

# Corporate culture



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## Corporate Culture

### Corporate Responsibility at Bertelsmann

- We take responsibility – for our employees, for the quality of our media and services, and for the impact our business operations have on society and the environment.
- This is an integral part of Bertelsmann’s corporate culture.

### The Bertelsmann Code of Conduct

- Main objectives is to provide information and awareness within the company about legal risks, applicable laws and company guidelines.
- [Ethics & Compliance Website](#) for more information.

### The Bertelsmann Essentials

- Shared values and goals are the cornerstones of a corporate culture
- The Bertelsmann Essentials provide transparency and offer guidance for internal and external stakeholders

## OUR MISSION

Bertelsmann is an international media corporation. We provide information, entertainment and media services to inspire people's daily lives. We aspire to make a valuable contribution to society. We strive to be leaders in our markets and achieve returns on capital employed that guarantee growth and continuity of our corporation. Our joint efforts focus on creative content and customer relations. We seek to provide working conditions that are equitable and motivating for our employees. We commit ourselves to ensuring the continuity and ongoing progress of our corporation.

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## CORE VALUES

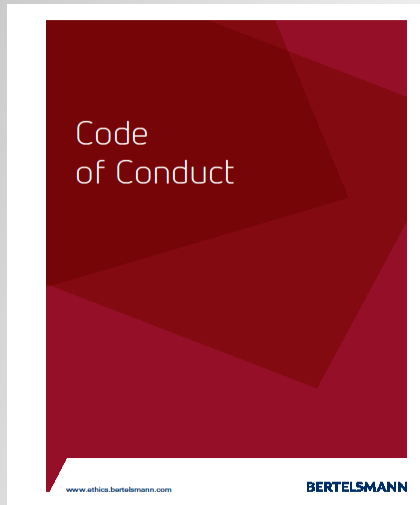
- Partnership
- Creativity
- Entrepreneurship
- Citizenship

### OUR COMMITMENT:

**We expect everyone at Bertelsmann to adhere to this mission and these core values.**

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## Code of Conduct



- ❖ Applies to all employees, directors, officers and representatives of our company.
- ❖ The guiding principle of our Code of Business Conduct is that our company and its employees must meet high ethical standards, and comply with all applicable laws, rules and regulations including those of the United States and all jurisdictions in which we do business.

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## Code of Conduct

- ❖ We ensure this by upholding all the cores values reflected in the Bertelsmann Essentials, including the provision on “Ethical Standards.” For purposes of business conduct, the following ethical standards, listed alphabetically, have special relevance:

***Fairness*** Acting in ways that do not provide inappropriate advantage or disadvantage to any party.

***Honesty*** Committing to openness and to being free of deception in all actions and communications.

***Integrity*** Adhering consistently to a set of standards and values that promote trust.

***Respect*** Recognizing each individual’s unique value and treating each person with courtesy, honesty and dignity.

***Responsibility*** Ensuring that each person is accountable for the outcome and consequences of his or her choices and actions.

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## Non-Harassment Policy

Harassment is: Verbal or physical conduct that disrespects or shows hostility toward an individual based on that person's:

- Race or color
- National origin or citizenship
- Religion
- Gender, marital status or sexual orientation
- Age
- Disability
- Or any other characteristic protected by law

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### *How Do I Raise Concerns?*

- Any Member of Management
- Human Resources
- The Ethics Line



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## *What is the Ethics Line?*

The phone and online versions of the EthicsLine are outsourced, anonymous and independent reporting services that provide you with an important option to voice ethics and compliance concerns 24 hours a day, every day without fear of retaliation.

A trained communications specialist employed by an expert outside organization will answer your call. The specialist will ask you questions, take notes and prepare a report. The report will be submitted to company representatives for further investigation. If you provide a name, a company representative might contact you.

If you choose to remain anonymous, the specialist will give you a case number and may request that you call the Ethics Line again to ask you more questions if necessary.

877-278-0303

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

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## Online Process

### What Happens If I Go Online to Report Concerns?

Going online is the same as calling the Ethics Line, except that you fill out the form yourself without having to speak to anyone.



Calls and online sessions are never recorded or traced. As outlined in the Code of Conduct, there will be no retaliation against any employee who reports an ethics or compliance concern in good faith.

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## Identification

### Do I Have to Give My Name When I Go Online or Call the EthicsLine?

You do not have to give your name.

However, we encourage you to do so if you are comfortable as it helps in the follow-up and investigation process.

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## What Should Be Reported?

### What Kinds of Concerns or Allegations Should I Report to the EthicsLine?

Employees who do not wish to report concerns or allegations to a company representative directly should go online or call the Ethics Line regarding:

- ❖ Fraud
- ❖ Theft
- ❖ Illegal Downloading
- ❖ Workplace Violence
- ❖ Health & Safety Violations
- ❖ Improper Gifts & Entertainment
- ❖ Discrimination
- ❖ Harassment
- ❖ Any other Illegal or Unethical Activity
- ❖ Conflicts of Interest
- ❖ Confidentiality Breach
- ❖ Financial Improprieties
- ❖ Kickbacks
- ❖ Insider Trading
- ❖ Unfair Competition
- ❖ Money Laundering
- ❖ Environmental Violations

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## What Should Not Be Reported?

### What Kinds of Issues Are Not Covered Under the Ethics Line?

Employees should continue to address general questions regarding HR, benefits, 401 (k) plans, payroll, employee programs and services and similar questions or concerns to the appropriate company representatives and other resources. Examples include:

- General Complaints
- Personality Conflicts
- Disagreements with Supervisors or Co-workers
- Dissatisfaction with Policies or Procedures
- Suggestions or Recommendations
- General Issues Concerning Work Assignments
- Schedules or Common Errors or Mistakes
- Health & Safety Questions

For Issues Such As These They Should contact:

- ❖ Your immediate Supervisor or Manager
- ❖ Any member of the Management Team
- ❖ Human Resources

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## Data Protection Awareness Training

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## Why security awareness is so important

- Arvato's business relies on information such as
  - Information from customers who rely on it being safeguarded
  - Arvato owned information which may not to be compromised or misused
- Arvato hence relies on its employees to support and foster a culture of information security
- It is everyone's duty to secure all information to an adequate degree by
  - Taking adequate precautions to safeguard the information
  - Initiating the required processes in case incident occur
- And by "everyone" we mean not only arvato employees but also employees of any organization we do business with
- To make it easier to understand your duties with regard to Information Security, we established 10 Information Security Principles
- Remember, for information security to work, we must all act in concert

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# Why you need to be here?

Security Awareness Training is **mandatory**



The environment we work in is constantly evolving with new **issues/threats** emerging



Where necessary you need to be aware of regulatory requirements, Client and arvato policies to

- follow legal regulations
- fulfil your contractual obligations
- prevent security breaches

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## Introduction



**Data protection belongs to the Fundamental Rights**

**Every person should be able to decide over the intended use or exposure of his personal data**

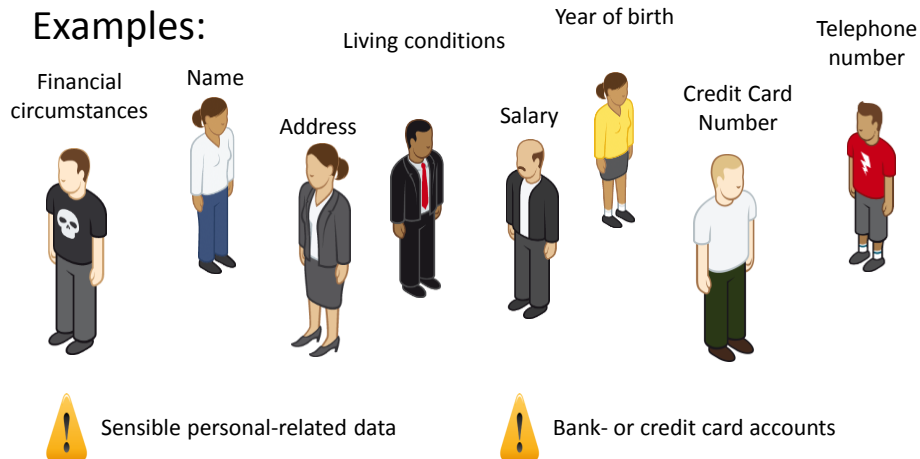
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# Introduction

**Personal data** includes any information for a specific person

## Examples:



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## Legal Regulations

### Confidentiality



Persons employed in data processing shall not collect, process or use personal data without authorization



The obligation of confidentiality shall continue after their employment ends.



Be discreet concerning information or business matters with which you are involved –for both your employer and/or any third parties (i.e. client).



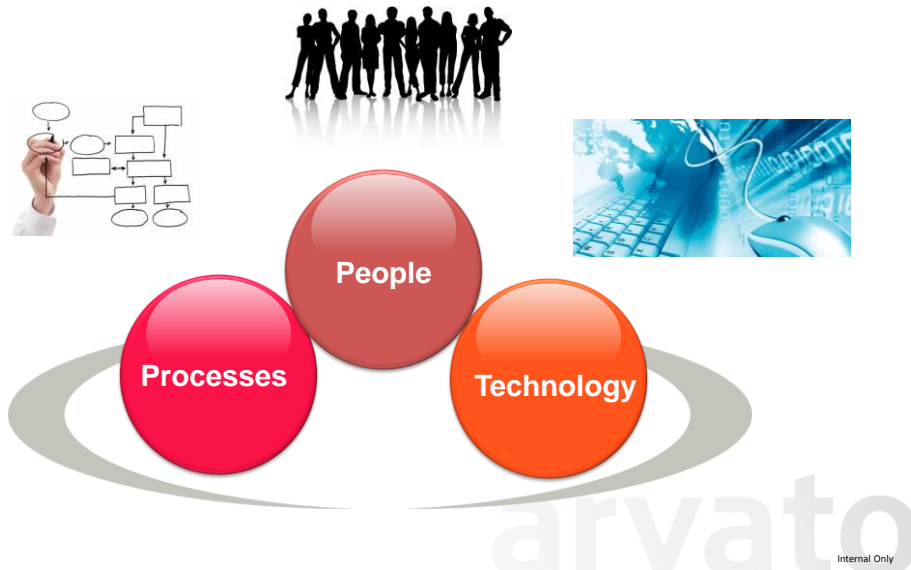
Do not pass on any information to third parties without authorization.



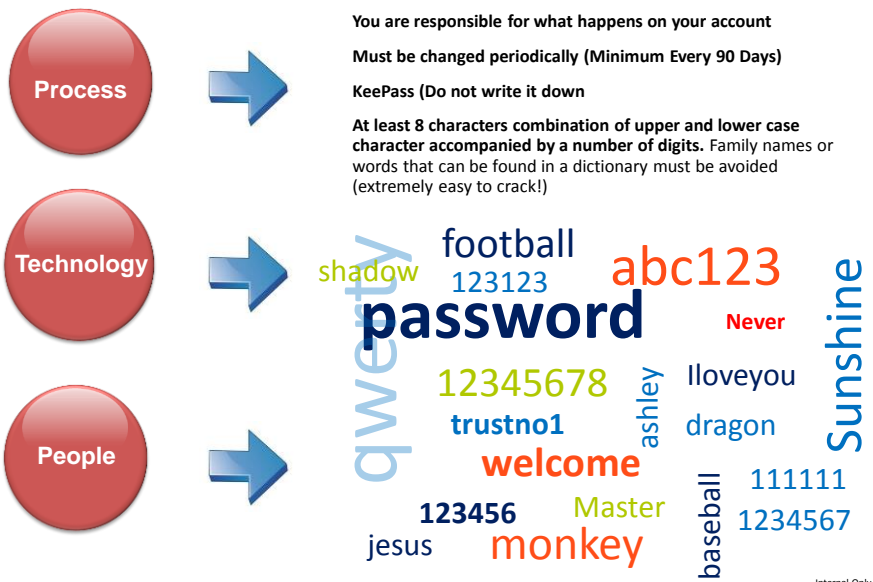
**Always keep Data security / secrecy in mind.**

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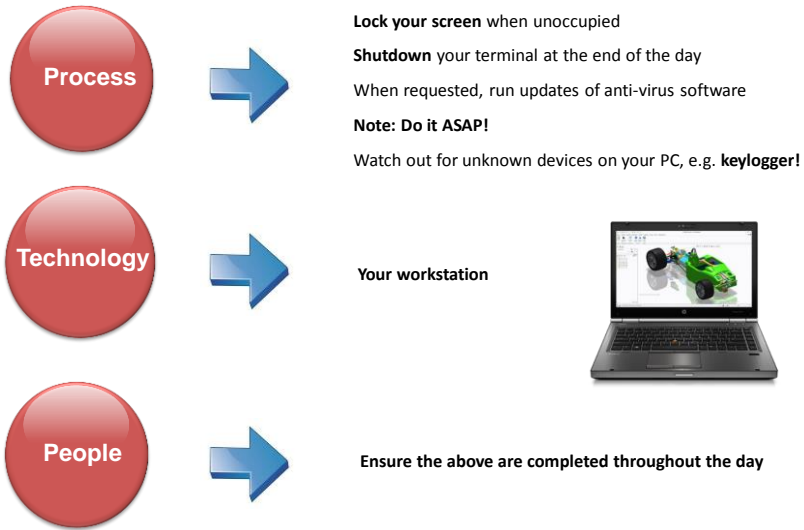
## Security... People, Processes & Technology



## Password Security Guidelines

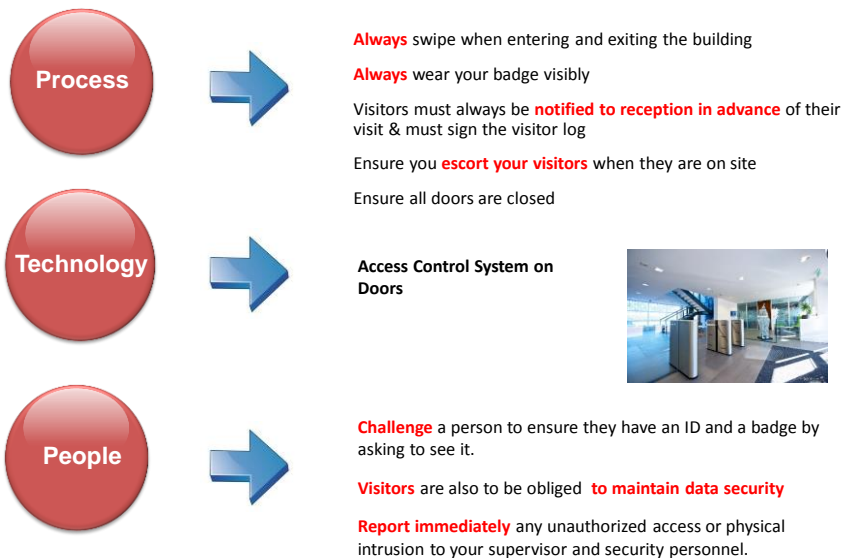


## Workstation / Laptop Security Guidelines



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## Physical Security / Access Guidelines



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## Use of Instant Messaging Guidelines



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## Use of Social Networks Guidelines



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Security Guidelines:

## How to categorize information?

Classification/ Label	Type of information	Audience
public	<ul style="list-style-type: none"> <li>Any that can be published publicly</li> <li>As approved by PR department or local management</li> </ul>	Everyone
Internal (default!)	<ul style="list-style-type: none"> <li>For internal use only</li> <li>Can be made available to anyone within the organization</li> </ul>	Everyone within the organization
confidential	<ul style="list-style-type: none"> <li>Disclosure <b>may endanger the achievement of business objectives.</b></li> </ul> <p><b>AND/OR</b></p> <ul style="list-style-type: none"> <li>Information falls under the scope of <b>data privacy legislation</b> for personal data</li> </ul>	Small dedicated group
Strictly confidential	<ul style="list-style-type: none"> <li>Information of a <b>highly sensitive nature</b></li> </ul> <p><b>AND/OR</b></p> <ul style="list-style-type: none"> <li>Disclosure outside the dedicated group <b>can endanger the achievement of business objectives</b></li> </ul> <p><b>AND/OR</b></p> <ul style="list-style-type: none"> <li>Information is under the scope of <b>data privacy legislation for very sensitive personal data</b></li> </ul>	Very small group

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## Security Guidelines: What To Do With Documents No Longer Needed

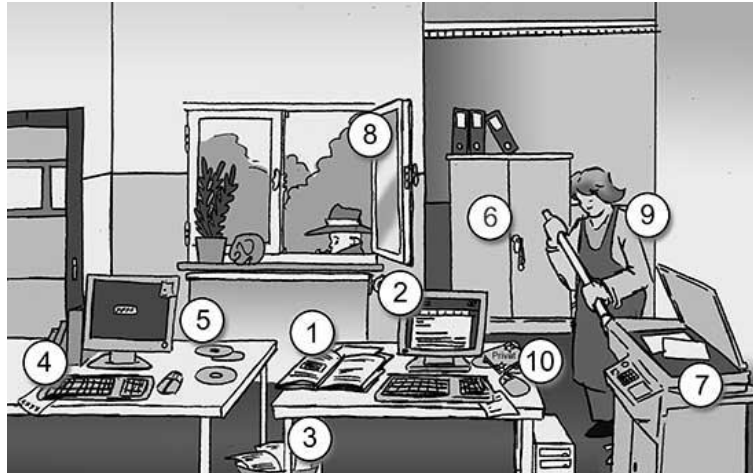
### Shred documents that are no longer needed!

- **Any paper waste** (i.e. memos, BO-memos, duplicates, misprints, etc.) belongs without any exceptions in this bin or needs to be shredded.
- **Do not overfill the bins**, i.e. no-one should be able to reach into the bin and pull any documents out.



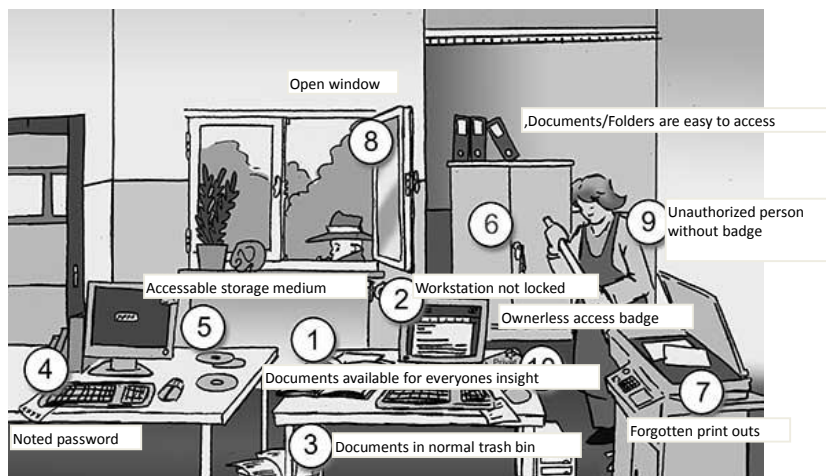
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## Check your Knowledge



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## Check your Knowledge



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## Incident Management

General Awareness Training

Audience: All Agents, Temporary Staff, Management & Suppliers

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## Security Incidents

- A Security incident is:

- Any threat to availability, confidentiality, integrity or reliability of information, outside of normal operations

- Examples:

- Loss of Data
  - typically lost/stolen/damaged media + modified data
    - Data deletion / Modification
    - Hardware medium
- Physical intrusion
- Unauthorised access
  - Access control systems
  - Access to Data
  - Authorization Sharing
  - Credential Sharing
  - Tailgating
  - Unauthorized Visitor
- Natural Hazard
  - Fire
  - Water ingress
- Suspicious findings
  - anything suspicious found in and/or around the building
- Threat
  - bomb or suicide threat, attack or black mail
- Unauthorised data storage
- Virus alert / malicious code



# Security Incidents Response

- High level Response Process
  - When you recognise a security incident please contact your supervisor
  - Do not classify the severity of a potential threat or incident – just report it
  - Make sure no evidence is lost
- i.e. do not clean up the broken glass after a burglary, do not re-boot the PC after data theft etc.
  - Immediate responses (closing a door, calling the fire brigade) will be managed locally
  - The event will be classified and reported to the hotline
  - A local response team, based on a pre defined list, will be organized by the hotline
  - The response team will work on closing the issue and report back

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Incident Management

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## Incident Reporting Channels

How are incidents reported?

- Phone
  - Contact the IT Hotline and state “I want to log a security incident”
  - Internal Phone Number +661-702-7600
  - Internal E-Mail:
- Email
  - Send an email to [ASI-NA, RISC Incident](#) or [rservice.desk@arvatousa.com](mailto:rservice.desk@arvatousa.com).
  - Subject Line: **Security Incident: Misuse of Access**
  - Include as much details as possible in the e-mail body

Call Center Agents should always ask their supervisor to log a security incident on their behalf. This avoids multiple reports from the same floor on the same incident

- Should an anonymous incident need to be reported, please email the **Security Incident Response Team** at [ASI-NA, RISC Incident](#)
- Should a fraud incident need to be reported, please contact your account [HR Business Partner](#)
- Or you may reach out directly to your Country Information Security Officer – **Richard Haft** via phone at **703-483-7693** or via e-mail at [Richard.Haft@arvatousa.com](mailto:Richard.Haft@arvatousa.com)

# Security Incidents

- **Stay discreet** concerning any incidents within the organization
- Report it only to **appropriate channels**
- **Do not** share or release any information to the public
- **Only authorized company representative** shall release official communication to the public



See + React + Report

Thank you for your cooperation

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