



Code

of  
Conduct

- > Decision-Making Guide
- > Whom Should You Consult for Help?
- > Code of Conduct in Brief

[www.ethics.bertelsmann.com](http://www.ethics.bertelsmann.com)

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## Decision-Making Guide

In our daily work we are often faced with situations in which we must decide whether a certain decision or action is appropriate.

**Considering the following questions can help in making good decisions:**

- > Is my action or decision consistent with the law and with company policies?
- > Am I capable of making an impartial decision that is in the best interest of the company, free from any competing personal interest?
- > Would my action or decision be viewed as acceptable if scrutinized by others?
- > Will my action or decision protect our company's reputation as a law-abiding and responsible corporate citizen?

If you can confidently answer yes to each of these questions, it is likely that your action or decision is appropriate. If you cannot confidently answer yes to all of these questions, then don't take action or make a decision without first seeking professional advice. The next section describes whom you can contact to seek qualified advice.

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## Whom Should You Consult for Help?

Bertelsmann puts different resources at your disposal to address any concerns you might have. Please choose the resources that seem most appropriate.

### 1. In your immediate working environment

A list of people to contact within specific Bertelsmann subsidiaries can be found online at [www.ethics.bertelsmann.com](http://www.ethics.bertelsmann.com).

### 2. Ombudsperson

Bertelsmann has appointed third-party ombudspersons to give employees a secure point of contact for providing information about observed misconduct.

[ombuds@discussconcerns.com](mailto:ombuds@discussconcerns.com)

Toll-free phone numbers:

Callers from Australia: 1800-12 50 84

Callers from Canada: 877-604 92 03

Callers from Ireland: 1800-81 28 60

Callers from the UK: 0800-783 15 06

Callers from the US: 877-278 03 03

To find toll-free numbers for additional countries, please refer to the last pages of this document or go to [www.ethics.bertelsmann.com](http://www.ethics.bertelsmann.com).

### 3. Internet-based whistle-blower system

Employees' reports will be treated confidentially. This system is managed by a third-party vendor, not a Bertelsmann-owned company.

[www.reportconcerns.com](http://www.reportconcerns.com)

#### **4. The Bertelsmann Corporate Center**

##### **Ethics & Compliance Department**

Germany:

Phone +49(0) 52 41-80-421 01

Fax +49(0) 52 41-80-66 10

USA:

Phone +1 212 782-1057

Fax +1 212 782-1059

[ethics@bertelsmann.com](mailto:ethics@bertelsmann.com)

[www.ethics.bertelsmann.com](http://www.ethics.bertelsmann.com)

##### **Human Resources**

Phone +49(0) 52 41-80-22 64

Fax +49(0) 52 41-80-66 10

##### **Audit**

Phone +49(0) 52 41-80-722 39

Fax +49(0) 52 41-80-12 06

##### **Legal**

Phone +49(0) 52 41-80-24 85

Fax +49(0) 52 41-80-667 00

##### **Legal – Antitrust**

Phone +49(0) 52 41-80-21 92

Fax +49(0) 52 41-80-667 00

#### **>> The address for these departments is:**

Bertelsmann AG

Carl-Bertelsmann-Straße 270

33311 Gütersloh

Germany

Phone +49(0) 52 41-80-0

Fax +49(0) 52 41-80-96 62

[www.bertelsmann.com](http://www.bertelsmann.com)

# Code of Conduct in Brief



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## Corporate Responsibility

# 1

### > **Compliance with the law**

We comply with all applicable local, national and international laws and regulations wherever we do business.

### > **Human rights**

The respect for and protection of human rights is part of our corporate culture.

### > **Environment, health & safety**

Environmental protection, health and safety are integral parts of our corporate responsibility.

### > **Product safety**

We create and develop safe products and services for our customers.

### > **Governmental & regulatory relations**

We conduct proper and legally impeccable relations with all government regulators and agencies.

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## Interpersonal Conduct in the Workplace

# 2

### > Mutual trust & respect

We treat each other in a mutually respectful and trusting manner at work and seek to create a workplace environment that does not allow for discrimination, harassment, bullying or intimidation.

### > Freedom to speak without fear of retaliation

We encourage our employees to speak up freely and without fear of retaliation. We do not retaliate against employees who raise good-faith workplace concerns.

### > Data privacy & protection

We collect, retain, use and transmit personal data and information in compliance with applicable law and policy.

### > Responsible use of assets

We deal with company property, products and resources responsibly and appropriately and use them only for their intended business purposes.

### > Conflicts of interest

We disclose potential or actual conflicts of interest in the workplace in a timely manner for proper review and resolution.

# 3

**> Financial integrity & antifraud**

We conduct our business and manage recordkeeping and reporting with integrity and transparency.

**> Anticorruption & antibribery**

We do not engage in corruption, bribery, kickbacks or other illegal transactions with private, commercial or governmental parties.

**> Gifts & entertainment**

When giving or receiving business gifts or entertainment, we do so in a transparent manner that complies with company policy, industry standards and applicable law.

**> Antitrust compliance**

We comply with applicable antitrust and competition laws and consult expert company counsel on antitrust and competition issues.

**> Insider trading**

We comply with applicable insider trading laws and company policy regarding material nonpublic information that we learn about our own or other businesses.

# 4

**> Intellectual property protection**

We respect and protect all forms of intellectual property and protected content regardless of whether they are created by our companies or by third parties.

**> Information technology use & security**

We make proper business use of workplace information technology and help to protect systems and equipment against internal and external threats.

**> Confidentiality & public relations**

We protect company, product, service and other confidential business information from unauthorized disclosure and use.

**> Honest statements regarding products and services**

We do not knowingly engage in or promote misrepresentation or fraud in the marketing or advertising of our products and services.

**> Media independence & responsibilities**

We observe editorial and journalistic independence in news gathering and distribution.

## **Toll-free phone numbers to reach Bertelsmann ombudspersons:**

**Argentina**  
0800-666 1083

**Australia**  
1800-125084

**Austria**  
0800-295622

**Belgium**  
0800-80765

**Brazil**  
0800-891-0198

**Canada**  
877-604-9203

**Chile**  
800-55 1900

**China (Telecom)**  
10800-440-0336

**China (Netcom)**  
10800-744-0355

**Colombia**  
01800-518-1048

**Croatia**  
0800-22 2448

**Cyprus**  
800-92441

**Czech Rep.**  
800-700558

**Denmark**  
80-600096

**Estonia**  
800-004-4356

**Finland**  
0800-919670

**France**  
0805-540186

**Germany**  
0800-664-7879

**Greece**  
00800-44 14-5906

**Hong Kong**  
800-930367

**Hungary**  
06-8098-3443

**India**  
00800-440-1670

**Indonesia**  
0180-344-1638

**Ireland**  
1800-81 2860

**Italy**  
800-924608

**Japan**  
0120-929820

**Luxembourg**  
800-23167

**Malaysia**  
1800-880750

**Mexico**  
001-888-311-5054

**Morocco\***  
00-211-00 11;  
877-566-2837

**Netherlands**  
0800-020-2008

**New Zealand**  
0800-688932

**Norway**  
800-30-118

**Philippines**  
1800-1441-0390

**Poland**  
00800-442-11 21

**Portugal**  
800-8447 13

**Russia**  
810-800-2296-1044

**Singapore**  
800-448-1603

**Slovakia**  
0800-004687

**Slovenia**  
0800-80374

**South Africa**  
0800-981849

**South Korea**  
080-911-0880

**Spain**  
900-81 24 35

**Sweden**  
020-160-5682

**Switzerland**  
0800-562108

**Taiwan**  
0800-666323

**Thailand**  
001800-441-5516

**Turkey**  
888-311-5064

**United Kingdom**  
0800-783-1506

**Uruguay**  
000-411-002-3356

**USA**  
877-278-0303

**Venezuela**  
0800-100-8834

A list of toll-free phone numbers  
is also available online at  
[www.ethics.bertelsmann.com](http://www.ethics.bertelsmann.com).

\* Please dial the first phone  
number and wait to be prompted.  
Then dial the second phone  
number.



## Mixed Sources

Product group from well-managed forests and other controlled sources

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Cert no. SG8-CoC-3340

[www.fsc.org](http://www.fsc.org)

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### Germany:

Bertelsmann AG | Ethics & Compliance

Carl-Bertelsmann-Straße 270 | 33311 Gütersloh

Phone: +49 (0) 52 41-80-421 01 | Fax: +49 (0) 52 41-80-66 10

[ethik@bertelsmann.de](mailto:ethik@bertelsmann.de) | [www.ethik.bertelsmann.de](http://www.ethik.bertelsmann.de)

### USA:

Bertelsmann, Inc. | Ethics & Compliance

1745 Broadway | New York, NY 10019

Phone: +1 212 782-1057 | Fax: +1 212 782-1059

[ethics@bertelsmann.com](mailto:ethics@bertelsmann.com) | [www.ethics.bertelsmann.com](http://www.ethics.bertelsmann.com)

The complete Bertelsmann Code of Conduct and further information is available online at

[www.ethics.bertelsmann.com](http://www.ethics.bertelsmann.com)