

Our Integrity Code



Doing the Right Thing.

Mercedes-Benz



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Foreword

Dear employees,

Mercedes-Benz is becoming a luxury and technology company. Our goal is to build the most desirable vehicles in the world. That means that we – the company as a whole, as well as every single individual – have to act responsibly. We need to live up to this commitment, especially in times of change.

Today's biggest challenge is the transformation towards sustainability. When the company engages on sustainability, we mean it holistically. We are becoming climate neutral, standing up for social issues and insisting on responsible corporate governance. Integrity plays a crucial role. Together with sustainability and diversity, integrity helps establish the foundation of our strategy. That is because only those who act with integrity, concern for the environment and with respect for the law will remain successful in the long run.

Acting with integrity means doing the right thing. That sounds easier than it is on a daily basis. The world is becoming more and more technologically and legally complex, and we often find ourselves facing challenges to which there are no obvious solutions. That is why it is important for us to base our conduct on clear principles. Our Integrity Code is intended to serve as a guide for you. Employees from all over the world and from different corporate units have helped to create it and update it. It serves as the standard for the shared values at Mercedes-Benz and guides us in making judgment calls.

As a company, we bear a responsibility towards society, the environment and our stakeholders the world over. Our desire is to fulfill that responsibility on our path of transformation. We firmly believe that luxury and integrity are not mutually exclusive. On the contrary, integrity is a foundation of true, modern luxury. If we act accordingly, Mercedes-Benz will continue heading in the right direction in the future.

01 Introduction



At Mercedes-Benz, we strive to always do our best.

Those who work at Mercedes-Benz¹ know that we strive to always do our best. We want to build the world's most desirable vehicles. This [commitment to excellence](#)² also applies to how we deal with each other, our customers and our business partners. We are also aware of our social responsibility and aim to fulfill it.

Our company is a founding member of the UN Global Compact and is committed to its global responsibility.

As a founding member of the [United Nations Global Compact](#), we are committed to respecting human rights, respecting the rights of employees and their representatives, protecting the environment, enabling fair competition and fighting against [corruption](#).

¹ When this Integrity Code mentions "Mercedes-Benz," it refers to Mercedes-Benz Group AG and controlled Group companies of the Mercedes-Benz Group.

² Color-coded terms in the main text are explained in the glossary.

We expect all of our employees to act with integrity.

The only way for us as a company to set an example on a global scale is if we work responsibly at the local level – on every shop floor and in every office. We do not tolerate any unlawful or inappropriate conduct, which conflicts with this Integrity Code. Accordingly, the provisions of this Code are **binding** for all employees of Mercedes-Benz Group AG³ as well as all employees at controlled Group companies.

Sustainability, integrity, and diversity are the foundation of our work.

Our work is based on sustainability, integrity, and diversity. These three components provide us with support and guidance for our day-to-day activities.

³ To make this policy easier to read, the text uses only one form of pronouns for natural persons. In terms of content, people of all gender identities are always intended. The term "employee" also includes managers at all levels and members of managing bodies.

02 What We Stand For: Our Understanding of Integrity and Our Corporate Principles



Integrity plays
a central role
at Mercedes-Benz.

Integrity plays a central role at Mercedes-Benz and shapes how we perceive ourselves. This Integrity Code cannot anticipate every situation in which we have to make a decision. We also take responsibility in situations for which there are no clear rules or in which they can be interpreted in different ways.

Integrity means doing the right thing. That means we follow internal and external rules, act in accordance with our corporate principles and, in doing so, also listen to our inner compass. We share and practice these **five corporate principles**:

Our corporate principles

When working, we aim to strike a balance between profitability, people and the environment.

We are profitable and are committed to people and the environment

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 of 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. Sustainable treatment of the environment is important to us, which is why we protect it and use our resources responsibly. Our aspiration is to strike a balance between profitability, people and the environment.

We follow laws and rules and take responsibility.

We act responsibly and respect the rules

At Mercedes-Benz, we take responsibility for our actions and decisions and we also follow the rules. That means we comply with laws as well as internal and external rules, agreements with employee representatives, voluntary commitments and this Integrity Code. We make decisions conscientiously. Everyone is urged to reflect this in their own behavior.

Honesty, openness and transparency are the foundations of our behavior.

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.

Our collaboration is based on trust, fairness and respect.

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.

The diversity of our workforce is one of our strengths.

We practice diversity

At Mercedes-Benz, diversity is not 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.

03 How We Work: Our Behavior Guidelines



Principles for Working Together

The conscientious leveraging of diversity and individuality is part of our corporate strategy.

Discrimination is not tolerated – our goal is to achieve equal opportunity.

Diversity and equal opportunity

At Mercedes-Benz, we appreciate the differences between our employees. This is why diversity and **inclusion** are part of our corporate strategy, which addresses the **conscientious** leveraging of diversity and individuality. As we are a global company, this is crucial to our success.

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. **Equal opportunity** for all is our goal. **Discrimination** of any kind is not tolerated.

We do not discriminate against the following:

- Gender or gender identity
- Race, origin or nationality
- Social background
- Religion or ideology
- Sexual orientation
- Physical and/or mental abilities
- Disability
- Age
- Political, social or union affiliation.

We establish a culture of appreciation – bullying has no place in our company.

At Mercedes-Benz, we respect the individual rights of our employees. We establish a culture of **appreciation and respect** in which we can express ourselves as individuals in order to live up to our full potential at work. Any form of **discrimination**, harassment, unfair conduct or **bullying** goes against who we are and has no place at Mercedes-Benz. It is our shared duty to create a fair, respectful and friendly working environment.

Safe working conditions are one of our top priorities.

Health and safety

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 everyone can perform to the best of their ability while maintaining their physical and mental health.

We want to prevent work-related accidents and illnesses.

High technical and workplace safety standards are crucial to our work. Their purpose is to prevent work-related accidents and illnesses. We expect our employees to play an active role in the process.



Health and safety

The health, safety and well-being of our employees at Mercedes-Benz have high priority.

We all bear responsibility for occupational health and safety at work.

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 and drugs. We make sure not to endanger our own safety or the safety and well-being of others.

Mercedes-Benz offers its employees prevention programs for their health.

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
- Counseling service

Mercedes-Benz creates conditions that support a work-life balance.

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.

We weigh our personal interests against the company's interests carefully.

Conflicts of interest

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.

If conflicts of interest arise, we disclose them.

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** arise, we disclose them and seek a solution with the respective manager which does not harm the interests of our company.



Work-life balance

Mercedes-Benz creates conditions that support a work-life balance.

[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
- Invest in competitors

Work with employee representatives

[We engage in constructive collaboration with employee representatives.](#)

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 the employees. Even in cases of conflict, the shared goal will be to lay and preserve a firm foundation for **constructive collaboration**.

Use of company resources

[We use company resources carefully and sustainably.](#)

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 use company resources only for official purposes.](#)

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. [Wastefulness](#) in the use of resources diminishes the company's assets and may also cause [reputational damage](#). We therefore make sure that we ourselves and those around us use company resources responsibly and economically.

[We protect information because it is valuable.](#)

We also treat information responsibly because it is one of our most important assets. Information security and data backups are therefore extremely important to Mercedes-Benz. Regardless of whether we are meeting with business partners or attending private events, we make sure that we do not disclose information about Mercedes-Benz that gives people outside of Mercedes-Benz unauthorized insight into our business processes. We are also aware that if we intentionally share information with third parties about internal matters, this can harm Mercedes-Benz. We take responsibility for the information we handle by applying general conditions for **information security**.

Special protection is given to business secrets.

Trade secrets – for example, inventions, new products or vehicle designs – secure our advantage over our competitors. We therefore protect this information to a particularly high standard. We comply with laws and internal regulations for protecting business secrets and respect the business secrets of our competitors, business partners and customers.

Intellectual property protection

Mercedes-Benz Group AG owns numerous **patents** and other property rights such as **trademarks** and **designs**. They are among the company's most important assets and enable Mercedes-Benz to stay competitive, active and innovative. 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.

Mercedes-Benz Group AG owns numerous patents and other property rights. They are among the company's most important assets that we must protect.



Intellectual property protection

Our patents are some of our most important resources and must be protected.

We coordinate external publications with the Communications unit.

Representing Mercedes-Benz

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

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

When appearing in public, we ensure that our personal views are designated as such.

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.

Compliance with Laws

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

We use technological advancements to reduce emissions and greenhouse gases.

We ensure the regulatory conformity of our products.

Compliance with product requirements

For us at Mercedes-Benz, the safety and quality of our products has 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**.

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, autonomous driving and our new software architecture.

In fact, 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**. In cases of unclear legal framework conditions, our employees find guidance in our **corporate principles** as well as established and communicated structures and procedures.



Compliance with product requirements

The quality of our products is one of the top priorities for us at Mercedes-Benz.

As experts, we strengthen the confidence in our products.

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 legal and internal requirements as well as the expectations of our customers and society, helping to strengthen their confidence in our products.

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

We know the regulations that affect 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 **potential risks** in our areas of responsibility (**speak-up culture**).

We comply with applicable tax and customs regulations.

Tax and customs regulations

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 the customs duties and excise tax to be paid on imports of goods.

We reject aggressive tax avoidance schemes.

Correct and timely declaration 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.

Well-functioning competition is a fundamental pillar of our economy.

Antitrust law

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.

We are committed to protecting fair competition.

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 the permissibility of sales incentives
- When engaging in trade association activities.

Every employee knows the rules that apply to their unit.

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.

We comply with all regulations under foreign trade laws.

Export control

Strict compliance with export control under foreign trade legislation is a basic principle for global companies like Mercedes-Benz. Foreign trade regulations must always be observed when exporting both tangible and intangible goods (such as software) as well as services. Fundamental restrictions are placed on **military goods** and **civilian products** that can also be used for military purposes (**dual use**).

We act with strict compliance regarding embargoes.

Furthermore, certain goods and countries fall under special restrictions, such as **arms or luxury goods, embargoes** and **sanctions**. Every employee ensures strict compliance with regulations under foreign trade laws applicable to their area of responsibility.

We observe sanctions and support the fight against money laundering and terrorism financing.

Economic sanctions and money laundering prevention

As a global corporation, we comply with national and international **economic sanctions** and support the community of states to **fight against money laundering and terrorism financing**. Mercedes-Benz complies with all requirements in these areas.

We design our business processes so that they prevent financial crime.

Employees of the involved units are required to always keep up to date on current **sanctions lists**. The employees responsible for the business processes are obligated to design these in such a manner that they prevent all forms of financial crime.

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

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.

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

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.

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.

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

All employees help 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.

We do not give or take bribes.

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 and not through **undue influence**. We also do not allow others to exert undue influence on us. Instead, we make decisions for objective and verifiable reasons.

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

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.

When dealing with government authorities, we avoid the mere appearance of an undue influence.

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** and 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.

Dealing with Business Partners

Gifts and invitations are permitted within appropriate limits.

Gifts and invitations

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** or financial loss, we base our decisions on objective and verifiable reasons and are not influenced by inappropriate **rewards**.

We reject inappropriate rewards from business partners.

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.

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

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.



Gifts and invitations

When dealing with business partners and customers, gifts and invitations within appropriate limits are common practice and permitted.

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

We document the acceptance of rewards above the reference values.

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.

Rewards given to business partners and customers must be appropriate.

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.

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

Choosing business partners

Mercedes-Benz expects its employees to comply with our Integrity Code and laws. Mercedes-Benz also expects its **business partners**, such as **suppliers and sales intermediaries**, to do the same.

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

Depending on the specific risk, we conduct an **integrity check** on our business partners before entering into any contracts. The employees responsible for choosing the business partners are obligated to screen them to the extent allowed by law using a **transparent selection process**. This process ensures that potential business partners fulfill the requirements and standards of this Integrity Code.

Our business partners are required to comply with our Integrity Code.

Even after entering into contracts, we expect our business partners to comply with these requirements. They undertake to base their actions on these values and continuously reflect upon them.

Our business partners are also urged to require their suppliers to comply with our Integrity Code.

Our business partners are urged to communicate the Integrity Code and the resulting obligations to their employees and suppliers.

In the event of potential **violations** of the requirements of this Integrity Code by business partners, the responsible employees must work together with the business partner to resolve the situation.

Sideline activities and governing body memberships

Paid sideline activities (in particular, outside employment) by our employees must be disclosed to the responsible manager before employment starts. The manager will review whether the sideline activity might interfere with the employment duties or pose a **conflict of interest**. If there is a **conflict of interest** or interference with employment duties, the sideline activity can be prohibited.

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

We engage in sideline activities only if they do not result in a conflict of interest.

The assumption of offices for other companies requires approval.

Shareholdings

Owning shares in business partners or competitors must not result in a conflict of interest.

Shares held in business partners or competitors must be disclosed.

As employees, we can acquire and hold shares and interests in business partners or competitors only if it is a **small-scale investment** and the possibility of a **conflict of interest** or the appearance of a **conflict of interest** 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.

Sustainability and social responsibility

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

Our Principles are binding for all employees and managers worldwide.

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

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 International Labour Organization's \(ILO\) Declaration on Fundamental Principles and Rights at Work](#).

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 managers and employees of Mercedes-Benz worldwide.

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 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 with indirect suppliers likewise, and take appropriate measures.

Animal welfare

We comply with national and international legal requirements for animal welfare as well as recognized framework guidelines that define ethical principles in this context. We also expect that our business partners follow these regulations.

Environmental protection

We endeavor to achieve exemplary environmental and energy performance worldwide.

Our ambition is to develop products that are particularly environmentally compatible and energy efficient along the entire value chain.

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

Our ambition is to develop products that are particularly environmentally compatible and energy efficient in their respective market segments. Our approach to environmentally compatible and energy-efficient design covers the entire product spectrum of Mercedes-Benz, taking into account the automotive life cycle from the supply chain to production and disposal of the vehicles.

We design every stage of production to be as environmentally compatible and energy efficient as possible in order to reduce our environmental impact and energy consumption. We take internal and external measures to ensure transparency concerning our environmental impact.

One of our most important corporate objectives related to environmental protection is CO2 neutrality. We have incorporated that into our **sustainable business strategy**.

Our goal is for our entire new vehicle fleet to be carbon-neutral throughout the value chain by 2039. We want to separate the consumption of resources further and further from the growth in our production output. We are committed to reduce the number of resources used per vehicle. To reduce the consumption of energy, water and waste, we are also working constantly to make our production processes more efficient and environmentally compatible.



Environmental protection

We strive to achieve exemplary environmental and energy performance worldwide.

We conduct a reliable dialogue with governments and organizations.

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**.

As a global company and luxury brand, we have a great responsibility to society.

Donations and sponsorship

Our corporate citizenship strategy places a clear focus on the promotion of environmental sustainability and social responsibility. As a global company and luxury brand, we understand that we have a great responsibility to society. We want to make a real difference in society – around the world – that exceeds our core business.



Donations and sponsorship

For us, business success and social responsibility go hand in hand.

Our corporate citizenship strategy places a clear focus on the promotion of environmental sustainability and social responsibility.

Our **corporate citizenship strategy** places a clear focus on the promotion of environmental **sustainability** and social responsibility. We firmly believe that the access to education in these areas will be the key to meeting the major challenges of our time and to enhancing stability, prosperity and social responsibility. This stems from our view that great ideas and creativity can be found equally all over the world, but opportunities cannot. We stand for a society that respects human rights, believes in education for a better future and does not permit **discrimination**.

When making donations, we do not expect anything in return.

Donations are made only to organizations that have been recognized as charitable institutions. We do not make donations in the pursuit of self-serving financial interests; we neither demand nor expect anything in return. By contrast, our **sponsorship** activities are conducted in order to positively promote the reputation and public perception of our company through advertising.

Donations to and sponsorships involving political organizations require approval.

We follow the laws and internal regulations governing donations, sponsorships and charity activities. Donations and other contributions, sponsorships and monetary benefits that Mercedes-Benz gives to **political organizations** (e.g. political parties and governmental institutions) 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.

We support volunteering by our employees.

Volunteering

Volunteering strengthens society. As a company that takes its responsibility to society seriously, we encourage and support the **volunteer activities** of our employees. We do so regardless of whether those activities are in support of charitable giving, social activities or democratic institutions.

Digitization

Digitization is creating new opportunities that we want to exploit responsibly.

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](#) describe how we want to exploit future opportunities and focus on the needs of our customers and employees:

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

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

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 themselves.



Handling data

Digitalization is creating new opportunities that we want to exploit responsibly.

Our employees, business partners and customers should be able to trust that their data is safe with us.

These principles extend beyond data protection. They describe the responsible and legally compliant handling of data as a whole, even if the data is not personal. 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 of whether and how we use their data.

We protect the data of our employees, business partners and customers from being accessed by third parties.

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

Social networks are having a stronger and stronger influence in shaping public dialogue.

Social media

Social networks and media are playing an increasingly important role in public dialogue. We, too, use social networks and social media channels to communicate with our employees, business partners, customers and the public.

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

We are an open-minded, global organization. As described in our **corporate principles, integrity, appreciation and respect are important** for us. This also applies to protecting the privacy of our employees. We do not tolerate any hate-filled, derogatory or discriminatory posts on social media.

Examples of other unacceptable posts include those which:

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

Artificial intelligence is used to attempt to automate intelligent skills.

Artificial intelligence

Artificial Intelligence (AI) comprises various methods used to attempt to automate intelligent skills. Today, the broadly defined term "AI" is often used in a narrower sense of current progress in the field of machine learning. AI has already been implemented in some of our products and processes and will have a greater and greater impact on our products and working methods in the future.

To sustainably leverage the opportunities afforded by artificial intelligence to our benefit, we follow our AI principles. These include ethical and legal principles for the development and use of artificial intelligence. They address responsible deployment of artificial intelligence, explainability, privacy protection as well as security and reliability.



Artificial intelligence

We design and use AI responsibly.

04 Complying with the Integrity Code



All employees are required to know the content of the Integrity Code and act accordingly.

Our business partners are also expected to follow the Integrity Code.

Scope of Application

This Integrity Code applies to all employees. All employees are required to familiarize themselves with this Integrity Code, know it and comply with its provisions. If specific policies or other regulations have been enacted, then they are binding.

Our **business partners** are also expected to follow the Integrity Code. We also expect our business partners to know and comply with this Integrity Code. Anyone who does not share the principles described in this Integrity Code cannot do business with us.

Mercedes-Benz expects its managers to set an example for others.

What we expect of our managers

Responsible conduct requires responsible managers. Mercedes-Benz therefore expects managers at every level to fulfill their duty to **set an example** by behaving ethically, thereby giving employees guidance. Our managers are committed to excellent performance. At all times, they observe our **corporate principles and behavior guidelines** and the provisions of this Integrity Code. As they do, they serve as inspirational examples to their team members.

Managers promote a culture of respectful interaction.

Our managers behave with **respect** towards their team members and promote team spirit within their units. They provide their team members with the appropriate knowledge and enable them to act responsibly. Managers explain the reasons for their decisions to their team members in order to enlist their support for objectives. Managers promote a culture of respectful interaction.

As individuals and an organization, it is our desire to learn from mistakes.

Managing errors

Part of who we are involves **learning from mistakes** as individuals and as an organization. Our approach to managing errors is therefore transparent and open, and we share our experiences in order to enable progress and innovation.

Our error management culture leads to openness, fairness and trust.

Our error management culture leads to openness, fairness and trust. This requires shaping our corporate culture in such a way that wrong decisions are recognized, discussed and corrected. It is up to every one of us to take responsibility and create a work environment in which employees have no concerns about speaking up about possible errors. We treat employees who disclose their mistakes with fairness and responsibility.

If we observe a violation of rules or regulations, we do not hesitate to address it.

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. For these reasons, violations must be detected in a timely manner in order to prevent Mercedes-Benz, its employees and business partners from suffering harm, thereby ensuring fair treatment of one another. If we as employees observe rules or regulations being violated at Mercedes-Benz or 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.

Our whistleblower system BPO is open to all employees, business partners and third parties.

The **whistleblower system BPO (Business Practices Office)** is open to all employees, business partners and third parties who wish to report violations of rules or regulations that pose a **high risk** to the company and its employees. Violations with a **high risk** include for example, offenses relating to corruption, breaches of antitrust law and violations of anti-money laundering regulations violations of human rights, severe violations of engineering specifications and violations of environmental regulations They can send an e-mail to bpo@mercedes-benz.com to contact the **BPO**.

Confidentiality and fairness are the most important principles of the BPO.

If employees wish to report violations posing a minor risk, the company has **other contact points** available for them to contact.

The **BPO** accompanies the processing of tip-offs until the case has been closed. While doing so, the **BPO** strives to maintain the highest possible level of **confidentiality**. Moreover, our whistleblower system places value on fairness – in dealing with both whistleblowers 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.

Support and assistance

Employees can find additional information about the Integrity Code on our intranet.

This Integrity Code cannot provide specific answers to every question and situation. If you are unsure and need guidance for your daily activities at work, you can find more detailed information and points of contact as an employee on our **website "Our Integrity Code"** on the intranet.

If you have questions about integrity or this policy, the **Infopoint Integrity** will be happy to assist at info.integrity@mercedes-benz.com.

05 Glossary



- Ad-hoc announcement** Public announcement by a listed company. Such announcements include insider information, i.e. information related to the company which might affect stock market prices of the company's shares.
- Artificial intelligence** There is no universally consistent definition of artificial intelligence (AI). We have the following understanding: artificial intelligence includes various methods that attempt to automate intelligent skills. The broad term "AI" is often used today in the narrow sense of the current advances in machine learning. "ML" Machine learning is a subset of AI methods and is based on mathematical methods that find complex patterns in datasets. These systems can learn with algorithms and data. Deep learning, in turn, is a sub-area of machine learning. It makes it possible to find complex patterns in very large amounts of data using (deep) neural networks. (Deep) neural networks DL systems can generally create higher-quality forecasts than ML machine learning algorithms, but are associated with a higher complexity.
- Bullying** Prolonged, successive and overarching animosity, victimization or discrimination hurting the affected person.

Commitment to excellence Aspiration to create exceptional services and products in order to become a market leader in the respective sector.

Conflict of interests A conflict of interests may arise whenever personal or individual financial interests collide with those of Mercedes-Benz or its business partners. If the conflict of interests cannot be resolved, the individual may need to be removed from a certain office or function. Conflicts of interest may arise in connection with gifts, invitations, sideline activities, executive committee memberships with other companies, and shareholdings in competitor companies.

Core labor standards of the International Labour Organization (ILO) Social standards created by the International Labour Organization (ILO) within the world trade order to ensure decent working conditions and worker protection.

Corporate principles and behavior guidelines Corporate principles are basic guidelines that describe our self-image. They guide employees in their day-to-day operations and are to be shared and lived by all employees. Behavior guidelines are specific rules that are binding for all employees. They are in keeping with the corporate principles and the mandatory internal and external guidelines.

Corruption Abuse of an office or position in order to obtain an advantage. One common instrument of corruption is bribery.

Data Vision The aspiration of Mercedes-Benz concerning the handling of data: We stand for sustainable, data-based business models. That is why we are focusing on the needs of our customers and employees and handling data responsibly. The Data Vision follows seven principles: Business Potential, Consumer Benefit, Data Quality, Transparency, Choice, Data Security and Data Ethics.

Declaration on Fundamental Principles and Rights at Work The "Declaration on Fundamental Principles and Rights at Work" was adopted in 1998 at the 86th International Labour Conference of the International Labour Organization (ILO). The declaration enhanced the special political importance of the ILO core labor standards. All member countries of the ILO expressly agree to these core labor standards.

Design A design is an industrial intellectual property right that gives its owner an exclusive right to use an aesthetic appearance (form, color, shape) and covers the external appearance of two- or three-dimensional products, graphic user interfaces or parts thereof.

Discrimination Applying categories (such as social background, gender, skin color, religion, etc.) to create, explain and justify unequal treatment without objective reason.

Diversity Individual differences within a group of people like gender, age, origin, sexual orientation and other characteristics.

Ecological and energy balance Ratio of energy consumption to energy use, especially in terms of impact on the environment.

Embargo Government order prohibiting or restricting trade with a specific country.

Equal opportunity To employ, support and promote all employees according to their skills, capabilities and performance irrespective of gender, age, origin, religion and other personal characteristics.

Global Compact of the United Nations The Global Compact is an initiative of the United Nations introduced in 2000. It defines 10 principles for fair, environmentally and socially compatible globalization practices. More than 13,000 companies are part of the initiative. Our company is a founding member of the United Nations Global Compact.

Inclusion The conscious, integrative and appreciative approach to diversity, with the objective of including and treating all employees in an equal and fair manner.

Insider trading Stock exchange transactions where an investor uses previously unreleased relevant information that would heavily affect stock prices after its publication in order to gain an advantage over other investors.

Integrity check Measures to verify that potential and current business partners comply with the Mercedes-Benz value standards and, for example, do not engage in unfair or illegal practices.

International Bill of Human Rights Consisting of the Universal Declaration of Human Rights, the International Pact on Civil and Political Rights and its two Optional Protocols and the International Pact on Economic, Social and Cultural Rights.

Life cycle All product life stages: from the supply chain to in-house production to the use and disposal of the vehicles.

Money laundering Channeling of illegally generated funds into the legal economic cycle.

One Voice Policy Uniform principles in external communication. The aim of the One Voice Policy is to ensure company-wide, consistent and coherent communication based on uniform publication principles. For this reason, employees who are authorized to communicate with the media should only communicate information approved by the Communications unit. This does not apply to sales-supporting means of communication media, such as product brochures or price lists, for which the Marketing unit is responsible.

Other contact points To report violations of low risk, employees can contact, for example, their managers, the responsible Human Resource department, Corporate Security or the works council.

Patent Industrial property right granted for a technical invention solution that is registered for products and procedures.

Personal data All information directly or indirectly related to an individual including, for example, name, address and age.

Regulatory conformity Regulatory conformity in the context of product safety and conformity to technical regulations means compliance with national and international legal requirements, technical norms and standards, the state of the art in science and technology, and Mercedes-Benz guidelines, as far as they stipulate technical standards.

Reputational damage Damage to a person's or a company's public image. Actions causing reputational damage include violations of laws, internal and external rules and contracts. Antitrust violations, insider trading and bribery can pose an especially high risk.

Rewards Umbrella term for gifts and invitations.

Sanction International coercive or penalizing measures against people, organizations or companies from other countries. Typical sanctions are embargoes that are placed on international and national sanction lists.

Supervisory Board Highest control committee of Mercedes-Benz Group AG, whose main purpose is to supervise the executive management, i.e. the board of management.

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| Sustainability | Both present and future-oriented operating principles aimed at reconciling economic, ecological and social aspects. |
| Social media | Platforms and networks where private users as well as public institutions and companies may upload their own content and posts, such as photos and videos, share experiences and views, and comment on or review the content of others. |
| Speak-up culture | Corporate culture where uncertainties and potential risks can be reported to the appropriate contact person. This is to encourage each individual to freely voice their opinion and criticism. |
| State of the art in science and technology | The state of the art in science and technology refers to expertise in the scientific fields, i.e. all of the science and technology that is generally accepted and is publicly available. Therefore, it does not relate to the scientific and technological knowledge available to a single manufacturer. In objective terms, it pertains to any state of the art in science and technology that is known regardless of country. |

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| Terrorist financing | Provision of (legal and illegal) assets to persons or organizations (that are generally found on sanctions lists) in a terrorist environment that can be used to carry out terrorist activities. |
| Trademark | Trademarks are signs that distinguish products and services of an enterprise from those of other enterprises. Words, pictures, sounds, three-dimensional shapes, colors or other signs can be registered as trademarks in the Register of the DPMA (German Patent and Trade Mark Office), provided they can be represented graphically. German trademarks last for ten years and can be renewed indefinitely thereafter. |
| Undue influencing | Exertion of influence on a person by means of rewards, such as donations or non-cash gifts. |
| United Nations Guiding Principles on Business and Human Rights | The UN Guiding Principles on Business and Human Rights are a set of international guidelines for preventing human rights violations in the context of business activities. They also address the responsibility of business enterprises in this context. |

Volunteering Voluntary, uncompensated work designed to serve the public good.

Wastefulness Careless, excessive use of corporate resources.

Whistleblower system BPO (Business Practices Office) The whistleblower system BPO (Business Practices Office) is open to all employees, business partners and third parties who wish to report violations of rules or regulations that pose a high risk to the company and its employees. Violations with a high risk include, for example, offences relating to corruption, breaches of antitrust law and violations of anti-money laundering regulations, violations of human rights, severe violations of engineering specifications and violations of environmental regulations.

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

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