



tCMS awareness package for our Bodybuilders

Stuttgart, July 2023

Mercedes-Benz



Purpose of this document



Review the **introduction** to Mercedes-Benz's **current technical Compliance efforts**



Reflect upon the **implication for your own business with us**



Decide upon **technical Compliance responsible persons** in your organization



Reach out to us via **tcms-bb-portal-vans.support@mercedes-benz.com** in case of clarification needs

This document includes information material and contact options

1

Introduction

- **What** is technical Compliance for Mercedes-Benz and **why** did we implement a technical Compliance Management System?

2

What we expect from you

- What does Mercedes-Benz **expect** from its business partners with regard to technical Compliance?

3

What we offer to you

- **What** does Mercedes-Benz **offer** to its business partners to **support** a joint effort for technical Compliance?

4

How do we want to work together

- Exchange with a Mercedes-Benz contact person in case of **clarification needs**.

Compliance is important to us

“ *Our sustainable business strategy is based on integrity and compliance. Shared values also form the basis for successful partnerships.* ”

Renata Jungo Brüngger

Member of the Board of Management of Mercedes-Benz Group AG, Head of Integrity and Legal Affairs



Technical Compliance and tCMS – What does this mean?



Technical Compliance

Adhering to **technical regulations, standards and laws**

Complying with **internal development guidelines and processes**

Taking into account the **fundamental spirit of laws and regulations**



technical Compliance Management System (tCMS)

Safeguards **legal and regulatory conformity** within the product creation phase

Provides **orientation and guidance** to our **employees** through **values, principles, structures and processes**

Technical Compliance is aligned with Mercedes-Benz's values and shapes business partner relations



Why



- **Integrity and Compliance** belong to Mercedes-Benz's core values and principles
- This includes adhering to **technical regulations, standards and laws**, taking the **fundamental spirit** of these into account

How



- Informing about **technical Compliance** requirements, including **consultation points**

What



A **technical Compliance Management System** at **Mercedes-Benz**

- safeguards and verifies **legal** and **regulatory conformity** during the product creation phase
- establishes standards on technical Compliance with **business partners**

Who



- **Mercedes-Benz departments** as well as **external business partners** in **Research & Development**

We expect from our business partners integrity and responsibility in technical compliance efforts

We expect from
you as our
business partner
that ...



... all your products and services adhere to the **regulatory requirements** and **are developed** according to the **current state of science and technology**.



... all **customized vehicles** in a specific market **fully comply** to **all relevant laws and regulations** and to the **certification/homologation documents** as approved by authorities.



... you follow our **bodybuilder guidelines**. In case of further questions, **regarding technical interpretation**, which can't be answered with the bodybuilder guidelines, please reach to your contact at Mercedes-Benz.



... **documentation requirements** are fulfilled as **required by law**. This ensures **completeness and correctness**.

... **software licenses** that are used (**especially Free and Open Source Software FOSS**) are **completely documented, disclosed and aligned**.

... you **document** all safety, regulatory conformity or emission-relevant topics, as well as cyber security risks in the **objective and transparent way**.



... a **dedicated contact person** for **questions regarding technical regulatory conformity** is available for your employees as well as external parties, e.g. Mercedes-Benz employees. This person should not be involved in the development process.

... you **create awareness within your organization** regarding **potential technical Compliance risks**, and how that can **impact safety, regulatory conformity, emissions** and **cyber security**.

We recommend
that ...

We offer our business partners various dialogue options and transparency

We offer you
as our
business
partner ...



Dialogue

... the possibility to **reach out to us via tcms-bb-portal-vans.support@mercedes-benz.com** in development etc. at any time.



Open Ear Channel

... contact points for **anonymous and confidential allegations**, e.g. allegations or violations of laws and regulations: You can reach out **to our whistleblower system or our neutral intermediary (external lawyer)**.



Consultation

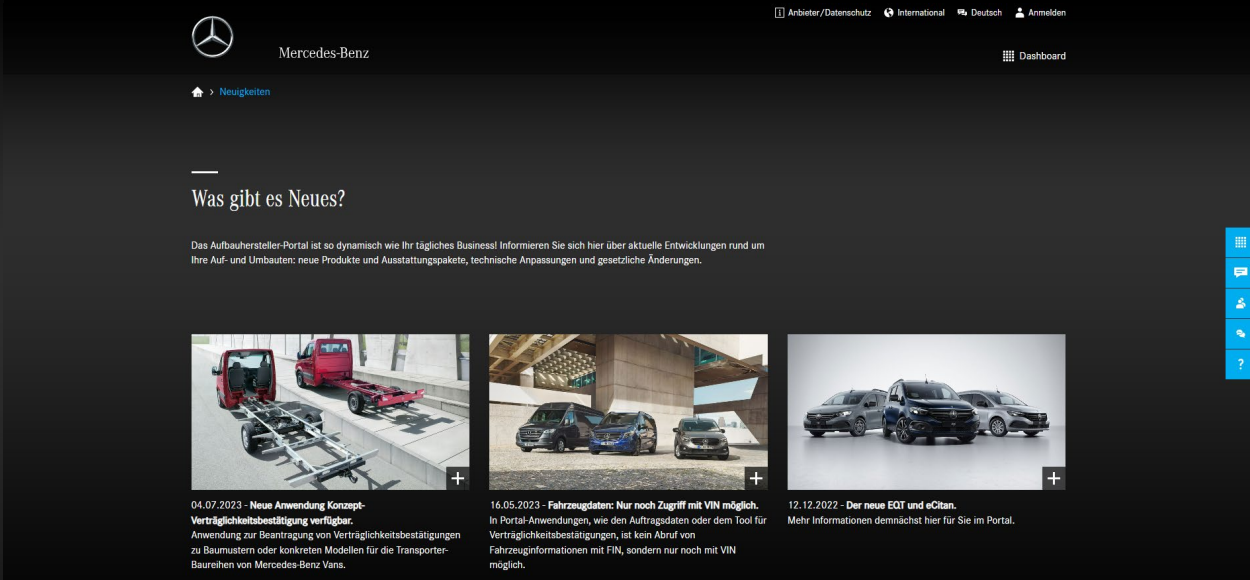
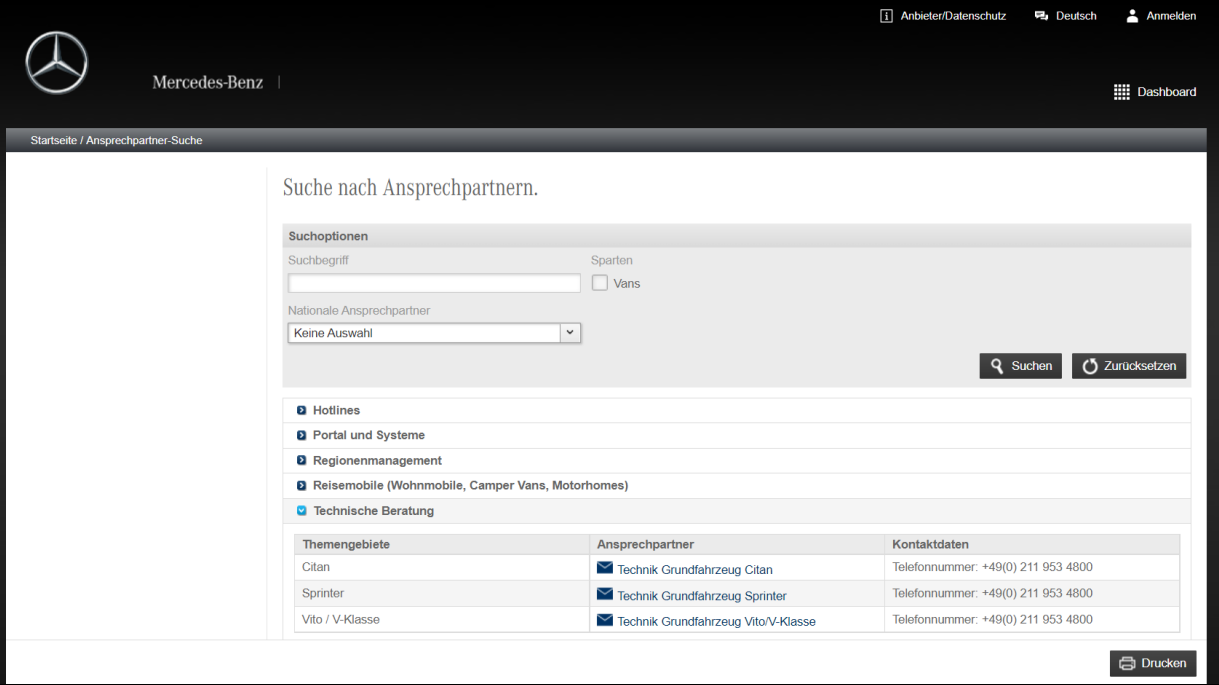
... **trained consultation points** for **clarification of questions** regarding technical regulatory conformity, unclear specifications as well as other compliance questions.



Information

... **various information sources** regarding technical Compliance issues.

Information platform for Bodybuilders

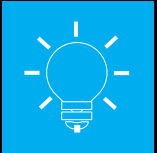


If you have any questions or want to find out more, you can register on our [Bodybuilder-portal](https://bb-portal.mercedes-benz-vans.com/de/GLOBAL). There you will find information material and contacts. Please find attached the link:
<https://bb-portal.mercedes-benz-vans.com/de/GLOBAL>

Here you can also subscribe to our newsletter so that you always have the latest information.

We want to enhance collaboration with our partners through close contact

This means for you as our business partner ...



Critical issues have to be raised. This also implies – if necessary – uncomfortable discussions.



Information and consultation points need to be put in place. They are used to clarify uncertainties and to approach risks well in advance.



Become an ambassador for technical Compliance in your organization.

Purpose

The anchoring of technical Compliance can only succeed if everyone works on it together.





Dedicated contact for Whistleblowing issues

The **Whistleblower System BPO** is an important instrument of good corporate governance. **Employees** and **external parties** can report **concrete indications of suspected misconduct** within the company.

The **BPO** focuses on violations that pose **a high risk to the company and its employees**, for example:

- Corruption, antitrust law and money laundering offenses
- Severe cases of sexual harassment, discrimination and racism
- Violations in connection with engineering specifications and/or technical safety or violations in connection with environmental regulations
- Theft, fraud and undue enrichment offenses of significant scope or amount

Please send tip-offs:

Mercedes-Benz Group AG
Business Practices Office

Email: bpo@mercedes-benz.com

Internet: <https://group.mercedes-benz.com/unternehmen/compliance/bpo/>



Brazil:	0800 033 3391
South Africa:	0800 983 994
Japan:	0120 228 160
USA (East coast):	877 482 5899
USA (West coast):	866 267 4360

BPO Hotlines

Dr. Regina Michalke – attorney at law
Kanzlei HammPartner Rechtsanwälte PartG mbB

Wolfgangstraße 92, 60322 Frankfurt am Main, Germany

Email: regina.michalke@ra-neutralermittler.de | Phone: +49 69 95 91 900

Neutral Intermediary
– for Germany

Our checklist helps you to document potential topics

Purpose

- Decision processes need to be **transparent** when and wherever regulations leave room for interpretation
- SCE*- plus Cyber Security relevant topics should be documented so that an independent third person can quickly understand the topic as well as the decision taken
- All documents need to be prepared and stored properly as most of them **can be relevant documents**
- Our checklist represents a possible approach for you to document potential risks

This means for you

- ✓ Document all relevant facts for the evaluation of the topic and the result
- ✓ Formulate short and clear statements
- ✓ Stick to the facts
- ✓ Avoid speculations, especially when the involved parties are no experts
- ✓ Stick to objective evaluations based on facts and your know-how
- ✓ Choose your words carefully and ensure that the message has a clear meaning, is specific and is written in an appropriate tone
- ✓ Use clear and comprehensive technical vocabulary
- ✓ Point out any risks, in particular do not hide any safety, regulatory conformity or emission relevant topics
- ✓ Create transparency on cyber security risks and threats

*SCE: safety, regulatory conformity, emissions

We look forward to
continuing our successful
collaboration with you!

