

# DAIMLER TRUCK

## Daimler Truck Code of Conduct Guideline to doing the right thing



**YOU**   
**MAKE**  
**US** **YOUR BEHAVIOR  
MAKES THE  
DIFFERENCE**

# Foreword

of the Board of Management of Daimler Truck



**Martin Daum**

Chairman of the Board of Management, additionally responsible for Finance and Controlling



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Responsible for the regions Europe and Latin America and the Mercedes-Benz Truck brand



**Stephan Unger**

Responsible for Financial Services

Dear Colleagues,

We all make countless decisions every day. Sometimes we are guided by reason, sometimes we act on a “gut feeling”. Our own values play a crucial role and ultimately determine the success and failure of our actions.

In addition to our private lives, this naturally also applies to our day-to-day work. At Daimler Truck, we want lasting success and to create value for all who keep the world moving. We want to develop advanced technologies for our customers, build amazing vehicles and offer intelligent services.

In order to achieve our common goals, we rely on values such as trust and integrity and on common principles about how we approach our work: We listen closely to what our customers have to say. We want to understand them. This is the only way we can meet their needs and really solve problems. We know that together we will reach our goal faster. For us, teamwork is not just lip service – it is part of our everyday life. We learn from each other and develop new technologies together, across brands and divisions.

So, how can we put these values and principles into practice in a binding and consistent way in our day-to-day work? Our Daimler Truck Code of Conduct provides us with guidance for our actions and helps us to make the right decisions. The only way for us as a company to set an example on a global scale is to act in an ethically and legally responsible manner at local level – on every production floor and in every office – completely independently of the area of responsibility or hierarchy level: Each and every one of us has a responsibility to act with integrity – towards our customers and business partners, our colleagues, society, all who keep the world moving – and ourselves.

It's up to us: Let us lead by example as a responsible company, and let us live up to our responsibility towards people, the environment, and society. Let us do the right thing. Every single day.

Yours sincerely



Martin Daum



Karl Deppen



Dr. Andreas Gorbach



Jürgen Hartwig



John O'Leary



Karin Rådström



Stephan Unger

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**Only those who act responsibly  
will be successful in the long term.**



# 1

## Our understanding: Principles for all who keep the world moving



# Our understanding: Principles for all who keep the world moving

1

With our trucks and buses, we have laid the foundation stones for the modern transport industry. Today, we are one of the largest commercial vehicle manufacturers in the world. We act on the basis of trust – among ourselves and with our customers, business partners, investors, and society as a whole. We are committed to leading our industry towards sustainable transport:

- » We are shaping the future of freight and passenger transport and its operation sustainably.
- » As **employees\***, we take responsibility for people, the environment and society.

**Sustainability** is an integral part of our corporate behavior. The framework we have set for our responsible actions is known as **ESG**. Accordingly, we concentrate on the three topics of “**E**nvironment”, “**S**ocial” and “**C**orporate Governance”

We also need to navigate through challenging situations brought about by changes to our industry. We comply with laws, internal and external rules, agreements with employee representatives, trade unions, and voluntary commitments.

The policy defines the behavior that we expect from everyone in the Daimler Truck Group. As such, the provisions contained in this Daimler Truck Code of Conduct are binding for all of us.

## **Diversity, equal opportunities and inclusion are important to us.**

For this reason, the language we use in this policy is largely gender-neutral. In the interest of easier readability and orientation to legal requirements (for example, fixed terms), we use the generic masculine at some points in the text. In these cases, the terms chosen include all gender identities without limitation.

\* Explanation of highlighted terms in the glossary starting on p. 39



# We start with listening.



Before we start, let's get an overview. We start with examining questions and not just general answers. We foster a culture of collaboration where open exchange and feedback is appreciated and rewarded. We are humbled by the fact that we know our work goes much further than we alone can see. In this way, we learn what strengths we already have, how we can further improve ourselves and our high-quality products and services, and what is particularly relevant for our customers on the road.







1

# We build to solve.

Our customers, society and economies are constantly on the move, which is why we are continuously following them and adapting every solution to the current situation. In order to shape the future, we promote an environment in which we openly address errors and overcome them together. Challenges make each of us want to tackle them successfully. We are empowered and encouraged to make decisions by carefully weighing up opportunities and risks. If we do not feel safe in a situation, we seek expert advice. In particular, we are attentive to any **conflicts of interest** that may arise, we never tolerate **corruption** or fraud, and we enable fair competition.

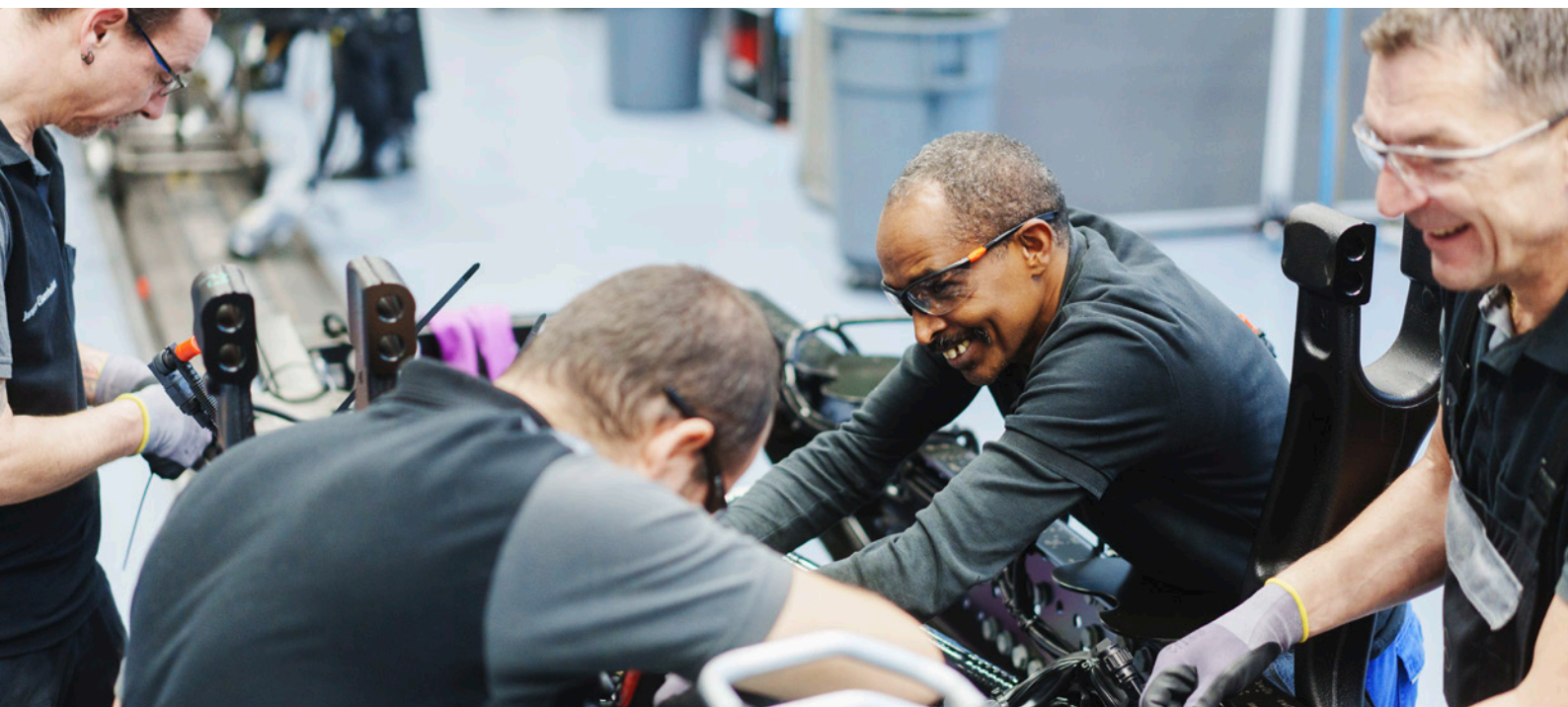


# We lead with the long view.

Since we have been at our customers' sides for many generations now, we can draw on a wealth of experience. We think decades ahead and work for future generations. We use our past learnings to enhance our future opportunity to fulfill our responsibility to the people, environment and society in the best possible way. We are not striving for short-term success, but for the right and sustainable solution. This is reflected in our daily behavior and decision-making. We develop innovations that enable safe, efficient, and reliable transport. Ultimately, our customers base their existence on our products and services. That's why we see ourselves as a partner for their economic success – we advise and support them throughout the entire shared journey.







# We progress together.

A connected world thrives. If we combine our individual strengths and intelligence, we will achieve much more than we would alone. That's why we actively lend each other a helping hand. We are convinced that the combination of the different characteristics of our employees – for example, with regard to gender, age, (cognitive) **diversity**, cultural background, and education level – will produce better results. We develop new technologies together. Our mutual progress also moves our customers forward. For us, teamwork based on respect is a core part of our daily work. We learn from each other, whether it be across professions, departments, or countries. We also take care of each other, because people are what make our company. We are committed to respecting human rights and the rights of each individual. We have many brands within the Daimler Truck Group – and behind them all is a strong family that shares the same motivation: creating progress for our customers' benefit.



This motivation is based on a common goal:

**We do what  
we do for all  
who keep the  
world moving.**







## 2

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# How we work: Our behavior guidelines





## How we work: Our behavior guidelines

# 2

As one of the world's largest commercial vehicle manufacturers, our goal is to develop sustainable, high-quality, and future-proof transport solutions for moving goods and passengers, and to bring them onto the road. We take our responsibility for our employees, the environment and society very seriously. We view **sustainability** holistically as an integral part of our business and our corporate culture.

### 2.1 Principles for working together

#### 2.1.1 Diversity, equal opportunities and inclusion

We anchor the conscious handling of diversity and individuality in our corporate strategy.

At Daimler Truck, we appreciate the uniqueness of our employees, we know how to appreciate our individuality. This is why **diversity**, equal opportunities and **inclusion** are part of our corporate strategy, which addresses **diversity** and individuality in a conscientious way. Since we are a global company, this is crucial to our economic success.

In accordance with our corporate principles, we treat each other with mutual respect and fairness. **Equal opportunity** for all is our goal, and **discrimination** of any kind is not tolerated. In particular, we do not discriminate when it comes to:

We all aim for equal opportunity.

- » gender and gender identity
- » ethnic origin and nationality
- » age
- » religion or ideology
- » sexual orientation
- » physical and/or mental capabilities
- » social background
- » political, social or union affiliation.

We create a culture of appreciation – discrimination, harassment, and bullying have no place in our company.

We also respect the personal rights of each individual. We establish a culture of 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 or **bullying** goes against who we are and has no place at Daimler Truck. It is our shared duty to create a fair, respectful and friendly working environment.

### **2.1.2 Work-life balance and private life planning**

We strive to foster a balance between professional and personal life.

A diverse working culture that includes everyone and which is characterized by respect and appreciation forms the basis for good cooperation. This environment is the only way for all **employees** to reach their full potential. The Daimler Truck Group creates general conditions that help **employees** to give their best and remain productive regardless of their individual domestic circumstances. In doing so, we enable all our **employees** to maximize their contribution to our mutual success. For this purpose, we offer a wide range of opportunities and programs to promote a **work-life balance** on a country-specific basis and on the basis of company agreements.

### **2.1.3 Health and safety**

We ensure that working conditions are safe. The safety, health, and wellbeing of our employees take top priority in the Daimler Truck Group. We create a working environment in which everyone can perform to the best of their ability while maintaining their physical and mental health.

We strive to prevent work-related accidents and illnesses.

High technical and operational safety standards are the basis for our work. We all strive to prevent accidents at work and occupational illnesses. We express our mission for zero accidents and work-related illnesses by voluntarily participating in the Vision Zero program of the International Social Security Association (ISSA), from which we derive our own measures for safety, health and well-being.

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

In the Daimler Truck Group, we comply with industrial safety regulations and use the required safety equipment. We take individual responsibility for ensuring safe working conditions and report any potential health and safety risks. We do not work under the influence of substances that are likely to significantly impair our ability to work (e.g. alcohol and drugs), so we do not endanger our own safety or the safety and well-being of others.



We provide health prevention programs for our employees.

The Daimler Truck Group offers country-specific programs designed to promote health and aimed at prevention, and counts on the active participation of its **employees**. The programs cover areas such as the following:

- » occupational medicine and occupational protection
- » occupational safety
- » health management (e. g. occupational health promotion, ergonomics)
- » reintegration
- » counseling service.

#### **2.1.4 Working with employee representatives**

We work constructively with employee representatives.

We stand by 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 our **employees**. Even in cases of challenging discussions, the shared goal will be to lay and preserve a firm foundation for constructive collaboration.

#### **2.1.5 Social media**

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

Social networks such as Facebook, LinkedIn, Instagram, Twitter or TikTok play an increasingly important role in public discourse. We, too, use social networks and our own **social media** channels to communicate with our **employees**, business partners, customers and the public. We do not tolerate hate-filled, derogatory, or discriminatory posts on **social media**.

Examples of other unacceptable posts include those which:

- » convey subversive content
- » offend the dignity of other users
- » discredit our reputation and the reputations of our **employees**, or
- » harm our relations with key stakeholders.

### **2.1.6 Representing Daimler Truck in public**

It is everyone's business to handle corporate information responsibly. As such, the Daimler Truck Group follows a policy intended to ensure coordinated and uniform representation of the company (**One Voice Policy**).

We coordinate external publications with the communications department.

Consequently, external publications and statements in all forms of media (online, print, TV, radio and **social media**) as well as during speeches, lectures, interviews and panel discussions are to be coordinated with Corporate Communications.

We ensure that our personal views are designated as such when appearing in public.

Daimler Truck **employees** have the right to freedom of expression. When stating our individual opinions in public, at events, in public online forums or on **social media** networks where we can be recognized as Daimler Truck **employees**, we ensure that we identify such posts as our own personal views.

### **2.1.7 Choosing business partners**

We expect our business partners to act with integrity.

The Daimler Truck Group expects not only its **employees** to comply with the Daimler Truck Code of Conduct and the law, but also its business partners, such as suppliers and sales partners, and their business partners along the entire value chain.

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

Depending on the risk, we conduct an **integrity check** before entering into any contracts. The **employees** responsible for choosing business partners are obligated to screen them to the extent allowed by law using a transparent selection process. This ensures that potential business partners comply with our Daimler Truck Code of Conduct.



## 2

We also expect our business partners to comply with our requirements after the contract has been concluded. They undertake to base their actions on these values and continuously reflect upon them.

We encourage our business partners to make sure that their business partners respect our Daimler Truck Code of Conduct as well.

In addition to the content of the Daimler Truck Code of Conduct, our business partners are obliged to inform their employees of the applicable laws and our Business Partner Standards as well as the related requirements. Our business partners are also expected to share these regulations with their business partners and ensure compliance with them.

Concerns regarding integrity or possible violations of laws and/or this Daimler Truck Code of Conduct will be reviewed together with the business partner. If they cannot be resolved, we reserve the right to take legal action that may include terminating the business relationship.



## 2.2 Compliance with laws

### 2.2.1 Product safety and compliance with technical regulations

We are designing the mobility of the future to be as safe as possible.

The quality of our products and services has a high priority for us at Daimler Truck. Throughout our company's history, we have repeatedly set new standards for vehicle safety. Even today, we are doing our utmost at every level within our company to make the mobility of the future as safe as possible.

We use technological advancements to reduce pollutant emissions and greenhouse gases.

Through the technological advancement of our products and services, we are pursuing the goal of reducing emissions in order to continuously improve air quality. Moreover, we are making efforts to continually lower the output of greenhouse gases to make our contribution to protecting the climate.

We ensure the regulatory conformity of our processes and products.

Throughout the **product life cycle**, we ensure the legal and **regulatory conformity** of our processes and products. When doing so, we take into account the fundamental spirit and purpose of the relevant laws and regulations. The necessary laws and regulations are communicated and made available to our **employees**. If the framework conditions are unclear, our **employees** can navigate the **Product Compliance Management System**.

As experts, we increase the confidence in our products.

As **employees**, we play a key role: From the initial idea to the reconditioning or 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 potential 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 the life cycle of our products and services, we think about the possible impact of our actions. We openly address potential risks in our areas of responsibility (**speak-up culture**).



### **2.2.2 Tax and customs regulations**

We comply with applicable tax and customs regulations.

In the Daimler Truck Group, 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 the Daimler Truck Group. We reject aggressive and/or illegal tax avoidance models.

### **2.2.3 Antitrust law**

Fair, well-functioning and unhampered competition is one of the fundamental pillars of our social and economic system. This creates growth and employment and ensures that, as consumers, we can all buy modern products and services at affordable prices.

We are committed to protecting fair competition.

The Daimler Truck Group also benefits from well-functioning competition as 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:

- » exchange of information and comparative analyses with competitors;
- » when making investments and undertaking cooperation agreements;
- » in connection with vehicle sales and after-sales;
- » for sales incentives; and
- » when engaging in trade association activities.

We know the regulations relevant to our own area.

Competitor contacts are properly documented and training is carried out on a regular basis. When attending association meetings, the corresponding special requirements are observed due to the increased risk of antitrust violations.

#### **2.2.4 Foreign trade legislation**

We comply with all regulations under foreign trade law.

Compliance with foreign trade regulations is fundamental for a globally engaged company such as the Daimler Truck Group. Foreign trade provisions must be observed when exporting both tangible and intangible goods as well as services. Restrictions generally exist for military goods and civil products that can also be used for military purposes.

We act with strict compliance regarding embargoes.

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

#### **2.2.5 Economic sanctions and money laundering prevention**

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

As a globally acting company, we comply with national and applicable international economic **sanctions** and support the community of states to fight against **money laundering** and terrorism financing. The Daimler Truck Group complies with all relevant requirements.

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

**Employees** observe the above requirements applicable to their area of responsibility. This includes, in particular, the current **sanction** lists. Our business processes must be designed in such a way that all forms of white-collar crime are prevented.

#### **2.2.6 Intellectual property protection**

We ensure the protection of our intellectual property as one of our most important resources.

The Daimler Truck Group owns extensive know-how as well as numerous **patents** and other property rights, such as **trademarks** and **designs**. They are among the company's most important assets and enable us to stay competitive and react to the market. We, therefore, ensure that they are protected against misuse. It is equally important to ensure that we avoid the unauthorized use of third-party intellectual property.

### **2.2.7 Insider trading legislation and ad-hoc announcements**

We are committed to fair trading of securities and prevent insider trading.

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 publish information that could significantly impact the share price in an ad-hoc report promptly.

As a stock-listed company, the Daimler Truck Group is under a legal obligation to publish Daimler Truck related inside information without delay in the form of an **ad-hoc announcement**. As long as the announcement has not yet been published, the respective information may not be shared without authorization or used for securities transactions.

Examples of possible inside information include surprising:

- » financial results;
- » changes in earnings projections or order situation;
- » changes to dividends;
- » planned mergers, important partnerships or takeovers;
- » significant technical innovations;
- » important staffing decision and changes in management organization;  
and
- » 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 the legally prescribed manner. Until then, 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.



### **2.2.8 Corruption prevention**

We do not give or take bribes.

In the Daimler Truck Group, 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 our business, to the competition, and to the common good.

The Daimler Truck Group does not tolerate any corrupt conduct 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 the Daimler Truck Group, we avoid even the mere appearance of **undue influence**.

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

We also act in accordance with our Daimler Truck Code of Conduct when in contact with public officials. 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 when such gifts are expected or supposedly customary for official business.

The Daimler Truck Group prohibits facilitation payments. These payments, which are of low value, are generally made to public officials in order to facilitate or expedite a routine official act to which the Daimler Truck Group is legally entitled. We do not make facilitation payments, either directly or indirectly.

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

We are familiar with the regulations relevant to our own area.

Each of us plays an important role in complying with laws and internal regulations. The prerequisite for this is that all **employees** know which regulations are relevant for their own area.







## 2.3 Social responsibility and environmental protection

As one of the world's largest commercial vehicle manufacturers, we want to put sustainable and future-proof transport solutions for the movement of goods and passengers on the road. We take our responsibility for our **employees**, the environment and society as a whole very seriously.

### 2.3.1 Respect for human rights

We respect human rights and the core labor standards of the International Labor Organization (ILO).

The Daimler Truck Group respects the internationally recognized human rights and bases its actions on the **United Nations Guiding Principles on Business and Human Rights**. We therefore place special importance to the rights of the UN International Bill of Human Rights and the **core labor standards of the International Labor Organization (ILO)**.

We reject all forms of child labor, forced labor, and modern slavery.

The Daimler Truck Group rejects child labor, forced labor, modern slavery, all forms of **discrimination**, threats to persons who defend human rights (e.g. employee or union representatives), and other human rights violations. We also oppose all exploitative working conditions.

We ensure health and safety at work on the basis of the legal requirements for occupational health and safety. We are committed to the education and qualification of all **employees**.

We also pay close attention that our business partners respect human rights.

We work towards ensuring that our business partners, especially suppliers and their subcontractors, also observe these standards and principles. We take appropriate action and responsibility for due diligence concerning human rights in accordance with the United Nations Guiding Principles. Our commitment is also reflected in our statement on social responsibility and human rights.

### **2.3.2 Representation of political interests**

We engage in reliable dialogue with governments and organizations.

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.

### **2.3.3 Donations and sponsorships**

We consider corporate success to be inseparable from social responsibility.

For us, business success and social responsibility go hand in hand. We contribute to the advancement of society and create recognizable benefits. Our approach is based on the motto of "With our **employees** – for our locations – around the world".

At Daimler Truck, we strengthen social development and promote equal opportunities.

At our sites, the Daimler Truck Group supports a wide variety of initiatives aimed at furthering the advancement of society and promoting **equal opportunities** at a local level. In this way, we strengthen the community and promote social issues, road safety and environmental protection in particular. We welcome and encourage the voluntary commitment of our **employees**.

We do not expect anything in return for donations.

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 brands and products as well as our company.

We obtain approval for donations and sponsorship activities with political organizations.

We follow the laws and internal regulations governing donations, sponsorships and charity activities. Donations and other contributions, sponsorships and monetary benefits that the Daimler Truck Group gives to political organizations (e.g. political parties and governmental institutions) require special approval. Political party donations are subject to a decision by the Daimler Truck Board of Management. Political contributions must also undergo a special approval process.



### **2.3.4 Volunteering**

We support volunteering by our employees.

**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 democratic institutions, social activities or charitable giving.

### **2.3.5 Environment**

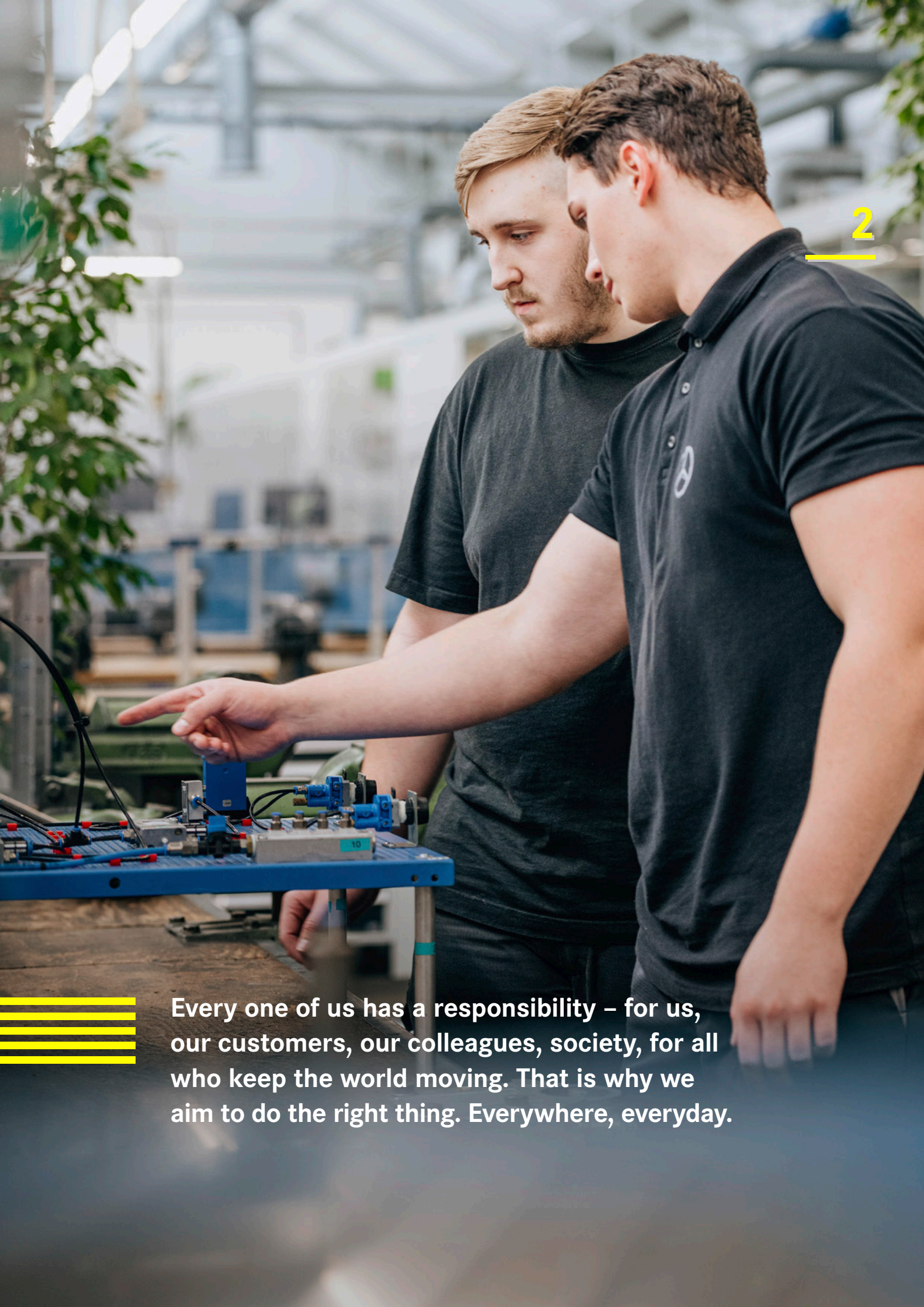
We endeavor to achieve exemplary ecological and energy performance worldwide.

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 friendly and energy efficient along the entire value chain.

Our ambition is to develop products that are particularly environmentally friendly and energy efficient in their respective market segments. Our approach to environmentally friendly and energy-efficient **design** covers the entire product spectrum of the Daimler Truck Group, taking into account the entire **product life cycle** from **design** to purchasing, production, disposal and recycling.

We design every stage of the value chain to be as eco-friendly and energy efficient as possible in order to minimize our environmental impact and energy consumption. We provide **employees**, customers and the general public with the information they need to understand the ecological impact and energy efficiency of the Daimler Truck Group's products and corporate activities.

A photograph of two men in a factory or industrial setting. They are both wearing dark grey polo shirts. The man on the right is pointing towards a piece of machinery on a blue table. The machinery has various blue and silver components. The background is a blurred industrial environment with overhead lights and structural elements. There are yellow decorative elements: a horizontal line under the page number '2' and three horizontal lines to the left of the text block.

Every one of us has a responsibility – for us, our customers, our colleagues, society, for all who keep the world moving. That is why we aim to do the right thing. Everywhere, everyday.



## 2.4 Dealing with conflicts of interest

### 2.4.1 Conflicts of interest

We carefully weigh our personal interests against those of the company and disclose conflicts of interest.

The Daimler Truck Group respects the individual interests and personal 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** arise, we must disclose them and seek a solution with the respective manager that does not harm the interests of the Daimler Truck Group.

**Conflicts of interest** can arise, for instance, if **employees**:

- » accept, offer or grant gifts or invitations;
- » are members of the governing bodies of other companies;
- » pursue sideline activities; or
- » invest in competitors.

### 2.4.2 Sideline activities and official responsibilities

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

Paid sideline activities by our **employees** must be disclosed to the responsible manager before employment starts. The manager will examine whether there could be a **conflict of interest**. In the event of a **conflict of interest**, the sideline activity can be prohibited to protect the company's legitimate interests.

We obtain approval for taking up official responsibilities in other companies.

Participating the management board, **supervisory board**, advisory board or other governing body of any other company could lead to **conflicts of interest**. For that reason, employees are not permitted to take on such duties until they have been approved.

### 2.4.3 Investments in other companies

We disclose shares in business partners and competing companies.

As **employees**, we can only acquire and hold shares and interests in business partners or competitors 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 investments other than small-scale ones 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.

#### **2.4.4 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 the Daimler Truck Group from suffering **damage to reputation** or financial loss, we base our decisions on objective and verifiable reasons and are not influenced by inappropriate benefits-in-kind.

We reject inappropriate benefits-in-kind from business partners.

As **employees**, we may 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.

We only accept invitations if they serve a business purpose and are appropriate for the occasion.

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

We are guided by defined values in case of gratuities of third parties.

We have set a reference value of 50 euros for gifts from third parties as an amount that can be seen as appropriate, and 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 any acceptance of benefits-in-kind 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.

We consider the appropriateness of benefits-in-kind to business partners and customers.

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. Benefits-in-kind are permitted only when they have an appropriate value and are given in the course of ordinary business activities. We are cautious and especially critical when determining whether it is appropriate to give gifts and invitations to employees of government agencies or government-owned enterprises, public officials and politicians.

## 2.5 Handling with company information and resources

### 2.5.1 Use of company resources

We use resources carefully and sustainably.

We use 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 for official purposes only.

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 **damage to reputation**. We, therefore, make sure that we ourselves and those around us use 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. The protection and validation of information is therefore of great relevance for the Daimler Truck Group. Regardless of whether we are meeting with business partners or attending private events, we make sure that we do not disclose information about the Daimler Truck Group that gives outsiders unauthorized insight into our business processes. We take responsibility for the information we handle by applying general conditions for information security.

We take special measures to protect trade 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.



### **2.5.2 Handling data**

With our commitment to data responsibility, we have defined a clear framework for action for the Daimler Truck Group on how we handle data based on the three guiding principles of “added value”, “business potential” and “responsible use of data”.

We add value for our customers and business partners with data. By analyzing data, we continuously improve our products and can offer innovative digital services for the benefit of our customers and business partners. We inform our customers and their employees as well as our business partners transparently about the use of data.

We consider data as a valuable asset to generate a sustainable increase in value for our company. Data and its systematic analysis is the basis for new business models, innovative technologies and efficient internal processes. To this end, we ensure high quality, transparency and availability of the collected data within our company.

We handle data of our employees, customers and business partners responsibly.

We use data responsibly and thus create sustainable trust among our **employees**, customers and business partners. With our worldwide Data Compliance Management System, we ensure adherence to all data protection requirements. By continuously improving our high data privacy and data security standards we create the basis for secure and responsible use of data.

Those who entrust us with data can rely 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.

As digitalization progresses, **artificial intelligence** (AI) will have an even greater impact on our products, services, and processes in the future. In doing so, we shall rely on the responsible use of **artificial intelligence**, explainability, protection of privacy, security and reliability, as well as ethical aspects, equal opportunities and the protection of employee rights.

# 3

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## Compliance with the Daimler Truck Code of Conduct



# Compliance with the Daimler Truck Code of Conduct

## 3

### 3.1 Scope

We as employees of Daimler Truck are familiar with the principles of this policy and adhere to it.

This Daimler Truck Code of Conduct applies to all **employees** of Daimler Truck Holding AG and Daimler Truck AG as well as the Daimler Truck Group companies they control. All **employees** are required to familiarize themselves with this Daimler Truck Code of Conduct, know it, and comply with it. Once specific policies or other regulations have been enacted, they become binding.

We expect our business partners to comply with our Daimler Truck Code of Conduct.

We also expect our business partners to know and comply with this policy. Anyone who does not share the principles described in this Daimler Truck Code of Conduct cannot do business with us.

### 3.2 What we expect of our managers

We expect our managers to live up to their role model function and promote respectful and trusting interaction.

Responsible conduct requires responsible managers. The Daimler Truck Group therefore expects managers at every level to fulfill their duty to set an example by behaving ethically, thereby giving **employees** guidance. Supported by good working conditions, our managers are committed to achieving excellent work results. At all times, they observe our **corporate principles and behavior guidelines** and the provisions of this Daimler Truck Code of Conduct. As they do so, they serve as inspirational examples to their team members.

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



### 3.3 Managing mistakes

We learn from mistakes and address them openly.

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

We welcome a culture of error admission that fosters openness, fairness and trust.

The prerequisite for this is a corporate culture that recognizes, discusses, and corrects wrong decisions. It is therefore up to each and every one of us to take responsibility and to create and demand a work environment in which **employees** are not afraid to address any possible mistakes. As a company, we welcome an open, fair and responsible mistake management culture.

### 3.4 Treatment of rule violations

We do not hesitate to address observed violations of regulations.

Violations of laws, policies and other regulations can cause major financial losses, involve the risk of fines being imposed on the Daimler Truck Group and its **employees**, do **damage to our image and reputation**, result in permits not being granted, and cause us to be excluded from local and national markets. Violations must therefore be detected in a timely manner in order to prevent the Daimler Truck Group and its **employees** from suffering harm and to ensure fair cooperation. If we as **employees** observe rules or regulations being violated or have reason to suspect that a violation of a rule or regulation may have occurred, we do not hesitate to address it. In the event of (potential) violations, it is therefore important that **employees** contact their manager, the responsible HR department, the employee representatives, social counseling, colleagues in the Legal and Compliance department, or the **Whistleblowing System SpeakUp**. The **Whistleblowing System SpeakUp** is open to all employees, business partners, and third parties.

We know and use our Whistleblowing System SpeakUp, which is open to all employees, business partners and third parties and defines confidentiality and fairness as the most important principles.

The team around the **Whistleblowing System SpeakUp** accompanies the processing of tip-offs until the case has been closed. While doing so, the **Whistleblowing System SpeakUp** strives to maintain the highest possible level of confidentiality. We also make fairness a priority in our Whistleblowing System, both when interacting with whistleblowers and **employees** affected by an allegation. We always follow the principle of proportionality. In each and every case we consider which consequences are appropriate, necessary and reasonable.

If you have substantial indications of violations, please contact the **Whistleblowing System SpeakUp** directly. The **Whistleblowing System SpeakUp** is available via the online SpeakUp platform or by email at [speakup@daimlertruck.com](mailto:speakup@daimlertruck.com).

### 3.5 Support and assistance

Employees can find further information on this policy on the Daimler Truck website and on our Social intranet.

This Daimler Truck Code of Conduct cannot provide specific answers to every question and situation. If you are unsure and need guidance in your daily activities at work, you as an **employee** can find more detailed information and contacts on the Daimler Truck website, as well as in the Social Intranet.



# 4

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## Glossary



- Ad-hoc announcement** Public announcement by a stock exchange listed company. It contains insider information, i. e. Information pertaining to the disclosing company that could affect the stock market price of securities related to that company.
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- 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. Machine learning (ML) is a subset of AI methods and is based on mathematical methods that find complex patterns in datasets. Deep learning is another sub-area of ML. It makes it possible to find complex patterns in very large amounts of data using (deep) neural networks.”
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- Bullying** Prolonged, successive and overarching animosity, victimization or discrimination hurting the affected person.
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- Conflicts of interest** A conflict of interest may arise whenever personal or individual financial interests collide with those of the Daimler Truck Group or its business partners. If the conflict of interest cannot be resolved, an individual may need to be removed from a certain office or function. Examples of scenarios which might involve a conflict of interests include: Gifts, invitations, sideline activities, or involvement with competitors.
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- 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.
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- Corruption** Abuse of an office or position in order to obtain an advantage. One common instrument of corruption is bribery.
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- Damage to reputation** 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.
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- Design** Design registration provides protection for the appearance of a product. Any industrial or handicraft item can be protected.
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- Diversity** Individual differences within a group of people like gender, age, origin, sexual orientation and other characteristics.
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- Embargo** Government order prohibiting trade with a specific country.
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- Employees** All employees of Daimler Truck Holding AG and Daimler Truck AG as well as the controlled Daimler Truck Group companies. The term “employee” also includes managers at all levels as well as members of managing bodies.
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- Ecological and energy balance** Ratio of energy consumption to energy use, especially in terms of impact on the environment.
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- Equal opportunity** Employ, promote and develop all employees regardless of gender, age, origin, religion or other individual characteristics according to their skills, abilities and performance.
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- ESG** The abbreviation ESG stands for Environment, Social and Governance. In the context of sustainable finance, the abbreviation is used when investment decisions involve the consideration of environmental, social and governance aspects, in short ESG criteria. The “E” for Environment refers, for example, to issues such as environmental pollution or hazards, greenhouse gas emissions or energy efficiency (Environment). Social (“S”) includes aspects such as working conditions, occupational health and safety, diversity or social commitment (corporate social responsibility). Governance (“G”) refers to sustainable corporate management. This includes, for example, topics such as corporate values or management and control processes (corporate governance).
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- Inclusion** The conscious, integrative and appreciative handling of diversity with the aim of including and treating all employees equally.
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- 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.
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- Integrity check** Measures to verify that potential business partners comply with the Daimler Truck Group’s value standards and, for example, do not engage in inappropriate or illegal practices.
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<b>International Social Security Association (ISSA)</b>	This is a non-profit organization that aims to promote and expand social security, in particular occupational health and safety, worldwide.
<b>Money laundering</b>	Channeling of illegally generated funds into the legal economic cycle.
<b>One Voice Policy</b>	Uniform principles in external communication. The aim of the One-Voice Policy is to ensure consistent and stringent communication throughout the Group, based on uniform disclosure 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.
<b>Patent</b>	This is an intellectual property right for innovative products, technologies and procedures. A patent guarantees its owner the exclusive right to decide whether and how third parties may use the protected invention. The protection period of German patents is 20 years.
<b>Personal data</b>	All information directly or indirectly related to an individual including, for example, name, address and age.
<b>Product Compliance Management System</b>	Product compliance ensures legal and regulatory conformity during the product life cycle. In order to achieve this, the Daimler Truck Group has developed the Product Compliance Management System (PCMS). The PCMS defines principles, structures and processes that provide employees with security and orientation, especially in the case of demanding issues relating to the interpretation of technical regulations. Employees can find further information in Policy C.157.
<b>Product life cycle</b>	All phases a product passes through, from design, production and use, to disposal and recycling.
<b>Regulatory conformity</b>	Regulatory conformity in the context of product safety and conformity to technical regulations refers to compliance with national and international legal requirements, technical norms and standards, the state of the art in science and technology, and Daimler Truck Group guidelines, in as far as they stipulate technical standards.

**Sanction** Sanctions are measures imposed by both individual states (e.g. the USA) and supranational organizations recognized under international law (UN or EU) as economic policy measures against individuals and/or states. Sanctions usually consist of trade restrictions against states (so-called embargoes) and/or business prohibitions against individuals (so-called sanctions lists).

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**Social media** Social Media refers to 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. Some of the most popular social media platforms are Facebook, Twitter, Instagram, blogs, Wikipedia, TikTok, and YouTube.

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**Speak-up culture** Corporate culture where uncertainties and potential risks can be reported to the appropriate contact. This is to encourage each individual to freely voice their opinion and criticism.

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**Supervisory Board** Highest control committee at the Daimler Truck Group, 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.

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**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.

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**Undue influence** Exertion of influence on a person by means of rewards, such as donations or non-cash gifts.

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**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.

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**Vision Zero** Prevention strategy of the International Association for Social Security (ISSV), which focuses on three dimensions: safety, health and well-being.

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

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**Wastefulness** Careless, excessive use of (corporate) resources.

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**Whistleblowing System SpeakUp** Whistleblowing System of the Daimler Truck Group, which is open to all employees, business partners, and third parties in order to address high-risk risks and rule violations. High risks include offenses such as corruption, antitrust law violations and money laundering.

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**Work-life balance** Work-life balance is based on an appropriate balance between work and private life, as well as other areas of life. The areas depend on the individual needs of each individual. In particular, the focus is on a fulfilling job and a happy family and private life, as well as physical and psychological health, but also many other individual factors.

The version currently available in the Enterprise Regulations Database (ERD) on the Social Intranet applies.

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