

# DAIMLER TRUCK



## **Daimler Truck Code of Conduct** DTC 1.0

# Policy Profile

**Indispensable Policy:** ☒ yes ☐ no

<b>Purpose</b>  Our Daimler Truck Code of Conduct governs the main principles of conduct in the Daimler Truck Group. It covers our purpose principles and behavior guidelines, i.e. in the following areas: Respect for human rights, complying with laws and internal regulations, appropriate conduct within the Daimler Truck Group and in dealings with authorities, government officials, business partners and customers, dealing with conflicts of interest, prevention of all forms of corruption, protection of company assets, exercising our social responsibility, handling data.	
<b>Scope of Application (short description)</b>  All Daimler Truck group companies	<input type="checkbox"/> only in GERMANY <input type="checkbox"/> only out of GERMANY <input checked="" type="checkbox"/> Global  Selected Countries: _____
<b>Entities</b>  All Daimler Truck group companies	<b>Company Functions &amp; Levels</b>  All employees of all levels, incl. Board of Management CEOs of Daimler Truck group companies CFOs of Daimler Truck group companies
<b>Required Actions</b>  This document is a binding document for all employees. All principles and responsibilities defined in this document must be followed by all employees according to their role within the organization.	<b>Responsible Department and Policy Owner</b>  Eckhard Schief (TL/GCB)

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## Our Daimler Truck Code of Conduct

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### Definition



Our Daimler Truck Code of Conduct defines our common understanding of how we behave in the right way and is a central part of our corporate culture.

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### Aim

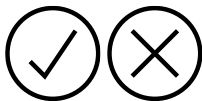


Our Daimler Truck Code of Conduct defines our common understanding of how we behave in the right way and is a central part of our corporate culture. It provides us with guidance for our behavior; it sets out clearly which rules apply to everyone and which principles we follow. In short, it helps us to make the right decisions.

Our four “Purpose Principles” are the heart of our Daimler Truck Code of Conduct. They sum up how we approach our work and are the basis for the actions of our employees:

- We start with listening.
  - We build to solve.
  - We lead with the long view.
  - We progress together.
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### Dos & Don'ts



The Daimler Truck Code of Conduct sets rules for correct behavior:

- We manage our work sustainably.
- We stand for our responsibility towards people, the environment and society.
- We act ethically and in a legally responsible manner.
- We respect and follow the rules.
- We address issues openly and create transparency.
- We consider fairness and respect as the foundation for our cooperation.
- We practice diversity and learn from each other.

All employees of Daimler Truck Holding AG, Daimler Truck AG, and the controlled Daimler Truck group companies must familiarize themselves with the content of this Daimler Truck Code of Conduct, know it, and act accordingly. If specific guidelines or other regulations exist, they are binding.

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### Further information



Further information can be found here: [Daimler Truck Code of Conduct](#)  
Contact: [code\\_of\\_conduct@daimlertruck.com](mailto:code_of_conduct@daimlertruck.com)

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

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 "Environment", "Social" and "Corporate 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.

### **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.

### **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. 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 team 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. How we work: Our behavior guidelines**

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**

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:

- 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 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.

Daimler Truck provides information and support services on various topics to further assist and raise awareness among employees.

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

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.

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.

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.

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 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

Social networks such as Facebook, LinkedIn, Instagram, X 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](#)).

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.

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

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.

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.

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

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 Daimler Truck 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

The quality of our products and services is of 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.



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. Throughout the [product life cycle](#), we ensure the legal and [regulatory conformity](#) of our processes and products. When doing so, we take the fundamental spirit and purpose of the relevant laws and regulations into account. 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 [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 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 promote a speak-up culture, where we openly address potential risks in our areas of responsibility.

### **2.2.2 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.

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.

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 after-sales and vehicle sales;
- for sales incentives; and
- when engaging in trade association activities.

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**

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.

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

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.

[Employees](#) observe the above requirements applicable to their area of responsibility. This includes the current [sanction](#) lists. Our business processes must be designed to effectively prevent all forms of white-collar crime.

### 2.2.6 Intellectual property protection

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

The misuse of inside information is prohibited. Our company is committed to maintaining fair securities trading practices. We take all necessary and appropriate measures to prevent [insider trading](#) within our organization.

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.

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

In the Daimler Truck Group, we have a clear understanding of what kind of business we will or will not do. We neither give nor accept bribes. We earn the trust of 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.

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](#).

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.

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

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 \(ILO\)](#).

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 in the workplace by fully complying with all legal occupational health and safety requirements to ensure a secure and productive environment for all [employees](#). We are committed to the education and qualification of all [employees](#).

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 Corporate Citizenship at Daimler Truck: Daimler Truck Cares

For us, business success and social responsibility go hand in hand. We contribute to the advancement of societies worldwide and create recognizable benefits. Our social commitment supports our business strategy and is bundled under the umbrella of **Daimler Truck Cares**.

With our strategic **Corporate Citizenship** approach, we place particular emphasis on two areas: **Corporate Giving** (monetary and in-kind donations) and **Corporate Volunteering** (voluntary commitment of our employees).

We only donate 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. We comply with all legal requirements and have established an internal donation process. Donations that are political in nature require a separate approval process.

In addition, we welcome and promote the volunteering efforts of our **employees** (**Corporate Volunteering**). We encourage them to participate in local community efforts, and make our collective skills, expertise, and our hands-on support available to charitable organizations.

**Corporate Volunteering** complements the voluntary work that many of our **employees** do alongside their work at Daimler Truck. As a company that takes its responsibility to the community seriously. We support our employees' volunteer activities regardless of whether those activities are social, charitable or political.

Our **Corporate Citizenship** activities include various projects worldwide that are tailored to local needs. We also want to strengthen our global activities in the areas of health & traffic safety, education, environment, and international disaster relief.

### 2.3.3 Sponsorships and marketing partnerships

We use sponsorships (including product placements) and marketing partnerships in a transparent and targeted manner to positively influence the public perception of our brands, products and services as well as our company. In every project, our contributions and those of the business partner correspond to each other in terms of value. Before concluding the contract, we subject each partner to a risk-based integrity check and pay attention to potential reputational risks of a collaboration. We comply with applicable laws and internal regulations throughout the execution of projects. Cases with direct or indirect political connection require a separate approval process.

### 2.3.4 Representation of political interests

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

### 2.3.5 Environment

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 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 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.

## 2.4 Dealing with conflicts of interest

### 2.4.1 Conflicts of interest

The Daimler Truck Group respects the individual interests and personal lives of its employees. Every employee must ensure that personal and private financial interests do not influence business decisions.

Therefore, we must 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 immediately and seek a solution with the respective management group 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

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.

Participation on 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

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.

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.

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 have set a reference value of 70 euros for gifts from third parties as an amount that can be seen as appropriate, and 120 euros for invitations from third parties. In case of doubt whether a gift or an invitation is appropriate, we consult with our manager.

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

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 during 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 company information and resources

#### 2.5.1 Use of company resources

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.

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 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.

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 use data responsibly and protect the privacy of our [employees](#), customers and business partners to create sustainable trust. 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.

Anyone who entrusts us with data can rest assured that it will be processed securely and in compliance with the law. All [employees](#) are responsible for using [personal data](#) only in a permissible manner and protecting it from unauthorized access. Our aim is to take data protection aspects into account in all products, services and processes at an early stage.

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. Compliance with the Daimler Truck Code of Conduct

### 3.1 Scope

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 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

Responsible conduct requires responsible managers. The Daimler Truck Group therefore expects managers at every level to fulfill their duty to set a good 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 comply with our 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 treat their staff with respect and professionalism 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

Learning from mistakes is a key part of who we are, helping us grow 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.

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

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, all **employees** have a responsibility to promptly report their concerns, whether they choose to 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.

The team around the **Whistleblowing System SpeakUp** oversees 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

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.



