



ETHICAL NORMS AND VALUES FOR TINGLEMAN EMPLOYEES

Tingleman staff commit themselves to promoting the highest standard of professional ethical norms and values for the benefit of customers, shareholders and stakeholders. Our norms are established standards of conduct that are expected and maintained by all Tingleman employees. Tingleman values reflect the collective conception of what people find desirable, important and morally proper. These values serve as the criteria for evaluating our actions against the expectations of others. Tingleman staff must recognize that they not only serve their enterprises but also act as stewards in our industry and in society, facilitating and executing the efficient and effective transactions that are part of the greater economy. In this role, Tingleman staff should embrace the highest ethical norms of practicing professionals and the ethical values implied by their responsibility toward stakeholders (e.g., customers, employees, investors, channel members, regulators and the host community).

General Norms

Tingleman staff must do no harm. This means doing work for which they are appropriately trained or experienced so that they can actively add value to Tingleman and to customers. It also means adhering to all applicable laws and regulations and embodying high ethical standards in the choices they make in the conduct of their professional work on behalf of Tingleman.

Tingleman staff must commit to providing services and products that are clearly wanted and needed by our customers and providing these services in a manner that is wanted and appreciated by our customers. This means that products are appropriate for their intended and promoted uses. It requires that marketing communications about goods and services are not intentionally deceptive or misleading. It suggests building relationships that provide for the equitable adjustment and/or redress of customer grievances. It implies striving for good faith and fair dealing so as to contribute toward the efficacy of the exchange process.

Tingleman staff must embrace, communicate and practice the fundamental ethical values that improve customer confidence in the integrity value added proposition offered by Tingleman. These basic values are intentionally aspirational and include honesty, responsibility, fairness, respect, openness and citizenship.

Ethical Values

Honesty—to be truthful and forthright in our dealings with customers, stakeholders and fellow staff.

- We will tell the truth in all situations and at all times.
- We will offer products of value that do what we claim in our communications.
- We will stand behind our products if they fail to deliver their claimed benefits.
- We will honor our explicit and implicit commitments and promises.

Responsibility—to accept the consequences of our decisions and strategies.

- We will make strenuous efforts to serve the needs of our customers.
- We will avoid using coercion with all stakeholders.
- We will acknowledge the social obligations to stakeholders that come with increased marketing and economic power.
- We will recognize our special commitments to economically vulnerable segments of the market such as children, the elderly and others who may be substantially disadvantaged.

Fairness—to try to balance justly the needs of the buyer with the interests of the seller.

- We will represent our products in a clear way in selling, advertising and other forms of communication; this includes the avoidance of false, misleading and deceptive promotion.
- We will reject manipulations and sales tactics that harm customer trust.
- We will not engage in price fixing, predatory pricing, price gouging or “bait-and-switch” tactics.
- We will not knowingly participate in material conflicts of interest.



Respect—to acknowledge the basic human dignity of all stakeholders.

- We will value individual differences even as we avoid stereotyping customers or depicting demographic groups (e.g., gender, race, sexual orientation) in a negative or dehumanizing way.
- We will listen to the needs of our customers and make all reasonable efforts to monitor and improve their satisfaction on an ongoing basis.
- We will make a special effort to understand suppliers, intermediaries and distributors from other cultures.
- We will appropriately acknowledge the contributions of others, such as consultants, employees and coworkers.

Openness—to create transparency in our interactions and operations.

- We do not gossip or speak in a denegrating or derogatory way of other customers or fellow staff. If a criticism is to be raised, it is to be raised in the presence of the person concerned, or not raised at all.
- We will strive to communicate clearly in every professional context.
- We are open to change when change is required.
- We will accept constructive criticism from fellow staff members, our customers and other stakeholders.
- We will explain significant product or service risks, component substitutions or other foreseeable eventualities that could affect customers or their perception of the purchase decision.
- We will fully disclose list prices and terms of financing as well as available price deals and adjustments.
- We do not engage in deceptive or corrupt dealings.

Citizenship—to fulfill the economic, legal, philanthropic and societal responsibilities that serve stakeholders in a strategic manner.

- We will strive to minimise harm to the natural environment of Tingleman's commercial activities, and commit to a course of ongoing improvement in Tingleman's environmental impact.
- We will give back to the community through volunteerism and charitable donations.
- We will work to contribute to the overall betterment of Tingleman and its reputation.
- We will encourage supply chain members to ensure that trade is fair for all participants, including producers in developing countries.