

INTE

GRITY

Our Integrity Code

Making the
Right Decisions

Mercedes-Benz



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Dear Colleagues,

Mercedes-Benz is one of the most valuable and successful brands in the world. That has been the case for a long time – and we want it to remain so in the future. Because even in times of rapid transformation and uncertainty, our goal is still the same: we want to produce the most desirable cars in the world.

Many conditions must be met if we are to master the transformation successfully. We need pioneering spirit and excellence to remain in the technological forefront. We must systematically subscribe to sustainability – ecologically, socially and economically. And we need a culture of integrity. Because it is integrity that enables us not only to achieve short-term goals, but also to act sustainably. Committing ourselves to integrity means choosing the path to long-term success.

What does integrity mean, and how can we firmly establish it in our daily working activities? The basic principle is that our actions must be in keeping with our responsibility – especially with respect to new technologies, global challenges such as climate change and respectful working relationships. It is all about making responsible decisions, openly addressing problems and also learning from mistakes. Integrity is the basis for our teamwork and the engine of our innovative strength. It enables us to develop the best solutions together and to strengthen our brand. That is why it is important to base our individual actions on clear principles. The aim of our Integrity Code is to provide guidance in this respect.

Whether in production or administration, all of us make day-to-day decisions in which integrity plays a part. And decisions based on integrity are not always the easiest. But they are always the correct choice. Because acting with responsibility and integrity is the basis for sustainable success, our reputation and our trustworthiness.

INTEGRITY CODE

01 Introduction:
Integrity as foundation
for long-term success

It is the combination of **brand**¹ strength and cutting-edge technology that have enabled us to build the most desirable vehicles in the world. For more than 130 years, we have continuously developed fascinating vehicles and repeatedly set new standards.

At Mercedes-Benz², we are driving the transformation forward together. We never lose sight of our long-term goal, Ambition 2039. In our “Ambition 2039” we have set ourselves the target of making our fleet of new vehicles net carbon-neutral³ along the entire value chain and over the vehicles’ entire life cycle by 2039. Additionally, we have set goals such as expanding battery production and our charging infrastructure, qualifying our employees for new fields, developing pioneering technologies, and creating our own operating system. Increasingly, we are relying on the use of artificial intelligence. It is important to us to meet various demands in terms of ecological and social responsibility, as well as good corporate governance. To achieve this and remain economically successful in the long term, we act responsibly and make the right decisions.

In addition to these opportunities, the pace of change demands that we are flexible and adapt quickly. Furthermore, our actions are shaped by a variety of external factors and challenging market conditions. We are navigating a field of tension

of (still) unregulated requirements for innovations and an increasingly regulated environment. We face this challenge head-on.

As a global market leader and multinational enterprise, it is now more important than ever to handle dilemmas, contradictions and conflicts of interest responsibly. The key question is:

What role does integrity play in this?

Our Integrity Code provides us with the framework for this. It applies to every one of us within the company, at every level, from employees to managers, and even the board and executive members of Mercedes-Benz.

¹Terms in bold in the main text are explained in the glossary.

²When this policy refers to Mercedes-Benz, it means Mercedes-Benz Group AG and the companies over which Mercedes-Benz Group AG alone (directly or indirectly) exerts controlling influence and control (according to the app 'GENESIS - Global Entity & Shareholding Information System').

³Net carbon-neutral means that carbon emissions that are not avoided or reduced at Mercedes-Benz are compensated for by certified offsetting projects.

It is the duty of every one of us to familiarize ourselves with the contents, to know them and to base our decisions on them. If specific policies or other regulations have been enacted, then they must also be followed.

We familiarize ourselves with the contents.

Anyone who engages in misconduct must expect appropriate consequences. In case of doubt, we have numerous points of contact within our company where you can seek guidance and support. Only by following the integrity code can we succeed in steering our company into the future together.

Misconduct will not be tolerated.

We are all role models and share the responsibility to create, demand and continuously work on a culture of integrity in our daily work. For a successful future, it is our collective duty to pull together and take responsibility for our actions.

We are all role models for integrity.

Our managers have a special responsibility in this regard. They are expected to fulfill their role model function through integrity and provide guidance to employees. They create an appropriate knowledge base for their employees and empower them to take responsibility for their actions. They explain the background of decisions to their team members to achieve goals together and promote a culture of mutual respect.

ROLE MODEL

Mercedes-Benz expects its managers to live up to their role model function.



02 Our Understanding of Integrity

02.1

INTEGRITY AT MERCEDES-BENZ

For us, integrity means making the right decisions. In doing so, we follow internal and external rules, act in accordance with our five corporate principles, and listen to our inner compass.

Our **Integrity Code** forms the Foundation for the shared understanding of our values and guides us to act with integrity in our daily work. However, the contents of the Integrity Code cannot anticipate every situation in which we must make decisions, especially in situations where there are no clear rules or where they can be interpreted differently.

For us, integrity means
making the right decisions.

INNER
COMPASS

02.2

MAKING THE RIGHT DECISIONS

It is our responsibility to make difficult decisions on the right basis. This is sometimes challenging and requires courage, but in the long run, it pays off. The way we make decisions reflects our mindset and thus expresses our integrity.

The following questions are a guide and serve as orientation in the decision-making process:

- / Does my decision contradict our Integrity Code and our understanding of values?
- / Does my decision contradict laws and regulations?
- / Am I managing company resources as if they were my own?
- / Am I willing to take responsibility for my decision?

/ Am I aware of the short-, medium- and long-term impacts of my decision?

/ Am I acting as a role model with my decision?

/ Do I have a good gut feeling about the decision-making process?

/ Would I want to read about my decision in the newspaper tomorrow?

In case of doubt, we seek support from colleagues, our managers or the relevant experts to ensure that we have all the necessary information for our decision.

The right decisions are the foundation of our sustainable success, contribute to our trustworthiness, and support our goal of building the most desirable vehicles in the world, and protection the reputation of our brand.

TRANS PARENCY



03 What we stand for: Our Corporate Principles

Our Corporate Principles describe the fundamental guidelines of our self-conception. They form the basis of our actions and guide us in our everyday working lives.

01

Corporate Principle 01:

We strive to create sustainable value – economically, ecologically and socially

We produce fascinating vehicles and offer innovative mobility services in order to be successful and profitable. After all, we can only offer future prospects if we are economically successful. The most important asset in our company is the people who work for Mercedes-Benz and the passion with which they do so. Accordingly, we invest in the personal development of our employees. We handle our resources responsibly because a sustainable approach to the environment is important to us. Our aspiration is to strike a balance between profitability, people and the environment.

02 /

Corporate Principle 02:

We act responsibly and respect the rules

At Mercedes-Benz, we take responsibility for our actions and decisions and we also follow the rules. This means that we observe laws, internal and external rules, agreements with employee representatives, voluntary commitments and this Integrity Code. The **Mercedes-Benz Compliance Management System** helps us to ensure adherence to laws and policies within Mercedes-Benz, prevent misconduct, and systematically minimizes compliance risks. We make our decisions conscientiously. Everyone is urged to reflect on their own behavior.

03

Corporate Principle 03:

We address issues openly and stand for transparency

The foundations for our actions and behavior – internally and externally – are honesty, openness and transparency. This enables us to establish trust. We learn from the past and rise to new challenges. We encourage every one of us to stand up and contribute their opinion when something is not right or does not feel right (**Speak-up culture**). To that end, we create an atmosphere in which we can tell it like it is without the fear of negative consequences. Different opinions are respected, and people are encouraged to question the decisions of others.

04 /
Corporate Principle 04:
Fairness and respect
are the foundation
of our collaboration

At Mercedes-Benz, we treat one another with fairness and respect. Team spirit, mutual trust and a respectful attitude are important to us. This applies for our employees and also for our customers, all **business partners** and everyone else.

05 /

Corporate Principle 05:
We practice diversity

At Mercedes-Benz, **diversity** is more than simply a matter of complying with legal requirements. At Mercedes-Benz, our strength lies in the differences between our employees, which are a key factor in our success. Their varied skills, perspectives and experiences form the basis of innovation and help us to understand the needs of our customers worldwide. Our corporate culture is characterized by respect, appreciation, integrity and team spirit.

COLLABORATION

04 How we work: Our Behavior Guidelines

Our behavior guidelines are specific rules that are binding for all employees. They are aligned with our corporate principles as well as mandatory internal and external requirements.

04.1.1

DIVERSITY AND INCLUSION

Discrimination is not tolerated
in any form - our aim is
equal opportunities for all.

At Mercedes-Benz, we appreciate the differences between our employees. That is why **diversity** is part of our corporate strategy. We respect the personal rights of our employees and create a culture of appreciation and respect in which we can develop as individuals and utilize our full potential in the workplace.

Any form of **discrimination**, harassment, unfair conduct or **bullying** goes against who we are and has no place at Mercedes-Benz. Our goal is equal opportunities for all.

In accordance with our corporate principles, we are open with each other and treat each other with an attitude of mutual respect, appreciation and fairness.

Discrimination is not tolerated in any form, especially not with regard to the following:

- Age
- Disability
- Gender, gender identity and gender expression
- Health status
- National and ethnic origin
- Political opinion, religion or ideology
- Political, social or union affiliation
- Sexual orientation
- Social background

Diversity is part of our
corporate strategy.

It is our shared duty to create a fair, respectful and friendly working environment. For us, as a globally operating company, **diversity** and **inclusion** are the basis for economic success.

Together we foster
a culture of respect.

DIVERSITY



04.1.2

HEALTH AND SAFETY

We all bear responsibility for occupational health and safety in the workplace.

One of the top priorities at Mercedes-Benz is the health, safety and well-being of its employees. We create a working environment in which every one of us can perform to the best of their ability while maintaining their physical and mental health.

High technical and workplace safety standards are crucial for our work. Their purpose is to prevent work-related accidents and illnesses. To jointly achieve this, we expect our employees to play an active role in the process.

At Mercedes-Benz, we follow the rules and other requirements for occupational safety. For example, we use the required safety equipment, take individual responsibility for safe working conditions and report any potential health and safety risks. We do not work under the influence of alcohol, drugs or other intoxicating substances. We make sure not to endanger our own safety or the safety and well-being of others.

Mercedes-Benz offers country-specific programs designed to promote health and aimed at prevention, and we count on the active participation of our employees. The programs cover areas such as the following:

- Occupational safety and medicine
- Health promotion in the workplace
- **Ergonomics**
- Reintegration and social counseling

Mercedes-Benz offers its employees a range of prevention programs aimed at promoting good health.

Safe working conditions are a high priority for us.

04.1.3

WORK-LIFE BALANCE

Our workplace culture is based on trust and respect. Mercedes-Benz creates general conditions that support its employees in their personal life situations as well as help them to give their best and remain productive. In doing so, we enable all of our employees to contribute as much as possible to our success. To assist, we offer a variety of country-specific options and programs for maintaining a work-life balance on the basis of company regulations.



Mercedes-Benz creates the conditions necessary for supporting the balance between work and private life.

04.1.4

CONFLICTS OF INTEREST

If conflicts of interests arise,
we disclose them.

Mercedes-Benz respects the personal interests and the private lives of its employees. Every employee has to make sure that personal and private financial interests do not influence business decisions.

Therefore, we avoid situations in which personal or private financial interests conflict with the interests of our company or **business partners**.

If such conflicts of interest exist or appear to exist, we disclose them and seek a solution with the respective manager which does not harm the interests of our company.

Conflicts of interest can arise, for instance, if employees encounter any of the following situations:

- Accept, offer or grant gifts or invitations
- Are **members of the governing bodies** of other companies
- Pursue sideline activities
- Have interests in competing companies or **business partners**

We carefully balance the interests of individuals
with the interests of the company as a whole.

04.1.5

SIDELINE ACTIVITIES AND GOVERNING BODY MEMBERSHIPS

Paid sideline activities (in particular, outside employment) by our employees must be disclosed to the responsible manager before paid sideline activities starts.

The manager will review whether the paid sideline activity might interfere with the employment duties or pose a **conflict of interests**. If there is a conflict of interests or interference with employment duties, the sideline activity can be prohibited.

The assumption of a mandate in an executive board, **supervisory board**, advisory board or other governing body of any other company could also lead to conflicts of interest. For that reason, employees are permitted to assume such duties only after they have been approved.



The assumption of a mandate in other companies is subject to approval.

04.1.6

SHAREHOLDINGS

As employees, we can acquire and hold shares and interests in **business partners** or competitor only if it is a small-scale investment and the possibility of a conflict of interests or the appearance of a conflict of interests has been ruled out. This rule may not be circumvented by having a third party hold the shares on behalf of the employee.

Before joining our company, potential employees who already hold larger than small-scale investments in business partners or competitors are required to disclose them to the responsible manager. This also applies to shares acquired by an employee through an inheritance.

Owning shares in business partners or competitors is not permitted if this results in a conflict of interests.

We engage in sideline activities only when these do not lead to any conflicts of interests.

04.1.7

USE OF COMPANY RESOURCES

We use company resources carefully and sustainably. We do so because of our social and environmental responsibility, out of respect for and as an obligation to our shareholders and because it is in our own interest to work in a company that operates sustainably.

We utilize company resources in a responsible and sustainable manner.



We protect information because it is valuable.

As a rule, we use the company's materials, intellectual property, assets and other resources only for official purposes.

Exceptions apply when company regulations allow the personal use of company resources. **Wasting** resources diminishes the company's assets and can also result in **reputational damage**. We therefore make sure that we ourselves and those around us use company resources responsibly and economically.

We handle **information** responsibly. It is among our most important assets. We are aware that information in the hands of unauthorized persons can harm Mercedes-Benz. The protection and safeguarding of information is of great importance to Mercedes-Benz.

We utilize company resources for business purposes only.

As a result we ensure that external parties cannot view our information without authorization. This applies in particular, but not exclusively, to the deliberate communication of information. We also take into account the circumstances to prevent indirect disclosure of information, such as accidental talking about sensitive information in public spaces. We assume responsibility by applying and using the framework conditions for information security. We handle and communicate Mercedes-Benz's information in a way that is appropriate, mindful and secure.

We protect our trade secrets. These can include inventions, new products, new vehicle concepts, and software code that give us an edge over our competitors. Therefore, we safeguard this information with particular care through appropriate confidentiality measures. We comply with laws and internal regulations for protecting business secrets and respect the business secrets of our competitors, **business partners** and customers.

We take special care to protect our business secrets.



HONESTY

04.1.8

INTELLECTUAL PROPERTY PROTECTION

Mercedes-Benz Group AG owns numerous **patents** and other property rights such as **trademarks** and **designs**. They are among our most important corporate resources and ensure Mercedes-Benz's ability to compete, act and innovate. We therefore ensure that they cannot be misused by third parties. It is equally important to ensure that we avoid the unauthorized use of third-party intellectual property.

Patents and other protective rights are among our most important corporate resources and need to be protected.

04.1.9

REPRESENTING MERCEDES-BENZ

External publications must adhere to the requirements of the process guideline.

It is everyone's business to handle corporate information responsibly. For this reason, Mercedes-Benz follows a policy intended to ensure a coordinated and uniform representation of the company (**One Voice Policy**).

Statements to the media (online, print, TV, radio, podcasts, social media, etc.) made by the company and its employees are handled by and must be coordinated with the Communication and Marketing units. Inquiries by external media representatives are handled only by Communications and Marketing.

External publications that are made by a specialist function and are intended for external target groups, such as scientific articles, lectures or participation in panel discussions for members of the trade, are the responsibility of the specialist units. They must adhere to the requirements of the respective process guideline.

Our employees have the right to freedom of expression. When stating our opinions in public, at events, in public online forums or on social media networks where we can be recognized as Mercedes-Benz employees, we ensure that we identify our personal views as such.

Media statements made by the company and employees are coordinated with our communication and marketing team.

Personal opinions are indicated as such.

04.1.10

SOCIAL MEDIA

Social networks play an important role in the public debate. We, too, employ social networks and our own social media channels to interact and communicate with our followers, **business partners**, customers and employees. This gives us as a company the opportunity to increase our own visibility, reach and popularity and, in turn, acquire new customers, employees and fans.

We are an open-minded, global organization. As described in our Corporate Principles, integrity, appreciation and respect are important



04.1.11

WORK WITH EMPLOYEE REPRESENTATIVES

We do not tolerate any hate-filled, derogatory or discriminatory posts on social media.

Examples of other unacceptable posts include those that:

- Convey subversive content
- Offend the dignity of others
- Threaten harmony within the company
- Discredit our reputation or the reputations of our employees
- Harm our relations with key stakeholders such as organizations, suppliers or shareholders

We do not tolerate any hate-filled, derogatory or discriminatory posts on social media.

We are committed to our social responsibility. We work with all employees, employee representatives and unions in a spirit of respect and trust. We are dedicated to achieving a fair balance between the economic interests of the company and the interests of employees. Even in cases of conflict, the shared goal will be to lay and preserve a firm foundation for constructive collaboration.

We work constructively with employee representatives.

04.2.1

COMPLIANCE WITH PRODUCT REQUIREMENTS

For us at Mercedes-Benz, the safety and quality of our products have a high priority. In times when technologies and regulations are changing rapidly, we are committed to shaping the mobility of the future at an outstanding level.

CONFORMITY

We are committed to shaping the mobility of the future at an outstanding level.



In this way, we ensure the legal and regulatory conformity of our products.

We are pursuing the goal of reducing emissions – particularly those from vehicles in order to continuously improve air quality – through the technological advancement of our products. Moreover, we are making efforts to continually lower the output of greenhouse gases in order to continue our contribution to protecting the climate.

Our company has a history of setting numerous new standards when it comes to safety. This aim also applies to technological innovations, such as alternative drivetrains, automated driving and our new software architecture.

In addition, one of our objectives is to ensure the legal and regulatory conformity of our processes and products throughout the entire **life cycle**. When doing so, we take into account the fundamental spirit of the relevant laws and regulations as well as the **state of the art in science and technology**. We also adhere to voluntary product-related commitments.

In cases of unclear legal framework conditions, our employees find guidance in our Corporate Principles as well as established and communicated structures and procedures.

We use technological advances to reduce emissions and greenhouse gases.

As employees, we play a central role. From initial conception to end of life and disposal of our products, we as experts contribute to meeting relevant product requirements as well as the expectations of our customers and society, helping to strengthen their confidence in our products.

We know the regulations that apply to our areas of responsibility and ensure that our level of knowledge is always up-to-date. In every phase of our products' **life cycle**, we think about the possible impact of our actions. We openly address all potential risks (including those related to the safety, conformity and environmental compatibility of our products) in our areas of responsibility (**speak-up culture**) and use the designated points of contact, processes, and committees to speak up about these risks.

As experts, we strengthen the confidence in our products.



We consider the possible impact of our actions in everything we do.

04.2.2

TAX AND CUSTOMS REGULATIONS

We reject aggressive and illegal tax avoidance schemes.

At Mercedes-Benz, we comply with the provisions of tax and customs laws, which include regulations on corporate tax, income tax and value-added tax, as well as customs duties and excise tax to be paid on the import of goods.

Correct and timely declaration and payment of taxes and duties is a basic principle for Mercedes-Benz. We do not use aggressive or illegal tax avoidance schemes. We pursue our objective of a sustainable corporate policy, including for tax and customs matters, by way of sustainable tax planning, based on stable processes to ensure compliance with tax and customs laws.

We comply with applicable tax and customs regulations.

04.2.3

ANTITRUST LAW

We are committed to
protecting fair competition.

Well-functioning and free competition is one of the fundamental pillars of our social and economic system. It creates growth and employment and ensures that, as consumers, we can all buy modern products at reasonable prices.

Mercedes-Benz, too, benefits from functioning competition because the laws also protect us from unlawful agreements and excessive prices. We are committed to ensuring fair competition in our markets and to following applicable antitrust and competition laws.

Antitrust risks occur in a wide variety of situations – for example:

- When exchanging information and benchmarking with competitors
- As part of investments in shareholdings and during cooperation
- In connection with customer service and sales
- Regarding sales incentives
- When engaging in trade association activities

Each and every one of us plays an important role in complying with laws and internal regulations. Compliance with regulations requires that every employee knows and follows the rules which are relevant to their business unit. Through regular training, we ensure that potential antitrust violations are prevented, detected and punished.

Well functioning competition is a
fundamental pillar of our economy.

Every employee knows the rules
that apply to their unit.

04.2.4

EXPORT CONTROL AND SANCTIONS COMPLIANCE

As a globally active company, we observe applicable national and international economic sanctions and ensure strict compliance with person- and good-related sanctions. Foreign trade regulations must be generally observed as part of export controls when exporting goods, intangible assets – such as software – and technology transfer. Restrictions apply in general to military goods and civilian products that can also be used for military purposes (dual-use).

Special restrictions apply to certain goods and countries, such as arms or luxury goods **embargoes**.

Furthermore, we ensure compliance with sanctions restrictions through **sanctions list** screenings. All employees contribute to compliance with these foreign trade regulations within the scope of their responsibility and keep themselves up-to-date on current developments in sanctions.

GLOBAL



We ensure strict compliance
with sanctions on goods and people.

04.2.5

PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

We pursue an integrated compliance approach to preventing and combating **money laundering**, **terrorist financing**, organized crime and other corporate crime – which always takes applicable economic sanctions into account. After all, in addition to socio-political implications, these risks can potentially damage the reputation and financial integrity of Mercedes-Benz Group AG as well as its subsidiaries, shareholders and stakeholders.

We adhere to sanctions and support the fight against money laundering and terrorist financing.



04.2.6

INSIDER TRADING LEGISLATION AND AD-HOC ANNOUNCEMENTS

Misuse of inside information is prohibited. Our company is committed to fair securities trading. We take all necessary and appropriate actions to prevent **insider trading** at our company.

We are committed to fair securities trading and guard against insider trading.

We do not use confidential information to gain an advantage in stock trading.

As a stock-listed company, Mercedes-Benz Group AG is under a legal obligation to publish Mercedes-Benz-related inside information without delay in the form of an **ad-hoc announcement**.

As long as the announcement has not been published, the respective information may not be shared without authorization or used for securities transactions.

Information that could have a significant effect on our share price is promptly disclosed by us in the form of an ad-hoc announcement.

Examples of possible insider information include unexpected:

- Financial results
- Changes in earnings projections or order situation
- Significant factual deviations from previously published company targets
- Changes in dividend
- Planned mergers, partnerships or takeovers
- Significant technical innovations
- Important changes in management organization
- Changes in important business relations

All employees help to ensure that inside information is published without delay and in a legally prescribed manner. Until such time, the information may only be made available to individuals who require the information to perform their duties. Those persons who possess inside information are prohibited from trading – either personally or via third parties – in securities that could be affected by the confidential information.

04.2.7

CORRUPTION PREVENTION

At Mercedes-Benz, we have a clear understanding of what kind of business we will or will not do. We do not give or take bribes. We impress our **business partners** and customers with our products and services, not through undue influence. We also do not allow others to exert **undue influence** on us. Instead, we make decisions based on objective and verifiable reasons.

Mercedes-Benz does not tolerate corrupt behavior by its employees, **business partners** or customers. Decisions involving **corruption** distort competition, harm the company's assets and reputation, and go against the common good. To prevent possible harm to Mercedes-Benz, we avoid even the mere appearance of **undue influence**.

We do not give or take bribes.

We do not leave any room for corruption because it is detrimental to competition and the common good.

We also act in accordance with our Corporate Principles, especially when in contact with government agency employees, public officials, politicians and employees of government-owned enterprises. We avoid even the mere appearance of **undue influence**, for example through monetary payments, non-cash **rewards** or other benefits. We follow this rule even if such activities are expected or allegedly common for official actions or to expedite official actions (Facilitation Payments).

Through regular training and audits, we ensure that corrupt behavior is prevented, detected and punished.

In our dealings with authorities, we avoid the merest hint of undue influencing.

04.3.1

CHOOSING BUSINESS PARTNERS

Mercedes-Benz expects compliance with our principles and laws not only from our employees, but also from **business partners**.

We subject **business partners** to a risk-based **integrity check** before the contract is concluded. The employees responsible for selecting our **business partners** are obligated to screen them to the legally allowed extent as part of a transparent selection process. In this way, we ensure that the potential **business partner** meets our expectations for the cooperation.

Mercedes-Benz also expects ethical conduct from its business partners.

INTE GRITY

We subject potential business partners to a risk-based integrity check.

Even after the contract has been finalized, we expect our **business partners** to comply with these requirements, to act in line with these value benchmarks and continuously evaluate them.

Our **business partners** are required to communicate the legal and contractual requirements relevant to the business relationship between Mercedes-Benz to their employees and associated third parties, and to ensure compliance with them.

In the event of potential violations of these requirements on the part of our **business partners**, the responsible employees must work together with the **business partner** to resolve the situation

Tomorrow drives
Mercedes-Benz.

04.3.2

GIFTS AND INVITATIONS

We reject inappropriate rewards from business partners.

When dealing with **business partners** and customers, gifts and invitations (collectively referred to as **rewards**) are common practice and permitted within appropriate limits. To prevent Mercedes-Benz from suffering **reputational damage** and financial loss, our decisions are based on objective and verifiable reasons and are not influenced by inappropriate **rewards**.

As employees, we do not encourage, ask for or demand gifts, invitations, personal services or favors for ourselves or others from **business partners**. We reject **rewards** when they can give rise to even the mere appearance of **undue influence**. When granting or receiving discounts and rebates, we take care to ensure they are appropriate.

Advertising items and occasional gifts given voluntarily can be accepted if of reasonable value and scope. We accept invitations from **business partners** to dinners or events only if they are freely given, serve a business purpose, do not occur with excessive frequency and if the invitation is appropriate for the occasion.

Invitations must serve a business purpose and be appropriate for the occasion.

Rewards are permitted within appropriate limits.

We document the acceptance of rewards above the reference values.

As an amount that can be seen as appropriate, we have set a reference value of 50 euros for gifts from third parties and a value of 100 euros for invitations from third parties. In case of doubt whether a gift or an invitation is appropriate, we consult with our manager.

If we receive **rewards** that exceed our reference values, we disclose them and document that we have received them. Reporting obligations pursuant to legal requirements, such as tax law, still apply.

When receiving rewards from third parties, we orient ourselves to defined reference values.

Also when giving gifts and invitations to our **business partners** and customers, we follow the principle that even the mere appearance of **undue influence** must be avoided. **Rewards** are permitted only when they have an appropriate value and are given in the context of ordinary business activities. We are cautious and especially critical when determining whether it is appropriate to give gifts and invitations to government agency employees, public officials, politicians and employees of government-owned enterprises.

Rewards given to business partners and costumers must me appropriate.

SUSTAINABILITY

For us, sustainability means creating lasting value for all stakeholders: customers, employees and investors as well as **business partners** and society as a whole. Economic, ecological and social responsibilities go hand in hand here – along the entire value chain. We translate this approach into our sustainable business strategy, embedding sustainability topics in the heart of our daily business.

Our sustainable business strategy is based on the regulatory requirements relevant to our business activities, recognized international frameworks, on the expectations of external and internal stakeholders, as well as on global trends. Meeting this responsibility is crucial for our long-term success.



04.4.1

RESPECT FOR HUMAN RIGHTS

Mercedes-Benz respects internationally recognized human rights. We are committed to, among others, the **International Bill of Human Rights**, the **United Nations Guiding Principles on Business and Human Rights** and the **Declaration on Fundamental Principles and Rights at Work** of the International Labour Organization (ILO).

Our **Principles of Social Responsibility and Human Rights** emphasize the particular value Mercedes-Benz places on respecting human rights and good working conditions. These Principles complement and specify our Integrity Code, and are binding for all employees of Mercedes-Benz worldwide.



We respect the internationally recognized human rights and the Fundamental Principles and Rights at Work.

Our Principles are binding for all employees worldwide.

04.4.2

ENVIRONMENTAL PROTECTION

We commit to prevent, and as far as possible mitigate and end, adverse impacts on human rights within our business operations around the world. Beyond our Mercedes-Benz Group companies, we encourage our **business partners**, in particular direct suppliers, to also respect human rights, and we strive to achieve that this is the case for indirect suppliers as well, and take appropriate measures.

We also pay close attention that our business partners respect human rights and good working conditions.

We give our best not only in the manufacturing of our products but also in our efforts to act responsibly toward the environment. Around the world, it is our ambition to achieve an exemplary ecological and energy balance, rising the increasing demands of consumers as well as current and future ecological challenges.

Around the world, it is our ambition to achieve an exemplary ecological and energy balance.



EFFICIENCY

Our aim is to develop products that are as sustainable and energy-efficient as possible in their respective market segment.

Our aim is to develop products that are as sustainable and energy-efficient as possible in their respective market segment. We are looking at the entire **life cycle**: from development to the supplier network, our own production, the electrification of our products, the renewable energy throughout the utilization phase of electric vehicles, and finally, the recycling of vehicles.

Furthermore, we want to increasingly decouple resource consumption from the growth of our production output by keeping as many raw materials as possible in circulation, thereby reducing the use of primary resources.

04.4.3

ANIMAL WELFARE

Our corporate responsibility also includes the welfare of animals. We expect our employees and **business partners** to comply with nationally and internationally applicable regulations as well as recognized ethical frameworks on animal protection and welfare.

04.4.4

REPRESENTATION OF POLITICAL INTERESTS

As a company that does business worldwide, we are part of the global political and social environment. We therefore take part in political and public processes of forming opinions as a trustworthy and dependable business partner. We engage in reliable and fact-based communication with governments, trade associations and organizations as well as social interest groups and incorporate their suggestions into our actions. When doing so, we take into account society's interest in transparency and openness.

We conduct a reliable dialogue with governments and organizations.

04.4.5

CORPORATE CITIZENSHIP

As a renowned and internationally operating luxury brand, we understand that we have a great responsibility to society. Through our corporate citizenship commitment, we want to make tangible contributions to the common good above and beyond our core business – worldwide.

Our corporate citizenship strategy already serves today as a guideline for the corporate citizenship activities of Mercedes-Benz Group AG. At the heart of our strategy is, on the one hand, our commitment to initiatives that support ecological sustainability – through decarbonization or the promotion of the circular economy and the conservation of natural resources. On the other hand, we support initiatives aimed at community empowerment through improved living standards and high-quality educational opportunities.

RESPONSIBILITY

Through our corporate citizenship strategy, we focus on the promotion of ecological sustainability and community empowerment.

We donate exclusively to institutions that are recognized as non-profit organizations. We do not pursue any economic self-interest with our donations. Rewards in return are neither demanded nor expected. By contrast, our sponsorship activities are conducted in order to promote the reputation and public perception of our company in a positive way through advertising.

We follow the laws and internal regulations governing donations, sponsorships and charity activities. Donations and other **rewards**, sponsorships and other benefits in kind made by Mercedes-Benz to political organizations (such as institutions of parties and governments) require special approval. Party donations are subject to a decision by the Mercedes-Benz Group AG Board of Management. Political contributions must also undergo a special approval process.

Donations to and the sponsoring of political organizations require special approval.

04.4.6

SOCIAL AND VOLUNTEERING ACTIVITIES

Volunteering keeps our society together. As a company that takes its responsibility towards the community seriously, we welcome and support **voluntary social work** by our employees, regardless whether such activities are conducted for charitable, social and/or democratic political organizations. The company also supports our employees' social activities with local, national and/or international organizations aligned towards the main focuses of our corporate citizenship strategy.

We support voluntary work by our employees.

04.5.1

HANDLING DATA

Digitization and transformation to sustainable mobility are creating new work processes, business areas and mobility concepts. Data enables innovative services that offer added value for our customers and employees.

The principles of our **Data Vision** outline how we leverage future opportunities and, in so doing, ensure and enhance trust in our digital products and services:

- Business Potential
- Consumer and Employee Benefit
- Data Quality
- Transparency
- Choice
- Data Security
- Data Ethics



TRUST

By adhering to the principles of our *Data Vision*, we handle data in a trustworthy manner.

We use personal data only to the extent permitted by law and the data subjects concerned.

We create trust among our employees, **business partners** and customers by respecting data protection as a personal right. That is why we process and use **personal data** only to the extent permitted by laws, regulations, our own **Data Vision** principles and the data subjects concerned.

These principles extend beyond data protection and describe the responsible and legally compliant handling of data as the basis for sustainable digital products and services. Our aim is to consider data protection from the very beginning, analyze data intelligently and store, share and use it responsibly. We are transparent with our employees, business partners and customers about how we handle their data and we provide them with the choice whether and how we use their data.

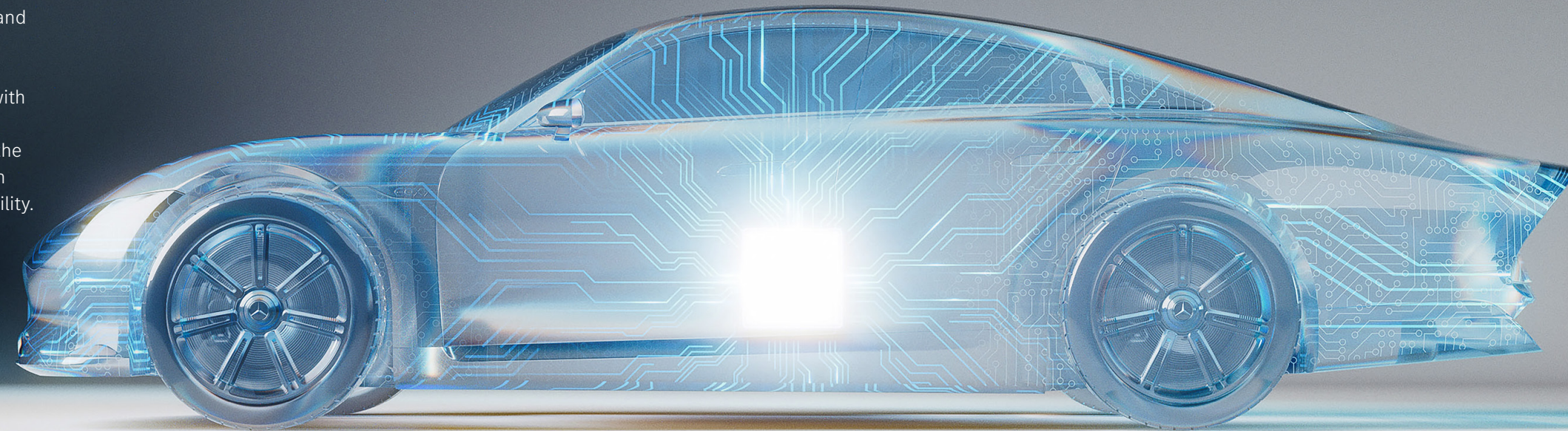
Those who entrust us with data should be able to count on it being safe with us. All employees are responsible for protecting **personal data** against unauthorized access by third parties and take measures necessary to prevent unauthorized usage.

04.5.2

ARTIFICIAL INTELLIGENCE

At Mercedes-Benz, we want to leverage the great potential of **Artificial Intelligence (AI)** and strategically promote AI innovations. AI has already been implemented in some of our products and processes and will have a growing impact on our products and working methods in the future.

At the same time, we are aware of the potential risks and uncertainties associated with new technologies such as AI. What matters is how we responsibly manage AI use. With our AI Principles, we have defined stringent ethical and legal principles for the responsible development and use of **Artificial Intelligence**. In doing so, we focus on the Responsible Use of AI, Explainability, Protection of Privacy, Security and Reliability.



04.6.1

MANAGING ERRORS

We handle mistakes honestly and openly. We support each other to learn from mistakes and share our experiences to enable further development and innovation.

The prerequisite for this is to shape our corporate culture in such a way that wrong decisions are identified, discussed, and corrected.

It is up to each of us to take responsibility and create – or demand – a work environment where everyone can openly address mistakes. We treat employees who disclose mistakes fairly and responsibly.



ERROR
CULTURE

04.6.2

TREATMENT OF VIOLATIONS

Violations of laws, policies and other regulations can cause massive financial losses, involve the risk of fines being imposed on Mercedes-Benz and its employees, do **damage to our image and reputation**, result in permits not being granted and cause us to be excluded from local markets. Violations must therefore be identified in good time in order to prevent damage to Mercedes-Benz, its employees and third parties, as well as to protect persons harmed by misconduct and to ensure fair cooperation. If we as employees observe rules or regulations being violated at Mercedes-Benz or by one of our **business partners**, or have reason to suspect that a violation of a rule or regulation has been committed, we do not hesitate to address it.

The **whistleblower system BPO (Business & People Protection Office)** is open to all employees and third parties who wish to report violations of rules or regulations that pose a high risk to the company, its employees and other individuals. Violations with high risk include for example **corruption**, antitrust law and **money laundering** offenses as well as violations of human rights, technical specifications or environmental regulations. You can contact the **BPO whistleblower system** through the protected reporting channel available on the Mercedes-Benz website.



If employees wish to report other potential violations involving risk, **other contact points** are available, particularly their respective supervisor or the HR contact person. The BPO whistleblower system accompanies the processing of tip-offs until the case has been closed. While doing so, it strives to maintain the highest possible level of confidentiality.

Moreover, our **BPO whistleblower system** places value on fairness – in dealing with whistleblowers, injured parties, and employees affected by an allegation. The BPO always applies the principle of proportionality. We examine each case individually to determine what consequences are suitable, necessary and appropriate.

O RIEN TATION

05 Support and Assistance

For questions about our Integrity Code or if we need support, we can always turn to our manager or colleagues. Additionally, we can also contact the 'Infopoint Integrity' as a central contact point for all matters related to integrity. If we need expertise on a specific topic, we can contact the subject matter experts directly.

The applicable version is the one currently available in the Enterprise Regulations Database (ERD) on the social intranet.

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