

GRI Report 2019

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

www.bertelsmann.com/responsibility

BERTELSMANN

About this Report

Since 2011, Bertelsmann's corporate responsibility (CR) reporting has followed the international standards of the Global Reporting Initiative (GRI), the world's leading framework for sustainability reporting by international companies and organizations, and known since 2016 as the „GRI Standards.“ This report was created in accordance with the GRI Standards: Core option. Supplementary information in conformity with the sector-specific “Media Sector Disclosures” (MSD) are also included. Hyperlinks lead to further information, facts and figures about the responsible conduct of Bertelsmann and its divisions on the corporate website. The report's content was selected based on a relevance analysis of corporate responsibility topics at Bertelsmann, which was carried out with in-house and external stakeholders.

Bertelsmann's GRI reporting also fulfills its obligation, as a UN Global Compact member, to produce an annual Communication on Progress. A separate column in the table highlights the relevant reporting content for each principle. In addition, the environmental data from Bertelsmann's carbon footprint have been fully integrated into its GRI reporting as of 2018. In March 2020, Bertelsmann also published a Combined Non-Financial Statement as part of its Combined Management Report 2019 (pp. 41–46), which complies with the CSR Directive Implementation Act in Germany.



Dear reader,

Like so many companies worldwide, the coronavirus pandemic has confronted Bertelsmann with unexpected challenges. The impact of the crisis on our media, services and education businesses is not yet fully known, but its effects are considerable: for our employees, our customers and partners, and all those who feel a bond toward Bertelsmann.

At the same time, there are countless examples of solidarity across our businesses that demonstrate how creatively and entrepreneurially our employees are addressing the challenges brought on by the crisis: For example at Bertelsmann's Content Alliance in Germany, and their efforts to fight the virus's spread by under the slogan, Together against Corona. Penguin Random House is supporting groups affected by social isolation with book donations and retail book traders through reading campaigns and crowdfunding. Arvato Supply Chain Solutions is enabling the rapid delivery of medical supplies and equipment throughout Europe. And our online education companies are making selected programs available free of charge.

These are only some of the ways that Bertelsmann and its businesses play a role in many areas of daily life and society. They show how we take responsibility to help overcome the coronavirus crisis. Our media outlets, in particular, report, educate and reflect the diversity of opinions in our society, and are an integral and indispensable part of our values.

It is Bertelsmann's responsibility to preserve these values.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Thomas Rabe', written in a cursive style.

Thomas Rabe

Chairman and Chief Executive Officer of Bertelsmann and Chief Executive Officer of RTL Group

P.S. This report also serves as our annual communication on progress on the implementation of the UN Global Compact's Ten Principles.

GRI 102

General Disclosures

GRI Content Index

For the Materiality Disclosures Service, GRI Services reviewed that the GRI content index is clearly presented and the references for Disclosures 102-40 to 102-49 align with appropriate sections in the body of the report. All GRI standards listed in the following GRI content index were published in 2016.



GRI 101 Foundation

GRI Disclosure **UNGC**

GRI 101 Foundation

101 Bertelsmann has taken the content of GRI Standard 101 (Foundation) into account in compiling the GRI Report 2019.

GRI 102 General Disclosures

GRI Disclosure **UNGC**

GRI 102 Organizational profile

102-1 Name of the organization
Bertelsmann SE & Co. KGaA

102-2 Activities, 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 had 126,000 employees and generated revenues of €18,0 billion in the 2019 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.

Media

Bertelsmann’s media businesses are based on the production and acquisition of high-quality information and entertainment content – the basis for creating audiovisual formats, books, magazines, music products, and online services. With the exception of books and music, these products contain advertising as well as editorial content – an important source of revenue beyond the incomes from sales and distribution. All these products are distributed physically or digitally, directly or through service providers. Because media businesses live by the diversity of the content they produce and distribute, good networks of creative talent and content producers are a key success factor.

Services

Companies from a wide variety of industries rely on Bertelsmann’s portfolio of solutions, including telecommunication providers, energy suppliers, banks and insurance companies, as well as e-commerce, IT and Internet service providers. At the core of this segment are services Bertelsmann delivers to the end customers of its clients (“B2B2C services”). Typical support services include supply chain solutions, as well as financial, IT, marketing, and customer relationship management services. These services combine a variety of resources:

GRI	Disclosure	UNGC
	<p>staff resources, technology, and the use of natural resources in the form of energy and materials. While hardware and standard software are sourced from third-party suppliers, software solutions for specialized applications are also developed in-house. In its print operations, Bertelsmann processes materials like paper and ink to produce media and advertising products for business customers – typically advertising flyers, books, catalogs, magazines and brochures – using offset, gravure and digital printing presses by third-party manufacturers. The most important raw material used in the CD, DVD and Blu-ray replication business is polycarbonate.</p> <p>Education</p> <p>With its digital education and range of services focusing on the health and technology sectors as well as in the field of university education, Bertelsmann is shaping work-related learning in the 21st century. The business models in the education segment are based first foremost on the combined deployment of highly qualified employees and innovative technology.</p> <p>Bertelsmann does not offer products that are prohibited by law.</p> <p>More information on brands: see GRI 102-7.</p> <p>Company Profile</p> <p>Annual Report 2019 (Image Section)</p>	
102-3	<p>Location of headquarters</p> <p>Guetersloh, Germany</p>	
102-4	<p>Location of operations</p> <p>Bertelsmann operates in the core business fields of media, services and education in around 50 countries worldwide.</p> <p>More information on the core markets: see GRI 102-6.</p>	
102-5	<p>Ownership and legal form</p> <p>Bertelsmann SE & Co. KGaA is a publicly traded but unlisted partnership limited by shares.</p> <p>Shareholder Structure</p>	
102-6	<p>Markets served</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 businesses in growth markets such as Brazil, India and China and is expanding them in Southeast Asia, Latin America and Africa.</p> <p>More information on the core lines of business and the customers: see GRI 102-2.</p>	
102-7	<p>Scale of the organization</p> <p>The company has 126,000 employees and generated revenues of €18.0 billion in the 2019 financial year.</p> <p>Based on revenue, RTL Group is one of the leading television groups in the broadcasting, content, and digital business, with interests in 68 television channels, eight video-on-demand platforms, 30 radio stations, content production and digital businesses throughout the world.</p>	

GRI	Disclosure	UNGC
	<p>With nearly 300 imprints across six continents, Penguin Random House is the world's biggest trade book publisher by revenue. Each year, Penguin Random House publishes about 15,000 new titles and sells around 600 million print books, e-books and audiobooks.</p> <p>Gruner + Jahr is one of Europe's leading premium magazine publishers. Its magazine portfolio includes established brands such as "Stern," "Brigitte" and "Geo"; young brands like "Barbara," "Guido" and "Wohllebens Welt"; and the French magazine publisher Prisma Media.</p> <p>BMG is an international music company with 19 offices in twelve core music markets, and now represents more than three million songs and recordings.</p> <p>Arvato is an internationally operating service provider that develops customized solutions for different business processes for customers in various industries in more than 40 countries. These comprise Customer Relationship Management, Supply Chain Management, Financial Solutions and IT Services.</p> <p>The Bertelsmann Printing Group unites Bertelsmann's printing activities. They include all the company's gravure and offset printing companies in Germany, the United Kingdom and the United States.</p> <p>Bertelsmann Education Group comprises Bertelsmann's education activities. The digital education and service offerings are primarily in the healthcare and technology sectors, as well as in the field of university education.</p> <p>Bertelsmann Investments bundles Bertelsmann's global start-up investments. The activities are focused on the strategic growth markets of Brazil, China, India and the United States.</p> <p>Revenues by division, region and revenue stream: see GRI 201-1. Bertelsmann Annual Report 2019 (Financial Information), pp. 13, 49 The Group and Its Divisions</p>	

102-8 Information on employees and other workers

Employees by division		
headcount		
	2019	2018
RTL Group	16,264	15,975
Penguin Random House	10,663	10,351
Gruner + Jahr	9,273	10,079
BMG	904	834
Arvato	77,342	67,464
Bertelsmann Printing Group	7,866	8,245
Bertelsmann Education Group	1,834	2,033
Bertelsmann Investments	433	306
Corporate	1,868	1,933

Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31.

GRI

Disclosure

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Employee distribution worldwide

headcount

	2019	2018
Germany	41,942	44,066
Other European countries	42,238	41,235
North Africa	11,741	11,865
Central & South America	4,485	4,493
Africa	15,263	7,061
Asia	9,819	7,728
Australia & New Zealand	959	772

Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31.

Number of full- and part-time employees Germany

in percent

	2019	2018
Part-time	30	30
Full-time	70	70

Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31.

Employees by employment period

in percent

	2019	2018 ¹
Permanent	73	78
Temporary	27	23

Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31.

Employees by employment period and region

in percent

	Permanent men	Permanent women	Permanent total	Temporary men	Temporary women	Temporary total
Germany	39.2	34.9	74.1	12.7	13.2	25.9
Other European countries	32.3	44.9	77.3	9.7	13.0	22.7
North America	41.8	51.0	92.8	2.7	4.5	7.2
Middle- and South America	27.3	52.6	79.9	7.7	12.3	20.1
Africa	19.8	22.0	41.8	36.7	21.6	58.2
Asia	30.2	42.9	73.1	9.3	17.6	26.9
Australia and New Zealand	19.1	36.1	55.2	22.4	22.4	44.8
Total	33.9	39.5	73.4	13.0	13.6	26.6

Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31. Rounding differences may occur.

¹ Rounding differences may occur.

GRI	Disclosure	UNGC
	Information on external employees: see GRI 401 .	
102-9	<p data-bbox="252 360 1337 465">Supply chain</p> <p data-bbox="252 360 1337 465">Bertelsmann has a widely ramified supply chain with only a few main suppliers, including paper and energy suppliers. Most of the services it purchases are creative or other services rendered by humans.</p> <p data-bbox="252 481 863 506">More information on value creation: see GRI 102-2.</p> <p data-bbox="252 521 898 546">More information on paper procurement: see GRI 301.</p>	
102-10	<p data-bbox="252 622 1018 647">Significant changes to the organization and its supply chain</p> <p data-bbox="252 667 1353 808">Effective January 4, 2019, Bertelsmann's global Customer Relationship Management businesses were merged with those of the Moroccan Saham Group. Both partners each hold 50 percent of the shares in the new company Majorel, which is controlled by Bertelsmann. Majorel is fully consolidated in the Bertelsmann consolidated financial statements.</p> <p data-bbox="252 824 1337 891">As part of a strategic realignment of its printing business, Bertelsmann has decided to close the Prinovis site in Nuremberg on 30 April 2021.</p> <p data-bbox="252 907 1337 1048">At the end of December 2019, Bertelsmann announced the planned complete acquisition of Penguin Random House. With the acquisition of the 25 percent stake of co-owner Pearson for 675 million US dollars, Bertelsmann is the sole owner of the publishing group. Bertelsmann closed the complete acquisition of Penguin Random House in April 2020.</p> <p data-bbox="252 1064 1050 1088">Bertelsmann Annual Report 2019 (Financial Information), pp. 11-12</p>	
102-11	<p data-bbox="252 1160 715 1184">Precautionary principle or approach</p> <p data-bbox="252 1205 1353 1563">As a global corporation, Bertelsmann is exposed to a large number of risks, including legal and regulatory risks. Bertelsmann's risk management system (RMS) is designed for the early identification, evaluation of, and handling of internal and external risks. The Internal Control System (ICS) as an integral part of the RMS monitors the effectiveness of the implemented countermeasures. The aim of the RMS is to identify material risks to the Group in good time, so that countermeasures can be taken and the risk can be monitored. Risks are defined as possible future developments or events that could lead to a negative economic forecast or target deviation for Bertelsmann. In addition, risks can negatively affect the achievement of the Group's strategic, operational, reporting and compliance-related objectives, and its reputation.</p> <p data-bbox="252 1579 1353 2085">The risk management process is based on the internationally accepted frameworks of the Committee of Sponsoring Organizations of the Treadway Commission (COSO Enterprise Risk Management – Integrated Framework and Internal Control – Integrated Framework, respectively) and is organized in subprocesses of identification, assessment, response, control, communication and monitoring. A major element of risk identification is a risk inventory that lists significant risks year by year, from each profit center upwards. The risks are compared to risk management measures and control activities to determine the net risk position. Both one- and three-year risk assessment horizons are applied to enable the timely implementation of risk response measures. The basis for determining the main Group risks is the three-year period, similar to medium-term corporate planning. Risk assessment is the product of the estimated negative impact on Group free cash flow should the risk occur and the estimated probability of occurrence. Risk monitoring is conducted by Group management on an ongoing basis. The RMS, along with its component ICS, is constantly undergoing further development and is integrated into ongoing reporting to the Executive Board and</p>	

GRI	Disclosure	UNGC
	<p>Supervisory Board. Corporate Risk Committee meetings are convened at regular intervals to ensure compliance with statutory and internal requirements.</p> <p>One of the 10 principles of the United Nations Global Compact, which Bertelsmann has supported as a member since 2008, is decisive action against corruption. By reporting in accordance with the GRI Standards, Bertelsmann also fulfills its obligation to state, in an annual Communication on Progress, what anti-corruption measures were taken.</p> <p>More information on Bertelsmann's precautionary approach: see GRI 102-15, 102-17, 205, 206.</p> <p>Annual Report 2019 (Financial Information), pp. 30-31.</p>	

102-12 External initiatives

At the Group level, Bertelsmann supports the following external initiatives and their principles. In addition, Bertelsmann companies are involved in other external initiatives at the local level.

- United Nations Global Compact: Bertelsmann has been a member (“signatory” option) of the United Nations Global Compact since 2008.
- UN Sustainable Development Goals (SDGs): As a member of the UN Global Compact, Bertelsmann supports the Sustainable Development Goals adopted by the United Nations in 2015.
- OECD Guidelines for Multinational Enterprises: Bertelsmann largely follows the OECD Guidelines for Multinational Enterprises.
- United Nations Guiding Principles for Business and Human Rights: Bertelsmann is committed to the principles of the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.
- International Labour Organization (ILO): International Labor Organization core labor standards.
- Global Reporting Initiative (GRI): Since 2011, Bertelsmann has based its Corporate Responsibility (CR) reporting on the currently valid international reporting framework issued by the GRI and has been reporting in accordance with the “GRI Standards” since 2017.
- Committee of Sponsoring Organizations of the Treadway Commission (COSO): The risk management process is based on the internationally accepted COSO frameworks.
- German Corporate Governance Code: Bertelsmann largely follows the recommendations of the German Corporate Governance Code for good and responsible corporate governance as amended on February 7, 2017, which was in effect at Bertelsmann at the time the Corporate Governance Report was prepared.

In addition, Bertelsmann participates in relevant non-financial ratings and rankings where its management of non-financial matters is evaluated by third parties. In 2019, the company maintained a gold rating from EcoVadis. Bertelsmann achieved “Prime status” in ISS-oekom’s Corporate Rating 2018 for the Media Sector, and scored a C (“Above Sector Average”) in the CDP rating Climate Change 2018.

[Recent Responsibility Ratings and Rankings](#)

GRI	Disclosure	UNGC
102-13	Membership of associations	
	<u>Memberships of Bertelsmann SE & Co. KGaA</u>	
	AGP - Arbeitsgemeinschaft zur Förderung der Partnerschaft in der Wirtschaft, Kassel	
	American Chamber of Commerce in Germany e. V., Frankfurt a. M.	
	Atlantik Brücke e. V., Berlin	
	BDI - Bundesverband der Deutschen Industrie: Förderkreis der deutschen Industrie, Berlin	
	BDI - Bundesverband der Deutschen Industrie: Kulturkreis der deutschen Wirtschaft, Berlin	
	Charta der Vielfalt, Berlin	
	Deutsch-Französische Industrie- und Handelskammer, Paris	
	ICC Germany e. V., Berlin	
	econsense - Forum Nachhaltige Entwicklung der Deutschen Wirtschaft e. V., Berlin	
	Fördergesellschaft FH Bielefeld e. V.	
	Freunde und Förderer der Staatsoper Unter den Linden e. V., Berlin	
	Freunde und Förderer der Stiftung Jüdisches Museum Berlin e. V.	
	GUG - Gesellschaft für Unternehmensgeschichte, Frankfurt a. M.	
	Gesellschaft für Westfälische Wirtschaftsgeschichte e. V., Dortmund	
	Goethe Institut, Munich	
	Gütersloher Verkehrsverein e. V.	
	Humboldt Universitätsgesellschaft, Berlin	
	Responsible Media Forum, London	
	Schmalenbach-Gesellschaft für Betriebswirtschaft e. V., Cologne	
	Stifterverband für die Deutsche Wissenschaft, Essen	
	Stiftung Familienunternehmen, Munich	
	Stiftung Lesen, Mainz	
	Stiftung Preußischer Kulturbesitz, Kuratorium Museumsinsel, Berlin	
	UN Global Compact, New York	
	Verein der Freunde der Nationalgalerie, Berlin	
	Westfälisch-Lippische Universitätsgesellschaft, Bielefeld	
	Wirtschaft und Wissenschaft für OWL e. V., Bielefeld	
	Wirtschaftliche Gesellschaft für Westfalen und Lippe e. V., Muenster	
	Wirtschaftsinitiative Kreis Gütersloh e. V.: Pro Wirtschaft GT	
	Wittenberg-Zentrum für Globale Ethik e. V.	

GRI 102 Strategy

102-14 Statement from senior decision-maker

See [Chairman's Foreword](#).

102-15 Key impacts, risks, and opportunities

A number of non-financial risks are associated with the Corporate Responsibility (CR) topics that are relevant for Bertelsmann. These risks can arise from the company's own business activities or from its business relationships, and can affect the company or its surroundings and stakeholders. As defined in the German CSR Directive Implementation Act, the major

GRI	Disclosure	UNGC
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non-financial aspects where risks can occur are related to environmental, employee and social matters, respect for human rights, and the fight against corruption and bribery.

For the non-financial matters defined in the German Commercial Code – environmental, employee and social matters, respect for human rights, and the fight against corruption and bribery – no significant risks were identifiable as part of the 2019 reporting (see [Combined Non-financial statement in the Combined Management Report for the 2019 Financial Year](#), p. 42).

Beyond this, there are also risks associated with the CR topics relevant to Bertelsmann that are connected with the company's business activities, business relationships, and products and services, but that are not very likely to have serious impacts. The following risk assessment focuses on these CR risks.

CR Risks for Bertelsmann and its surroundings

CR Risks for Bertelsmann: CR risks that may arise from Bertelsmann as a company include increasing business customer requirements stemming from a range of non-financial topics, the nonfulfillment of which may result in revenue losses. CR issues are increasingly subject to statutory regulations, which can lead to noncompliance penalties linked to loss of trust in various stakeholder groups. Disruption in business processes, such as bottlenecking in the procurement of paper or energy, can arise due to a resource scarcity. In human resources, risks may arise due to inadequate working conditions, with implications such as decreased employee motivation and productivity, inadequate skills due to lack of training, increased illness, or increased staff turnover. Developments in media and social policy, such as in the area of press freedom, also contain potential risks for Bertelsmann's businesses.

CR Risks for Bertelsmann's Surroundings: Bertelsmann's activities, including the supply chain, also have repercussions for the company's surroundings, environment and stakeholders. For instance, working conditions have a direct and indirect impact on the well-being of employees, their individual opportunities, and their family environment. Bertelsmann's business operations also have a reciprocal relationship with the local communities where they operate and with global society. Corruption can impede economic development, contribute to the continuation and growth of poverty, and reduce the equality of opportunity. With regard to human rights, Bertelsmann's journalistic conduct, its creative independence, and its treatment of data in particular affect the state of public information, freedom of opinion, self-determination and democracy. In the environment, the use of resources such as paper influences the survival, development and diversity of ecological systems, and with them, sustainable living conditions. The company contributes to global warming through the direct and indirect emission of greenhouse gases.

Finally, all risks caused by Bertelsmann – and the possible negative impacts on its environment – can also cause risks for the company, affecting such factors as reputation, attractiveness as an employer or business partner, litigation, and inclusion in "do not source" lists and indexes.

An overview of the CR topics relevant for Bertelsmann: see **GRI 102-44, 102-47**.

GRI 102 Ethics and integrity

102-16 Values, principles, standards, and norms of behavior

The new [Bertelsmann Essentials](#), announced in May 2019, describe the company's sense of purpose, common goals and core values. The values of Creativity & Entrepreneurship are at the heart of our daily business. Through their interaction, they reinforce each other and thus form the cornerstones of our corporate culture, which relies on participation and partnership.

GRI	Disclosure	UNGC
	<p>The Essentials are a prerequisite for a corporate culture in which employees, management and shareholders work together successfully, respectfully and trustingly. In the spirit of the Essentials, Bertelsmann is mindful of its impact on society and its environment and seeks to make a positive difference.</p> <p>The Bertelsmann Code of Conduct is the guideline for legal and ethical conduct. It is binding worldwide and for all employees, within the company and toward business partners and the general public. Everyone in the company – employees, the Executive Board and Supervisory Board – is obliged to adhere to the principles stipulated in it. The Code of Conduct is not only a guide to appropriate decision making, but also provides information about the options for seeking advice in the company, and for confidentially and securely expressing concerns about possible misconduct.</p> <p>In addition, the Bertelsmann Supplier Code of Conduct obligates business partners that work for, with, or on behalf of Bertelsmann to observe minimum compliance and ethics standards that correspond to the Bertelsmann Code of Conduct. Bertelsmann also requires its business partners to pass these minimum requirements along their own value chain to any third parties they may use (subcontractors, etc.) to fulfill their contract with Bertelsmann. In the event of breaches of the Supplier Code of Conduct, Bertelsmann reserves the right to make appropriate responses corresponding to the severity of the breach, which may include contract termination.</p>	

102-17 Mechanisms for advice and concerns about ethics

At Bertelsmann, employees, business partners and third parties always have the opportunity to ask questions; to use confidential and secure channels to express concerns about possible misconduct; and to make suggestions for improving compliance processes. Contact points include the Integrity & Compliance department, an online whistleblowing system at www.reportconcerns.com and external ombudspersons appointed by Bertelsmann. All reports submitted are being investigated to ensure adequate response to compliance violations.

More information on Compliance: see **GRI 205**.

GRI 102 Governance

102-18 Governance structure

The pursuit of responsible corporate governance is part of the Bertelsmann identity and an important element of its corporate culture. Bertelsmann SE & Co. KGaA is a capital market-oriented company but is unlisted. The company is therefore not subject to the statutory requirement to issue a formal declaration as per section 161 of the German Stock Corporation Act. Nevertheless, the recommendations and suggestions contained in the German Corporate Governance Code serve as guidelines for Bertelsmann SE & Co. KGaA. As the German Corporate Governance Code in the version adopted by the Government Commission on December 16, 2019, was not yet in effect at Bertelsmann at the time the Corporate Governance Report was prepared, reference is made, as in the previous year, to the German Corporate Governance Code in the version dated February 7, 2017.

Statutory Bodies of the Company

The statutory bodies of Bertelsmann SE & Co. KGaA are the General Meeting, the Supervisory Board and Bertelsmann Management SE as a general partner. Bertelsmann SE & Co. KGaA and Bertelsmann Management SE each have their own Supervisory Boards.

GRI	Disclosure	UNGC
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Tasks and Decision-making Processes

The Supervisory Board of Bertelsmann SE & Co. KGaA supervises the management of the business by the Bertelsmann Management SE and uses its extensive information and control rights for this purpose. In addition, the Supervisory Boards advise the Executive Board on strategic matters and significant transactions. The Executive and Supervisory Boards of Bertelsmann SE & Co. KGaA work in close, trusting cooperation and are able to reconcile the demands of effective corporate governance with the need for rapid decision-making processes. Fundamental matters of corporate strategy and their implementation are discussed openly and coordinated in joint sessions. The Bertelsmann SE & Co. KGaA and Bertelsmann Management SE shareholders exercise their rights and vote at the respective General Meetings.

The Supervisory Board of Bertelsmann Management SE has formed an HR 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 Audit and Finance Committee of the Supervisory Board of Bertelsmann SE & Co. KGaA addresses, among other things, the accounting process and the effectiveness of the risk monitoring and risk management system, the internal control system, and the internal auditing system. It also addresses issues relating to compliance, in particular the effectiveness and proper functioning of the compliance organization and the related topic of integrity within the Group, and reviews the non-financial reporting.

[Annual Report 2019 \(Financial Information\), pp. 140–141](#)

102-20 Executive-level responsibility for economic, environmental, and social topics

The Bertelsmann CR Council, chaired by the Chief Human Resources Officer (CHRO), regularly brings together senior high-ranking representatives from the corporate divisions, holding various functions. Together, they work to advance the strategic development of Corporate Responsibility (CR) at Bertelsmann, and ensure the diversity of perspectives from their businesses is considered. The focus is on organizational implementation of CR, coordination and collaboration across the Group's divisions, and transparency with regard to the main topics prioritized for the Group, its divisions and companies. Specific CR topics are also worked on by cross-divisional working groups and networks.

At the Group level, the Corporate Responsibility & Diversity Management (CR&DM) department, a central staff function of the HR executive portfolio, coordinates and supports the work of the CR Council. It does so in close cooperation with other Group functions such as Reporting, Risk Management, Investor Relations, Corporate Communications, Legal, Integrity & Compliance, and employee representations. CR&DM also handles the Group's CR reporting, its stakeholder dialog on relevant CR topics, and in-house networking and consulting projects on a wide range of CR topics. In the field of Diversity Management, the department works to ensure diversity-friendly framework conditions, and acts as a change agent and support resource for the Group's divisions in promoting employee diversity

In the spirit of the company structure that has evolved at Bertelsmann over the decades, the principle of delegating responsibility applies for CR implementation across the Group: Because Bertelsmann's local Managing Directors know their businesses and the social and ecological environment they operate in best, they are responsible for implementing specific CR measures and projects. Bertelsmann's corporate divisions and companies have their own structures and processes in place for this, in accordance with local requirements.

Responsibilities at Executive Board level are also presented in the respective management approaches.

GRI	Disclosure	UNGC
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[CR organization](#)

102-22 Composition of the highest governance body and its committees

In the 2019 financial year, women comprised 23 percent (previous year: 20 percent) of the Supervisory Board. The average age of Supervisory Board members was 58 (previous year: 56), and 77 percent (previous year: 67 percent) of the Supervisory Board members were German; 23 percent (previous year: 33 percent) were non-German.²

[Annual Report 2019 \(Financial Information\), pp. 150-152.](#)

102-23 Chair of the highest governance body

The respective duties and responsibilities of the General Meeting, the Supervisory Board, and Bertelsmann Management SE are clearly defined and are strictly separated from each other. Simultaneous membership on the Executive Board of Bertelsmann Management SE on the one hand, and on the Supervisory Board of Bertelsmann Management SE or the Supervisory Board of Bertelsmann SE & Co. KGaA on the other, is excluded.

GRI 102 Stakeholder engagement

102-40 List of stakeholder groups

Bertelsmann reaches more than one billion people worldwide with its content, brands and formats. In the process, the company comes into contact with a variety of internal and external stakeholders: In addition to the owning family and the nonprofit Bertelsmann Stiftung, which holds the majority of the company's shares, these include employees and their representatives, business customers and suppliers, consumers, journalists, creative talents, content producers, investors, political decision-makers, and representatives of government agencies, associations and non-governmental organizations.

102-41 Collective bargaining agreement

The Code of Conduct and the Supplier Code of Conduct reaffirm the right to freedom of association and the right to engage in collective bargaining, in accordance with applicable laws and regulations, for all employees of Bertelsmann companies as well as those of business partners.

102-42 Identifying and selecting stakeholders

Bertelsmann prioritizes dialog with stakeholders who have a strong influence on the company's business, social or environmental performance, or on the regulatory framework that governs its activities. The Group also seeks exchange with stakeholders who are significantly affected by its economic, social or environmental contributions and impacts.

102-43 Approach to stakeholder engagement

In its day-to-day business, Bertelsmann is in regular contact with journalists, investors, and customers through its press offices, investor relations department and service centers. Beyond daily press interaction and the many events Bertelsmann organizes, the Annual Press Conference on year-end results, the communications accompanying the publication of

² Previous year's figures adjusted.

GRI	Disclosure	UNGC
	<p>half-year and quarterly figures represent proven formats for contact with media, journalists and investors. Because capital market financing is a major element in the Group's financing strategy, transparency toward the capital market is of great importance for the company's financial security and independence.</p> <p>With the Combined Non-Financial Statement, Corporate Responsibility (CR) topics are reported in the Combined Management Report in the Annual Report 2019 (Financial Information, pp. 41-46). In addition, Bertelsmann regularly carries out relevance analyses to advance the strategic development of CR at Bertelsmann.</p> <p>With regard to the Group's internal stakeholder dialog on corporate responsibility, the company identifies stakeholder groups – for example, for helping determine and implement Group-wide CR focus topics – based on the criteria of relevance, balance, and diversity. Representatives from top and senior management, administrative departments, and the operative businesses are involved, as are employee representatives. Care is taken to ensure diversity regarding management level, internationality, age and gender.</p> <p>More information on the various dialog formats the company maintains to promote regular exchange with employees and their representatives: see GRI 402.</p>	

102-44 Key topics and concerns raised

The following topics that are particularly relevant for Bertelsmann were identified in the most recent Corporate Responsibility (CR) relevance analysis, the validity of which was confirmed by the CR Council in 2019:

- **Integrity & Compliance:** Promoting behavior consistent with the values and principles stated in the Essentials and the Code of Conduct, and building mutually trusting relationships with all employees, customers, business partners, and government agencies, who count on Bertelsmann as a law-abiding partner.
- **Antitrust Compliance:** Promoting fair competition and preventing anticompetitive behavior.
- **Data Protection & Privacy:** Ensuring that customers' confidential and personal information is handled in a secure and legally compliant manner.
- **Diversity:** Recruiting and retaining a diverse workforce and providing equal opportunity to all. Creating an inclusive corporate culture. Valuing different perspectives as the basis for creativity and innovation.
- **Fair Working Conditions:** Ensuring decent working conditions for employees, including job security. Protecting employees' privacy; fair payment; and promoting a fair share of benefits/appropriate participation in the company's success.
- **Creative/Journalistic Independence:** Encouraging creative production and editorial decision making while upholding editorial guidelines and values without interference from media owners; journalistic independence without succumbing to any sort of political or economic influence.
- **Paper:** Sourcing paper from recycled materials and sustainably managed forests.
- **Intellectual Property & Copyright:** Covers topics such as copyright, patents, royalty payments, illegal downloading, counterfeiting and product piracy.
- **Learning:** Fostering learning and training to tackle major entrepreneurial challenges with well-trained employees. Strengthening employees' innovative capacity.

GRI	Disclosure	UNGC
	<ul style="list-style-type: none"> • Content Responsibility: Producing and delivering an output that is fair and protects the right and interests of readers, viewers, listeners and users, including minors and other vulnerable groups. • Employee Participation: Involving employees through employee representatives, employee surveys, performance reviews, as well as employee suggestion schemes. • Health: Providing a secure, safe and healthy environment for all employees. • Anti-Corruption & Bribery: Committing to and ensuring processes to prevent all forms of corruption. <p>Corporate responsibility topics, including non-financial performance indicators, are not directly relevant to business, and are accordingly not part of Bertelsmann’s value-oriented management system. The focus is on sales, operating profit, and optimal capital investment. Due to currently limited measurability, no directly quantifiable statements can be made regarding interdependencies and value increases. For this reason, the non-financial performance indicators are not yet used for the management of the Group.</p> <p>Download Bertelsmann CR Relevance Matrix</p>	

GRI 102 Reporting practice

102-45 Entities included in the consolidated financial statements

All fully consolidated subsidiaries were included in this report. Deviations from the scope of this report are indicated in the text.

[Major subsidiaries and participations \(as of December 31, 2019\)](#)

102-46 Defining report content and topic boundaries

Bertelsmann regularly performs relevance analyses concerning Corporate Responsibility (CR). The most recent relevance analysis involved personal interviews with more than 150 people, i.e. representatives of all major external stakeholder groups as well as of Bertelsmann’s executives and works councils were surveyed on their assessment of 21 selected CR topics. The external stakeholders were asked to assess how Bertelsmann’s business activities impact these CR topics; the executives and works councils assessed their relevance for the businesses. All external participants were interviewed personally using guided interviews. The Corporate Responsibility & Diversity Management department summarized the results in a CR-[Relevance Matrix](#), which was then adopted by the CR Council. The validity of the Bertelsmann CR Relevance Matrix was confirmed by the CR Council in 2019.

More information on the 13 CR topics that were identified in this way: see **GRI 102-44, 102-47**.

102-47 List of material topics

CR Topic at Bertelsmann	GRI Topic Basis: GRI Standards 2016 and GRI Media Sector Disclosures	Boundary/Scope Cf. GRI Standards Glossary 2016, p.17
Integrity/Compliance	Antitrust Compliance	Inside the company
	Anti-corruption	Inside the company, outside the company
Data Protection & Privacy	Customer Privacy	Inside the company

GRI	Disclosure	UNGC
Diversity	Diversity and Equal Opportunities	Inside the company
	Non-discrimination	Inside the company, outside the company
Fair Working Conditions	Employment	Inside the company
	Labor/Management	Inside the company
	Freedom of Association and Collective Bargaining	Inside the company, outside the company
	Child Labor	Outside the company
	Forced or Compulsory Labor	Outside the company
Creative/Journalistic Independence	Freedom of Expression and Opinion	Inside the company, outside the company
	Content Production	Inside the company, outside the company
Paper	Materials	Outside the company
Intellectual Property & Copyright	Protection of Intellectual Property	Inside the company
Learning	Training & Education	Inside the company
Content Responsibility	Marketing and Product Labelling	Inside the company, outside the company
	Content Dissemination	Inside the company
	Media Literacy	Inside the company, outside the company
Employee Participation	Labor/Management	Inside the company
Health	Occupational Health and Safety	Inside the company
Anti-corruption & Bribery	Anti-corruption	Inside the company, outside the company
Further Topics	Energy	Inside the company, outside the company
	Water	Inside the company, outside the company
	Emissions	Inside the company, outside the company
	Effluents and waste	Inside the company, outside the company
	Economic Performance	Inside the company, outside the company
	Local Communities	Inside the company
	Public Policy	Inside the company

102-48 Restatements of information

For environmental data collection: see **GRI 300**.

102-49 Changes in reporting

GRI	Disclosure	UNGC
	None.	

102-50 Reporting period
The reporting period covers the 2019 financial year.

102-51 Date of most recent report
The last Bertelsmann GRI Report was published in June 2019. In addition, CR information is continuously updated on the [Bertelsmann Corporate Website](#).

102-52 Reporting cycle
Annual.

102-53 Contact point for questions regarding the report
Bertelsmann SE & Co. KGaA
Corporate Responsibility & Diversity Management
Marie-Luise Kühn von Burgsdorff
Senior Vice President Corporate Responsibility & Diversity Management
Tel.: +49 (0) 5241-80-75021
responsibility@bertelsmann.com

102-54 Claims of reporting in accordance with the GRI Standards
This report has been prepared in accordance with the GRI Standards: Core option.

102-55 GRI content index
The GRI report includes the GRI content index (pp. 5-57 in this document).

102-56 External assurance
The economic indicators in this GRI report were taken from the Bertelsmann Annual Report 2019, which was audited by the PricewaterhouseCoopers GmbH audit firm.
[Annual Report 2019 \(Financial Information\), pp. 135–141: Auditor's Report](#)

GRI 200

Economic

GRI 200 Economic

GRI Disclosure

UNGC

GRI 201 Economic performance

103 Management approach (including GRI 103-1, 103-2, 103-3)

Bertelsmann's geographic core markets are Western Europe – especially Germany, France and the United Kingdom – and the United States. In addition, Bertelsmann is strengthening its businesses in growth markets such as Brazil, India and China. Bertelsmann aims to achieve a fast-growing, digital, international, and diversified Group portfolio. Businesses in which Bertelsmann invests should have long-term stable growth, global reach, sustainable business models, high market-entry barriers and scalability. The rapidly expanding education business is being developed into the third earnings pillar alongside the media and service businesses. The Group strategy comprises four strategic priorities: strengthening the core businesses, driving the digital transformation forward, developing growth platforms and expanding into growth regions. In the 2019 financial year, the Group continued to focus intensively on implementing the strategy in line with these priorities.

[Annual Report 2019 \(Financial Information\), pp. 5-6](#)

201-1 Direct economic value generated and distributed

Revenues by division

in € millions

	2019			2018		
	Germany	International	Total	Germany	International	Total
RTL Group	2,138	4,513	6,651	2,168	4,337	6,505
Penguin Random House	265	3,371	3,636	257	3,167	3,424
Gruner + Jahr	913	442	1,355	948	492	1,440
BMG	46	554	600	34	511	545
Arvato	1,697	2,478	4,175	1,630	2,470	4,100
Bertelsmann Printing Group	948	620	1,568	966	673	1,639
Bertelsmann Education Group	2	331	333	1	257	258
Bertelsmann Investments	0	13	13	0	12	12
Total divisional revenues	6,009	12,322	18,331	6,004	11,919	17,923
Corporate / Consolidation	-203	-105	-308	-145	-105	-250
Continuing operations	5,806	12,217	18,023	5,859	11,814	17,673

Consolidated revenues by region

in percent

	2019	2018
Germany	32.2	33.2
France	12.3	13.2
UK	6.5	6.5
Other European countries	18.9	18.9

GRI	Disclosure	2019	2018	UNGC
	USA	23.4	22.0	
	Other countries	6.7	6.2	

Revenues by category

in percent

	2019	2018
Rights and licenses	17.1	16.3
Own products and merchandise	24.3	24.6
Advertising	22.5	23.0
Services	36.1	36.1

Bertelsmann seeks to contribute to the future-oriented development of its surroundings through donations, sponsorship and charitable activities, while at the same time securing acceptance and a broad client base. The goal is to reach as many people as possible and to create a positive impact on society.

Bertelsmann Corporate Center donations and sponsorship measures are summarized on the [Bertelsmann website](#).

For donations and sponsorship measures by the divisions in their respective surroundings: see **GRI 413-1**.

For measures to promote media literacy: see MSD Media Literacy.

[Annual Report 2019 \(Financial Information\), p. 47](#)

MSD M1 Significant funding and other support received from nongovernmental sources (ads etc.)

In the 2019 financial year, Bertelsmann generated 22.5 percent (previous year: 23.0 percent) of its revenues from advertising.

GRI 205 Anti-corruption

103 Management approach (including GRI 103-1, 103-2, 103-3) X

Corruption and bribery hinder the development of the economy, deter investors and contribute to the persistence of poverty in many countries. For this reason, many countries have tightened their anti-corruption laws in recent years. In the event of infringement, executives and employees, as well as the company itself, may face considerable consequences under criminal and civil law, such as imprisonment, fines, confiscation of profits, exclusion from tendering procedures and the revocation of permits. Business customers are also increasingly demanding evidence of effective anti-corruption compliance measures as a prerequisite for cooperation. Responsible management must therefore also include measures to prevent corruption.

To avoid violations of laws and regulations, directives, and company guidelines, the Executive Board created a compliance organization. It appointed a Corporate Compliance Committee (CCC) and established an Integrity & Compliance program. It also handles the global management and further development of the issue of corruption prevention. The Integrity & Compliance department is subordinated to the CCC and advises and supports it.

GRI	Disclosure	UNGC
	<p>The head of the Integrity & Compliance department reports to the head of the Corporate Legal Department and Chair of the CCC. The latter, in turn, reports to the Chairman and CEO of Bertelsmann, who is responsible for matters of compliance within the Executive Board. This organization reflects the relevant standards for compliance management systems that contribute toward mitigating risks in various ways. Its basic elements include the Bertelsmann Code of Conduct, the Bertelsmann Supplier Code of Conduct, the compliance guidelines, risk analysis, consultation, communication and training measures, whistleblowing systems, and case management.</p> <p>Bertelsmann complies with all applicable national and international anti-corruption regulations. Bribery and corruption, as well as conduct that could harm the company's assets or those of business partners or third parties, is strictly prohibited. Both the Bertelsmann Code of Conduct and the Executive Board Guideline on Anti-corruption & Integrity expressly prohibit all forms of corruption and bribery. The latter Guideline specifies detailed principles and rules of conduct for complying with applicable regulations. Along with instructions for dealing with officials, and guidelines for the granting or accepting of gifts in the context of business relations, it prescribes appropriate due diligence processes in dealing with third parties. It also describes the reporting channels for suspected violations and seeking advice, as well as other prevention and control measures. The Executive Board Guideline for dealing with alleged compliance violations anchors an obligation to report suspected violations of the prohibition against corruption to the Bertelsmann Corporate Center. Another Executive Board Guideline regulates the compliance organization and the role of compliance officers.</p> <p>The Bertelsmann Supplier Code of Conduct requires Bertelsmann business partners that work for, with, or on behalf of the company to comply with the same strict anti-corruption rules.</p> <p>Major anti-corruption results in 2019 included:</p> <ul style="list-style-type: none"> • Advising executives and employees on the subject of anti-corruption; • Processing reports of suspected violations related to anti-corruption; • Reporting of measures taken as well as case indicators to the Executive Board and Supervisory Board in the Compliance Report. 	
205-2	<p>Communication and training about anti-corruption policies and procedures</p> <p>Local management has a duty to communicate the Code of Conduct and the Group Guidelines. Executives and employees covered by the nomination criteria are trained by means of an e-tutorial. Key measures taken in 2019 included advising and training executives and employees on anti-corruption and the continued Group-wide roll-out of the e-tutorial on this topic.</p>	
GRI 206 Anti-competitive behavior		
103	<p>Management approach (including GRI 103-1, 103-2, 103-3)</p> <p>Bertelsmann is committed to the principle of fair competition and condemns antitrust violations and anti-competitive behavior. The company takes action against any known contravention. An extensive training program (face-to-face training, online training for refresher courses) is designed to prevent antitrust violations.</p> <p>The Executive Board approved a "Group Guideline on Compliance with Antitrust Regulations." There is an obligation to report any antitrust violations. The Corporate Legal Department offers antitrust training programs to corporate divisions and the management and employees of these divisions. A comprehensive compulsory training program for</p>	

GRI	Disclosure	UNGC
	employees working in antitrust-related areas, which was also implemented in 2019, is intended to identify antitrust risks at an early stage and to prevent antitrust violations.	
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices See Annual Report 2019 (Financial Information), pp. 34-35	

GRI 300

Environmental

GRI 300 Environmental

The efficient use of natural resources is at the heart of Bertelsmann’s environmental management. The company strives to minimize environmental impacts resulting from its own production, business, and distribution processes. By conserving natural resources and using them more efficiently, Bertelsmann is thus making an important contribution to environmental and climate protection and to a future worth living in. Resource efficiency is – apart from Bertelsmann’s own aspiration – a requirement business customers place on the company, in particular at Arvato and the Bertelsmann Printing Group’s service businesses: They expect an environmental management system that ensures compliance with both statutory requirements and their own environmental standards and transparency requirements.

Bertelsmann meets these growing demands through transparency regarding its environmental impact along the value chain. Effective environmental management, i.e. measuring and reducing the resources purchased and used, can save costs and decrease the company’s environmental footprint.

The Bertelsmann Environmental Policy, the Bertelsmann Energy & Climate Policy, and the Bertelsmann Paper Policy provide the framework for the Group’s environmental management. Besides this, the company has set Group-wide objectives on climate protection (see **GRI 305**) and paper (see **GRI 301**). Operational responsibility for energy and environmental management lies with the managements of the individual Bertelsmann companies which set their own targets for improving their environmental performance on the basis of local management systems.

The internationally staffed Bertelsmann “be green” working group serves as a platform for cross-divisional environmental commitment. It is managed by a representative from Corporate Responsibility & Diversity Management, a central staff function of the Chief HR Officer. Representatives from the Bertelsmann divisions – e.g. paper buyers, energy and environmental managers, logistics experts, and controllers – regularly coordinate on the latest environmental issues and best practices and engage in dialog with external stakeholders. In addition, the experts in the “be green” working group coordinate the Group-wide collection and reporting of environmental data.

Since 2008, Bertelsmann has compiled Group-wide environmental indicators on energy, greenhouse gas emissions, paper, water, effluents, and waste (see **GRI 301, 302, 303, 304, 305, 306**). These indicators illustrate the development of the environmental impacts of Bertelsmann and its divisions. The activities of the divisions BMG, Bertelsmann Education Group, and Bertelsmann Investments as well as Corporate are summarized under “Other” in this report due to their comparatively low environmental impact.

The basis for environmental reporting is the Group-wide IT platform "green.screen". "green.screen" is a platform for the collection, processing and analysis of environmental data at all levels of the organization. At the same time, more and more Bertelsmann companies use “green screen” for digital energy data management. 336 companies at 520 locations across all divisions were included in this latest data collection. All production and logistics sites, the company’s own computer centers and most of its own and rented office sites were included in the data collection process. The environmental data for employees at the remaining office locations was calculated based on average consumption values, which was the case for 9 percent of staff calculated in full time equivalents.

GRI	Disclosure	UNGC
GRI 301 Materials		
103	<p>Management approach (including GRI 103-1, 103-2, 103-3)</p> <p>Paper, still the most important resource for the traditional print media business, continues to be a particular priority at Bertelsmann. Even in an increasingly digitized media landscape, printed books, magazines, brochures, and flyers will continue to have their place. Therefore, resource conservation, climate protection and waste avoidance play a major role for Bertelsmann across the entire paper value chain. Bertelsmann is committed to responsible</p>	VII-VIII

GRI	Disclosure	UNGC
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paper sourcing, to protect forests which are valuable for climate and biodiversity. In their function as print service providers and buyers, the companies in Bertelsmann's service divisions offer their customers a comprehensive range of sustainably certified and climate-neutral print products.

To complement its environmental policy, Bertelsmann has issued a Paper Policy. For 2020, Bertelsmann set the objective to raise the proportion of recycled paper and paper from certified, sustainable forestry in the paper it purchases itself to over 90 percent. This objective was achieved again in 2019. Recycled paper as well as papers of certified origin that meet FSC®, PEFC™, SFI® requirements or comparable standards are regarded as sustainably sourced paper. In this way, the company advocates for responsible forestry. For example, no wood from primary or protected forests may be used in producing the paper. In addition, Bertelsmann ensures that, in addition to certified wood fiber, the paper used has as high a proportion of recycled material as possible. Above and beyond the Group-wide objective, Penguin Random House aims to switch its paper sourcing to 100 percent sustainable paper by 2025.

For information on the general management approach for environment matters: see **GRI 300**.

301-1	Materials used by weight or volume	VII-VIII
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Paper consumption

in tons

	2019	2018
Total paper consumption	1,681,990	1,834,010
Of which self-purchased paper	1,035,070	1,145,740

Paper consumption by corporate division

in tons

	2019	2018
RTL Group	180	190
Penguin Random House	234,500	263,260
Gruner + Jahr	85,510	106,840
Arvato	18,560	16,920
Bertelsmann Printing Group	1,475,240	1,594,980
Other	40	70
Total paper before consolidation	1,814,030	1,982,260
Consolidated	-132,040	-148,250
Total paper after consolidation	1,681,990	1,834,010

In the 2019 financial year, the amount of paper purchased by Bertelsmann decreased by 8 percent to 1.68 million tons (previous year: 1.83 million tons).

The Bertelsmann Printing Group purchased by far the largest amount of paper, 1.48 million tons in 2019. In addition, Penguin Random House (0.23 million tons) and Gruner + Jahr (0.09 million tons) require large quantities of printing paper. All three divisions recorded a decline in paper volumes compared with the previous year. At Gruner + Jahr, the volume of paper purchased declined by 20 percent due to the sale of Motor Presse Stuttgart and the ongoing realignment of the business. The quantities procured by the Bertelsmann Printing Group for

GRI Disclosure**UNGC**

internal and external productions fell by 0.12 million tons (-8 percent), primarily due to declining business in the gravure printing sector in Germany. In contrast, the 11 percent decline at Penguin Random House can be traced back to the exceptional year 2018, when a particularly large amount of paper was needed due to the market success of Michelle Obama's book "Becoming". As opposed to printing papers, Arvato's logistics business recorded a significant increase in packaging papers, so that the total volume of paper rose by 10 percent to 19 thousand tons of paper (previous year: 17 thousand tons).

301-2 Recycled raw materials used**VIII****Paper consumption and share of recycled and certified paper by corporate division**
in tons

	Total paper consumption	of which recycled	of which certified	of which other
RTL Group	180	70	90	20
Penguin Random House	234,500	7,760	210,910	15,830
Gruner + Jahr	85,510	23,950	58,860	2,700
Arvato	18,560	8,740	1,150	8,670
Bertelsmann Printing Group	1,475,240	251,410	851,480	372,350
Other	40	30	0	10
Consolidated	-132,040	-980	-130,560	-500
Total	1,681,990	290,980	991,930	399,080

In the 2019 financial year, 76 percent of the total amount of paper used was either recycled paper (0.29 metric tons) or certified "virgin" (fresh-fiber) paper (0.99 metric tons). Papers that meet the requirements of FSC®, PEFC™, SFI® or similar standards are shown under certified quantities. About 95 percent of the paper purchased for Bertelsmann's own products such as books and magazines comes from certified forestry or recycled fibers. The remaining 29 percent (0.4 metric tons) of the total amount of paper procured does not meet the above criteria and is therefore reported as "Other." The majority of the quantities in this category are papers supplied by customers outside the Group, which are then used by Bertelsmann printing plants for the printing of books, magazines, catalogs, and brochures ("provisions").

Share of sustainably sourced paper
in percent

	2019	2018
Share of recycled fibers	24	22
Share of certified fresh fibers	72	70
Total	96	92

For quantities of paper purchased by Bertelsmann companies on their own account rather than provided by third parties, special attention is paid to the standards described above. Bertelsmann uses the proportion of recycled paper and certified virgin fiber paper in the total amount of paper it purchases as indicators for a responsible use of natural resources and protection of forests. The proportion of sustainably sourced papers on own account was increased significantly to 96 percent in the 2019 financial year (previous year: 92 percent).

GRI	Disclosure	UNGC
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Bertelsmann thus once again achieved its objective of increasing the proportion of sustainably sourced paper to over 90 percent.

GRI 302 Energy

103	Management approach (including GRI 103-1, 103-2, 103-3)	VII-IX
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Energy and Emissions (see also **GRI 305**) as an environmental factor is a focus of cross-divisional cooperation on environmental and climate protection. Although increasing digitalization is making Bertelsmann less dependent on finite natural resources, it is also increasing energy consumption caused by data use. The collaboration within the Bertelsmann “be green” network covers topics such as increasing the use of renewables and improving energy efficiency. The increasing transparency of energy consumption thanks to the “green.screen” IT platform supports exchange between sites while also enabling site-by-site energy data management, which in turn facilitates energy and cost savings.

The Bertelsmann Energy and Climate Policy describes the framework for energy-efficient and climate-friendly business practices. By purchasing renewable energies, Bertelsmann wants to directly influence the demand for climate-friendly options and thus contribute to the sustainable transformation of the energy markets. The electricity purchased by Bertelsmann companies should always have lower greenhouse gas emissions than the respective national electricity mix and, if economically feasible, should come entirely from renewable sources. In addition, a local on-site generation of our own electricity and heat using renewable energies and, on a transitional basis, highly efficient natural gas-powered cogeneration plants, will help to transform the local energy markets. Bertelsmann does not use lignite or anthracite in producing its own energy, and expects its energy suppliers to gradually phase out fossil fuels.

Information on general management approach to the environment: see **GRI 300**.

302-1	Energy consumption within the organization	VII-VIII
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Energy consumption

in GWh

	2019	2018
Electricity	779	819
Heat	719	739
Fuel	75	74
Energy consumption total	1,573	1,632

Compared with the previous year, total energy consumption fell by 4 percent from 1,632 gigawatt hours to 1,573 gigawatt hours. Electricity consumption fell by 5 percent to 779 gigawatt hours (previous year: 819 gigawatt hours). In 2019, heat consumption fell by 3 percent to 719 gigawatt hours (previous year: 739 gigawatt hours). In the same period, energy consumption from fuels rose slightly by 1 percent to 75 gigawatt hours (previous year: 74 gigawatt hours).

Energy consumption by corporate division

in GWh

	2019	2018
RTL Group	141	146

GRI

Disclosure

UNGC

Penguin Random House	86	101
Gruner + Jahr	43	56
Arvato	337	345
Bertelsmann Printing Group	929	945
Other	37	40
Energy consumption total	1,573	1,632

Bertelsmann's divisions differed significantly in their energy consumption. The Bertelsmann Printing Group accounts for the largest share of total consumption at just under 60 percent, followed by Arvato with around 20 percent and RTL Group with just under 10 percent. In contrast, Penguin Random House (5 percent), Gruner + Jahr (3 percent) and other divisions (2 percent) had comparatively low energy consumption.

Across all divisions, energy consumption at Bertelsmann fell compared with the previous year.

The Bertelsmann Printing Group reduced energy consumption in 2019 by 2 percent compared with 2018. The decline in electricity and heat consumption is largely attributable to production declines in Prinovis Germany's and Mohn Media's printing business. Energy consumption at the US printing plants and Sonopress also fell.

With a 15 percent reduction, Penguin Random House recorded significantly lower consumption. This was mainly due to the closure of a warehouse in the UK and an office location in New York.

Consumption at Gruner + Jahr also dropped significantly (-23 percent), especially due to the sale of Motorpresse Stuttgart and lower power consumption at the main site in Hamburg.

The services division Arvato also recorded a 2 percent drop in energy consumption. Despite the expansion of logistics activities in Poland, energy consumption at Arvato Supply Chain Solutions fell significantly due to the closure of a site in France and successful efficiency measures at German sites. The inclusion of the new Saham sites (see **GRI 102-10**) has significantly increased Majorel's electricity consumption. By contrast, heat consumption at Majorel fell due to the closure of smaller sites in Europe. Arvato Systems and Arvato Financial Solutions also both reported a decline in energy consumption due to site-related energy-saving measures.

Despite increased energy consumption at RTL City in Luxembourg, RTL Group was able to reduce consumption by 3 percent year-on-year thanks to energy savings at Mediengruppe RTL Deutschland in Cologne and RTL Nederland.

Energy consumption in the other divisions also fell compared with 2018.

Fossil fuels and propellants used

in GWh

	2019	2018
Natural gas	1,117	1,149
Diesel	51	55
Heating oil	11	15
Petrol/gasoline	15	11
Other	11	11

GRI Disclosure**UNGC**

In the 2019 reporting year, a total of 1,117 gigawatt hours of natural gas were used for the company's own power generation. This represents a year-on-year reduction of 32 gigawatt hours (3 percent). Natural gas is used in highly efficient combined heat and power (CHP) plants for the production of electricity and heat, as well as in heating systems for the company's own heat generation. Only a small part of the heat generation is carried out with heating oil. The quantity of heating oil decreased by almost 30 percent compared with the previous year, from 15 gigawatt hours in 2018 to 11 gigawatt hours in 2019. Also, many sites are equipped with diesel-powered emergency power generators, which consumed 1.3 gigawatt hours of diesel during regular test runs. In accordance with the Bertelsmann Energy and Climate Policy, no coal is used for generating energy within the Group. The remaining energy from fossil fuels is used for company vehicles, pool vehicles and forklift trucks.

Renewable energy in GWh

	2019	2018
Electricity from renewable sources with certificate of origin	91	67
Total electricity consumption	779	819

The proportion of green electricity with certificate of origin increased significantly last year to 12 percent (previous year: 8 percent). This means that in 2019, 91 gigawatt hours of the electricity consumed came from renewable energies, which corresponds to an increase of 36 percent compared with the previous year (67 gigawatt hours).

302-2 Energy consumption outside the organization**VII-VIII****Business travel**

in millions of kilometers

	2019	2018
Air	226	239
Rail	39	37
Rental car	15	20
Business travel total	280	296

In the reporting year, the distances covered for business travel across the Group declined significantly by 5 percent from 296 million to 280 million kilometers. At 81 percent and 226 million kilometers, air travel accounted for most of the distance traveled. Compared with the previous year (239 million kilometers), it declined by 5 percent. While rental car mileage also fell by 25 percent, environmentally friendly rail journeys increased from 37 million to 39 million kilometers, representing a 5-percent increase for the second consecutive year. The need to change travel habits is explicitly being communicated to employees at many Bertelsmann companies.

Business travel by corporate division

in millions of kilometers

	2019	2018
RTL Group	87	89

GRI	Disclosure	UNGC	
	Penguin Random House	49	55
	Gruner + Jahr	15	27
	Arvato	97	86
	Bertelsmann Printing Group	6	7
	Other	26	32
	Business travel total	280	296

In fiscal year 2019, only Arvato's business travel increased significantly by 13 percent to a total of 97 million kilometers (previous year: 86 million kilometers). Arvato's business trips thus account for the largest share of Group-wide business travel: 35 percent. The increase in air travel at Majorel due to new international locations more than offset the reduced travel activities at Arvato Supply Chain Solutions.

RTL Group recorded a 2-percent decline in travel, to 87 million kilometers (previous year: 89 million kilometers). This corresponds to 31 percent of total kilometers travelled across the Group. The number of kilometers travelled decreased, especially at RTL Hungary, due to significantly less air travel.

Penguin Random House and Gruner + Jahr also significantly reduced the distances traveled. At Penguin Random House, business travel fell by 11 percent, mainly due to the increasing use of video conferencing.

The 44-percent decline at Gruner + Jahr is due to cost-cutting measures and the sale of Motorpresse Stuttgart.

The Bertelsmann Printing Group has a relatively small share of 2 percent of the total number of kilometers traveled. The division recorded a 14-percent reduction from 7 million to 6 million kilometers, mainly due to lower sales activity and increased use of online meetings at Mohn Media and Sonopress.

302-3	Energy intensity	VIII
	The energy intensity, the ratio of the sum of the reported energy-consumption values in megawatt-hours to the total revenues reported in the consolidated financial statements (in millions of euros), remained 5 percent below the previous year's figure at 87.2 (previous year: 92.3).	
302-4	Reduction of energy consumption	VIII-IX
	See GRI 302-1 .	

GRI 303 Water

103	Management approach (including GRI 103-1, 103-2, 103-3)	VII-VIII
	Information on the general management approach for environmental matters: see GRI 300 . Information on the management approach for water: see GRI 306 .	
303-1	Water withdrawal by source	VII-VIII
	Water withdrawal by source in millions of m ³	

GRI

Disclosure

UNGC

	2019	2018
from public utilities	1.41	1.47
from groundwater	2.97	3.02
from rainwater storage tanks	0.00	0.01
Total	4.38	4.50

In the 2019 financial year, water withdrawal fell by 3 percent to a total of 4.38 million cubic meters of water (previous year: 4.50 million cubic meters). The most significant decrease is in water withdrawal from public utilities. This figure fell by 4 percent to a total of 1.41 million cubic meters. The use of groundwater from wells fell by 2 percent from 3.02 million cubic meters in the previous year to 2.97 million cubic meters of water withdrawal in 2019.

Water withdrawal by corporate division

in millions of m³

	2019	2018
RTL Group	2.38	2.34
Penguin Random House	0.12	0.14
Gruner + Jahr	0.09	0.15
Arvato	0.57	0.55
Bertelsmann Printing Group	1.07	1.12
Other	0.15	0.20
Total water withdrawal	4.38	4.50

Water is used to varying degrees in the individual divisions. RTL Group (54 percent) accounted for more than half of the water withdrawal at 2.38 million cubic meters. The Bertelsmann Printing Group accounted for 1.07 million cubic meters, or 24 percent of water withdrawal. The remaining 21 percent were withdrawn by Arvato (13 percent), Penguin Random House (3 percent), Gruner + Jahr (2 percent), and the other divisions (about 3 percent in total).

RTL Group's water withdrawal rose by 2 percent from 2.34 million to 2.38 million cubic meters. This is mainly due to the energy-saving cooling of buildings using wells operated by Mediengruppe RTL Germany in Cologne, a method used more intensively again in the 2019 financial year due to high temperatures. At Arvato, fresh water withdrawal rose 4 percent year-on-year to 0.57 million cubic meters (previous year: 0.55 million cubic meters). The main reason for this is the restructuring at Majorel because of the additional locations of the Saham Group (see **GRI 102-10**) and the acquisition of a location in Mexico.

The remaining divisions each recorded a decline in water withdrawal. At the Bertelsmann Printing Group, it fell by 4 percent from 1.12 million to 1.07 million cubic meters. This is attributable to production declines in Prinovis Germany's and Mohn Media's printing business. Gruner + Jahr reduced its withdrawal by 40 percent, which is primarily related to an improvement in well technology at DDV Druck. At Penguin Random House, the closure of an office location in New York led to a 14-percent reduction in water consumption to 0.14 million cubic meters (previous year: 0.12 million cubic meters).

GRI 305 Emissions

103 Management approach (including GRI 103-1, 103-2, 103-3)

VII-IX

Bertelsmann supports the international community's goal of limiting global warming to below two degrees Celsius. By 2025, the Group aims to reduce its portfolio-adjusted greenhouse gas (GHG) emissions by 20 percent compared with the base year 2014. This objective relates to emissions from the consumption of fuels for our own electricity and heat production (Scope 1) as well as to the consumption of purchased electricity and heat (Scope 2).

The Group-wide objective was achieved ahead of schedule in the 2019 financial year with a reduction of 24 percent compared with the base year 2014. At the end of December 2019, the Bertelsmann Executive Board therefore decided that the company should become carbon-neutral by 2030. The company aims to reduce all greenhouse gas emissions generated by its sites, by the mobility and equipment of its employees and by the manufacture of its own products by 50 percent compared with 2018. Further information on the new climate protection target and the defined fields of action are documented on the company website.

Greenhouse gas emissions reported under the previous emission objective are accounted for in accordance with the "Corporate Accounting and Reporting Standard" and "Scope 2 Guidance," and following the "Corporate Value Chain (Scope 3) Standard" of the Greenhouse Gas Protocol (GHG Protocol). Greenhouse gas emissions are reported in accordance with the GHG Protocol and in CO₂ equivalents (CO₂e). According to the GHG Protocol, emissions are reported in three different scopes. Scope 1 refers to Bertelsmann's direct emissions, which for instance result from its own (on-site) power generation and the operation of printing machines. Scope 2 covers indirect emissions from the generation of purchased electricity and district heating, or heat provided by landlords. In accordance with the GHG Protocol Scope 2 Guidance, Bertelsmann reports both market-based and location-based emissions in the overview of key indicators.

As part of measuring the achievement of the objective, an adjustment is made to take account of portfolio changes. Effects from the sale and acquisition of Group companies are retroactively neutralized each year, and the basic data adjusted accordingly. The environmental indicators also include other indirect greenhouse gas emissions (Scope 3) that are not part of the objective.

305-1 Direct (Scope 1) GHG emissions

VII-VIII

Greenhouse gas emissions
in tons of CO₂e

	2019	2018
Scope 1 total	246,400	256,500
Electricity	65,600	70,900
Heat	160,300	163,400
Transport	20,500	22,200
Scope 2 total ¹⁾	185,500	210,000
Electricity	155,200	175,100
Heat	30,300	34,900
Scope 3 total	1,298,500	1,430,400
Business travel	63,600	67,800

GRI	Disclosure	UNGC	
	Staff commutes	74,500	72,100
	Paper	1,092,900	1,217,800
	Energy-related activities	67,500	72,700
	Total	1,730,400	1,896,900

1) Scope 2 emissions were calculated using the market-based method as indicated in the Scope 2 Guidance of the GHG Protocol. According to the site-based method, Scope 2 emissions amounted to 239,800 metric tons of CO₂e (previous year: 252,000 metric tons).

The sum of direct and indirect greenhouse gas emissions accounted for in 2019 was 1.73 million tons of CO₂ equivalents. This represents a decline of 9 percent compared with the previous year (1.89 million tons). About three-quarters of these emissions were attributable to indirect emissions along the value chain (Scope 3). These emissions fell by 9 percent year-on-year in 2019. The remaining 25 percent of total emissions were attributable to Scope 1 and Scope 2, which show a year-on-year decline of 4 percent and 12 percent respectively.

Scope 1 and 2 emissions

in tons of CO₂e

	2019	2018
RTL Group	33,200	35,900
Penguin Random House	14,500	28,700
Gruner + Jahr	10,000	14,500
Arvato	97,500	96,600
Bertelsmann Printing Group	267,600	278,500
Other	9,100	12,300
Total Scope 1 and 2 emissions	431,900	466,500

The Bertelsmann Printing Group (267,600 tons CO₂e) and Arvato (97,500 tons CO₂e) accounted for the largest share of Bertelsmann's Scope 1 and Scope 2 emissions. In particular, the consumption of electricity, natural gas and heat by printing presses as well as other production facilities and the operation of materials handling equipment at the logistics sites are reflected in the carbon footprint of these services divisions.

The reduction in emissions was due in particular to a decline in production at the printing plants. In addition, the volume of renewable electricity with certificate of origin increased by more than 20,000 megawatt hours compared with the previous year, and now accounts for 12 percent of total electricity consumption (previous year: 8 percent).

At Arvato, emissions rose slightly by 1 percent compared with the previous year. While the logistics division was able to reduce emissions by, among other things, using its own photovoltaic power at sites in the Netherlands for the first time, emissions rose overall at Arvato due to the addition of new Saham Group locations at Majorel (see **GRI 102-10**).

Penguin Random House recorded the largest reduction in Scope 1 and 2 emissions in absolute terms, with a saving of 14,200 tons of CO₂e (49 percent). This is due in particular to the extensive switch to green electricity procurement at the energy-intensive locations in North America, the UK and Spain. In fiscal year 2019, more than 80 percent of the electricity purchased by this division was already sourced from green electricity.

GRI	Disclosure	UNGC																								
	<p>The Bertelsmann Printing Group also recorded a significant absolute reduction in Scope 1 and 2 emissions, with 10,900 tons of CO₂e. This is a decrease of 4 percent. The production declines and process optimizations at Prinovis Germany are the main reasons for this.</p> <p>RTL Group achieved an 8-percent reduction of its Scope 1 and 2 emissions (2,700 tons CO₂e). This was achieved in part by switching to green electricity with certificate of origin at Fremantle in the United Kingdom and Canada. At Gruner + Jahr, the switch to green electricity led to a reduction in emissions at numerous smaller locations as well.</p>																									
305-2	<p>Energy indirect (Scope 2) GHG emissions</p> <p>See GRI 305-1.</p>	VII-VIII																								
305-3	<p>Other indirect (Scope 3) GHG emissions</p> <p>Scope 3 emissions</p> <p>in tons of CO₂e</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">2019</th> <th style="text-align: center;">2018</th> </tr> </thead> <tbody> <tr> <td>RTL Group</td> <td style="text-align: center;">33,500</td> <td style="text-align: center;">35,200</td> </tr> <tr> <td>Penguin Random House</td> <td style="text-align: center;">265,100</td> <td style="text-align: center;">305,100</td> </tr> <tr> <td>Gruner + Jahr</td> <td style="text-align: center;">98,300</td> <td style="text-align: center;">125,200</td> </tr> <tr> <td>Arvato</td> <td style="text-align: center;">106,500</td> <td style="text-align: center;">98,300</td> </tr> <tr> <td>Bertelsmann Printing Group</td> <td style="text-align: center;">784,600</td> <td style="text-align: center;">853,000</td> </tr> <tr> <td>Other</td> <td style="text-align: center;">10,500</td> <td style="text-align: center;">13,600</td> </tr> <tr> <td>Bertelsmann (total)</td> <td style="text-align: center;">1,298,500</td> <td style="text-align: center;">1,430,400</td> </tr> </tbody> </table>		2019	2018	RTL Group	33,500	35,200	Penguin Random House	265,100	305,100	Gruner + Jahr	98,300	125,200	Arvato	106,500	98,300	Bertelsmann Printing Group	784,600	853,000	Other	10,500	13,600	Bertelsmann (total)	1,298,500	1,430,400	VII-VIII
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Bertelsmann (total)	1,298,500	1,430,400																								
	<p>Bertelsmann significantly reduced its recorded Scope 3 emissions by 9 percent, from 1.43 million tons of CO₂e in the previous year to 1.30 million tons of CO₂e in fiscal year 2019. Other indirect greenhouse gas emissions from the production of paper that Bertelsmann buys itself, upstream emissions from energy production (outside of Scope 1 and 2), emissions from business travel, and emissions from employee commuting are reported as part of Scope 3 emissions. At more than 60 percent, the Bertelsmann Printing Group was responsible for the largest share of Scope 3 emissions, followed by Penguin Random House (20 percent). Gruner + Jahr and Arvato also generated high shares, at 8 percent each. The volumes of paper used in the print and publishing businesses and, at Arvato, the emissions attributable to employee commutes, had a particular impact. Scope 3 emissions reported by RTL Group and all other divisions accounted for 3 percent and 1 percent of total scope 3 emissions, respectively.</p>																									
305-4	<p>GHG emissions intensity</p> <p>Specific greenhouse gas emissions (Scope 1 and 2) fell from 26.4 metric tons of CO₂e per 1 million euros of Group revenue in 2018 to 24.0 metric tons of CO₂e per 1 million euros of Group revenue in 2019.</p>	VIII																								
305-5	<p>Reduction of GHG emissions</p> <p>See GRI 305-1, GRI 305-3.</p>	VII-VIII																								

GRI Disclosure

UNGC

Bertelsmann uses CO₂ certificates to offset greenhouse gas emissions, e.g. for the sale of climate-neutral print products and for business travel. In this context, emissions of 18,700 tons were offset in 2019, an increase of 25 percent over the previous year. The climate protection projects supported are certified according to internationally recognized standards. Certificates amounting to some 7,000 tons are the first results of a reforestation project in Brazil exclusively supported by Bertelsmann.

Development of GHG emissions
in tons of CO₂e

	2019	2014
Scope 1 emissions adjusted	228,700	234,800
Scope 2 emissions adjusted	182,600	304,000
Total	411,300	538,800

In fiscal year 2019, Bertelsmann achieved its own objective of reducing portfolio-adjusted Scope 1 and Scope 2 emissions by more than 20 percent in absolute terms compared with the base year 2014. In absolute terms, this represents a reduction from 538,800 tons in 2014 to 411,300 tons in 2019. Scope 1 emissions have decreased by 3 percent, and Scope 2 emissions have fallen significantly by 40 percent. In sum, this is equivalent to a 24-percent decline. Bertelsmann has thus accomplished its objective – to reduce its portfolio-adjusted GHG emissions by 20 percent by 2025 – well ahead of schedule.

All of Bertelsmann’s divisions have succeeded in lowering their emissions since 2014, the base year for the Group-wide objective. In absolute terms, the Bertelsmann Printing Group made the biggest contribution, by eliminating 68,000 metric tons of CO₂e. Besides decreases in production outputs, steady improvements in energy efficiency contributed to this reduction.

At Penguin Random House, the synergy effects from the merger of Penguin and Random House in 2014, and the strong expansion of green electricity purchases in recent years, played a key role in the 64-percent reduction compared with the base year.

GHG emissions at Gruner + Jahr have changed significantly due to the effects of digitalization and portfolio measures. After adjusting for portfolio changes, the division has contributed to achieving the objective with a significant, more than 40-percent reduction in emissions.

RTL Group contributed to the reduction in emissions mainly through efficiency measures and green electricity procurement at several companies. At Arvato, too, emissions, adjusted for changes in the portfolio, have fallen significantly since 2014. The many steps taken to increase energy efficiency and lower energy-related emissions more than compensated for the effects of the organic growth of the logistics services in particular.

GRI 306 Effluents and waste

103	Management approach (including GRI 103-1, 103-2, 103-3)	VIII
	Data on water consumption, wastewater and waste generation is also recorded across the Group in the annual environmental data collection using the “green.screen” IT platform. Based on this data, trends can be discerned and potential for improvement identified. Due to the varying local relevance and regulation of water and waste management, these topics are predominantly handled by the local businesses.	

GRI Disclosure**UNGC****306-1 Wastewater discharge by quality and destination****VIII****Wastewater discharge**in millions of m³

	2019	2018
To public sewers or to third parties	1.41	1.70
To surface water, receiving waters or own wastewater-treatment plants	2.34	2.19
Total wastewater discharged	3.75	3.89

306-2 Waste by type and disposal method**VIII****Total waste**

in tons

	2019	2018
RTL Group	1,900	2,000
Penguin Random House	31,100	28,700
Gruner + Jahr	9,000	10,500
Arvato	38,000	37,800
Bertelsmann Printing Group	215,100	234,000
Other	900	1,400
Total waste	296,000	314,400

In the 2019 financial year, the recorded quantities of waste declined by 6 percent to 296,000 tons across the Group (previous year: 314,400 tons). The Bertelsmann Printing Group's printing plants generated the largest share of total waste at 73 percent. About 93 percent of the waste reported by the printing plants consisted of paper residues, which were forwarded for recycling. Due to drops in production at Prinovis Germany, the Bertelsmann Printing Group's waste volumes were down by 8 percent year-on-year, corresponding to a decline from 234,000 tons to 215,100 tons. At 38,000 tons, Arvato's businesses accounted for approximately 13 percent of the Group's total waste. The volumes reported did not change significantly year-on-year. Penguin Random House accounted for 11 percent of the Group's total waste volumes. Due to increased paper recycling at the warehouses in the United States and Argentina, these volumes rose by 8 percent year-on-year to 31,100 tons (previous year: 28,700 tons). Gruner + Jahr (3 percent) and RTL Group (1 percent) accounted for the remaining waste volumes.

Waste by type of disposal

in tons

	2019	2018
for recycling	284,200	302,900
for disposal	11,800	11,500

GRI	Disclosure	UNGC	
	of which hazardous	1,600	1,600
	Total waste	296,000	314,400

The volume of recyclable waste fell by 6 percent to a total of 284,200 tons in the fiscal year (previous year: 302,900 tons). This decrease was mainly due to production declines at the printing plants. At 96 percent, waste destined for recycling as a percentage of total waste remained consistently high year-on-year. The recyclable waste was either returned to the resource cycle or recycled in waste-to-energy systems. About 70 percent of the recyclable waste consisted of paper residues from the printing plant's production departments. Waste for disposal accounted for about 4 percent (11,800 tons) of total waste, up by 3 percent compared with the previous year (11,500 tons). In 2019 as in the previous year, hazardous waste totaled 1,600 metric tons.

GRI 400

Social

GRI 400 Social

GRI Disclosure

UNGC

GRI 401 Employment

103 Management approach (including GRI 103-1, 103-2, 103-3)

Every day, 126,000 people in about 50 countries work to ensure Bertelsmann's success, growth and continuous development. That's why, for generations, the company has made responsibility toward its employees a priority. Bertelsmann wants to create a working environment of partnership for all employees.

For Bertelsmann, its employees are the key to coming up with successful new ideas and offers. The company must create a motivating environment for them to be creative, innovative and successful. This particularly includes freedom, trust and respect.

In order to be an attractive employer for a diverse workforce, retain employees long-term, and remain competitive, Bertelsmann promotes the development of its employees, and creates the prerequisites that enable Creativity & Entrepreneurship in a fair and healthy workplace setting. Bertelsmann aspires to this all over the world, and must honor widely varying social, economic, regulatory and cultural conditions in the process.

Add to that the fact that employees of all generations increasingly want their employer to offer them meaning in their work. To attract the best talent, employers are expected to have and convey a greater "sense of purpose." Only when people identify with their company and its values and strategic goals, are they able to actively implement and ensure that these goals are achieved. This is especially true in times of change.

Bertelsmann strives to offer its employees fair framework conditions for their work. In addition to the protection of human and personal rights, partnership and trustworthy cooperation with employees and their representations, workplace safety, fair distribution of benefits, flexible working arrangements, and fair treatment of freelancers and third-party service providers are key aspects of fair working conditions at Bertelsmann.

Human Resources (HR) work at Bertelsmann is based on the company's partnership-based identity as codified in the corporate constitution and the Bertelsmann Essentials.

Supplementary regulations are set out in the Bertelsmann Code of Conduct (see GRI 102-16), which is binding for all employees, as well as the Executive Board Guidelines on HR Work.

The Chief HR Officer (CHRO), manages human resources in the best interests of the whole Group. As head of the Corporate HR department, which supports the coordination of tasks and development of relevant HR policy, the CHRO cooperates closely with the HR directors of the divisions. Included in the main areas of responsibility are setting the Group's strategic HR agenda; aligning management development with the Group's strategic priorities, Group-wide learning; ensuring the standardization and IT support of important HR processes, the further development of the corporate culture and the implementation of Corporate Responsibility in the Group.

To ensure the coordination of procedures throughout its decentralized structure, Bertelsmann's HR function is organized according to a "dotted line" concept, with complementary reporting as well as supervisory relationships. This allows Group-wide HR topics to be implemented in accordance with the Executive Board's decisions.

Another important aspect of Bertelsmann's HR work is the exchange of information in committees:

- The HR Committee determines the basic aspects of HR work in the interest of the entire Group. Its members include the CHRO, the heads of HR of the divisions, and senior executives from the Group's Corporate HR department.

GRI	Disclosure	UNGC
	<ul style="list-style-type: none"> • HR Country Coordination Meetings are designed for cross-divisional coordination within a region and ensure the implementation of HR initiatives across the Group. Its members include the heads of HR of the Group’s largest companies or those with the largest number of employees in a specified country. • The Nomination & Compensation Committees of the divisions and Corporate Center decide on the implementation of remuneration and staffing policies in their areas of responsibility. <p>Responsibility for ensuring fair working conditions is decentralized, meaning it lies with the management of the local businesses. Bertelsmann provides Group-wide framework conditions that enable local businesses to fulfill this responsibility. Collective regulations (e.g., Group company agreements) and Executive Board Guidelines on certain topics, like those on remuneration and the use of external employees, are also relevant in this regard. In addition, various formats such as the Bertelsmann Group Dialog Conference, and a working group, deal with topics such as a culture of partnership and fair working conditions. As the key contact person for the various bodies representing employee interests, Bertelsmann's CHRO accompanies or presides over these formats.</p> <p>In addition, there are external regulations, such as the standards of the International Labor Organization, the OECD Guidelines for Multinational Enterprises and Bertelsmann’s voluntary commitment in accordance with the UN Global Compact (see GRI 102-12, 102-16).</p> <p>At Bertelsmann, remuneration issues are an essential part of the topic of fair working conditions. Consistent and transparent remuneration structures are established as a principle within the Group. The design of the compensation system is intended to ensure that remuneration is driven by market, function and performance, taking into account business-specific characteristics. Employee profit sharing at Bertelsmann and numerous subsidiaries in Germany is based on the same criteria as the measurement of variable remuneration components of board members and executives. Many domestic and foreign subsidiaries have similar success and profit-sharing models adapted to local requirements. In 2019, a total of €116 million of the 2018 profit was distributed as part of such schemes.</p> <p>Participation in decision-making processes and the granting of the greatest possible freedom contribute substantially to employee loyalty and satisfaction. To support a healthy work-life balance, this also includes offering employees flexible arrangements about where and when they work. Working-time models that focus on results rather than physical presence, as well as trust-based working hours, are now widespread.</p> <p>The flexibility requirements of a rapidly changing world of work also mean that knowledge and expertise need to be sourced from outside the company to ensure satisfied customers during peak phases. The company relies on staffing agencies and employs external personnel in addition to permanent employees where the specifics of the tasks allow and require this. Bertelsmann defines external personnel as self-employed persons, service providers and consultants, or as agency staff who work for a Group company. The employment of external personnel must be in accordance with the company’s values. The Executive Board Guideline on the Engagement of External Personnel requires standard processes to ensure compliance with legal requirements. This is supplemented by the Supplier Code of Conduct, which also obliges service providers (see GRI 102-16).</p>	
401-1	<p>New employee hires and employee turnover</p> <p>Bertelsmann does not currently publish information on employee recruitment or fluctuation. This data, categorized by age, gender and region, is not yet fully available and of sufficient quality for publication.</p>	VI

GRI	Disclosure	UNGC
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GRI 402 Labor/management relations

103	Management approach (including GRI 103-1, 103-2, 103-3)	III
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Bertelsmann sees the dialog between employee representatives and company management as crucial to the company's success. Additionally, regular dialog with employees and their representatives makes it possible to continually review workplace conditions, identify possible improvements and derive measures. Digital transformation is changing the work environment and every individual's tasks. At Bertelsmann, this process also includes the restructuring of several traditional businesses. Parallel to this, some parts of the company are being dismantled while others reorganize, expand or newly build. Seeing change as both a challenge and an opportunity, the company's management seeks to shape those changes together with employees.

Although, as a media company, Bertelsmann falls under Germany's tendency protections and its Supervisory Board is therefore not subject to statutory co-determination requirements, the company has voluntarily appointed four employee representatives as members of the Supervisory Board of Bertelsmann SE & Co. KGaA. Three of the four are works council members, and one is a member from the Bertelsmann Management Representative Committee. Moreover, managers, employees, employees with disabilities and trainees have different platforms for exchanging ideas, advancing common topics and contributing their concerns. One well-established format is the Bertelsmann Group Dialog Conference, during which works council representatives from Bertelsmann, Mediengruppe RTL Deutschland and Gruner + Jahr meet with the Chief Executive Officer and the Chief HR Officer for consultation and discussion.

Employees are also involved in the development and improvement of working conditions through standardized HR tools (Performance and Development Dialogs, Target Agreements, and Team Talks), as well as the Bertelsmann Employee Survey. The Employee Survey has been a key element of Bertelsmann's corporate culture since 1977. In 2019, the international employee survey was conducted exclusively online for the first time.

402-1	Minimum notice periods regarding operational changes	III
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Bertelsmann's management works to ensure that employees are informed of change processes in as timely a manner as possible and involves employee representatives at an early stage to collaboratively identify the best solutions. In many cases, the company exceeds the statutory requirements set out in provisions such as the German Works Constitution Act. For example, the country's HR managers and works councils, with the involvement of local management, have set up the "BeWege" concept and updated the framework conditions of the Bertelsmann Transfer Company in 2019. Both concepts are designed to actively support the structural transformation of all German companies. For businesses in structural decline with jobs at risk, affected employees receive early consultation at a Development and Transfer Center, where they can also develop additional qualifications for new positions within the Group.

GRI 403 Occupational health and safety

103	Management approach (including GRI 103-1, 103-2, 103-3)
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New ways of organizing work, digital technologies, heavier workloads, demographic change and increasing international pressure to compete have an impact on the health of employees. As the retirement age rises, employees work longer and are faced with ever-increasing demands in their jobs.

GRI	Disclosure	UNGC
	<p>An increase in chronic and mental health disorders, sickness absenteeism and the early retirement of experienced employees are among the challenges that arise from changes in the modern working world. Bertelsmann wants to counter these developments at an early stage and invests in the health of its employees – because healthy, motivated employees are a prerequisite for the company’s success. Health is understood not merely as the absence of illness, but as a complex system of needs, physical, psychological and social resources, ability to cope, and personal goals.</p> <p>With a view to designing a health-promoting work environment and preventing work-related risks of disease, Bertelsmann is expanding its health management system at the German locations. Bertelsmann Health Management has been put in charge of supervising and coordinating the Germany-wide health strategy and associated activities, in conjunction with a cross-functional strategy group. The cross-divisional “Health Community,” which is comprised of health experts, the chairs and representatives of the Corporate Works Councils, the chairs of the Group Representation for Employees with Disabilities, HR managers and representatives for employees with disabilities of the German Bertelsmann divisions and solution groups, plays a key role here. Through targeted networking, it also helps to reinforce uniform standards for all German locations.</p> <p>There are four minimum standards:</p> <ul style="list-style-type: none"> • companies are to train their executives on the subject of health, • set up a working group on health, • inform their employees about health topics and services, • and give them access to company social counseling. <p>The minimum standards form the basis for integrated health management and are supplemented by quality criteria. In 2019, the third Germany-wide survey on the implementation of the minimum standards took place. For the first time, it surveyed the quality criteria as well as the implementation of selected statutory occupational health and safety requirements in the Group companies.</p> <p>Bertelsmann Health Management supports the Group companies in meeting the legal requirement to assess mental stress in the work context. In addition, expert knowledge and experience for a suitable procedure was gathered within the “Health Community” to be incorporated into a practice-oriented toolbox for psychological risk assessment.</p> <p>In 2019, the in-house consultancy for workplace health management (“Health Management Consulting”), initiated in cooperation with Bertelsmann BKK, was further expanded. The aim of this function is to advise the divisions on the development and implementation of workplace health management. In addition to strategic concepts for mission statements and elements of sustainable health management, workshop formats and analysis tools were developed and piloted at selected Bertelsmann companies. “Health Management Consulting” also serves as a central coordinating office for inquiries from the Group companies and communicates services and offers from the various health agents in the Group (e.g. company medical service, occupational safety, etc.).</p> <p>Exemplary Facilities and Services</p> <p>Networking plays an important role in successful health management. Protagonists from the health departments collaborate on health management issues in a strategy group. This group includes the Occupational Safety department, the Company Medical Services, the Bertelsmann BKK company health insurance (with around 7,500 insured employees in Germany), in-house social services, and the Sports and Health department. The Occupational Safety team and Company Medical Services advise many German</p>	

GRI

Disclosure

UNGC

Bertelsmann companies regarding the implementation of occupational health and safety tasks and standards required by the German Occupational Safety Act. The Company Social Counselling team serves employees from about 70 percent of the companies in Germany in matters relating to the personal sphere or the workplace, as well as in health matters. Meanwhile, the Sports and Health department offers more than 10,000 employees in the Guetersloh region an extensive sports program with more than 250 classes per week. A Germany-wide offering of company sports is currently being developed. The focus is on work-related and workplace-oriented measures with a particular focus on back health and relaxation. The chairs of Bertelsmann's Corporate Works Council and Group Representation for Employees with Disabilities, and the Head of the Corporate Responsibility & Diversity Management, are also represented in the Health Management Strategy Group.

403-2 Hazard identification, risk assessment, and incident investigation

Accident statistics

Germany	2019	2018
Employees	42,938	44,099
Number of workplace and en route accidents	598	856
Accidents per 1,000 employees	13.6	19.4
Days incapacitated	14,459	11,937

Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31. Percentages refer to the average number of permanent and temporary employees during the fiscal year.

Paid and unpaid leave

Germany	2019	2018
Ø No. of vacation days per employee	26.6	25.7
Ø No. of days of paid sick leave	13.6	12.9
Ø No. of days of maternity leave	1.1	0.4
Ø No. of days of other paid leave	2.4	2.8
Paid leave	43.7	41.8
Ø No. of unpaid sick days	5.2	4.9
Ø No. of days of other types of unpaid leave of absence	0.9	1.5
Unpaid leave	6.1	6.4
Total sick leave ¹⁾ in %	7.5	7.1

1) Sick leave as defined by Bertelsmann SE & Co. KGaA:

Sick leave quota = average number of sick days / target working days

Target workdays = calendar days - Saturdays/Sundays - public holidays (x = 365 - 105 - 10 = 250)

The average sick days per employee increased by one day compared with the previous year. A trend of increasing absenteeism is also evident in industrialized nations, both in Germany and worldwide. This is partly related to an ageing society and increasing psychological stress in an ever faster changing world of work.

Bertelsmann does not report these figures by gender or with regard to freelance and external/third-party employees, and does not provide any information on deaths. Due to the decentralized organizational structures in the field of occupational health and safety, this

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	information is not centrally available at Bertelsmann. A central collection of this information is not currently planned.	

GRI 404 Training and education

103 Management approach (including GRI 103-1, 103-2, 103-3) I, VI

A company's success is determined by its employees' qualifications and efforts. Major challenges such as the Group's progressive internationalization, the digital transformation of the media and services, and demographic change can only be tackled with an excellently trained workforce.

The rapidly changing business environment constantly gives rise to new challenges for all employees in their workaday routine. Helping to ensure employees' long-term employability by offering lifelong learning programs is both a commitment and a challenge for Bertelsmann. The better we do this, the more successful the business can be, and the more attractive it is for its workforce and for the applicants. Vocational education and training are a long-term investment in the future and the stability of society, for both the company and its employees.

Bertelsmann University

With four different campuses – Strategy, Leadership, Function and Individual – [Bertelsmann University](#) is the central learning organization. It offers excellent learning content and innovative learning formats that systematically advance and develop the competencies and skills of Bertelsmann's employees and executives for future requirements, worldwide and across all divisions. Examples include strategy, leadership, creativity and innovation skills, as well as technology and data skills. Thanks to digital formats, a lot of relevant content is available to every employee, and they can choose when and where they want to learn, depending on their individual needs and organizational requirements.

Bertelsmann University is a main department based at the Corporate Center. It is led by the Chief Learning Officer, who reports to the Chief Human Resources Officer. The Executive Board, Group Management Committee and HR Committee regularly discuss and review the University's orientation and activities. It is also supported by the Divisional Learning Committee, which includes Learning and Development representatives from the divisions.

Training in Germany: A Wide Range of Offers

In Germany alone, the Group offers young people industrial and commercial training options in more than 50 different professions. In addition to traditional apprenticeship programs, this spectrum also includes a variety of dual-study programs. With its nationwide offer, Bertelsmann is one of the country's largest apprentice-training companies and is a protagonist in shaping the vocational training landscape. One of the specific challenges that must be addressed is the future-proofing of training programs to prevail in the intensified competition for highly qualified talent. This requires considering changes in the educational landscape, such as the growing tendency toward academic degrees, as well as structural changes like the digitalization of the Group's businesses. The better this works, the greater the company's contribution to a futureproof society and to qualifying its people. The integration of school-leavers without qualifications and young displaced persons also plays a role here.

The Central Education department is responsible for central training measures at the Gütersloh location. It develops offers based on the company's changing needs and requirements, and ensures that they reflect the company's values of Creativity & Entrepreneurship. The department also works closely with the works council and the

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managing directors and HR managers of the training companies. In Gütersloh alone, more than 650 young people are taking the opportunity to learn a profession or to complete a part-time Bachelor of Arts or Bachelor of Science degree at Bertelsmann. Of these, approximately 200 students are undergoing industrial and commercial training at the Group’s own vocational school.

In 2019 the most important measures in the field of learning were:

- further development of international programs in the fields of leadership, strategy and transformation as well as, against the background of the new Bertelsmann Essentials, formats related to creativity and entrepreneurship;
- expanding the training offering to implement the Group’s strategic priorities;
- promoting the transformation of the learning culture through the development of new interactive learning formats and learning content;
- launch of a new three-year Udacity scholarship program with a total of 50,000 places to strengthen the technology focus in the fields of data, cloud and artificial intelligence; and
- adapting the content of the training and study programs offered in Germany to meet the changing demands of the world of work.

404-1 Average hours of training per year per employee VI

Total training
in hours

2019	2018
325,080	402,462

Basis: all training data entered on the digital HR platform “peoplenet”.

Share of digital learning hours
in percent

2019	2018
33	33

Basis: all training data entered on the digital HR platform “peoplenet”.

Due to a higher degree of individualization, digital further-education measures tend to achieve the learning objective with fewer learning hours. Among other things, this led to a reduction in the number of training hours for all employees throughout the Group from 402,462 (2018) to 325,080 (2019). In addition, employees completed around 27,000 learning hours in 2019 under the Udacity scholarship program.

Bertelsmann does not currently report training hours broken down by gender and other employee categories, since this information is not available centrally. Bertelsmann is continuing to develop its data collection in this respect, and plans to report on this in the medium term.

404-2 Programs for upgrading employee skills and transition assistance programs

Helping to ensure employees’ long-term employability by offering lifelong learning programs is both a commitment and a challenge for Bertelsmann. Bertelsmann University has defined three objectives in its efforts to support employee performance: to build future-oriented employee skills, strengthen the company and leadership culture, and develop the digital

GRI	Disclosure	UNGC
	<p>learning infrastructure. Progress is measured, among other things, by the digitization rate (proportion of digital training hours).</p> <p>Vocational training at Bertelsmann is designed to ensure a supply of well-qualified junior employees for the company's various business fields, and to make it possible to fill vacancies via the in-house job market. In 2019, the number of IT graduates increased again. Other results included:</p> <ul style="list-style-type: none"> • expansion of the range of digital learning content in vocational training and the Group's own degree programs, • adaptation of some training and degrees to changing practical requirements, and • continuation of the one-year qualification program for young refugees in the Gütersloh region ("Be Welcome"), in which 12 young adult refugees from Syria, Iraq, Afghanistan and Bangladesh participated in 2019. Since the program was launched, more than 60 refugees have completed their qualification. <p>Active support is provided with and during the structural transformation of companies (see GRI 402-1).</p>	

GRI 405 Diversity and equal opportunity

103	<p>Management approach (including GRI 103-1, 103-2, 103-3)</p> <p>A varied and diverse workforce has a positive impact on creativity, innovation and performance, as well as employee motivation. It enhances flexibility and success in the different markets. With their individual skills, experience and viewpoints, heterogeneous teams contribute to a diversity of perspectives in their company – with positive implications for business processes and decisions. Diversity management also helps counter risks resulting from demographic change and to strengthen employer attractiveness. Additionally, it addresses the economic risks that arise when contracting governmental authorities require statutory quota compliance in public procurement processes, or with business partners having specific contractual requirements.</p> <p>For Bertelsmann, diversity of its workforce is a prerequisite for long-term business success. This is also expressed in the Diversity Statement adopted by the Executive Board in 2018. The Bertelsmann Code of Conduct codifies the promotion of diversity by mandating respectful and appreciative treatment of all employees. The same is true for the Bertelsmann Supplier Code of Conduct (see GRI 102-16). The Executive Board Guideline on Principles of Hiring Policy also serves as a guideline for addressing diversity. Beyond this, Bertelsmann's overall diversity strategy takes its cue from legal regulations regarding inclusion and equal opportunity, even when the company does not fall within their scope.</p> <p>The Executive Board bears the strategic responsibility for diversity within the Group. The diversity strategy is implemented by the Corporate Responsibility & Diversity Management department with support from a Group-wide and other divisional working groups. The focus is on "Gender," "Disability", "Sexual Orientation/Identity," "Nationality and Ethnic/Social Origin," and "Generations". To enhance diversity at the management levels, Bertelsmann aims to achieve the goal of having women occupy one-third of positions in top and senior management across all divisions by the end of 2021. To fulfil this target in top and senior management, the targeted proportion of women in the respective Group-wide talent pools was set at one-third, and was increased to 50 percent in the career development pool. These targets were reached in 2019 for all three talent pools.</p> <p>In 2019, the Bertelsmann Action Plan for Inclusion (2019-2024) for Bertelsmann's German companies was published and further Unconscious Bias trainings were rolled-out. In addition,</p>	I, VI
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a pilot project for the establishment of cross-divisional employee networks and the Bertelsmann Diversity Conference 2020 were prepared.

As role models, managers and HR managers at Bertelsmann have a particular responsibility to demonstratively model and practice diversity. In line with the Group's policy of decentralization, specific measures are implemented in a division or company as most suitable to the business model.

Gender-neutral compensation

The equal treatment of women and men set out in the Code of Conduct explicitly applies to compensation. Bertelsmann's remuneration policy is to establish consistent remuneration structures in the Group. The design of the compensation system is intended to ensure that remuneration is exclusively driven by the market, function and performance – and is therefore gender-neutral. Where explicit employment descriptions or compensation exist, these are likewise completely gender-neutral. Men and women in comparable markets, in comparable positions and delivering the same performance have equal earning opportunities.

405-1 Diversity of governance bodies and employees**Ratio of female / male staff**

in percent

	Supervisory Board		Executive Board		GMC		Top-Management ¹⁾ ₂₎		Senior Management ¹⁾ ₃₎		Employees	
	2019	2018 ⁴⁾	2019	2018	2019	2018	2019	2018	2019	2018	2019	2018
Women	23	20	0	20	38	35	21	17	29	27	53	53
Men	77	80	100	80	62	65	79	83	71	73	47	47

Basis: employees on permanent and temporary contracts, including trainees, as of December 31.

1) Top and senior management include those positions that are of particular importance because of their success-critical function and their strategic relevance for the Group's continued transformation and the achievement of its strategic targets. Top management positions also include the GMC positions, but not the Executive Board positions.

2) Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31, with gender indication 2019 (90%), with gender indication 2018 (92%), limited comparability.

3) Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31, with gender indication 2019 (90%), with gender indication 2018 (91%), limited comparability.

4) Figures adjusted.

Average age

in years

Supervisory Board		Executive Board		GMC	
2019	2018	2019	2018	2019	2018
58	56 ¹⁾	51	51	53	54

As of December 31.

1) Figure adjusted.

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Age distribution

in percent

	Supervisory Board ¹⁾		Executive Board ¹⁾		GMC		Top Management ^{2) 3)}		Senior Management ^{2) 4)}	
	2019	2018 ⁵⁾	2019	2018	2019	2018	2019	2018	2019	2018
≤ 25 years	0	0	0	0	0	0	0	0	0	0
26 - 30 years	0	0	0	0	0	0	1	0	0	1
31 - 35 years	0	0	0	0	0	0	2	1	2	6
36 – 40 years	0	0	0	0	0	0	6	5	11	11
41 – 45 years	0	13	0	0	13	6	14	20	21	21
46 – 50 years	15	13	50	60	38	41	24	24	29	30
51 – 55 years	31	27	50	20	31	18	25	30	24	20
56 – 60 years	31	27	0	20	0	18	18	13	11	10
61 – 65 years	0	0	0	0	6	6	7	5	2	3
> 65 years	23	20	0	0	13	12	2	2	1	0

Rounding differences may occur.

1) Basis: members of the bodies as of December 31.

2) Top and senior management include those positions that are of particular importance because of their success-critical function and their strategic relevance for the Group's continued transformation and the achievement of its strategic targets. Top management positions also include the GMC positions, but not the Executive Board positions.

3) Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31, with age indication 2019 (86%), with age indication 2018 (89%), limited comparability.

4) Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31, with age indication 2019 (74%), with age indication 2018 (78%), limited comparability.

5) Figures adjusted.

Age pyramid employees worldwide

in percent

	2019		2018	
	Men	Women	Men	Women
≤ 25 years	9.3	10.7	6.8	9.5
26 – 30 years	8.2	10.0	7.4	10.1
31 – 35 years	6.8	8.0	6.9	8.3
36 – 40 years	5.5	6.4	5.9	7.0
41 – 45 years	4.5	5.2	4.9	5.5
46 – 50 years	4.2	4.4	4.6	4.9
51 – 55 years	3.8	4.1	4.2	4.5
56 – 60 years	2.9	2.8	3.0	3.0
61 – 65 years	1.3	1.2	1.3	1.3
> 65 years	0.4	0.4	0.5	0.4
Total	46.9	53.1	45.5	54.6

Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31. Temporary employees of RTL Group are not included. Rounding differences may occur.

In the 2019 financial year, Bertelsmann employed people from some 180 nations (previous year: around 180).

Number of nationalities represented in the GMC

2019	2018
6	6

As of December 31.

Internationality quota
in percent

	Supervisory Board		Executive Board		GMC	
	2019	2018 ¹⁾	2019	2018	2019	2018
German	77	67	100	100	69	71
Non-German	23	33	0	0	31	29

As of December 31.

1) Figures adjusted.

Proportion of people with disabilities in the company’s total workforce in Germany
in percent

2019	2018
4.6	4.9

Basis: employees on permanent and temporary contracts, excluding trainees, as of December 31.

With a slight decrease in the number of employees at German sites, the ratio of severely disabled employees has also fallen. As the adoption of the Action Plan for Inclusion (2019-2024) for German companies clearly shows, Bertelsmann is pursuing the goal of increasing the proportion of severely disabled employees.

GRI 406 Non-discrimination

103 Management approach (including GRI 103-1, 103-2, 103-3) **I-II, VI**

The Code of Conduct and the Supplier Code of Conduct (see **GRI 102-16**) contain a clear prohibition of discrimination and intimidation, which is also expressed in the Bertelsmann Diversity Statement. In addition to the aforementioned reporting channels, AGG contact persons have been appointed at all German locations. Employees can contact them in the event of suspected breaches of Germany’s General Equal Treatment Act (AGG). Employees are informed about their rights under the AGG by means of brochures, posters and information provided on the company intranet. In an international context, the topic of antidiscrimination was addressed in a Group-wide e-learning designed to build employee awareness of the issue and advise them of their rights. Ongoing activities were continued in 2019.

406-1 Incidents of discrimination and corrective actions taken **I-II, VI**

Bertelsmann does not report case numbers, since such incidents are subject to special confidentiality requirements. All reports of suspected compliance violations received are reviewed and examined in accordance with the procedures laid down in the Group Guidelines. If an infringement is confirmed, appropriate remediation measures are taken. Details on case categories, case numbers and total numbers of reports received are regularly reported to the Bertelsmann Corporate Compliance Committee and the Executive Board as

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well as to the Audit and Finance Committee of the Supervisory Board. Further details on this are subject to trade secrecy provisions.

GRI 407 Freedom of association and collective bargaining**103 Management approach (including GRI 103-1, 103-2, 103-3)****I-III**

The protection of human rights within the company and in the supply chain is a priority for Bertelsmann. Bertelsmann is committed to the principles of the Universal Declaration of Human Rights and the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, and the International Labor Organization (ILO) core labor standards. Ensuring fair working conditions is an integral part of Bertelsmann's corporate culture. Bertelsmann sets binding human rights standards in the company as well as in the global supply chain, which must be adhered to by all employees and business partners. Key corporate guidelines that address the issue of human rights and codify these standards are the Bertelsmann Code of Conduct, the Bertelsmann Supplier Code of Conduct as well as the Executive Board Guideline on Anti-corruption & Integrity (see GRI 102-16). The Code of Conduct and the Supplier Code of Conduct reaffirm the right to freedom of association and the right to engage in collective bargaining, in accordance with applicable laws and regulations, for employees of Bertelsmann companies as well as those of business partners. At Bertelsmann violations of this principle may be reported via the aforementioned whistleblowing channels, both by employees and by third parties (see **GRI 102-17**).

407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk**I-III**

See GRI 407.

GRI 408 Child labor**103 Management approach (including GRI 103-1, 103-2, 103-3)****I-II, VI**

Bertelsmann does not tolerate child and forced labor, and expects its business partners to share this position. The Code of Conduct and the Supplier Code of Conduct contain accordingly explicit prohibitions (see **GRI 102-16**). In addition, individual Bertelsmann Group companies as well as Bertelsmann itself have issued [statements in accordance with the "UK Modern Slavery Act"](#) that condemn all forms of modern slavery, coercive and child labor, exploitation, and discrimination, and present measures to prevent these human rights violations.

408-1 Operations and suppliers at significant risk for incidents of child labour**I-II, VI**

See **GRI 408**.

GRI 409 Forced or compulsory labor**103 Management approach (including GRI 103-1, 103-2, 103-3)****I-II, IV**

See **GRI 408**.

GRI	Disclosure	UNGC
409-1	<p>Operations and suppliers at significant risk for incidents of forced or compulsory labor</p> <p>See GRI 408.</p>	I–II, IV
MSD Freedom of expression		
103	<p>Management approach (including GRI 103-1, 103-2, 103-3)</p> <p>The media report and entertain, clarify, put things in context, and reflect a diversity of opinions. This makes them an integral and indispensable part of the various social orders. As an international company, Bertelsmann sees censorship and attempts at political influence-mongering in its markets as a risk to its media businesses, and resolute opposition to it as an opportunity. Regarding content, maintaining independence from advertising business partners is a continual challenge. Bertelsmann is aware of the responsibility it has toward the public in its role as an opinion-shaper, and handles this responsibility with care.</p> <p>Bertelsmann stands for editorial and journalistic independence as well as for freedom of the press and artistic freedom. The Group publishes a wide variety of opinions and positions. These basic principles for business activities are set forth in the Bertelsmann Code of Conduct (see GRI 102-16). Bertelsmann interprets this independence in two directions: Inside the company, it means that our management neither attempts to influence the decisions of artists, editors, and program managers, nor to restrict their artistic or editorial freedom. In accordance with the Bertelsmann “Editor-in-chief Principle,” editorial decisions are the sole responsibility of the content managers. To the outside, this means that the company does not capitulate to political or economic influence in its coverage, and complies with existing laws regarding the separation of editorial content and commercial advertising. The company thus aspires to always deliver carefully researched, high-quality coverage, and maintain transparency regarding any mistakes. Clean journalistic craft counteracts online disinformation (“fake news”).</p> <p>Above and beyond the Bertelsmann Code of Conduct, many subsidiaries and their editors and creative departments continued to implement their own statutes and rules to safeguard editorial and artistic independence in their day-to-day business and to develop these further where necessary in 2019. These statutes focus primarily on duties of care, respect for privacy, and dealing with the representation of violence and the protection of minors – topics that are also part of our in-house training for editors.</p> <p>Representatives from the Bertelsmann divisions regularly meet in a cross-divisional working group to discuss matters relating to press freedom and editorial and journalistic independence, as well as to share information, ideas and best practice. An RTL Group editor-in-chief heads this working group.</p>	I–II
MSD Intellectual property		
103	<p>Management approach (including GRI 103-1, 103-2, 103-3)</p> <p>Bertelsmann’s businesses develop, produce, transfer, license, and sell products and services that are protected as intellectual property. For Bertelsmann, the protection of intellectual property rights is fundamental to its business success. For this reason, the company is committed to a high level of global copyright protection worldwide, and fair competition in the digital market. The Copyright task forces across the Group, with representatives from the relevant corporate divisions, monitor current developments in copyright and develop joint positions – for example, on EU copyright law.</p>	I–II

GRI 413 Local communities

103 Management approach (including GRI 103-1, 103-2, 103-3)

I

Bertelsmann sees itself as part of society. Responsibility is deeply rooted in its corporate culture and, with it, the daily activities of the Group, its divisions and companies. This is enshrined in the Bertelsmann Essentials, which focus on the values of creativity and entrepreneurship. In the spirit of the Essentials, Bertelsmann is mindful of its impact on society and its environment, and seeks to make a positive difference. This also includes the Group contributing its media, services and education competence, the expertise of its employees, and financial assistance where help and support are needed outside the company.

As a media, services and education company, Bertelsmann's activities are interwoven with societal development around the world. Society and our employees expect the company to play an active role beyond its own businesses. Bertelsmann's corporate social responsibility efforts, on the Group (see **GRI 201-1**), divisional and company level, encompass a wide range of measures and sponsorship programs that involve and develop local communities. These efforts pay dividends for the company's success by supporting its "license to operate"; that is, enhancing the community's acceptance of Bertelsmann.

Donations, sponsorship, funding for charitable projects and memberships are an expression of responsible behavior and support Bertelsmann's role as a good corporate citizen worldwide. Carefully planned and professionally implemented support measures boost the company's reputation and anchor Bertelsmann as a responsible partner.

The Executive Board's Guideline on Donations, Sponsorships and Memberships ensures that support measures in the form of donations, sponsorship and membership comply with legal and fiscal requirements and are consistent with the company's strategy.

In line with the principle of decentralization, the divisions independently select sponsorship projects and donations, steered by the Executive Board Guideline and in coordination with Corporate Communications. The Chair and CEO decides on one-off donations and sponsorships exceeding €100,000, as well as regular commitments exceeding €50,000. All commitments must be reported annually to the Group tax department to fulfill related due diligence and compliance obligations with the Executive Board. Group companies are also required to define and document their donation activities and sponsorship concepts and keep these documents for a period of five years. The general prerequisites of the Executive Board Guideline on Anti-corruption & Integrity are thus complied with. Any cases of doubt are coordinated and clarified with the Integrity & Compliance department.

Based on the Executive Board Guideline on Donations, Sponsorships and Memberships, Bertelsmann's priorities for its corporate citizenship activities are as follows:

- Education, especially for socially disadvantaged groups and media-related issues (e.g., reading promotion, media literacy);
- Culture, particularly promoting cultural heritage and newcomers in fields closely associated with Bertelsmann (e.g., literature, TV, movies);
- Academic Research, especially on topics closely associated with Bertelsmann, such as economic and social sciences, as well as media and communications science;
- Freedom in creativity and media, especially freedom of expression and press freedom, protection of intellectual property, content responsibility, and editorial independence;
- Networking activities with relevant stakeholders.

GRI	Disclosure	UNGC
413-1	<p>Operations with local community engagement, impact impacts on local communities</p> <p>As a good corporate citizen, Bertelsmann is especially committed to the locations where its companies operate, giving preference to organizations and initiatives in which Bertelsmann employees are actively involved. The company also supports humanitarian disaster relief efforts.</p> <p>Corporate Center donations and support measures are summarized on the Bertelsmann website.</p>	I
GRI 415 Public policy		
103	<p>Management approach (including GRI 103-1, 103-2, 103-3)</p> <p>The creative industry is an engine for economic growth and jobs. To ensure the continuation of investment in high-quality creative and professional content, Bertelsmann advocates for strong copyright protection and a convergent media order in the digital age.</p> <p>Bertelsmann’s public affairs managers offer political decision-makers access to expert dialog partners within the Group, communicate the latest positions and facts, and provide helpful information. Joint positions are developed by in-house working groups and through associations, taking into account external expertise.</p> <p>In addition to functioning as a discussion forum and committee of experts, Bertelsmann’s liaison offices in Brussels and Berlin, and the divisional public affairs officers, introduce policymakers to the Group’s various business models in the media, services and education sectors. Their activities include presenting Bertelsmann’s digital businesses and the international media group’s cultural activities. Bertelsmann SE & Co. KGaA is registered in the Transparency Register of the European Union and is a signatory to its Code of Conduct.</p>	I–X
415-1	<p>Political contributions</p> <p>Bertelsmann does not donate to politicians, political parties or organizations affiliated with parties. Similarly, it does not support organizations and institutions whose fundamental position conflicts with liberal-democratic principles, or which allow or imply discrimination against people. Bertelsmann also does not engage in sports sponsorship.</p>	X
GRI 417 Marketing and labeling		
103	<p>Management approach (including GRI 103-1, 103-2, 103-3)</p> <p>In their production and distribution of products and services as well as in their advertising and marketing communications, all Bertelsmann companies comply with legal provisions and the highest quality standards as a matter of course. The Bertelsmann Code of Conduct (see GRI 102-16) codifies this as a binding principle. Responsibility for the protection of media users and customers, as well as compliance with related requirements, standards and commitments, rests with the management of the individual companies. Bertelsmann and its companies use a variety of principles and procedures for product labeling, reflecting the diversity of their products and services. Especially relevant areas where labeling is used include the protection of minors (see MSD “Content creation and dissemination”), as well as environmental and climate protection (see GRI 300).</p> <p>Product safety is a focus topic that plays a special role in the production of children’s books at Penguin Random House. The company adheres to the strictest safety standards in</p>	I–VIII

GRI	Disclosure	UNGC
	connection with the manufacturing and production of its books, toys and related products to ensure that all Penguin Random House products are risk-assessed and safety tested for such things as choking hazards and toxicity.	
417-1	Requirements for product and service information and labeling See GRI 417 .	

GRI 418 Customer privacy

103	<p>Management approach (including GRI 103-1, 103-2, 103-3)</p> <p>In the production and distribution of its media, services and education, Bertelsmann deals with customer data. In the service segment particularly, many of the world's largest corporations entrust our company with parts of their value chain, such as the management of supply chains or customer communications. Careful and confidential handling of personal data also plays a decisive role in contact with media users.</p> <p>Privacy is a fundamental human right. The objective of customer data protection is to protect people's right to determine who has what knowledge about them, and when. This also means that personal information, or information that could identify a person, must be handled in accordance with legal requirements and adequately protected against unauthorized access. Bertelsmann therefore attaches great importance to customer data protection. Customer data protection covers the protection of personal data of our own customers as well as the protection of personal data provided to Bertelsmann by business partners about their customers. In addition to the legal requirements and the Bertelsmann Code of Conduct and Supplier Code of Conduct, customer data protection within the company is governed by the Executive Board's Information Technology and Information Security Policy, the Bertelsmann Cloud Policy and, for the German companies of the Bertelsmann Group, by the "Corporate Privacy Handbook".</p> <p>Bertelsmann operates in a highly regulated environment as pertains to handling customer data. In all the core countries where Bertelsmann does business the protection of customer data is required by law, and compliance with it is also an integral part of the company's identity. European legislators in particular are enforcing further data protection regulations against the background of Economy 4.0. and stipulate heavy fines for serious infringements within the framework of Europe's "General Data Protection Regulation" (GDPR).</p> <p>Responsibility for customer data protection is decentralized and rests with the management of the individual subsidiaries. To ensure compliance with data protection law governing customer data protection, subsidiaries have a Group-wide data protection management system that addresses in particular implementation of the documentation and accountability obligations under GDPR. In addition, German subsidiaries have a data protection organization consisting of central data protection officers and local data protection coordinators. The latter report to the local management, as well as annually or on an event-driven basis to the central data protection officers, who in turn report to the Executive Board. A similar organization exists in subsidiaries outside Germany. An information security management system (ISMS) based on industry-standard ISO 27001 creates the technical and organizational framework for confidential data processing. The ISMS features a regular and structured survey of relevant processes and procedures to ensure compliance with statutory information security requirements, a systematic recording of risks, and the derivation and monitoring of related mitigation measures.</p>	I-II
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GRI	Disclosure	UNGC
418-1	<p>Substantiated complaints concerning breaches of customer privacy and losses of customer data</p> <p>In the divisions that are subject to the General Data Protection Regulation, 66,991 employees (previous year: 54,448) were trained in data protection and privacy in 2019. That year, there were 143 formal requests from data protection authorities (previous year: 113). No fines were imposed.</p>	I-II
MSD Content creation and dissemination		
103	<p>Management approach (including GRI 103-1, 103-2, 103-3)</p> <p>The media are an integral and necessary part of our social order – they are simultaneously an economic and a cultural asset. The media report and entertain, clarify, put things in context, and reflect a diversity of opinions. Bertelsmann takes seriously the social responsibility that this implies: for its business and journalistic activities, as well as the production and distribution of content and formats worldwide. In providing outsourcing, print and education services, the company gives top priority to professionalism and customer focus, service quality, and the protection of personal information.</p> <p>The Bertelsmann Essentials define Creativity and Entrepreneurship as important guiding principles in the manufacturing and distribution of media products and services. In addition, the Bertelsmann Code of Conduct specifies key principles for the responsible production and distribution of media and services that are consistent and binding for all Bertelsmann companies. Compliance with legal requirements and the highest quality standards is a matter of course for Bertelsmann and is fundamental to the company's success.</p> <p>Bertelsmann considers the impact of the content it produces and distributes so as to protect the rights and interests of media users, customers and third parties as best as possible. In accordance with the Editor-in-Chief Principle practiced at Bertelsmann, responsibility for the production and dissemination of media content lies solely with the content managers in the companies' editorial teams and creative departments, who are free from influence from the Group's owners or local management. Overriding principles and guidelines of media ethics are set by national and international laws governing the press, broadcasting and multimedia; by voluntary commitments to external guidelines such as the ethics codes of national press councils; and within the company by the Bertelsmann Code of Conduct. It commits Bertelsmann's editorial and creative staff to "respect privacy and the responsible treatment of information, opinion and images" among other things. In some cases, other statutes regulate the handling of content responsibility at the divisional, company and editorial-department level. The representation of social diversity, as well as regulations to avoid discriminating or stereotyping content and online disinformation ("fake news"), also play an important role. Cross-divisional networks, programs and events such as the Bertelsmann Content Alliance promote synergies as well as the exchange on best practices and specific topics of the company's product- and content-related responsibility.</p> <p>A special responsibility in the creation and dissemination of content applies to children and adolescents, who experience the world as "digital natives." The purpose of media policies and laws is to protect minors through the review of media content to determine any possible detrimental effects on the development of children and young adults. If such an effect is suspected, various distribution restrictions apply. The policies and laws are intended to ensure that such media content is only accessible to age groups with the necessary maturity to put the possibly disturbing or unsettling content into context and process it appropriately. Bertelsmann gives high priority to the protection of children and young adults in the production and dissemination of its media content and complies with the relevant</p>	I-II

GRI	Disclosure	UNGC
	<p>requirements. These include broadcast time restrictions as well as content and product labeling. Particularly in broadcasting divisions and companies, efforts are often made to go beyond the existing European and national regulations, (e.g., the Audiovisual Media Services Directive).</p>	
	<p>Actions taken to improve adherence to content creation values and to improve performance in relation to content dissemination issues and results obtained</p>	I-II
	<p>Example: RTL Group</p>	
	<p>In addition to local laws and voluntary commitments, the “RTL Group Newsroom Guidelines” guide the work of its editorial staff. The Guidelines describe editorial Duties of Care, and include regulations on the protection of minors, impartial reporting, the protection of privacy and how to handle the representation of violence. In May 2017, the Newsroom Guidelines were updated in the areas of personal rights and privacy, the careful handling of sources – in particular social media sources – as well as the clear separation of editorial and advertising content. This update is partly a reaction to the issue of online disinformation (“fake news”). To prevent the spread of such disinformation, at the end of 2016, Mediengruppe RTL Deutschland set up an in-house team of experts to verify user-generated content. This verification unit has since been expanded internationally into a Group-wide team of journalists and information specialists. Beyond this, RTL Group has established additional processes to ensure compliance with ethical standards. At Groupe M6, in accordance with the French law on strengthening media freedom, independence and diversity of content, ethical standards are monitored and analyzed by an Ethics Committee. A similar committee has been set up at RTL Luxembourg. In Germany, Mediengruppe RTL Deutschland also appointed a voluntary Media Advisory Council. The panel, with representatives from politics, culture, business and religious organizations, advises Mediengruppe RTL Deutschland’s management with special attention to diversity of opinion and plurality of channels and products.</p>	
	<p>At Mediengruppe RTL Deutschland, the Standards & Practices department advises the editorial teams on matters related to the protection of minors. It ensures compliance with legal requirements and serves as the contact point for viewers and regulatory bodies. Mediengruppe RTL Deutschland’s channels teamed up with other commercial program providers in 1993 to found the Self-Regulation Body of the Television Industry (FSF). The channels’ Youth Protection Officers proactively submit youth protection-relevant programs to the FSF’s independent review groups prior to broadcast. The FSF reviews programs for suitability for minors and makes a binding decision as to whether and at what time a program may be broadcast. RTL Nederland is affiliated with NICAM, a Dutch institute responsible for the development and implementation of the “Kijkwijzer” classification system which warns parents and educators if a TV program or movie has content unsuitable for specific age groups. In France, as early as 1989, the channels of Groupe M6, part of RTL Group, developed a voluntary labeling system for their broadcasted films – a system adopted and made obligatory in 1996 for other French broadcasters by the Conseil Supérieur de l’Audiovisuel.</p>	
MSD	Media literacy	
103	<p>Management approach (including GRI 103-1, 103-2, 103-3)</p>	I-II
	<p>As a key skill of our time, media literacy has major implications for the education and development opportunities of children, adolescents and adults. By promoting relevant education measures, especially in literacy and reading, Bertelsmann makes an important</p>	

GRI**Disclosure****UNGC**

contribution to societal development. The company is guided by the principle of helping people to help themselves at an early stage.

Bertelsmann and its divisions are involved in many ways in initiatives to promote reading and digital literacy – in particular, [reading days, reading initiatives, and book donations](#).

Actions taken to empower audiences through media literacy skills development and results obtained

Media providers at Bertelsmann engage in various initiatives to actively promote media literacy among children and young adults. Online media literacy, or Internet literacy, is a particular focus of their efforts. RTL Group was a founding member of the EU's "CEO Coalition to make the internet a better place for kids" initiative, which develops specific recommendations for handling digital media. These efforts are being continued in the "Alliance to Better Protect Minors Online," founded in 2017, in which Super RTL and Mediengruppe RTL Deutschland participate. Likewise, the EU initiative "klicksafe.de," sponsored by Super RTL, works to promote public awareness of safe Internet use through practical programming and information materials. The German broadcaster also supports – and has for 10 years – the online search engine fragFINN.de, which provides children between the ages of 6 and 12 with a safe, child-friendly website to research topics that interest them. The Penguin Random House publisher Dorling Kindersley offers a similar platform with "DKfindout!" Children, and young people are increasingly using Bertelsmann's services online on smartphones, tablets and PCs – which is why it is so important to keep developing technical solutions to protect minors, for every platform.

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