



*Made for minds.*

# Code of Conduct

Our values. Our attitude. Our actions.

**Living  
our  
values**

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 and there is a lack of differing points of view. That is where we also present controversial positions.

### **We promote access to free information and freedom of expression around the world.**

All of us at DW share a common vision: the idea of freedom, upholding of human rights, democracy and the rule of law, open-mindedness, tolerance and transparency towards the public. That is why we reject all forms of discrimination including sexism, racism and antisemitism. Germany's historical responsibility for the Holocaust is also a reason for which we support the right of Israel to exist. We are committed to these values. This is reflected not only in the journalistic content we offer and the DW Akademie's development policy projects and educational programs, but also

in the daily interactions of people from over 160 nations in all their diversity.

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 this responsibility 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 co-operation with our partners. This is expressed in our Code of Conduct.

As the overarching Code of Conduct, it summarizes the binding principles and standards of behavior that guide our daily actions and dealings with one another. Complying with the law is vital for us in everything we do. The Code of Conduct therefore ensures we will conduct all of our activities in a legal fashion, that the behavior of all DW employees adheres to the law and that our business practices are ethically irreproachable.

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 around the world. It is intended to sensitize all those working to fulfill our mission at DW to the significance of these principles as well as of existing internal regulations and to the importance of complying with them. The Code of Conduct is binding for all employees of DW and its subsidiaries.

As DW employees, we are all obligated to adhere to and live by the Code of Conduct and the behavioral guidelines contained therein. This applies in particular to the company's management and executives who, to a large extent, shape its corporate culture. Managers are role models. They must ensure that employees

know and understand the Code of Conduct. They also have the additional responsibility of taking action against any and all behavior that violates any laws that are in place or that is not in line with the behavioral guidelines or basic values of the Code of Conduct.

As a broadcaster that advocates freedom of speech and of opinion worldwide, we foster a climate within DW that accepts and tolerates justified dissent. We will investigate any violation of the Code of Conduct and take any action necessary, especially in terms of labor law.

Yours,

**Peter Limbourg**  
Director General

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**We all share  
a common  
vision.**

# The Code of Conduct

The Code of Conduct is based on and refers to all laws, collective bargaining agreements and internal DW regulations that apply to DW; and especially to those that are contained within the **DW handbook**. Of course, these rules and guidelines for behavior will continue to apply under the auspices of the Code of Conduct.

As employees, we are expected to take responsibility for familiarizing ourselves with these rules. Questions on individual rules and regulations can be directed to managers, compliance officers and to the respective function.

**We use our diversity to drive 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 cornerstones of our journalistic and development message and profile. We advocate the values of freedom and, wherever we are, take independent and clear positions, especially against any and all kinds of discrimination including sexism, racism and antisemitism. Due to Germany's history, we have a special obligation towards Israel.

## **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 in those of the DW Akademie. Open-minded, with global and regional networks, 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 160 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 values form the basis for our rules of conduct—ensuring productive cooperation and mutual respect.

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ideas and use  
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to drive our  
mutual success.**

# Our adherence to the law and regulations

With its guidelines for behavior, the Code of Conduct governs general interactions within DW and outlines the value system for our daily work, also in journalistic areas. Of course, applicable laws and company-specific regulations continue to apply under the auspices of the Code of Conduct.

Management and Executives are role models and are therefore obligated to contribute to compliance with the Code of Conduct.

DW expects its employees to pay special attention to the following points; violations will have consequences in terms of labor law.

## **Ban on discrimination as per the General Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz (AGG))**

Discrimination of any kind, such as sexism, racism and antisemitism as per the AGG, will not be tolerated, neither in our dealings with each other, nor in our offerings. We will not put at a disadvantage any employees, partners or other third parties with whom we come into contact in our business neither on antisemitic or racist grounds nor on the grounds of their ethnic heritage, gender, religion or worldview, disability, age

or sexual identity. We strictly reject bullying and sexual harassment. The spreading of insults and untrue claims against specific persons is also prohibited.

We have zero tolerance for the incitement to ethnic or racial hatred or illegal behavior such as the denial or relativization of the Holocaust.

### The limits of freedom of expression

We are aware that our freedom of expression ends when it crosses the line to bullying, sexual harassment and any other defamatory behavior such as making false claims, slander or libel.

We are also aware that freedom of expression does not apply to Holocaust denial or relativization.

As DW employees, we are obligated to maintain restraint in the content and form of our social media and other publications in both a professional and private context. This restraint is due to our responsibility to the values of DW and our duty of consideration and loyalty to DW as an employer and to other employees as stipulated in our employment contracts. With our position and our field of activity in mind, we are obligated to ensure our behavior outside of work in public takes a form such that it will not adversely affect the standing or the justified interests of DW. We will always and in every instance refrain from making any kind of discriminating—including sexist, racist and antisemitic—comments. These kinds of comments can have consequences in terms of labor law, including dismissal.

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.

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**Discrimination will not be tolerated, neither in our dealings with each other, nor in our offerings.**

# Our way of dealing with each other

## Respect

We work together in an honest and respectful way.  
We respect every person regardless of their 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 across locations, business units and departments.  
We are ready for 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 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 by reflecting on our own conduct.
- We use mistakes as an opportunity for improvement.
- We are convinced people can evolve and change their minds and ideas.
- We manage and resolve conflicts.
- We do not spread any untrue claims about DW representatives, managers and employees.

## **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.

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**We are open  
and authentic.**

# 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.

## **Business partners**

We use the DW Declaration of Values when selecting business partners.

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We make our  
business decisions in  
the interest of DW.

#### **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.<sup>1</sup>

#### **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.

<sup>1</sup> Further details will be set out in the Anti-Corruption Policy, which will be linked here.

# Our handling of infor- mation

## **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 make confidential information, even if 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 data with due care.**

# **Our communications with the public**

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We make it clear whether we are acting or working as private individuals or as DW employees.

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 DW employees.

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*).

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We act in a sustainable manner

# Our handling of company property

We handle our work equipment  
and other DW property with  
due care.

We make the results of our work  
available to DW.

We observe the principles of  
efficiency and economy in the  
use of work equipment.

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We observe  
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 and with the Code of Conduct.
- 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 and promote dialogue.
- 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 proper handling of information, opinions and images.
- We respect the DW Social Media Guidelines and the Journalistic Guidelines of the Editor-in-Chief.

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**We adhere to the principles of journalistic due diligence.**

# Guidelines for imple- menting the Code of Conduct

## **Consequences for violating the DW Code of Conduct**

In the event of violations of the Code of Conduct, DW will take measures to clarify and prevent any similar incidences in the future. Firstly, these measures will entail a discussion with the employee in question to explain the importance of the Code of Conduct with the goal of bringing about a change in that person's

behavior in regard to the rule that has been violated. The gravity of the violation will define which measures related to labor law are required and appropriate. If necessary, these could even include extraordinary termination of the employment or service relationship.

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

Am I observing 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 DW'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 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 DW employees.

If you notice a possible violation in our company, it is important to first directly address the person(s) who you think is behaving irregularly. Please contact us if you yourself have experienced a violation of the Code of Conduct.

Depending on the type of breach, you may also report the incident to your manager or Compliance Officer Annelie Gröniger:  
[annelie.groeniger@dw.com](mailto: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 be sure 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. These measures entail a discussion with the employee in question to explain the importance of the Code of Conduct with the goal of bringing about a change in that person's behavior in regard to the rules contained herein. It is however possible that violations will lead to measures within the framework of the relevant regulations and in accordance with applicable labor laws.

