



ProSiebenSat.1
Media SE



NACHHALTIGKEITSPAKT
MEDIEN

SUSTAINA- BILITY PACT FOR THE MEDIA

Answers of ProSiebenSat.1 Media SE
to the main questions of the
Sustainability Pact for the Media

Status as of September 2025

ABOUT THE SUSTAINABILITY PACT FOR THE MEDIA

As a founding member of the “Nachhaltigkeitspakt Medien” (Sustainability Pact for the Media), we want to provide an impulse for the responsible development of a more sustainable media industry. Coordinated by the Bavarian Regulatory Authority for New Media (BLM), we have worked with other founding members such as Vodafone, Amazon Prime Video, Bayerischer Rundfunk, egoFM, representatives from the scientific community, and the Bavarian Journalists' Association to develop 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 a reasonable investment of time and personnel and to anchor sustainability and public value in their companies.

Since May 2024, the Media Sustainability Pact has also been open to companies based outside Bavaria and aims to further develop its industry-specific understanding of sustainability with players from across the German media landscape. In addition, the guidelines have been 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?

The ProSiebenSat.1 Group is one of the most dynamic media companies in Europe and one of the leading independent entertainment providers in the German-speaking world.

We are clearly focused on our core business and have implemented further steps in 2024 to integrate our digital and linear entertainment offerings even more closely. Our goal is to become the number one entertainment company in the DACH region, with a focus on fast-growing digital business models and our streaming platform Joyn. To achieve this, we are concentrating on three strategic priorities: investing in attractive programming content, maximizing our reach, and diversifying our monetization.

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

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

The ProSiebenSat.1 Group also wants to contribute to this transformation. In the course of developing its strategy, the Group has identified the following six goals as particularly relevant to 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 CO₂e emissions, which has been in place since 2021 as a subcomponent of the short-term incentive, was 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 CO₂e emissions and expanding accessible offerings each being weighted at 10%. In 2024, the ESG target for the reduction of operational CO₂e emissions was exceeded. The targets for the expansion of programs with subtitles for the deaf, programs with audio description, and programs in easy language were also achieved or slightly exceeded. The target for the number of programs with sign language was missed by one program.

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](#)

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](#)

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 Group bears the strategic responsibility for compliance with all relevant legal and ethical standards. The basis for this is a **Group-wide Compliance Management System (CMS) with integrated Legal Monitoring**, which continuously records national and international legal changes as well as regulatory developments. The specialist departments carry out their Legal Monitoring independently and are obliged to integrate new or changed requirements into their processes promptly. Compliance is continuously monitored through binding guidelines, regular audits, training, and a central whistleblower system, and ensured with appropriate measures if necessary.

An extensive presentation of the concepts and measures in the area of Governance can be found in the Annual Report 2024 on p. 215ff.:

[ProSiebenSat.1 Media SE – Annual Report](#)

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

The ProSiebenSat.1 Group's supply chain strategy is based on clearly defined ethical, social, and ecological standards, which are anchored in the ProSiebenSat.1 Group's **Code of Conduct**. These principles are made binding via a separate Code of Conduct for business partners, which transparently formulates our expectations of ethical, responsible conduct and serves as the basis for every business relationship. Compliance with these standards is already taken into account when selecting and qualifying suppliers. The Code of Conduct for business partners is published here:

[ProSiebenSat.1 Media SE – Compliance Documents](#)

To monitor and enforce these requirements, the ProSiebenSat.1 Group uses, among other things, a **whistleblower system** that complies with international and national requirements, such as the EU Whistleblower Directive and the Supply Chain Due Diligence Act. This ensures that potential violations are identified early and dealt with appropriately.

An extensive presentation of the concepts and measures for managing supplier relationships can be found in the Annual Report 2024 on p. 220f. Information on the whistleblower system and how to deal with possible rule violations can be found on p. 217ff:

[ProSiebenSat.1 Media SE – Annual Report](#)

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.

Further information on the Group's financial and liquidity situation can be found in the Annual Report 2024 on p. 129f.:

[ProSiebenSat.1 Media SE – Annual Report](#)

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

The ProSiebenSat.1 Group is one of the most dynamic media companies in Europe and one of the leading independent entertainment providers in the German-speaking world. Due to the diversity in our portfolio, we have everything we need to reach millions of people every day with our content. In Germany alone, it was almost 60 million in 2024.

We are clearly focused on our core business and have implemented further steps in 2024 to integrate our digital and linear entertainment offerings even more closely. Our goal is to become the number one entertainment company in the DACH region, with a focus on fast-growing digital business models and our streaming platform Joyn. To achieve this, we are **concentrating on three strategic priorities**: investing in attractive programming content, maximizing our reach, and diversifying our monetization.

We increase our reach by offering content via a wide selection of channels and by investing more in local and live programs. Through such own content, we sharpen the core of our brands and differentiate ourselves from competitors, especially from international streaming providers. At the same time, we are responding to the structural changes in media usage, especially with Joyn, and addressing new target groups in both the viewer and advertising markets in addition to classic linear television. In this way, we expand the possibilities for monetization. In addition, we supplement our portfolio around our core entertainment business with digital offerings in the Commerce & Ventures and Dating & Video segments, thus diversifying the revenue profile.

Further information on the Group's strategy and goals can be found in the Annual Report 2024 on p. 87ff.:

[ProSiebenSat.1 Media SE – Annual Report](#)



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 greenhouse gas neutrality by 2030**. To this end, we have continually reduced our operational emissions since the target was set in 2019 (base year). In 2024, we were able to reduce these by 12% compared to the previous year.

We want to achieve this goal primarily through sustainable energy supply and a conversion of the vehicle fleet to locally emission-free e-mobility. In addition, the initiative "Sauber gedreht!" ("Clean Shot!") for more sustainable film and television productions was fully applied in 2024, and collaboration on industry-wide ecological standards in the Green Shooting working group was continued.

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 working on a further **development of the climate strategy according to the requirements of the Science Based Targets Initiative (SBTi)**, whose validation is aimed for in 2025.

More information on this can be found in the Annual Report 2024, p. 164ff.:

[ProSiebenSat.1 Media SE – 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, which is audited by 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.

A selection of **current sustainability ratings** can be found in the ESG Information section of the company presentation:

[ProSiebenSat.1 Media SE – Company Presentation](#)

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

The Code of Conduct for Business Partners is part of all supplier contracts and includes, among other things, requirements for social and ecological responsibility. 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 greenhouse gas neutrality by 2030, we will gradually increase the proportion of sites with electricity from renewable energies.



Further information on this can be found here:

[ProSiebenSat.1 Media SE – Purchasing](#)

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 waste heat from our own data centers for heating purposes. The ongoing conversion to LED lighting in the offices and production studios is also increasing energy efficiency. In addition, a 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 Unterföhring campus. Furthermore, 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 **initiative “Sauber gedreht!” (“Clean Shoot!”)**, Seven.One Entertainment Group GmbH (“SevenOne Entertainment Group”) already developed an extensive package of measures in 2019 to make film and TV productions more sustainable. The initiative defines requirements and recommendations for production companies to reduce CO₂e emissions and conserve resources. This package of measures was fully implemented during the 2024 financial year. As a member of the Green Shooting working group, the Group collaborates with numerous representatives from the film and television industry, as well as film funding institutions, to continually refine the ecological standards adopted for the audiovisual production industry in October 2021. Since 2023, compliance with these standards has been a mandatory requirement for receiving funding for film and series production.

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. Since May 2023, only electric vehicles have been available to order as company cars. There are now over 100 charging stations on the Unterföhring campus (as of Q1 2025). These 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. We offer our advertising customers various ways to demonstrate their commitment to sustainability, such as co-branding campaigns, accessible commercials or collaborations. Additionally, all TV commercials and some digital campaigns offer the option of balancing and compensating for CO₂ emissions.

Further options and information can be found here:

[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 forming the focus of its sustainability activities (see the explanations provided in response to question 1.1). Two of these areas 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**. Our guiding principle here is: 'We campaign for socially relevant issues'. We achieve this by supporting voluntary engagement, social initiatives, and organisations. Additionally, we aim to provide our employees with the opportunity to participate in voluntary work, enabling them to witness the positive impact of their efforts on society and their personal growth.

The use of our **wide media reach** is particularly effective: We provide social initiatives and NGOs with heavily discounted or **free gross media space**. In doing so, we contribute significantly to increasing their public awareness and supporting important fundraising appeals. For efficient emergency and disaster relief, we have also established a proven Disaster Response Team, which ensures efficient coordination and thus rapid and effective help for NGOs.

In 2024, monetary donations, material donations and, in particular, pro bono gross media space donations, which in individual cases amounted to a single-digit million euro sum for some charitable partners, were made. For instance, we supported **Aktion Deutschland Hilft** with a campaign commemorating the victims of the earthquake in Turkey and Syria, and we provided **UNICEF** with pro bono gross media space for humanitarian emergency aid in the Middle East conflict.

We are particularly proud of our continued, long-standing partnership with the **startsocial association**. As a founding member, we have supported the association 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 phase together with two coaches from the business world during a four-month consultation.

Further details on the objectives and measures can be found on our website and in the Sustainability Report in the Corporate Citizenship section (Annual Report 2024, p. 204f.):

[ProSiebenSat.1 Media SE – Public Value & Corporate Citizenship](#)

[ProSiebenSat.1 Media SE – Annual Report](#)

The Group-wide published "Diversity Principles" illustrate our **commitment to diversity and inclusion**. These principles form the basis of our actions, through which we aim to promote tolerance and diversity - within our company and wider 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 importance of socially sustainable goals was emphasised further 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 2024, in the chapter Social Information – Company Workforce on p. 181ff.:

[ProSiebenSat.1 Media SE – 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 the ProSiebenSat.1 Group. At the same time, it is crucial to our appeal as an employer and our strong performance culture that we offer qualified and committed employees opportunities for development and retain them in the long term by providing an **attractive working environment**. ProSiebenSat.1 has therefore identified the following key areas of its company-wide, strategic human resources work: Talent Acquisition, Employee Development and Retention, and Leadership Development.

ProSiebenSat.1 is also convinced that a working environment characterized by **equal opportunities and appreciation** promotes the full development of every employee's potential. Therefore, our goal is to create a working environment that is free of prejudice and shows all employees the same high level of appreciation and respect – regardless of age, disability, ethnic origin and nationality, gender and gender identity, religion and ideology, as well as sexual orientation and identity. ProSiebenSat.1 is therefore committed to diversity within its own workforce, gender equality, and the inclusion of people with disabilities. Regular initiatives are intended to promote dialogue on our values and support our employees in integrating them into their daily work.

An extensive presentation of the concepts and measures as well as key figures related to the company's workforce can be found in the Annual Report 2024, p. 181ff.:

[ProSiebenSat.1 Media SE – Annual Report](#)

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: [ProSiebenSat.1 Media SE – Compliance Documents](#)



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

The ProSiebenSat.1 Group sees diversity and inclusion not only as a matter of social responsibility, but also as a decisive factor for economic success and sustainable growth. For us, diversity means recognizing and valuing difference and individuality.

Our corporate culture thrives on the diversity of our employees and their different perspectives, experiences, and talents. ProSiebenSat.1 is convinced that a working environment characterized by equal opportunities and appreciation promotes the full development of every employee's potential. Therefore, our goal is to create a working environment that is free of prejudice and shows all employees the same high level of appreciation and respect. Against this backdrop, the ProSiebenSat.1 Group signed the **Diversity Charter** in 2014 and adheres to the guidelines set out in it. Our internal guidelines also stipulate that employees at all hierarchical levels should be hired exclusively on the basis of 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** of our Group-wide sustainability strategy. In addition, anti-discrimination is conceptually enshrined in our Code of Conduct. With the **Group-wide published "Diversity Principles"**, we want to clearly demonstrate 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.

Detailed information on concepts and measures for diversity and inclusion can be found in the Annual Report 2024 on p. 185ff.:

[ProSiebenSat.1 Media SE – Annual Report](#)

The Diversity Principles can be accessed here: [Diversity Principles ProSiebenSat.1 Group](#)



4. QUESTIONS ON JOURNALISTIC RESPONSIBILITY

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

The ProSiebenSat.1 Group is one of the most dynamic media companies in Europe and one of the leading independent entertainment providers in the German-speaking world. Thanks to the diversity in our portfolio, we reach millions of people every day and make an important contribution to **opinion-forming and diversity of opinion**. Our strategic priority is clearly on our core entertainment business: attractive content, high reach, and more digital revenue. We consistently pursue this approach to respond to trends in media usage. At the same time, we want to further optimize our portfolio through a clear focus and increasingly integrate our digital entertainment offerings with our linear programs.

Our goal is to become the number one entertainment company in the DACH region – with fast-growing digital business models and the streaming platform Joyn as the centerpiece of our strategy. However, sustainable success for ProSiebenSat.1 does not only mean improving the Group's economic results. Our management system is holistic and reflects non-financial goals in addition to financial growth targets.

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 and **to reach all social groups**, especially young people, with our media content. We see it as our core task to prepare and contextualize current social and political developments in an understandable way for our audience. The Group Sustainability Office and the sustainability managers in the three segments work to expand Public Value content by communicating the sustainability strategy within the Group and continuously promoting dialogue with the relevant interfaces Group-wide.

The journalistic goals are communicated in the Annual Report 2024 from p. 200f. and via the corporate website:

[ProSiebenSat.1 Media SE – Public Value & Corporate Citizenship](#)

[ProSiebenSat.1 Media SE – Annual Report](#)

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**. 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.

Not least, youth protection regulations in the context of media regulation are of great importance. **The youth protection officers** of the ProSiebenSat.1 Group play a central 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).

Detailed information can be found in the Annual Report 2024, in the chapter Social Information – Corporate Social Responsibility – Media Regulation on p. 195ff.:

[ProSiebenSat.1 Media SE – Annual Report](#)

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 in an understandable way. We are systematically pursuing this ambition: Since January 2023, the Seven.One Entertainment Group has produced all the broadcasting group's news formats itself with 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. Furthermore, 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 due diligence and the independence of editorial work is communicated in the Annual Report 2024 from p. 200f. and via the corporate website:

[ProSiebenSat.1 Media SE – Public Value & Corporate Citizenship](#)

[ProSiebenSat.1 Media SE – Annual Report](#)

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 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. In 2024, for example, the US election was covered live for ten hours on Joyn, SAT.1, and ProSieben on election night.

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.

In view of important elections – from the European and state elections in Germany to the National Council election in Austria and the US elections – a central editorial focus in 2024, beyond classical news, was the **active promotion of democracy and participation in democratic discourse**. A multitude of reportages were broadcast during prime time to reach the widest possible target group and provide a common basis for social discourse. For example, in the reportage series “RONZHEIMER – Wie geht’s Deutschland?” (RONZHEIMER – How is Germany doing?), current problems and social sentiments on topics such as right-wing extremism and migration were captured, and Linda Zervakis dealt with the importance of artificial intelligence for democracy in “ProSieben THEMA”.

Equally noteworthy is the program **"Joko & Klaas LIVE"**, in which the presenters Joko Winterscheidt and Klaas Heufer-Umlauf specifically used their won airtime for socially relevant topics. They visualized the importance of the EU under the hashtag #waswäreWenn (#whatif) and called for participation in the European elections, or allowed chancellor candidates from three major democratic parties to comment on #PolitikUndAnstand (#PoliticsAndDecency). Further information can be found in the Annual Report 2024 from p. 200f. and on the Group's website:

[ProSiebenSat.1 Media SE – Public Value & Corporate Citizenship](#)

[ProSiebenSat.1 Media SE – Annual Report](#)

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. 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, the broadcasting group campaigns for a diverse society with the broad campaign under the motto "Gemeinsam gegen Rassismus" (Together against Racism) and on the occasion of Christopher Street Day. In the run-up to the European elections, celebrities called for participation in the European elections in various informative trailers, and in February 2025, a "Go Vote" campaign was implemented on the group's channels for the early federal election. Furthermore, in 2024, the media partnership with the Special Olympics initiative was continued, which advocates for



greater recognition and social participation of people with intellectual and multiple disabilities through inclusive sporting events.

Accessible offerings

The ProSiebenSat.1 Group is committed to barrier-free access to its offerings. Among other things, our stations and Joyn 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. Since 2024, additional livestreams of the channels SAT.1, ProSieben, and ProSieben MAXX with sign language or audio description are offered on Joyn, which can be selected as a separate channel parallel to the channel livestreams when programs with sign language or audio description are available. Concrete program examples for comprehensively accessible programs include the show “Germany’s Next Topmodel – by Heidi Klum” on ProSieben or “The Taste” on SAT.1. These programs were offered accessibly with subtitles, audio description, and in sign language. For the music shows “The Voice Kids” and the final show of “The Voice of Germany” on SAT.1, we use Deaf Performers in addition to sign language interpreters. They express themselves through facial expressions, gestures, and movement, making the music tangible for people with hearing impairments. Information offerings are also broadcast with sign language in addition to subtitling; for example, the live coverage of the US election in the program “:newstime Spezial – Kampf ums Weiße Haus” (Battle for the White House) was accompanied by sign language interpreters throughout the election night on Joyn.

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. Further information on accessible offerings is communicated in the Annual Report 2024 from p. 197f.:

[ProSiebenSat.1 Media SE – Annual Report](#)

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 regulations contained in the AI Act must be implemented by companies within a period of six months to two years after its entry into force. 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, especially with regard to transparency obligations for AI-generated image, sound, and video content as well as the provision of necessary AI competence to employees.



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 already 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.