

CODE OF CONDUCT

WDR mediagroup

We are committed to clear compliance principles

Our company can only be successful if its employees, as well as its customers and the public, trust that the whole company will act in a responsible and considered manner.

Our continued business success and our reputation are based on this fair and transparent conduct.

We are committed to complying with legal requirements, internal regulations and standards and expect all employees to do the same in all their business activities.

We focus on continuous improvement of our compliance system

The management, the Compliance Officer and all employees support our existing compliance system and contribute to the continuous improvement.

If we identify breaches of statutory or internal company regulations, they are immediately stopped, carefully investigated and appropriately sanctioned.

In the interests of effective improvement, we pursue an active error culture.

We focus on effective corruption prevention

Our employees receive trainings for corruption prevention, in particular in connection with gifts, invitations and other benefits and the specific rules, we have established to ensure that we effectively counter corruption risks.

We consider money laundering prevention

In view of the risk of money laundering, we are also committed to appropriate money laundering prevention. Criminals must be prevented from concealing the illegal origin of money; this must not be possible in transactions with us.

We avoid conflicts of interest

Our employees are required to avoid situations that lead or could lead to a conflict between their personal interests and the interests of the company.

If someone finds himself or herself in such a conflict of interest when making personnel decisions or concluding a business transaction this must be reported to their executive.

Every paid or unpaid secondary employment must be reported and approved in advance.

We treat our employees with respect and comply with all labor law requirements

We comply with the Minimum Wage Act, the Working Hours Act and all other laws on the protection of employees. Our employees are remunerated adequately.

The health and safety of our employees in the workplace is of fundamental importance to us. We therefore take necessary measures in accordance with the Occupational Safety Act to prevent accidents and occupational illnesses in the best possible way.

We expect our employees to comply with safety regulations and to report safety deficiencies.

We value respect for each other

Starting with the protection of young people. We ensure compliance with all youth protection regulations. As a media company this is particularly important for us.

We do not tolerate harassment or other discrimination, derogatory comments, unwanted sexual advances or innuendos, or other conduct of a verbal, physical, psychological or visual nature. All employees have the right to be treated fairly, politely and respectfully, both by their supervisors and colleagues. The principle of equal treatment of all employees in the workplace applies without restriction.

No one may be harassed, discriminated against or disadvantaged based on their nationality, gender, faith, political outlook, disability, sexual orientation or any other characteristic referenced in the German General Equal Treatment Act.

We demand respectful interactions on social media

Company information may only be disclosed by the company management or on our official communication channels.

Unless specifically instructed otherwise, employees should refrain from engaging in public activities on behalf of our company.

We maintain political neutrality

We do not impose any requirements on our employees with regard to political views or activities. Employees may only engage in their own political activities outside the professional context and only in such a way that our company is not associated with them.

In a professional context, political neutrality is expected.

We observe data protection law

When collecting, processing and using personal data from employees, customers or other persons, we ensure confidentiality and compliance with all applicable data protection laws and rules.

The Management