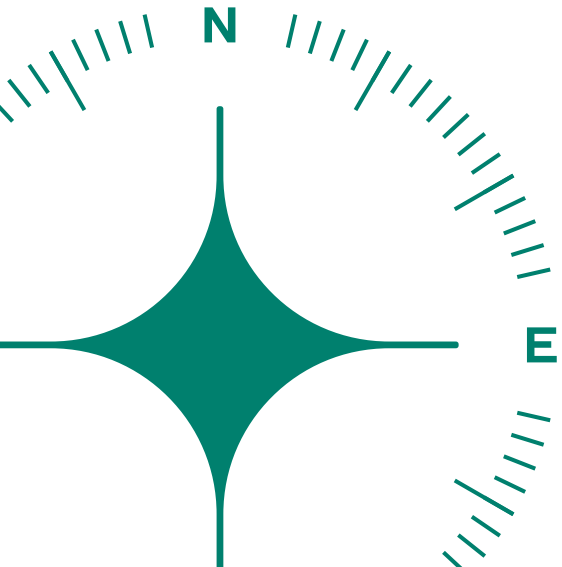
VOLKSWAGEN GROUP

OUR CODE



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SUPPORT

GROUP ESSENTIALS

The Group Essentials are our Group's foundation of values that connects all people in all brands and companies. They form the basis of our corporate culture.

I We take on responsibility for the environment and society.

II We are honest and speak up when something is wrong.

III We break new ground.

IV We live diversity.

V We are proud of the work we do.

VI We not me.

VII We keep our word.



We are one

The Volkswagen Group Code of Conduct, OUR CODE, is the ethical and values-based foundation for acting with integrity and in compliance with the rules in our Group. It serves as a binding guideline for all employees in all brands and companies – all over the world.

Together, we bear responsibility for our collaboration, our workplace, the environment, sustainability, and society. We approach one another and everyone else with respect and fairness, as equals. We take a stance, we are steadfast and courageous in standing up for our values and principles – regardless of time, economic or social pressure.

We are firmly convinced it is essential for each and every one of us – employees, members of the Board of Management and managers – to act with honesty in order to foster trust in our Company, our products, services, and innovations. That is why the decisions we take in all areas of work and in all roles must be in accordance with our corporate values, and comply with valid national and international laws, regulations, and internal voluntary commitments. This also holds true for the continued evolution of our Company as well as the choice, procurement, development, and use of innovative technologies such as artificial intelligence. Transparency is important to us and our approach to innovative technologies ensures that users' rights and security are respected.

We do not tolerate violations of the Code of Conduct. Anyone who violates our rules must expect appropriate consequences. To make sure that does not happen we seek advice and support so that together, we protect our Company, its values, and the reputation of all the brands.

Each of us is personally responsible for complying with **OUR CODE.** It is up to all of us to familiarize ourselves with the Code's principles and to be guided by them in our day-to-day decision-making. For a Group on the move, for the protection of people and the environment, and for future generations.

WE ARE COMMITTED INDIVIDUALS

We embrace our corporate values, principles and rules, thus promoting trustful, sincere and fair interaction with one another. We are all role models.



1.1 Human rights
1.2 Ethical leadership
1.3 Diversity, equal opportunities and equal participation
1.4 Speak Up
1.5 Employee representation

1.1 Human rights

We take responsibility for human rights

CORPORATE PRINCIPLE

Respect for human rights is of paramount importance. We are convinced that sustainable economic activity is only possible by acting ethically and with integrity. Within the framework of our entrepreneurial activities, we are fully committed to our responsibility regarding human rights. The Group Board of Management, the Volkswagen Group European Works Council and the Volkswagen Group Global Works Council have fulfilled this responsibility in the Group's Declaration on Social Rights, Industrial Relations and Business and Human Rights, known as the Social Charter.

We confirm our commitment to major international agreements and declarations, in particular the International Bill of Human Rights and the core labor standards of the International Labour Organization (ILO). Our entrepreneurial activities follow the UN Guiding Principles on Business and Human Rights (UN Global Compact), which determine the most important cornerstones for our actions.

MY CONTRIBUTION

As an employee, I can also make my contribution to respecting human rights. I regard human rights as a fundamental guideline, and I am vigilant against human rights abuse that is happening around me or of which I become aware.

If I have concerns regarding human rights abuse in my professional surroundings, I prevent it or stop it immediately. If necessary, I inform my supervisor or get in touch with any of the contacts listed in the chapter on "Support".



EXAMPLE

Someone has written to you with information that one of our suppliers is not paying their employees their correct wages and is violating labor law by tolerating 80-hour weeks. In addition, the pay of some of the supplier's employees is below the minimum wage.

Inform your superior and the Whistleblower System of your concerns about human rights abuse. Our Company will examine the allegations in greater detail and take the necessary measures. This may include terminating business relations with the supplier in question.

1.2 Ethical leadership

We lead based on our values

CORPORATE PRINCIPLE

We embrace our corporate values, principles, and rules, take responsibility for both personal and corporate growth, and lead by example. We perform our duties, and manage our powers and roles in an appropriate, fair and responsible manner. That also applies for personal relationships in the workplace, in particular insofar as existing employment or hierarchical dependencies may be exploited. Our decisions are always transparent, show good judgment, are guided by integrity, and are taken in the best interests of the Company and its employees, business partners and shareholders. We strengthen trust and shape change in the Company through our values-based leadership.

MY CONTRIBUTION

I am aware of my function as a role model both within the Company and in a broader context. My conduct and actions are always guided by integrity and a sense of responsibility, and are based on this Code of Conduct, our corporate values, principles and rules. I advocate interaction with one another in a spirit of trust, honesty, and fairness, and I am open to different points of view.

EXAMPLE

In order to complete a project to schedule, your team would like to skip one step in the process. They say the step is unnecessary. You point out that the valid rules must be followed, regardless of any pressure. Together, you search for a solution that complies with the requirements and our values. You undertake to revise the process in collaboration with everyone involved and, where possible, to make it leaner. You commit to that as a manager and team member.

1.3 Diversity, equal opportunities and equal participation

We live diversity

CORPORATE PRINCIPLE

Diversity, equal opportunities, and equal participation are important principles for fair, non-discriminatory, and respectful coexistence. We believe in cooperation in a spirit of partnership, in tolerance and in mutual respect. We foster diversity in the workforce and support an inclusive work environment.

We offer equal opportunities for everyone and reject all forms of discrimination. This applies in particular to unequal treatment due to ethnic or social origin, skin color, biological sex, nationality, language, religion, ideology, age, physical or mental disabilities, gender identity, sexual orientation, political views, or any other characteristics protected by law. We live diversity, actively support inclusion, and create an environment that not only encourages the engagement of all employees, but also fosters each employee's individuality in the interests of the Company.

Our employees are selected, hired, and developed based on their qualifications and their skills.

MY CONTRIBUTION

I observe the principles of diversity, equal opportunities and equal participation and encourage people around me to do the same.

If I see any violations of the principles of equal opportunities and equal participation, such as unequal treatment, harassment, and bullying, I make the persons involved aware of their misconduct. If I am not in a position to directly influence events, I notify the HR department of the incident immediately or get in touch with the contacts listed in the chapter on "Support".

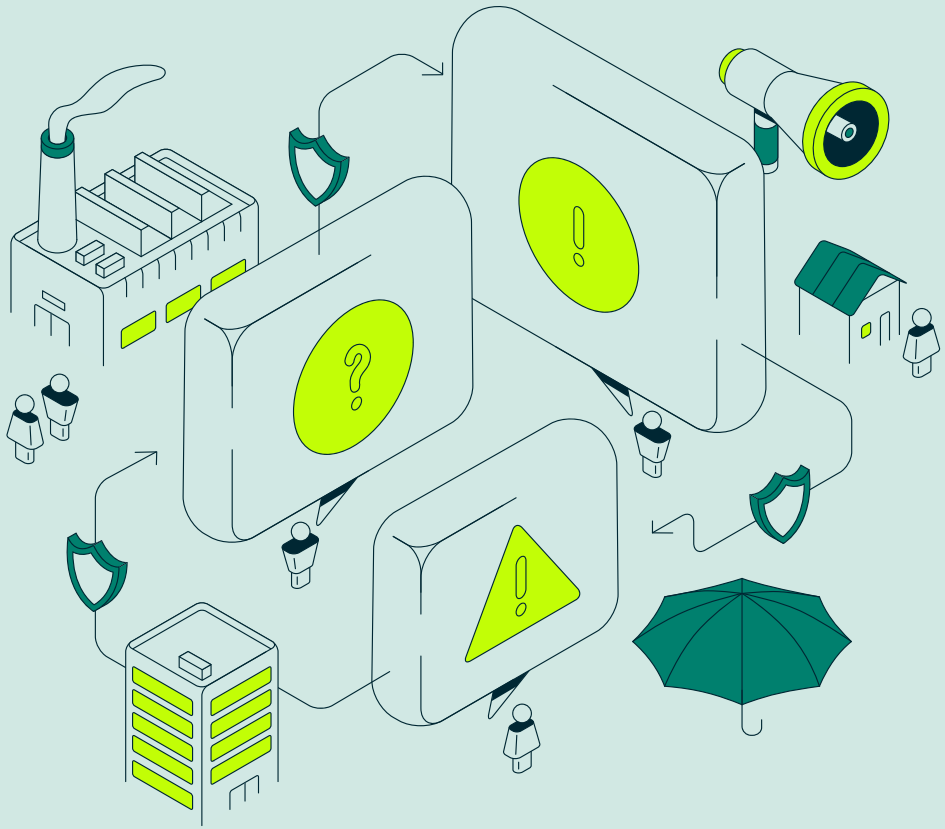
EXAMPLE

You hear some of the people you work with making disrespectful comments about people on account of their nationality, gender, sexual orientation, or skin color.

Either speak up straight away about this discrimination or get in touch immediately with one of the contacts listed in the chapter on "Support".

1.4 Speak Up

We speak up when something is wrong



CORPORATE PRINCIPLE

We want to learn from mistakes and continuously improve. That is why we speak up about wrongdoings, or as soon as something doesn't feel right, even if that is awkward and uncomfortable. To do that, we promote a culture of integrity and actively seek a dialog within our team and with our supervisors. We seek advice and support if we have questions and problems. We protect everyone who contributes to this culture.

For us, compliance with external and internal rules at all times is a given. We do not tolerate misconduct. We believe that turning a blind eye can never be the right solution. That is why we react immediately and appropriately to misconduct and violations of our rules.

Managers always lead by example through conduct that is in accordance with our rules and regulations. They perform this important function by supporting employees to comply with the rules, promoting an error culture, and following up on violations.

MY CONTRIBUTION

My first point of contact for questions, concerns, or the reasonable suspicion of a violation of internal or external regulations is my supervisor, or alternatively I can seek advice from the relevant subject matter experts. The HR department and employee representatives as well as Compliance are also available to provide support. In addition, I should report any reasonable suspicion of Serious Regulatory Violations via the Whistleblower System. As a Management Level employee, I am obliged to report any such suspicion.

EXAMPLE

The deadline for a decision proposal submitted to a committee has expired and you notice that you and your team have made a mistake. You know it is not possible to take a meaningful decision on the basis of the data submitted.

Inform your supervisor and the departments responsible for the committee immediately. Jointly find a way to correct the document. In addition, you and your team discuss how such errors can be avoided in future.

1.5 Employee representation

We work together in close partnership – constructive, cooperative and fair

We recognize the basic right of all employees to establish trade unions and employee representations.

We are committed to working with employee representatives in candor and trust, to conducting a constructive and cooperative dialog, and to striving for a fair balance of interests. Professional dealings with employee representatives are part of our corporate culture.

Safeguarding the future of the Group and its employees is achieved in a spirit of cooperative conflict management and social commitment, on the basis and with the goal of ensuring economic and technological competitiveness. Economic efficiency and job protection are equal-ranking and shared goals.

WE ARE RELIABLE COLLEAGUES

We take our responsibility in the workplace seriously and protect what is valuable for our team, our Company, and our customers.



2.1 Occupational health and safety
2.2 Handling Company assets
2.3 Security and protection of information, know-how and intellectual property

2.1 Occupational health and safety

We respect and promote health and safety

CORPORATE PRINCIPLE

We take our responsibility for the safety and health of our employees very seriously. We promote occupational health and safety in line with the provisions of national laws and regulations and with the occupational health and safety policy of the Company.

Occupational health and safety for all employees is fundamental to ensuring a sustainable future for our Company and to positioning our Company as an attractive employer. All accidents at work and work-related illnesses are generally preventable. We therefore aim to ensure the protection and promotion of physical and mental health. This requires the cooperation and participation of all.

MY CONTRIBUTION

I comply with occupational health and safety regulations and instructions. I do not endanger my own health and safety or that of my team or third parties. I support them, do not look the other way, and accept help.

Within my area of responsibility, I take all appropriate and statutory measures to ensure a safe working environment. I draw attention to unsafe actions or conditions.

I make an active contribution to maintaining and promoting my health by voluntarily participating in preventive healthcare and health promotion activities. I follow instructions, attend training, and align my daily actions with them.

EXAMPLE

You notice that a device in your department appears to have an electrical defect.

Do not activate the device and notify the responsible supervisor to coordinate further measures. It is not permitted to repair electrical equipment yourself because this might be dangerous.

2.2 Handling Company assets

We protect our assets – whether visible or invisible

CORPORATE PRINCIPLE

We respect the Company's tangible and intangible assets and do not use them for non-business purposes, but solely to achieve the Company's business objectives. Exceptions are possible if internal policies and guidelines permit private use.

MY CONTRIBUTION

I adhere to the Company's rules and exercise care when handling Company assets.

EXAMPLE

High-end software is installed on your business laptop. A friend who knows this asks you to lend them your laptop so that they can use one of these programs for private purposes.

You say no, because you know that Company property and Company IT may not be made available to third parties.

2.3 Security and protection of information, know-how and intellectual property

We protect information and intellectual property

CORPORATE PRINCIPLE

We are aware of the value of Company know-how and take great care to protect it. We respect the intellectual property of competitors, business partners and other third parties.

MY CONTRIBUTION

I handle all Company information carefully and do not disclose it to unauthorized persons. I take particular care with regard to information relating to technical know-how, patents, and trade and business secrets.

EXAMPLE

You are involved in the development of an innovative technology. You are to present your development at various Company sites and want to take your laptop, which you have used to store the relevant documents, with you for presentation purposes. You intend to go over these documents again on the plane or the train on the way to the various sites.

You must make sure that no one obtains knowledge of sensitive information belonging to the Group, as this could lead to serious competitive disadvantages. Do not retrieve this type of information in places where third parties can access it or take note of it.



WE ARE RESPONSIBLE PARTNERS

Trust is our greatest asset. That is why we rely on honest, reliable, transparent, and fair business relationships.



3.1 Conflicts of interest
3.2 Benefits
3.3 Prohibition of corruption
3.4 Prohibition of insider trading
3.5 Prohibition of money laundering and terrorism financing
3.6 Fair and free competition
3.7 Business partners, procurement and sales
3.8 Accounting and financial reporting
3.9 Export control

3.1 Conflicts of interest

We take decisions based on facts, thus avoiding conflicts of interest



CORPORATE PRINCIPLE

We act with integrity. That is why it is especially important for us to avoid creating potential conflicts of interest when performing our job responsibilities and to recognize and disclose possible conflicts that we face or that we observe. A potential conflict of interest already exists if private or personal financial interests of employees influence or could influence their business decisions.

Conflicts of interest may arise both from employees themselves or through persons related to them, in particular as a result of involvement in other companies, through secondary employment, in connection with memberships or with regard to employees' personal financial circumstances. In this context, business relations with third parties, such as other companies in the Group or suppliers, may also be relevant.

MY CONTRIBUTION

If I identify that I face or suspect that I may face a potential conflict of interest, I immediately notify my supervisor and the relevant HR and Compliance departments and disclose the facts. If a conflict exists, we jointly seek a solution that safeguards the interests of the Company.

EXAMPLE

Your boss asks you to review offers from several suppliers of plastic components and to pre-select potential candidates. You discover that one of the most favorable bids is from the company of a good friend.

Inform your supervisor of this personal connection that could be understood as personal bias. Withdraw from the decision-making process to avoid any appearance of a conflict of interest.

3.2 Benefits

We carefully check all Benefits

CORPORATE PRINCIPLE

Our products and services define who we are. Therefore, benefits in the form of gifts and invitations are only permitted if they are appropriate.

Our internal policies on handling gifts, invitations and business meals set out what benefits are appropriate and what steps must be taken when accepting and / or granting them.

MY CONTRIBUTION

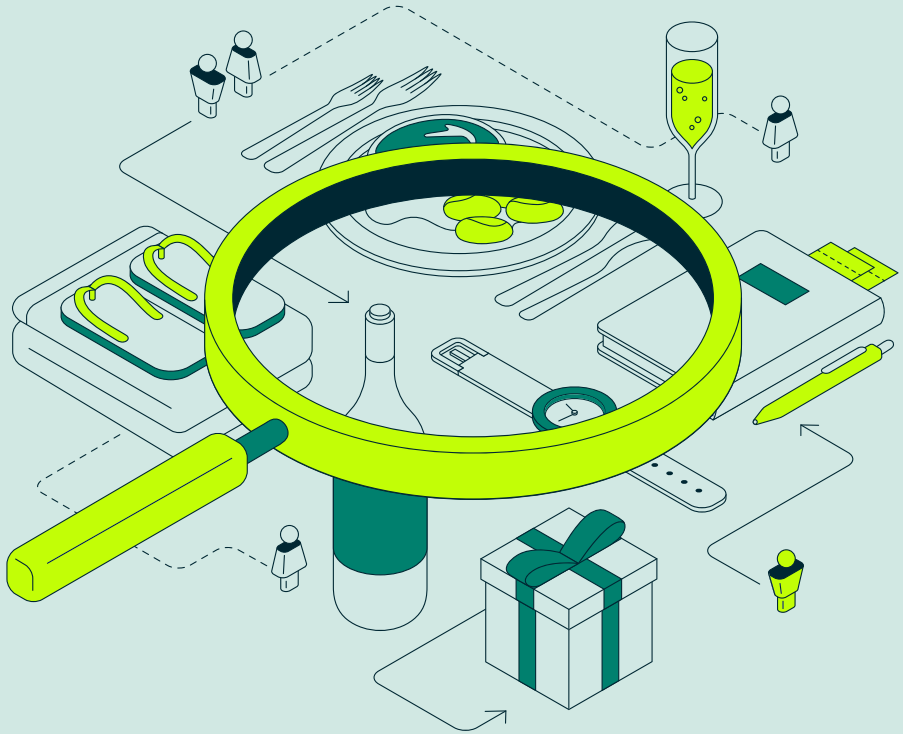
I familiarize myself with the policies on handling gifts, invitations and business meals, and strictly abide by them.

I check whether my behavior is appropriate and whether it might influence my business decisions.

EXAMPLE

You work in purchasing. A supplier sends you an invitation to a multi-day sports event. This supplier is one of the bidders in a current call for tender.

Invitations and gifts from suppliers to purchasing employees must always be scrutinized very carefully. During a call for tenders in particular, the acceptance of benefits from participants is not permitted, as this could give the impression of undue influence. If you have any concerns, contact your supervisor and if necessary the relevant Compliance department.



3.3 Prohibition of corruption

We do not bribe others and do not accept bribes ourselves

CORPORATE PRINCIPLE

Corruption is prohibited worldwide. Corruption means that someone abuses their professional position to gain an advantage for themself or a third party and thereby harm others.

Benefits such as invitations and gifts, especially when dealing with public officials, can be evidence of corruption. Therefore, benefits should be exceptions in business transactions. Benefits may only be granted or accepted within the framework of internal policies and applicable laws.

MY CONTRIBUTION

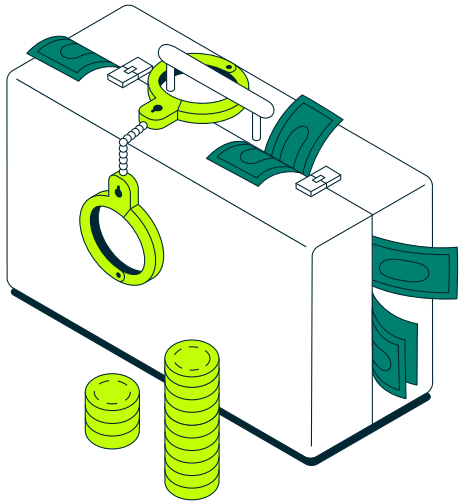
I do not bribe others and I do not accept a bribe myself, and I avoid even the appearance of improper influence. I keep myself informed by consulting the internal rules before I give or accept gifts and issue or accept invitations.

If I receive any corruption-related hints, I immediately inform one of the contacts listed in the chapter on “Support”.

EXAMPLE

You visit a supplier to inspect components for local production. During your visit it becomes obvious that the components have significant defects. Your contact at the supplier offers you a sum of money for ignoring the defects and to persuade you to accept the defective items.

On no account accept the money. Contact your supervisor or the relevant Compliance department immediately. Any attempt at bribery is not tolerated under any circumstances.



3.4 Prohibition of insider trading

We do not share insider knowledge

CORPORATE PRINCIPLE

We handle information pertaining to share Company performance in accordance with capital market requirements and do not tolerate any insider trading. Insider information is information of a precise nature that has not been made public and that, if it were made public, would be likely to have a significant effect on the price of the relevant financial instrument, e.g., stocks and shares. We may only use knowledge relating to insider-relevant projects and processes internally in accordance with the applicable internal policies and may not divulge such knowledge to any outside party, including family members, e.g., a spouse.

MY CONTRIBUTION

I do not engage in insider trading, nor do I make any such recommendations to any third party or induce any third party to engage in insider trading. Furthermore, I do not divulge inside information unless this is required during the course of my normal work, and I comply with the relevant internal policies. I undertake to familiarize myself with the applicable internal rules.

If I have access to inside information, I do not purchase or sell any financial instruments based on this information. This applies not only to trading with shares of listed companies belonging to the Group or derivatives thereof, but also to trading with financial instruments in general, i.e., also those of suppliers.

EXAMPLE

You learn through your work that the acquisition of a large company well-known worldwide is going to be announced soon. As part of your job, you have been informed that the Company’s share price will rise significantly once this transaction has been announced. You know that a good friend is currently considering whether to sell their shares in our Company. You consider telling your friend that he should hold off on selling his shares.

Do not tip your friend off for any reasons whatsoever. Since the information of which you are aware is not public, but insider knowledge, you are not permitted under any circumstances to share this knowledge with others. Transmitting this knowledge directly or indirectly would make you liable to prosecution.

3.5 Prohibition of money laundering and terrorism financing

We are committed to clean business practices

CORPORATE PRINCIPLE

Money laundering occurs when funds or other assets originating directly or indirectly from criminal offenses are put into circulation in the legal economy, making their source appear legal. Terrorism financing occurs when money or other resources are made available to commit criminal acts of terrorism or to support terrorist organizations. Liability does not require the person involved to be aware that money is being laundered through the relevant transaction. Inadvertent involvement in money laundering may already be a criminal offense for the parties involved.

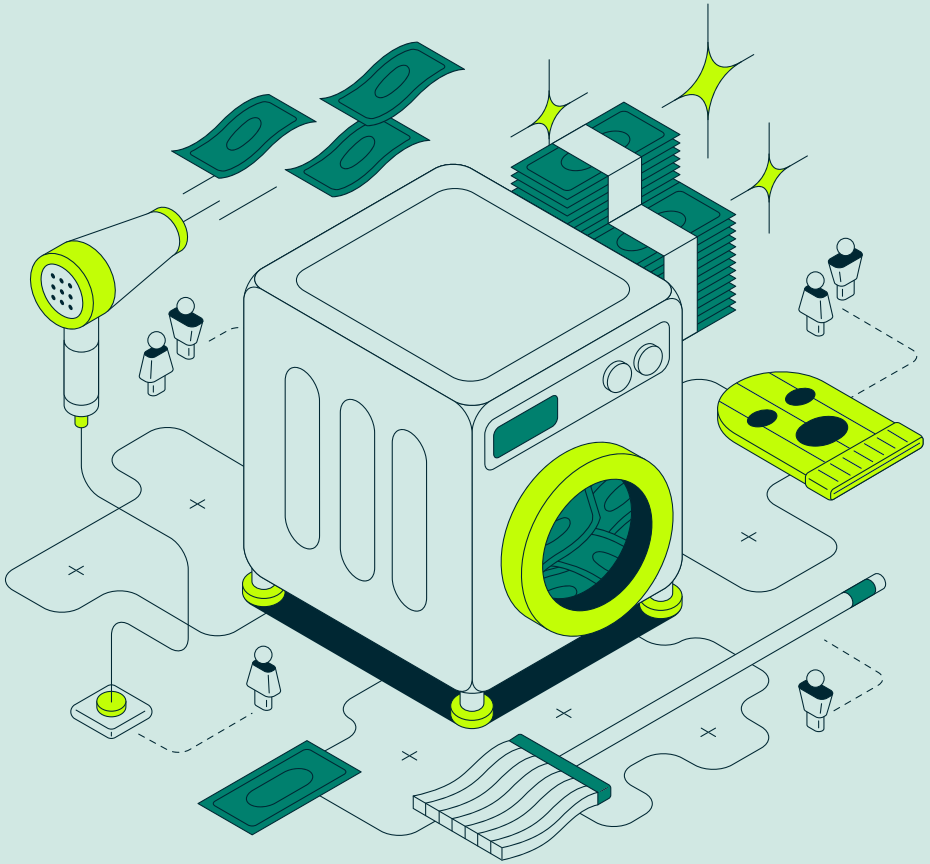
We carefully check the identity of customers, business partners and other third parties with whom we wish to do business. It is our declared aim to conduct business solely with reputable partners who operate in line with legal provisions and who use resources from legitimate sources.

We assign incoming payments to the corresponding services without delay and post them accordingly. We ensure transparent and open cash flows.

MY CONTRIBUTION

I take no action whatsoever that may violate money laundering provisions at home or abroad. I am vigilant and immediately assess any suspicious conduct on the part of customers, business partners and other third parties. If there is information providing sufficient grounds for suspicion, I immediately get in touch with the contact person responsible for money laundering prevention.

I abide by all applicable provisions for recording and posting transactions and contracts within my area of responsibility in the accounting system.



EXAMPLE

A customer or business partner has overpaid and asks for the excess amount to be repaid by transferring it to a foreign account held in another country or by paying it in cash instead of via bank transfer to the original business account.

This kind of request requires an explanation. Do not accept the suggestion readily but ask the customer why the amount cannot be repaid through the same channel used for the original payment. Seek advice from the contact person responsible for money laundering prevention.

3.6 Fair and free competition

We are committed to fair and free competition

CORPORATE PRINCIPLE

Free and fair competition is protected by antitrust legislation valid throughout the world. Complying with this legislation ensures that there is no undue distortion of competition in the relevant markets – to the benefit of all market players.

In particular, agreements and concerted practices between competitors intended to achieve or effect the prevention or restriction of free competition are prohibited.

This includes in particular exchanges on prices and price components, terms and conditions, carving up customer groupings and territories, and restrictions on innovations. In addition, the exchange of competitively sensitive information is prohibited. The abuse of a dominant market position is also prohibited. Furthermore, the proper implementation of merger control procedures is required with regard to cooperations and transactions.

Anti-competitive conduct has the potential not only to significantly damage the good reputation of the Company, but can also incur severe fines, penalties, and financial compensation for damages.

We conduct business solely on the basis of merit and market economy principles as well as free and open competition. We like to measure ourselves against our competitors, always abiding by laws and regulations and observing ethical principles.

We do not enter into any anti-competitive agreements with competitors, suppliers, or customers. If our Company holds a dominant market position, we do not abuse this position.

We comply with the specific antitrust provisions for distribution systems in our dealings with our authorized distribution partners.

MY CONTRIBUTION

Whenever I come into contact with competitors, I make sure that no information is given or received that would allow conclusions to be drawn about current or future business conduct.

In discussions or any other contacts with competitors, I avoid issues that could be of relevance for competition among each other.



EXAMPLE

You meet with competitors' employees at a trade conference. You exchange ideas with them. Make very sure you do not betray any trade secrets – especially information with details that could impact free and fair competition. Such information includes the pricing of products and services, pay or strategic details.

3.7 Business partners, procurement and sales

We carefully check who we do business with

CORPORATE PRINCIPLE

We carefully select suppliers, service providers and partner companies based on objective criteria and make use of competition. We only cooperate with business partners in line with statutory requirements, internal rules and guidelines.

We check the integrity of potential business partners carefully before entering into business relations and follow the processes and contact procedures set out in the rules and policies.

When purchasing or selling products and services, we involve the relevant departments in the process in good time in accordance with the applicable policies.

MY CONTRIBUTION

I make myself familiar, that the integrity of potential business partners has been checked before entering into business relations and follow the processes and contact procedures set out in the rules and policies. I show no bias in favor of a supplier, service provider or partner company without an objective reason, and I promote competition.

I do not purchase any products or services without having first gathered information on the market and alternative suppliers. I follow the applicable procurement guidelines and involve the relevant purchasing department at an early stage before the planned delivery and performance of services in line with valid purchasing processes.

I make sure that remuneration is only paid for services that are actually rendered and that the payments are commensurate with the services rendered.

I also comply with the relevant policies before commissioning Group companies.

EXAMPLE

It comes to your attention that a supplier, service provider or partner company is to be commissioned without involving the relevant purchasing department.

Get in touch with the relevant purchasing department or one of the contacts listed in the chapter on "Support", to make sure the bid that is most cost-effective for the Company is given consideration.

3.8 Accounting and financial reporting

We are committed to correct financial accounting and reporting

CORPORATE PRINCIPLE

We strictly comply with the statutory provisions for proper accounting and financial reporting. Transparency and correctness are our top priorities, because any irregularities may have serious consequences for the Company as well as for the persons responsible. To that end, we regularly inform all capital market players of our financial position and business developments. We publish our periodic financial statements punctually in accordance with national and international accounting regulations.

MY CONTRIBUTION

I organize processes in such a manner as to ensure all business financial data are entered correctly and promptly in the accounting system. If I have any questions about the correct recording of data, I contact my supervisor or the appropriate finance department.

EXAMPLE

You urgently need new equipment. However, your department's budget for the current fiscal year has already been used up. You consider acquiring the equipment nevertheless and posting the cost in the next fiscal year when your budget has been refreshed.

Do not take any action of the kind. Entries must always be assigned correctly. Posting entries inaccurately may have serious consequences for the Company and the individual employee.

3.9 Export control

We ensure compliance with all regulations in cross-border trade



CORPORATE PRINCIPLE

We are aware of our social responsibility to fulfill export control and sanctions obligations and expressly commit to complying with the relevant legislation.

Cross-border business processes and transactions may be subject to prohibitions, restrictions, approval requirements or other supervisory measures under export control regulations. These may relate to the relevant business partners, goods, countries, financial resources, or intended use. This applies to technologies and software as well as goods and products. In addition, it applies to temporary cross-border transfer and technical transmissions, for example, by e-mail or cloud. Furthermore, certain imports may be subject to export control regulations.

We ensure compliance with applicable export control regulations and the relevant internal policies.

MY CONTRIBUTION

I am responsible for regularly checking that I am familiar with internal information and policies on export control. That is how I keep up to date on whether my day-to-day work is subject to export control regulations.

Should I become aware that export control regulations are being violated in my area of responsibility, I immediately take every possible action to prevent or remedy such violations.

If in doubt, I seek advice from the relevant export control contact.

EXAMPLE

You commission a long-standing partner company with the development of a software component. To offset cost pressure the partner suggests commissioning a subsidiary outside the EU with some of the development activities. The subsidiary is based in a country that is on country list A defined by the Groups export control unit.

There may be embargo regulations prohibiting certain activities in the country. This must be coordinated both internally and with the export control authorities before you can agree.

Contact the relevant export control unit to coordinate the next steps.

WE ARE GOOD CORPORATE CITIZENS

We bear responsibility for society and ensure that our Company contributes to sustainable development.



4.1 Communication and marketing
4.2 Political lobbying
4.3 Dealings with public officials
4.4 Donations and social sponsorship
4.5 Taxes and customs
4.6 Data protection
4.7 IT security
4.8 Product Compliance
4.9 Environmental protection

4.1 Communication and marketing

We communicate clearly and respectfully

CORPORATE PRINCIPLE

We ensure that our communication is clear and consistent in order to maintain the confidence of customers, investors and other stakeholders. Before committing to and / or executing any communication or marketing measures, such measures must first be coordinated with the relevant department. Thoughtfulness and respectful interaction with one another are second nature to us.

MY CONTRIBUTION

I do not issue any public statement on behalf of my Company and always refer any requests to the Communications department. If I make any comments at public, trade or cultural events or on the internet, I make it clear that I am voicing solely my own personal opinion. I consult the Company's social media guidelines for advice on proper conduct in social networks.

EXAMPLE

You read comments on the internet from someone criticizing production methods in Asia and you know the comments are completely unfounded.

Even if you would like to put the facts right straight away, contact the relevant department first, because they are in a position to respond comprehensively and appropriately to these comments.

4.2 Political lobbying

We represent our Company's positions in a responsible and clear way

CORPORATE PRINCIPLE

As a member of society, we can specifically promote the Company's positions during decision-making processes, such as those for legislation plans through political lobbying. We conduct political lobbying centrally and in line with the principles of openness, accountability, and responsibility. It goes without saying that our interaction with political parties and interest groups is based on the principle of neutrality. Undue influence in politics or legislation is not permitted.

MY CONTRIBUTION

I do not attempt to intervene in political decisions on behalf of the Company if I am not authorized to do so. If I am authorized to do so, I observe the relevant internal policies in the performance of my duties.

EXAMPLE

You have a relative who works for the transport ministry and who asks for your opinion on draft legislation that will impact the automotive industry. They also ask you for the Group's position on this legislation.

Do not comment. Political lobbying in the Company is exclusively coordinated centrally and conducted openly and transparently. The authorized contact for such lobbying activities is the External Relations department.

4.3 Dealings with public officials

We exercise caution when dealing with public officials

CORPORATE PRINCIPLE

In view of national and international legislation, there is an increased risk of corruption when dealing with public officials. This is taken into account in our internal policies, which lay down the framework with regard to benefits. In particular, we do not make any facilitation or expediting payments, i.e., payments to public officials that facilitate or expedite regular or routine official acts.

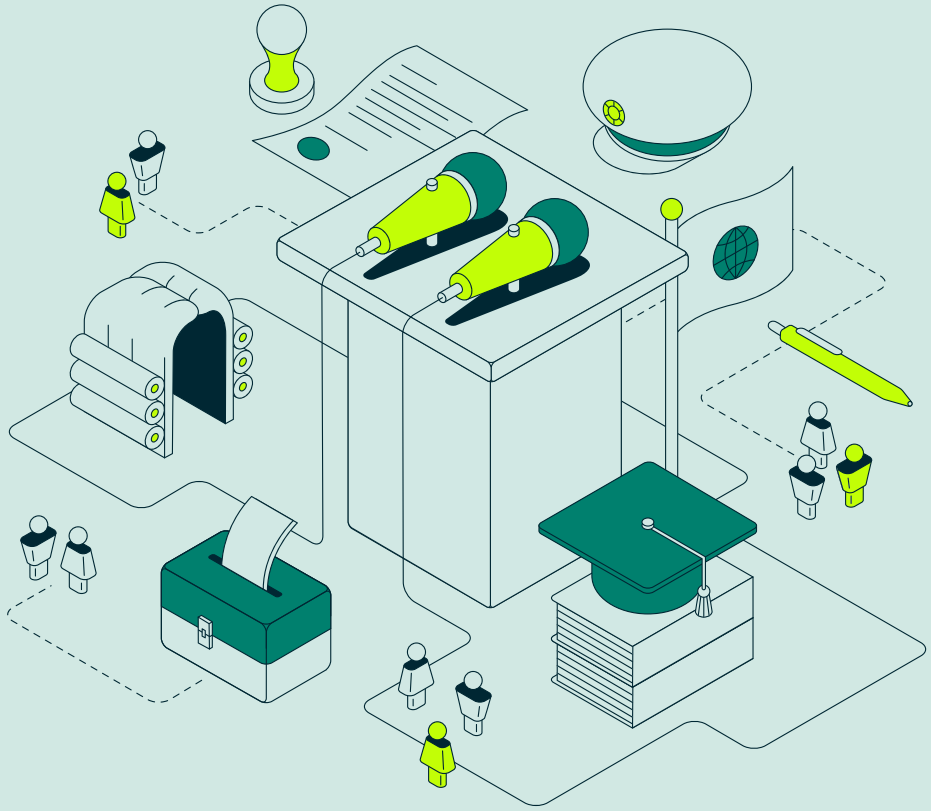
MY CONTRIBUTION

I am aware that there is an increased risk of corruption when dealing with public officials. Therefore, I familiarize myself with the applicable special rules. I understand that I have a binding obligation to consult the Compliance department in this regard.

EXAMPLE

The guests invited to a full-day event include a university professor, who has been asked to give a lecture. You are considering what you need to keep in mind. Among other things, your department would like to invite the guests to lunch.

Because the rules governing dealings with public officials – this also includes academic staff at state universities – are especially strict, seek the advice of the relevant Compliance department in advance.



4.4 Donations and social sponsorship

We commit to society in many ways

CORPORATE PRINCIPLE

We make donations, i.e., voluntary contributions without a return service by the recipient, and grant sponsorships, i.e., contributions based on a contractually agreed return service for social objectives, to achieve a positive impact in terms of our reputation and public perception. In order to avoid conflicts of interest and to ensure standard conduct within the Company, donations and sponsorship measures are permitted only in the context of the respective legal framework and in accordance with the applicable internal rules of the Group brands and companies.

Donations and sponsorship measures are only granted in accordance with a transparent approval process. We grant payments and / or non-cash benefits for scientific, charitable, cultural or religious purposes.
In addition, we grant donations exclusively to institutions which are recognized as charitable and / or tax-privileged.

MY CONTRIBUTION

If I consider a particular sponsorship measure to be worthy of support, I make initial contact with the appropriate departments in the Company, e.g., Communications, External Relations, and Human Resources.

The granting of donations must be transparent, i.e., the purpose, the recipient of the donation, and the financial management must be documented and verifiable.
I comply with internal processes and general conditions and do not initiate any donation that could damage the reputation of our Company.

EXAMPLE

A local politician asks you for a cash donation from your Company for the election campaign.

Turn down the request. Donations may only be granted after going through the required approval process. In this specific case, the donation cannot be approved because an internal guideline prohibits donations to political parties, related institutions, and politicians.

4.5 Taxes and customs

We meticulously observe tax and customs regulations

CORPORATE PRINCIPLE

As a global company, we are aware of our social responsibility to meet our obligations with regard to foreign trade, taxes and customs, and we explicitly endorse compliance with national and international legislation.

MY CONTRIBUTION

I design internal structures and processes in such a manner as to ensure that the taxes and customs to be paid by the respective Group companies are calculated correctly, promptly and in full, are disclosed in reporting, and are paid to the relevant fiscal authorities.

If I have information concerning a violation of tax and customs regulations in my area of responsibility, I undertake every action I can to prevent or stop this violation. If that is not possible, I get in touch with the appropriate contact person in the tax and customs department.

EXAMPLE

You are responsible for posting certain business transactions, for example general overheads such as maintenance expenses, and production costs, in the statutory financial statements. One project exceeds certain controlling parameters early in the financial year. You therefore receive instructions to make an entry under maintenance expenses even though the transaction unquestionably relates to an investment and must therefore be treated as capitalized production costs.

Post the entry in line with legal requirements. All business transactions must be correctly reported pursuant to commercial law and tax regulations because these accounting records form the basis for tax returns. Accounting errors could therefore result in incorrect tax returns and lead to serious consequences under tax and customs law for the Company and the employees responsible.

4.6 Data protection

We handle data carefully



CORPORATE PRINCIPLE

We attach great importance to handling data responsibly, securely and transparently. We collect, process, use, and store personal data solely in accordance with statutory requirements. We protect the personal data of customers, employees – including former employees and applicants – and partners such as suppliers and development partners.

MY CONTRIBUTION

I handle personal data confidentially and my actions are clear and transparent. I integrate data protection in my actions and processes and ensure the security of all data in my area of responsibility. I take responsibility and pay attention to secure data exchange throughout the value chain. If in doubt, I contact my supervisor or the relevant data protection department.

EXAMPLE

You are planning a market analysis for the Company. The analysis involves the collection and evaluation of customers' personal data. Another department would also like to use this data at a later point. Valid data protection legislation states that data may only be collected and processed on a specific legal basis and that the customers concerned must always be adequately informed. In addition, as a general principle data may only be processed for the purpose for which it was collected.

Please clarify with your supervisor or the relevant data protection unit whether the customers' consent must be obtained prior to collection, how the customers are to be informed, and the terms on which the data could be used by another department.

4.7 IT security

We secure our IT systems

CORPORATE PRINCIPLE

We respect IT security and abide by the applicable information security regulations. The information security regulations provide guidelines for different employment groups and are relevant for all employees.

MY CONTRIBUTION

I familiarize myself with the applicable IT security regulations and observe the rules therein. As part of the IT security chain, I make my active contribution by being vigilant at all times and ensuring my basic IT security skills are always up-to-date.

EXAMPLE

You are on a business trip. The SIM card you have been given by your company has no reception, but you need to send a confidential document to your supervisor. The café you are sitting in offers free, unencrypted Wi-Fi.

Be very careful when you use public Wi-Fi. There is data leak risk when using unprotected connections, even though our data transmissions are protected via VPN, a virtual private network.

4.8 Product Compliance

We inspire the world with our products

CORPORATE PRINCIPLE

Our products inspire countless people all over the world. We give high priority to the conformity and safety of our products. We have a responsibility to ensure that risks to health, safety, the environment, and the assets of our customers or third parties resulting from the use of these products are excluded where possible.

In compliance with statutory provisions, we develop our products in accordance with state-of-the-art technology, taking account of other binding obligations such as additional safety requirements resulting from the state of scientific knowledge. This is systematically ensured by means of established structures and stable processes. Once they have been put on the market, our products are constantly monitored in the field so that appropriate measures may be promptly initiated in the event of possible discrepancies. We do not make any compromises in this regard.

MY CONTRIBUTION

I carefully comply with all relevant provisions in my day-to-day work. I set realistic goals. If there is a conflict of goals, the conformity of our products always has top priority, regardless of time or cost pressure. That is why I embrace our defined processes and continuously improve them. We jointly identify and close gaps in processes in order to meet all binding obligations. I contact my supervisor or the PCMS team if I have any questions or concerns about product compliance.

EXAMPLE

A customer reports that the operating system in their vehicle has crashed. You are not sure whether this is due to an operating error on the part of the customer or a software malfunction.

Follow the applicable processes and report the problem immediately to the employees in charge so that the issue can be clarified and in order to initiate the steps that may be necessary based on the known facts.

4.9 Environmental protection

We bear responsibility for the environment and sustainability



CORPORATE PRINCIPLE

As a global commercial enterprise, we bear responsibility for the environmental compatibility and sustainability of our products, locations, and services. Our Company aspires to be a global provider of sustainable mobility and a role model for protecting the environment. We focus on environmentally friendly, advanced, and efficient technologies, which we implement throughout the entire lifecycle of our products. From the very early phases of development and production onward, we make sure we manage natural resources carefully, continuously reduce the environmental impact, and comply with environmental protection laws and regulations.

Furthermore, we constantly reassess the environmental compatibility of products and manufacturing processes, optimizing these where necessary. We are a responsible member of society and a partner for politics. We seek a dialog with these players on future mobility concepts and on shaping ecologically sustainable development.

MY CONTRIBUTION

I am mindful of environmental protection in my work and use resources and energy economically and efficiently. I make sure my activities have the smallest possible impact on the environment and that they comply with environmental protection laws and regulations.

EXAMPLE

You notice that a tank in one of the halls is leaking and that large quantities of fluid used in the production process are spilling onto the floor. No one else seems to have noticed the leak and you are concerned that the entire tank could drain off.

Inform one of the employees in charge immediately and draw attention to the problem. Do not count on anyone else reporting the leak.

SUPPORT

We offer support in dealing with the Code of Conduct.

PREVENTING MISCONDUCT, CONTACT POINTS AND WHISTLEBLOWER SYSTEM

Our Code of Conduct provides the binding framework for acting with integrity and in compliance with the rules within our Group. As Group employees, we have a responsibility to respect the principles of our Code in order to prevent Regulatory Violations and thus avoid damage to the Company. Violations of laws and internal policies are immediately investigated. Depending on the seriousness of the violation, this can have disciplinary, civil, or criminal consequences for the employees concerned. Proven misconduct can also have an impact on remuneration. That is why we talk to our supervisor or seek expert advice immediately if we have any questions or concerns, or if we suspect there has been a violation of internal or external regulations. The HR department and employee representatives are there to provide support. We can also contact the Company's Compliance Officer or the Compliance advice service at any time at:

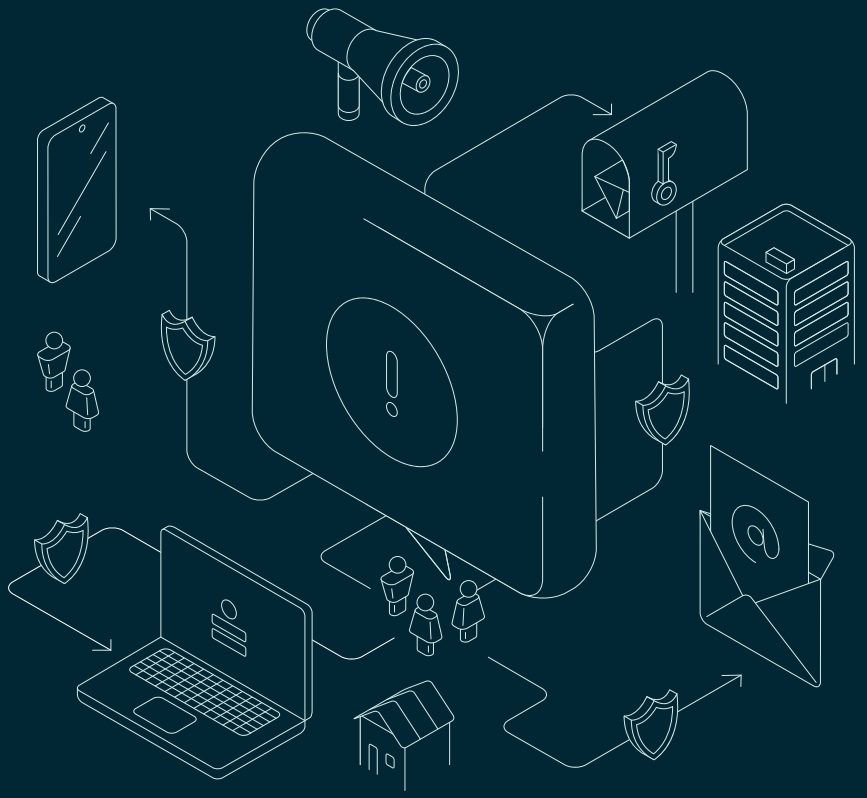
E-mail: grc@elli.eco

In addition, we can submit reports regarding Regulatory Violations via the Volkswagen Group Whistleblower System. We can give our name, or we can make the report anonymously. We are aware that the Volkswagen Group Whistleblower System has responsibility for investigating reports regarding Serious Regulatory Violations.

A Serious Regulatory Violation is a significant violation of our ethical values as set out in the Code of Conduct. Equally, violations of statutory laws or regulations that may significantly affect the reputation or financial interests of the Company are also considered to be Serious Regulatory Violations. In all other cases we should first seek advice from our supervisor, the HR department or Compliance.

Managers have a special function as role models. The decisions they make for the Company must always take account of values and regulations.

The purpose of the Whistleblower System is to protect our Company, the whistleblower, and all persons who contribute to the investigation and the termination of misconduct. Discrimination against them is itself considered a Serious Regulatory Violation.



At the same time, the Whistleblower System protects the interests of Persons Implicated. For them, the presumption of innocence applies as long as a violation is not proven. The work of the Whistleblower System is based on uniform processes and the confidential, professional processing of reports. Abuse of the Whistleblower System is not tolerated and will be disciplined accordingly.

Potential violations of the Code of Conduct for Business Partners, including serious risks, violations of human rights and environmental violations by direct and indirect suppliers, can also be reported to the Central Investigation Office.

We can access the Whistleblower System through the following channels:

Contact details for the Investigation Office:

E-mail: io@volkswagen.de

Postal address: Central Investigation Office
Box 1717
Berliner Ring 2
38436 Wolfsburg, Germany

In person: Please make an appointment in advance by writing an e-mail to io@volkswagen.de

Online reporting channel: https://goto.speakup.report/volkswagen

You can submit your report in over 65 languages (also anonymously) via a web-based reporting channel.

Voice intake by phone:

Dial the phone number for the country that you are located in (Germany: 0800 1818 952) and enter the organizational code 122203. The Investigation Office will receive a transcript of your voice recording. Please find a list with relevant telephone numbers on our website.

SpeakUp App:

Scan the QR code and download the app "SpeakUp / Listen for a change" by People Intouch (personal devices only). Enter the organizational code 122203, then speak or type your message for us.

Contact details for the ombudspersons:

Internet: https://www.ombudsmen-of-volkswagen.com

Experienced external lawyers act as neutral mediators (ombudspersons) for us. As legal counsel, they are tasked with receiving reports about possible infringements of laws, internal rules or other conduct damaging to the Volkswagen Group.

Further information on the Volkswagen Group Whistleblower System, the relevant external reporting channel (if applicable) as well as the respective phone numbers for voice intake and all relevant organizational codes is available on the internet at https://www.volkswagen-group.com/en/our-whistleblower-system-16041 .

SELF-TEST FOR DECISION GUIDANCE

If at any time I am unsure whether my behavior complies with the principles set out in our Code of Conduct, I should ask myself the following questions:



1. **Did I take all relevant matters into consideration and weigh them properly?** (content test)
2. **Am I confident that my decision is within the constraints of legal and company requirements?** (legality test)
3. **Do I stand by my decision when it is revealed?** (supervisor test)
4. **Am I in favor of all such cases being decided the same way company-wide?** (universality test)
5. **Do I still think my decision is right when my company has to justify it in public?** (public test)
6. **Would I accept my own decision if I were affected?** (involvement test)
7. **What would my family say about my decision?** (second opinion)

If my answer to questions 1– 6 is "yes" and the answer to question 7 is positive, my behavior is very likely to be compliant with our principles. If questions remain unanswered or if I have any doubts, I should get in touch with any of the points of contact listed in this chapter.

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