



Made for minds.

Code of Conduct

Our values. Our attitude. Our actions.

“ All of us at DW share a common vision: freedom, upholding of human rights and high ethical standards, democracy and the rule of law, openness to the world, tolerance and transparency towards the public.

Our values live on

Dear Colleagues,

Deutsche Welle (DW) reaches more people worldwide than ever before, enjoying ever greater credibility and high esteem as an independent voice. We want to inform people — especially where they are subject to censorship and propaganda. We promote access to free information and freedom of expression around the world.

All of us at DW share a common vision: freedom, upholding of human rights and high ethical standards, democracy and the rule of law, openness to the world, tolerance and transparency towards the public. That is what we are committed to. This is reflected in the journalistic content we offer and the DW Akademie's development policy projects and educational programs, but also in the daily interaction of a staff from 60 nations.

As a globally operating media company with a public mandate, we have a special responsibility to users, project, sales and business partners, society and the environment. This Code of Conduct describes how we perceive these internally and externally.

We practice the values and principles, norms and standards that we convey and promote around the world both at DW itself and in cooperation with our partners. This is expressed in our Code of Conduct. As the overriding Code of Conduct, it summarizes the binding principles that guide our daily actions and dealings with one another. Further basic principles are the DW Leadership Values, which are now implemented throughout the company. The Code of Conduct is essential for maintaining our reputation and success, both here in Germany and throughout the world. It is intended to sensitize all those working to fulfill our mission at DW to the significance of these principles and existing internal regulations and the importance of complying with them. The Code of Conduct is binding for all employees of Deutsche Welle and its subsidiaries.

Yours,

Peter Limbourg
Director General



“ We use our
diversity for our
mutual success.

What sets us apart

Our self-image—Unbiased information for free minds

Our mission: As an unbiased, German media organization, we provide news and information to people worldwide, giving them the freedom to make up their own minds.

We are *Made for minds*. In dialogue with our users and partners, we communicate new perspectives based on reliable information to critical minds worldwide. At the same time, we give people free access to the tools of learning. We help them to form their own opinions freely and independently and to express them freely, thereby shaping open, democratic societies together.

These are our declared goals, but our approach to achieving them is just as important: we have clear values that we share and clear expectations of ourselves and of the way we interact with each other. They run like a common thread through our products and services and determine our daily decisions and behavior.

With a clear commitment to freedom

Freedom, democracy and human rights are the cornerstones of our journalistic and development message and profile. We advocate the values of freedom and, wherever we are, take independent and clear positions. Our clear stance and authenticity set us apart from other providers.

Open dialogue, globally networked

The reality of people's lives and their needs are at the heart of our actions in both our journalistic range of services and those of DW Akademie. Open-minded, globally and regionally networked, we are in dialogue with people all over the world. Our range of products and services offers new perspectives whenever and wherever they are needed. We promote constructive exchange and treat all people with respect—always and everywhere.

Profound knowledge, diverse perspectives

Our diversity and expertise are our greatest assets. We look at the world with curiosity, take courageous new paths, ask critical questions and provide substantiated, independent answers. Our multilingual teams, at home in more than 60 countries around the world, together with our users and partners, create attractive content of the highest quality and relevance. We promote the development of free media systems, provide access to information, and set standards for education and independent journalism. We share our ideas and use our diversity for our mutual success.

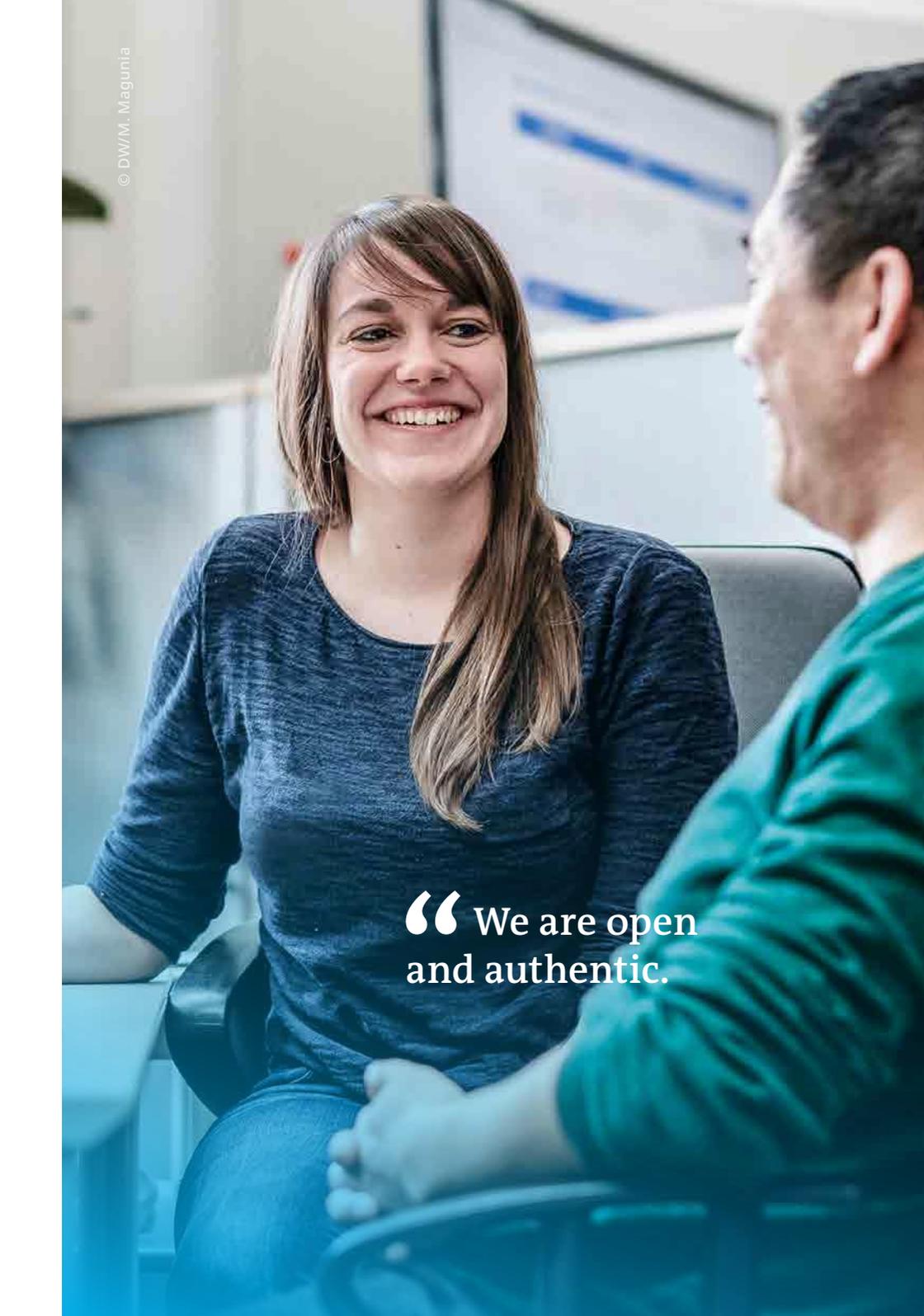
These core values form the basis for our rules of conduct—ensuring productive cooperation and mutual respect.

Our adherence to the law and regulations

As employees, we are familiar with and comply with the fundamental laws, collective agreements, DW internal directives and, in particular, the regulations defined in the DW Handbook that are relevant to our areas of responsibility. These regulations continue to apply and are not in any way invalidated by the Code of Conduct.

“ We are familiar with laws that apply to all of us.





“ We are open
and authentic.”

Our way of dealing with each other

Respect

- We work together in an honest and respectful way.
- We respect every person regardless of their ethnic origin, gender, religion or disability, age or sexual identity.
- We value different opinions.
- We maintain a “zero tolerance” policy concerning sexual harassment in the workplace.
- We will not tolerate abuse of power in any form.

Transparency and cooperation

- We share information openly and promptly.
- We work together beyond location, management and department boundaries.
- We are open to new ideas and innovation. Respect, transparency and cooperation, trust, loyalty, a constructive feedback culture as well as a leadership and working culture in accordance with our agreed goals are the cornerstones of our work.

Trust

- We are open and authentic.
- We are reliable and are faithful to our commitments.
- We create a working atmosphere that enables open communication and critical feedback.

Constructive feedback culture

- We create a constructive feedback culture by reviewing existing practices, seeking new approaches and reflecting on our own conduct.
- We use mistakes as an opportunity for improvement.
- We manage and resolve conflicts.

Loyalty

- We uphold the values and strategies of DW.
- We actively participate in shaping change processes.
- We are committed to honesty and integrity.

Goal-oriented action

- We work independently to achieve DW's goals.
- We use new ideas to inspire and encourage innovation.
- We are success-oriented.

Our interaction with partners and third parties

Intellectual property

- We respect and protect the intellectual property of third parties in accordance with relevant legislation.

Conflicts of interest

- We make our business decisions in the interest of DW. We are not influenced by private interests and relationships.
- We actively disclose possible conflicts of interest.
- We make sure that our business and project partners have no conflicts of interest.

Corruption and the granting of advantages

- We reject any form of corruption and avoid any appearance of corruption.
- We refrain from any form of favor, bribery or other forms of personal gratuity.

Gifts and other gratuities

- We reject gifts, invitations and (journalist) discounts that call our independence into question and could lead us to take un- or non-objective decisions about business matters.
- We accept other gifts, invitations and benefits only with complete transparency and in compliance with all applicable laws and internal regulations.
- We offer gifts and invitations only within reasonable limits. The question of what is appropriate primarily depends on Germany's point of view, albeit taking into account the point of view of the target country.¹

Procurement and tendering

- We procure products, services and productions on the basis of quality, economy and competition in accordance with applicable laws and in-house regulations. Purchasing decisions are based on suppliers' objectively verifiable product and service qualities. Agreements which are detrimental to competition are not permitted.

¹ Further details can be found in the Anti-Corruption Policy.



“ We make business decisions in the interest of DW.

Our handling of information

Confidentiality

- We handle business secrets and confidential information with due care. This applies to editorial content as well as to all other information not suitable or intended for disclosure.
- We always make confidential information, even if it is available in digital form, accessible only to those employees who require it.

Data protection

- We only collect necessary data (data economy).
- We ensure strict confidentiality in the legally permitted collection, use and processing of personal data and thus protect the data from misuse. When deciding where to store data and whether to encrypt it, we respect its confidentiality.

IT and information security

- When working with IT systems, we observe the rules and regulations of IT and information security in order to prevent misuse of these systems, both internally and externally.
- We are aware of the threats to DW's information security that can arise from the careless use of IT systems and act accordingly.



“ We handle
all data with
due care.



“ We make it clear whether we are acting or working as private individuals or as employees of Deutsche Welle.



Our communications with the public

- We do not independently answer enquiries from journalists and media companies concerning DW as a whole, but forward these to our Corporate Communications department, which coordinates and manages the flow of information.
- In all communications, we make it clear whether we are acting or working as private individuals or as employees of Deutsche Welle.
- In order to avoid possible conflicts of interest, we only engage in outside activities that could have a possible publicity effect within the framework of our internal approval procedure.

Our safety and sustainability standards

- We comply with the guidelines for occupational health and safety.
- We observe our regulations for deployments in crisis areas.
- We behave in a sustainable manner, in particular by using available resources in an environmentally friendly and economical manner and ensuring recyclability.
- We ensure that our actions have no unwanted negative effects on our partners (*do no harm*).





“ We act in a sustainable manner.”



Our handling of company property

- We handle our work equipment and other property of Deutsche Welle with due care.
- We make the results of our work available to Deutsche Welle.
- We observe the principles of efficiency and economy in the use of work equipment.

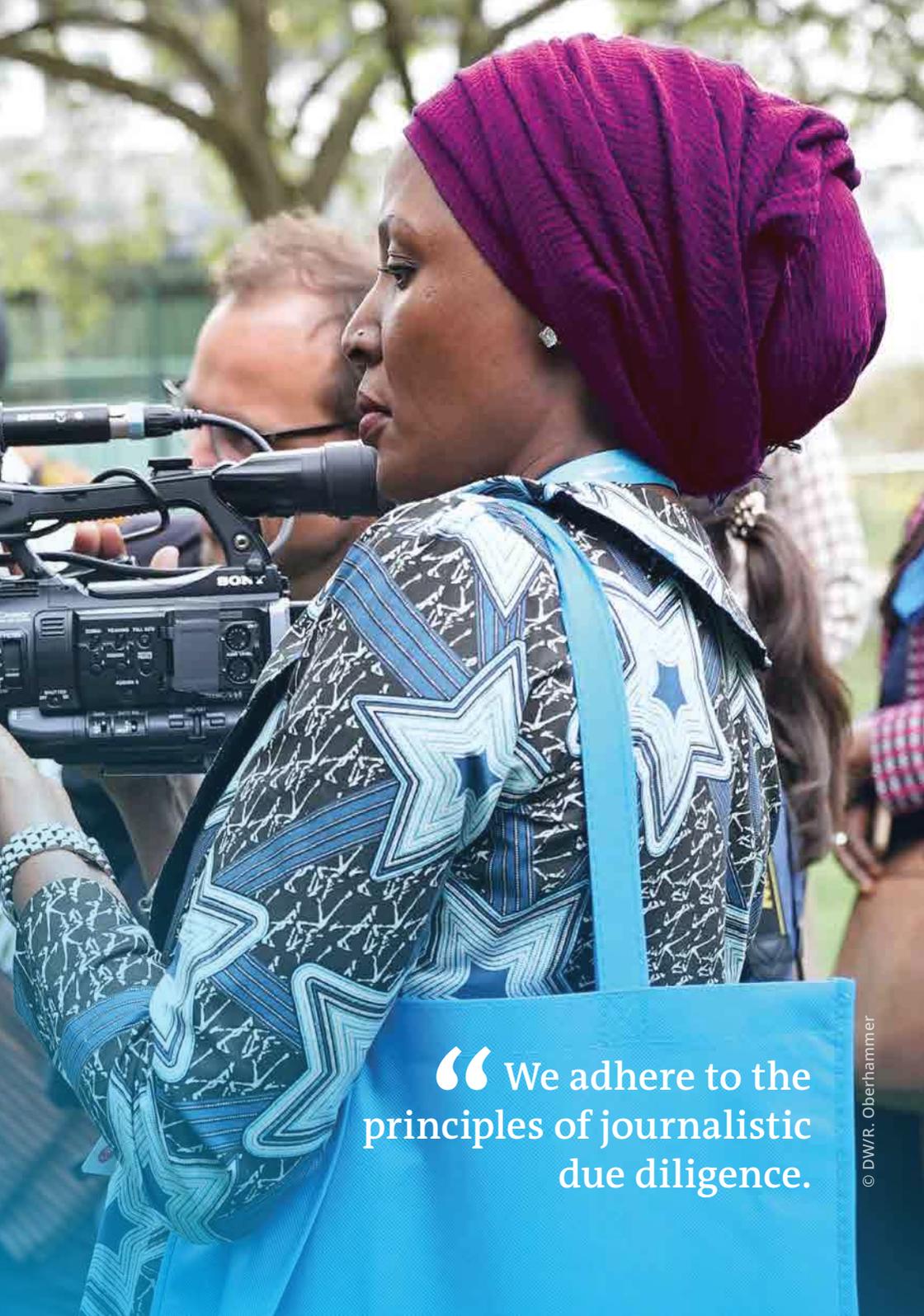
“ We observe the principles of efficiency and economy.



Our editorial principles and standards

- We are aware of our responsibility to the public as opinion influencers and are accordingly diligent.
- We carry out our duties in accordance with the DW Act.
- We work in an editorially and journalistically independent manner and are not influenced by the interests of third parties.
- We respect different opinions as regards plurality and diversity of views.
- We adhere to the principles of journalistic due diligence, conduct thorough research and report in an informed and balanced fashion.
- We adhere to the rules governing the separation of advertising and editorial content.
- We are committed to respecting privacy and to the correct handling of information, opinions and images.





“ We adhere to the principles of journalistic due diligence.

Guidelines for the implementation of the Code of Conduct

The following questions can help you comply with the Code of Conduct

- Am I observing the relevant legal and organizational regulations?
- Have I coordinated a decision with any other involved parties in advance and in good time?
- Am I making my decision solely in the interest of DW and independently of my own interests?
- What is the external impact of my decision? Would the decision stand up to third-party evaluation? Will Deutsche Welle's good reputation be maintained?
- Can I reconcile my decision with my own conscience?

If you can answer all questions with a clear "Yes", your decision should be in line with the requirements of the Code of Conduct. But if you are unsure, the following people can help you.

Our contact persons for any questions

If you are unsure or have any questions regarding compliance with the Code of Conduct, please contact your senior management or the Compliance Officer.

Our contact persons in case of infringements

The Code of Conduct is a **binding** set of rules for all Deutsche Welle employees.

If you notice a possible violation in our company, it is important to first address the person(s) who you think is behaving irregularly directly.

Depending on the type of breach, you may also report the incident to your manager or Compliance Officer Annelie Gröniger:

annelie.groeniger@dw.com
+49.228.429-2105

Of course, you can also get in touch with other relevant contact persons, in particular staff representatives or, if necessary, the External Corruption Officer or the contact persons responsible for protection against sexual harassment.

In any case, you can assume that your report will be treated with the utmost confidentiality.

Measures taken by DW in the event of infringements

In the event of violations, DW will take appropriate measures for clarification. This means that the meaning of the Code of Conduct will first be explained to the employees involved in a joint discussion in order to achieve a change in behavior in line with the regulations contained herein. Infringements may also lead to a change in one's employment status within the framework of the relevant regulations and in accordance with labor laws.

