

# winkler compliance



**CONDUCT – THAT WORKS**



Dear employees of the winkler Unternehmensgruppe,  
Dear customers and business partners,

Since Christian Winkler laid the foundations for today's winkler Unternehmensgruppe in his blacksmith's wagon shop in Stuttgart in 1901, our company has grown strongly. It now comprises over 40 locations in seven countries with around 1700 employees. Despite this strong growth, winkler has remained a family-oriented, medium-sized company with firm values.

As a company, we are aware of the responsibility we bear. Against this background, we place stringent demands on our products, the way we treat our employees, our customers and our business partners. These demands, coupled with individual and industry-specific advice, have made us one of the leading technical dealers and equipment suppliers for commercial vehicles, workshops and agriculture in Europe.

In order to uphold our values and standards in the course of qualitative and quantitative growth we have decided as a company to introduce compliance guidelines. This is intended to serve as a common thread and guidelines for ethical behavior and legal compliance.

The compliance guidelines complement and present our corporate mission statement with a focus on the values: humanity, conversation, reliability, drive strength and sustainability.

The management expects every employee, as well as all other members of the winkler Unternehmensgruppe, to adhere to the contents of the compliance guidelines. The aim is to pull together, to benefit from the advantages of good teamwork and to integrate colleagues, customers and business partners into a community.



Rüdiger Halm  
Chairman of the Board

## Contents

Definition and scope of the guidelines .....	3
Duty to inform.....	4
Fundamental business ethics.....	5
Interaction and communication with each other.....	6
Corporate responsibility .....	7
Dealings with business partners.....	8
Invitations, gifts, events.....	9
Work safety .....	10
Data protection .....	11
Environmental protection and sustainability.....	12
Compliance with guidelines.....	13

## Definition and scope of the guidelines

Compliance stands for the observance of laws and regulations, but also of corporate internal regulations. Furthermore, these guidelines help to communicate the culture and important values of the winkler Unternehmensgruppe both internally and externally.

However, the compliance guidelines are not just a summary set of rules, but also serve as a guide for all winkler employees in their day-to-day work. This means that our employees use the guidelines as a hand book in various situations and have an overview of central legal and internal regulations. Our employees also follow the rules set out here in their personal dealings with colleagues, customers and business partners.

The aim of the guidelines is to ensure a uniform understanding of the corporate culture, early risk identification and the prevention of potential damage.

If employees have any questions about these guidelines or require further information, they may contact their respective supervisors or our compliance contacts ([compliance@winkler.de](mailto:compliance@winkler.de)).

The winkler compliance guidelines applies to all employees and other members of the entire winkler Unternehmensgruppe. For better understanding, all groups are uniformly called employees.





## Duty to inform

Each winkler employee is responsible for knowing, understanding and complying with the contents of the compliance guidelines as well as the legal and internal requirements applicable to his or her tasks and, if necessary, obtaining further information in the event of any ambiguities.

At winkler, transparency is a top priority. Every employee has a right to information concerning both day-to-day business and planned corporate goals. Each winkler executive is therefore responsible for communicating and making available to employees any new information relating to the compliance guidelines or the points mentioned above.

## Fundamental business ethics

A successful company needs values that are lived by all employees. The values of the winkler Unternehmensgruppe are anchored in our mission statement.

Besides these, the following topics are essential for successful collaboration:

**No discrimination:** All employees, customers, business partners and other persons who come into contact with winkler are treated equally. Discrimination on the grounds of gender, disability, ethnic origin, religion or belief, age or sexual identity is strictly prohibited.

**Avoidance of conflicts of interest:** All winkler employees are obliged to avoid conflicts between private interests and interests of the winkler Unternehmensgruppe.

**Professional and personal employee management:** All supervisors treat employees with respect and appreciation and are the point of contact for questions or problems. Furthermore, managers provide employees with feedback on personal performance at regular intervals to enable continuous development. Employees are also encouraged to provide feedback to managers.

**Good working conditions for our employees:** We offer our employees a secure workplace with fair conditions in a collegial environment that provides room for personal development.

The winkler Unternehmensgruppe, including all employees, complies with applicable laws, guidelines and corporate policies.

## Interaction and communication with each other

The success of the winkler Unternehmensgruppe as well as the existence of a pleasant and productive working atmosphere depends to a large extent on open communication among employees.

Therefore, winkler expects a respectful, friendly tone from its employees, both in personal conversations and in correspondence. In our everyday work with each other, we use polite manners and appeal to the personal responsibility of our employees: everyone should treat their colleagues and fellow human beings as they would like to be treated themselves.

In addition, the cohesion and the family-oriented atmosphere have a high priority at winkler. We expect our employees to work well together across locations and departments. Understanding the processes and associated challenges of other departments is essential for mutual support and is therefore regularly promoted in the form of internal seminars.



## Corporate responsibility

As a company in the trade and service sector, we cooperate with many other companies and people. The basis of this cooperation is fair competition, compliance with all commercial obligations and other legal requirements.

These include in particular:

**The rejection of corruption and bribery:** We reject any form of undue advantage. This means that none of our employees may offer, accept or even demand undue advantages, such as bribes, from other persons. The support of third parties or the commissioning of third parties to perform these unlawful acts is prohibited.

**The prevention of money laundering:** We do not tolerate the handling of illegal funds, i.e. funds acquired through illegal activities, in our cooperation with our customers and business partners.

**Compliance with competition and antitrust laws:** In our dealings with customers, business partners and competitors, we act fairly and do not participate in cartels, such as those for colluding on prices or quantities, or other unfair practices.

**Export control:** We comply with all applicable regulations on export control and customs laws and observe export bans, sanctions and embargoes in all business processes.

**The avoidance of violations of applicable tax laws:** In our daily activities, we comply with all applicable statutory provisions of tax law and fulfill all tax obligations in full and in due form and time.



## Dealings with business partners

As part of its business processes, winkler works together with customers, suppliers and other business partners.

In all relationships, the focus is on human interaction. winkler strives for relationships based on partnership and thus lays the foundation for long-term relationships. The open communication culture is also maintained externally with business partners.

The high demands placed on our products are also reflected in the selection of our suppliers. winkler selects its suppliers with a focus on quality and carries out strict checks on its own-brand products.

The customer orientation anchored in our mission statement is made possible by individual and industry-specific advice, an extensive product range and high delivery speed.

Furthermore, we expect all of our business partners to comply with all applicable laws as well as the same ethical behavior that we exhibit as a company.





## Invitations, gifts, events

Not only the cooperation within the company is important at winkler, but also relationships with customers and business partners are close to our hearts. Since invitations as well as gifts are part of the polite way of dealing with and maintaining these relationships, we also give gifts and extend invitations.

Within the usual and appropriate framework, our employees may give or accept gifts and invitations. Invitations to events without a subject-related background must always be declined.

In order to avoid even the appearance of corruption when accepting and giving gifts, all employees follow our guidelines on dealing with gifts and consult the responsible supervisor in cases of doubt.

## Work safety

We offer our employees not only a fair but also a safe working environment. In order to be able to guarantee this work safety and to minimize risks and the danger of accidents, our employees regularly take part in safety briefings. In addition to these general safety instructions, we also conduct special training courses, for example on the handling of hazardous substances and industrial trucks, for employees who work in the relevant areas.

As a technical trade, many employees of the winkler Unternehmensgruppe are employed in the areas of warehousing, logistics and workshop, where special work clothing is necessary. This serves to insure the safety of our employees. Therefore, these and all other employees who are required to wear safety clothing are required to wear the equipment provided to them.

In addition to the occupational safety of our employees, the safety precautions of our service providers and suppliers are also important to us. Therefore, we regularly check, among other things, the load securing as well as the proper equipment of our partners' vehicles.

In addition, all employees comply with other applicable laws and guidelines on occupational safety. To ensure that the current regulations are known and applied at winkler, we use the expertise of external experts.





## Data protection

We collect, process and use personal data and other information in order to fulfill our tasks and obligations towards customers, contractual partners, employees, authorities and other third parties.

This also includes data and information that require special protection. To ensure this protection, our employees are required to handle this data sensitively in all business processes. This applies to the internal data of employees, as well as to data of customers, suppliers, business partners, competitors and other persons.

Compliance with the protection requirement also applies when third parties are present on the company premises, who may only be present in the areas intended for them. All winkler employees are required to observe these regulations and to support compliance with them.

In handling them, employees comply with the applicable data protection laws. In the event of any uncertainties, both internal contact persons and an external data protection officer are available to you. For our business partners and other third parties, the information on data protection is published on our homepage ([www.winkler.de/de/datenschutz](http://www.winkler.de/de/datenschutz)).

## Environmental protection and sustainability

In order to constantly develop as a company, we strive for both external growth and internal development. We are committed to questioning the status quo and using it as an impulse for improvement. We are aware of our economic and ecological responsibility and contribute to sustainable development and at the same time to the economic success of our company with various measures.

In view of the limited resources available to the world's population, responsible use of these resources is a matter of course for us.

Our high quality standards for our entire product range result in products that are designed for a long service life, high functionality and optimum safety.

Furthermore, we appeal to the initiative of our employees: Each individual is encouraged to consider how he or she can optimize environmental protection on a personal, as well as on a company level with the means and possibilities available to him or her.





## Compliance with the guidelines

The compliance guidelines are adhered to by all employees of the winkler Unternehmensgruppe. This includes ensuring that our employees know, understand and put these guidelines into practice. Our conduct is guided by our compliance guidelines and does not violate the rules set forth herein or any other laws applicable to us.

Violations can lead to considerable disadvantages for the winkler Unternehmensgruppe. Examples include fines, penalties, or damage to winkler's reputation. If a violation is noticed, the appropriate manager or trusted person must be informed of it.

At winkler, the first way of solving conflicts and problems is always a personal conversation, as direct and open communication is close to our heart. Nevertheless, depending on the severity of the misconduct, violations of the compliance guidelines may result in consequences under labor law, civil law and also criminal law for winkler or our employees.

As an alternative way, we offer you with the help of our external data protection officer Mr. Erich Zimmermann, Tel.: +49 621 30696731, E-Mail: [hinweis@zida-datenschutz.de](mailto:hinweis@zida-datenschutz.de) or postal address: ZiDa-Datenschutz GmbH, Erich Zimmermann, Schwarzwaldstr. 17, D-68163 Mannheim, [www.zida-datenschutz.de](http://www.zida-datenschutz.de) secure communication for submitting anonymous reports.

Further information on this (Which reports can I submit and how? What is the process behind a reporting? How can I remain anonymous?) and other FAQs can be found at [www.zida-datenschutz.de/hinweisgeber](http://www.zida-datenschutz.de/hinweisgeber)



Christian Winkler GmbH & Co. KG  
Leitzstraße 47  
70469 Stuttgart  
Germany

[compliance@winkler.de](mailto:compliance@winkler.de)

As of 05/2022

