



Code of Corporate Digital Responsibility

Voluntary compliance including reporting

Voluntary compliance by the signatories

Digitalisation has far-reaching consequences for our society and our economy. To ensure that the digital transformation succeeds and develops its value for all stakeholders, it is crucial that its implementation take into account more than just aspects of technological, business, legal and economic policy. Ethical guidelines and fair conditions are equally important cornerstones of successful digitalisation.

We firmly believe that there will be no sustainable growth in digital markets unless these aspects are taken into account.

Corporate Digital Responsibility (CDR) can play a significant part in ensuring that the digital transformation is fair and benefits all, and thereby contributes to sustainable development. We define CDR in this process as voluntary business activities that go beyond what is required by law, especially in the interest of consumers, and play an active role in shaping the digital world for the benefit of society. CDR is therefore part of a comprehensive corporate responsibility.

We discharge this responsibility by, among other things, committing ourselves to the following guiding principles and concrete CDR objectives:

Principle 1: Core social values

We deploy technical systems in such a way that they are consistent with and promote our core social values, such as democracy, freedom, the social market economy and the principle of equal treatment.

Principle 2: People focus

We put people at the centre of the development and use of technical systems.

Principle 3: Generating benefits

Technical systems that are used by consumers should provide added value. We weigh up the benefits and risks to consumers in using these systems; the benefits to consumers must be proportionate to the risks.

Principle 4: Avoiding harm

We design our technical systems with the aim of avoiding harm to consumers. We ensure that the risks of technical systems remain calculable and manageable from a technical and social perspective.

Principle 5: Autonomy

In the development and use of technical systems, we respect the self-determination of consumers.

Principle 6: Fairness

In the development and use of technical systems, we strengthen participation in and access to a digitalised world. Consumers are not unfairly discriminated against.

Principle 7: Transparency

We provide intelligible information on the basic functions and effects of our technical systems that are aimed directly at consumers and have relevant effects on them.

Principle 8: Responsibility

We ensure that the ultimate responsibility for the design and use of our technical systems is assigned to a clearly designated responsible officer, i.e. a human rather than a technical system.

Principle 9: Sustainability

In the context of digitalisation, we aim to contribute to resource-conserving and socially equitable development in line with the United Nations Sustainable Development Goals.

Our actions in accordance with these principles manifest themselves in our voluntary compliance with the objectives formulated for the following CDR fields of action:

Field of action: Data handling



Data are fundamental to all digital processes. The opportunities offered by digitalisation cannot be used without data access and data processing. In a digital society, ethical handling of data and the consumer-friendly implementation of legal requirements are of key importance – for both taking advantage of opportunities and avoiding risks. To this end, we pursue in particular the following objectives identified by the CDR Initiative:

Working actively to counter bias in data analysis

For consumers, the use of algorithmic systems gives rise to a risk of unintended systemic bias whose effects cannot be predicted in advance and which therefore cannot reliably be avoided.

We actively counter these risks in the design of technologies and processes of algorithmic systems.

Responsible, fair and transparent profiling

The rapid growth in available data, computing capacity and new classes of algorithmic systems, in particular in the area of machine learning, is creating new opportunities for profiling consumers. In individual cases, profiling can have relevant effects on consumers.

We put responsibility, transparency and fairness at the centre of a human-centric approach.

Ensuring consumer sovereignty and autonomy

Digitalisation and rapid growth in the availability of data create many opportunities for consumers. By the same token, however, these opportunities are offset by the risk of information asymmetry in favour of the companies processing the data.

We design processes and products in such a way that consumers can take sovereign, autonomous decisions in the relevant situations.

Promoting responsible design of technology in data handling

The implementation of ethical data handling requires advanced technical solutions, ranging from the general infrastructure through product design down to customer interfaces.

We encourage the development of responsible technology design as far as possible.

Ensuring responsible data handling in the company

As a signatory to this declaration, we commit ourselves to our responsibility for ethical handling of data. In this context, we regard the due consideration of ethical issues as a company-wide cross-sectional task.

We ensure that responsible data handling plays a central role in the company and in our processes.

Taking responsibility for data handling beyond our own company

The data economy, too, has increasingly complex value chains involving several companies, e.g. in digital ecosystems and platform models.

In our sphere of influence, we also assume responsibility in the value chain as far as possible.

Systematically enhancing data and cyber security

As the extent of interconnectedness increases, both the number and the impact of cyber attacks have been rising. In the common interest of consumers, the economy and society, all involved parties have to take comprehensive and coordinated measures for data and cyber security.

We systematically enhance our security systems, including any subsystems, by, among other things, taking data and cyber security into account in system and product development right from the start, systematically avoiding security gaps during roll-out and operation, and setting up powerful management systems.

Field of action: Education



The increasing digitalisation of the economy brings far-reaching changes for many customers as well as for a large proportion of company employees. Specific education offerings tailored to the needs of various target groups can contribute to preparing people for these changes.

To this end, we pursue in particular the following objectives identified by the CDR Initiative:

Informing about opportunities and risks and empowering consumers and employees to take autonomous action

Many people are asking themselves what specific impact the digital development will have on consumers and employees and what opportunities and risks this could entail. Companies that act responsibly should take these uncertainties seriously and take conscious steps to counter them.

For this reason, we undertake to provide measures and information to our employees that allow them to prepare for the opportunities and risks of digitalisation in the working environment.

In addition, we aim to provide our customers and interested parties with offerings that allow them with regard to our products and services to gain a differentiated picture of the possible effects of digitalisation on their day-to-day lives as consumers and to enable them to use our digital offerings independently and securely.

Informing about ethical issues of digitalisation

Technical know-how alone is not enough for living in the digital society and dealing with digitalisation. Knowledge about ethical challenges and a value system against which the possibilities and limits of digitalisation can be calibrated are also important to ensure sovereignty in dealing with new technologies. By offering information and engaging in dialogue, we aim to give our employees guidance on the ethical handling of digital technologies and services, and to enter into an exchange with them.

Field of action: Climate and resource protection



Digitalisation generates considerable opportunities, but is also associated with a number of risks to nature and the environment. It is a key driver of climate and resource protection, but can at the same time be associated with potential negative impacts on the environment.

To ensure that digitalisation as a whole develops a clearly positive effect on climate and resource protection, we pursue in particular the following objectives identified by the CDR Initiative:

Strengthening digital solutions to protect our environment

Digital solutions have the potential to contribute to the protection of our environment in many different ways. Digitally enhanced information for consumers can support sustainable consumer decisions. Digital technologies offer the potential to stabilise the balance of ecosystems and to reduce CO₂ emissions.

We aim to develop or support such technologies to an increasing extent and to use them wherever this is feasible.

Designing and using information and communication technologies that protect the environment and resources

Some digital applications and the products based on them use considerable amounts of energy for their own operation.

We make it our objective to design and use these technologies in ways that protect the environment and resources as far as possible over their entire lifecycle.

Field of action: Employee involvement



Digitalisation changes the way we work. It is in the common interest of employers and employees to take the concerns of employees into account in the digital transformation. This relates not only to qualifications in their specific professional activities, but also to encouraging employees in their personal development. To this end, we pursue in particular the following objectives identified by the CDR Initiative:

Involving employees in design and decision-making in the digital transformation

A successful corporate culture enables employees to influence their own environment. This is also essential for dealing with changes caused by the digital transformation.

We actively promote exchanges about the issues of digital transformation between management and employee levels and jointly work on solutions that incorporate these perspectives.

Preparing employees for change and supporting them during the transformation

The digital transformation is often accompanied by uncertainty. Timely and clear information to and communication with employees can help to lighten the burden and increase acceptance of change.

We undertake, as far as possible, to communicate new developments in the digital transformation of our company and of society to our employees in a timely and transparent manner and to support them during the change even beyond their own immediate working environments.

Field of action: Inclusion



The increasing digitalisation of many areas of life and work brings considerable opportunities for society as well as for each individual. To allow these to be realised, it must be ensured that no social groups are systematically excluded from digital transformation, or from participating in social or economic life as a result of digitalisation. To this end, we pursue in particular the following objectives identified by the CDR Initiative:

Working to counter access barriers to products and services

Digitalisation sometimes creates access barriers. We therefore aim to minimise such access barriers within our business model. In doing so, we give high priority not only to economic aspects but also to fairness criteria.

Promoting solutions to support participation

Access to digitalisation is relevant to all groups in society and digital solutions provide many possibilities to overcome existing barriers.

We engage in researching, developing or promoting solutions that support participation by the widest possible populations. In this context, we also keep an eye on offerings for individuals and groups who, due to their situation in life, face particular challenges when accessing digitalisation.

By signing this Code, we, as a company, publicly undertake to be guided by the above principles in our business activities with consumers in Germany and to pursue the objectives highlighted in the different CDR fields of action. In addition, we undertake to aim for continuous improvement in the effectiveness of our actions and to report annually on the development of these actions in accordance with the reporting requirements defined in the document entitled „Reporting requirements and questionnaire“.

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