

DEKRA e. V. and DEKRA SE

# Compliance Guidelines.

Our policy regarding  
legal conduct.





Dear colleagues,

It is our purpose to make the world a safer place. To achieve that mission, DEKRA relies on the trust and the confidence of our members, clients and society. The central factor is the performance and the integrity of each of us.

This confidence depends to a large extent on how we all conduct ourselves as employees and executives of the DEKRA Group no matter where we are located.

Our core task is centered on the common wish for safety. Our neutrality, reliability and integrity and our global commitment to conducting only "clean" business allow us to meet that goal.

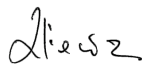
As well as constituting binding minimum standards, our DEKRA Compliance Guidelines provide orientation for all of us when it comes to complying with laws, legal standards and ethical principles on all continents.

We are all ambassadors for DEKRA, both internally and externally. This is why it is important that we work together to realize our principles of conduct systematically and responsibly, as this is the only way to appropriately meet the goal of ensuring greater safety while maintaining our superb reputation.

The Management Board



**Stefan Kölbl**  
Chairman of the  
Management Board  
DEKRA e.V. and DEKRA SE,  
CEO



**Stan Zurkiewicz**  
Member of the  
Management Board  
DEKRA SE,  
COO, Regions and Sales



**Wolfgang Linsenmaier**  
Member of the  
Management Board  
DEKRA e.V. and DEKRA SE,  
CFO, HR and IT




**Ivo Rauh**  
Member of the  
Management Board  
DEKRA SE,  
CTO, Services and Innovation



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“For me, compliance means that I always act in a responsible way, wherever I am.”

Stefan Kölbl, Chairman of the Management Board  
DEKRA e.V. and DEKRA SE

# 1 General conduct guidelines

## 1.1 Compliance with the law

Compliance with the law and the legal system is a fundamental requirement in our company. All employees must abide by the laws and regulations of the legal system within which they operate. Offenses against the law must be avoided in all circumstances. If an employee breaks the law he or she will face disciplinary proceedings for violating the terms of their contract of employment, independently of the sanctions imposed by law.

## 1.2 Responsibility for DEKRA's image

Every one of us plays a significant part in upholding DEKRA's image through our appearance, our actions and our conduct. All employees are required to be aware of, and to uphold, DEKRA's image in society at large.

## 1.3 Respect and integrity

We respect the personal dignity, privacy and individual rights of all people, regardless of gender, nationality, culture, religion or skin color. We do not tolerate any discrimination or any sexual or other personal harassment or offence. We are reliable partners and we only make promises that we can keep. These principles apply both to our internal collaboration and to our conduct towards external partners.

## 1.4 Leadership and responsibility

All managers are responsible for the employees under their care. Managers should set an outstanding example in terms of personal conduct, performance, openness and social skills. They should set clear, ambitious and realistic goals, and they should lead with trust, allowing employees as much autonomy and freedom as possible. They should be available to employees to discuss both professional and personal concerns.

Every manager has organizational and supervisory duties to fulfill and is responsible for ensuring that no infringements of the law occur within their sphere of responsibility that might have been prevented or hindered by appropriate supervision. Even when individual tasks are delegated the manager retains this responsibility.

All managers must observe the following rules in particular:

- Managers must select employees carefully, ensuring that they have the appropriate personal qualities and specialist expertise. This duty of care increases with the importance of the role the employee has to fulfill.
- Managers must allocate tasks precisely, fully and definitively, especially regarding compliance with legal requirements.
- Managers must ensure that compliance with legal requirements is monitored on an ongoing basis.
- Managers must clearly inform employees that breaking the law is unacceptable and will entail disciplinary proceedings.

**“Our compliance guidelines determine the framework for our day-to-day actions and thus ensure our safety.”**

Wolfgang Linsenmaier, Member of the Management Board DEKRA SE

## 2 Relations with business partners and third parties

### 2.1 Fair competition

Businesses may only grow and develop on a basis of fair competitive practices. The requirement of integrity also applies to the competition for market share. Every employee is duty-bound to observe the rules of fair competition. In individual cases it can be difficult to assess the position relating to anti-trust and competition laws. In cases of doubt the Chief Compliance Officer should be called in to provide guidance on the individual case.

### 2.2 Offering and granting benefits

We compete for contracts on the basis of the quality and price of our innovative services. No employee may offer or grant unjustified benefits connected with business activities – directly or indirectly – in the form either of cash payments or of other benefits. Promotional gifts should be carefully selected so as to ensure that no impression of dishonesty or impropriety is created. In cases of doubt the recipient should be asked to obtain prior permission to accept the gift from his/her superior. Gifts may not be offered to civil servants or other officials in any circumstances. Employees negotiating contracts with consultants, agents and similar third parties should ensure that these contracts do not offer or grant unjustified benefits.

### 2.3 Requesting and accepting benefits

Employees may not use their professional position to request, accept, procure or be promised benefits.

### 2.4 Awarding contracts

Employees responsible for awarding contracts must observe the following rules in particular:

- Employees must declare any potential conflict between personal interests and the performance of their professional duties to their superior.
- Employees should not discriminate unfairly for or against suppliers who are competing for contracts.
- Invitations from business partners may only be accepted when the occasion and scope of the invitation are appropriate and when declining the invitation would be considered impolite.
- No employee may enter into private contracts with companies with whom they have business dealings if they may gain a personal advantage as a result of doing so. This applies in particular where the employee exerts direct or indirect influence, or can exert such influence, on awarding contracts to the same firm for DEKRA SE or another group company.

## 2.5 Donations

DEKRA is aware of its social responsibility and so makes donations of money and goods for education and science, for art and culture and for social purposes. The company receives requests for donations from a wide variety of organizations, institutions and groups.

The following rules apply to making donations:

- Requests for donations from private individuals should be refused in all cases.
- Payments into private accounts are not permitted.
- Donations should never be granted to persons or organizations that may be detrimental to the company's reputation.
- The donation must be transparent. The recipient of the donation and the specific use by the recipient must be clearly identified. The reason for the donation and the purpose for which the donation will be used must be accountable at all times.
- Donations should be tax-deductible.



## 3 Avoiding conflicts of interest

The company considers it important that its employees not encounter conflicts of interest or loyalty in the conduct of their professional activities. Such conflicts can arise if an employee works for or has shares in another company. The following rules therefore apply to us all.

### 3.1 Ban on competition

Running a business that is fully or partly in competition with DEKRA SE or its group companies is prohibited.

### 3.2 Holding shares in unlisted companies

Employees are not permitted to hold shares – directly or indirectly – in unlisted companies that are fully or partly in competition with DEKRA SE or its group companies.

### 3.3 Activities outside work

If employees wish to take on other paid employment they must notify their manager in advance in writing. The additional employment may be forbidden if it has a detrimental effect on the employee's working performance, or conflicts with their duties to the company, or if it might lead to a conflict of interests. The exceptions are occasional writing activities, lectures and similar occasional activities.





## 4 Using company equipment

The installations and equipment in offices and workshops (e.g. telephone, photocopier, PC including software and Internet/intranet, machines, tools) may be used only within the framework of the applicable works agreements and internal regulations. In no case may information be downloaded or transmitted that incites racial hatred or glorifies violence or other punishable acts or whose content is sexually offensive in the relevant cultural context.

## 5 Handling information

### 5.1 Records and reports

Accurate and truthful reporting is part of open and effective cooperation. The same equally applies to the relationship with employees, customers, business partners, the general public and all state organizations.

All records and reports that are produced internally or communicated externally must be accurate and truthful. In accordance with proper accounting principles, data records and other reports must always be complete, accurate, timely and system-compatible. The requirement of truthful reporting also applies in particular to expense accounts.

### 5.2 Confidentiality

Confidentiality must be maintained regarding internal company matters that have not been made public. This includes details relating to the organization of the company and its facilities, for example, as well as business, production, research and development transactions and internal accounting figures.

### 5.3 Data protection and data security

Access to the intranet and the Internet, the global exchange of information and dialogue, electronic transactions – all play a key role in the effectiveness of each individual and for the success of the business as a whole. However, the benefits of electronic communication also entail risks in terms of personal rights and data security. Effective protection against these risks is an important aspect of IT management, management responsibilities and the conduct of individual employees.

Personal data may only be compiled, processed or used insofar as this is necessary for clearly defined and legitimate purposes. High standards must be maintained in terms of data quality and technical protection against unauthorized access. The use of personal data must be transparent for those affected, upholding their rights to information and amendment and to challenge, block or delete the information as necessary.





## 6 Environment, safety and health

### 6.1 Environment and technical safety

Protecting the environment and preserving its natural resources are high-priority goals for the group. Environment-friendly design, technical safety and health protection are fundamental parameters in our work.

Every employee at his or her workplace must contribute to achieving exemplary performance in these areas.

### 6.2 Safety at work

Our responsibility towards employees and colleagues calls for optimum accident prevention measures. This applies both to the technical design of workplaces, facilities and processes and to safety management and personal conduct in our day-to-day work. The working environment must be designed in line with health and safety standards.

All employees must maintain a constant awareness of safety at work.

## 7 Managing complaints

Any employee can lodge a personal complaint, or report a suspected violation of the Compliance Guidelines, with their superior, with the Chief Compliance Officer or with another designated person or office. The matter will then be thoroughly investigated and the necessary measures will be taken as appropriate. All documents will be held in confidence.

**“Our integrity and commitment to compliance is not negotiable. It’s our statement of the standard that we will hold each other to, and how we show our customers that we are a responsible business partner.”**

Eric Labe, DEKRA North America





## 8 Implementation and control

The Management of DEKRA and its group companies works actively to promote knowledge and awareness of the Compliance Guidelines and ensures that they are implemented on an ongoing basis.

DEKRA has set up a group-wide Compliance Organization for this purpose, headed by the Chief Compliance Officer. The Chief Compliance Officer is responsible for developing, implementing, documenting and updating the compliance system and for monitoring it on a regular basis. He or she ensures that appropriate information and training is provided for employees and is available to advise all employees on specific issues relating to the Compliance Guidelines, offering ongoing support to all employees in dealing with ethical and legal challenges arising during their day-to-day work.

Compliance with the law and observance of the Compliance Guidelines must be monitored regularly in all group companies worldwide. This must be undertaken in accordance with the relevant national procedures and legal requirements.

DEKRA's internal audit team conducts regular checks to ensure that the Compliance Guidelines are properly implemented across all divisions and geographic regions and to ascertain whether there is any evidence of non-compliance.

## Contact



Chief Compliance Officer  
Ulrich Rothfuchs  
c/o DEKRA SE  
Handwerkstraße 15  
DE-70565 Stuttgart

Phone: +49.711.7861-2543  
Fax: +49.711.7861-1970  
E-mail: [ulrich.rothfuchs@dekra.com](mailto:ulrich.rothfuchs@dekra.com)

For further information about our Regional Compliance Officer please contact  
+49.711.7861-2773

DEKRA e.V. and DEKRA SE

Group Legal, Compliance  
and Data Protection

Handwerkstraße 15

70565 Stuttgart

Phone +49.711.7861-0

Fax +49.711.7861-2240

[compliance-report@dekra.com](mailto:compliance-report@dekra.com)

[www.dekra.com](http://www.dekra.com)