

# Code of conduct and compliance @ itl

## Principles of conduct for working together

### 1 Foreword

Dear employees, customers, partners and suppliers,

Since itl Institut für technische Literatur was formed in Munich in 1982, it has grown into a company with international operations and branch offices and subsidiaries in Switzerland, Austria and Germany and a worldwide network of partners and suppliers.

We owe our business success not least to the responsible way in which our employees and management handle themselves. This has enabled us to become one of the leading service providers in the field of technical communication in German-speaking countries.

The reputation we have built up over the years with customers, business partners and in the market generally could be compromised by individual violations of the law. In our view, business results can only lead to sustained success in the long term if they are based on impeccable ethical business practices.

Each and every one of us is thus required to behave responsibly and to act in accordance with applicable law. We work on the basis of the constitutions and legislation of the countries where our branch offices are located (Switzerland, Austria and Germany) as well as the European Convention on Human Rights (ECHR), which has de facto legal force in these countries. In addition, we are committed to working fairly and in a spirit of partnership with all those within our sphere of influence (i.e. our own employees, our suppliers and partners, our customers and also our competitors and their employees).

This code of conduct provides all itl employees with binding guidelines that align with our mission statement. They also serve as a tool for ensuring trusting and productive relationships with our customers, partners and suppliers.

Kreuzlingen, September 2018

The management team

### 2 From the company's management – for all employees

The code of conduct described in this document has been issued by the company's management and declared binding. It represents the rigorous implementation of our mission statement and forms the basis for responsible and ethical conduct on the part of all itl employees, regardless of the area and location in which they work.

Our managers act as role models in terms of the company-wide implementation of the code of conduct. They must exemplify itl's values and actively intervene to counteract any behaviour that is not lawful or in line with our mission statement.

We always encourage all employees to seek confidential advice and assistance from their line managers or the contact persons listed in this document when making decisions where there are ethical or legal concerns or when they become aware of conduct in their working environment that they consider to be of concern.

## 3 Scope and effectiveness

### 3.1 Scope

The code of conduct applies to all employees of the itl Group at all its locations in Switzerland, Austria and Germany.

Where necessary, we will make this code of conduct available to our partners and suppliers who do not fall under its scope, as described above, and encourage them to put in place appropriate arrangements to ensure that the principles described in it are complied with.

We expect the same integrity from our partners and suppliers as we expect from our employees.

### 3.2 Effectiveness

itl works to ensure compliance with the code of conduct, taking into account the legislation and cultural factors in each of its locations.

This code of conduct is made available to our employees on the itl intranet and to our suppliers and partners on our website.

Employees are trained to comply with this code of conduct; communication with suppliers and partners takes place at face-to-face meetings, through the contractual stipulations of contracts for work and services and individual orders and through our website.

## 4 Fundamental values and principles

### 4.1 Responsibility for the reputation of our company

The reputation of our company is essentially shaped by the appearance, actions and behaviour of each individual employee. We all bear responsibility for this. Inappropriate conduct by even one individual can cause considerable damage to the itl Group.

It is therefore the responsibility of every employee, when performing his or her duties and appearing in public, to ensure that he or she does not damage the reputation of itl and instead conveys a positive image.

### 4.2 Compliance with human rights, fair working conditions

We see it as our duty to uphold and grant human rights as defined in Section I of the ECHR. We therefore decline to do business with companies that do not also comply with human rights. We will report any violation of human rights that comes to our attention or is brought to our attention.

### 4.3 Forced labour, child labour and young workers

We do not tolerate child, forced or compulsory labour and reject any form of exploitation, including human trafficking. The minimum recruitment age depends on the employment legislation of the country concerned.

### 4.4 Equal opportunities and prohibition of harassment and discrimination

We believe in employing people with different backgrounds and experience. Our employees are selected, hired and promoted exclusively on the basis of their qualifications and their professional and social skills. No one will be disadvantaged, favoured or harassed on account of his or her nationality, place of origin, skin colour, gender, religion or beliefs, disability, age or sexual orientation. We also do not tolerate any form of harassment of a sexual or any other nature or any form of discrimination against employees.

Every single employee is obliged to refrain from any discrimination and to treat people with respect and in the manner expected of a good colleague.

### 4.5 Management culture and working relationships

Every manager bears responsibility for his or her employees. Relationships must be based on mutual respect and openness. Line managers serve as role models, particularly when it comes to observing and implementing this code of conduct. Managers place trust in their employees, agree on clear, ambitious and realistic goals and grant employees personal responsibility and freedom to do their work.

Within the scope of their management duties, line managers prevent inappropriate conduct. They are responsible for ensuring that there are no rule violations in their area of responsibility that could have been prevented by appropriate management and guidance.

## 4.6 Working hours, remuneration and social benefits

Our working hours, including overtime, comply with applicable local laws governing working hours. Our remuneration and social benefits are competitive and comply with applicable national legislation, including in relation to minimum wages, overtime pay and statutory benefits.

## 4.7 Freedom of assembly/association, right to collective bargaining

Our employees can communicate openly with management about working conditions without fear of reprisals, intimidation or harassment. They are entitled, in accordance with the laws in force in the country, to freely associate, join trade unions, seek representation, join works councils and engage in collective bargaining.

## 5 Dealings with customers, partners and suppliers

### 5.1 Avoidance of conflicts of interest

It is important to us that our decisions are not influenced by personal interests. No employee should get into a conflict between personal interests and the interests of the itl Group while working for itl. Both the employee and the employee's line manager must pay due regard to this.

We select our suppliers and partners on the basis of appropriate, fact-based criteria. In other words, we come to a decision on the basis of quality, price, technical standards, qualifications, expertise and reliability. Commercial and staff-related decisions, consulting services or recommendations made by our employees must not be influenced by personal interests or relationships or be motivated by either material or immaterial advantages.

The same applies to our relationships with our customers: as a successful company, we have to persuade customers to use us on account of our products and services, not by providing them with undue advantages.

### 5.2 Combating bribery and corruption

We support national and international efforts to prevent competition being affected or distorted through bribery and reject all behaviour that is corrupt and harmful to the company.

None of our employees may exploit the business connections of our company for their own benefit or for the benefit of others or to the detriment of our company. This means, in particular, that none of our employees may grant or accept impermissible private benefits (e.g. money, material benefits or services) in the course of doing business that are likely to interfere with the making of a proper, informed decision. Situations that may lead to personal conflicts of interest must be avoided. This applies both to relationships with customers and relationships with suppliers.

### 5.3 Gifts and invitations

Moral standards and fair competition across all national borders are the basis for our success. Gifts and other benefits are common in everyday business life in many cultures. The exchange of gifts and invitations is legitimate as long as the value and frequency of these gifts do not exceed a reasonable level.

Details of how to deal with gifts and invitations are set out in the company regulations of itl AG (chapter 27 and appendix 1). All employees are obliged to inform themselves when they are uncertain before giving or receiving gifts or accepting or extending invitations.

If they have any questions, doubts about legality or well-founded suspicions, they should consult with their line manager, the company's management or the Compliance Officer.

### 5.4 Fair competition

We work according to the principles of the free market and fair competition. We pursue our business goals exclusively on the principle of merit and in compliance with the applicable competition rules. We expect the same from our business partners and competitors.

Agreements restricting competition, in particular with regard to prices, quotations, terms and conditions, production programmes, sales quotas or market shares, are taboo for us. It does not matter whether these are written agreements or informal discussions. Any conscious coordination of behaviour that might lead to a restriction of competition is prohibited.

## 5.5 Fair dealings with suppliers and partners

Our worldwide network of suppliers and partners includes individual suppliers and teams as well as smaller and larger partner agencies, which in turn have employees and suppliers. In addition to the different forms of company involved, the different legal and cultural environments also lead to increased challenges in terms of sustainability in procurement.

In order to meet these challenges and remain true to our mission statement, we deal with our suppliers and partners according to the same fair principles as our own employees.

Contractual stipulations form the basis for successful working relationships. Suppliers sign a contract for work and services and thus work in a success-driven manner and free of direction.

## 6 Handling of resources

### 6.1 Data protection and information security

We have implemented an information security management system (ISMS) in compliance with the IT baseline protection standards (IT-Grundschatz) of the German Federal Office for Information Security (BSI). We have been audited and approved in accordance with the VDA guideline based on DIN ISO 27001 and DIN ISO 27002.

We aim to implement the three pillars of secure information technology – confidentiality, integrity and availability – as well as possible, not just for our own company but along the entire value chain. The external Data Protection Officer of the itl Group and the internal Information Security Officer provide support to the specialist departments and contact persons.

### 6.2 Occupational health and safety

Our employees have a healthy and safe working environment that meets or exceeds applicable occupational health and safety standards. Our external occupational safety specialists (AUVA) ensure that all occupational safety regulations are complied with in order to avoid health hazards, minimise the risk of accidents and ensure trouble-free office procedures.

### 6.3 Environmental management

As a purely office-based operation, we do not require an environmental management system based on DIN EN ISO 14001. Nevertheless, we ensure that all waste generated in our offices is disposed of in an environmentally friendly manner.

## 7 Contact

We are always open to receiving questions, expressions of concern about possible misconduct or suggestions for improvement.

### 7.1 Contact person/option of making contact anonymously

In addition to line managers and company management, the Compliance Officer of itl GmbH is a suitable person to contact:

- ✓ Richard Pruckner, [richard.pruckner@itl.ch](mailto:richard.pruckner@itl.ch), +41 71 677 80 57

All contact persons are committed to absolute confidentiality wherever this is desired by those initiating the contact or necessary to protect them. The employee who reports an incident in good faith must not suffer any disadvantage as a consequence. However, if allegations are made with malicious intent or for personal gain, disciplinary action cannot be ruled out.

Reports to the Compliance Officer can also be made anonymously. To do so, please use the notification form on our website:

- ✓ [itl.ch](https://www.itl.ch) > [Company](#) > [Compliance](#)

Customers, partners and suppliers as well as employees can also use this notification form to contact the Compliance Officer, either anonymously or personally, as desired.