

T.D.M. Telefon-Direkt-Marketing GmbH

Business Conduct Guidelines

TDM.

Wir sprechen Erfolg

CODE OF CONDUCT

T.D.M. Telefon-Direkt-Marketing GmbH

Code of conduct

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I. Principles and objectives

The public image of T.D.M. Telefon-Direkt-Marketing GmbH is essentially shaped by the appearance and behavior of each individual employee. Therefore, each individual employee is also responsible for ensuring that his or her actions and omissions do not damage the environmentally and socially conscious image of T.D.M. Telefon-Direkt-Marketing GmbH, but rather promote it.

The Business Conduct Guidelines are binding rules that apply to every employee. They are intended to help overcome ethical and legal challenges in day-to-day work.

Every employee may contact the relevant supervisor at any time with questions and comments in connection with the Business Conduct Guidelines. In addition, employees of T.D.M. Telefon-Direkt-Marketing GmbH have the option of contacting the internal or external whistleblowing office.

Incorporated into this Business Conduct Guideline is the industry code of conduct of the Callcenter Verband Deutschland e.V.

(https://callcenter-verband.de/wp-content/uploads/2011/09/CCV_Ehrenkodex.pdf)

As well as the code of ethics of the DDV. (Deutscher Dialogmarketing Association e.V. (https://www.ddv.de/fileadmin/user_upload/pdf/Verband/Qualitaet/DDV-Ehrenkodex_01.pdf))

In particular, T.D.M. shall strictly adhere to the conduct and laws described therein regarding telephony and written communication between T.D.M. and the customers of the parties placing the order.

II. Basic behavioral requirements

II.1. Law abiding behavior

Compliance with the law is a top priority for our company. Each employee must comply with the legal and internal regulations governing their activities, within the framework of which they act. Violations of the law must be avoided at all costs, especially violations punishable by imprisonment, fines, or penalties.

Every employee must expect disciplinary consequences in the event of a violation irrespective of the sanctions provided for in the law due to the violation of their employment contract obligations.

II.2. Responsibility for the reputation of T.D.M. Telefon-Direkt-Marketing GmbH

Everyone at T.D.M. GmbH takes responsibility for their actions. In complying with our guidelines, we rely on the joint responsibility of the company management, executives and all employees.

Inappropriate conduct or behavior by even one employee can cause considerable damage to the company.

Every employee is required to take care of the public image of T.D.M. Telefon-Direkt-Marketing GmbH.

The fulfillment of tasks must be oriented to this in all respects.

II.3. Mutual respect, honesty and integrity

We respect the personal dignity, privacy and personal rights of each individual. We work together with people of different origin, nationality, culture, religion, ideologies, age, disabilities and sexual identity.

We do not tolerate discrimination, sexual, or other personal harassment or insults. We stand by our responsibility.

We are reliable partners and make commitments that we can keep.

These principles apply both to colleagues and conduct towards customers and external partners.

II.4. Leadership, responsibility and supervision

Every executive bears responsibility for the employees entrusted to them. The manager earns their recognition through exemplary personal behavior, performance, reliability and social competence. They set clear, ambitious and realistic goals, lead through trust and give employees as much personal responsibility and freedom as possible.

Every manager has organizational and supervisory duties to fulfill. They are responsible for ensuring that no violations of the law occur in their respective areas of responsibility that could have been prevented or made more difficult by careful supervision. They also retain responsibility in the event of delegation of individual tasks.

The following specifically applies to leadership, responsibility, and supervision:

- The supervisor shall carefully select employees based on personal and professional suitability. The duty of care increases with the importance of the task the employee has to perform (duty of selection).

- The supervisors should set the tasks precisely, in particular with regard to compliance with the legal provisions (obligation to give instructions).
- The supervisors must ensure that compliance with the statutory provisions is continuously monitored (duty to monitor).
- The supervisors should clearly communicate to employees that violations of the law are frowned upon and will have consequences under employment law.

The compensation of T.D.M. employees is above the industry and local average. In addition to monetary compensation, this includes a large number of allowances in the area of retirement benefits, discounted and environmentally friendly commuting thanks to the Job Ticket, Sunday and holiday allowances, voluntary allowances (e.g. seasonal allowances), a meal allowance, many discounts, subsidies, and corporate benefits in the area of sports, shopping, and dining.

III. Dealing with business partners and third parties

III.1. Observance of competition law and antitrust law

Only fair competition enjoys the right to develop freely. The imperative of integrity also applies in the competition for market share.

Every employee is obliged to comply with all rules of fair competition. In particular, employees may not engage in discussions with competitors in which prices or capacities are discussed.

Further agreements with competitors on a waiver of competition or on the submission of sham bids in tenders are not permitted.

Fair contracts with appropriate consideration are concluded with suppliers. In return, we expect them to treat their employees and suppliers fairly as well.

III.2. Offering and granting benefits

To acquire orders, we recommend ourselves with the quality and price of our innovative services. No employee may offer or grant unauthorized advantages to others in connection with business activities - directly or indirectly - neither as monetary payments nor in the form of other benefits.

Gifts and gratuitous benefits to employees of business partners must be selected in such a way as to avoid any appearance of dishonesty or impropriety on the part of the recipient.

If in doubt, ask the recipient to obtain prior approval for receipt from their supervisor. Employees who conclude contracts with consultants, intermediaries, agents or comparable third parties must ensure that they do not offer or grant any unauthorized benefits.

III.3. Requesting and accepting benefits

No employee may use their official position to demand, accept, obtain or be promised benefits. This does not include the acceptance of occasional gifts of small value (maximum €35) and promotions agreed by business partners that benefit employees. Other gifts are to be refused or returned.

III.4. Special rules for the award of contracts

Anyone who applies for a contract expects us to review their bid fairly and without bias. Employees involved in awarding contracts must observe the following rules in particular:

- The employee shall promptly disclose to their supervisor any personal interest that may exist in connection with the performance of their official duties.
- Suppliers should not be unfairly favored or hindered when competing for contracts.
- Invitations from business partners may only be accepted if the occasion and scope of the invitation are appropriate, i.e. the material or immaterial value does not exceed € 100 and refusal of the invitation would contradict the requirement of politeness.
- Gifts from business partners are to be refused and returned, unless they are insignificant occasional gifts of low value (maximum €35).
- No employee may have private assignments performed by companies with which they have business dealings if this could give them an advantage. Exceptions are general discount promotions granted by customers to employees and/or T.D.M.

III.5. Donations

As a company, T.D.M. Telefon-Direkt-Marketing GmbH grants monetary donations and in kind for education and science, for art, culture, sports and for social causes. Our company receives requests for donations from a wide variety of organizations, institutions and associations.

Für die Vergabe von Spenden gelten folgende Regeln:

- Requests for donations from individuals are to be generally rejected.
- Payments to private bank accounts are not permitted.
- Under no circumstances may a donation be granted to persons or organizations whose objectives are incompatible with those of T.D.M. Telefon-Direkt-Marketing GmbH.
- The donation must be transparent. The recipient of the donation and the specific use by the recipient must be known. The reason for the donation and the intended use must be accounted for at all times.

IV. Avoidance of conflicts of interest

IV.1. Avoidance of conflicts of interest

The company attaches importance to ensuring that its employees do not have conflicts of shares or loyalty in the course of their work. Such conflicts may arise if an employee works for or has shares in another company. Therefore, the principle of avoiding conflicts of interest applies.

IV.2. Non-compete clause

The employee is not permitted to work for a company that competes with T.D.M. Telefon-Direkt-Marketing GmbH in whole or in part.

Prior written permission is required in the case of participation in a company which is a business partner of T.D.M. Telefon-Direkt-Marketing GmbH. Permission is granted by the management and documented in the personnel file. Permission is not granted or can be withdrawn again if the employee is involved with the respective company on official business.

V. Dealing with facilities and information

V.1. Use of facilities

The equipment and facilities (e.g. telephone, printer, PC including software and internet/intranet, machines, and tools) may only be used for official business. Exceptions and, if applicable, payment will be regulated locally. Under no circumstances may content be improperly accessed or passed on.

No employee is permitted to make any recordings, files, visual or audio documents, or copies without consent, unless this is directly related to the professional activity.

V.2. Records and reports

Open and effective cooperation includes accurate and truthful reporting. This applies equally to the relationship with investors, employees, customers, business partners, the public, and government agencies.

All records and reports made internally and/or given to outside parties must be accurate and truthful. According to the principles of proper accounting, data entries and other records must always be complete, correct, timely, and system-compatible.

The requirement to provide truthful information also applies to expense reports.

V.3. Confidentiality

Confidentiality must be maintained with regard to internal matters of the company that have not been disclosed to the public. This includes, for example, details concerning the organization of the company and its facilities, as well as internal reporting figures. The obligation to maintain confidentiality continues to apply even after termination of the employment relationship.



V.4. Data protection and data security

Electronic information exchange and dialogue, electronic business transactions are crucial prerequisites for the effectiveness of each of us and for business success as a whole. However, the advantages of electronic communication are connected with risks for personal privacy and data security. Effective precautions against these risks are an important part of IT management, leadership and also the behavior of each individual.

Personal data may only be collected, processed, or used if necessary for defined, clear, and lawful purposes. A high standard for data quality and technical protection against unauthorized access is ensured. This also applies to the use of data, which should be transparent for those affected. Your rights to information, correction, and if necessary, to objection, are safeguarded.

VI. Environment, society, safety, and health

VI.1. Environment, society, and technical safety

Protecting the environment and preserving its resources are not only corporate goals, but also high priority.

In our day to day work, we ensure compliance with environmentally and climate friendly practices in order to achieve sustainable economic action that coincides with the law.

TDM avoids wasting resources and has a well-functioning recycling strategy of recyclable materials generated in everyday operations. Our company acknowledges its shared responsibility for general public issues.

We support socio-political measures, advocate for the disadvantaged both inside and outside of society, and enable our employees to engage meaningfully in community tasks.

T.D.M. is aware of its task and responsibility as a medium-sized company, employer and part of society in the region. T.D.M. is involved in schools, sports clubs and participates in events.

The training of young talents in the field of dialog marketing within the Call Center Association e.v. and our involvement in the "Bündnis für Ausbildung im Dialogmarketing" (Alliance for Training in Dialog Marketing), an alliance of associations, vocational schools and companies, is only one of many important pillars.

Our sports sponsorship in various clubs, such as the Hildesheim Invaders, is as much a part of T.D.M.'s tradition as the regular organization of running events in cooperation with local sports clubs.

Through these measures, T.D.M. strengthens its roots and values. The goal is a holistic concept to increase the quality of service as well as the satisfaction of the employees.

VI.2. Occupational safety

Our responsibility towards employees requires the best possible precautions against the risk of accidents.

This applies both to the technical planning of workplaces, facilities and processes and to personal behavior in everyday work. The working environment meets the requirements of a health-oriented design.

We have appointed safety officers and an occupational safety specialist to ensure compliance with these points.

VII. Complaints and notes

Each employee may make a personal complaint to their supervisor, trusted third parties, the Human Resources Department and/or AGG Officers, and also point out circumstances that indicate a violation of the Code of Conduct.

Once a complaint is made, the matter will then be thoroughly investigated. Retaliatory acts of any kind will not be tolerated, and appropriate measures will be taken where necessary. All records are kept confidential.

Employees should exhaust all internal options if necessary.

VIII. Implementation and control

The management of T.D.M. Telefon-Direkt-Marketing GmbH AG actively promotes the broad communication of the Business Conduct Guidelines and ensures their sustainable implementation.

Compliance with the law and adherence to the Business Conduct Guidelines are to be regularly monitored in all organizational units of T.D.M. Telefon-Direkt-Marketing GmbH.

These Business Conduct Guidelines were issued by the management of T.D.M. Telefon-Direkt-Marketing GmbH on August 16, 2021 and are effective immediately.

Management:



Carola Klug



Dietmar Klug