

PMG Presse-Monitor: Code of Conduct

Introduction

This Code of Conduct sets out the principles of responsible conduct at PMG Presse-Monitor GmbH & Co. KG (“PMG”). It is binding for all PMG employees. We expect our business partners to comply with equivalent legal and ethical standards when working with PMG. Compliance with this Code of Conduct may form part of contractual agreements and selection decisions.

1. Laws and Regulations

All PMG employees are required to comply with applicable laws and regulations. In particular, the laws of the Federal Republic of Germany and directly applicable European law apply. We expect our business partners to comply with all applicable legal requirements, including regulations concerning corruption, bribery, money laundering, competition law, occupational health and safety. Legal requirements in connection with the use of Artificial Intelligence, in particular those arising from the EU AI Act, must be complied with; the specific provisions on this are set out in Section 7 of this Code of Conduct.

2. Integrity and Honesty

Integrity and honesty are the cornerstones of our actions. We expect employees and business partners to act honestly, transparently, and responsibly. Misrepresentation, fraud, and deception are not tolerated.

3. Conflicts of Interest

Employees must consistently avoid conflicts of interest. Personal interests must not take precedence over PMG’s interests. Business partners must disclose potential conflicts of interest affecting cooperation with PMG and avoid decisions influenced by improper advantages.

4. Anti-Corruption

PMG rejects corruption and bribery in any form. Employees and business partners must avoid and refrain from all forms of bribery and corruption. This applies in particular in accordance with Section 299 of the German Criminal Code (StGB) (commercial bribery and bribery in business transactions) as well as comparable national and international anti-corruption regulations

a. Gifts and Invitations	b. Facilitation Bribes	c. Transparency and Control
<p>Accepting or granting gifts, invitations, or other benefits is prohibited if they are capable of influencing business decisions. Only low-value benefits within customary business practice are permitted.</p>	<p>Offering, promising, granting, or demanding facilitation bribes or similar advantages to obtain or secure business is prohibited.</p>	<p>PMG values transparent and traceable business processes. Financial transactions must be properly documented and conducted in accordance with applicable requirements.</p>

5. Competition

PMG is committed to fair and free competition and rejects any form of cartel agreement or anti-competitive conduct.

Employees must not enter into agreements or engage in conduct that unlawfully restricts or distorts competition. We expect our business partners to comply with the applicable competition and antitrust rules in the course of their cooperation with PMG, in particular the provisions of the German Act against Restraints of Competition (GWB) and the relevant European competition rules, in particular Articles 101 and 102 TFEU. Anti-competitive conduct includes, in particular:

a. Price-Fixing and Market Allocation	b. Boycott of Competitors	c. Impermissible Exchange of Information
<p>Agreements with competitors on prices, discounts, or other business terms, as well as agreements on the allocation of markets, customers, or geographic areas.</p>	<p>Calls to boycott competitors or to hinder their business activities.</p>	<p>The exchange of confidential business or market information with competitors that is not publicly available and may distort competition.</p>

6. Information and Data Protection

PMG respects the protection of personal data and the confidentiality and integrity of information, in compliance with the General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).

a. Data Collection and Use	b. Transparency and Data Subject Rights
<p>Personal data is collected and processed only for legitimate business purposes and in compliance with applicable data protection laws.</p>	<p>Individuals are informed transparently about the processing of their data. Rights of access, rectification, and deletion are respected.</p>
c. Data sharing	d. Data Security and Confidentiality
<p>Personal data and confidential information are shared with third parties only where legally permissible and, where necessary, after informing the affected persons. We expect our business partners to use confidential information received in the course of cooperation with PMG exclusively for the intended purpose and in compliance with applicable legal requirements.</p>	<p>PMG implements appropriate technical and organizational measures to protect personal data, confidential information, and digital systems against unauthorized access, loss, or misuse. This includes secure handling of access credentials, passwords, multi-factor authentication, digital tools, protection against phishing and social engineering, and the exclusive use of approved systems and applications. Security-relevant incidents or suspected incidents must be reported without delay in accordance with internal requirements. Employees are obliged to protect confidential information and to prevent its unauthorized disclosure or misuse.</p>

7. Artificial Intelligence

The use of Artificial Intelligence (AI) at PMG is responsible, transparent, and compliant with applicable legal requirements, particularly Regulation (EU) 2024/1689 (EU AI Act). AI serves as a supporting tool; responsibility and decision-making authority always remain with humans. Risks of discrimination must be minimized and fundamental rights protected. Users are informed transparently when interacting with AI systems. PMG does not use AI systems classified as prohibited practices under the EU AI Act, in particular manipulative, surveillance based, or discriminatory applications. Detailed provisions are defined in PMG’s separate AI Policy.

8. Social Responsibility, Environment, and Human Rights

PMG respects human rights and assumes social responsibility in the course of its business activities.

a. Environmental Protection	b. Child Labor	c. Forced Labor and Modern Slavery
<p>PMG strives to minimize its environmental impact, including waste reduction, efficient use of resources, compliance with all environmental laws and regulations. Sustainable practices and technologies are promoted where appropriate.</p>	<p>Child labor is not accepted. Business partners are expected to prevent child labor in their operations and supply chains in accordance with international standards, particularly those of the ILO.</p>	<p>PMG rejects all forms of forced labor and modern slavery and expects business partners to take appropriate measures to prevent them.</p>
d. Working Conditions and Fair Wages	e. Occupational Health and Safety	f. Non-Discrimination and Inclusion
<p>PMG supports fair working conditions, including appropriate wages, compliance with working-time regulations, and freedom of association. We expect our business partners to comply with applicable minimum labor standards in the course of their business activities.</p>	<p>The safety and health of employees are top priorities. PMG provides working conditions that support health and safety and comply with applicable occupational safety requirements.</p>	<p>Discrimination and harassment based on gender, age, ethnic origin, religion, sexual orientation, or other personal characteristics are not tolerated. PMG promotes a respectful and inclusive working environment in which diversity is valued.</p>

9. Copyright and Rights

PMG respects intellectual property and complies with applicable copyright, trademark, and other intellectual property laws, in particular the German Copyright Act (UrhG). Content is used only within granted rights of use and contractual agreements. Unauthorized reproduction, modification, distribution, or other use of protected content is not accepted.

10. Commitment

PMG contributes to a functioning media and information ecosystem. In particular, it promotes the legally compliant use of journalistic content and thereby supports quality journalism and media diversity. PMG also supports educational and social initiatives where possible.

11. Responsibility of Managers

Managers bear special responsibility for implementing and ensuring compliance with this Code of Conduct. They act as role models, inform their teams about this Code of Conduct, and promote compliant and responsible conduct in daily work.

12. Reporting and Violations

All PMG employees share responsibility for compliance with this Code of Conduct. Information regarding potential violations may be reported confidentially to the relevant manager or responsible internal departments.

Reports made in good faith will not result in disadvantages. Retaliation or discrimination due to a report is not tolerated. Violations will be investigated and may result in appropriate measures.

If you have questions, managers and/or the company management are available.

Conclusion

This Code of Conduct supports employees and business partners of PMG Presse-Monitor GmbH & Co. KG in acting ethically and in compliance with the law.

About PMG Presse-Monitor GmbH & Co. KG

PMG is one of the leading providers of digital media monitoring, press review creation, and media analysis services in German-speaking countries. More than 900 publishers and content producers worldwide make their content available through PMG for legally compliant secondary use. PMG markets content and rights to PR professionals, corporate communications departments, public authorities, and professional media monitoring organizations.

Founded in 2001, PMG is a joint venture of German newspaper and magazine publishers with the shareholders Axel Springer, Frankfurter Allgemeine Zeitung, Gruner + Jahr, Handelsblatt Media Group, Hubert Burda Media, Spiegel Verlag, Süddeutsche Zeitung, and the German Association of Digital Publishers and Newspaper Publishers (Bundesverband Digitalpublisher und Zeitungsverleger) as well as the Media Association of the Free Press (Medienverband der freien Presse).

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