



ProSiebenSat.1  
Media SE



NACHHALTIGKEITSPAKT  
MEDIEN

# NACHHALTIG- KEITSPAKT Medien

Answers of ProSiebenSat.1 Media SE  
to the main questions of the  
[Sustainability Pact for the Media](#)

Status as of May 2024

## **ABOUT THE SUSTAINABILITY PACT FOR THE MEDIA**

As a founding member of the “Nachhaltigkeitspakt Medien” (Sustainability Pact for the Media), which was publicly presented as “Nachhaltigkeitspakt Medien Bayern” (Sustainability Pact for the Media in Bavaria) at the Munich Media Days in October 2022, we want to provide an impulse for the responsible shaping of a more sustainable media industry. Coordinated by the Bavarian Regulatory Authority for New Media (BLM), together with other founding members such as Vodafone, Amazon Prime Video, Bayerischer Rundfunk, egoFM, science representatives and the Bavarian Journalists' Association, we have developed an approach that, in addition to the three pillars of economy, ecology and social issues, also defines journalistic responsibility as an essential component of sustainability in media companies for the first time. Based on these four pillars, guidelines and questionnaires are intended to offer small and medium-sized media companies in particular the opportunity to develop a sustainability strategy with an appropriate amount of time and personnel and to anchor sustainability and public value in the company.

Since May 2024, the Sustainability Pact for the Media has also been open to companies based outside Bavaria and aims to further develop its industry-specific understanding of sustainability with stakeholders from the entire German media landscape. In addition, the guidelines were fundamentally evaluated and expanded to include the topic of artificial intelligence.

Further information on the Sustainability Pact Media can be found here:

[BLM - Homepage](#)

As a founding member, the ProSiebenSat.1 Group has committed itself to answering and publishing the main questions of the Sustainability Pact.



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## 1. ECONOMIC / CORPORATE RESPONSIBILITY QUESTIONNAIRE

### 1.1 What governance or corporate management goals does the company set for itself? How does it intend to achieve them?

ProSiebenSat.1 is the home of popular entertainment and infotainment and an independent leading entertainment and commerce provider in the German-speaking region. We will sustainably strengthen this position by focusing on **three strategic priorities**: We are investing more in programming content, maximizing our reach, and diversifying our monetization.

In addition, we are expanding our offerings around our core business of entertainment with modern digital services and products in the Commerce & Ventures and Dating & Video segments, thus diversifying ProSiebenSat.1 Group's revenue profile. ProSiebenSat.1 Group's goal is to grow profitably across the Group and create value for all stakeholders, including viewers, users, advertisers, shareholders, and employees. At the same time, we are also aware of our social responsibility and are consistently developing our Group's sustainability performance.

Our **sustainability strategy** is based on the UN Sustainable Development Goals (SDGs). They define global priorities and targets for sustainable development by 2030 and aim to mobilize global efforts to achieve a common set of goals and targets.

ProSiebenSat.1 Group also wants to contribute to this transformation. As part of its strategy development, the Group has identified the following six goals as particularly relevant for its business activities and their contribution to the SDGs: Quality Education (SDG 4), Gender Equality (SDG 5), Reduced Inequalities (SDG 10), Climate Action (SDG 13), Peace, Justice and Strong Institutions (SDG 16) and Partnerships for the Goals (SDG 17).

Based on this, we have divided our sustainability management into **four areas of action** in which we bundle our activities thematically: Public Value & Corporate Citizenship, Diversity & Inclusion, Climate & Environment and Governance & Compliance.

- **Public Value & Corporate Citizenship - We campaign for socially relevant issues:**

With our entertainment and commerce offerings, we appeal to millions of viewers, users, and customers across all platforms every day. We are aware of the high level of attention our products receive and recognize this as a special obligation for us: With our offerings and especially our content, we assume a special social responsibility and contribute to shaping public opinion (public value). At the same time, we are committed to our society and using our media reach for social purposes (corporate citizenship).

- **Diversity & Inclusion - We promote equal rights and equal opportunities:**

For us, diversity and inclusion mean recognizing and valuing difference and individuality. Our aim is to create a working environment that is free of prejudice and shows the same high regard for all employees - regardless of age, disability, ethnic origin and nationality, gender and gender identity, religion and ideology, sexual orientation, and identity.

- **Climate & Environment - We are committed to ecological sustainability and climate protection:**

ProSiebenSat.1 Group is aware of its ecological responsibility. That is why we want to make our contribution to mitigating climate change and preserving our environment together with our employees and in dialog with our external



stakeholders. We have set ourselves the central, Group-wide goal of achieving operational greenhouse gas neutrality by 2030. We have been continuously reducing our operational emissions since the target was set in 2019. In 2023, we were able to reduce these by 13% compared to the previous year.

- **Governance & compliance - We stand for openness and honesty:**

The Management Board and Supervisory Board consider good corporate governance to be an essential component of responsible, transparent corporate management geared towards long-term value creation. The German Corporate Governance Code (GCGC) has established a standard for the transparent control and management of companies.

The successive implementation of ProSiebenSat.1 Group's sustainability strategy is tracked by **annual ESG targets** at Group level in the short-term incentive. This enables relevant and simultaneously quantifiable ESG targets to be taken into account in line with the annual targets for the implementation of the sustainability strategy. As part of budget approval, the Supervisory Board therefore sets binding, specific, and measurable targets from a defined list of criteria before the start of the respective financial year. The list of criteria includes environmental and social targets derived from the areas of action of the sustainability strategy.

In 2024, the ESG target of reducing operating CO<sub>2</sub>e emissions, which has been in place since 2021 as a subcomponent of the short-term incentive, will be supplemented by an additional ESG target to expand the broadcasting group's accessible offerings. As a result, the priorities of ProSiebenSat.1 Group's sustainability strategy will be more extensively integrated into the Executive Board's targets in the future: In addition to the action area "Climate & Environment", the new ESG target will reflect the action areas "Public Value & Corporate Citizenship" and "Diversity & Inclusion". The new target will support the further expansion of accessible program content - for example by expanding subtitled programs and offerings with audio description and in sign language - to make ProSiebenSat.1 Group's content accessible to as many viewers as possible.

The ESG targets are included in ProSiebenSat.1 Group's short-term incentive with a total weighting of 20%, with the targets of reducing operational CO<sub>2</sub>e emissions and expanding accessible offerings each being weighted at 10%.

Further information on the short and medium-term targets (revenue growth, P7S1 return on capital employed, leverage ratio, dividend policy, sustainability) can be found online in the Annual Report: [ProSiebenSat.1 Media SE – Annual Report \(prosiebensat1.com\)](https://www.prosiebensat1.com/annual-report)

Good corporate governance is a key component of responsible, transparent corporate management and control geared towards long-term value creation. It promotes the trust of investors, the financial markets, customers and business partners, employees, and the public in the ProSiebenSat.1 Group. Our guiding principle is the German Corporate Governance Code (GCGC) introduced in 2002 in its current version. Many of the principles of corporate governance contained in the GCGC have been practiced at ProSiebenSat.1 for a long time.

The current declaration of compliance with the GCGC can be found online at: [ProSiebenSat.1 Media SE – Management Declaration \(prosiebensat1.com\)](https://www.prosiebensat1.com/management-declaration)



## **1.2 How is it ensured within the company that all current as well as planned, relevant legal foundations are known, and that implementation is continuously monitored?**

The Executive Board of ProSiebenSat.1 Media SE is convinced that sustainable economic success in a competitive environment can only be achieved by ensuring that business practices comply with the applicable laws. In addition to preventing corruption, the Group Compliance department at ProSiebenSat.1 Group concentrates in particular on the issues of money laundering prevention, sanctions and embargoes, as well as data protection. ProSiebenSat.1 Group has implemented a **compliance management system (CMS)** for these legal areas. The main objective of the CMS is to ensure that all employees consistently think and act with integrity and in accordance with company policies and the law in order to avoid and help prevent violations of laws and regulations.

The Executive Board also sees the effective monitoring of compliance with sustainability standards as a significant aim. This applies to both regulatory and internal standards. In this regard, the Executive Board systematically assesses and identifies the opportunities and risks for the Company associated with social and environmental factors as well as the social and ecological impacts of the Company's operations. ProSiebenSat.1 Group's strategy resulting on the basis of this evaluation therefore also covers social and ecological targets to the due extent. It is also important to the Executive Board to account for the relevant issues besides financial aspects in the corporate planning.

In view of its Group structure, ProSiebenSat.1 Group has established both **a central and a decentralized compliance organization**.

The central organization is made up of the Compliance Committee and the Group Compliance department, which are assisted in the performance of their duties by experts from other areas, such as the Legal department. The Compliance Committee is made up of the Executive Board member responsible for compliance, the Senior Vice President Internal Audit and the head of the Group Compliance department, as well as the Group function Legal, the Unit Compliance Officers (UCO) of the different segments and the Group Data Protection Officer. The Compliance Committee and Group Compliance support and advise the Executive Board with the implementation, monitoring and development of the CMS. The Group Compliance department was part of the Executive Board department covering HR, Compliance & Sustainability until July 2023, and it now reports to the Group CFO. It is entrusted with implementing the CMS in the Group, carries out risk analyses and training, and advises the Executive Board on the development and implementation of appropriate measures to minimize risk. In addition, the Group Compliance department monitors legal developments and makes proposals for updating the CMS. Since January 2024, the Group Compliance department has been part of the newly created Governance, Risk & Compliance unit, which combines the three functions Compliance, Risk Management, and Internal Control System.

The decentralized compliance organization is represented by UCO, who are appointed in Group entities and in the individual business areas across the Group.

Overall responsibility for the CMS lies with the Executive Board of ProSiebenSat.1 Media SE as the parent company of ProSiebenSat.1 Group.

ProSiebenSat.1 Group has laid down basic guidelines and policies in the **Code of Conduct**. These guidelines define the general standards for conduct in business, legal and ethical matters and also govern how employees can report misconduct in the Company, including via our **whistleblower system**. They serve all members of the Executive Board, the management of subsidiaries of ProSiebenSat.1 Group, and the employees of ProSiebenSat.1 Group as a binding reference and regulatory framework for dealing with each other and with business partners, customers, suppliers, and other third parties.





The Code of Conduct can be downloaded here:

[ProSiebenSat.1 Media SE – Compliance Documents \(prosiebensat1.com\)](https://www.prosiebensat1.com/en/investor-relations/corporate-governance/compliance)

Further information on compliance, the whistleblower system, etc. can be found here:

<https://www.prosiebensat1.com/en/investor-relations/corporate-governance/compliance>

Further information on compliance and compliance training can be found in the 2023 Annual Report on p. 28f and p. 75f, information on data protection on p. 78f and information on ensuring compliance with media law and youth protection regulations on p. 80f:

<https://www.prosiebensat1.com/en/investor-relations/publications/annual-report>

### 1.3 What strategy does the company pursue regarding the supply chain?

The principles of the ProSiebenSat.1 Group's **Code of Conduct** are also made **binding for our business partners** via a separate Code of Conduct, which transparently formulates our expectations of ethical behavior and forms the basis for our business relationships. The exercise of corporate, social and ecological responsibility in accordance with the requirements set out in this Code of Conduct is taken into account when selecting suppliers. The Code of Conduct for Business Partners is published here:

<https://www.prosiebensat1.com/en/investor-relations/corporate-governance/compliance-documents>

Another central compliance instrument for ProSiebenSat.1 Group is the **whistleblower system**. In addition to internal reporting channels, since December 2022 it has also been possible to report legal violations anonymously via an electronic whistleblower system. This also covers the **complaints procedure under the German Supply Chain Due Diligence Act** (German “Lieferkettensorgfaltspflichtengesetz – LkSG”) and thus meets the requirements of the German Whistleblower Protection Act. For all reports, regardless of the chosen reporting channel, Group Compliance promptly informs the management about reports of serious suspicions that following preliminary internal evaluation prove to be potentially justified or have particularly high potential for damage.

ProSiebenSat.1 Media SE falls under the scope of the LkSG with effect from January 1, 2023. It obliges ProSiebenSat.1 Group companies to implement specific, appropriate measures to safeguard against human rights and environmental risks in their own business operations and with regard to their direct and indirect suppliers. To obtain a comprehensive and continuously updated overview of any risks in our supply chain, ProSiebenSat.1 conducts both annual and ad hoc risk analyses. In 2023, ProSiebenSat.1 Media SE issued a policy statement about its human rights and environmental strategy and reported on this as part of its reporting obligations under Section 10 LkSG. These documents are publicly accessible:

<https://www.prosiebensat1.com/en/sustainability/action-areas/human-rights>

### 1.4 What is the company's strategy regarding corporate finance?

ProSiebenSat.1 Media SE is a listed stock corporation.

Group-wide financial management is performed centrally by the Treasury department of the holding company. The core aims of financial management include:

- to secure financial flexibility and stability, i.e. to maintain and optimize the Group's funding ability,





- to ensure that the entire Group remains solvent by managing its liquidity efficiently across the organization,
- to manage financial risks by using derivative financial instruments.

The Group's financial management covers the capital structure management and Group-wide funding, cash and liquidity management, and the management of market price risks, counterparty risks and credit default risks.

The ProSiebenSat.1 Group has various financing instruments at its disposal and pursues an active financial management policy. The long-term financing instruments include promissory notes and unsecured syndicated loan agreements.

### 1.5 How are new customers acquired and how are regular customers served?

We are increasing our reach by providing **local and relevant live content** on our wide range of entertainment platforms and investing in attractive content. At the center of our entertainment strategy is our **streaming platform Joyn**, with which we serve different media usage interests. On Joyn, users can choose from a broad content portfolio - with around 70 linear TV stations, 32,000 hours of on-demand content, and exclusive movies and shows. With this strategic focus, we are opening up additional monetization opportunities. At the same time, we are expanding our offerings around our core business of entertainment with modern digital services and products in the Commerce & Ventures and Dating & Video segments, thus diversifying ProSiebenSat.1 Group's revenue profile.

Due to this diversity in our portfolio, we have everything we need to reach millions of people every day. In Germany alone, we reached more than 60 million people in 2023. Our guiding principle is "Viewers and Users First." This means we put viewers and users at the center of everything we do and gear our offerings entirely to their needs. They can thus be entertained by our content, make use of our products, and ultimately spend as much time with us as possible.

In addition to a broad range of media offerings, partnerships are an important way of expanding our reach, particularly in the digital environment. One example of this is the distribution partnership with Vodafone Germany, which the Group extended in 2023: In addition to the linear availability of all ProSiebenSat.1 stations, the new distribution agreement centers on increased cooperation on digital product offerings, particularly in the area of video-on-demand.

ProSiebenSat.1 is driving forward the digital transformation by offering content via as many distribution channels as possible and thus serving different user interests. Our streaming platform Joyn is at the center of this strategy: We are connecting Joyn with all our channels and want to strengthen our reach in this way. Joyn offers all live TV services of the ProSiebenSat.1 station family, a comprehensive media library as well as exclusive previews and catch-ups of our formats on demand. The Group also primarily relies on an ad-financed offering in the area of streaming, which is therefore freely available to users. This sets the Group apart from the competition, as global streaming platforms in particular are currently refinanced primarily through subscriptions.

By focusing on local content, we are creating an important competitive advantage: with a large amount of exclusive content, we are differentiating ourselves more clearly from multinational streaming providers and at the same time sharpening our brand profile in linear TV. In 2024, the Group will further reduce the proportion of US licensed content in favor of local formats. In 2024, we will **increase program expenditure for local program content** by around EUR 80 million. Overall, ProSiebenSat.1 Group will thus make program



investments of around EUR **1.05 billion** this year. US licensed content will remain important in the future, but the Group will acquire it on a selective basis.



## 2. ENVIRONMENTAL QUESTIONNAIRE

### 2.1 What are the company's climate/environmental goals? How does it intend to achieve them?

Even though ProSiebenSat.1 Group as a digital company does not operate in an industrial sector with high resource consumption and high energy intensity, we are aware of our ecological responsibility.

Together with our employees and in dialog with our external stakeholders, we therefore want to make our contribution in limiting climate change and protecting the environment and its resources. We have set ourselves the central, Group-wide goal of achieving **operational carbon neutrality by 2030**. To this end, we have continually reduced our operational emissions since the target was set in 2019 (base year). In 2023, we can report a reduction of 13% year-on-year.

We want to achieve this goal primarily by reducing energy consumption and sourcing electricity from renewable sources. We have also identified CO<sub>2</sub>e savings potential in areas such as **"Green Productions"** and employee mobility.

Furthermore, as in previous years, ProSiebenSat.1 Group plans to offset ten percent of the total emissions (Scope 1, Scope 2, Scope 3) by purchasing certificates from climate protection projects selected according to defined criteria.

As ProSiebenSat.1's decarbonization strategy aims for a high level of ambition and intends to make a science-based contribution to the global 1.5 degree target, we are currently working on a climate target in accordance with the requirements of the **Science Based Targets initiative**.

More information on this can be found in the Annual Report 2023, p. 64ff.: <https://www.prosiebensat1.com/en/investor-relations/publications/annual-report>

### 2.2 How are current actions analyzed in terms of environmental sustainability (status quo analysis)? How is performance measured and monitored?

The ProSiebenSat.1 Group publishes the most important ecological key figures and targets as part of the annual sustainability report. This is audited by the auditors. In addition, the company participates in the Carbon Disclosure Project (CDP) and other initiatives. The CDP audits and evaluates energy sustainability, particularly with regard to greenhouse gas emissions. Furthermore, the ProSiebenSat.1 Group and its actions for environmental sustainability are also measured in other ratings.

You can find a selection of **current sustainability ratings** here:

<https://www.prosiebensat1.com/en/sustainability/our-responsibility/materiality-analysis-and-stakeholder-dialogue>

### 2.3 What criteria are applied to the equipment at the workplace or the work equipment of employees?

Electricity consumption and other criteria are taken into account when purchasing work equipment, IT equipment, studio equipment and infrastructure. This is complemented by the fact that ProSiebenSat.1's major sites (Unterföhring and many others) have switched completely to green electricity. As part of our central, Group-wide goal of achieving



operational carbon neutrality by 2030, we will gradually increase the proportion of sites with electricity from renewable energies.

ProSiebenSat.1 also uses active **supplier management** to ensure compliance with ethical and ecological principles in the procurement of products and services. These requirements are set out in the Code of Conduct for Business Partners. We use a structured Group-wide supplier management system for the objective evaluation, management and development of supplier relationships.

Further information can be found here: [ProSiebenSat.1 Media SE – Purchasing \(prosiebensat1.com\)](https://prosiebensat1.com)

## **2.4 How are possible negative environmental impacts of operational manufacturing and production processes considered and managed?**

At the Unterföhring site - the Group's headquarters - we supply our office buildings, production studios, and data centers exclusively with **green electricity**. As an energy source for space heating, ProSiebenSat.1 prefers to use district heating from renewable sources, such as geothermal energy at its headquarters. We also use the waste heat from our own data centers as heating energy. The ongoing conversion to LED lighting in the offices and production studios is also contributing to increase energy efficiency. In addition, sustainability certification in accordance with the LEED model (Leadership in Energy and Environmental Design) is planned as part of the new construction project on the campus in Unterföhring. In 2023, ProSiebenSat.1 PULS 4 became the first Austrian TV station group to be certified according to the European environmental management system **EMAS (Eco-Management and Audit Scheme)**.

With the "**Clean Shoot!**" initiative, Seven.One Entertainment Group GmbH ("SevenOne Entertainment Group") developed an extensive package of measures in 2019 to make film and TV productions more sustainable: The initiative defines requirements and recommendations for action for production companies to reduce CO<sub>2</sub>e emissions and conserve resources. The package of measures was also applied in full during the financial year 2023. As a member of the Green Shooting working group, ProSiebenSat.1 works with numerous representatives of the film and television industry and film funding institutions to continuously develop the industry-wide ecological standards for audiovisual production adopted in October 2021. Since 2023, compliance with these standards is also a mandatory requirement for receiving funding for the production of films and series.

The Group is undergoing a gradual transformation to switch completely to **locally emission-free e-mobility**. All pool vehicles available at the headquarters in Unterföhring were replaced with fully electric models in 2023. In addition, since May 2023, only electric vehicles can be ordered as company cars. There are over 100 charging stations on the campus in Unterföhring (as at Q1 2024). The charging points are powered exclusively by green electricity.

## **2.5 What strategies and measures are used to promote sustainable consumption of the company's own products and services?**

An important part of ProSiebenSat.1's business practices is the sustainable use of resources, which runs through all areas of the company. One focus here is also on the perspective of the users. We are therefore monitoring the CO<sub>2</sub>e emissions of streaming and evaluating various approaches that should lead to a more reflective approach to streaming services.



We also offer our advertising customers various options to stand out in the area of sustainability, for example through co-branding campaigns, accessible commercials or collaborations. In addition, all TV commercials and some digital campaigns have the option of carbon offsetting and compensation.

Further options and information can be found here:

<https://www.seven.one/werbeprodukte/sustainability>



### 3. SOCIAL QUESTIONNAIRE

#### 3.1 What socially sustainable goals has the company set for itself? How does it intend to achieve them?

Based on the UN Sustainable Development Goals (SDGs), ProSiebenSat.1 has developed a sustainability strategy with four areas of action as the focus of its sustainability activities (see explanations under question 1.1).

Two areas of action (also) focus on social sustainability: Public Value & Corporate Citizenship and Diversity & Inclusion.

By **corporate citizenship**, we mean our responsibility as a company and part of society to do good. We use the wide reach of our stations and platforms to strengthen our social commitment. ProSiebenSat.1 provides charitable organizations with discounted or pro bono gross media volumes each year, up to a single-digit million euro amount in individual cases, to draw attention to social issues or generate donations. When selecting partner organizations, criteria such as a high level of credibility and an ability to deliver politically neutral aid effectively are very important for us.

In addition to our commitment to emergency and disaster relief, we also provide media volumes in support of other charitable organizations that make a positive contribution to our society. As a founding member, the ProSiebenSat.1 Group has been supporting the startsocial association, among others, since 2001. In addition to funding in the form of media volume, employees support the initiative on a voluntary basis as coaches, jury members and on the advisory board. startsocial promotes voluntary social commitment throughout Germany by, among other things, helping social initiatives tackle their challenges and goals together during a four-month consultation phase with two coaches from the business world. With the German Federal Chancellor as its patron, startsocial also presents awards and allocates advisory grants to outstanding voluntary initiatives.

Our employees are committed to climate and environmental protection as well as social projects in various charitable, local initiatives or in-house volunteer projects. The GreenTeam, which was founded by employees in 2018, focuses on developing and implementing specific sustainable solutions to reduce ProSiebenSat.1's ecological footprint and motivate employees to take more personal responsibility.

In addition, the Group and its employees regularly organize fundraising campaigns for charitable organizations, such as the annual support for the Christmas campaign run by the children's foundation "Die Arche" in Munich. In the Entertainment segment, projects and fundraising campaigns are often implemented in conjunction with productions. For example, "The Taste" has a long-standing partnership with the Munich-based food bank "Münchner Tafel". For ten years, unused food from the production has been donated to "Münchner Tafel" through this initiative. In 2023, star chefs Alexander Herrmann, Tim Raue and Nelson Müller from "The Taste" also cooked meals in the canteen in Unterföhring for people in need at "Münchner Tafel" and then distributed them personally. The Commerce & Ventures and Dating & Video segments also regularly organized fundraising campaigns and social projects, such as a social day at the ParshipMeet Group's headquarters in Hamburg for the charitable educational initiative KinderHelden GmbH.

Further details on the objectives and measures can be found in the Corporate Citizenship section of the Sustainability Report (Annual Report 2023, p. 58.):

<https://www.prosiebensat1.com/en/investor-relations/publications/annual-report>

The "Diversity Principles" published Group-wide illustrate our commitment to **diversity and inclusion**. They form the basis for our actions, with which we want to promote



tolerance and diversity - in our company and in society. We see this as the responsibility of all our employees and managers. We also pursue this goal in our media offerings, for example by continuously expanding barrier-free access to our content. Further information on our objectives and measures in the area of diversity and inclusion can be found under question 3.5.

In 2024, the relevance of socially sustainable goals will also be emphasized even more strongly by anchoring an ESG goal on accessibility at Executive Board level (see question 1.1).

ProSiebenSat.1 is a signatory to the United Nations **(UN) Global Compact**, a major global initiative for sustainable and responsible corporate governance - and is thus expressly committed to its ten principles in the areas of human rights, labor standards, the environment and climate, and the prevention of corruption. These principles can be found in a corresponding form in the ProSiebenSat.1 Code of Conduct (see question 1.2 above).

### **3.2 How is current action analyzed in terms of social sustainability (status quo analysis)? How is performance measured and monitored?**

ProSiebenSat.1 Group publishes the most important social indicators and targets as part of the annual sustainability report. This is audited by the auditors.

Detailed information can be found in the Annual Report 2023, in the sections Sustainability - Employees (p. 48ff.) and Diversity & Inclusion (p. 59ff.):

<https://www.prosiebensat1.com/en/investor-relations/publications/annual-report>

### **3.3 How are the well-being and further development of employees supported?**

In view of the dynamic market environment, it is crucial to strengthen both the specialist knowledge and the overarching skills of our employees. The **continuous training and development of our employees** is therefore a key success factor for ProSiebenSat.1 Group. At the same time, offering qualified and committed employees development opportunities and retaining them in the Group is crucial to our attractiveness as an employer and a strong performance culture.

ProSiebenSat.1 Group therefore offers a comprehensive range of professional and personal development opportunities. Our internal P7S1 Academy plays a vital role in training and development for our employees. Its training offers for employees in German-speaking countries are available in digital format. Its offerings are closely aligned with the Group's strategic corporate goals and the needs of the individual operating segments. In addition, our employees can use many training offers on the "LinkedIn Learning" platform

We also consider the **regular dialogue between employees and managers** to be essential for the targeted and continuous development of our employees. In 2023, we once again conducted and further developed "Up2Me", our standardized dialogue format relating to individual performance, targets and development potential for the employees of the Group entities, particularly in Unterföhring. With the "Feedback & Feedforward" training course, we want to support our employees and managers in successfully engaging in dialogue and strengthening the feedback culture. In addition, we use an internal job portal to show our talents development opportunities within ProSiebenSat.1 Group and thus strengthen internal mobility within the Group.

Our fundamental aim is to provide our employees with an **attractive working environment** and to retain them within the company in the long term. In addition to market-oriented remuneration, we therefore offer our employees the "MyShares" share





program, which allows employees in Germany to participate financially in the company's development. We also offer numerous social and fringe benefits, healthy meals in the campus canteens and sports programs. Our cooperation with Urban Sports GmbH ("Urban Sports Club") offers our employees in Germany the opportunity to use the sports, fitness and wellness offering at a reduced price. Family-oriented services and our in-house daycare center in Unterföhring complete the offer. ProSiebenSat.1 Group also cooperates with an external service provider that arranges childcare, provides coaching for those in difficult circumstances and offers support with caring for relatives

To ensure that we can also provide a modern working environment for our employees, we have largely implemented **hybrid working models** tailored to the respective work requirements and culture of the individual corporate units. In addition, our employees in Germany have the option of working remotely from 25 EU countries and Switzerland for 30 working days within a rolling twelve-month period. Flexible working time models and part-time work are further ways of promoting a good work-life balance.

In the context of employee retention, it is also important for us to establish a **work culture that supports the health of our workforce**. With our "P7S1 Mental Health Days", for example, we want to raise awareness of the topic of mental health and remove the stigma associated with it. In 2023, the Mental Health Days once again took place in both spring and fall. Employees in German-speaking countries had the opportunity to attend presentations, workshops and training sessions on topics such as resilience, self-care or stress management

With our **corporate values** "Passion", "Innovation", "Courage", "Goal Orientation" and "Responsibility", we aim to strengthen the corporate culture and employees' identification with the company and establish a common basis for our decisions and actions. Various formats and specially appointed value ambassadors support our employees in integrating the values into their day-to-day work and fostering dialogue about our culture.

### **3.4 How does the organization ensure that all employees receive fair compensation?**

For their performance, our employees receive remuneration that is in line with market standards and at least meets the applicable statutory minimum standards, as well as additional company benefits at many locations (see question 3.3 above).

See also Code of Conduct: <https://www.prosiebensat1.com/en/investor-relations/corporate-governance/compliance-documents>

### **3.5 What role does diversity play in hiring, dealing with employees, and with regard to our own target group?**

For us, diversity means recognizing and valuing difference and individuality. Our aim is to create a working environment that is free of prejudice and shows all employees the same high level of appreciation - regardless of their age, disability, ethnic origin and nationality, sex and gender identity, religion and ideology as well as sexual orientation and identity. We regard the differences and diversity of our employees as an important requirement for our Company's success. With this in mind, ProSiebenSat.1 Group signed the **Diversity Charter** as early as 2014 and follows the guidelines specified in it. Our internal guidelines also stipulate that employees at all hierarchy levels should be hired exclusively according to objective criteria and promoted solely on the basis of their abilities. We pursue the goal of promoting diversity within our workforce and champion equal rights and equal opportunities in accordance with the guiding principle for the action area of diversity.



We wish to illustrate our commitment to diversity and inclusion with the “**Diversity Principles**,” which have been published throughout the Group. They form the foundation for our activities to promote tolerance and diversity - in our company and in society. We see this as the responsibility of all our employees and managers.

The diversity of our Company is aided by the best possible balance of men and women and a diversity of genders in the workforce and in management positions. Therefore, we integrated “gender equality” into ProSiebenSat.1 Group’s sustainability strategy as a United Nations Sustainable Development Goal (SDG 5) that is particularly relevant to us. The internal and external communication of this goal sends a clear signal to both potential managers and to decision-makers at all management levels during selection processes. When it comes to filling management positions in the Group, men and women should be hired purely on the basis of professional and personal aptitude. Furthermore, an open-minded working environment with regard to sexual orientation and gender identity is a decisive criterion for us to be perceived as a modern employer.

**Employee networks** play a key role for us within the Group by creating a platform for the exchange of experiences and perspectives. These networks promote an inclusive corporate culture in which diversity is seen as a strength. They are also designed to help raise awareness of diversity and inclusion and enable effective collaboration that benefits from different backgrounds and perspectives. Along with the employee network PROUD@ProSiebenSat.1 (an LGBT+ network - Lesbian, Gay, Bisexual and Transgender), we therefore support our women's network F-Empowerment and the new cultural diversity network Culture Matters, which was founded in 2023.

Our aim is to create an inclusive working environment in which everyone is treated with equal respect. For us, this also includes equal language. For this reason, we have issued a recommendation to our employees in 2021 to use **gender-sensitive language**. This approach is presented during the welcome days for the onboarding of all new employees.

More information on diversity and inclusion in the 2023 Annual Report, p. 59ff:

<https://www.prosiebensat1.com/en/investor-relations/publications/annual-report>



## 4. QUESTIONS ON JOURNALISTIC RESPONSIBILITY

### 4.1 What are the company's journalistic goals? How does it intend to achieve them?

Strengthening brands and creating unforgettable moments - that is the core of our Group and what drives us every day. We inform, entertain and connect people around the clock. We offer them products, services and experiences that enrich their everyday lives. This is how we reach millions of people every day.

We show entertainment and information on all platforms - live and on-demand. In doing so, we also make an important **contribution to opinion-forming and diversity of opinion**. We use the wide reach of our entertainment offerings to make brands known and create environments in which they can grow sustainably. This benefits not only the brands of our advertising customers, but also our own consumer brands in the Dating & Video and Commerce & Ventures segments. Here, we invest in digital brands and business models as well as international platforms with long-term growth prospects and high synergy potential with our Entertainment segment.

With the **action area "Public Value & Corporate Citizenship"**, ProSiebenSat.1 has emphasized the aspects of opinion-forming and the placement of socially relevant topics as key components of its commitment to sustainability. The aim is to integrate these aspects even more strongly into the programming of our TV stations and on our digital platforms. The Group Sustainability Office and the sustainability segment leads in the three segments work to increase public value content by communicating the sustainability strategy in the Group and driving the continual dialogue with the relevant interfaces throughout the Group.

The journalistic goals are communicated in the sustainability report and via the corporate website:

<https://www.prosiebensat1.com/en/sustainability/action-areas/public-value-corporate-citizenship>

### 4.2 What processes are used to maintain journalistic responsibility?

The principles for upholding journalistic responsibility are set out in the ProSiebenSat.1 Group's Code of Conduct, which applies throughout the Group. Among other things, it addresses journalistic independence, the principles of separating advertising and programming, and requirements for the protection of minors.

In all our activities, we are committed to the free and democratic order, which is based in particular on the fundamental right to freedom of opinion. The central editorial team of Seven.One Entertainment Group is responsible at operational level for ensuring journalistic independence in the editorial work of all stations. In daily conferences with the editorial teams and programming managers, the focus areas for the content of reporting and programming are discussed. The fundamental dual-control principle applies when approving editorial content. In addition, the Group has formulated guidelines which all journalists and editorial staff are required to follow. The "Guidelines for Ensuring Journalistic Independence" specify the understanding of the journalistic principles set forth in the Press Code of the German Press Council. According to these principles, journalists are essentially free to prepare their editorial content as they see fit and should report independently of social, economic or political interests. Topics such as press law and youth protection are trained and deepened in internal training courses.



## Protection of minors

Provisions for the protection of young people are also considered very important in the context of media regulation. The ProSiebenSat.1 Group's youth protection officers play a key role in this regard. They are responsible for ensuring that all TV and online content for which the Group is responsible is offered in an age-appropriate way. The goal is to make it difficult for children and young people to gain access to content that is unsuitable for their age group. The German Interstate Treaty on Youth Protection in the Media (Jugendmedienschutz-Staatsvertrag, JMStV) and the German Youth Protection Act (Jugendschutzgesetz, JuSchG) stipulate clear requirements for this. The youth protection officers are autonomous in their assessments and are responsible for advising stations so that content that is unsuitable for children and young people is broadcast only at the legally stipulated times. Moreover, the youth protection officers are involved in the conception, production, and purchasing of programs as early as possible. At the same time, they are expected to ensure that technical means, such as PIN procedures or the filtering software JusProg, are used for dissemination of content that is relevant to the protection of young people on the Group's websites. The youth protection officers carry out internal training for TV and online editors and participate in the certification program in accordance with JuSchG themselves.

In addition, youth protection is actively involved in the committees of the Voluntary Self-Regulation Body for Television (FSF) and the Voluntary Self-Regulation Body for Multimedia Service Providers (FSM).

## 4.3 What efforts are made to gather and validate information?

We aim to reach all social groups and, above all, to adequately address young people. We believe we have a responsibility to explain and contextualize current social and political developments for our viewers and users. We are systematically pursuing this ambition: Since January 2023, Seven.One Entertainment Group has produced all the broadcasting group's news formats itself at an **in-house newsroom with a staff of around 60 journalists**. In addition to studios at our headquarters in Unterföhring, we operate a capital city studio very close to the German government at Potsdamer Platz in Berlin. Since 2023, the news broadcasts on ProSieben, SAT.1 and Kabel Eins along with all news offerings in the digital domain and on Joyn are bundled under the shared :newstime brand with the aim of delivering a more comprehensive and consistent journalistic offering for various target groups around the clock.

Further information on journalistic responsibility and the independence of editorial work can be found here:

<https://www.prosiebensat1.com/en/sustainability/action-areas/governance-compliance>

## 4.4 How are backgrounds explained and topics accompanied?

We are aware of the high level of attention our products receive and aim to use the wide reach of our TV channels and platforms responsibly.

We generate **public value** by raising public awareness of socially relevant issues with our programs and campaigns. With its own newsroom, the station group can react flexibly and promptly to current news situations and offer a comprehensive range of information. In 2023, for example, the main news bulletins on SAT.1 were extended by ten minutes to 30 minutes on Mondays to Fridays. In various special programs under the title ":newstime SPEZIAL", we provide more detailed and up-to-date information on special news situations on SAT.1 and ProSieben.



Beyond traditional news formats, we also want to **place socially and politically relevant topics in our programs** and reach people at eye level. Regular program focuses include the areas of climate and the environment as well as diversity, equality and social cohesion.

As part of the "Green Seven Week", we implemented formats such as the report "How nature protects us from climate change - 5 ideas that give hope" or several contributions to the magazines "Galileo" and "taff", which focused on overcoming environmental problems under the motto "Let's save the planet!". For the 15th time, ProSieben drew attention to sustainability and environmental issues under the "Green Seven" label.

In the format "Joko & Klaas vs. ProSieben", the two presenters Joko Winterscheidt and Klaas Heufer-Umlauf compete for 15 minutes of airtime, which they are allowed to use individually during prime time. They use the time they gain to focus on current events and relevant topics. In 2023, the presenters of "Joko & Klaas LIVE: The Treasure Hunt" sent viewers on a game show in search of new potential stem cell donors in the joint fight against blood cancer.

#### **4.5 Is sustainability classified in reporting as a cross-cutting issue that affects society as a whole?**

The program principles of the German Interstate Media Treaty (MStV) already stipulate the requirement for private-sector broadcasters to express the **diversity of opinions** in their content and to allow important political, ideological and social actors to have their say in an appropriate manner. In addition, the MStV guarantees that media offerings that are particularly valuable for the formation of public opinion and media diversity will be easier to find on media platforms. The criteria used to determine these types of media offerings were defined in the statute on public value adopted by the German state media authorities. As part of a subsequent selection procedure, ProSieben, SAT.1, and Kabel Eins were considered to offer public value with their broadcasting and telemedia offerings.

The comments on question 4.4 describe various program focuses that address sustainability issues in the areas of climate and the environment as well as diversity, equality and social cohesion in our programs.

In addition, we regularly position ourselves on **socially relevant topics through attitude campaigns**. For example, ProSieben campaigned for a diverse society under the slogan "We are one" on the International Day against Racism and on Christopher Street Day. On International Women's Day, SAT.1 drew attention to the discrimination and inequality that still exists between the sexes. It also brought the topic of domestic violence to prime-time viewers with the documentary "Endlich frei! Das SAT.1-Event zum Weltfrauentag" (Free at last! The SAT.1 event on International Women's Day).

#### **Accessible offerings**

The ProSiebenSat.1 Group is committed to barrier-free access to its offerings. Among other things, our stations offer subtitled programming, audio descriptions for the blind and visually impaired, formats in sign language and, since 2023, in easy language in order to make program content accessible to as many viewers as possible.

ProSieben launched the first regular subtitle service for the deaf on German private television back in 2000. The Group broadcasts accessible content on nearly all its free TV stations and continually drives its expansion ever since. In 2023, the range of **programs with subtitling was expanded** and, in particular, the number of formats with additional **audio description and sign language was increased**. Specific examples include the finale of "Germany's Next Topmodel - by Heidi Klum" on ProSieben, the entire season of "Zurück in die Schule" (Back to School) on SAT.1 and the broadcast of the coronation of King Charles III: "SAT.1. Das ist die Krönung!". These programs were available in barrier-free



formats with subtitles, audio description and in sign language. Deaf performers appeared live for the first time in the finale of "The Voice Kids". By expressing themselves through facial expressions, gestures and movement, they bring the music to life for viewers with impaired hearing. Likewise, the musical performances at the BAMBI awards were accompanied by deaf performances for the first time, both on linear TV and for streams on Joyn. SAT.1 also broadcasted the award ceremony with live subtitles and audio description. For International Women's Day in 2023, easy-to-read language subtitles were offered for the first time for the "Endlich frei!" (Free at last!) format on SAT.1. We further **expanded our easy language offerings** with highlight clips and magazine features on the Special Olympics World Games 2023 on ProSieben. For the future, we aim to further expand our barrier-free offerings.

Subtitles are currently available on five German ProSiebenSat.1 channels: SAT.1, ProSieben, Kabel Eins, sixx and ProSieben MAXX. In addition, the Austrian channels Puls 4, Puls 24, ATV1 and ATV2 as well as the Swiss channel Puls8 broadcast programs with subtitles.

#### 4.6 Is artificial intelligence being used responsibly in editorial processes?

The topic of artificial intelligence (AI) is becoming increasingly important at ProSiebenSat.1, with the aim of enabling **responsible interaction** between people and modern technologies and driving forward the Group's digitalization. ProSiebenSat.1 is therefore working intensively on how we can integrate AI into daily business processes and support the Group in achieving strategic milestones. Current fields of application are mainly geared towards the strategic areas of our Entertainment segment and support the production of our content as well as the strengthening and monetization of our reach.

To regulate artificial intelligence (AI), a regulatory and legal framework for the supply and use of all types of AI in the EU was created at European level in December 2023 with the Artificial Intelligence (AI) Act. The use of AI is of great relevance for ProSiebenSat.1, as it can optimize existing processes and open up new opportunities in terms of content creation, among other things. The AI Act is therefore also relevant for the ProSiebenSat.1 Group, as it is expected to define transparency obligations with regard to AI-generated support for image, sound and video content, among other things.

As a media group, it is essential for ProSiebenSat.1 to use AI in its editorial work as a supporting tool and in compliance with journalistic due diligence obligations. For this reason, the editorial team developed **editorial guidelines** in 2023 to ensure the responsible use of artificial intelligence in the journalistic process.

These include, among other things:

- **Comply with journalistic due diligence:** All sources, data and facts provided by AI tools must be checked and texts must be thoroughly edited. AI-generated content must not be distributed automatically.
- **AI must offer an editorial benefit:** AI should only be used if it offers added value for everyday editorial work. AI can, for example, replace editorial, repetitive processes in order to create more freedom for creativity and journalistic tasks.
- **Transparency and mandatory labeling:** AI-generated content such as deepfakes, which will be subject to mandatory labeling when the EU AI Act comes into force, is already being labeled by us today (in accordance with the upcoming legal requirements). In addition, we point out the use of generative AI when it is ethically required by the press
- **Pay attention to political orientation:** AI-generated texts must be checked to see whether they have a political bias or lobbying slant. Our aim is to provide independent, non-biased reporting.



- **AI and data protection:** AI chatbots should not be fed with sensitive data and contacts. Only tested AI tools that comply with data protection guidelines should be used.