4-34 Governance structure of the company, including committees of the highest governance body

Bertelsmann SE & Co. KGaA and Bertelsmann Management SE each have their own individual Supervisory Boards. The members of the Executive Board of Bertelsmann Management SE are appointed and monitored by the Supervisory Board of Bertelsmann Management SE (dual governance structure of the SE). The Supervisory Board of Bertelsmann SE & Co. KGaA supervises the management of the business by Bertelsmann Management SE. The duties and responsibilities of the individual governance bodies are clearly defined in each case and are strictly separated from each other.

The Supervisory Board of Bertelsmann Management SE has formed a Personnel Committee and a Program Committee, and the Supervisory Board of Bertelsmann SE & Co. KGaA has formed an Audit and Finance Committee, and a Working Group of Employee and Management Representatives. The tasks of a Nomination Committee were also assigned to the Personnel Committee.

Additional disclosures:

[Corporate Governance](#)

[Members of the Supervisory Board](#)

[Members of the Executive Board and Group Management Committee](#)

[Annual Report 2015 \(Financial Information\), p. 127-130: Report of the Supervisory Board](#)

GRI	Indicator	UNGC
	<p>Since March 2015, senior representatives from the divisions have met on a regular basis in the Bertelsmann Corporate Responsibility Council under the leadership of the Chief Human Resources Officer. They work together to drive forward the strategic development of CR at Bertelsmann and contribute the operational perspective of the different businesses. In 2015, the CR council members also chaired cross-divisional, international CR Working Groups on the corporate responsibility topics that were most relevant for Bertelsmann.</p> <p>CR Organization</p> <p>CR Magazine, p. 14f.: Corporate Responsibility Organization</p> <p>MSD See also below: M3.</p>	

7. Ethics and Integrity

G4-56	<p>The company's values, principles and norms of behavior such as codes of conduct</p> <p>The business activities of Bertelsmann, all its divisions and companies are based on common values and guidelines.</p> <p>Bertelsmann Essentials</p> <p>Bertelsmann Code of Conduct</p> <p>Bertelsmann Supplier Code of Conduct</p> <p>Corporate Governance</p> <p>UN Global Compact</p> <p>The company is also currently addressing issues related to its own "Sense of Purpose," the mission that unites all Bertelsmann employees.</p> <p>CR Magazine, p. 38ff.: Interview with the Chief Human Resources Officer</p> <p>MSD Media are simultaneously business and cultural assets, and they also play a role in shaping public opinion. Bertelsmann shoulders the special responsibility that this entails for its own publishing businesses which results from the global production and dissemination of content and formats. The company follows clear principles in its operations for the areas of "Internal and External Press Freedom," "Quality," "Protection of Media Users and Customers," and "Protection of Intellectual Property."</p> <p>Media & Services</p> <p>CR Magazine, p. 28ff.: Press Freedom</p> <p>CR Magazine, p. 46ff.: Protection of Media Users and Customers</p>	I-X
G4-57-58	<p>Internal mechanisms for seeking advice on the ethical and lawful and internal and external mechanisms for reporting concerns about unethical or unlawful behavior</p> <p>The Executive Board created a Compliance Organization and established the Ethics & Compliance (E&C) Program in order to guarantee compliance. The Bertelsmann Ethics & Compliance Program is based on the relevant standards for compliance management systems and contributes as a feedback loop toward mitigating risks in various ways. Its basic elements include, in particular, the Bertelsmann Code of Conduct, compliance guidelines, risk analysis, advice, communication and training measures, whistleblower systems and case management.</p> <p>At Bertelsmann, employees, business partners and third parties will always be given a hearing when they ask questions, want to discuss any concerns about potential misconduct</p>	I-X

GRI	Indicator	UNGC
	in a confidential and safe setting, or want to make proposals for improving compliance procedures. Speak-Up CR Magazine, p. 17: Ethics & Compliance	

Performance Indicators

GRI	Indicator	UNGC
Category: Economic		
Aspect: Economic Performance		
G4-DMA	Management approach Bertelsmann aims to achieve a faster-growing, more digital and more international Group portfolio. As well as investments in existing activities, new business segments that provide a broader overall revenue structure are being increasingly explored. The education business is being gradually developed into the third earnings pillar alongside the media and service businesses. Group strategy comprises four strategic priorities, which again constituted the key work aspects for the Executive Board in 2015: strengthening the core businesses, digital transformation, developing growth platforms, and expanding into growth regions. In the financial year 2015, Bertelsmann made further significant progress in implementing its strategy. Annual Report 2015 (Financial Information), p. 6f.: Strategy Annual Report 2015 (Image Section): The new Bertelsmann 2016 Corporate Strategy Bertelsmann seeks to act as a responsible entrepreneur – in its business environment, toward the company's employees, and in its treatment of the environment. This is an integral part of Bertelsmann's corporate culture. This is why the Bertelsmann Essentials codify social responsibility as a core value for all the company's employees, executives, and shareholders. Bertelsmann's aim is to reconcile the Group's economic interests with social and environmental concerns, in dialog with all relevant stakeholders. CR Strategy & Management CR Magazine, p. 14f.: Corporate Responsibility	I-X

G4-EC1	Direct economic value generated and distributed Group revenues increased 2.8 percent to € 17.1 billion (previous year: € 16.7 billion) in the financial year 2015. This resulted in a Group profit of € 1,108 million (previous year: € 572 million; adjusted). The dividend paid out by Bertelsmann SE & Co. KGaA in the reporting period was unchanged year-on-year at € 180 million. Annual Report 2015 (Financial Information), p. 39, 64-68: Consolidated Income Statement Foundations are shareholders at Bertelsmann and they hold 80.9% of the shares: Bertelsmann SE & Co. KGaA is an unlisted partnership limited by shares. Three foundations (Bertelsmann Stiftung, Reinhard Mohn Stiftung, and BVG-Stiftung) hold 80.9%
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GRI	Indicator	UNGC
	<p>of the shares in Bertelsmann SE & Co. KGaA, with the remaining 19.1% held indirectly by the Mohn family.</p> <p>Annual Report 2015 (Financial Information), p. 6: Shareholder Structure</p> <p>In the financial year 2015, Bertelsmann SE & Co. KGaA invested € 1.016 million at the level of the Corporate Center for charitable purposes in the areas of education, culture, research and creativity. Furthermore, our divisions and companies made contributions to a large number of donation and sponsorship projects for local issues. See DMA Local Communities.</p>	
G4-EC3	<p>Coverage of the company's defined benefit plan obligations</p> <p>The Bertelsmann Group operates various pension plans for current and former employees and their surviving dependents. The model of such plans varies according to the legal, fiscal and economic environment of the country concerned.</p> <p>These company pension plans include both defined contribution and defined benefit plans. Expenses for defined contribution plans in the amount of € 50 million were recognized in the financial year 2015 (previous year: € 40 million). Expenses for defined benefit plans in the financial year 2015 were recognized in the amount of € 132 million in the financial year 2015 (previous year: € 119 million).</p> <p>The total for defined benefit obligations on December 31, 2015, amounted to € 3,960 million (previous year: € 4,219 million). After deduction of the fair value of net assets amounting to € 2,365 million (previous year: € 1,624 million), the net defined benefit liability recognized in the balance sheet amounted to € 1,595 million (previous year: € 2,595 million).</p> <p>A voluntary contribution in the amount of € 650 million was made to plan assets in the financial year 2015. The majority of the plan assets are managed by Bertelsmann Pension Trust e. V. under a contractual trust arrangement (CTA).</p> <p>Annual Report 2015 (Financial Information), p. 86-92: Provisions for Pensions and Similar Obligations</p>	
MSD M1	<p>Significant funding and other support received from non-governmental sources (advertisements, etc.)</p> <p>The category "Advertising" makes up 24.7% (previous year: 24.8%) of Group revenues.</p> <p>Annual Report 2015 (Financial Information): Revenues by Category, p. 13</p>	
<div data-bbox="113 1630 1498 1771"> <div>Category: Environmental</div> <div>Aspect: Materials</div> </div>		
G4-DMA	<p>Management approach</p> <p>Bertelsmann's business activities involve the company in a complex interrelationship with the environment. This gives rise to a special ecological responsibility. Together with its employees, and in dialog with its stakeholders, Bertelsmann promotes the responsible and efficient use and sustainable sourcing of energy and natural resources.</p>	VII-VIII

GRI	Indicator	UNGC
	<p>Digitalization promotes the dematerialization of consumption and makes our businesses less dependent on limited natural resources. Bertelsmann meets increasing regulatory requirements by enhancing transparency about the environmental impact across our value chain. In combination with effective energy management, the company sees this as an opportunity to save on operating costs and reduce its environmental footprint. Energy and environmental management are handled locally by Bertelsmann's management teams. They receive support from a cross-divisional working group that develops Group-wide tools and coordinates projects like the compilation of Bertelsmann's carbon footprint, or Bertelsmann's "be green Day".</p> <p>Environment</p> <p>Bertelsmann Environmental Policy</p> <p>be green Mission Statement</p> <p>CR Magazine, p. 75: Environmental Management and Climate Protection</p> <p>CR-Magazine p. 83: Fast Read – Eco-Efficiency</p> <p>Since 2008, Bertelsmann has regularly recorded its Group-wide carbon footprint and other relevant environmental data. The carbon footprint highlights the impacts of our business activities on the climate and environment. Every year, the Corporate Center collects environmental data for the carbon footprint from all the divisions worldwide, which is then aggregated. Based on the data collected by the companies and sites, the greenhouse gas emissions are calculated and used to draw up Bertelsmann's carbon footprint. This includes information on energy, paper, water, wastewater and waste, in addition to information on emissions. The results provide transparency about Bertelsmann's environmental performance, facilitate performance management, and allow measures and actions to be derived.</p> <p>The independent IFEU Institute for Energy and Environmental Research in Heidelberg provides support for Bertelsmann's environmental reporting. The researchers carry out plausibility checks, assist in the calculation of greenhouse gas emissions, and make suggestions for further developing the Group-wide survey.</p> <p>Carbon Footprint 2015</p> <p>CR Magazine, p. 76ff.: How is the Carbon Footprint Calculated?; Statements on the Carbon Footprint</p> <p>Paper is and remains the most important resource for Bertelsmann. A wide range of papers is used in the production of books, magazines, catalogs, and other printed materials, in providing print services, and in office communications. Bertelsmann therefore promotes the responsible, efficient and considerate use of this resource and the reduction of paper waste.</p> <p>Bertelsmann and its divisions are actively embracing a responsible considerate use of paper throughout the entire value chain. Our aim is to strike a sustainable balance between economic necessities and ecological requirements in paper-related decision-making processes. Bertelsmann and its divisions make every effort to ensure that the papers used are legally sourced from well-managed and credibly certified forests. Logging and paper production processes must also take into account sustainability, social and environmental aspects. Bertelsmann therefore gives preference to certified wood fiber and paper with maximized post-consumer recycled content. Trees from ancient and endangered forests and forests with a high conservation value must not be exploited for the production of papers used at Bertelsmann.</p>	

GRI	Indicator	UNGC
	<p>Bertelsmann also supports environmentally friendly pulp and paper production that meets high ecological standards. All of Bertelsmann's print products are printed exclusively on paper, whose pulp content is bleached either entirely without chlorine (TCF – totally chlorine free) or elementally without chlorine (ECF – elementally chlorine free). The Group and its companies prefer to work with suppliers that have EMAS/ISO 14001 accreditation. Bertelsmann supports and encourages the implementation of chain-of-custody systems to show that wood comes from certified forests.</p> <p>Bertelsmann Paper Policy</p>	
G4-EN1	<p>Materials used by weight or volume</p> <p>Paper consumption constitutes the biggest percentage of raw materials consumed at Bertelsmann. Compared with 2014, paper consumption has declined by 72,000 tons (down 4%) to 1,874,000 tons. Bertelsmann itself ordered 1.2 million tons of paper out of the total volume of paper used by the Group. The additional paper volumes were supplied by customers to the printing firms. A detailed overview for the individual corporate divisions is provided in the Carbon Footprint 2015, p. 11.</p>	VII-VIII
G4-EN2	<p>Percentage of materials used that are recycled input materials</p> <p>Paper with the maximum percentage of recycled content is preferred in accordance with the Bertelsmann Paper Policy. The percentage of recycled paper purchased by Bertelsmann companies rose slightly from 19% to 20% compared with 2014. By contrast, the proportion of paper from sustainably-certified sources increased significantly to 52% (up from 41% in 2014:). This means that the proportion of recycled or sustainably-certified paper corresponds to 72% overall of the paper purchased by Bertelsmann companies. This is equivalent to an increase by 12 percentage points.</p> <p>See also Carbon Footprint 2015, p. 11</p>	VIII
Aspect: Energy		
G4-DMA	<p>Management approach</p> <p>For information on environmental management and climate protection at Bertelsmann, including relevant links: see above G4-DMA Materials.</p> <p>The topic of energy is a focus issue in cross-divisional cooperation on environmental protection and climate management. Communication of ideas and experience in the Bertelsmann “be green” working group and concrete cooperation on Group-wide energy efficiency projects also facilitate savings in energy consumption and costs, reduction of expenses, and cuts in greenhouse gas emissions.</p> <p>Carbon Footprint 2015, p. 10</p>	VII - IX
G4-EN3	<p>Energy consumption within the organization</p> <p>In 2015, the use of heating and cooling energy amounted to 692,000 megawatt hours (MWh) and usage came down by 4% compared to 2014 (722,000 MWh). Electricity consumption at 835,000 MWh also came down slightly by 1% in 2015 compared with the previous year (2014: 847,000 MWh). By contrast, the use of fuel for vehicles increased by</p>	VII, VIII

GRI	Indicator	UNGC
	4% in 2015 from 65,000 MWh in 2014 to 67,000 MWh. See also Carbon Footprint 2015, p. 10	
G4-EN5	Energy intensity The energy intensity was recorded on the basis of the revenues of the Group units shown in the environmental data due to the very different types of business activity carried out in the individual divisions. During the current reporting year, the specific energy use was reduced. This means that the proportion of energy used (electricity, heat, transport) in megawatt hours per 1 million euros of revenues across the Bertelsmann Group of companies came down from 134 MWh/€ million in 2014 to 108 MWh/€ million. Carbon Footprint 2015, p. 10	VIII
G4-EN6	Reduction of energy consumption Total energy consumption in the year 2015 fell by 2% in 2015 compared with the previous year. Carbon Footprint 2015, p. 10	VIII, IX

Aspect: Water

G4-DMA	Management approach For information on environmental management and climate protection at Bertelsmann, including relevant links: see G4-DMA Materials above. Similarly to other environmental issues, data on water consumption is also collected in Bertelsmann's annual Group-wide environmental data survey. This data allows for determining trends and identifying potential improvements to be identified. The data is processed locally in the businesses due to the local importance of this topic. Carbon Footprint 2015, p. 12	VII, VIII
EN8	Total water withdrawal by source In the 2015 financial year, water consumption increased to 4.6 million cubic meters, up 17%, from the 4.0 million cubic meters used in 2014. In 2015, 2.8 million cubic meters of water came from our own wells – mostly for cooling purposes – and 1.8 million cubic meters from the public water supply. Carbon Footprint 2015, p. 12	VII, VIII

Aspect: Emissions

G4-DMA	Management approach For information on environmental management and climate protection at Bertelsmann, including relevant links: see G4-DMA Materials above. Environmental responsibility at Bertelsmann and its businesses also includes the avoidance and reduction of greenhouse gas emissions that are causing climate change.	VII-IX
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GRI	Indicator	UNGC
	<p>Since 2014, data on the emissions has been collected in the annual Group-wide data survey at Bertelsmann. This emission data provides the local units with a basis for additional measures tailored to local markets for effective energy management and climate protection, such as the acquisition of energy-saving technology or procurement of renewable energies. The development of the climate data will be analyzed by the “be green” working group in the course of Group-wide cooperation, and measures will be discussed and initiated across the Group as necessary.</p> <p>Greenhouse gas emissions are accounted for in close adherence to the “Corporate Accounting and Reporting Standard”, the “GHG Protocol Scope 2 Guidance” and the “Corporate Value Chain (Scope 3) Standard” of the Greenhouse Gas Protocol. The carbon footprint is reported in CO₂ equivalents (CO₂ eq). Apart from carbon dioxide, calculation of CO₂ equivalents also includes methane and nitrous oxide in conformity with their global warming potential.</p> <p>Carbon Footprint 2015, p. 5ff.</p>	
G4-EN15	<p>Direct greenhouse gas (GHG) emissions (Scope 1)</p> <p>In 2015, the company’s total direct CO₂ emissions amounted to 283,000 tons of CO₂eq. Of this, 39% was attributable to electricity consumption, 54% to heating and only 7% was caused by the burning of fuels during transport in company-owned cars.</p> <p>Carbon Footprint 2015, p. 7, 13</p>	VII, VIII
G4-EN16	<p>Energy indirect greenhouse gas (GHG) emissions (Scope 2)</p> <p>Site-based: In 2015, the company’s total indirect energy-related CO₂eq emissions amounted to 414,900 tons of CO₂eq. Of this, 87% was attributable to electricity consumption, and 13% to the production of heating and cooling.</p> <p>Market-based: In 2015, the company’s total indirect energy-related emissions taking market-based factors into account amounted to 349,000 tons of CO₂eq.</p> <p>Carbon Footprint 2015, p. 7, 13</p>	VII, VIII
G4-EN17	<p>Other indirect greenhouse gas (GHG) emissions (Scope 3)</p> <p>The indirect greenhouse gas emissions derived from the manufacture of insourced paper, from business travel and from employees commuting to work are reported in the Bertelsmann Carbon Footprint in the Scope 3 category.</p> <p>Paper is the most important raw material for the Bertelsmann Group and a large amount of CO₂ is generated in the manufacture of this resource. The total volume of paper purchased by Bertelsmann companies in financial year 2015 accounted for 1.47 million tons of CO₂eq.</p> <p>The emissions from business trips amounted to 53,100 tons CO₂eq (plus 5% compared with the previous year). The emissions from daily commutes by employees amounted to 71,700 tons CO₂eq (plus 10% by comparison with the previous year). For further details see Carbon Footprint 2015, p. 7, 13</p>	VII, VIII
G4-EN18	<p>Greenhouse gas (GHG) emissions intensity</p> <p>The specific greenhouse gas emissions are recorded based on the revenues of the Group units shown in the environmental data because of the widely varying business activities</p>	VIII

GRI	Indicator	UNGC
	<p>carried out in the individual divisions.</p> <p>In the financial year 2015, the energy intensity for energy-based emissions (electricity, heat, transport) was 55 tons of CO₂eq/€ million, as compared to 47 tons of CO₂eq/€ million in 2014.</p> <p>Carbon Footprint 2015, p. 7</p>	
G4-EN19	<p>Reduction of greenhouse gas (GHG) emissions</p> <p>Scope 1 and 2 greenhouse gas emissions increased slightly in 2015 by comparison with the previous year, resulting in a 5% increase when calculated in accordance with the site-based method, and 1% in accordance with the market-based method.</p> <p>For further details see Carbon Footprint 2015, p. 7</p>	VIII, IX
Aspect: Waste		
G4-DMA	<p>Management approach</p> <p>For information on environmental management and climate protection at Bertelsmann, including relevant links: see G4-DMA Materials above.</p> <p>Similarly to other environmental issues, data on wastewater and waste is also collected in Bertelsmann's annual Group-wide environmental data survey. This data allows for identifying trends and determining potential improvements. Due to the local importance of water management and waste management, these topics are dealt with locally in the businesses.</p> <p>Carbon Footprint 2015, p. 12, 14</p>	VIII
G4-EN22	<p>Total water discharge by quality and destination</p> <p>In 2015, wastewater discharge rose to 3.5 million m³, up 11% from 2014 (3.1 million m³) on account of the higher consumption of fresh water.</p> <p>Wastewater data is not broken down by type in the Group-wide environmental data survey because the importance of the topic is primarily local. Expansion of reporting for this topic is not planned at present.</p> <p>Carbon Footprint 2015, p. 12</p>	VIII
G4-EN23	<p>Total weight of waste by type and disposal method</p> <p>In 2015, the volume of waste decreased by 2% to 307,900 tons. Of this, 94% was attributable to recyclable waste, which was mainly generated by paper waste in the printing facilities. Residual waste consisted of 1% hazardous waste and 5% waste for disposal.</p> <p>For further details see Carbon Footprint 2015, p. 14</p>	VIII

GRI	Indicator	UNGC
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Category: Social		
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Sub-category: Labor Practices and Decent Work		
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Aspect: Employment		
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G4-DMA	Management approach	I, III, VI
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Bertelsmann is a media, services and education company and employees are the key factor for its success. The company had 117,000 employees worldwide in 2015 and develops new ideas and products every day. Guaranteeing fair working conditions is a fixed element of Bertelsmann corporate culture. The Bertelsmann corporate constitution and the “Bertelsmann Essentials”, which enshrine the targets and fundamental values for all employees, managers and shareholders, form the platform for this culture.

Partnership and trustful cooperation with our employees and their representatives, a fair share of benefits, a high level of job security and the protection of our employees’ privacy are the key topics in ensuring fair working conditions at Bertelsmann.

The responsibility for ensuring fair working conditions lies with the local businesses. At Group level, we create the framework conditions necessary for fulfilling this responsibility.

[Employees](#)

[Bertelsmann Essentials](#)

[CR Magazine, p. 36ff.: Fair Working Conditions](#)

G4-LA1	Total number and rates of new employee hires and employee turnover	VI
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Bertelsmann not only seeks to acquire customers in its markets – the Group also aims to recruit the best employees in order to secure the company’s success over the long term. Bertelsmann is in a process of transformation. This includes the restructuring of a number of traditional businesses. As part of the process, jobs will be cut in some parts of the company and redistributed in other parts, while new jobs will be created in many other areas of the Group.

The company did not publish any detailed turnover statistics and disclosures on new jobs for the financial year 2015. Since the method for counting employees was adjusted at the end of the year, the turnover statistics for the year 2015 are no longer informative. Many aberrations are based on the differing definitions of values at the beginning and end of the year.

[Indicators \(Tab “Employees”\): Turnover 2011-2014](#)

[CR Magazine, p. 36ff.: Fair Working Conditions](#)

Aspect: Labor/Management Relations		
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G4-DMA	Management approach	III
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Dialog between employees and management is essential for effective partnership and a successful business. Employee participation is alive and well at Bertelsmann – well beyond the extent mandated by law. It requires strong representatives, clear rules, and mutual trust. That is why employees, executives, people with disabilities, and trainees have

GRI	Indicator	UNGC
	<p>various platforms for exchanging ideas, advancing shared topics, and constructively contributing their concerns to the dialog with the company's management.</p> <p>The employees have five representatives on the 16-strong Supervisory Board of Bertelsmann SE & Co. KGaA: four of them from the works councils and one representative from the Bertelsmann Management Representative Committee (BMRC).</p> <p>Employee Representation</p> <p>Three Bertelsmann interest groups – the Bertelsmann works councils, the Group-wide Bertelsmann Group Dialog Conference and the international Bertelsmann Management Representatives Committee – are presented in the latest CR Magazine. Please see the following link.</p> <p>CR Magazine, p. 6f.: Partnership Needs Strong Representation</p> <p>The transformation of Bertelsmann is also leading to major changes in functions, and in some cases also in working conditions. Bertelsmann sees this as an opportunity for the company and the employees but also recognizes it as a challenge. The Group is committed to keeping the transition process as smooth as possible, and structuring the change to the benefit of employees. The provision of information at an early stage, and of assistance and support throughout, is very important for the members of staff affected by the restructuring.</p> <p>CR Magazine, p. 36ff.: Fair Working Conditions</p>	
G4-LA4	<p>Minimum notice periods regarding significant operational changes</p> <p>Bertelsmann ensures that employees are informed as early as possible about strategic developments and the management's plans. The company also integrates employees in change processes at an early stage so that they can play a role in finding the best possible solutions. In many areas, the company goes beyond the statutory regulations, for example the Works Constitution Law in Germany.</p> <p>At the end of 2015, personnel managers and members of works councils adopted the "BeWege" project, involving local managers. The aim of the project is to ensure the structural change is at Bertelsmann proactively shaped and that there is complete transparency in the internal job market within the Group. When businesses are in structural decline and this puts jobs at risk, the affected employees are provided with early-stage help and advice at a "Development and Transfer Center" – focused in Gütersloh (a location with around 11,000 employees). They are then upskilled with new qualifications to enable them to take on new functions within the Group. See also G4-LA10.</p>	III

Aspect: Occupational Health and Safety

G4-DMA	<p>Management approach</p> <p>New ways of organizing work, new digital technologies, accelerated work processes, increasing complexity, intensified work loads, and constantly increasing international competitive pressure ultimately impact on the well-being of employees. With a view to responding actively to these challenges at an early stage, the Bertelsmann Group has consequently been investing in the health of its employees for many years.</p> <p>Bertelsmann's Health Management unit is responsible for the Germany-wide health</p>	I, VI
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GRI	Indicator	UNGC
	<p>strategy and coordinates health-related activities in Germany. The Bertelsmann “Health Community,” composed of health experts from all the divisions, Group works council chairs, supervisory board members, HR officers, and the representative body for employees with disabilities, is meant to serve as a network to facilitate the implementation of uniform standards across all sites. The medium-term goal is to internationalize Bertelsmann’s health management.</p> <p>Bertelsmann Health Management CR Magazine, p. 62ff.: Health</p>	
G4-LA6	<p>Accidents, occupational diseases, lost days, absenteeism, and work-related fatalities</p> <p>The Bertelsmann companies in Germany record data on accident statistics and this data takes account of notifiable occupational and commuting accidents. The accident rate in the financial year 2015 amounted to 17.8 (per 1,000 employees; 2014: 18.3). A breakdown of the data by gender and disclosures on fatalities is not available.</p> <p>Indicators (Tab “Employees”): Accident statistics</p>	
Aspect: Training and Education		
G4-DMA	<p>Management approach</p> <p>A highly trained workforce is needed to tackle major societal challenges such as demographic change, the Group’s increasing internationalization, and a changing media landscape. Basic and career training combined with lifelong learning are therefore an effective and smart investment in the future for the company and its employees. Corporate education promotes creativity and innovation and empowers the company and its employees to handle market changes and organizational transformations.</p> <p>The Bertelsmann University is comprised of four different campuses – Strategy, Function, Leadership, Individual. It is the central learning institution for employees and managers in the Group. Bertelsmann University is headed by the Chief Learning Officer, who reports to the Chief Human Resources Officer.</p> <p>Learning Continuing Education CR Magazine, p. 18ff.: Education</p>	I, VI
G4-LA9	<p>Average hours of training per year</p> <p>In 2015, the average number of career training hours was 4.7 per employee.</p> <p>Indicators (Tab “Employees”): Staff training and development</p> <p>In 2015, 86,609 training courses were completed by Bertelsmann employees on the Group’s dedicated HR IT platform “Peoplenet”.</p>	VI
G4-LA10	<p>Programs for skills management and lifelong learning that support the continued employability of employees</p> <p>Bertelsmann University: Information on the structure and courses offered by Bertelsmann University (see DMA Training and Education) is available from the following sites.</p>	

GRI	Indicator	UNGC
	<p>Continuing Education</p> <p>Bertelsmann University Website</p> <p>Bertelsmann Peoplenet: Bertelsmann provides its employees with the global HR IT platform "Peoplenet." This learning tool gives access to all central, divisional and company-specific training packages and career-training programs. At the end of 2015, Peoplenet was already available to more than 60,000 employees in 13 countries. The object is to eventually roll out the platform to all Group companies across the world.</p> <p>Demographic change: Demographic change creates major challenges for Bertelsmann, especially in Germany. With this in mind, pilot projects to analyze age structures have been carried out at the company sites in Gütersloh since 2014. These analyses determine the current age structure, forecast jobs and employee skills, and project future changes in the age structure. Measures for dealing with demographic change are then derived on this basis. This idea is to enable personnel planning and personnel development, and to avoid losing key qualifications (for example when people retire).</p> <p>Generations</p> <p>CR Magazine, p. 59: Strategies Related to Demographic Change</p> <p>Project "BeWege": Bertelsmann joined forces with the Group Works Council to launch the "BeWege" project in Gütersloh with the aim of potentially finding a new job within the Group for employees who are affected by restructuring. The project is intended to give support to employees whose job is at risk, help them in the process of reskilling, and play a mediating role by actively helping them to find a new job.</p> <p>CR Magazine, p. 41: Fair Working Conditions. Interview with Chief Human Resources Officer</p>	
G4-LA11	<p>Percentage of employees receiving regular performance and career development reviews</p> <p>Bertelsmann Performance and Development Dialog: The annual Performance and Development Dialog is a confidential annual meeting to provide Bertelsmann employees with detailed feedback from their immediate supervisor based on clear assessment criteria. Performance is evaluated on the basis of results and on the conduct employed in achieving the performance. Opportunities for personal and professional development are discussed and an individual development plan is generated. In 2015, the employees' Performance and Development Dialog was revised for 'promotion of individual career development' and it was complemented with a new potential assessment tool.</p> <p>The majority of managers and employees without management responsibility engage in this dialog. The new Bertelsmann HR IT Platform "Peoplenet" will provide statistical data in future.</p> <p>Bertelsmann Team Meeting/ "January Meeting": The January Meeting/Team Meeting is the annual group meeting between employees and their direct supervisors – a "bottom-up" feedback process that is carried out in many Bertelsmann companies across the world. The meeting is intended to reinforce cooperation and help supervisors to improve their work as managers.</p> <p>Performance Reviews</p> <p>Bertelsmann Employee Survey: Since 1977, the Bertelsmann Employee Survey has served as a key element of our corporate culture of partnership within the Group.</p>	VI

GRI	Indicator	UNGC
	<p>Approximately 70,000 employees in 50 countries participated in the last survey in 2013. The Employee Survey serves to gauge the staff's satisfaction with important aspects of working life, such as the leadership conduct of their supervisors, opportunities for career training and development, cohesion and collaboration in teams, and the business strategy. The aim of the survey is to enter into a dialog with the employees and jointly derive measures for improvement based on the results. Implementation of the action plans can then be tracked in the Team/January Meetings.</p> <p>Employee Survey</p> <p>CR Magazine, p. 42f.: The Bertelsmann Employee Survey</p>	

Aspect: Diversity and Equal Opportunity

G4-DMA	<p>Management approach</p> <p>Employees are the driving force behind Bertelsmann's creativity and innovation. Diversity management means managing their diversity for the benefit of the company and its workforce, with a focus on appreciation and the promotion of individual potential.</p> <p>Bertelsmann seeds a clear business case for Diversity Management. To ensure the sustainable success of its transformation, Bertelsmann needs all kinds of talent – regardless of their age, gender or background. In many lines of business, heterogeneous teams are often more creative and innovative than homogeneous teams. They can respond more flexibly to changes in the market, and open up new markets.</p> <p>The diversity strategy at Bertelsmann is based on three pillars: the business case of the issue, an evolutionary approach (no one size fits all), and clearly defined focuses. A key challenge lies in making the business case for diversity visible and tangible. Bertelsmann's decentralized organizational structure requires highly differentiated solutions for international legitimation and implementation of diversity. The current strategic diversity action areas are gender, generations, and internationality.</p> <p>The Diversity Management department at the Group headquarters serves as an impulse generator, in-house consultancy and change agent, with the support of a Group-wide Diversity Working Group. The department reports to the Chief Human Resources Officer. The divisions and companies are responsible for actually taking measures in the areas of action.</p> <p>Diversity Strategy</p> <p>CR Magazine, p. 61: Fast Read – Diversity</p> <p>Diversity: Gender</p> <p>Diversity: Generations</p> <p>Diversity: Cultural Diversity</p>	I, VI
G4-LA12	<p>Composition of governance bodies and breakdown of employees according to gender, age group, minority group membership, and other indicators of diversity</p> <p>In the financial year 2015, Bertelsmann had business operations in about 50 countries around the world. In Germany alone, people of 92 different nationalities work for Bertelsmann.</p> <p>On December 31, 2015, 53% of the employees were female and 47% were male. One</p>	I, VI

GRI	Indicator	UNGC
	<p>woman is currently a member of the Executive Board and this is currently equivalent to 20%. The female quota in the Bertelsmann Group Management Committee was 38% on December 31. The proportion of women on the Supervisory Board was 20%.</p> <p>The biggest proportion of female and male workers is represented by the age group 25-30.</p> <p>Indicators (Tab "Employees")</p> <p>Members of the Supervisory Board</p> <p>Members of the Executive Board and the Group Management Committee</p>	

Aspect: Equal Remuneration for Women and Men

G4-DMA	Management approach	I, VI
	<p>In its Code of Conduct, Bertelsmann codifies the equal treatment of women and men as an important principle: "We treat each other in a mutually respectful and trusting manner and seek to create a workplace environment that does not allow for discrimination." (p.13) This also applies for remuneration.</p> <p>See DMA Non Discrimination.</p> <p>Bertelsmann's remuneration policy is to establish uniform, consistent remuneration structures within the Group. The remuneration system should ensure a remuneration that is based solely on market-related, functional, and performance criteria – taking into account any business-specific peculiarities – and that is therefore gender-neutral. Any explicit job or role descriptions are likewise completely gender-neutral. Given comparable markets, comparable positions and equal performance, men and women have the same earning potential.</p> <p>No statistics taking account of all the relevant factors are available on this aspect at the level of the Bertelsmann Group.</p>	
G4-LA13	Ratio of basic salary and remuneration of women to men	I, VI
	<p>No statistics taking account of all the relevant factors are available on this aspect at the level of the Bertelsmann Group.</p>	

Sub-category: Human Rights

Aspect: Non-discrimination

G4-DMA	Management approach	I, II, VI
	<p>The Bertelsmann Code of Conduct serves as a common guideline for lawful and ethical behavior within the company and toward business partners and the general public. The code applies to all employees throughout the world. Everyone in the company – employees, Executive Board, and Supervisory Board – are obligated to adhere to the principles established in this Code.</p> <p>The following is stated on page 13 of the Bertelsmann Code of Conduct: "We treat each other in a mutually respectful and trusting manner and seek to create a workplace environment that does not permit discrimination," and we provide a detailed explanation of this.</p>	

GRI	Indicator	UNGC
	<p>The Code of Conduct also provides a guideline on appropriate approaches to decision-making and gives information on the speak-up procedure provided by the company, in other words the opportunities available for obtaining advice, expressing concerns on potential misconduct in a confidential and safe setting, or making proposals for improving compliance processes.</p> <p>Bertelsmann Code of Conduct, p. 13</p> <p>Furthermore, contacts for equal opportunities in accordance with the German Anti-discrimination Law (AGG) have been appointed at all German sites and employees can consult them on any issues relating to discrimination. Brochures, posters and information posted on the company Intranet provide members of the workforce with information about their rights in accordance with the 'German Anti-discrimination Law' (AGG).</p>	
G4-HR3	<p>Total number of incidents of discrimination and corrective actions taken</p> <p>At Bertelsmann, employees, business partners and third parties will always be given a hearing when they ask questions, want to discuss any concerns about potential misconduct in a confidential and safe setting, or want to make proposals for improving compliance procedures. The main points of contact are the Bertelsmann "Ethics & Compliance" department, the Internet-based www.reportconcerns.com system and external ombudspersons appointed by Bertelsmann.</p> <p>Speak-Up</p> <p>All the reports of possible compliance violations we received were investigated and appropriate action was taken.</p>	I, II, VI
Aspect: Freedom of Association and Collective Bargaining		
G4-DMA	<p>Management approach</p> <p>Partnership and a trustful cooperation with our employees and their representatives, a fair share of benefits, a high level of job security, and the protection of our employees' privacy are key topics in ensuring fair working conditions. See DMA Labor/Management Relations and DMA Non-discrimination.</p> <p>CR Magazine, p. 36ff.: Fair Working Conditions</p> <p>The right to freedom of association is highlighted in the Bertelsmann Code of Conduct: "We uphold both the right to freedom of association and the right to engage in collective bargaining in accordance with applicable laws and regulations" (p. 33). Compliance with these requirements is continuously monitored by the feedback loop ("E&C Feedback Loop") established with the Ethics & Compliance Program.</p> <p>Bertelsmann Code of Conduct, p. 33</p> <p>Speak-Up</p> <p>The Bertelsmann Supplier Code of Conduct also commits all business partners of Bertelsmann who play a role for, together with, or on behalf of the company to comply with legal compliance and ethical minimum standards. These minimum standards have to be passed on along the value chain to third parties by the business partner if they are being involved in carrying out the activity of the business partner for Bertelsmann (e.g. subcontractor). The business partner should play an appropriate role in ensuring compliance at this stage of the value chain.</p>	I-III

GRI	Indicator	UNGC
	<p>The Bertelsmann Supplier Code of Conduct also defines the right to freedom of association: “Furthermore, our business partners observe the rights to freedom of association and collective bargaining in compliance with the applicable rights and regulations” (p. 16).</p> <p>Information for Business Partners</p> <p>Bertelsmann Supplier Code of Conduct, p. 16</p>	
G4-HR4	<p>Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk and measures taken to support these rights</p> <p>No cases occurred and no risks were identified in 2015.</p>	I-III

Aspect: Child Labor

G4-DMA	<p>Management approach</p> <p>The Bertelsmann Code of Conduct emphasizes the prohibition on child labor: “We condemn forced or child labor and any form of exploitation or discrimination and strictly comply with applicable laws.” (p. 33).</p> <p>The E&C Feedback Loop ensures continuous monitoring of compliance with these requirements (communication, training, whistleblower systems, investigation into reported violations, remediation).</p> <p>Bertelsmann Code of Conduct, p. 33</p> <p>See also DMA Non-discrimination.</p> <p>Speak-Up</p> <p>The Bertelsmann Supplier Code of Conduct also prohibits child labor: “Any form of forced and child labor is prohibited with our business partners.” (p. 15)</p> <p>Bertelsmann Supplier Code of Conduct, p. 15</p> <p>See also DMA Freedom of Association and Collective Bargaining.</p>	I, II, V
G4-HR5	<p>Operations and suppliers identified as having significant risk for incidents of child labor and measures taken</p> <p>Contracts must not be concluded with suppliers if they do not satisfy the requirements of the Bertelsmann Supplier Code of Conduct.</p> <p>Bertelsmann Supplier Code of Conduct</p>	I, II, V

Aspect: Forced or Compulsory Labor

G4-DMA	<p>Management approach</p> <p>See DMA Child Labor</p>	I, II, IV
G4-HR6	<p>Operations and suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures taken</p> <p>See G4-HR5.</p>	I, II, IV

GRI

Indicator

UNGC

Aspect: Intellectual Property

G4-DMA Management approach**I-II**

The protection and safeguarding of intellectual property is central to our business activities as a media and service company. Bertelsmann is home to performing artists and other creative people who trust the company to deal responsibly with their creative achievements.

Bertelsmann's businesses include the development, production, transfer, licensing, and sale of products and services protected as intellectual property. The Group's economic returns are dependent on the performance of the authors and performing artists associated with our company – and that creative talent depends on the returns they receive through marketing their works with the company. Against this background, Bertelsmann has a particular obligation to protect intellectual property, and makes a commitment to a high level of protection worldwide. Here, the question of how copyright protection can be transferred, comprehensively and fairly, from the analog to the digital world becomes central. Bertelsmann is therefore actively committed to providing information on the value of intellectual property and to strengthening its protection in the digital world. Bertelsmann also takes action against the illegal distribution of content. This is the only way that performing artists can benefit from their creativity and the Group can remain competitive. As a media company, this also empowers Bertelsmann to secure its long-term ability to invest in new content and to attract new creative talent as part of the contribution to cultural and creative diversity.

[Intellectual Property Protection](#)

Aspect: Freedom of Expression

G4-DMA Management approach**I-II**

The Bertelsmann Code of Conduct defines freedom of expression and opinion in terms of editorial and journalistic independence as a fundamental principle of business activities at Bertelsmann: "Editorial and journalistic independence is the foundation of our publishing, broadcasting and news reporting activities" (p. 23).

Bertelsmann believes that press freedom has two aspects: Internally, it means that our management does not interfere with editorial decision-making or the independence of our editorial personnel or program makers. Externally, the company does not permit any political or commercial influence to be exerted on its journalistic reporting. All rules on the separation of advertising and editorial content are complied with.

Bertelsmann guarantees in-house press freedom with its "editor-in-chief principle." This enables editorial decisions to be made solely by our program managers, free from influence by the Group's owners or management. Many companies and editors have also implemented further statutes for safeguarding journalistic independence in the day-to-day business. The focus here is primarily on journalistic duty of care, respect for individual rights, dealing with representations of violence, and the protection of minors. These topics are also part of the in-house editorial teams' education and training.

[Press Freedom](#)

[CR Magazine, p. 28ff.: Press Freedom](#)

GRI

Indicator

UNGC

Sub-category: Society

Aspect: Local Communities

G4-DMA Management approach**I**

Bertelsmann sees itself as part of the community and as a partner to society. Citizenship is firmly anchored in the corporate culture as one of the four Bertelsmann Essentials, which outline the fundamental attitudes and principles for all employees, managers and shareholders. This codifies the incorporation of responsibility in the daily operations of the company, its divisions and companies. In this spirit, Bertelsmann wants to fulfill its responsibility as a “good citizen” by working toward a livable environment and making a contribution to society. This also means that we put our media, our services, our expertise – and our funds – to work where help and support are needed outside the company.

In line with the local organizational structure of the Group, the responsibility for planning and implementation of concrete “corporate citizenship” projects is vested in the local businesses. Bertelsmann is also committed at Group level to a wide range of dialog formats and sponsorship projects in the areas of education, culture, research, and creativity to address societal issues.

[Society](#)

[CR Magazine, p. 84ff.: Corporate Citizenship](#)

G4-SO1 Percentage of operations with implemented local community engagement, impact assessments, and development programs**I**

Bertelsmann also engages in diverse measures and sponsorship programs for integrating and developing local communities at Group, divisional and company level across the world. Media aid and donation campaigns also form important areas of commitment. These include educational and media literacy programs, environmental and climate protection initiatives, and charitable and cultural promotion projects. A record of precise statistics on the percentage of sites pursuing measures of this nature is not available at Group level. However, the company posts news about a broad spectrum of selected projects and initiatives from the Bertelsmann world on its website every day. See link below.

[Projects Worldwide](#)

Aspect: Anti-corruption

G4-DMA Management approach**X**

Bertelsmann is actively committed to combatting corruption. As a participant in the United Nations Global Compact, the company is committed to combatting all forms of corruption. As stated in the Bertelsmann Code of Conduct (p. 19), corruption is not tolerated in any form. Bertelsmann has implemented an anti-corruption program in order to keep employees of the company, and business partners of Bertelsmann, informed on the topic of corruption. This is based on an Executive Board guideline for anti-corruption and

GRI	Indicator	UNGC
	<p>specifically includes training and communication measures, as well as comprehensive speak-up procedures.</p> <p>Anti-Corruption</p> <p>Bertelsmann Code of Conduct, p. 19</p>	
G4-SO4	<p>Communication and training on anti-corruption policies and procedures</p> <p>The Ethics & Compliance department has developed an interactive training program to familiarize Bertelsmann employees throughout the world with the Code of Conduct. The program is available in twelve languages and has been in use since June 2009. All employees received their first training in 2009 and since then refresher courses have been held for all employees at regular intervals. Training measures are offered in a web-based format or at attendance training courses. Participation in Code of Conduct training sessions is compulsory for all Bertelsmann employees (including the Executive Board). The Executive Board and the Supervisory Board regularly receive reports on the volume of training delivered.</p> <p>Training Initiatives</p> <p>FAQ Training Initiatives</p> <p>Since 2012, the general Code of Conduct training sessions have been complemented with training on anti-corruption for managers and employees in functions relevant to this area.</p> <p>Training Initiatives</p>	X
G4-SO5	<p>Confirmed incidents of corruption and actions taken</p> <p>A range of precautionary measures ensures that all reports of corruption incidents are followed up and appropriate measures are taken. The measures include serving notice/suspension from work, other disciplinary measures, requests for compensation, criminal charges, and organizational measures.</p> <p>The Corporate Compliance Committee devolves to the Ethics & Compliance department operational monitoring of the measures adopted and regular reporting on any cases that occur and the action taken to the Executive Board and Supervisory Board.</p> <p>A new Case Management System was developed in 2014 to ensure integrated case recording and documentation. Guidelines on compliance organization and the future role of the Ethics & Compliance Officer will soon be completed.</p> <p>Annual Report 2015 (Financial Information), p. 126: Compliance</p>	X

Aspect: Public Policy

G4-DMA	<p>Management approach</p> <p>Our corporate liaison offices in Berlin and Brussels serve as Bertelsmann's centers of political expertise and as points of contact. Both teams work to provide policymakers in Germany and Europe with qualified dialog partners, the most relevant issues, facts and information.</p> <p>The public affairs managers in the Group and the divisions have agreed on a joint mission statement, which can be accessed transparently on the Bertelsmann website</p> <p>Public Affairs Mission Statement</p>	I-X
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GRI	Indicator	UNGC
	<p>The public affairs managers are reliable points of contact on issues relating to political communication. They represent and communicate the political media, social and business interests and positions of Bertelsmann SE & Co. KGaA and its divisions, and contribute their expertise to debates and decision-making processes inside and outside the company. They conduct an open dialog with stakeholders in policy-making, business and civil society. The most important objectives of the company include respect for and protection of intellectual property, the freedom and independence of the media, and maintaining diversity in the world of culture and publishing.</p> <p>The basis for public affairs work is provided by Bertelsmann's corporate culture, as summed up in the Bertelsmann Essentials: partnership, entrepreneurship, creativity, and citizenship.</p> <p>Bertelsmann SE & Co. KGaA is entered in the Transparency Register of the European Union, and has signed the register's Code of Conduct.</p> <p>Public Affairs</p> <p>Entry in the Transparency Register</p>	
G4-SO6	<p>Total value of political contributions</p> <p>Bertelsmann SE & Co. KGaA does not make donations to political parties.</p>	X
Aspect: Anti-competitive Behavior		
G4-DMA	<p>Management approach</p> <p>Bertelsmann is committed to the competitive principle and condemns competition violations and anti-competitive behavior.</p> <p>Bertelsmann Code of Conduct, p. 20: Fair Competition</p>	
G4-SO7	<p>Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices</p> <p>Bertelsmann investigates and combats every violation of competition law. A comprehensive training program in antitrust law (attendance training sessions, online training courses only as refresher sessions) is designed to avoid violations of antitrust legislation.</p> <p>Bertelsmann and its worldwide operations are exposed to an array of legal and regulatory risks ranging from litigation to diverging interpretations of tax assessment criteria.</p> <p>We provide information about legal and regulatory risks in Bertelsmann's Annual Report.</p> <p>Annual Report 2015 (Financial Information), p. 31: Legal and Regulatory Risks</p>	
Sub-category: Product Responsibility		
Aspect: Product and Service Labeling		
G4-DMA	<p>Management approach</p> <p>Compliance with legal requirements and the highest quality standards for all Bertelsmann companies are fundamental for the manufacture and distribution of products and services.</p>	I-VIII

GRI	Indicator	UNGC
	<p>Responsibility for protecting media users and customers and complying with the attendant regulatory requirements, standards and commitments – also in the area of labeling products and services – is decentralized and rests with the managements of our companies. Across the Group, our conduct is informed by the principles of the Bertelsmann Code of Conduct.</p> <p>Bertelsmann Code of Conduct</p> <p>CR Magazine, p. 53: Fast Read – Protection of Media Users and Customers</p>	
G4-PR3	<p>Principles and procedures for product and service information and labeling</p> <p>Bertelsmann and its companies have a large number of differentiated principles and measures for product labeling to match their diverse range of products and services. These include labeling requirements for areas like protection of minors (e.g. in broadcasting), product safety (e.g. in the production of children's books) and environmental protection (e.g. in the procurement and recycling of paper). The divisions and their companies also identify their products with voluntary disclosures and certifications that extend beyond the statutory requirements relating especially to the broadcasting industry at European and national level (e.g. in the Audiovisual Media Services Directive).</p> <p>Certifications</p> <p>Example from Gruner + Jahr: G+J is accredited with a number of voluntary seals of approval, such as the FSC and PEFC seals for paper. However, this is only explicitly highlighted in France. G+J France also has a CO₂ certificate. In addition, G+J uses the voluntary identification applied by the IVW German circulation auditing organization (IVW = Informationsgemeinschaft zur Feststellung der Verbreitung von Werbeträgern e.V.) for its reported sales figures.</p> <p>Example from RTL Group: M6 in France took the initiative back in 1989 to create a signaling system identifying the target audience of films. The designation of German TV broadcasts is based on the standards of the Self-Regulation Body of the Television Industry (Freiwillige Selbstkontrolle Fernsehen (FSF)).</p> <p>CR Magazine, p. 48: Reliable Protection of Minors</p>	I-VIII

Aspect: Marketing Communications

G4-DMA	<p>Management approach</p> <p>Safeguarding customer privacy and data security, fair marketing, and the protection of media users, especially of minors, are important priorities for the business activities of Bertelsmann. The Bertelsmann Code of Conduct stated the following on p. 28: "We do not knowingly engage in or promote misrepresentation or fraud in the marketing or advertising of our products and services." Furthermore, local businesses are responsible for compliance with national and sector-specific legal regulatory requirements and commitments in advertising and marketing communication.</p> <p>Bertelsmann Code of Conduct, p. 28</p> <p>CR Magazine, p. 53: Fast Read – Protection of Media Users and Customers</p>	I-VIII
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GRI	Indicator	UNGC
G4-PR6	Sale of banned or disputed products <p>Bertelsmann complies with all applicable local, national and international laws and regulations whenever we do business (Bertelsmann Code of Conduct, Article 2.1.1) and Bertelsmann thereby prevents legal violations of these regulations when selling products.</p> <p>At the same time, Bertelsmann defines freedom of expression and opinion together with editorial and journalistic independence as fundamental principles for the production and distribution of Bertelsmann's media products and content (see DMA Freedom of Expression and Opinion). Public debate about media products and content is therefore expressly an impact of our own publishing activities, and is fostered and desired.</p> <p>Example: The Penguin Random House division is currently taking a stand against censorship of publishing through its participation in the "Banned Books Week" initiative. See following link.</p> <p>www.penguinrandomhouse.com/bannedbooks</p>	

Aspect: Customer Privacy

G4-DMA	Management approach <p>When handling customer data and disseminating offerings to potentially vulnerable groups, Bertelsmann operates in a highly regulated area. Compliance with legal requirements and the highest quality standards is a matter of course for Bertelsmann. The company sees it as both a challenge and an opportunity to keep pace with the steadily evolving and different local requirements and regulations – and to remain flexible and competitive in the market at the same time. Responsibility for protecting customers' data is decentralized and rests with the managements of the companies. Across the Group, Bertelsmann's conduct for responsible handling of employees', customers' and other third parties' personal data is informed by the principles of the Bertelsmann Code of Conduct: "When we collect, retain, use or transmit personal data, we do so with great care and sensitivity and in compliance with applicable law and policy" (p. 25). Additional Group-wide policies and procedural and technical management systems have been implemented in the area of privacy and data security.</p> <p>Bertelsmann Code of Conduct, p. 25</p> <p>CR Magazine, p. 53: Fast Read – Protection of Media Users and Customers</p> <p>CR Magazine p. 51ff.: Data Security as a Key Topic, Data: A Matter of Trust. Certified Information Security</p>	I-II
G4-PR8	Substantiated complaints regarding breaches of customer privacy <p>No Group-wide statistics are available on substantiated customer privacy-related complaints at the level of the Bertelsmann Group.</p>	I-II

Aspect: Content Creation

G4-DMA	Management approach <p>For Bertelsmann and its media brands, credibility, reliability and diversity are important</p>	I-II
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GRI	Indicator	UNGC
	<p>factors in the competition for the audience's attention. Editorial freedom forms the business platform for this and it means diversity of opinion, positions and content. The company is aware of and treats with care the responsibility that it, as an opinion maker, has toward the public. Bertelsmann guarantees in-house press freedom with its "editor-in-chief principle". This enables editorial decisions to be made solely by our program managers, free from influence by the Group's owners or managements. Many companies and editors have also implemented further statutes for safeguarding journalistic independence in the day-to-day business. The focus here is primarily on journalistic duty of care, respect for individual rights, dealing with representations of violence, and the protection of minors. These topics are also part of the in-house editorial teams' education and training.</p> <p>See also DMA Freedom of Expression and Opinion.</p> <p>Press Freedom</p> <p>Quality</p> <p>CR Magazine, p. 34f.: Press Freedom</p> <p>CR Magazine, p. 46ff.: Protection of Media Users and Customers</p>	
MSD	Actions taken to improve adherence to content creation values	I-II
M3	<p>Program managers, editors, publishers, authors and proof-readers at Bertelsmann apply and maintain the highest editorial and journalistic standards as a matter of routine in their daily work. Editorial conferences, continuous communication with colleagues in cases of doubt or questions relating to content production, dialog with self-regulatory institutions and with special local supervisory and monitoring bodies are important examples of adherence to these standards. Ethical standards for the production of data are a fixed module in the curriculum for journalists and editors being trained at Bertelsmann. Since 2015, a regular Group-wide debate has been instituted – providing support for routine business practice every day – on topics relevant to ethical standards within the framework of the newly established Bertelsmann working group "Press Freedom."</p> <p>Links to training as a journalist at Bertelsmann:</p> <p>Henri-Nannen School (G+J)</p> <p>RTL Journalists' School</p>	

Aspect: Content Dissemination

G4-DMA	Management approach	I-II
	<p>Press freedom, product quality and protection of media users and customers are also key guiding principles for Bertelsmann and its companies in the context of content dissemination.</p> <p>The management approaches for this are elaborated under the aspects outlined above in the area of product responsibility.</p> <p>Press Freedom</p> <p>Quality</p> <p>Protection of Media Users and Customers</p> <p>The Bertelsmann divisions with media activities have defined the objective of developing packages for people with special needs and promoting freedom from barriers in the</p>	

GRI	Indicator	UNGC
	company's own media. The digitization of media is one of the Group's key strategic priorities and is helping to accomplish this goal. Access to Media	
MSD	Actions taken to improve dissemination and accessibility of content	I-II
M4	<p>Bertelsmann is committed to disseminating content in its media business and achieving the best possible access to content. A particular focus in this area is on accessibility of Bertelsmann's own media and content for people with disabilities.</p> <p>Our news magazine "Stern" has been campaigning for blind and visually impaired people for more than 40 years and it publishes selected articles in Braille in the "Stern-Zeit-Blindenzeitschrift" ("Stern Zeit magazine for the blind"). The magazine provides the articles as free podcasts and audio downloads on the website of the German Central Library for the Blind located in Leipzig. Gruner + Jahr's "Brigitte" magazine has been available entirely in Braille since 2002 and was the first women's magazine to be accessible to the visually impaired in Germany. The RTL Group's channels broadcast subtitled and/or synchronized programs in sign language, and broadcaster M6 in France regularly exceeds the statutory requirements defined by the French government for disseminating subtitled programming.</p> <p>The Group representative body for the employees with disabilities at Bertelsmann looks after the platform Handicap TV in Germany.</p> <p>Access to Media</p>	
Aspect: Media Literacy		
G4-DMA	Management approach	I-II
	<p>Media literacy is a key skill of our time. It has a major impact on educational and development opportunities for children, teenagers and adults, and forms a crucial factor as they develop their social aptitude. As a media company, Bertelsmann is aware of its responsibility and acts in conformity with the principle of "helping people to help themselves." Only those people who experience the potential offered by media early on will become media literate – as active readers and as media users who are digitally skilled, creative and critical.</p> <p>The responsibility for planning and implementing concrete measures and projects is devolved to local level with the divisions and companies. See DMA Local Communities.</p> <p>Media Literacy</p>	
MSD M7	Actions taken to empower audiences through media literacy skills development	I-II
	<p>Bertelsmann is committed to promoting media literacy with diverse initiatives.</p> <p>Media Literacy</p> <p>Examples from the promotion of reading and literacy: Bertelsmann and its divisions take part each year in numerous events on "World Book Day" and in the nationwide "Reading Day" in Germany. Bertelsmann also makes financial donations and non-cash contributions to school libraries in the city of its corporate headquarters, Gütersloh.</p> <p>World Book Day 2015</p> <p>40,000 for Nine Schools in Gütersloh</p>	

GRI

Indicator

UNGC

The Penguin Random House Foundation makes awards to teachers who have used their creativity to instill a love of reading in children by making awards totaling 20,000 dollars every year.

[CR Magazine, p. 25: Promoting Literacy with cash prizes](#)

In 2007, Gruner + Jahr was the main sponsor of “Buchstart”, a long-term project launched in Hamburg to promote early childhood literacy. The publishing house also supports the nationwide early readers’ project “Lesestart” promoted by the German Reading Foundation.

[G+J promoting of reading](#)

Examples from the promotion of online media literacy: Bertelsmann’s media providers have many initiatives in place to promote the online media skills of minors – because beyond being passively protected, children also need to learn to actively and competently handle the online world. The RTL Group, for instance, is a founding member of the EU’s “CEO Coalition to make the Internet a better place for kids” initiative, which develops specific recommendations for the use of digital media. The German TV channel Super RTL supports the EU initiative [klicksafe.de](#), which works to build public awareness for the safe use of the Internet by providing practical services and materials. Super RTL is also a co-founder of the media literacy initiative “[Media Smart](#)” and supports the online search engine [fragFINN.de](#), which allows children to search within an environment of child-friendly websites. In 2015, fragFINN.de won an award in the education category of the “Deutschland – Land der Ideen” (“Germany – Land of ideas”) innovation contest. The Penguin Random House publisher Dorling Kindersley offers a similar platform called [DK FindOut!](#).

[CR Magazine, p. 52: Competent and Safe on the Web](#)

GRI Standard Disclosures supplementary to “in accordance” *core* disclosures

From: Governance

G4-2 Key sustainability impacts, risks and opportunities

Bertelsmann is drawing on a track record of nearly 180 years in meeting the challenges and megatrends of the 21st century: from digitization and globalization to demographic change. The diversity of markets the company operates in internationally requires that the Group’s traditions be reconciled with contemporary expectations and issues.

What are the most relevant social and environmental topics for Bertelsmann and its divisions? In 2014, an analysis conducted with internal stakeholders identified answers to this question. Seven topics were identified as especially relevant: education, press freedom, fair working conditions, protection of media users and customers, health and eco-efficiency.

Bertelsmann continuously pursues the strategic development of its sustainability management. Cross-divisional coordination and collaboration are on the agenda, as are Group-wide targets and transparency in topics identified as priority topics for Corporate Responsibility. In 2015, international, cross-divisional CR working groups were set up for this purpose. Under the heading “Advancing CR at Bertelsmann,” the working groups

GRI	Indicator	UNGC
	<p>analyzed the status quo and requirements, and derived needs for action based on this. The interim results of this process were presented to the Bertelsmann Group Management Committee at year-end. The “Advancing CR at Bertelsmann” project will be continued in 2016.</p> <p>Our Responsibility</p> <p>CR Strategy & Management</p> <p>Topics</p> <p>CR Magazine, p. 14: Corporate Responsibility</p>	
G4-36	<p>Responsibility for economic, environmental and social topics</p> <p>See G4-34.</p>	
G4-38	<p>Composition of the highest governance body and its committees</p> <p>The Members of the Supervisory Boards of Bertelsmann SE & Co. KGaA and Bertelsmann Management SE are highly qualified and have personal expertise and wide experience in management. They come from different countries and have very varied backgrounds and diverse careers. A significant proportion of the Supervisory Board is made up of women.</p> <p>Corporate Governance</p> <p>Members of the Supervisory Board</p> <p>Members of the Executive Board and Group Management Committee</p> <p>Annual Report 2015 (Financial Information), p. 134: Committees of the Supervisory Boards</p>	
G4-39	<p>Independence of the Chair of the highest governance body</p> <p>The functions and responsibilities of the Bertelsmann Executive Board as the executive management body of the company, and of the Supervisory Board as its highest governance body are in each case clearly defined and strictly separated from each other. The Chairman of the Supervisory Board is not simultaneously a member of the Executive Board. In Germany, pursuant to the Stock Corporation Act, a Member of the Supervisory Board simultaneously be a Member of the Executive Board, authorized signatory (Prokurist), or general agent (Generalhandlungsbevollmächtigter).</p>	
G4-45	<p>The highest governance body’s role in the identification and management of sustainability risks and opportunities</p> <p>In accordance with its mandate, the Audit and Finance Committee discussed issues of corporate financing, financial planning and development, fiscal policy, improvement of the internal control system, and compliance within the Group, in particular the compliance structure, as well as any negative deviations of business performance from budgeted performance. Moreover, the Audit and Finance Committee discussed how to manage risks to the Group’s reputation and the issue of integrity within the company.</p> <p>Annual Report 2015 (Financial Information), p. 127ff.: Report of the Supervisory Board</p>	
G4-48	<p>The highest committee or position that formally reviews and approves the organization’s sustainability report</p> <p>Bertelsmann Corporate Responsibility reporting for 2015 was approved by the Chief Human Resources Officer.</p>	

Publication Details

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