

# Code of Conduct for TÜV Rheinland.



## Foreword

TÜV Rheinland<sup>1</sup> aims to be the world's best sustainable and independent provider of services for testing, inspection, certification, consultation and training. For us, being the best means that our TÜV Rheinland brand stands for the highest integrity, respectability and quality and that we render our services through excellent processes and generate sustainable earnings.

We have acquired the high reputation of the TÜV Rheinland brand over more than 140 years – through the great expertise of our employees and the high reliability and quality of our services. Our greatest aspiration is to secure this reputation for the long term and to live up to the expectations associated with our brand. We will continue to consistently refrain from business activities that do not meet this aspiration in the future. The trust of customers, colleagues and the public is crucially dependent on the credibility, correct conduct and commitment of each and every employee. As a result, every employee influences the standing of TÜV Rheinland.

TÜV Rheinland is committed to its social responsibility and the universal principles and values as they are laid down in the relevant documents and agreements of the United Nations and the European Union. These include human and labor rights, preserving and sustainably protecting the environment and combating forced labor, child labor and corruption in any form. We are committed to a socially responsible market economy and the basic principles of freedom, volition and equal opportunity. These values underlie our social responsibility that we uphold as company. Our dialog with contacts from science, politics, industry, commerce, economy, public officials and NGOs is guided by these values, and we also support the voluntary activities of our employees in this spirit wherever possible.

Our Code of Conduct contains the principles and rules that are decisive for us in our dealings with colleagues, business partners, customers and the broader public. The principles set out in this document are minimum standards that are binding for all employees and therefore also for TÜV Rheinland's senior management teams around the world. Our Code of Conduct thus represents a set of guidelines to follow in our everyday work. It increases mutual understanding, supports us in carrying out our everyday work and ultimately helps us to be a successful service provider on the global markets.

It is the duty of managers to set a good example and to put the values of TÜV Rheinland into practice as well as to support their employees in adhering to and complying with the Code of Conduct.

TÜV Rheinland expects all employees to take the necessary time to familiarize themselves with this Code of Conduct and integrate it into their everyday work. If any problems or questions arise regarding the implementation of this Code, you should contact your manager or a compliance officer.

August, 2020



Chief Executive Officer of TÜV Rheinland

#### **GENERAL PRINCIPLES AND SCOPE**

Our Code of Conduct is based on the values of the UN Global Compact and the compliance principles of the TIC Council. Moreover, the following principles firm up the understanding of values of TÜV Rheinland. They are intended to help to deal with legal and ethical challenges, provide guidance and therefore increase trust in TÜV Rheinland's services and integrity.

Every employee complies with all applicable laws as well as the following rules and principles from this Code of Conduct. The senior management teams and managers are responsible for ensuring that all their subordinate employees are familiar with and comply with this Code of Conduct. Managers have a responsibility to act as role models in applying the principles of this Code of Conduct. We do not allow ourselves to become involved in activities that clearly aim to manipulate statutory or other regulations. All employees may ask managers or compliance officers for advice if they are unsure about how to apply this code or other internal guidelines.

The term "employee" refers to all full-time and part-time employees, managers, senior managers and members of the Executive Board or the Supervisory Board of TÜV Rheinland AG. This Code of Conduct is binding for all employees of companies which are wholly owned by the TÜV Rheinland Group or in which it holds at least 51% of the shares. For all other shareholdings, the Group's Executive Board will suggest that these companies adopt the Code of Conduct and compliance rules of TÜV Rheinland. As far as possible, business partners, and especially suppliers, consultants, intermediaries, collaboration partners, agents and subcontractors, should also be bound to this Code of Conduct.

#### **ANTI-DISCRIMINATION**

TÜV Rheinland expects all employees to respect the personal dignity, private life and personal rights of each individual. We do not tolerate discrimination on any grounds; for example, age, gender, sexual orientation, ethnic origin, religion or disability. Personal or sexual harassment, insults and bullying are prohibited. Using violence or threatening the use of violence or physical punishment is forbidden.

Respect and tolerance are the basis for our corporate culture, which is aligned with the corporation's goals. The values and principles of good leadership of employees are recorded for our managers in a separate document – the leadership principles. We also include the topics of anti-discrimination and promoting diversity in our internal personnel development programs.

#### **HEALTH AND SAFETY**

Safe working equipment and working conditions must be available for all employees. Appropriate measures shall be taken to prevent accidents at the workplace and to counter occupational health hazards.

If employees take medication which impairs the safe performance of their work, in particular the driving and operation of vehicles or other machines, and they nevertheless operate vehicles and machines, they endanger themselves and others.

#### **FAIR LABOUR**

TÜV Rheinland employs its staff under fair wage and working conditions. Fair and appropriate working conditions are expected to be provided for all employees. TÜV Rheinland is conscious of its social responsibility towards employees, society and the environment and respects human rights.

#### **ENVIRONMENTAL PROTECTION**

Sustainability is important! It is our goal to help shaping a future that provides a sustainable outlook for all people, and to adhere to applicable environmental laws worldwide. We want to use the knowledge of environmental and other technologies that exists within TÜV Rheinland to help prevent and overcome environmental disasters and contribute to the development of technical solutions. As we have pledged to provide services in the interest of humans and the environment, TÜV Rheinland encourages all employees to consider the consequences of their actions on humans, the environment and society and to use whatever influence they have to reduce or prevent damage to the environment.

#### **INTEGRITY OF SERVICES AND DOCUMENTATION**

All employees must maintain the highest possible degree of reliability, neutrality and personal and professional integrity in all matters relating to their work. All employees must uphold TÜV Rheinland's excellent reputation and image and refrain from any actions that could have a negative impact on a TÜV Rheinland company or the TÜV Rheinland Group as a whole. All employees must comply with legal regulations and other requirements such as current accreditation requirements. They must follow the generally binding regulations and procedures set by us. Where there is room for interpretation in the provision of a service, our employees are required to act according to the best of their knowledge and in good faith in order to avoid harming people and nature. No employee may offer services without payment or guarantee a certain outcome for a test or certification process.

Our test results and reports are documented in accordance with the current technical and professional standards. They must be clear, understandable and reproducible, as they may influence the safety and wellbeing of the future users

of our customers' products and services. If customers have further questions about the services rendered or the results of our work, we explain them to the customer.

#### **FINANCIAL REPORTING**

TÜV Rheinland observes applicable accounting and financial reporting principles based on national and international rules and regulations. The required documentation for reporting must be complete, correct and truthful, as well as produced in compliance with the applicable standards.

#### **DATA SECURITY, CONFIDENTIALITY AND DATA PROTECTION**

As a testing company, we regularly gain deep insights into the structures, processes and economic foundations of other companies, organizations and institutions. The security of customer data and the confidentiality of information are of the greatest importance and must be ensured at all times; before, during and after the provision of services within the agreed scope. Confidential information is protected against access by third parties. Employees who have access to or control confidential or proprietary information must take the appropriate and prescribed security precautions to prevent misuse and disclosure. Personal data is collected, processed and used for commercial purposes only within the boundaries of the applicable legal framework. Where there is any suspicion that data protection regulations have been infringed, the manager responsible or the data protection officer must be informed.

#### **COMMUNICATIONS**

Official statements to media representatives are the preserve of the Group's Executive Board and the Corporate Communications department. All external queries must be forwarded to these authorized units.

#### **FAIR BUSINESS CONDUCT**

TÜV Rheinland complies with the applicable competition and antitrust laws. TÜV Rheinland follows the principle of achieving financial and commercial objectives in a fair and legal manner. We do not participate in any activities that aim to achieve commercial advantages through illegal or unethical practices and are not afraid to reveal any shortcomings where possible if these impede transparency and fairness in competition.

#### **CONFLICTS OF INTEREST**

Conflicts of interest can jeopardize the independence and integrity of TÜV Rheinland. All employees are required to avoid conflicts between personal and business interests. As soon as a conflict of interest seems possible, it must be disclosed to the manager or a compliance officer. If a conflict of interest has been identified, it is assessed in a transparent manner in order to avoid the appearance of personal advantage being gained. As a final consequence, a business relationship may be terminated or an order not pursued any further. More detailed provisions are set out in the guidelines for the prevention of conflicts of interest and corruption.

#### **ANTI-CORRUPTION**

TÜV Rheinland rejects any form of corruption. Corruption and bribery cause lasting damage to the trusting business relationship we have with our customers and business partners and harm the reputation of our company, our partners and society as a whole. Any form of active or passive bribery as well as granting or accepting undue advantages is forbidden and will be reported to the police. Even the mere appearance of corrupt behavior must be avoided. Gifts and invitations issued to business partners and TÜV Rheinland employees must not be intended to influence a business

decision or be construed as doing so. All invitations and gifts must be socially appropriate and made known to the manager or compliance officer in a transparent manner. They must be limited in frequency and value. Monetary gifts are never permissible.

The impartiality and integrity of civil servants and public officers must not be damaged. Officials, government representatives, representatives of regulatory authorities, politicians or representatives of other public institutions therefore must not receive offers, gifts or invitations of any kind that would jeopardize their impartiality and integrity. TÜV Rheinland's guidelines for the prevention of conflicts of interest and corruption provide some examples of invitations and gifts that can be accepted and those that must be refused.

#### **MONEY LAUNDERING**

TÜV Rheinland does not participate in money laundering activities that serve to conceal and absorb money and assets from criminal or illegal transactions. If there are signs of unusual transactions, especially using cash, inform Finance/Tax or a compliance officer when in doubt.

#### **DONATIONS AND SPONSORSHIP**

Our commitment to social responsibility also takes the form of donations and sponsorship activities. As a basic principle, donations and sponsorships are permitted within the framework of the donation and sponsorship guidelines and are subject to the limits imposed by them. Funds and intended uses are guided by the criteria set in the guidelines.

#### **EXCLUSION AND NON-ASSOCIATION**

TÜV Rheinland has committed itself to complying with the principles of the UN Global Compact and the TIC Council. We avoid doing business with companies whose main products conflict with these principles. These include in particular manufactures of land mines or weapons of mass destruction. As far as the law allows, we distance ourselves from business relationships with companies that fall foul of the law by violating human rights, supporting slavery and forced labor or systematically using child labor as part of their business model. TÜV Rheinland takes decisions on non-association with third parties in individual cases on the basis of a transparent assessment.

The Compliance Office will be informed in the event TÜV Rheinland become aware of a serious matter of misconduct on the part of a customer or partner after the business relationship has been established. These authorities will then decide how to proceed. If it becomes clear that the customer's/partner's behavior is unlikely to change promptly, the business relationship should be terminated.

#### **VIOLATIONS AND SANCTIONS**

If an employee observes a deviation from this Code of Conduct or discovers misconduct, that employee has the options of informing his or her manager or compliance officer or posting information via the whistleblower platform. In particular, this applies to cases of fraud, corruption, infringements of competition law, financial misstatements or other behavior that could lead to prosecution or that constitute a violation of the applicable laws. A web-based reporting point for anonymous information is available in the form of the whistleblower platform, which can be accessed via the intranet and the TÜV Rheinland website. Customers, business partners and third parties can also submit information to one of the named

contact persons. As far as the law allows, the information will be treated as strictly confidential and used to investigate the incidents received and initiate the necessary and appropriate measures. Any breach of the Code of Conduct may initiate disciplinary or legal measures that may also result in claim damages by TÜV Rheinland or third parties. Where necessary, TÜV Rheinland will also inform the investigative authorities in order to avoid damage to the company.

Employees who report misconduct or infringements of the Code of Conduct should not suffer any disadvantage as a result, unless it is proven that false information was given on purpose with the intention of discrediting colleagues.

#### **CLOSING REMARKS**

This Code of Conduct applies to TÜV Rheinland. National or region-specific regulations that contradict the principles specified herein serve to complement the code and will be taken into account. The rights of workers' participation committees remain unaffected. The consistent implementation of the Code of Conduct is monitored on an ongoing basis. Modifications are possible from time to time. The relevant senior managers and managers should ensure that all employees are familiar with the current version of the Code of Conduct at all times. The Code of Conduct should be a part of general employee training as well as personal training and development.

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