

DAIMLER

# Our Integrity Code

Doing the Right Thing.



# Contents

- 01 Introduction  
p. 4
- 02 What We Stand For: Our Understanding of Integrity  
and Our Corporate Principles  
p. 6
- 03 How We Work: Our Behavior Guidelines  
p. 8
- 04 Complying with the Integrity Code  
p. 32
- 05 Glossary  
p. 35



## Foreword

Dear employees,

When Carl Benz and Gottlieb Daimler built the first motorized vehicles, their toughest competition was the horse, of which many of their contemporaries were convinced that nothing and no one was better than. Nonetheless, the motorcar went on to become the most important means of transport in everyday life – and more than 135 years later, Daimler is still one of the leading vehicle manufacturers worldwide. Looking at our past, one can see that we prevailed against the horse and the competition because every new generation at Daimler has met the challenges of its time.

What about present-day challenges? New technologies, customer requirements and competitors – our environment is changing and much more has happened since Carl's and Gottlieb's time. The economy has become more global and society much more diverse. As the demands on technology continue to rise, we continue to evolve our expectations of our conduct as a responsible company.

Our conviction remains the same: acting with integrity is important to us. That is the basis of our actions.

We have therefore adapted the Daimler Integrity Code to be in line with current times. Employees from various parts of the world and from different areas of the company have contributed to the process. This Code offers all of us guidance on a daily basis and in critical situations, and helps us to make the right decisions.

We are certain that we can only be successful in the long term if we fulfill our corporate responsibility locally and globally. Every individual is needed for this: let us act in a way that Carl and Gottlieb, and all the others who have helped determine our company's path over the generations, would be proud of. That way Daimler will stay on the right track in the future.

Board of Management f. l. t. r.: Ola Källenius (Chairman of the Board of Management/Mercedes-Benz Cars), Martin Daum (Daimler Trucks & Buses), Renata Jungo Brüngger (Integrity and Legal Affairs), Wilfried Porth (Human Resources and Director of Labor Relations & Mercedes-Benz Vans), Markus Schäfer (Group Research & Mercedes-Benz Cars Development), Britta Seeger (Mercedes-Benz Cars Marketing & Sales), Hubertus Troska (Greater China), Harald Wilhelm (Finance & Controlling/Daimler Mobility)



# 01 Introduction



At Daimler, we strive to always  
be the best.

Those who work at Daimler<sup>1</sup> know that we strive to always be the best. We want to develop advanced technologies, build amazing vehicles and offer intelligent mobility solutions. This [commitment to excellence](#)<sup>2</sup> also applies to how we deal with each other, our customers and our business partners. We also want to fulfill our social responsibility in an exemplary manner.

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

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

We expect all of our employees  
to act with integrity.

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<sup>3</sup> of Daimler AG as well as employees at controlled Group companies of the Daimler Group.

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

The foundation of our work at Daimler is built on our four corporate values: respect, passion, discipline and integrity. We show **respect** for our employees, 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.

<sup>1</sup> When this Integrity Code mentions „Daimler,“ it refers to Daimler AG and controlled Group companies of the Daimler Group.

<sup>2</sup> Colour-coded terms in the main text are explained in the glossary.

<sup>3</sup> To make this Code easier to read, the text uses only the male forms of pronouns for natural persons. The words “he,” “his” and “him” are always intended to include all individuals, regardless of gender identity. The term “employee” also includes managers at all levels and members of managing bodies.



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

**Integrity** plays a central role at Daimler 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**. In other words, we adhere to internal and external rules, we act according to our corporate values and we 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.



# Our Corporate Principles

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

When working, we aim to strike a balance between profitability, 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 are the people who work for Daimler and the passion with which they do so. Accordingly, we invest in the personal development of our employees. Sustainable treatment of the environment is important to us, which is why we protect it and use our resources responsibly. Our aspiration is to strike a balance between profitability, people and the environment.

## We act responsibly and respect the rules

We follow laws and rules and take responsibility.

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

## We address issues openly and stand for transparency

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

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

Our collaboration is based on trust, fairness and respect.

At Daimler, 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

The diversity of our workforce is one of our strengths.

At Daimler, [diversity](#) is not simply a matter of complying with legal requirements. At Daimler, our strength lies in the differences between our employees, which are a key factor in our success. Their varied skills, perspectives and experiences form the basis of innovation and help us to understand the needs of our customers worldwide. Our corporate culture is characterized by respect, tolerance and team spirit.



# 03 How We Work: Our Behavior Guidelines





# Principles for Working Together

## Diversity and equal opportunity

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

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

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

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.

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

At Daimler, 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 at Daimler. It is our shared duty to create a fair, tolerant, respectful and friendly working environment.



#### Health and safety

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

## Representing Daimler

We coordinate external publications with the communications unit.

It is everyone's business to handle corporate information responsibly. Therefore, Daimler 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.

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

Daimler employees have the right of 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 employees, we ensure that we identify our **personal views** as such.

## Health and safety

Safe working conditions are one of our top priorities.

One of Daimler'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**.

We want to prevent work-related accidents and illnesses.

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

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

At Daimler, 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.

Daimler offers its employees prevention programs for their health.

Daimler offers country-specific programs designed to promote health and aimed at **prevention**, and Daimler 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.





#### Work-life balance

Daimler creates conditions that support a work-life balance.

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Our **workplace culture** is based on trust and respect. Daimler 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.

## Conflicts of interest

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

Daimler respects the personal interests and the private lives of its employees. Every employee has to make sure that personal and private financial interests do not influence business decisions.

If conflicts of interest arise, we disclose them.

Therefore, we avoid situations in which personal or private financial interests conflict with the **interests of our company** or business partners. If such **conflicts of interest** arise, we disclose them and seek a solution with the respective manager which does not harm the interests of the Daimler Group.

**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.

## Working with employee representatives

We engage in constructive collaboration with employee representatives.

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

## Use of resources

We use resources carefully and sustainably.

We use resources carefully and sustainably. We do so because of our social and environmental responsibility, out of respect for and as an obligation to our shareholders, and because it is in our **own interest** to work in a company that operates sustainably.

We use company resources only for official purposes.

As a rule, we use the company's materials, intellectual property, assets and other resources only for official purposes. Exceptions apply when company regulations allow the **personal use** of company resources. **Wastefulness** in the use of resources diminishes the company's assets and may also cause **reputational damage**. We therefore make sure that we ourselves and those around us use resources responsibly and economically.

We protect information because it is valuable.

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

Special protection is given to business secrets.

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



# Compliance with Laws

## Product safety and compliance with technical regulations

We are designing the mobility of the future to be as safe as possible.	The quality of our products has a high priority for us at Daimler. 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 <b>to make the mobility of the future as safe as possible.</b>
We use technological advancements to reduce emissions and greenhouse gases.	Through the technological advancement of our products, we are pursuing the goal of <b>reducing emissions</b> 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.
We ensure the regulatory conformity of our products.	Throughout the <b>product life cycle</b> , we ensure the legal and <b>regulatory conformity</b> 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 <b>corporate principles</b> as well as established and communicated structures and procedures.
As experts, we strengthen the confidence in our products.	As employees, we play a central role. <b>From initial conception to end of life and disposal</b> of our products, we as experts contribute to meeting legal and internal requirements as well as the expectations of our customers and society, helping to strengthen their confidence in our products.
We consider the possible impact of our actions in everything we do.	We know the regulations that affect our areas of responsibility and ensure that our level of knowledge is always up to date. In every phase of our products' life cycle, we think about the possible impact of our actions. We openly address <b>potential risks</b> in our areas of responsibility ( <b>speak-up culture</b> ).

## Tax and customs regulations

We comply with applicable tax and customs regulations.	At Daimler, we comply with the provisions of <b>tax and customs laws</b> , which include regulations on corporate tax, income tax and value-added tax, as well as the customs duties and excise tax to be paid on imports of goods.
We reject aggressive tax avoidance schemes.	Correct and timely declaration of taxes and duties is a basic principle for Daimler. We do not use aggressive or even illegal <b>tax avoidance schemes</b> . Aggressive anti-tax policy does not reflect our aspirations of sustainable corporate policy.



**Product safety and compliance  
with technical regulations**

The quality of our products is  
one of the top priorities for us  
at Daimler.

## Antitrust law

Well-functioning competition is a fundamental pillar of our economy.	Well-functioning and free <b>competition</b> 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.
We are committed to protecting fair competition.	Daimler, too, benefits from functioning competition because the laws also protect us from <b>unlawful agreements</b> and excessive prices. We are committed to ensuring fair competition in our markets and to following applicable antitrust and competition laws.
	<p>Antitrust risks occur in a wide variety of situations, for example:</p> <ul style="list-style-type: none"> <li>– when exchanging information and benchmarking with competitors</li> <li>– as part of investments in shareholdings and during cooperation</li> <li>– in connection with customer service and sales</li> <li>– regarding the permissibility of sales incentives</li> <li>– when engaging in trade association activities.</li> </ul>
Every employee knows the rules that apply to their unit.	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 which are relevant to their business unit.

## Foreign trade legislation

We comply with all regulations under foreign trade laws.	Strict compliance with regulations of foreign trade legislation is a basic principle for global companies like Daimler. Foreign trade regulations must always be observed when exporting both tangible and intangible goods as well as services. Fundamental restrictions are placed on <b>military goods</b> and civil products that can also be used for military purposes.
We act with strict compliance regarding embargoes.	Furthermore, certain goods and countries fall under special restrictions, such as <b>arms or luxury goods embargoes</b> . Every employee ensures strict compliance with regulations under foreign trade laws applicable to their area of responsibility.

## Economic sanctions and money laundering prevention

We observe sanctions and support the fight against money laundering and terrorism financing.	As a global corporation, we comply with national and international <b>economic sanctions</b> and support the community of states to <b>fight against money laundering and terrorism financing</b> . Daimler complies with all requirements in these areas.
We design our business processes so that they prevent financial crime.	Employees of the involved units are required to always keep up to date on current <b>sanctions lists</b> . The employees responsible for the business processes are obligated to design these in such a manner that they prevent all forms of financial crime.

## Intellectual property protection

Our patents are some of our most important resources and must be protected.	Daimler AG owns numerous <b>patents</b> and other property rights, such as <b>trademarks</b> and <b>designs</b> . 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.
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#### Intellectual property protection

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## Insider trading legislation and ad-hoc announcements

We are committed to fair securities trading and guard against insider trading.	Misuse of inside information is prohibited. Our company is committed to fair <b>securities trading</b> . We take all necessary and appropriate actions to prevent <b>insider trading</b> at our company.
Information that could have a significant effect on our share price is promptly disclosed by us in the form of an ad-hoc announcement.	As a stock listed company, Daimler is under a legal obligation to publish Daimler-related inside information without delay in the form of an <b>ad-hoc announcement</b> . As long as the announcement has not been published, the respective information may not be shared without authorization or used for securities transactions.
	<p>Examples of possible <b>inside information</b> include surprising:</p> <ul style="list-style-type: none"> <li>– financial results</li> <li>– changes in earnings projections or order situation</li> <li>– changes in dividend</li> <li>– planned mergers, partnerships or takeovers</li> <li>– significant technical innovations</li> <li>– important changes in management organization</li> <li>– changes in important business relations.</li> </ul>
We do not use confidential information to gain an advantage in stock trading.	All employees help ensure that inside information is published <b>without delay</b> 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.

## Corruption prevention

We do not give or take bribes.	At Daimler, we have a clear understanding of <b>what kind of business we will or will not do</b> . We do not give or take bribes. We impress our business partners and customers with our products and services and not through undue influence. We also do not allow others to exert undue influence on us. Instead, we make decisions for objective and verifiable reasons.
We do not leave any room for corruption because it is detrimental to competition and the common good.	Daimler <b>does not tolerate corrupt behavior</b> by its employees, business partners or customers. Decisions involving <b>corruption</b> distort competition, harm the company's assets and reputation, and go against the common good. To prevent possible harm to Daimler, we avoid even the mere appearance of undue influence.
When dealing with government authorities, we avoid the mere appearance of an undue influence.	<p>We also act in accordance with our <b>corporate principles</b> when in contact with government agency employees, public officials, politicians and employees of government-owned enterprises. <b>We avoid even the mere appearance</b> 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.</p> <p>Through regular training and audits, we ensure that corrupt behavior is prevented, detected and punished.</p>



#### Gifts and invitations

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



# Dealing with Business Partners

## Gifts and invitations

Gifts and invitations are permitted within appropriate limits.

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

We reject inappropriate rewards from business partners.

As employees, we 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.

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

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

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

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

We document the acceptance of rewards above the reference values.

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

Rewards given to business partners and customers must be appropriate.

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

## Choosing business partners

Daimler also expects ethical conduct from its business partners.

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

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

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

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

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

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

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

## Sideline activities and governing body memberships

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

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 offices for other companies requires approval.

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.

## Shareholdings

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

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.

Shares held in business partners or competitors must be disclosed.

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.



Environmental protection  
We strive to achieve exemplary  
environmental and energy  
performance worldwide.



# Sustainability and Social Responsibility

## Respect for human rights

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

Daimler 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 \(ILO\)](#).

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

Daimler 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 Daimler.

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

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](#).

## Environmental protection

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

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

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

Our ambition is to develop products that are **particularly environmentally friendly and energy-efficient** in their respective market segments. Our approach to environmentally friendly and energy-efficient design covers the entire product spectrum of the Daimler 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. We take internal and external measures to ensure transparency concerning our environmental impact.



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

## Representation of political interests

We conduct a reliable dialogue with governments and organizations.

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

## Donations and sponsorship

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

For us, business success and social responsibility go hand in hand. Through **Daimler WeCare**, 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."

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

In our communities, Daimler 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.

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

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

Donations to and sponsorships involving political organizations require approval.

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

## Volunteering

We support volunteering by our employees.

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



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



# Digitalization

## Handling data

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

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

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

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

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

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

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



## Social media

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

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

We are an open-minded, global organization. As described in our [corporate principles](#), **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.

## Artificial Intelligence

Artificial Intelligence is the attempt to automate intelligent skills.

The field of [Artificial Intelligence](#) (AI) encompasses various methods that attempt to automate intelligent skills. Today, the broadly defined term “AI” is often used in a more narrow sense of current progress in the field of machine learning. AI has already been implemented in some of our products and processes and will have 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.

# 04 Complying with the Integrity Code





## Scope

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

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

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

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

## What we expect of our managers

Daimler expects its managers to set an example for others.

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

Managers promote a culture of respectful interaction.

Our managers behave with **respect** toward 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.

## Managing errors

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

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

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

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.

## Treatment of violations

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

Violations of laws, policies and other regulations can cause **massive financial losses**, involve the risk of fines being imposed on Daimler 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 Daimler 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.

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

The **whistleblower system BPO (Business Practices Office)** is open to all employees, business partners and third parties who wish to report violations of rules or regulations that pose a 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.

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

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

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

## Support and assistance

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

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

If you have questions about acting with integrity or this Integrity Code, please feel free to contact the Infopoint Integrity. You can reach the **Infopoint Integrity** at [info.integrity@daimler.com](mailto:info.integrity@daimler.com).

# 05 Glossary



Ad-hoc announcement	Public announcement by a listed company. Such announcements include insider information, i.e. information related to the company which might affect stock market prices of the company's shares.
Artificial Intelligence	There is no universally consistent definition of Artificial Intelligence (AI). We have the following understanding: "Artificial Intelligence includes various methods that attempt to automate intelligent skills. The broad term 'AI' is often used today in the narrow sense of the current advances in machine learning. 'ML' is a subset of AI methods and is based on mathematical methods that find complex patterns in datasets. Again, a subset of machine learning is deep learning. It makes it possible to find complex patterns in very large amounts of data using (deep) neural networks."
Bullying	Prolonged, successive and overarching animosity, victimization or discrimination hurting the affected person.
Business Practices Office (BPO)	Whistleblower system at Daimler, which is open to all employees and business partners to address risks and high-risk violations. High risks include offenses such as corruption, antitrust law violations and money laundering.
Commitment to excellence	Aspiration to create exceptional services and products in order to become a market leader in the respective sector.
Conflict of interests	A conflict of interests may arise whenever personal or individual financial interests collide with those of Daimler or of business partners. If the conflict of interests cannot be resolved, the individual may need to be removed from a certain office or function. Conflicts of interests may arise in connection with gifts, invitations, sideline activities and shareholdings in competitor companies.
Core labor standards of the International Labour Organization (ILO)	Social standards created by the International Labour Organization (ILO) within the world trade order to ensure decent working conditions and worker protection.
Corporate principles and behavior guidelines	<p>Corporate principles are basic guidelines based on our corporate values that describe our self-image. They guide the employees in their day-to-day operations and are to be shared and lived by all employees.</p> <p>Behavior guidelines are specific rules that are binding for all employees. They are in keeping with the corporate values, corporate principles and the mandatory internal and external guidelines.</p>
Corruption	Abuse of an office or position in order to obtain an advantage. One common instrument of corruption is bribery.
Daimler WeCare	As a globally active company, the promotion of social progress all over the world is an area of concern and obligation. With our help and support, we create recognizable benefits.
Data Vision	The aspiration of Daimler concerning the handling of data: "We stand for sustainable data-based business models. That is why we focus on the needs of our consumers and employees and handle data responsibly." The Data Vision follows seven principles: Business Potential, Consumer Benefit, Data Quality, Transparency, Choice, Data Security and Data Ethics.
Design	Design provides protection for the appearance of a product. Any industrial or handicraft item can be protected. The requirements for protection are that the design is new on the date of filing the application and differs from previous designs (so-called individual character). However, the German Patent and Trade Mark Office (DPMA) does not examine compliance with these requirements before the design is registered. It is only examined by the civil courts in case of a dispute. The registration gives the owner the exclusive right to use the design. Design protection can last for 25 years from the filing date.



Discrimination	Applying categories (such as social background, gender, skin color, religion, etc.) to create, explain and justify unequal treatment without objective reason.
Diversity	Individual differences within a group of people like gender, age, origin, sexual orientation and other characteristics.
Ecological and energy balance	Ratio of energy consumption to energy use, especially in terms of impact on the environment.
Embargo	Government order prohibiting trade with a specific country.
Equal opportunity	To employ, support and promote all employees according to their skills, capabilities and performance irrespective of gender, age, origin, religion and other personal characteristics.
Global Compact	United Nations initiative for responsible corporate management. The Global Compact pursues the objectives of an inclusive and sustainable world economy based on ten universal principles on human rights, labor standards, environment, anti-corruption and sustainable development goals.
Inclusion	The conscious, integrative and appreciative approach to diversity, with the objective of including and treating all employees in an equal and fair manner.
Insider trading	Stock exchange transactions where an investor uses previously unreleased relevant information that would heavily affect stock prices after its publication in order to gain an advantage over other investors.
Integrity check	Measures to verify that potential business partners comply with Daimler's value standards and, for example, do not engage in unfair or illegal practices.
Money laundering	Channeling of illegally generated funds into the legal economic cycle.
One Voice Policy	Uniform principles in external communication. The aim of the One Voice Policy is to ensure a company-wide consistent and coherent communication based on uniform publication principles. For this reason, employees who are authorized to communicate with the media should only communicate information approved by the Communications unit. This does not apply to sales-supporting communication media such as product brochures or price lists, for which the marketing unit is responsible.
Other contact points	To report violations of low risk, employees can contact, for example, their managers, the responsible human resource department, corporate security or the works council.
Patent	Intellectual property right for innovative products, technologies and procedures. A patent guarantees its owner the exclusive right to decide whether and how third parties may use the protected invention. The protection period of German patents is 20 years.
Personal data	All information directly or indirectly related to an individual including, for example, name, address and age.
Product life cycle	All product life stages: design, production, disposal and recycling.
Regulatory conformity	Regulatory conformity in the context of product safety and conformity to technical regulations means compliance with national and international legal requirements, technical norms and standards, the state of the art in science and technology, and Daimler guidelines, as far as they stipulate technical standards.

Reputational damage	Damage to a person's or a company's public image. Actions causing reputational damage include violations of laws, internal and external rules and contracts. Antitrust violations, insider trading and bribery can pose an especially high risk.
Sanction	International coercive or penalizing measures against nations. Typical sanctions are, i.a. embargoes.
Social media	Platforms and networks where private users as well as public institutions and companies may upload their own contents and posts such as photos and videos, share experiences and views, and comment on or review the content of others. Some of the most popular social media platforms are Facebook, Twitter, Instagram, blogs, Wikipedia and YouTube.
Speak-up culture	Corporate culture where uncertainties and potential risks can be reported to the appropriate contact. This is to encourage each individual to freely voice their opinion and criticism.
Supervisory Board	Highest control committee at Daimler, whose main purpose is to supervise the executive management, i.e. the Board of Management.
Sustainability	Both present and future-oriented operating principles aimed at reconciling economic, ecological and social aspects.
Trademark	Trademarks are signs that distinguish products and services of an enterprise from those of other enterprises. Words, pictures, sounds, three-dimensional shapes, colors or other signs can be registered as trademarks in the Register of the DPMA (German Patent and Trade Mark Office), provided they can be represented graphically. German trademarks last for ten years and can be renewed indefinitely thereafter.
Undue influencing	Exertion of influence on a person by means of rewards, such as donations or non-cash gifts.
United Nations Guiding Principles on Business and Human Rights	The UN Guiding Principles on Business and Human Rights are a set of international guidelines for preventing human rights violations in the context of business activities. They also address the responsibility of business enterprises in this context.
Volunteering	Voluntary, uncompensated work designed to serve the public good.
Wastefulness	Careless, excessive use of (corporate) resources.

# Daimler at a Glance: Our Brands and Divisions

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## Mercedes-Benz Cars



AMG

MAYBACH



Mercedes me

EQ

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## Daimler Trucks



FREIGHTLINER



Thomas  
BUILT BUSES



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## Mercedes-Benz Vans



FREIGHTLINER

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## Daimler Buses



SETRA



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## Daimler Mobility

Mercedes-Benz Bank

Mercedes-Benz  
Financial Services

Daimler Truck Financial



Daimler AG is one of the world's most successful automotive companies. With its divisions Mercedes-Benz Cars, Daimler Trucks, Mercedes-Benz Vans, Daimler Buses and Daimler Mobility, the Daimler Group is one of the biggest producers of premium cars and the world's biggest manufacturer of commercial vehicles with

a global reach. Daimler Mobility provides financing, leasing, fleet management, insurance, financial investments, credit cards, and innovative mobility services.

More information: [www.daimler.com](http://www.daimler.com)

