



## GUIDELINES FOR ENSURING JOURNALISTIC INDEPENDENCE

### **Preamble**

The journalists and supervising editors of the ProSiebenSat.1 Group are fully aware of the responsibility that come with providing information and influencing opinions in Germany. Independence is an indispensable prerequisite of their work.

These guidelines concretize the Group's understanding of the journalistic principles embodied in the Press Code of the German Press Council.

The Group's editors, and especially its chief editors, are responsible for ensuring compliance with these principles and for implementing them in the Group's day-to-day activities.

### **Journalistic principles**

The ProSiebenSat.1 Group is committed to upholding the free democratic system embodied in the Basic Law of the Federal Republic of Germany. Furthermore, the ProSiebenSat.1 Group is committed to upholding the social free market system. It supports the solidarity of Germans in the unified Germany, as well as European integration and international understanding.

The ProSiebenSat.1 Group advocates for the effective application of the principle of freedom and human dignity in all areas of a free society. Compliance with all provisions of law aimed at protecting personal honor is assured. The employees of the ProSiebenSat.1 Group respect the customs, religious convictions and world views of others. The company's reporting preserves the dignity of the individual.

### **Protection of journalistic independence**

News stories may not be influenced by the private or business interests of third parties or by the personal or economic interests of employees.

As a general rule, the journalists of the ProSiebenSat.1 Group do not report on related persons, and especially family members, except in the presence of an objective reason to do so, which must be approved by the employee's supervising manager.

The journalists of the ProSiebenSat.1 Group do not use their reporting as a means of attaining advantages for themselves or others. The acceptance of direct or indirect financing or in-kind benefits in connection with news reporting is prohibited. As a general rule, personal conflicts of interest are brought to the attention of the chief editors.

Such conflicts of interest could arise from the employee's membership or holding of offices or mandates in clubs, parties, associations or other institutions, for example, or also from permitted secondary employment activities.

The journalists of the ProSiebenSat.1 Group are particularly careful to fulfill the statutory and professional ethics obligations of the media relative to insider information, as they are summarized in the "journalistic principles of conduct concerning insider and other information that could potentially influence the prices of securities" published by the German Press Council. The guidelines and interpretations set out in Section 34b of the German Securities Trading Act apply.



## **Invitations and gifts**

Article 15 of the Press Code covers the risk to independent journalistic work posed by the attainment of personal advantages.

The costs incurred in connection with researching and producing news reports must be borne by the respective news organizations of the ProSiebenSat.1 Group. Any exceptions must be approved by the chief editor.

The employees of the ProSiebenSat.1 Group do not accept any gifts that are suggestive of personal enrichment.

## **Advertising**

The ProSiebenSat.1 Group is committed to maintaining the strict separation of editorial news content from publications for advertising purposes. All necessary steps are taken to ensure the strict separation of advertising from program content. Employees are strictly bound to comply with the provisions of the Interstate Broadcasting Agreement and the Joint Guidelines of the State Media Authorities on advertising and the effective separation of advertising from program content and sponsoring in television. In particular, every employee is obligated to ensure compliance with the prohibition of measures to influence programming, covert advertising and the related identification requirements. Steps are taken to ensure that the content and broadcast slot of a sponsored program cannot be influenced by the sponsor in such a way that would compromise the responsibility and editorial independence of the respective broadcaster. Production support afforded by third parties (so-called promotional consideration) is identified in accordance with the applicable provisions of law ("promotional consideration furnished by"); such notice is usually made at the end of the respective program.

The employees of the ProSiebenSat.1 Group reject attempts by advertising customers or interested parties to influence program content and do not enter into any agreements that would undermine their journalistic independence. To the extent necessary, merchandising campaigns and media partnerships are clearly identified as such.

## **Journalistic duty of care**

The appropriate level of journalistic care is applied to verify the accuracy of news and information stories and ensure that the truthfulness of news and information stories is not distorted or falsified by the presentation. The ProSiebenSat.1 Group observes the relevant provisions of the Interstate Broadcasting Agreement and the principles set out in the media laws of the German federal states.

The journalists of the ProSiebenSat.1 Group always verify the source of picture materials delivered to the organization. Specific reference is made to any censorship exercised by third parties, especially in the case of picture materials from war zones or from countries in which media censorship is exercised. There must always be an overriding journalistic reason for presenting depictions of violence and atrocities.

## **Creative discretion**

Within the scope of the guidelines set forth herein, the journalists of the ProSiebenSat.1 Group are fundamentally entitled to produce their work according to their own creative discretion.