

# **CODE OF CONDUCT**

## **for Suppliers and Business Partners**



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## FOREWORD

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TRATON SE is a global enterprise which brands are steeped in tradition and operate in many areas of business. Being this kind of a company means TRATON SE has a responsibility as a corporation to customers, employees, the public, and the environment. This responsibility includes compliance with the laws in force everywhere and at all times as well as respecting ethical values and acting sustainably.

Conducting a responsible business is a key priority for TRATON SE. Therefore, TRATON has set itself binding guidelines in its Code of Conduct for acting in an ethical manner. In addition to that, the “Volkswagen Group requirements for sustainable development with regard to the relationships with business partners (Code of

Conduct for Business Partners)” apply to TRATON SE. You can find these requirements via the following link: <http://www.vwgroupsupply.com> (>> Cooperation >> Sustainability).

They are supplemented by the following requirements of the TRATON Supplier and Business Partner Code of Conduct based on the principles of the United Nations Global Compact, relevant conventions of the International Labour Organisation and internal standards and values.

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## SCOPE OF APPLICATION

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In line with the strategy pursued by TRATON SE, the Company expects its suppliers (i.e. all contracting parties that supply TRATON SE with goods, materials, or services) and business partners (including business partners with an intermediary and/or representative function that act in the interests or on behalf of TRATON SE in a sales support capacity, such as consultants, agents, trading representatives, authorized dealers/importers, joint venture and syndicate partners, etc.) and their employees to act responsibly and undertake to observe the basic principles outlined in this TRATON Supplier and Business Partner Code of Conduct. If the suppliers or business partners commission third parties (e.g. subcontractors or representatives) in their business dealings with TRATON SE, TRATON expects these third parties to also observe the principles laid

down in this TRATON Supplier and Business Partner Code of Conduct.

TRATON SE reserves the right to demand self-assessments and to send experts to inspect the business premises of its suppliers and business partners for compliance with the requirements listed below on a case-by-case basis. Advance warning will be given of such inspection, which will take place during normal business hours in the presence of a representative from the supplier or business partner and in compliance with the applicable law, particularly with data protection laws. In these situations, TRATON SE expects suppliers or business partners to cooperate and transparently display requested documents and other information.

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## 1 | HUMAN RIGHTS AND LABOUR RIGHTS

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TRATON SE expects its suppliers and business partners to comply with all rules and regulations in force and to especially observe the basic principles that follow.

### Human rights

TRATON suppliers and business partners respect and protect the regulations in force worldwide to protect human rights as a fundamental and general requirement. This also involves TRATON suppliers and business partners refraining from employing forced or child labour. Suppliers and business partners comply with the rules laid down in ILO Conventions 138 and 182 concerning the minimum age of employment for children.

### Equal opportunity and non-discrimination

TRATON suppliers and business partners do not discriminate on grounds of ethnic, national, or social origin, skin colour, sex, religion, views, age, disability, sexual orientation, political views insofar as they are based on democratic principles and tolerance toward those of a different opinion, or any other legally protected characteristics unless the law requires otherwise.

### Freedom of association

The basic right of all employees to form trade unions and employee representations and to join them is recognized. In countries where this right is restricted by local laws, alternative legitimate options for employee participation are to be supported.

### Product safety

TRATON suppliers and business partners comply with all applicable legal product safety regulations and requirements, particularly legal requirements pertaining to the safety, labelling, and packaging of products as well as the use of dangerous substances and materials.

### **Safety in the workplace and working hours**

TRATON suppliers and business partners comply with the relevant legal regulations for health and safety in the workplace. They support the further development and improvement of working conditions. Working hours correspond at least to the respective national legal standards or the minimum standards of the respective national economic sectors.

### **Minimum wage**

TRATON suppliers and business partners ensure that their employees are commensurately remunerated corresponding at the very least to the legally valid and guaranteed minimum. Where legal or collective bargaining agreements do not exist, compensation and benefits are based on industry-specific collective agreements customary to the respective location that ensure an appropriate standard of living for the employees and their families.

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## **2 | ENVIRONMENTAL AND CLIMATE PROTECTION**

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TRATON wants to make a significant contribution to environmental and climate protection, and has thus adopted a Group-wide climate strategy. TRATON expects its suppliers and business partners to especially observe the basic principles that follow.

### **Compliance with legal provisions**

TRATON suppliers and business partners take responsibility when it comes to environmental protection concerns and comply with all applicable legislation relating to the environment and sustainability.

### **Increase energy and resource efficiency**

TRATON suppliers and business partners use natural resources sparingly and minimize environmental pollution in their production processes and products. They contribute to reducing energy consumption and CO<sub>2</sub> emissions.

### **Implementation and application of environmental management systems**

TRATON suppliers and business partners continuously improve their environmental performance. Suppliers and business partners with production sites implement suitable environmental management systems (e.g. in accordance with ISO 14001 or the EMAS Directive of the European Union).

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## 3 | TRANSPARENT BUSINESS RELATIONSHIPS

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Openness and transparency are key to credibility and trust in business practice. TRATON expects suppliers and business partners to especially observe the basic principles that follow:

### **Avoiding conflicts of interest**

TRATON suppliers and business partners take decisions based solely on objective criteria and do not allow themselves to be guided by personal interests or relationships.

### **Prohibition of corruption**

TRATON suppliers and business partners do not tolerate corruption. They ensure that their employees, sub-contractors or representatives do not grant, offer or accept any bribes, kickbacks, inadmissible donations, or other inadmissible payments or benefits to or by customers, officials or other third parties. This also applies to so-called “facilitation payments” (e.g. illegal payments to accelerate administration matters that are routinely encountered).

### **Gifts, hospitality, and invitations**

TRATON suppliers and business partners do not offer TRATON employees or third parties any inappropriate benefits either directly or indirectly in the form of gifts, hospitality, or invitations to unduly influence them. Neither do they ask for, nor accept such benefits.

### **States as customers and dealing with authorities**

TRATON suppliers and business partners consistently comply with the strict legal provisions when dealing with governments, authorities, and public institutions. When taking part in a public solicitation for bids, they comply with legal regulations and abide by the rules of free and fair competition.

### **Consultants and agents**

TRATON suppliers and business partners only employ consultants or agents in line with the laws in force. They take particular care to ensure that consultants or agents are only remunerated for consulting and agency services actually rendered and that the payments are commensurate with the performance rendered.

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## 4 | FAIR MARKET CONDUCT

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TRATON is a fair and responsible market participant and adheres to its contractual obligations. TRATON also expects the same from its suppliers and business partners and especially expects them to observe the basic principles that follow.

### **Free competition**

TRATON suppliers and business partners comply with the antitrust legislation in force. In particular, they do not enter into any anti-competitive agreements with competitors, suppliers, or customers. If they are in a dominant position on the market, they do not abuse this position.

### **Export control**

TRATON suppliers and business partners make sure that they comply with all applicable legal provisions for importing and exporting goods, services, and information.

### **Money laundering**

TRATON suppliers and business partners only conduct business relationships with business partners of whose integrity they are convinced. They ensure that the applicable legal money laundering provisions are not breached.

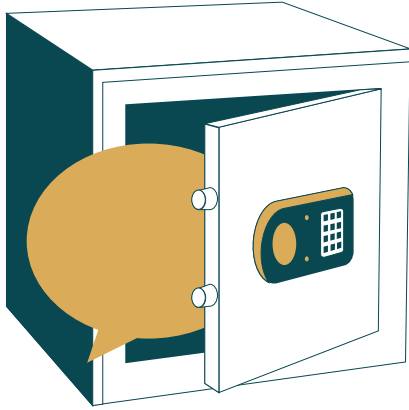
### **Business information**

TRATON suppliers and business partners publish business information and report on their business activities truthfully and in line with the laws in force.

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## 5 | PROTECTION OF DATA, BUSINESS SECRETS, AND COMPANY ASSETS

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Confidential data, business secrets, and company assets have to be protected. TRATON expects suppliers and business partners to especially observe the basic principles that follow.

### **Data protection**

TRATON suppliers and business partners observe all laws in force to protect the personal data of employees, customers, suppliers, and other parties concerned.

### **Protection of know-how, patents, trade and business secrets**

TRATON suppliers and business partners respect the know-how, patents, trade and business secrets of TRATON and third parties and do not pass such information on to third parties without the express prior written consent of TRATON or in a way that is otherwise inadmissible.

### **Handling company assets**

TRATON suppliers and business partners respect TRATON's tangible and intangible assets and do not use them for unfair or non-business purposes. They ensure that their employees as well as any third parties they commission in the business relationship (such as subcontractors or representatives) neither damage nor misuse TRATON assets, i.e. use these assets contrary to TRATON's interests.

### **Security of the international supply chain**

TRATON suppliers and business partners have to ensure that the business premises and the loading and shipping areas where products for TRATON are produced, stored, prepared, loaded and transported, are protected against unauthorized access within a safe and secure supply chain, and that all employed staff is reliable.

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## 6 | LEGAL CONSEQUENCES OF VIOLATING THE TRATON SUPPLIER AND BUSINESS PARTNER CODE OF CONDUCT

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TRATON SE considers compliance with the requirements set out in this document to be essential to its contractual relationships. If a TRATON SE supplier or business partner does not observe the basic principles laid down in this Code of Conduct, TRATON is entitled to terminate the business relationship with this supplier or business partner for cause. It is within the

discretion of TRATON to forgo such consequences and, instead, to take alternative measures if the supplier or business partner provides credible assurance and is able to prove that it has immediately initiated countermeasures to prevent comparable violations occurring in future.