

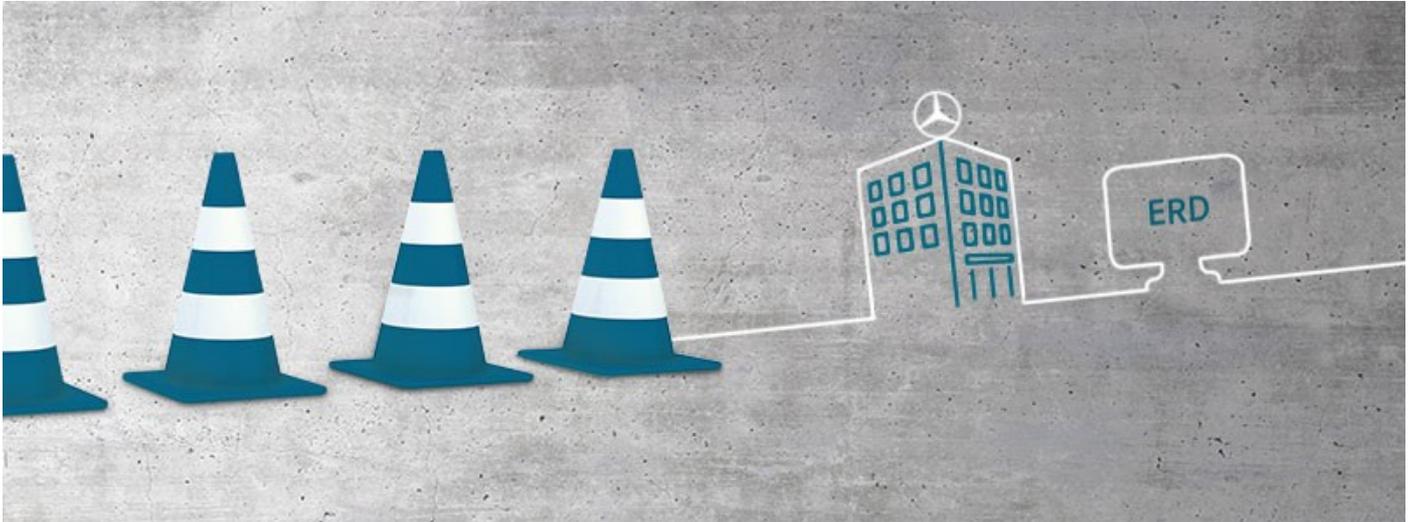
## Our Integrity Code IC 0.2

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### Purpose of Policy / Management Summary

Our Integrity Code governs the main principles of conduct in the Daimler Truck Group. It covers our corporate principles and behavior guidelines, i.a. 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

### Changes to Previous Version

02/10/2022 – Revision:

formal adjustments (Standards and Form)

annex updated

### Action Requirement

[For members of managing bodies of the Group companies](#)

Please enact this policy immediately and communicate it to the affected employees.

[For managers of Daimler Truck Holding AG / Daimler Truck AG](#)

Please familiarize yourself with the provisions of this policy and comply with them.

## Our Integrity Code IC 0.2

For employees of Daimler Truck Holding AG / Daimler Truck AG

Please familiarize yourself with the provisions of this policy and comply with them.

For members of managing bodies of Framework Light companies

This is an indispensable policy. Your company falls within the scope of application of this policy. Please enact this policy immediately.

### Scope of application

This policy applies to all employees and members of management bodies at Daimler Truck Holding AG and all controlled group companies.

### Period of Validity of this Version

10/29/2019 - 10/28/2024

### Last Revision of this Version

2/10/2022

### Topic

Integrity & Compliance (Integrity)

### Approval

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### Documentation

Published in the Enterprise Regulations Database (ERD) in the Daimler Truck Employee Portal at 2/10/2022.

### Mandatory documents

#### Policy Documents

Our Integrity Code : 17 Pages

Annex: Glossary: 4 Pages

Foreword by the Board of Management: 1 Page

#### Further Applicable Regulations

- [KBV 1117.1 KBV für integres Verhalten \("Verhaltensrichtlinie"\)](#)
- [SAR 4.0 Unsere Verhaltensrichtlinie](#)

### Helpful documents

## CONTENTS

<b>1</b>	<b>Introduction</b>	<b>2</b>
<b>2</b>	<b>What We Stand For: Our Understanding of Integrity and Our Corporate Principles</b>	<b>2</b>
	We are profitable and are committed to people and the environment	3
	We act responsibly and respect the rules	3
	We address issues openly and stand for transparency	3
	Fairness and respect are the foundation of our collaboration	4
	We practice diversity	
<b>3</b>	<b>How We Work: Our Behavior Guidelines</b>	<b>4</b>
	Principles for Working Together	4
	Compliance with Laws	7
	Dealing with Business Partners	10
	Sustainability and Social Responsibility	12
	Digitalization	14
<b>4</b>	<b>Complying with the Integrity Code</b>	<b>15</b>

## OUR INTEGRITY CODE, IC

### 1 Introduction

At Daimler Truck we want lasting success and to create value for everyone that moves the world. We want to develop advanced technologies for our customers, build amazing vehicles and offer intelligent services. However, we cannot do so unless we act ethically and with legal responsibility – especially when dealing with our employees as well as our customers and business partners. We also want to fulfill our social responsibility. This is why we aim to do the right thing by living our values.

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

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

The foundation of our work in the Daimler Truck Group is built on our four corporate values: respect, passion, discipline and integrity. We show **respect** for our coworkers, customers and business partners. Our **passion** enables us to do our best every day; it is the basis of our success. For us, **discipline** means taking on challenges and achieving our goals while taking various interests into account. Our **integrity** makes us successful over the long term and contributes to a functioning society. These values lay the foundation for the corporate values at all our Group companies.

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

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

Integrity means doing the right thing by **living our values**. This means that: We follow internal and external rules, we act in accordance with our corporate values and, in doing so, also listen to our inner compass. In this context, we orient ourselves using our **five corporate principles**, which should be shared and practiced by all of us.

The Daimler Truck Group is committed to doing the right thing.

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

We expect all of our employees to act with integrity.

Our corporate values of respect, passion, discipline and integrity are the foundation of our work.

Integrity plays a central role in the Daimler Truck Group.

## OUR INTEGRITY CODE, IC

### **We are profitable and are committed to people and the environment**

We produce fascinating vehicles and offer innovative mobility services in order to be successful and profitable. After all, we can only offer future prospects if we are economically successful. The most important asset of our company is the people who work for the Daimler Truck Group and the passion with which they do so. Accordingly, we invest in the personal development of our employees. Sustainable treatment of the environment is important to us, which is why we protect it and use our resources responsibly. Our aim is to create lasting value for customers, employees and investors, as well as for business partners and society in general.

### **We act responsibly and respect the rules**

In the Daimler Truck Group, we take responsibility for our actions and decisions and we also follow the rules. This means that we comply with laws as well as internal and external rules, agreements with employee representatives, voluntary commitments and this Integrity Code. We make decisions conscientiously. Everyone is urged to reflect this in their own behavior.

### **We address issues openly and stand for transparency**

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

### **Fairness and respect are the foundation of our collaboration**

In the Daimler Truck Group, we treat one another with fairness and respect. Team spirit, mutual trust and a respectful attitude are important to us. This applies for our employees and also for our customers, all business partners and everyone else.

### **We practice diversity**

In the Daimler Truck Group, [diversity](#) is not simply a matter of complying with legal requirements. In the Daimler Truck Group, our strength lies in the differences among our employees, which are a key factor in our success. Their varied skills, perspectives and experiences form the basis of innovation and help us to understand the needs of

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

We follow laws and rules and take responsibility.

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

Our collaboration is based on trust, fairness and respect.

The diversity of our workforce is one of our strengths.

## OUR INTEGRITY CODE, IC

our customers worldwide. Our corporate culture is characterized by respect, tolerance and team spirit.

### 3 How We Work: Our Behavior Guidelines

#### 3.1 Principles for working together

##### 3.1.1 Diversity and equal opportunity

In the Daimler Truck Group, we appreciate the differences among our employees. This is why diversity and **inclusion** are part of our corporate strategy, which addresses the conscientious **leveraging of diversity and individuality**. Since we are a global company, this is crucial to our success.

In accordance with our **corporate principles**, we treat each other openly and with an attitude of mutual respect, tolerance and fairness. **Equal opportunity** for all is our goal. **Discrimination** of any kind is not tolerated. We do not discriminate against the following:

- sex, race, origin and nationality
- religion or ideology
- political, social or union affiliation
- gender identity or sexual orientation
- physical and/or mental disability
- age.

In the Daimler Truck Group, we respect the individual rights of our employees. We establish a culture of **tolerance** 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 in the Daimler Truck Group. It is our shared duty to create a fair, tolerant, respectful and friendly working environment.

##### 3.1.2 Representing Daimler

It is everyone's business to handle corporate information responsibly. Therefore, 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 employees have the right to freedom of expression. When stating our opinions in public, at events, in public online forums or on **social media** networks where we can be recognized as Daimler Truck employees, we ensure that we identify our **personal views** as such.

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

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

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

We coordinate external publications with the communications unit.

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

## OUR INTEGRITY CODE, IC

### 3.1.3 Health and safety

One of the Daimler Truck Group's top priorities is the health, safety and well-being of its employees. We create a working environment in which everyone can perform to the best of their ability while maintaining their physical and mental **health**.

High technical and operational **safety standards** are the basis for our work. Their purpose is to prevent work-related accidents and illnesses. We trust our employees to do their part to achieve this goal.

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 alcohol and drugs if, by doing so, we 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 safety and medicine
- health promotion in the workplace
- ergonomics
- reintegration
- counseling service.

### 3.1.4 Work-life balance

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

### 3.1.5 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 disclose them and seek a solution with the respective manager which does not harm the interests of the Daimler Truck Group.

Safe working conditions are one of our top priorities.

We want to prevent work-related accidents and illnesses.

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

The Daimler Truck Group offers its employees prevention programs for their health.

The Daimler Truck Group creates conditions that support a work-life balance.

We carefully weigh personal interests against the interests of the company.

If conflicts of interest arise, we disclose them.

## OUR INTEGRITY CODE, IC

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

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

### 3.1.6 Working with employee representatives

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

### 3.1.7 Use of 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 **reputational damage**. 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. Information security and data backups are therefore extremely important to 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.

We engage in constructive collaboration with employee representatives.

We use resources carefully and sustainably.

We use company resources only for official purposes.

We protect information because it is valuable.

Special protection is given to business secrets.

## OUR INTEGRITY CODE, IC

### 3.2 Compliance with laws

#### 3.2.1 Product safety and compliance with technical regulations

The quality of our products has a high priority for us in the Daimler Truck Group. Throughout our company's history, we have repeatedly set new standards of 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, 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 in order to continue 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 into account the fundamental spirit of the relevant laws and regulations. In cases of unclear legal framework conditions, our employees find guidance in our **corporate principles** as well as established and communicated structures and procedures.

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

We know the regulations that affect our areas of responsibility and ensure that our level of knowledge is always up to date. In every phase of our products' life cycle, we think about the possible impact of our actions. We openly address **potential risks** in our areas of responsibility (**speak-up culture**).

#### 3.2.2 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**.

#### 3.2.3 Antitrust law

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

We use technological advancements to reduce emissions and greenhouse gases.

We ensure the regulatory conformity of our products.

As experts, we strengthen the confidence in our products.

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

We comply with applicable tax and customs regulations.

We reject aggressive tax avoidance schemes.

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

## OUR INTEGRITY CODE, IC

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

The Daimler Truck Group, too, benefits from functioning competition because the laws also protect us from **unlawful agreements** and excessive prices. We are committed to ensuring fair competition in our markets and to following applicable antitrust and competition laws.

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

- when exchanging information and benchmarking with competitors
- as part of investments in shareholdings and during cooperation
- in connection with customer service and sales
- regarding the permissibility of sales incentives
- when engaging in trade association activities.

Each of us plays an important role in complying with laws and internal regulations. Compliance with regulations requires that every employee knows and follows the rules that are relevant to their own business unit.

### 3.2.4 Foreign trade legislation

Strict compliance with regulations of foreign trade legislation is a basic principle for global companies like the Daimler Truck Group. Foreign trade provisions must always be observed when exporting both tangible and intangible goods as well as services. Fundamental restrictions are placed on **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.

### 3.2.5 Economic sanctions and money laundering prevention

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

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

We are committed to protecting fair competition.

Every employee knows the rules that apply to their unit.

We comply with all regulations under foreign trade laws.

We act with strict compliance regarding embargoes.

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

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

## OUR INTEGRITY CODE, IC

### 3.2.6 Intellectual property protection

The Daimler Truck Group owns 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 cannot be misused by third parties. It is equally important to ensure that we avoid the unauthorized use of third-party intellectual property by Daimler.

### 3.2.7 Insider trading legislation and ad-hoc announcements

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

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 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 in dividend
- planned mergers, partnerships or takeovers
- significant technical innovations
- important changes in management organization
- changes in important business relations.

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

### 3.2.8 Corruption prevention

In the Daimler Truck Group, we have a clear understanding of **what kind of business we will or will not do**. We 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.

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

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

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

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

We do not give or take bribes.

## OUR INTEGRITY CODE, IC

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

We also act in accordance with our **corporate principles** when in contact with government agency employees, public officials, politicians and employees of government-owned enterprises. **We avoid even the mere appearance** of undue influence – for example, through monetary payments, non-cash rewards and other benefits. We follow this rule even when such gifts are expected or supposedly customary for official business.

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

### 3.3 Dealing with business partners

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

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

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

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

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

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

Gifts and invitations are permitted within appropriate limits.

We reject inappropriate rewards from business partners.

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

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

We document the acceptance of rewards above the reference values.

## OUR INTEGRITY CODE, IC

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

### 3.3.2 Choosing business partners

The Daimler Truck Group expects its employees to comply with our Integrity Code and laws. The Daimler Truck Group also expects its **business partners**, such as **suppliers and sales intermediaries**, to do the same.

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

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

Our business partners are urged to communicate the Integrity Code and the resulting obligations to their employees. Furthermore, our business partners are obligated to share these principles with their **suppliers** as well and to ensure compliance.

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

### 3.3.3 Sideline activities and governing body memberships

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

The **assumption of an office** 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 permitted to assume such duties only after they have been approved.

Rewards given to business partners and customers must be appropriate.

The Daimler Truck Group also expects ethical conduct from its business partners.

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

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

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

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

The assumption of offices for other companies requires approval.

## OUR INTEGRITY CODE, IC

### 3.3.4 Shareholdings

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

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

## 3.4 Sustainability and social responsibility

### 3.4.1 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 place special importance on the rights stated in the International Bill of Human Rights and the **core labor standards** of the **International Labour Organization (ILO)**.

The Daimler Truck Group rejects all forms of **discrimination** in hiring and employment, slavery, child labor, threats against people who defend human rights and other human rights violations. The protection of the fundamental labor rights is important to the Daimler Truck Group.

We work towards ensuring that also our business partners, especially **suppliers and their subcontractors**, also observe these 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.

### 3.4.2 Environmental protection

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

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

Shares held in business partners or competitors must be disclosed.

We respect human rights and the core labor standards of the ILO.

We place special emphasis on the protection of fundamental labor rights.

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

We strive to achieve an exemplary ecological and energy balance worldwide.

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

## OUR INTEGRITY CODE, IC

Daimler Truck Group, taking into account the [product life cycle](#) from [design](#) to production to disposal or recycling.

We design every stage of production to be as eco-friendly and energy efficient as possible in order to minimize our environmental impact and energy consumption.

### 3.4.3 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**.

### 3.4.4 Donations and sponsorship

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 communities - around the world."

In our communities, the Daimler Truck Group supports a wide variety of initiatives aimed at furthering the advancement of society and promoting [equal opportunity](#) at the local level. **We strengthen communities**, promote social issues, education, science, art and culture, sports, traffic safety and also nature conservation. We support and encourage our employees' participation in Daimler-sponsored volunteering activities.

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

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. Party donations are subject to a decision by the Daimler Truck Holding AG and Daimler Truck AG Board of Management. Political contributions must also undergo a special approval process.

## Volunteering

We conduct a reliable dialogue with governments and organizations.

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

The Daimler Truck Group contributes to the advancement of society and promotes equal opportunity.

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

Donations to and sponsorships involving political organizations require approval.

## OUR INTEGRITY CODE, IC

**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.

### 3.5 Digitalization

#### 3.5.1 Handling data

The digital revolution is creating new work processes, business areas and mobility concepts. Data enables innovative services that offer added value for our customers and employees. The principles of our **Data Vision** describe how we want to exploit future opportunities and focus on the needs of our customers and employees:

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

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

These principles extend beyond data protection. They describe the responsible and legally compliant handling of data as a whole, even if the data is not personal. Our aim is to consider data protection from the very beginning, analyze data intelligently and store, share and use it responsibly. We are **transparent** with our employees, business partners and customers about how we handle their data, and we provide them with the choice of whether and how we use their data.

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

#### 3.5.2 Social media

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

We support volunteering by our employees.

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

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

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

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

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

## OUR INTEGRITY CODE, IC

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

Examples of other unacceptable posts include those which:

- convey subversive content.
- offend the dignity of other users.
- threaten harmony within the company.
- discredit our reputation and the reputations of our employees.
- harm our relations with key stakeholders.

### 3.5.3 Artificial intelligence

**Artificial Intelligence** (AI) comprises various methods used to attempt to automate intelligent skills. The broad term "AI" is often used today in the narrow sense of the current advances in machine learning. AI has already been implemented in some of our products and processes and will have greater and greater impact on our products, working methods and employees in the future.

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

## 4 Complying with the Integrity Code

### 4.1 Scope of application

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

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

### 4.2 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 an example** by behaving ethically, thereby giving employees guidance. Our managers are committed to excellent performance. At all times, they observe our [corporate principles and behavior guidelines](#) and the provisions of this Integrity Code. As they do, they serve as inspirational examples to their team members.

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

Artificial intelligence is used to attempt to automate intelligent skills.

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

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

The Daimler Truck Group expects its managers to set an example for others.

## OUR INTEGRITY CODE, IC

Our managers behave with **respect** towards their staff and promote team spirit within their units. They provide their staff with the appropriate knowledge and enable them to act responsibly. 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.

### 4.3 Managing errors

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

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

### 4.4 Treatment of violations

Violations of laws, policies and other regulations can cause **massive 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 markets. For these reasons, violations must be detected in a timely manner in order to prevent the Daimler Truck Group and its employees from suffering harm, thereby ensuring fair treatment of one another. If we as employees observe rules or regulations being violated or have reason to suspect that a violation of a rule or regulation has been committed, we do not hesitate to address it.

The **whistleblower system BPO** (**Business Practices Office**) is open to all employees, business partners and third parties who wish to report violations of rules or regulations that pose a serious threat to the company and its employees. If employees wish to report violations posing a minor risk, the company has **other contact points** available for them to contact.

The BPO accompanies the processing of tip-offs until the case has been closed. While doing so, the BPO strives to maintain the highest possible level of **confidentiality**. Moreover, our whistleblower system places value on fairness – in dealing with both whistleblowers and employees affected by an allegation. The BPO always applies the principle of proportionality. We examine each case individually to

Managers promote a culture of respectful interaction.

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

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

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

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

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

## OUR INTEGRITY CODE, IC

determine what consequences are suitable, necessary and appropriate.

If you have **evidence of violations**, please contact the BPO at [bpo@daimlertruck.com](mailto:bpo@daimlertruck.com).

### 4.5 Support and assistance

This Integrity Code cannot provide specific answers to every question and situation. If you are unsure and need guidance for your daily activities at work, you can find more detailed information and points of contact as an employee on the Daimler Truck homepage and on the Social Intranet.

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