



CONFIDENTIAL

SUPPLIER CODE OF CONDUCT CODE OF CONDUCT FOR BUSINESS PARTNERS

Preamble

The ACV Automobil-Club Verkehr e.V., hereinafter referred to as the -ACV- is keenly aware of its responsibilities vis-à-vis its customers, employees and the public. Hence, ACV has compiled ethical rules and regulations it imposes upon itself and that govern its business transactions. The ACV also expects its suppliers, service providers, contractors and cooperative partners (hereinafter referred to as business partners), who engage in business relations with the ACV to base all of their activities on the same ethical principles. For this reason, the ACV has developed a "Supplier Code of Conduct" that documents the mandates and principles for the cooperation with the business relationships with the ACV.

Laws and Ethical Principles

Business partners shall comply with all relevant laws, standards, guidelines and policies that apply to them. They shall support the principles of the "Global Compact" as well as the "Universal Declaration of Human Rights" of the United Nations along with the "Declaration on Fundamental Principles and Rights at Work" issued by the International Labour Organization – in congruence with any applicable national laws and traditions. This shall in particular apply to:

1. Human Rights

All business partners shall respect all human rights.

2. Child Labor

All business partners shall absolutely refrain from engaging in child labor and shall comply with the respectively applicable provisions regarding the prohibition of child labor.

3. Forced Labor

Business partners shall not tolerate any type of forced labor.

4. Compensation and Work Hours

All business partners shall comply with the respective domestic laws and provisions concerning work hours, wages and salaries as well as benefits provided by employers.

5. Discrimination

Business partners shall not tolerate any discrimination, in particular on the basis of race, skin color, ethnic background, political affiliation or union membership, religion, disabilities, sexual orientation, pregnancy, civil status, age or gender.

6. Workplace Safety

The ACV expects its business partners to implement workplace safety and to enforce health protecting precautions on a high level. Business partners shall comply with applicable labor and health protection standards and shall ensure that the work environment is safe and promotes the health of employees to maintain a healthy workplace and to prevent accidents, injuries as well as work-related diseases.

7. Planning of Operational Continuity

Business partners shall be prepared for all kinds of operational interruptions (for instance natural disasters, terrorism, computer viruses, diseases, pandemics, infectious diseases). In particular, all business partners shall have emergency contingency plans in place for disasters to protect both, their employees and the environment from the effects of potential disasters that occur within the environment of the company to the fullest extent possible.

8. Corruption/Bribery

Business partners shall not tolerate any corruption or bribery. They avert conflicts of interest that might lead to corruption risks.

In conjunction with working for the ACV, business partners shall accept invitations or extend them only if they are reasonable and are not extended in anticipation of illegal counter offers or other preferential treatment and if they do not violate applicable laws (in particular anti-corruption legislation).

The same shall apply to the acceptance or giving of gifts, other benefits or advantages of any kind.

9. Money Laundering

Business partners shall initiate required and suitable measures to prevent money laundering within their companies.

10. Data Protection

Business partners shall comply with all applicable European regulations, domestic laws and other standards aiming at the protection of personal data, especially data of employees, business partners and customers.

11. Anti-Trust and Competitive Fairness Legislation

All business partners shall comply with all relevant anti-trust and competitive fairness legislation provisions.

Specifically, they shall not enter into arrangements and agreements pertaining to prices, terms and conditions or strategies. Business partners shall refrain from sharing information that is sensitive from a competitive perspective and shall not engage in any conduct that restricts or may restrict competition in an illegal manner.

12. Environment

All business partners shall comply with the environmental standards and laws that apply to them and are committed to the principles of sustainable management and the protection of the environment.

13. Compliance with this Supplier Code of Conduct

The compliance with this Supplier Code of Conduct by its business partners is a fundamental and necessary prerequisite for the ACV for the company to establish and maintain business relationships. The business partners therefore undertake to comply with the principles listed herein. They shall communicate this Supplier Code of Conduct and the principles it describes to their sub-contractors and other business partners as well and shall advocate for the compliance with the former or equivalent principles by the former.

The business partner herewith confirms that business partner shall comply with this Supplier Code of Conduct.

Business Partner

Signed on behalf of the Business Partner