



TKD Code of Conduct

TKD Organisation

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Document Description

Document Name : TKD Code of Conduct
Number of pages : 12
Creation Date : 01.09.2022
Modification Date : 09.12.2025
Approval Date : 10.12.2025
Genehmigt von : Dennis Lahutta

Document Management

Validity : This document is valid from the date of approval
Owner : The owner of the document is the management
Document control : This document is reviewed annually

History

No.	Date	Author	Chapter s	Changes	Version
1	01.09.22	Patrick Schneider		Initial creation	1.0
2	15.09.22	Patrick Schneider		Adaptation in all chapters	1.1
3	10.12.25	Patrick Schneider		Adaptation in all chapters	1.2

Document Classification

Version	Classification
1.0, 1.1, 1.2	Public

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1 Introduction

The TKD Code of Conduct is a guideline for all companies of TKD (TKDeutschland GmbH, TKD Solutions GmbH, TKD Vertriebs GmbH and Möller Telekommunikation Solingen GmbH) - hereinafter referred to as TKD - and for this reason applies equally to all persons within these companies. In detail, it is aimed at management, managers and all our employees, as well as suppliers and partners. The TKD Code of Conduct is the basis of the jointly developed claim on ourselves to live up to the following principles and values. In addition, it is our obligation to always maintain a trusting and respectful relationship with partners, employees and customers externally.

Commitment of the managing directors

It is our responsibility to act socially, sustainably and economically at all times. As a company, we aim to conduct our business in accordance with all ethical and moral principles and to maintain fair competition in all markets in which it operates. This includes we, Managing Directors of the TKD companies, compliance with applicable laws and acceptance of restrictions of competition.

Implementation and enforcement

TKD, as a company and in the form of all employees, is committed to making all necessary efforts to live up to the principles and values described in the TKD Code of Conduct.

10.12.2025



2 Compliance with applicable law

The Code of Conduct is based on the self-evident observance of all applicable laws and regulations - within the framework of all business efforts.

We expressly point out that a violation of applicable laws or regulations will have serious consequences

such as criminal prosecution, labour law measures, damages or reputational damage - both for the company and for the Employees.

TKD investigates all indications of violations. Violations are detected, measures for future prevention are implemented and appropriate consequences.

Within TKD, managers (people with budget or personnel responsibility) in particular are obliged to implement the basic

Know laws, regulations and internal company rules that are relevant to their area of responsibility.

In individual countries, business areas or markets or towards business partners, there may be stricter regulations or laws than

those set out in the TKD Code of Conduct. In the event that we encounter such increased requirements, the

stricter rules. If there are doubts about the legal appropriateness during the decision-making phase, it is necessary to

expressly requires a contact person listed in Section XXII to be notified.

On a case-by-case basis, it is decided whether the decision will be approved internally or whether TKD's external legal advice will be consulted is drawn

3 Open debate

Within TKD, we maintain an open and direct discussion of concerns and risks. The aim is to prevent misconduct at an early stage.

identify and correct. TKD encourages all employees to think freely and critically - with the opportunity to consult with each other at any time.

critical and risky issues to superiors, up to and including management.

TKD's managers are instructed to promote open discussion and to follow up on employees' comments without prejudice.

We do not tolerate reprisals or intimidation attempts against employees who misconduct in good faith at any time. reported.

In this context, the term in good faith is defined as follows: The person making the report is convinced that the representation described by him or her

corresponds to the truth - it has no relevance whether this account is confirmed on later viewing or on follow-up

or not. False reports or reports with the aim of harming an internal or external person represent a dramatic compliance violation and entail consequences under employment law.

If employees encounter a lack of attention for their concerns, there is always the possibility to report their concerns to a

contact person - who is named in section 22 of the TKD CoC.

4 Respect, Trust & Equality

TKD is expressly in favour of a trusting and respectful

dealing with all persons. Every person has a right to a dignified, respectful and fair treatment.

We stand for diversity, equity and inclusion and enable the

employees a way of working characterized by tolerance and respect. Any form of sexual harassment, racism, bullying, discrimination or

further psychological and physical violence is not tolerated at TKD and inevitably entails the corresponding consequences.

Prohibition of discrimination:

Any kind of discrimination, including on the grounds of nationality, origin, sexual orientation and all the rights listed in the prohibition of discrimination

Reasons are not tolerated at TKD.

5 Conflicts of interest

All TKD employees may be faced with the challenge of having to make business decisions in their day-to-day work, which ones represent a conflict of interest between the business interest and the personal interest. Such conflicts of interest fuel

the risk that essential decisions can no longer be made impartially and in the interests of the company.

Every employee who can identify a conflict of interest in himself or herself is obliged to inform the supervisor or management

- this is the only way to bring about a quick clarification.

6 Protection of company assets

TKD employees handle company assets responsibly, e.g. products, work equipment, IT equipment or intellectual property.

The company's assets will be used exclusively for the intended business purposes and will not be used at any time for personal purposes.

Any form of fraud, embezzlement, theft, embezzlement and tax evasion is prohibited, regardless of the

whether this damages company assets or the assets of third parties.

7 Human rights

We respect the human rights, personal rights and dignity of our employees and all third parties.

TKD respects the rights to freedom of association in accordance with applicable laws and regulations. Forced labor, child labor,

all forms of modern slavery and human trafficking as well as any form of exploitation are prohibited at TKD and we pay attention to a

strict compliance with relevant laws.

8 Fair and healthy working environment

TKD adheres to all regulations to ensure fair working conditions.

This includes all regulations on fair pay, working hours as well as the protection of privacy.

The remuneration at TKD corresponds to the statutory requirements in every area minimum requirements, is consistent and customary in the market. The wage of the workers

always corresponds to a market-oriented and adapted to working conditions

adjusted remuneration.

TKD insists on compliance with all applicable laws and regulations on the occupational safety. Health at work is also one of the cornerstones of a healthy and risk-free working environment.

Occupational safety is one of the cornerstones of a healthy working environment. Detailed information can be found in the Occupational Safety Directive on

9 Relationships with business partners

In the context of all business relationships, our business partners (e.g. suppliers, customers, sales partners or service providers) expect that:

You can rely on all TKD companies to the same extent as a legally compliant business partner.

It is therefore considered an essential part of our obligation that we are at all times aware of the contractual framework of the partnership and are aware of it.

Checking the identity and integrity of all business partners is an essential part of any partnership. To the same extent, explain

We are also willing to have audits carried out by business partners.

If, in the context of the cooperation, regardless of the duration of the partnership, inappropriate or even illegal behaviour on the part of the of the partner, we seek advice from the management or the legal department.

In the Supplier Code, TKD has already committed itself to always making its purchasing decisions on the basis of the following criteria:

Quality / Price / Service / Reliability / Availability / Performance of Contract / Energy and Resource Efficiency as well as Environmental Compatibility

In TKD's Supplier Code, both we and our suppliers have entered into the obligation to ensure that all applicable economic embargoes, sanctions lists, and anti-terrorist financing rules and measures.

TKD observes its obligation to prevent Money Laundering.

10 Protection against corruption and bribery

We, as a company, reject any form of bribery and corruption, whether of public officials or in dealings with business partners,

. Invitations or gifts that employees receive as a benefit are permitted to an appropriate extent - provided that that they are directly related to advertising measures or serve to promote a business relationship or to promote products or services.

Any form of benefit may only be accepted or granted to a business partner if it is granted to a legitimate business partner.

purpose and do not constitute part of, or even consideration, an unlawful advantage. All employees are obliged to

acceptance and/or awarding of gifts or invitations, the internal regulations with regard to the approval requirements of the TKD

. TKD employees refrain from any kind of concealment of benefits that could create corruption risks.

11 Fair competition

In all countries in which TKD maintains business relationships, any form of collusion with competitors, suppliers, and

Distribution or trading companies that impair fair competition are prohibited and can be prosecuted.

As a company, we reject any form of unfair competition and report any attempt to the relevant authorities.

12 Dealing with political institutions and authorities

TKD does not grant gifts in kind to public officials and refrains from inviting public officials. In the event of official inquiries of any kind, the management must be involved.

TKD does not provide any support in the form of donations or services to parties, politicians or lobbyists, does not exercise any political influence and is also not listed in any lobby list.

13 Data protection

TKD operates a certified data protection management system (PIMS) in accordance with ISO/IEC 27701:2019 as an extension of its information security management system (ISMS) in accordance with ISO/IEC 27001. We maintain an up-to-date processing record, conclude order processing agreements with our service providers and assess data protection risks according to a risk-based approach. As a processor, we also meet the applicable requirements. We immediately report data breaches to the competent supervisory authority; we ensure that our certification is maintained through regular audits.

14 Use and security of IT systems

In everyday business, IT systems are regularly used and data is processed. Suitable security precautions (passwords, approved technologies and licensed software) are required to ensure the protection of intellectual property and personal data. Failure to comply with necessary security measures can have serious consequences, such as data loss, theft of personal data or copyright infringement.

Because digital information spreads quickly and can be easily duplicated and is virtually indestructible, we pay careful attention to the content of emails, attachments, downloaded files and stored voice messages.

We undertake to use the IT systems provided by the Company for the performance of business tasks and not for personal purposes that are inappropriate or improper.

15 Insider trading

Insider trading is prohibited and will be prosecuted. For employees of TKD, the use of inside information in trading, as well as the disclosure of insider information to others for the same purposes, is prohibited. Insider information is information about circumstances that are not publicly known, which, if they become known, can significantly influence the price of securities or similar financial instruments, or their market. Examples of such circumstances may include, but are not limited to, increases in profits and slumps, major orders, plans to merge or take over a company, significant new product developments or personnel changes in corporate management.

The scope of insider trading regulations varies from country to country. Employees who are confronted with such situations should seek advice and support from the Legal Department.

16 Information about products and services

We always provide truthful information regarding our products and services, as well as those of our partners.

False information and misleading information about products and services can cause damage to both our customers and our reputation. This contradicts our principles and is inadmissible.

17 Financial Integrity

TKD documents for business transactions must be correct and legally compliant. TKD records all business transactions, assets and liabilities - depending on the company's affiliation.

We refer to careful handling of all business processes – proper documentation and storage of documents must be ensured. We expect the highest accuracy and completeness as well as a sense of responsibility in all business processes. Financial accounting documents must not contain false or misleading additions. TKD fulfils your tax obligations and complies with all tax law regulations – if you have any questions, please contact TKD's financial accounting person.

18 Confidentiality and communication

Confidential information is non-public information that is intended only for a limited group of people and is not intended for the purpose of internal distribution or publication. This includes, but is not limited to, documents, reports, contracts, financial data, human resources information, investigations, litigation, court records, creative works, intellectual property, and business or product plans.

Discussing confidential information in public or disclosing information about the company without authorization, or

its customers to third parties constitute a violation of confidentiality obligations and can, for example, constitute violations of antitrust law.

In particular, employees who have access to particularly confidential information are obliged to comply with strict confidentiality, including internally.

When using social media, we are aware of our responsibility for the reputation of the company, do not give any

confidential or sensitive information of the company and respect the privacy of employees as well as our

Business partners.

TKD employees are provided with comprehensive, transparent and up-to-date information about their company, taking confidentiality into account

19 Decision-making guide

If employees are unsure whether a decision is in line with the requirements of the Code of Conduct in an individual case, employees check by asking the following questions.

If you can answer "yes" to each of these questions, the decision is probably justifiable.

- Would I be able to defend my decision to third parties without any problems?
- Can I make the decision in the best interest of the company and free from competing interests of my own?
- Can I reconcile the decision well with my own conscience?
- Have I taken into account all the relevant concerns from my point of view and weighed them appropriately?
- Can I assume that my decision will be within the framework of the legal and internal requirements?

If doubts remain with regard to any of these questions, employees should contact one of the contact persons listed in section 22.

20 Raise concerns and report violations

Concerns about behaviour in the workplace can often be addressed in constructive dialogue among those affected or with local contact persons. However, for certain issues, especially those involving illegal business practices, it may be better to address them confidentially outside the local work environment.

Employees who report actual or suspected misconduct in good faith must not be disadvantaged as a result

(see Section III. "Open debate"). The processing of information respects the rights of all interested parties and ensures fairness, appropriateness, confidentiality and a transparent process when deciding on disciplinary measures.

The following contact points are available to both employees and third parties.

The contact person

You can contact people in your local work environment to ask questions about this Code of Conduct or to report violations of the Code of Conduct or Compliance Guidelines.

These are, for example:

- Your Supervisors
- Your management
- Your Compliance Officers
- Your HR, legal or finance department
- Your external ombudsperson (whistleblowing proceedings)

The contact details can be found on the last page.

21 Reporting obligation for material compliance violations

Managers and employees who have a special responsibility to ensure compliance due to their position or position on boards are obliged to report any specific

indications or initial suspicion of a material compliance violation to a suitable department without delay. All employees are called upon to do so.

The reporting obligation includes, for example:

- white-collar criminal acts such as corruption, fraud, embezzlement, theft, embezzlement,
- violations of antitrust law or foreign trade law,
- the violation of human rights, sexual harassment or violations of discrimination laws,
- Violations that could lead to the action of a regulatory or law enforcement authority (e.g. supervisory authority, public prosecutor's office).

If employees are unsure in individual cases whether a compliance violation must be reported, the compliance officers should and employees will receive the support they need.

22 The contact person

Compliance Officer:

For identified cases of human rights violations, sexual harassment or violations of discrimination laws.

Torlée, Barbara

compliance@tkdeutschland.de

Sustainability Officer

For identified environmental risks

Schneider, Patrick

csr@tkdeutschland.de

Compliance Officer:

For identified cases of corruption, fraud, embezzlement, theft, embezzlement, violations of antitrust law or foreign trade law.

Lahutta, Dennis

legals@tkdeutschland.de

Data protection officer:

For identified cases of information and/or data breaches

Höhnel, Cynthia

datenschutz@tkdeutschland.de

Ombudperson – Whistleblowing

External and anonymous contact person for employees, customers and partners to report grievances and misconduct.

The registration form can be found on our website at
www.tkdeutschland.de/hinweisgeberschutz

