

# CODE OF ETHICS



## OUR CODE OF ETHICS

Our code of ethics forms the basis of our actions and our decisions within and outside of Tölke.

We align ourselves with legal provisions as well as high ethical and moral standards. The basis of our code of ethics is the UN Global Compact – the world’s largest and most important initiative for responsible business management.

## OVERVIEW OF OUR PROCESSES

- Our social etiquette
- The demands on our services
- Integrity and compliance
- We are committed to anti-discrimination and employee protection
- Responsibility for the environment



### DIE ZEHN PRINZIPIEN DES GLOBAL COMPACT

1. Unternehmen sollen den Schutz der internationalen Menschenrechte unterstützen und achten.
2. Unternehmen sollen sicherstellen, dass sie sich nicht an Menschenrechtsverletzungen mitschuldig machen.
3. Unternehmen sollen die Vereinigungsfreiheit und die wirksame Anerkennung des Rechts auf Kollektivverhandlungen wahren.
4. Unternehmen sollen für die Beseitigung aller Formen von Zwangsarbeit eintreten.
5. Unternehmen sollen für die Abschaffung von Kinderarbeit eintreten.
6. Unternehmen sollen für die Beseitigung von Diskriminierung bei Anstellung und Erwerbstätigkeit eintreten.
7. Unternehmen sollen im Umgang mit Umweltproblemen dem Vorsorgeprinzip folgen.
8. Unternehmen sollen Initiativen ergreifen, um größeres Umweltbewusstsein zu fördern.
9. Unternehmen sollen die Entwicklung und Verbreitung umweltfreundlicher Technologien beschleunigen.
10. Unternehmen sollen gegen alle Arten der Korruption eintreten, einschließlich Erpressung und Bestechung.

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## THE BASIS FOR OUR SOCIAL ETIQUETTE: RESPECT.

The fundament for our cooperation is mutual respect and appreciation for one another. We acknowledge cultural differences, live a culture of open doors, honest words, respectful meeting-manners as well as a collegial informality – on all levels.

For us is fair payment a matter of course. Within the possibilities of the company flexible working times are implemented. For that we always have the person and their individual living situation in mind. We give confidence to each of our employees to be a representative of the company within their individual tasks. Our employees identify themselves with the company. This way they live up to our values in their leisure time and see themselves as representatives of Tölke.

Respect and recognition is also an important matter for us when dealing with our customers and service providers. They know: A handshake matters to us. Together we look for solutions, if difficulties arise

We act fairly towards our competitors on the market. The adherence to all competition and cartel regulations as well as a commitment to the open competition is self-evident for us.

## WHAT WE ACTUALLY DO:

- Transfer the guiding principle to all employees
- Welcome for new employees: The central points of our company culture are communicated verbally and documented in writing
- Flexible and individual adapted working time models
- Authorising employees for their individual tasks
- Employees, mutually and regardless of hierarchy, acknowledge the internal rules and principles of the company culture
- *See also below: Integrity and compliance principle*

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## **OUR PRINCIPLES: SERVICE.**

Our services are one thing most of all: professional. Knowledge, a high quality of training and specialization, the best possible service and orientation on the needs of our customers are crucial for this. Fast and flexible solutions are our claim – anywhere in the world. This applies for our fully authorised employees at the respective working sites as well as for the managing directors: the verbal agreement.

## **WHAT WE ACTUALLY DO:**

- In-house training and development of employees  
(target rate for apprenticeships > 10 % of the workforce p.a. + actual take-over rate after a successful apprenticeship: > 95 %)
- Regular and specific specialisation
- Commitment to the “Honourable Merchant”-code

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## **OUR PRINCIPLES: INTEGRITY AND COMPLIANCE.**

Our success is also based on respecting ethically and legally impeccable behaviour. We strictly adhere to the applicable laws, regulations, directives, standards, voluntary codes and practices in Germany and in all countries in which we actively conduct business.

We reject all forms of corruption or bribery and act proactively in this regard. Our employees are strictly forbidden to accept gifts or other benefits if any prohibited business transactions could or do arise from this. Our employees are informed about the compliance guidelines. We have appointed a compliance arbitrator for the prevention and uncovering of compliance violations. This person can be approached in confidence for any possible irregularities. We have developed guidelines for our suppliers where we ask them, for example, to abstain from intended gifts and instead make a voluntary donation to social institutions in our region.

At Tölke, data protection and information security are included in the topic of integrity. We guarantee adherence to confidentiality, as well as the quality and reliability of data from our databases. We employed an external data protection representative who also ensures the minimisation of risks. We transfer export management and logistics to companies which specialise in this, and which ensure the adherence to all regulations and directives.

## **WHAT WE ACTUALLY DO:**

- Compliance guidelines as the working basis for every (new) employee and
- Supplier guideline
- Refusal of gifts
- Data protection representative for compliance with the data protection directive

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## **OUR PRINCIPLES: ANTI-DISCRIMINATION AND EMPLOYEE PROTECTION.**

We guarantee equal treatment of all employees, regardless of their nationality, skin colour, gender, sexual orientation, political or religious conviction, social background or age. Equal opportunities and the principle of “equal pay for equal work”, where appropriate depending on age and period of employment, are central aspects for us.

We respect the personal dignity, privacy and rights of personality of all employees, customers and suppliers. We strictly prevent mental and physical abuse as well as sexual harassment. By appointing two persons in a position of trust (m/f), we protect our employees from any discrimination, harassment and from the exploitation of positions of power. Apprentices are also widely integrated into business processes and given changing, content-related responsible persons.

The safety and protection of our employees take the highest priority for us. We implement this by way of training courses, emergency plans and health and safety measures and such. We do not carry out business trips into risk regions based on the corresponding travel and safety information of the Federal Foreign Office.

### **WHAT WE ACTUALLY DO:**

- Contractual salary ranges following professional criteria
- Appointment of two persons in a position of trust (m/f)
- Protection from travelling in conflict areas
- Training, health and safety at work measures, emergency plans

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## **OUR PRINCIPLES: RESPONSIBILITY FOR THE ENVIRONMENT.**

Cf. environmental declaration. See environmental declaration.