

## ***CODE OF BUSINESS ETHICS OF THE ROKUS KLETT PUBLISHING HOUSE***

### **WHAT IS THE CODE OF BUSINESS ETHICS OF THE ROKUS KLETT PUBLISHING HOUSE?**

**The Code of business ethics of the Rokus Klett publishing house is a collection of values, principles, standards of conducts, communication and the behaviour expected from employees.**

It is coordinated with the legislation and internal company acts, as well as values and principles of our company. All employees use it in their everyday activities. It helps us to avoid unpleasant situations which might violate regulations or harm the good name of our company.

Of course the code of business ethics does not provide answers to all questions. It is important to know the internal company acts and regulations for a particular field and take them into account when carrying out activities. We have to bear in mind that violating or not taking into account the code of business ethics also represents a violation of internal company rules or legislation and can lead to disciplinary action, payment of compensation or even criminal liability.

We are committed to respecting our employer, co-workers, customers, partners and the wider social environment.

### **TO WHOM DOES IT APPLY?**

The code of business ethics applies to all employees, regardless of their job or work location. It also applies to co-workers and business partners who work in the name and on behalf of Rokus Klett, even though they are not employed directly by our publishing house. We must explain to our business partners that we are bound to take into account the code of business ethics and that we expect them to respect similar principles and standards. With their conduct, each manager must present a role model to their employees and business partners and, if necessary, inform them of the contents of the code.

All employees take into account our basic values and principles, as well as the rules of dignified, respectful and decent conduct. We must be aware that our conduct affects the quality of our work, the well-being of our co-workers, as well as the operations and good name of our company.

We must respect and trust our co-workers. We must be tolerant and honest. We must act respectfully towards our business partners, customers and all people with whom we come into contact due to our work. In our team we are committed to building and maintaining quality relationships. We respect the rights and duties of our co-workers and the people with whom we interact. Differences of opinion should not provoke an incorrect response or lead us to violate the rules of good conduct.

The management is committed to ensuring good conditions and an encouraging work environment by employing the same criteria for all of the employees. Moreover, we actively cooperate in adjusting working hours in cases when employees have special reasons for requesting this.

Investing in continuous development and training is our ongoing task, but obtaining and transferring new knowledge to our co-workers is the duty of each of us. With the knowledge and skills obtained, we continuously raise the quality of our products and strengthen our confidence, whilst also enjoying greater respect from our business partners.

Our company is committed to making the employees feel good at their workplace, because we are aware that we spent most of our waking hours at work. Good relations, cooperation and respecting the differences between co-workers contribute to good relations at company level.

#### **THE BUSINESS AND PROFESSIONAL OPERATIONS OF THE COMPANY:**

- we strengthen the basic values and principles of the company,
- we are responsible for our work,
- we are committed to our work and endeavour to achieve common and personal goals,
- we are committed to ensuring good and honest interpersonal relations,
- we accept responsibility and take the initiative, we trust and respect each other,
- we create a relaxed but encouraging work environment which is key to facilitating creativity,
- we have a responsible attitude towards work and colleagues,
- we express our commitment to the company by consistently carrying out our obligations and taking on additional tasks and work when this is necessary,
- we encourage and praise well-executed work and good ideas, as well as provide constructive criticism,
- we endeavour to obtain the knowledge which is required for carrying out our work tasks,
- we attend training workshops and meetings within the framework of the company,
- we provide suggestions for innovations and changes,
- we support the measures which make our professional and family life easier,
- we are committed to achieving business excellence which raises the level of customer satisfaction, as well as the satisfaction of the employees, shortens work processes, reduces costs and corrects errors.

#### **PROHIBITION OF DISCRIMINATION**

In Rokus Klett we are aware that we significantly affect the lives and rights of individuals and communities at every location we operate. Consequently, we are committed to respecting equal rights, achieving equality of all people and respecting those who think differently. We respect all the rights prescribed with the legislation and regulations, as well as other rules from the field of human rights. Since our company operates in different countries and in different languages, we pay even greater attention to avoid possible misunderstandings.

We ensure the same rights and opportunities for all individuals in all procedures. These include protection of privacy, freedom of expression, freedom of association, employment and rewarding irrespective of sex, physical appearance, disability, age, nationality, race or ethnic origin, religious, political or other beliefs, trade union membership, family status, financial standing, sexual orientation or other personal circumstances.

- In Rokus Klett we do not tolerate any type of violence or harassment (emotional, psychological, verbal or sexual) at the workplace,

- we associate with business partners and other stakeholders who respect human rights and fundamental freedoms,
- we are kind, polite, respectful and appreciative towards our co-workers, irrespective of their work position,
- we ensure that our conduct does not evoke unpleasant feelings in our co-workers,
- we do not tolerate conflicting communication between co-workers (e.g. yelling, scowling, insulting, underestimating, mobbing, defamation, etc.),
- when it comes to the procedures in which we decide on the rights of co-workers, we focus on the fair and equal treatment of all,
- we immediately warn co-workers against any rude and unsuitable behaviour in the work environment.

## **BUSINESS ETIQUETTE AT WORK AND IN THE BUSINESS ENVIRONMENT**

We dress in a manner that is suitable for a business environment and ensure personal hygiene.

When we attend a business event, we take into account business etiquette and protocol. We choose clothes which are suitable for such a business occasion.

If we cannot attend a business event, we thank the host for the invitation and apologise by telephone, in written form or personally for not being able to come. If the host expects us to confirm our attendance, we reply in time whether we are attending the event or not.

Greeting co-worker is one of the basic rules of etiquette and good manners. We always politely greet our business partners and, as appropriate, shake hands with them.

Employees who have access to personal data of the employees, customers and buyers of products of Rokus Klett and other persons who have a business relationship with the publishing house are bound to protect such data as confidential. They are obliged to treat personal data with the necessary care and store the data in accordance with the legislation which regulates the protection of personal data in order to prevent unauthorised access to such data to third parties.

## **COMMUNICATIONS**

Each communication within and outside the company mirrors not only our personal conduct, but also the entire company Rokus Klett. When we communicate with others, it is important to always bear in mind the company values and take these into consideration. Our communication should be open, respectful and well-intentioned. We must know how to listen and be able to respond appropriately to both positive and negative information. Appropriate conduct and taking care of their personal appearance (i.e. suitable clothes and personal hygiene) represents part of communication of each Rokus Klett employee.

Good communication positively affects the flow of information, satisfaction of the employees and business partners, as well as company performance.

Therefore, the employees of Rokus Klett always communicate in a suitable manner, with words and actions that reflect business excellence. We act in a positive manner and with good intentions. We respond quickly and always tell the truth. We provide information in a timely, prudent and accurate manner. We communicate in a manner that is clear, understandable and unambiguous. We ensure that our communication has been properly understood, particularly when work instructions are involved.

We ensure that the employees receive important information on the operations of Rokus Klett before they learn about them from other organisational units and the media.

If misunderstandings occur in the organisational unit in which we work, we first talk to the persons who are directly involved and, if necessary, also to their superior. It is also possible to discuss matters with the company management, but the rule of not skipping the levels of management applies.

### **Oral, in writing and electronic communications**

Oral communications are still the most frequent and the fastest manner of communication. Therefore, we have to ensure that we are always kind and respectful to the person we talk to.

Everything we write leaves a mark within and outside the company, which is why we pay special attention to our written communication.

When we talk to people on the phone, we are always polite and present ourselves before we start talking. When we accept a telephone call, we say the name of the company first, followed by our name. With internal calls we politely greet the caller.

When writing letters, documents and e-mails, we follow the principle of being 'brief and to the point'. General rules of communication also apply to written communication. We must be aware that every document or e-mail that leaves Rokus Klett is a reflection of our corporate culture and of the relationships among us, the employees.

Documents to be sent in paper form to external addresses must have the company header and footer. We follow all of the rules of the Rokus Klett corporate identity. We also take into account the rules of corporate identity in computer presentations.

When writing letters, documents and e-mails, we follow the principle of being 'brief and to the point'. The principle of 'less is more' applies to the content of a communication, as well as to the number of recipients of that communication.

We always write the subject of the message, which will help the recipient to immediately see the content of the message. We use the 'Urgent' label sparingly, for cases where the matter really is urgent. It is preferable to call the colleague or to speak to them personally. For periods of absence, we prepare an out-of-office automated e-mail reply.

## **THE BASIC RULES OF COMMUNICATION:**

- think very carefully before writing and sending any communication,
- observe the rules of proper writing,
- use only the agreed signature for e-mail communication,
- prevent e-mail flooding,
- if it is evident from the e-mail that it requires a reply, we always reply,
- do not over-use e-mail for personal communications,
- do not send e-mail to people who are not authorised or included in processing certain contents and projects,
- always reply to missed calls,
- speak clearly and understandably, always be polite, kind and patient.

## **COMMUNICATION BETWEEN EMPLOYEES OF ROKUS KLETT:**

- we communicate in such a way as to make the most efficient possible use of time, observe the agreed deadlines and respect the mutual agreements made,
- we use all available means of electronic communication, but in doing so do not neglect interpersonal relations,
- we call meetings in a timely and responsible manner by using tools available in our IT system;
- we arrive at the meetings on time,
- if we cannot attend a meeting, apologise in a timely manner or send another person to be present instead of us,
- strengthen the culture of providing feedback by indicating to our colleagues what is good (or bad) and what might be even better,
- we provide substantiated praise or reprimands promptly,
- we do not use swear words or offensive expressions, nor do we communicate in a way that might hurt or denigrate another person. We do not make inappropriate comments about our colleagues either within the company or outside of it,
- we do not use any kind of communication that would harm the reputation of the company,
- we do not discuss outside of the company the matters for which we are not authorised.

## **Communication with customers**

When communicating with the customers, we take into account the basic principles of business communication and business etiquette.

The purpose of communicating with the customers is to recognise and understand their wishes and needs, as well as to obtain feedback with which we can improve our relations.

Our objective is to establish long-term partnership and maintain our relations, which is why it is important to understand their expectations and needs. We endeavour to communicate with our clients in a manner that makes them understand the characteristics and advantages of our products, services and solutions.

We communicate with our customers orally and in written form, verbally and non-verbally, formally and non-formally. We receive each customer with a smile and conduct ourselves in a friendly and helpful manner.

We take into account that customers communicate in different ways.

When communicating with our customers, we are especially responsive and fast, even when they are making a complaint. We understand each complaint as an opportunity to become better and solve the matter in accordance with the internal rules.

We always provide the customers with clear, accurate and unambiguous information and do not withhold information that may be important for them when making a decision.

We communicate with customers in a manner that will make them recommend our publishing house to other customers because of our business communication.

We never promise to customers what we cannot deliver.

## **IMPLEMENTATION OF THE CODE OF BUSINESS ETHICS**

- The employees must respect and take into account the rules and principles of this code of business ethics.
- We will inform and educate employees on how to solve conflict situations.
- With open communication between the employees and managers at all levels of management we will be able to tackle any dilemma that may occur in relation to the implementation of the code of business ethics.
- When we learn about an unlawful and/or immoral action, conduct or event that could damage the business and reputation of Rokus Klett, or violates the dignity and personal integrity of an individual employee, we are obliged to inform our superior thereof in person or in writing without delay.
- Any violation of the code of business ethics and other obligations arising from the employment relationship represents a violation for which the employee may be liable to disciplinary action, payment of compensation and criminal liability.
- Non-implementation of the code of business ethics represents a very high level of risk for efficiently achieving of business objectives and implementation of the strategy of Rokus Klett.

## **VALIDITY OF THE CODE OF BUSINESS ETHICS**

The code of business ethics of the Rokus Klett publishing house is adopted by the management and enters into force on the date of its publication.

These rules of procedure shall be posted on the Rokus Klett intranet site.