

# SUSTAINABILITY

## REPORTING STANDARDS AND MATERIAL TOPICS

This sustainability chapter summarizes the key environmental, societal and social developments at ProSiebenSat.1 Group. In combination with the other content of the Annual Report 2020, this provides a comprehensive description of ProSiebenSat.1 Group's performance on the basis of financial and non-financial information. The sustainability chapter comprises the ProSiebenSat.1 Group Sustainability Report prepared in accordance with the standards of the Global Reporting Initiative (GRI) "Core" option. The complete GRI content index can be found in the "Information" section in the Annual Report 2020. In addition, the sustainability chapter serves as the Communication on Progress (COP), which all companies participating in the UN Global Compact are obliged to publish annually.

The sustainability chapter contains the combined separate Non-financial Report (NFR) for ProSiebenSat.1 Media SE and ProSiebenSat.1 Group in accordance with section 289b (1) and (3) and section 315b (1) and (3) of the German Commercial Code (HGB). The content of the NFR is marked by a grey line on the left or right edge of the page next to the text. In preparing the NFR, we are guided by the GRI standards as an international framework for sustainability reporting. In the NFR for financial year 2020, ProSiebenSat.1 Group reports on the main non-financial aspects with the corresponding information needed in order to understand the parent company's and the Group's business development, results and position and the effects of the business activities in this regard. Material risks for individual non-financial aspects were not determined in this context. The non-financial Group report has been combined with the parent company's Non-financial Report within the meaning of section 315b (1) sentence 2 HGB. Unless stated otherwise, the disclosures in this report relate to both, the Group and the parent company.

In accordance with section 317 (2) sentence 4 HGB, the auditor checked that the NFR was presented in line with the legal requirements. The Supervisory Board also commissioned Ernst & Young GmbH Wirtschaftsprüfungsgesellschaft to audit the content of the NFR with reasonable assurance. The audit opinion dated February 25, 2021, which describes the type, scope and findings of this audit, is reproduced in the "Information" section in the Annual Report 2020. The audit was conducted using the relevant auditing standards "Assurance Engagements other than Audits or Reviews of Historical Financial Information (ISAE 3000 revised)" in order to obtain reasonable assurance with regard to the legally required disclosures in accordance with sections 315b and 315c in conjunction with sections 289b to 289e HGB.

In 2017, we conducted a materiality analysis due to the first-time application of the CSR Directive Implementation Act, which complied with both the statutory requirements and the

definition of materiality according to GRI, and have validated it annually since then. We recently reviewed the definition of material topics in December 2020 in the form of a survey of the members of the ProSiebenSat.1 Group Sustainability Committee. To this end, the participants reevaluated the materiality of the sustainability issues classified as material to date from three perspectives (relevance to business success, impact of the Company, and importance for stakeholders). Compared to the NFR and Sustainability Report from 2019, there were no significant changes in the reported topics.

The topics reported are essentially the result of the regular validation of the materiality analysis, the implementation and development of the ProSiebenSat.1 sustainability strategy, and the continuous dialog with internal and external stakeholder groups. This particularly includes the dialog with employees on sustainability issues and with ESG analysts in the course of capital market ratings as well as responding to press inquiries and media monitoring.

### CONTENTS OF THE COMBINED NON-FINANCIAL REPORT (NFR)

Aspects and disclosures in accordance with section 289c HGB	Reported topics	Reporting in sustainability chapter
Environmental matters	Not material within the meaning of section 289c (3) HGB	n/a
Employee-related matters	Talent acquisition, employee retention and people development, diversity management	Employees, Diversity
Social matters	Social responsibility, product governance (data protection and media regulation)	Society, Governance & Compliance
Respect for human rights	Anti-discrimination	Society
Prevention of corruption and bribery	Anti-corruption and antitrust law	Governance & Compliance

For the required information on the business model in accordance with section 289c (1) HGB, please refer to the section "Organization and Group Structure" of ProSiebenSat.1 Group's Management Report. All other references to content outside this NFR are to be understood as additional information and not as part of this NFR.

According to the GRI definition, aspects that report on the key economic, environmental and social impacts of the organization or that significantly influence the assessments and decisions of stakeholders are classed as material. Based on this different definition of materiality as compared to the NFR, the Sustainability Report includes additional topics, including the environment and climate protection, which can also be found in the action areas of our sustainability strategy.

## ADDITIONAL CONTENTS OF THE SUSTAINABILITY REPORT

Reported topics	Reporting in sustainability chapter
Occupational health and safety	Employees
Accessible offerings	Diversity
Energy, emissions, waste	Environment

## REPORTING SCOPE AND DATA COLLECTION

The organizational reporting framework for the information on concepts and key figures for our sustainability performance as contained in the sustainability chapter essentially comprises all Group companies and corresponds to the scope of consolidation of ProSiebenSat.1 Group as of the end of the financial year 2020, which is managed centrally by ProSiebenSat.1 Media SE. The distinction of the scope of consolidation follows the control principle of IFRS 10. Exceptions and restrictions with regard to the scope of reporting for individual content and data collection for key figures are described below or are indicated accordingly in the information on the individual topics. Unless indicated otherwise, the statements and key figures in the section “Employees” as well as with regard to diversity management mainly relate to the HR management approach and the employees of the Group companies at the headquarters in Unterfoehring, which in addition to ProSiebenSat.1 Media SE (100% of the employees), includes in particular the largest segment Seven.One Entertainment Group (75% of the employees) and the segment Red Arrow Studios (32% of the employees) ProSiebenSat.1 Group’s portfolio companies often follow an independent HR management approach. The company agreements referred to in this report relate to the companies of the joint operation “Holding” Unterfoehring. The information on ProSiebenSat.1 Group’s social responsibility particularly relates to the Group’s business activities in

the Seven.One Entertainment Group segment. With the compliance management system (CMS), ProSiebenSat.1 Group covers Group-wide significant legal areas which are relevant for non-financial reporting (anti-corruption, antitrust law, data protection and media regulation). The media law concepts relate primarily to the companies of the Seven.One Entertainment Group segment in Germany due to different legal regulations in foreign countries and a lack of relevance to many companies, for example in the production sector.

## SUSTAINABILITY STRATEGY

The Group defines sustainable entrepreneurial activity as an integrated approach for improving its economic as well as environmental and social performance. We are aware of our corporate and social responsibility and see it as a comprehensive challenge. For ProSiebenSat.1, success not only means increasing ProSiebenSat.1 Group’s economic results long-term. It also means continuing to develop the Group’s sustainability strategy and adapting it to new challenges, improving the key non-financial figures, and reconciling the sometimes conflicting interests of our target groups, particularly those of employees, users of our offerings and platforms, shareholders and investors, and business partners. As a matter of priority, ProSiebenSat.1 pursues a dialog with stakeholders who strongly influence the Company’s financial and non-financial performance and the regulatory framework for this, and are significantly affected by the impact of the Company.

In 2018, ProSiebenSat.1 developed a Group-wide sustainability strategy. The strategy was approved by the Executive Board in 2019 and has been implemented gradually since then. The objective of the strategic process was to tie sustainability aspects more strongly to ProSiebenSat.1’s corporate strategy and to regard the Group’s economic, environmental, and social performance in a holistic way.

## ACTION AREAS AND PRINCIPLES



### Society

We form opinions and promote democracy.



### Diversity

We promote equal rights and equal opportunities.



### Environment

We are committed to ecological sustainability and climate protection.

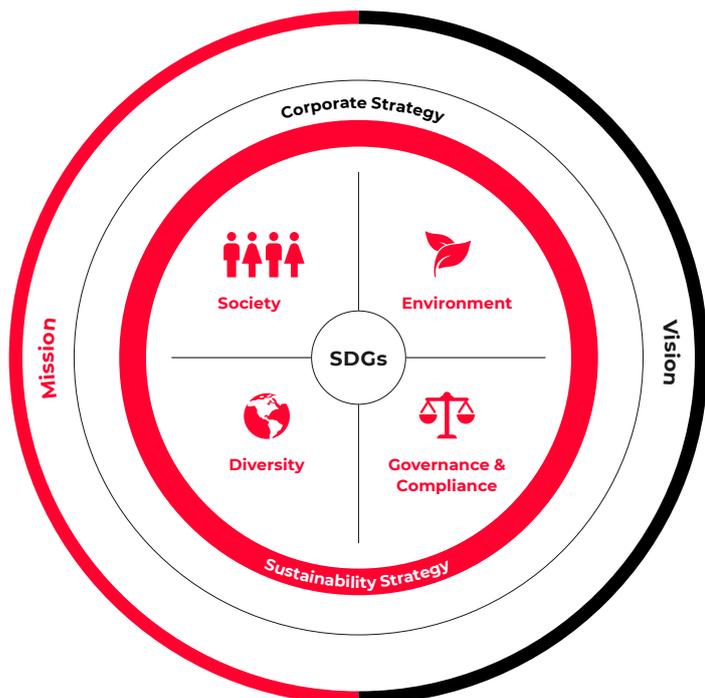


### Governance & Compliance

We stand for openness and honesty.

In addition to an analysis of the current situation and sector benchmarking, a review of the materiality analysis and a stakeholder survey also formed part of the development of the strategy. After defining priorities and selecting the relevant UN Sustainable Development Goals (SDGs), the sustainability strategy was formulated, which also included defining initial sustainability goals, strategic measures, and KPIs. In 2020, there was a particular focus on specifying and configuring the sustainability goals.

**SUSTAINABILITY STRATEGY**



Our sustainability strategy is based on the UN Sustainable Development Goals (SDGs). These define global priorities and sustainable development goals for 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 the development of the strategy, we have classified the following six goals as particularly relevant to our 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). On this basis, we have transferred our sustainability management to four action areas in which we group our activities by topic area and formulate individual principles: society, diversity, environment, and governance and compliance.

Since January 2020, ProSiebenSat.1 has also been a signatory to the United Nations (UN) Global Compact and is thus explicitly committed to its ten principles in the areas of human rights, labor standards, environment and climate, and preventing

corruption. The specific goals of the sustainability strategy and their implementation in 2020 are described in the following sections on the respective topics reported.

**ORGANIZATION AND MANAGEMENT**

Executive-level responsibility for non-financial aspects, sustainability performance indicators, and ESG (environment, social, governance) information at ProSiebenSat.1 Group particularly lies with Christine Scheffler, whose responsibilities include HR, compliance, and sustainability. In implementing the sustainability strategy, the Group took further measures in the reporting period to expand the sustainability organization and enhance the governance structures. The Sustainability Committee (formerly: Sustainability Board) represents a centralized and interdisciplinary body for managing, monitoring, and developing of the sustainability strategy. It is made up of managers and specialists from relevant central functions and operating corporate divisions as well as a works council representative. In the past year, the Sustainability Committee held two meetings. Key topics at these meetings included the presentation and discussion of the sustainability goals for 2020, updates on various projects such as Seven.One Sports' involvement in Formula E, and the presentation of ProSiebenSat.1 Group's compliance goals. In January 2020, a separate sustainability department was established in the form of the Corporate Sustainability Office. The Corporate Sustainability Office is responsible for the coordination, implementation, and communication of sustainability activities as well as the stakeholder dialog. One focus in particular is on integrating subsidiaries outside the Entertainment segment even more closely into the ProSiebenSat.1 Group's sustainability management.

**EMPLOYEES**

In the period under review, ProSiebenSat.1 Group's average number of employees (calculated on the basis of full-time equivalents) fell by 2% to 7,128 (previous year: 7,265). In 2020, an average of 368 employees (previous year: 506) were employed at ProSiebenSat.1 Media SE, of which 127 (previous year: 136) worked at the strategic holding company. The average number of employees in the Seven.One Entertainment Group segment increased (by 3% to 3,256 employees) as a result of bundling the Group's entertainment business and the associated integration of individual business areas. Due to the merger with The Meet Group, the number of employees in the newly established ParshipMeet Group rose to 436 (up 62%). The number of employees at NuCom Group fell by 4% to 1,779, primarily at be Around and due to the sale of WindStar Medical. The headcount at Red Arrow Studios also decreased (by 13% to 1,289 employees), particularly due to the impact of the COVID-19 pandemic on production business. In Germany, Austria, and Switzerland, the Group had an average of 5,981 full-time equivalents in the reporting period (previous year: 6,071). As in the previous year, this amounts to 84% of the Group as a whole.

## GROUP EMPLOYEES BY SEGMENT

Average full-time equivalents (FTEs)

Segment	2020	2019
Seven.One Entertainment Group	3,256	3,152
ParshipMeet Group	436	270
NuCom Group	1,779	1,859
Red Arrow Studios	1,289	1,477

## GROUP EMPLOYEES BY REGION

Average full-time equivalents (FTEs)

Region	2020	2019
Germany	5,535	5,612
Austria/Switzerland	447	459
US	890	968
UK	85	79
Other	172	147

In a sector that is changing faster and more radically than many other industries as a result of advances in digitalization, our employees' creativity and pace of innovation make a key contribution to our Group's success. The success factors for the future also include transforming the ProSiebenSat.1 Group into a digitally successful and diversified company. Part of this transformation is adequate human resources management: It forms part of our self-conception as an employer to create personnel-related conditions through our HR work that support the transformation process and cater to the individual interests of our employees. With our overall offer, which includes compensation based on the market standard, additional company benefit and personal development opportunities, we aim to attract, retain, and develop talented employees.

In operational terms, employee matters are the responsibility of the HR department, which is managed by the Executive Board and Chief Human Resources Officer in personal union. With a business-oriented portfolio of products, guidelines and processes, the Human Resources department helps the Executive Board, managers and employees making ProSiebenSat.1 Group attractive and successful in business in the long term. Besides quarterly reporting on personnel risks as part of Group-wide risk management, internal HR reporting plays an important role. In the HR organization, the HR Business Partners in particular are closely connected to the operating business units and are thus made aware of specific challenges. Expert teams for all HR issues – from talent & management development, talent acquisition, compensation and benefits, to labor law – round off our strategic HR work, while diversity management is also shaped by the HR organization.

Detailed information on diversity management at ProSiebenSat.1 can be found in the "Diversity" section.

In 2020, we took extensive measures to support the best possible balance of professional, personal, and family needs during the COVID-19 pandemic. As well as making working hours and locations more flexible, we resolved further measures in the reporting period to make things easier for employees with particular family responsibilities as part of the "Pandemic" works agreement, which has been extended until March 31, 2021. These include the option to reduce their work time in the short term or to convert compensation into additional vacation. In addition, employees with care responsibilities who had already used up both, their annual vacation and their working time account and did not have any other care options available, were given up to five days of special vacation.

The employee survey conducted in Germany and Austria in summer 2020, "Speak Up for P7S1," provided extensive insights into the staff's needs, particularly in the context of the Corona-crisis. Around 2,500 employees, representing roughly 60% of those eligible to participate, took part in the company dialog and contributed almost 20,000 comments sharing the experiences they had gathered in the virtual working world since the start of the COVID-19 pandemic in spring. The results are to be incorporated in the process of designing a hybrid working world for the time after the pandemic.

## Talent acquisition

We are convinced that our employees make a key contribution to the Company's success with their knowledge. In order to acquire the right talents for ProSiebenSat.1, we use various employer branding measures. One key success factor is the dissemination of relevant content for all target groups to potential candidates, for example in the ProSiebenSat.1-careers blog. At the same time, it is essential to specifically address target groups that are critical to success, such as talented employees in the tech sector. For this reason, we have adapted the P7S1 Tech-Blog in line with the needs of our target group in order to offer interested parties insights into relevant topics such as artificial intelligence (AI), addressable TV or entertainment thinking, as well as the responsible teams at ProSiebenSat.1. Organizing virtual tech meet-ups provides us another platform for making contact with talented technology specialists.

In general, women represent an important target group for ProSiebenSat.1, which is why we address them in a special way. Through regular dialog with initiatives such as "PANDA – The Women Leadership Network" and our own employer branding events specifically for female target groups, we want to position ourselves as an attractive employer for women. Our careers page (→ [careers.prosiebensat1.com](https://careers.prosiebensat1.com)) serves as a central platform for all interested parties and applicants while combining careers information with specific job opportunities. Alongside sourcing channels such as social media, direct approach, and university partnerships, we also approach new candidates via an employee recommendation program.

In total, the Group Recruiting recorded an increase to around 34,400 applications in 2020 (previous year: around 31,300); at ProSiebenSat.1 Media SE, the number of applications came to around 4,300 (previous year: around 4,500). External employer rankings such as Universum or Trendence are an important tool for our HR marketing strategy in employer branding and recruitment. The target groups for these rankings are among others school pupils, students, and graduates in the humanities, economics, and IT. At Universum, for example, ProSiebenSat.1 ranked 37th in the IT Young Professionals Ranking (previous year: 41). In the Trendence student ranking, the Company was in first place in the media/advertising category, following second place in the previous year.

Our training concepts are aimed at acquiring talented young employees for ProSiebenSat.1 Group. With journalistic traineeships, trainee programs, apprenticeships recognized by the German Chamber of Commerce and Industry (IHK), internships, and positions for working students, we offer young people a wide variety of possibilities to join our company. In this way, we intend to create a strong foundation of qualified young talents with an extensive internal network and specific company and industry knowledge. As part of the Charter for Training Programs, we also identified specific criteria for each of our training programs in 2020. The defined requirements for the trainees, trainers, and instructors aim to ensure high-quality, modern training for our junior staff.

With the skills model implemented in the reporting period, we will focus even more on skills-based recruitment in the future. The "P7S1 Skills" in the categories "Reflect," "Cooperate," "Create," "Deliver," "Know How," and "Lead & Empower" provide an overview of all skills that are important for achieving our strategic corporate goals.

## Employee retention and people development

Especially when undergoing a transformation process, we believe it is crucial to motivate and retain qualified and dedicated employees within the Company. We are convinced that continuous training of our employees is key to their professional and personal development and a strong performance culture in the Group. To support our employees with today's professional tasks and prepare them for future challenges, for example through digitalization, ProSiebenSat.1 Group invested a total of EUR 2.4 million in education and training programs in the reporting period (previous year: EUR 4.5 million). The decrease was mainly due to the effects of the COVID-19 pandemic. Some of these investments were attributable to the courses offered by the P7S1 Academy, which offers the Group companies and their employees technical and personal training.

Due to the restrictions on contact during the COVID-19 pandemic, the majority of classroom training sessions could not be held as originally planned in the reporting period. The P7S1 Academy therefore increased its investment in the digitalization of its training offers and we plan to continue and expand this further in 2021. In addition, our employees can access many digital training offers on the LinkedIn Learning platform. We have also strengthened the Company's internal knowledge management with learning content produced in-house on Company-specific topics and launched an associated initiative at the P7S1 Academy. Moreover, we give employees the opportunity for further training with offers such as job rotation, job shadowing, and mentoring programs.

Our managers' skills are very important for our success. We want to use our manager development programs to strengthen the performance and development of managers at all levels. This includes mandatory training for new managers and seminars for managing directors. The virtual working world also poses new challenges for our managers in particular. To increase mutual dialog and make it easier to share best practices, we therefore launched a leadership community in the reporting period. We also dispose of an internal network for female managers ("LeadingWomen@P7S1").

We also aim to contribute to an attractive work environment with our work-life balance initiatives. This also includes the possibility of part-time work. The corresponding rate in the Group (not including international assets in the Red Arrow Studios segment except Studio71) came to 18.7% in 2020 (previous year: 18.8%). In Germany it was 18.4% after 18.5% in the previous year, while for ProSiebenSat.1 Media SE it increased to 20.3% (previous year: 18.4%). At the same time, we offer our staff many social benefits, sports programs and healthy meals in the campus canteens. A work-life training series, family-focused services and our in-house daycare center complete the offer, although they could only be used to a limited extent in the reporting period due to the COVID-19 pandemic.

The turnover rate in the Group (not including international assets in the Red Arrow Studios segment except Studio71) decreased to 13.6% in the reporting period (previous year: 15.6%). In Germany it was 13.2% after 14.9% in the previous year, while for ProSiebenSat.1 Media SE it came to 18.6% (previous year: 17.7%). For the calculation of the turnover rate, the number of former employees who left in the reporting period is divided by the number of employees as of December 31. Reasons for leaving are cancellations or termination agreements. Departures due to fixed-term contracts, the end of an apprenticeship, retirement or death are not taken into account. **GRI 401-1**

## OVERVIEW OF KEY EMPLOYEE FIGURES

### EMPLOYEES BY EMPLOYMENT CONTRACT, GENDER, AND REGION Employee headcount as of December 31, 2020 GRI 102-8

	Temporary		Permanent	
	2020	2019	2020	2019
<b>Gender</b>				
Women	624	703	2,839	2,716
Men	403	566	3,292	2,965
	<b>1,027</b>	<b>1,269</b>	<b>6,131</b>	<b>5,681</b>
<b>Region</b>				
Germany	1,008	1,245	5,065	4,803
Austria/Switzerland	15	24	531	505
US	3	0	360	219
UK	0	0	43	33
Other	1	0	133	121
	<b>1,027</b>	<b>1,269</b>	<b>6,132</b>	<b>5,681</b>

Not including international assets in the Red Arrow Studios segment (except Studio71).

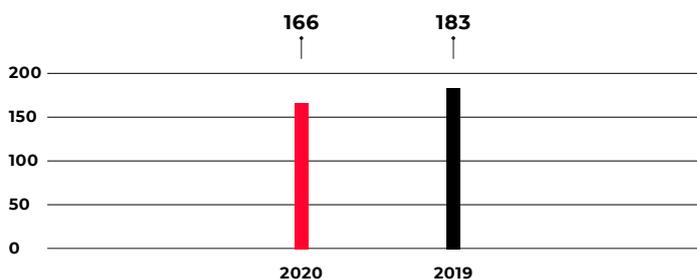
### NEW EMPLOYEE HIRES BY AGE GROUP, GENDER, AND REGION Employee headcount GRI 401-1

	New hires		New hire rate <sup>1</sup>	
	2020	2019	2020	2019
<b>Age group</b>				
<30 years	715	907	43.6%	53.9%
30–50 years	869	1,151	18.1%	25.0%
>50 years	66	71	9.3%	10.8%
	<b>1,650</b>	<b>2,129</b>	<b>23.0%</b>	<b>30.6%</b>
<b>Gender</b>				
Women	835	1,105	24.1%	32.3%
Men	815	1,024	22.1%	29.0%
	<b>1,650</b>	<b>2,129</b>	<b>23.0%</b>	<b>30.6%</b>
<b>Region</b>				
Germany	1,493	1,853	24.6%	30.6%
Austria/Switzerland	71	84	13.0%	15.9%
US	33	145	9.1%	66.2%
UK	24	16	55.8%	48.5%
Other	29	31	21.6%	25.6%
	<b>1,650</b>	<b>2,129</b>	<b>23.0%</b>	<b>30.6%</b>

<sup>1</sup> Proportion of new employees by headcount.

Not including international assets in the Red Arrow Studios segment (except Studio71).

## NUMBER OF YOUNG TALENTS



Journalistic traineeships, trainee programs, Chamber of Industry and Commerce apprenticeships and dual courses of study. Group companies primarily at the headquarters in Unterfoehring.

## TRAINING SESSIONS AT P7S1 ACADEMY

	2020	2019
Training sessions	223	492
Thereof manager trainings	15	58
Participants	2,871	5,849
Thereof manager trainings	96	371

Not including international assets in the Red Arrow Studios segment (except Studio71).

## HOURS OF TRAINING FOR EMPLOYEES

Employee headcount, average number of hours GRI 404-1

	2020	2019
<b>Gender</b>		
Women	4.5	8.6
Men	2.9	6.4
	<b>3.7</b>	<b>7.5</b>
<b>Management level</b>		
Top management	0.0	0.1
Senior management	2.2	2.6
Middle management	3.5	6.2
Team lead	4.2	9.9
No management level	3.7	7.3
	<b>3.7</b>	<b>7.5</b>
<b>Area</b>		
Production	3.1	4.7
Administration	3.7	10.2
Sales	5.4	11.9
	<b>3.7</b>	<b>7.5</b>

Group companies primarily at the headquarters in Unterfoehring.

## EMPLOYEES IN FULL-TIME AND PART-TIME EMPLOYMENT BY GENDER

Employee headcount as of December 31, 2020 **GRI 102-8**

	2020			2019		
	Part-time	Full-time	Total	Part-time	Full-time	Total
Women	924	2,600	3,524	868	2,551	3,419
Men	426	3,209	3,635	407	3,124	3,531
	<b>1,350</b>	<b>5,809</b>	<b>7,159</b>	<b>1,275</b>	<b>5,675</b>	<b>6,950</b>

Not including international assets in the Red Arrow Studios segment (except Studio71).

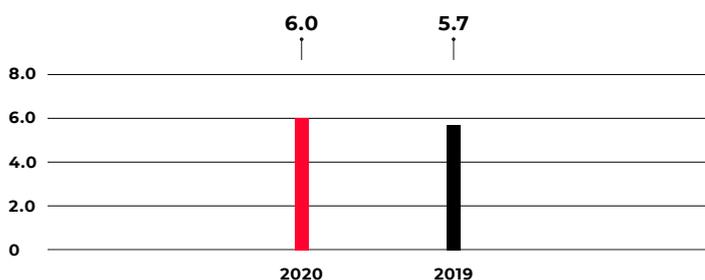
## EMPLOYEE TURNOVER BY AGE GROUP, GENDER, AND REGION Employee headcount, in % **GRI 401-1**

	Turnover rate	
	2020	2019
<b>Age group</b>		
<30 years	17.6	18.5
30–50 years	13.0	14.7
>50 years	8.8	14.0
	<b>13.6</b>	<b>15.6</b>
<b>Gender</b>		
Women	13.0	15.2
Men	14.2	15.9
	<b>13.6</b>	<b>15.6</b>
<b>Region</b>		
Germany	13.2	14.9
Austria/Switzerland	9.0	14.0
US	26.7	38.4
UK	32.6	18.2
Other	11.9	11.6
	<b>13.6</b>	<b>15.6</b>

Not including international assets in the Red Arrow Studios segment (except Studio71).

## AVERAGE DURATION OF EMPLOYMENT

In years



Not including international assets in the Red Arrow Studios segment (except Studio71).

## Occupational health and safety

The health and safety of employees are a high priority for ProSiebenSat.1. In February, a dedicated crisis team was formed in the form of the “COVID-19 Taskforce,” which is working with Group Safety, Occupational Health and Safety and the works council to implement the SARS-CoV-2 Occupational Health and Safety Standard. Against the backdrop of the COVID-19 crisis, a majority of employees at the Unterfoehring site have been working from home on a mobile basis since mid-March. In addition to the employees absolutely necessary to maintain broadcasting operations, since the beginning of September the employees who have been working exclusively out of the office since March, have partly returned to Unterfoehring on a regular basis. With rising infection figures, the Group again strengthened its out-of-office arrangements in October. At the time this report was completed, the majority of employees is working from home on a mobile basis. We have made work processes as flexible as possible and, where necessary, also sought individual solutions for employees. In addition, a works agreement was concluded for the protection of employees and the maintenance of operations during the pandemic.

The majority of the Group’s employees do not work in a traditional production environment. They are therefore only exposed to risks related to their occupation to a minor degree. However, we are aware of other potential health risks that could arise from work-related stress or a lack of physical activity, for example. We therefore bundle numerous service offerings relating to occupational health management in our work-life program. We also offer flexible working hours, out-of-office work and the option to take a sabbatical. Through operational integration management, we ensure that sick employees overcome their incapacity to work, that their repeated incapacity is avoided, and that their job is retained. **GRI 403-3**

## SOCIETY

### Social responsibility

We can reach millions of viewers and users every day with our TV and digital offerings on all platforms. In 2020, ProSiebenSat.1 Group reached over 60 million people a month with its TV stations in its core market of Germany and achieved a combined audience share among 14- to 49-year-olds of 27.2% (previous year: 28.2%). At the end of 2020, the digital offerings managed by ProSiebenSat.1's marketer Seven.One Media also had a monthly reach of around 33 million unique users in the German market (previous year: 36 million). In addition, ProSiebenSat.1 Group's global digital studio Studio71 generated 10.9 billion video views a month with its web channels in 2020 (previous year: 9.9 billion). For a detailed description of the development of ProSiebenSat.1 Group's relevant market environments with corresponding reach figures and information on the sources, please refer to the section "Group Environment" of ProSiebenSat.1 Group's Management Report.

As a media company, we are aware of the increased attention and pursue the goal of using this reach responsibly. In addition to entertainment shows in its program, ProSiebenSat.1 therefore also aims to call public attention to socially relevant aspects with its own formats, issue films, and campaigns. The term "public value" is key here. This is generally understood to refer to the value and benefits that an organization brings for society. In the program principles of the German Interstate Media Agreement, it is already stipulated that private-sector broadcasters should express the diversity of opinions in their content and allow important political, ideological, and social players to have a say in an appropriate way. It is partly in this context that we have integrated shaping opinions and promoting democracy in the principles for our commitment to sustainability, within the action area of social responsibility. As a media company, we want to incorporate our sustainability goals in an even better way in our programming with our TV channels and in the influencer marketing of digital studio Studio71. We therefore want to focus increasingly on socio-politically relevant issues in terms of media and content and address these issues with the young target group. In particular, the Corporate Sustainability Office is committed to the expansion within the Group through the communication of the sustainability strategy and regular exchanges with station and program managers.

For example, Thilo Mischke took a look behind the facade of the right and the far-right scene in Germany in the documentary "Rechts.Deutsch.Radikal.", aired in September 2020 after 18 months of research. The investigative documentary achieved a 15.0% market share in the target group of 14- to 49-year-olds in prime time and without ad breaks, and was also the number 1 German Twitter trend while it was being broadcast. At the same time, the "ProSieben Spezial" formed the starting point for a nationwide debate about right-wing extremism. Another example of sociopolitically relevant content on ProSiebenSat.1 Group's stations was the 15-minute format "Joko und Klaas LIVE – A Short Story of Moria" about the situation for refugees on Lesbos, which drew around 1.43 million viewers in the target

group of 14- to 49-year olds. In December 2020, the Group also announced that it would produce cross-platform news for ProSieben, SAT.1, and Kabel Eins itself again. To this end, a central news team with around 60 employees is being set up.

For further information on journalistic due diligence and the independence of editorial work, please refer to the "Governance and compliance" section.

Since 2011, the Group has placed its public value activities in a larger social context and underscored their relevance for the Group by establishing an Advisory Board. The interdisciplinary body chaired by Bavaria's former minister-president Dr. Edmund Stoiber advises ProSiebenSat.1 Group on relevant social, ethical and media-policy issues and provides impetus on important topics such as education and culture. In 2020 the Advisory Board held four meetings, with the head of the Corporate Sustainability Office reporting on ProSiebenSat.1 Group's sustainability strategy at two meetings.

Detailed information on the program highlights with socio-political relevance and other examples of how ProSiebenSat.1 Group fulfills its social responsibility can be found in the "Taking responsibility" chapter of the Annual Report 2020.

### Anti-discrimination

Discrimination refers to unequal treatment of individuals or groups of people on the basis of certain characteristics. The prohibition of discrimination is defined as a human right and forms the basis for respectful interaction. We believe that at companies in particular it is very important to ensure equal treatment of all employees. ProSiebenSat.1 Group therefore does not tolerate discrimination on the basis of age, disability, ethnic background and nationality, sex and gender identity, religion and ideology, or sexual orientation and identity. We provide the workforce throughout Germany with mandatory training on the General Act on Equal Treatment (AGG). With our Code of Conduct, we also take a clear stand against any type of sexual violence or abuse of power.

All employees are encouraged to report discrimination or violations of other principles set out in the Code of Conduct. One central tool is the whistleblower system, with the associated communication on ProSiebenSat.1's intranet specifically focusing on discrimination alongside other violations of regulations and laws. In addition to internal reporting channels, it is also possible to report violations anonymously via an external Ombuds Office. This accepts reports by telephone or e-mail, checks their plausibility, and then forwards them to the Group Compliance division. In the event of reports of serious suspected cases that turn out to be justified after internal evaluation, the Chief Compliance Officer promptly informs the management. Via the private media association VAUNET, we also participate in the Themis advice center against sexual harassment and violence, which provides assistance for those affected in the film, television and theater industry. In 2020, there was one case (previous year: four) of violations in connection with discrimination, which was closed in the reporting period. **GRI 406-1**

## DIVERSITY

### Diversity management

For us, diversity means recognizing and valuing differences and individuality. Our goal 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 background and nationality, sex and gender identity, religion and ideology, or sexual orientation and identity. Only if all employees can freely develop their talents and feel motivated to live up to their potential will this give rise to a wide variety of ideas and thus sustainable success. Against this backdrop, ProSiebenSat.1 Group signed the Diversity Charter in 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 aim to promote diversity within our workforce and champion equal rights and equal opportunities in accordance with the guiding principle for the action area of diversity. The HR department and the Corporate Sustainability Office in particular are responsible for the further development of diversity management, the more targeted focus, and the operational implementation of associated measures. This also includes improving the inclusivity concept, for example with the planned conclusion of an inclusivity agreement between the Group management, the works council, and the representative body for disabled employees.

Diversity is aided in particular by the best possible balance ratio of men and women in the workforce and in management positions. In 2020, 49.2% (previous year: 49.4%) of employees in the Group were female. The proportion of female managers increased from 34.8% to 35.4% in the reporting period. When filling management positions in the Group, know-how and personal aptitude should be equally important for men and women. In addition, we have integrated “gender equality” into ProSiebenSat.1 Group’s sustainability strategy as a United Nations Sustainable Development Goal (SDG) that is particularly relevant to us. The internal and external communication of this goal sends a clear signal both to potential managers and to decision-makers at all management levels in the selection process. **GRI 405-1**

### SHARE OF MEN AND WOMEN

Employee headcount (annual average), in %

	Employees		Managers	
	2020	2019	2020	2019
<b>Group</b>				
Women	49.2	49.4	35.4	34.8
Men	50.8	50.6	64.6	65.2
	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Germany</b>				
Women	49.4	49.6	34.7	33.9
Men	50.6	50.4	65.3	66.1
	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>ProSiebenSat.1 Media SE</b>				
Women	60.6	62.5	34.2	39.0
Men	39.4	37.5	65.8	61.0
	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Not including international assets in the Red Arrow Studios segment (except Studio71).

An open-minded working climate with regard to sexual orientation and gender identity is a key criteria for us to be perceived as a modern employer. That is why we specifically support initiatives aimed at promoting diversity and inclusivity. The LGBTIQ network PROUD@ProSiebenSat.1, founded by employees in 2020, has set itself the goal of making diversity more visible within the Group. In addition to weekly project meetings and a series of internal events, the network has also launched the interview series “Queer at Work,” which is published both internally and externally on the ProSiebenSat.1 careers blog.

Since 2019, there has also been a “Diversity Day” training session as part of the training program for journalistic trainees in order to raise awareness of the different aspects of diversity among our junior staff in the editorial teams. This includes diversity among employees as well as in TV programming. In the reporting period, our journalistic trainees therefore completed training with the MaLisa Foundation on audiovisual diversity as part of their theoretical training block. In this context, ProSiebenSat.1 supported the follow-up study by the MaLisa Foundation and the University of Rostock on gender representation in film and TV in Germany in 2020. The results will be published in 2021.

ProSiebenSat.1 Group also makes use of its reach and wants to set an example for diversity with its TV stations and digital services. With the campaign #ranGEGENrassismus in 2020, ran called on all American football, soccer, motor sports and other sports fans to speak up for respectful interaction and against discrimination of any kind. ProSieben also sent a signal on tolerance and a diverse society in the reporting period, supporting Christopher Street Day (Gay Pride) – which could only be held virtually for the first time due to the COVID-19 pandemic – in cooperation with Instagram.

## OVERVIEW OF KEY DIVERSITY FIGURES

### DIVERSITY OF EMPLOYEES

As of December 31, 2020 (headcount), in % GRI 405-1

		2020	2019
Top management <sup>1</sup>	Women	0	29
	Men	100	71
Senior management	Women	17	17
	Men	83	83
Middle management	Women	26	27
	Men	74	73
Team lead	Women	36	36
	Men	64	64
No management level	Women	54	54
	Men	46	46
Top management	<30 years	0	0
	30–50 years	50	57
	>50 years	50	43
Senior management	<30 years	0	0
	30–50 years	52	61
	>50 years	48	39
Middle management	<30 years	1	0
	30–50 years	66	72
	>50 years	33	28
Team lead	<30 years	2	3
	30–50 years	83	83
	>50 years	15	14
No management level	<30 years	21	22
	30–50 years	66	66
	>50 years	13	12
Production	Women	44	44
	Men	56	56
Administration	Women	57	59
	Men	43	41
Sales	Women	55	54
	Men	45	46
Production	<30 years	18	19
	30–50 years	65	66
	>50 years	17	15
Administration	<30 years	16	17
	30–50 years	71	72
	>50 years	13	11
Sales	<30 years	17	17
	30–50 years	71	71
	>50 years	12	12

<sup>1</sup> All female managers included in top management in 2019 have moved to Executive positions in 2020. Group companies primarily at the headquarters in Unterfoehring.

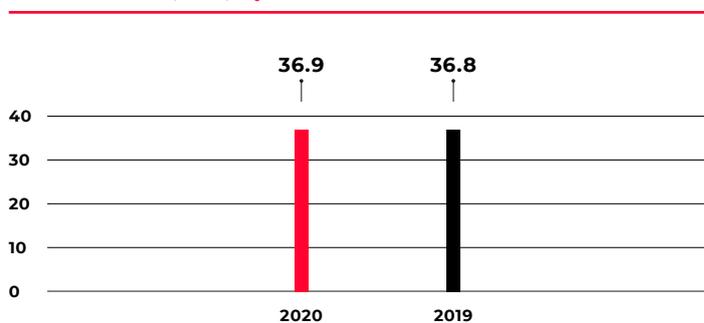
### DIVERSITY OF GOVERNANCE BODIES AT PROSIEBENSAT.1 MEDIA SE

As of December 31, 2020 (headcount), in % GRI 405-1

	Executive Board		Supervisory Board	
	2020	2019	2020	2019
<b>Gender</b>				
Women	33	0	33	33
Men	67	100	67	67
	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>
<b>Age group</b>				
<30 years	0	0	0	0
30–50 years	0	33	33	33
>50 years	100	67	67	67
	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

### AVERAGE AGE OF EMPLOYEES

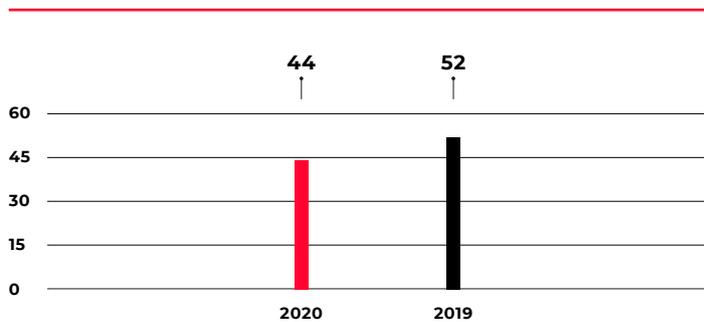
As of December 31, 2020, in years



Not including international assets in the Red Arrow Studios segment (except Studio71).

### NUMBER OF NATIONALITIES OF EMPLOYEES

As of December 31, 2020 (headcount)



Group companies primarily at the headquarters in Unterfoehring.

## Accessible offerings

ProSiebenSat.1 Group is committed to barrier-free access to its offerings. For this reason, we offer subtitled programming areas and audio descriptions for deaf and hard of hearing people on our channels, among others, in order to improve the dissemination of information. Back in 2000, ProSieben introduced the first regular subtitle service for the deaf on private television. Accessible content is broadcast on nearly all of the Group's stations, with the amount steadily increasing. For example, in 2020 the Superbowl, documentaries such as "Rechts.Deutsch.Radikal." or "Diagnose Trump", and entertainment formats such as "The Fame Maker" and "Pretty in Plüsch" were broadcasted with subtitles. In addition, the range of shows with live audio description was expanded in 2020. We will endeavor to increase our accessible offerings in the future, too.

Moreover, the new German Interstate Media Treaty of broadcasters of nationwide programs also promotes the expansion of accessible offerings within the limits of technical and financial possibility. Individual states and the German government have published action plans to implement the UN Convention on the Rights of Persons with Disabilities, which also aim to include more accessible formats on television. The state media authorities regularly monitor this expansion. Subtitles are currently included in the programming on five German ProSiebenSat.1 stations: SAT.1, ProSieben, Kabel Eins, sixx, and ProSieben MAXX. In the current reference period on which the state media authorities' monitoring is based, the number of subtitled shows and the broadcast time were once again increased significantly. The number of subtitled shows within the broadcasting group increased by 29% (September to December 2020: 4,452 shows; previous year: 3,458). The corresponding broadcast time in 2020 went up by 33%.

## ENVIRONMENT

Although ProSiebenSat.1 Group as a media group does not operate in an industrial sector with high resource consumption and energy intensity, we are aware of our ecological responsibility. Working with our employees and in dialog with our external stakeholders, we want to contribute to mitigating climate change and protecting our environment, for example through the careful and efficient use of natural resources and by reducing our energy consumption and CO<sub>2</sub> emissions. However, we consider the environmental impact of our business activities to be limited and have therefore not identified environmental matters as a key non-financial aspect in accordance with section 289c (3) HGB.

In connection with the publication of the Sustainability Report 2019, we announced in June 2020 that we intend to reduce ProSiebenSat.1 Group's operating CO<sub>2</sub> emissions to zero by 2030, thus becoming climate-neutral. We are aiming to achieve this goal primarily by means of lower energy consumption and purchasing electricity from renewable energy sources. Furthermore, we have identified potential CO<sub>2</sub> savings in areas such as "green productions", business trips, and employee mobility. To this end, CO<sub>2</sub> offsetting with climate protection projects is also planned. The Corporate Sustainability Office works closely with the departments and in close consultation with the Executive

Board on the further development of the climate strategy and the implementation of specific measures.

In this context, the Group adjusted its travel policy in the reporting period. Among other changes, this included standardizing the rules for employees and management, introducing restrictions on flights, and expanding rail travel as an environmentally friendly alternative. In addition, we have been partly offsetting emissions from business trips by airplane since 2020. At the locations Unterfoehring and Berlin, we supply our office buildings, production studios, and computer centers exclusively with green electricity. ProSiebenSat.1 has successively expanded the environmentally friendly heating supply and has switched entirely to geothermal energy for the buildings at the headquarters. We also use the waste heat from our computer centers to heat our office buildings. The gradual conversion to LED lighting also contributes to increasing energy efficiency. In addition, the measures for waste separation and reduction are being optimized on an ongoing basis. For example, the canteens on the ProSiebenSat.1 campus have already completely eliminated single-use plastics. In addition, sustainability certification in accordance with the LEED model (Leadership in Energy and Environmental Design) is planned for the new campus in Unterfoehring, which is currently under construction.

As a media company, ProSiebenSat.1 also wants to live up to its environmental responsibilities in production, and on the basis of this sense of identity it developed the "Sauber gedreht!" initiative in 2019. The first result was a catalogue with four action areas comprising measures for TV productions that range from reducing CO<sub>2</sub> emissions to protecting natural resources to avoiding environmentally harmful substances, as well as reduced use of plastic and a general reduction in waste. In 2020, the package of measures was sent to producers as part of a pilot phase. The growing importance of green productions is also underscored by the "Joint industry declaration for sustainability in film and series production," in which ProSiebenSat.1 was among the signatories in February 2020. In its annual "Green Seven Week", ProSieben uses its reach to raise awareness of environmental sustainability among young viewers in particular. The "Green Seven Week" was held for the twelfth time in September 2020 and drew attention to the global consequences of forest fires and forest dieback with the motto "Our forest is burning!"

Operational responsibility for recording and consolidating environmental activity data lies with the Corporate Procurement & Real Estate department for the headquarters and with the respective management teams for the ProSiebenSat.1 investments. The Corporate Communications and Corporate Sustainability central functions are responsible for CO<sub>2</sub> accounting, determining other reported environmental performance indicators, and reporting and communicating these.

## Energy

ProSiebenSat.1's energy consumption mainly involves the purchase of electricity and heating. The total energy consumption (incl. electricity) within the Group fell to approximately 37 GWh in the reporting period (previous year: approximately 41 GWh), primarily due to lower electricity consumption and significantly restricted employee mobility as a result of the COVID-19 pandemic. The material energy consumption outside the Group is indicated indirectly in the carbon footprint through the Scope 3 emissions. The total consumption of electricity at the headquarters in Unterfoehring was around 15 GWh in 2020, representing a slight decrease as against the previous year (16 GWh). For the generation of heat, environmentally friendly geothermal energy was largely used rather than fuel oil or natural gas. In total, ProSiebenSat.1's energy consumption for heating and cooling in Unterfoehring amounted to around 7 GWh, as in the previous year. In 2020, the energy consumption of company cars in Germany was 4.7 GWh (previous year: 6.2 GWh), a decline of around 25 percent compared to the previous year. **GRI 302-1, GRI 302-2**

### ENERGY INTENSITY GRI 302-3

	2020	2019	2018
Energy consumption in GWh	36.67	40.72	44.64
Revenues in EUR m	4,047	4,135	4,009
Average FTEs	7,128	7,265	6,239
<b>Energy consumption/revenues</b> in MWh/EUR m	<b>9.06</b>	<b>9.85</b>	<b>11.13</b>
<b>Energy consumption/average FTE</b> in MWh/average FTE	<b>5.14</b>	<b>5.60</b>	<b>7.15</b>

## Emissions

We have been recording the Group's greenhouse gas emissions since 2015 and are continually working to improve the data quality of our carbon footprint and to ensure that the measurement data has the highest possible coverage rate. Our carbon footprint includes direct greenhouse gas emissions (Scope 1), indirect greenhouse gas emissions (Scope 2) and greenhouse gas emissions from upstream and downstream stages in the value chain (Scope 3). The coverage with measurement data is at least 78% for Scope 1 (previous year: 78%) and 79% for Scope 2 (previous year: 75%). Detailed information on the reporting of greenhouse gas emissions can be found in the → [„Explanatory notes on the Carbon Footprint“](#).

In 2020, as in the previous year, ProSiebenSat.1 Group's direct emissions resulted almost entirely from ProSiebenSat.1's vehicle fleet. The substantial decrease was due to reduced mobility as a result of the restrictions arising from the COVID-19 pandemic. Scope 2 emissions also decreased year-on-year, albeit less significantly. At around 44%, commuting by employees is responsible for the majority of the reported greenhouse gas emissions from upstream and downstream stages in the value chain. Overall, the reduction in Scope 3 emissions – and thus also in total emissions – is mainly due to reduced employee mobility as a direct impact of the COVID-19 pandemic.

### CARBON FOOTPRINT OF PROSIEBENSAT.1 GROUP GRI 305-1, GRI 305-2, GRI 305-3

Greenhouse gas emissions (CO <sub>2</sub> equivalent) in metric tons <sup>1</sup>	2020	Change	2019	Change	2018	2017	2016
<b>Scope 1 – Direct greenhouse gas emissions</b>	<b>1,599</b>	<b>-24%</b>	<b>2,110</b>	<b>10%</b>	<b>1,910</b>	<b>2,456</b>	<b>2,371</b>
– Vehicle fleet <sup>2</sup>	1,560	-24%	2,064	19%	1,736		
– Fuel oil	40	-13%	46	-21%	58		
– Gas	–	–	–	–	116		
<b>Scope 2 – Indirect greenhouse gas emissions<sup>3</sup></b>	<b>2,188</b>	<b>-24%</b>	<b>2,882</b>	<b>-72%</b>	<b>10,460</b>	<b>4,035</b>	<b>3,471</b>
– Electricity <sup>4</sup>	1,054	-9%	1,163	-87%	8,662		
– District heating and geothermal energy <sup>5</sup>	1,134	-34%	1,719	-4%	1,798		
<b>Scope 3 – Greenhouse gas emissions from upstream and downstream stages of the value chain</b>	<b>5,797</b>	<b>-64%</b>	<b>16,292</b>	<b>-21%</b>	<b>20,605</b>	<b>17,356</b>	<b>15,130</b>
– Fuels and energy-related activities not included in Scope 1 or 2	1,898 <sup>6</sup>	-4%	1,974	-17%	2,385		
– Waste from operating processes	23	-50%	47	-18%	57		
– Employee commuting	2,529	-61%	6,474	-33%	9,659		
– Business travel (plane, train, rental car and taxi)	1,347 <sup>7</sup>	-83%	7,797	-8%	8,504		
<b>Total emissions from Scope 1, 2 and 3<sup>8</sup></b>	<b>9,584<sup>9</sup></b>	<b>-55%</b>	<b>21,284</b>	<b>-35%</b>	<b>32,975</b>	<b>23,847</b>	<b>20,973</b>

<sup>1</sup> When calculating the carbon footprint, we were guided by the criteria and definitions of the Sustainability Reporting Guidelines (Standards) of the Global Reporting Initiative (GRI). The data was collected on the basis of internal guidelines. In addition, we aligned the calculation of our carbon footprint and selected data on indirect CO<sub>2</sub> emissions (Scope 3) to the following standards: the Greenhouse Gas (GHG) Protocol – Corporate Accounting and Reporting Standard, the Corporate Value Chain Accounting and Reporting Protocol of the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD). All of ProSiebenSat.1 Group's own sites and employees were included in the carbon footprint. The market-based method was used for the calculation.

<sup>2</sup> Without hybrid and electric vehicles.

<sup>3</sup> Energy consumption by the production studios and computer centers outside of the Unterfoehring and Berlin sites is not included. Scope 2 emissions according to the location-based method amounted to 9,577 metric tons of CO<sub>2</sub>e in the reporting period (previous year: 10,557t CO<sub>2</sub>e).

<sup>4</sup> Location-based emissions in the category electricity amounted to 7,401 metric tons of CO<sub>2</sub>e in the reporting period (previous year: 8,340 metric tons of CO<sub>2</sub>e).

<sup>5</sup> Location-based emissions in the category of district heating and geothermal energy amounted to 2,176 metric tons of CO<sub>2</sub>e in the reporting period (previous year: 2,217 metric tons of CO<sub>2</sub>e).

<sup>6</sup> Due to adjustments in the calculation methodology, a comparison with the previous year's development is only possible to a limited extent.

<sup>7</sup> In the category business travel 355 metric tons of CO<sub>2</sub>e were compensated.

<sup>8</sup> Total emissions according to the location-based method amounted to 16,973 metric tons of CO<sub>2</sub>e in the reporting period (previous year: 28,959 metric tons of CO<sub>2</sub>e).

<sup>9</sup> The amount of remaining non-reduced and non-compensated emissions was 9,229 metric tons of CO<sub>2</sub>e.

**GHG EMISSIONS INTENSITY GRI 305-4**

	2020	2019	2018
GHG emissions in metric tons	9,584	21,284	32,975
Revenues in EUR m	4,047	4,135	4,009
Average FTEs	7,128	7,265	6,239
<b>GHG emissions/revenues</b> in metric tons/EUR m	<b>2.37</b>	<b>5.15</b>	<b>8.23</b>
<b>GHG emissions/average FTE</b> in metric tons/average FTE	<b>1.34</b>	<b>2.93</b>	<b>5.29</b>

**Waste**

Waste generated at the Unterfoehring site in 2020 decreased significantly to 615 metric tons (previous year: 4,028 metric tons). In the waste balance, 188 metric tons (previous year: 3,228 metric tons) were directly attributable to demolition work in connection with the “New Campus” construction project. Any waste that cannot be reclaimed is disposed of in an environmentally responsible manner. When doing so, ProSiebenSat.1 complies with the local regulations and classifies waste as hazardous or non-hazardous in accordance with the relevant national legislation. The volume of hazardous waste (e.g. insulating material and construction materials containing asbestos) fell from 46 to 29 metric tons in 2020 on account of the construction progress. Municipal waste (domestic-type waste produced by trade and industry) decreased due to out-of-office-regulations in the wake of the COVID-19 pandemic to 69 metric tons (previous year: 122 metric tons). **GRI 306-2**

**GOVERNANCE & COMPLIANCE**

The Executive Board and Supervisory Board regard good corporate governance as an essential component of responsible, transparent management geared toward long-term value creation. Further information can be found in particular in the Management Declaration in accordance with sections 289f and 315d of the German Commercial Code (HGB). In addition

to the annual Declaration of Compliance pursuant to section 161 of the German Stock Corporation Act (AktG), this includes other relevant information on ProSiebenSat.1 Group's corporate governance practices.

The Executive Board of ProSiebenSat.1 Media SE is also convinced that sustainable economic success in a competitive environment can be achieved only by ensuring that business practices comply with the applicable laws. In addition to preventing corruption, the Company particularly focuses on anti-trust legislation and media law, as well as legal provisions on data protection. ProSiebenSat.1 Group has implemented a compliance management system (CMS) to monitor compliance with the law. The main objective of the CMS is to ensure that all employees always think and act with integrity and in accordance with the guidelines and regulations, and thus to prevent law- and rule-breaking. The central compliance organization is made up of the Compliance Committee and the Group Compliance department headed by the Chief Compliance Officer (CCO), which are assisted in the performance of their duties by experts from other areas, such as the Legal department. In addition, Unit Compliance Officers (UCOs) have been appointed who are responsible for the CMS at Group entities and are in direct contact with the respective subject experts. The CCO 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 risks.

ProSiebenSat.1 Group has laid down basic guidelines and policies in its 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. They serve all members of the Executive Board, the management, and the employees of ProSiebenSat.1 Group as a binding reference and regulatory framework for dealing both with each other and with business partners, customers, suppliers, and other third parties. Another central compliance instrument for ProSiebenSat.1 Group is the whistleblower system. In addition to internal reporting channels, it is also possible to report legal violations anonymously via an external Ombuds Office.

**COMPLIANCE TRAINING**

Topic	2020			2019		
	Classroom trainings (live)	Participants (live)	Online trainings	Classroom trainings (live)	Participants (live)	Online trainings
Media, copyright, advertising law, German Unfair Competition Act	1	3	3,448	9	247	4,235
Compliance Antitrust law	7	295	—	13	250	—
General Act on Equal Treatment (AGG), labour law	—	—	2,338	—	—	2,469
Data protection	—	—	2,304	6	77	2,621
Information Security	—	—	6,500	6	146	2,205
Youth protection	2	26	477	6	84	536
Occupational health and safety	—	—	6,213	4	171	5,820
Tax law	2	42	—	9	79	—
Management seminars	2	18	—	3	22	—

In the financial year 2020, some classroom training sessions were held virtually instead.

Further information, particularly on the compliance organization and the whistleblower system, is provided in the Management Declaration in accordance with sections 289f and 315d HGB.

In addition, ProSiebenSat.1 Group has implemented a compliance training program that includes both online and classroom training. The online training, which is offered in English and German on a two- to three-year cycle and is mandatory for all employees, is intended to provide a basic understanding of the main compliance risks. The classroom training is targeted at “risk groups” and is carried out by Legal Affairs, Group Compliance, HR Law, Taxes, Corporate Information Security, the Data Protection Officer and the Youth Protection Officers for their individual areas. In addition, ProSiebenSat.1 Group offers seminars for the managers of German affiliated companies at its P7S1 Academy in order to give them a comprehensive overview of their rights and obligations as well as the relevant legal bases.

### Anti-corruption and antitrust law

Legally compliant conduct and the prevention of violations of laws and regulations are a prerequisite for a company’s sustainable success. Therefore, preventing corruption and anti-competitive behavior in connection with antitrust law is highly relevant to business and represents an important success factor for achieving our corporate goals. Free competition is a key pillar of our economic system and is given special protection by antitrust laws. Violations of competition laws may result in high fines and claims for damages that may affect not only the company but also employees personally. The corresponding Group-wide guidelines on avoiding corruption and on competitive conduct were revised in 2020. In 2020, as in the previous year, we were not aware of any investigations against the Group, its subsidiaries or employees of ProSiebenSat.1 Group with regard to corruption offenses or antitrust violations.

**GRI 205-3, GRI 206-1**

### Product governance

We see product governance, with its central components of data protection provisions and media regulation, not only as a legal requirement but also as an important competitive factor with a lasting impact on trust in ProSiebenSat.1 Group’s products, offerings and brands and thus also on the economic success of the Group. Data protection and media law provisions are thereby covered by the compliance management system (CMS).

### DATA PROTECTION

In the digital world, more and more personal data is being generated by new business models and processed in a wide variety of ways. This also applies to ProSiebenSat.1 Group with its wide variety of entertainment services and commerce companies in the portfolio. In this context, data protection protects the right to privacy and to information control, i.e. the right of each individual to control the disclosure and use of his or her own personal data. Our goal is to handle personal data carefully and protect it from misuse. The Group Data Protection Officer is responsible for cooperation and coordination on all major data protection matters. He is assigned to the Group Compliance

division in organizational terms and is supported by data protection law specialists when it comes to legal issues. By way of mandatory training and assessments by the Group Data Protection Officer, violations of privacy are to be prevented and compliance with data protection law ensured.

In doing so, we aim to ensure compliance with data protection on the basis of a risk-oriented data protection management system and to protect personal and other sensitive data from loss, destruction, unauthorized access or unauthorized use, processing, or disclosure. Specific measures are based on the legal regulations, particularly the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG), as well as our own data protection guidelines. The data protection law requirements form part of our CMS. ProSiebenSat.1 Group has implemented processes to protect personal data against misuse. These relate to the preparation of agreements under data protection law in order to meet the requirements of Articles 26 and 28 GDPR and to the disclosure of personal data to public authorities. The data protection processes also cover the information required to be provided, the rights of the data subject, and the reporting of data breaches, i.e. third parties unlawfully obtaining personal data, pursuant to Articles 33 and 34 GDPR.

In 2020, there were 18 cases (previous year: eight) of substantiated complaints regarding the violation of customers’ privacy at companies of ProSiebenSat.1 Group in Germany, of which 15 were from external parties and three from regulatory authorities. Furthermore, there were six cases (previous year: 12) of data leaks, data theft, or data loss that had to be reported in accordance with the General Data Protection Regulation (GDPR).

**GRI 418-1**

### MEDIA REGULATION

Among other aspects, the media law provisions of the CMS deal with journalistic independence, the principles of the separation of advertising and programming, and the requirements for the protection of young people. These issues also form part of the Code of Conduct. For 2020, we recorded a total of 12 violations (previous year: 11) of journalistic due diligence, program principles, and provisions for the protection of minors and personal rights. **GRI 416-2**

In all our activities, we are committed to a 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, they are essentially free to form their editorial content as they see fit and should report independently of social, economic or political interests. In addition, topics such as press law and

the protection of minors are trained and deepened in internal training courses.

ProSiebenSat.1 Group is committed to differentiating between editorial reporting and broadcasts for advertising purposes. In substantiated individual cases where the use of surreptitious advertising is suspected, an ad-hoc Supervisory committee can take action. In Germany, the Group is also committed to following the provisions of the German Interstate Broadcasting Agreement and the “Common Guidelines of the State Media Authorities for advertising, for ensuring separation of advertising and programming, and for sponsorship on television and radio,” or rather the provisions of the German Interstate Media Agreement that have replaced these since November 2020. The ProSiebenSat.1 Group guidelines on the separation of advertising and programming include specific explanations regarding bans on the placement of particular products and services on the basis of the German Interstate Broadcasting Agreement. They provide employees of the German companies of ProSiebenSat.1 Group with binding guidelines as part of their employment contract in order to prevent violations of program principles as far as possible. For the German stations, the guidelines serve the preservation of journalistic credibility and aim to safeguard the independence of the content from third-party influences as the top-level programming guidelines.

Provisions for the protection of young people are also covered by the CMS in the context of media regulation. A key role is played by the youth protection officers at ProSiebenSat.1 Group, who are tasked with making sure 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 Agreement on Youth Protection in the Media (JMStV) stipulates clear requirements for this. For example, providers must check their telemedia content for any aspects that could have a harmful effect on the development of children and young people. The youth protection officers are autonomous in their work and are responsible for ensuring that content that is unsuitable for children and young people is broadcasted only at the legally stipulated times. At the same time, they are expected to use technical means (e.g. PIN procedures) to ensure the protection of young people from the dissemination of content on the Group’s websites that could potentially harm their development. To this end, the youth protection officers are involved in the production and purchasing of programs at an early stage, if possible. Their tasks include assessing scripts in advance, supporting productions, and preparing expert reports on them. Independently from the work of the youth protection officers, TV and online editors receive regular training on youth protection regulations. As well as providing employee training and internal guidelines, we support the protection of young people via various organizations, such as the Voluntary Self-Regulation of Television Association (Freiwillige Selbstkontrolle Fernsehen, FSF) and the Voluntary Self-Monitoring of Multimedia Service Providers Association (Freiwillige Selbstkontrolle Multimedia-Diensteanbieter, FSM).