



# CODE OF CONDUCT



**SCANIA**



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# 1. FOREWORD

## Dear colleagues,

Scania's success is based on our core values and our management system supported by our main principles, in particular our commitment to continuous improvement. This is the basis of our unique corporate culture and it gives us a strong leadership position in a world increasingly dependent on safe, sustainable and efficient transport systems. We call it "The Scania Way".

Scania's strategic direction is to drive the shift towards a sustainable transport system, creating a world of mobility that is better for business, society and the environment. While the core of our contribution to society is about the transformation of the transport system, it does not mean that our responsibility ends there. For Scania, sustainability is also about how we conduct our business— it is about being responsible and delivering value in our relationships and across our value chain. The more global we become, the more important it is to keep trust, transparency and ethics top of mind.

At Scania we always strive to do the right things in the right way. We act in accordance with our culture, core values and follow all legal and compliance standards. Together with our core values and our leadership principles, this Code of Conduct forms the framework in which we operate.

[Link to Scania Executive Board](#)

This document contains the most important principles which we all have to live up to - the Executive Board as well as all managers and each and every employee. The Code of Conduct supports us in our everyday business by prescribing binding rules and describing how we can deal with challenging situations.

We urge you to read the contents of this document carefully and discuss the examples with your colleagues. By living this Code of Conduct, Scania will stay the strong and transparent company as it is of today.

Should you have any questions or doubts, please do not hesitate to contact the persons listed in chapter 7.

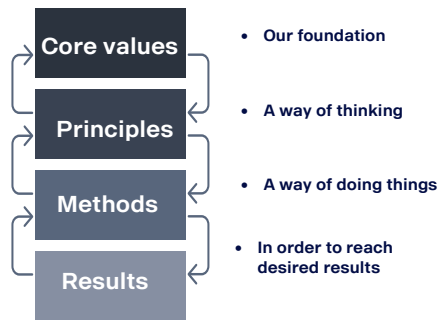
# 2. THE SCANIA WAY

## Our Operational Strategy – The Scania Way

Scania's aim is to drive the shift towards a sustainable transport system, creating a world of mobility that is better for business, society and the environment. Our operational strategy – The Scania Way – describes how we want the Scania organisation and our processes to work and how we want the people to think.

The Scania Way gives us the ability to execute our mission with our sound company culture as its foundation. This foundation is based on our core values and a leadership enabling the dedicated and empowered people of Scania to grow to their full potential.

## THE THINKING MODEL



The Thinking Model helps us connect the core values, the principles and our way of working with the results we get. These connections apply in both directions. Here Leadership comes into play, yielding the way for the dedicated people of Scania, working in cross-functional teams.

An important symbol of The Scania Way is the Scania House. The house has a foundation representing our core values, and a floor, walls, and a roof representing our operational principles.

## THE SCANIA WAY

Leader in sustainable transport



The Scania House together with the Thinking Model form the basis of our corporate culture. This is “The Scania Way”.

## Core values

Our culture is based on our core values: Customer first, Respect, Team spirit, Responsibility, and Elimination of Waste. They guide us in our actions and give us a solid foundation when we develop our business. The core values reflect the stakeholders of the company: customers, employees, owners, and society as a whole. We share the core values with our sister brands in Traton, enabling communication and cooperation within our group.

### Customer first



#### **Our customers are the starting point of everything we do**

We are only successful when our customers are successful, and we cooperate with them to understand their current business.

We provide tailored solutions that deliver value, are sustainable and profitable, today and in the future

### Respect



#### **We respect each individual, their skills and opinions**

We treat others with respect and expect to be treated with respect. We listen and understand. Everyone can contribute and has the potential to grow and learn over time.

Respect is the foundation of all processes, all improvements, and all value creation.

### Team spirit



#### **We all win when we work as a team**

We work as one team towards a common goal, united by a joint purpose.

A team includes everything from the smallest group of colleagues, through each brand, up to the TRATON Group itself and our partners. Together we succeed.

### Responsibility



#### **We take responsibility for society and environment**

We always act with integrity and look beyond our immediate areas of responsibility, considering the long-term impact of our actions.

We take responsibility both as a group and as individuals.

### Elimination of waste



#### **We minimise unnecessary cost by eliminating waste**

With a strong focus on continuous improvements, from strategic step changes to operational every day changes, we ensure high-quality output and efficiency in all areas.

We find and remove all activities that have no value to our end customers and seek to minimise the negative impact of our operations and products



# 3. OUR RESPONSIBILITY FOR COMPLIANCE

One decisive factor for the success of our company is that all employees – from Board members and managers to each individual member of staff – must act with honesty and integrity and in an ethical manner. This also means that our internal and external reporting and communications must be truthful, comprehensive and timely.

Our shared goal is to fulfil our responsibility to our company and to protect the reputation of our brand. Sustainability requires of us an awareness of our responsibility for the economic, social and ecological impact of our actions. Such conduct also means that we all respect and observe the rules in force in the company everywhere and at all times. Our Board members and managers bear a special responsibility in this context: they are role models and must prevent non-compliant behaviour within the company, protect their employees and conduct themselves with integrity both within the company and externally.

This Code of Conduct helps us by highlighting potential areas of risk and conflict, explaining their significance for our company and illustrating those using case studies.

The information contained in this Code of Conduct is divided into three main sections:

- Our responsibility as a member of society
- Our responsibility as a business partner
- Our responsibility in the workplace.

The Code of Conduct serves as a binding guideline in our day-to-day business. It is supplemented by internal guidelines and provisions in employment contracts. It also goes without saying that we all comply with the national and international statutory provisions. This also means that we never take any part in any activity that involves fraud, misappropriation, extortion, theft, embezzlement or any other deliberate damage to the assets of our customers or any third party.

Failure to observe the Code of Conduct can result in considerable damage, not only to our company, but also to us as employees and to our business partners and other stakeholders. That is why the Code of Conduct is binding on all of us, irrespective of whether our role is that of a staff member, a manager or a Board member. We do not tolerate violations of the Code of Conduct. Anyone who violates the Code of Conduct must expect consequences, which, depending on the seriousness of the violation, can range from action under labour law to claims for damages under civil law, and may even extend to penalties under criminal law.

To make sure that does not happen, it is up to each and every one of us to familiarise ourselves with this Code of Conduct, to integrate the Code of Conduct into our own behaviour, and to bear the Code of Conduct in mind when making decisions. When in doubt, we seek competent advice.





## **4. OUR RESPONSIBILITY AS A MEMBER OF SOCIETY**

Our social responsibility means that observing and complying with the law is a matter of course. We have a duty to observe the law under which we operate in all business decisions we make.

Every employee in the Scania Group must be aware of our social responsibility, particularly as regards the wellbeing of people and the environment, and ensure that our company contributes to sustainable development.

Scania's responsibility as a member of society specifically gives rise to the following principles:

# HUMAN RIGHTS

## **Background**

The Declaration of Human Rights adopted by the United Nations and the European Convention for the Protection of Human Rights and Fundamental Freedoms state what is required and expected of the international community when it comes to observing and respecting human rights.

## **Corporate principle**

We respect and promote all regulations in force to protect human rights and children's rights (hereinafter called human rights) as a fundamental and general requirement throughout the world. We reject all use of child labour and forced or compulsory labour as well as all forms of modern slavery and human trafficking. This applies not only to cooperation within our company but also as a matter of course to the conduct of and toward business partners.

## **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 happening around me.

If I have concerns regarding human rights abuse in my professional surroundings, I prevent it and/or stop it. I inform my manager or get in touch with any of the contacts listed in chapter 7.

## **Example**

*You are responsible for purchasing specific goods. You receive information that a supplier with which you do business uses children in the production process, or that employees are made to work in inhumane conditions (e.g. exposed to health risks).*

*Take the necessary steps and inform your manager and the units responsible for sustainability in supplier relations. Our company must examine business relations with this business partner more closely and, if necessary, break them off.*



# EQUAL OPPORTUNITY AND EQUAL TREATMENT

## Background

Equal opportunities and equal treatment are key cornerstones of a fair, unprejudiced and open approach. Scania encourages respectful cooperation in a spirit of partnership, diversity and tolerance. That is how we achieve a maximum degree of productivity, competitive and innovative capability, creativity and efficiency.

## Corporate principle

We offer equal opportunities for everyone.

We do not discriminate or tolerate discrimination on grounds of ethnic or national origin, sex, religion, views, age, disability, sexual orientation, skin colour, political views, social background or any other characteristics protected by law. We embrace diversity, actively encourage inclusion and create an environment that fosters each employee's individuality in the interests of the company.

As a matter of principle, our employees are chosen, hired and supported based on their qualifications and skills.

## My contribution

I observe the principles of equal opportunity and equal treatment and encourage people around me to do the same.

If I see any contravention of the principles of equal opportunity and equal treatment (disadvantagement, harassment or mobbing), I make the persons involved aware of their misconduct. If I am not in a position to influence the events directly, I notify my manager of the incident or get in touch with any of the contacts listed in chapter 7.

## Example

*You find out from a colleague who is a friend of yours that an applicant in his department was rejected because of the colour of his skin, although he was the best candidate for the advertised job.*

*Help clarifying the situation by reporting the case to your manager and/or the relevant Human Resources function so that appropriate steps can be taken.*



SCANIA



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# PRODUCT CONFORMITY AND PRODUCT SAFETY

## **Background**

Countless people come into contact with our products and services on a daily basis. Scania bears a responsibility for preventing, to the extent possible, any risks, detrimental effects and hazards to the health, safety, environment and assets of our customers or any third party arising from the handling and use of these products and services.

## **Corporate principle**

For that reason, it is not only our statutory duty but also our mission to comply with the laws and regulations as well as the internal standards that apply to our products. Our products are state of the art and are developed in accordance with legal requirements. This is monitored continually and systematically through processes and structures, as well as through product surveillance under real field conditions. We make no compromises on that. We ensure that suitable measures can be taken in good time in the event of any discrepancies.

## **My contribution**

If I notice or have concerns that our products could present a threat or that regulations are not being observed, I counteract. I report the matter to my manager and to the relevant contacts in the company such as the Product Safety Officer.

## **Example**

*A customer reports technical problems with a vehicle to you. You are not sure whether or not they are due to a mistake on the customer's part when operating the product, and you cannot definitively rule out a manufacturing or construction defect.*

*Clarify the matter. It is essential to ensure that our company will solve a problem for which it is responsible. Even customer mistakes when operating the product may require the company to respond (e.g. by modifying operating instructions or user training).*



bimael Gavidia

SCANIA



# ENVIRONMENTAL PROTECTION

## **Background**

Scania develops, produces and distributes vehicles, services and mobility solutions worldwide. Scania's vision is to be the leading global provider of sustainable transport solutions. In pursuing this vision, the company is aware of its special responsibility toward the environment.

## **Corporate principle**

As a commercial enterprise, we bear responsibility for the environmental compatibility and sustainability of our products, locations and services. We focus on environmentally friendly, advanced and efficient technologies, which we implement throughout the entire lifecycle of our products. Starting with the early phases of development and production, we make sure we manage natural resources carefully and steadily reduce the environmental impact to comply with environment protection laws and regulations.

Furthermore, we constantly reassess the environmental compatibility of products and manufacturing processes, optimising these where necessary.

We are a responsible member of society and a partner for politics. We seek a dialogue with these players on future mobility concepts and on shaping ecologically sustainable development.

## **My contribution**

I bear environmental protection in mind 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 applicable environmental protection laws and regulations.

## **Example**

*You notice that there is a leak in a tank and that significant amounts of chemicals are seeping into the ground.*

*Do not rely on somebody else reporting the leak. Immediately inform one of the employees responsible and draw attention to the problem.*



preem  
café  
publika

Wireless fast charging electric hybrid

SL  
SCANIA

YBH 872

Partnership for a sustainable society

# DONATIONS, SPONSORING AND CHARITY

## Background

Scania makes donations (contributions on a voluntary basis with no expectation of a consideration in return) and grants sponsoring monies (contributions based on a contractually agreed consideration) 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 sponsoring measures are permitted only in the context of the respective legal framework and in accordance with the applicable internal rules of the Scania Group.

## Corporate principle

Scania conducts sponsoring measures and donations to support science and research, education, charitable causes, sports and culture. We grant donations only to recognised non-profit organisations or organisations that are authorised by special provisions to accept donations.

The granting of donations and sponsoring measures is permitted only in accordance with a transparent approval process.

## My contribution

If I consider a particular sponsoring measure to be worthy of support, I make initial contact with the appropriate functions in the company (e.g. Compliance, Communications, Public Affairs and Marketing).

The granting of donations must be transparent; the purpose, the recipient of the donation, and the donation receipt issued by the recipient must be documented and verifiable. I comply with internal processes and do not initiate any donation that could damage the reputation of our company.

## Example

*A local politician asks you, a successful Scania employee, for a cash donation from Scania for the election campaign.*

*Turn down the request. Donations may be granted only after going through the required approval process. In this specific case, the donation cannot be approved because Scania's internal rules prohibit politically motivated benefits, such as donations to political parties, party-affiliated institutions and politicians.*



# COMMUNICATION AND MARKETING

## Background

Scania believes it is important to communicate clearly and openly with employees, business partners, shareholders, investors, the media and other stakeholders using honest and lawful means. All our employees bear a responsibility to observe internal communication rules to ensure that we present a unified and consistent image of Scania. All our employees recognise the achievements of those they engage with and respect their professional and personal reputation.

## 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 executing any planned communication or marketing measures, such measures must first be coordinated with the responsible Communications or Marketing function.

## My contribution

I do not issue any public statement for my company and always refer any requests to the Communications function. 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 Scania Social Media guidelines for advice on proper conduct in social networks.

## Example

*You read a comment on the internet from someone who is critical of production methods in Asia, but the points raised are entirely unfounded.*

*Even if you would like to correct the misrepresentation straightaway, contact the relevant function first, because this function is in a position to respond appropriately and comprehensively to such criticism.*



# POLITICAL LOBBYING

## **Background**

Politics and legislation exert an influence on the economic framework for business processes. Scania's participation in commercial trade means that it also has an impact on society and can specifically promote its interests during decision-making processes, such as those for legislation plans, through political lobbying.

## **Corporate principle**

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. Dishonestly influencing policymakers and government is not permitted.

## **My contribution**

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

## **Example**

*An acquaintance of yours is a member of parliament. You know that a legislation proposal that is important for Scania is currently being discussed in parliament and you contemplate contacting your acquaintance to explain the Group's interests in connection with this proposal.*

*Do not approach your acquaintance about the issue. Political lobbying in the company is exclusively coordinated centrally and conducted openly and transparently. The appropriate point of contact for such lobbying measures is the Public Affairs function.*







## **5. OUR RESPONSIBILITY AS A BUSINESS PARTNER**

Integrity, transparency and fairness are key to creating credibility and trust in business practice. That is why Scania sets particularly great store by systematically implementing its legal framework, intragroup guidelines and corporate values, and by communicating them clearly.

This also includes distributing our products and services exclusively through our authorised distribution partners.

Scania's responsibility as a business partner specifically gives rise to the following principles:

# CONFLICTS OF INTEREST

## Background

There is a potential conflict of interest if the private interests of a Scania employee clash or could clash with the interests of Scania. Such a conflict of interest may arise particularly as a result of secondary employment. If an employee places personal interests above those of the company, it could damage Scania.

## Corporate principle

We respect the personal interests and the private lives of our colleagues. However, it is important to us to avoid conflicts between private and business interests, or even the appearance of such a conflict. All our decisions are made exclusively on the basis of objective criteria and we do not allow ourselves to be swayed by personal interests or relations.

## My contribution

I avoid even the appearance of any conflict of interest and disclose any apparent or actual conflict of interest to my manager and if required also to the appropriate Human Resources function. We jointly seek a solution that is not detrimental to the company's interests.

## Example

*Your manager asks you to review bids from several suppliers of plastic components. You discover that one of the most favourable bids is from the company of a good friend. What do you do?*

*Inform your manager of the situation and disclose the potential conflict of interest. Agree the further approach with your manager. In case of questions or doubts, contact the Compliance function.*



# GIFTS, HOSPITALITY AND INVITATIONS

## **Background**

Benefits in the form of gifts, hospitality and invitations are prevalent in business relationships. These benefits are not a cause for concern as long as they are within reason and do not contravene any internal or statutory rules. However, if such benefits exceed what is reasonable and are misused to influence third parties, those involved may be liable to prosecution.

## **Corporate principle**

Scania's internal rules on handling gifts, hospitality and invitations to events set out what benefits are appropriate and what steps must be taken when accepting and granting benefits.

## **My contribution**

I familiarise myself with Scania's internal rules on handling gifts, hospitality and invitations to events, and strictly abide by them.

I check my conduct in this regard to see whether there may be any conflicts of interest or whether any could arise.

## **Example**

*An employee from a Scania supplier gives you a valuable birthday gift that you are possibly not permitted to accept under the internal rules.*

*Even if you are of the opinion that accepting this gift does not affect business relationships, you are not allowed to disregard Scania's internal rules on handling gifts, hospitality and invitations to events. When in doubt, do not accept the gift. If you are concerned that rejecting the gift could be misconstrued, contact your manager and agree on a solution. In case of questions, contact the Compliance function.*



# PROHIBITION OF CORRUPTION

## Background

Corruption is a serious problem in commercial trade. It generates decisions based on improper grounds and prevents progress and innovation as well as distorting competition and damaging society. Corruption is prohibited. It may incur fines for Scania and sanctions under criminal, civil and labour law for the employees involved.

## Corporate principle

The quality of products and services from our company is the key to our success. We do not tolerate corruption. We grant benefits to business partners, customers or other external third parties only within the permissible legal framework and in line with existing internal rules.

## My contribution

I never bribe others and I never accept a bribe, either directly or indirectly.

I take responsibility for informing myself by consulting the internal rules before I give or accept gifts, issue or accept invitations, or offer or receive hospitality.

If I receive any corruption-related tip-offs, I immediately inform one of the contacts listed in chapter 7.

## Example

*You are responsible for sales in a Scania Group company and would like to outstrip this year's revenue target. You prepare a bid for a major contract where a potential customer has issued a call for tender. The relevant decision maker on the customer side offers to influence award of the contract in favour of your company in return for an appropriate consideration.*

*The request of the customer constitutes corrupt behaviour. Inform your manager and the Compliance function immediately (see the contacts listed in chapter 7).*





# DEALINGS WITH PUBLIC OFFICIALS AND HOLDERS OF POLITICAL OFFICE

## **Background**

Dealings with public officials or holders of political office, governments, authorities and other public institutions often involve special statutory rules, any individual breach of which may have serious consequences and could permanently bar Scania from public contract awards.

## **Corporate principle**

Our contacts with public officials and holders of political office are strictly in line with all laws and legislation as well as the relevant internal rules concerning the avoidance of conflicts of interest and corruption. We do not make any “facilitation payments”. Such payments are sums paid to public officials to accelerate routine administration matters.

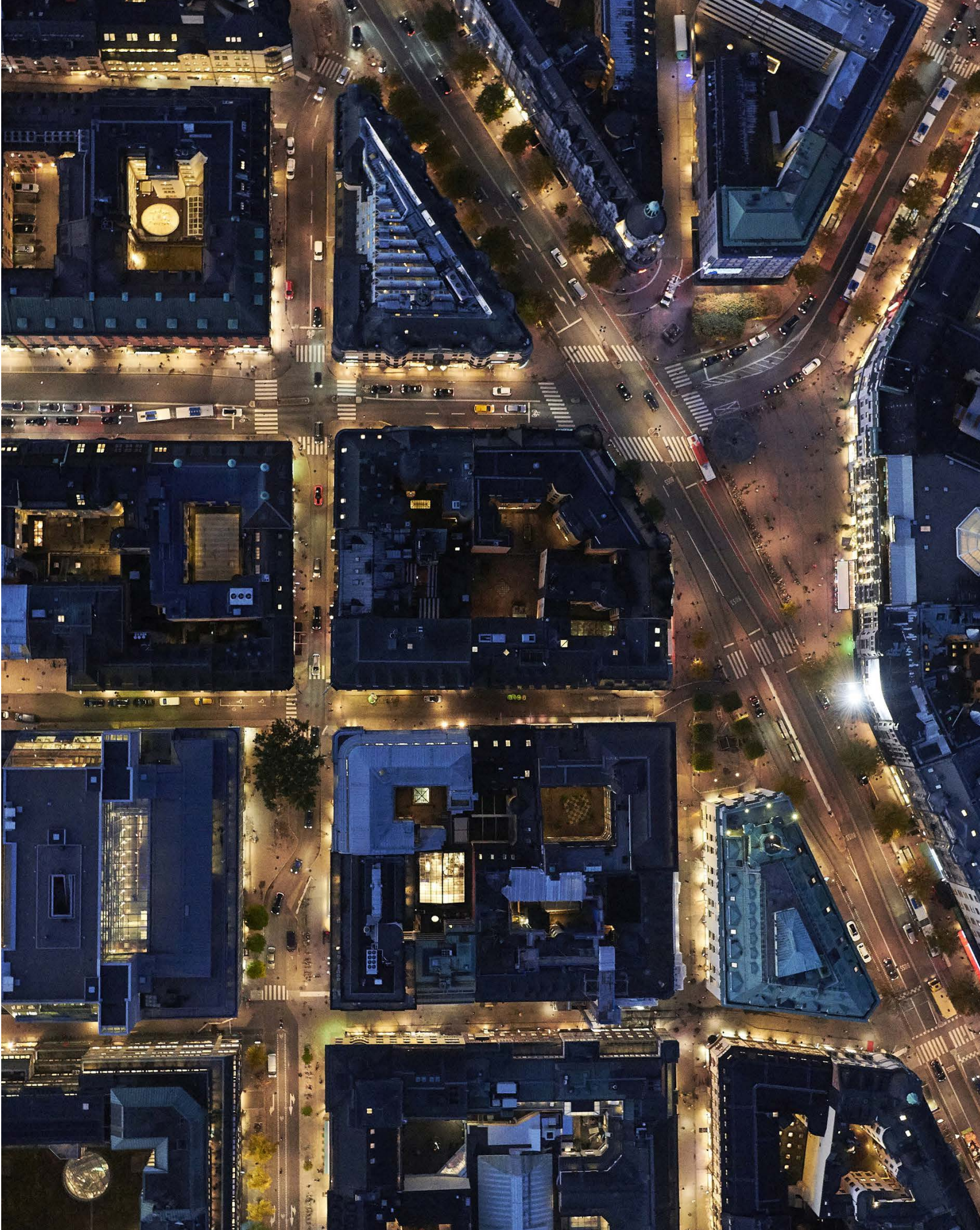
## **My contribution**

I am aware that particularly strict rules apply when dealing with public contract awarders and I familiarise myself with these rules. In case of questions, I contact the Compliance function.

## **Example**

*You know that an authority is planning a call for tender for a major contract. You consider asking the authority's employee responsible for the tender, who you know from a previous project, to design the tender in such a way that Scania wins the contract.*

*Do not under any circumstances take any such action. Exerting this kind of influence would be illegal.*



# SALES INTERMEDIARIES

## Background

Scania may engage third parties with an intermediary and/or representative function that act in the interests or on behalf of Scania to support Scania's sales of products or services. However, there is no guarantee that these sales intermediaries will follow the same high ethical principles of conduct that Scania does itself. In order to mitigate the risk that the remuneration paid to such intermediaries will not be used as corruption funds, due diligence of the intermediaries must be conducted. Infringements of laws by sales intermediaries can damage Scania's reputation and even lead to legal liabilities for Scania, which may result in high penalties.

## Corporate principle

We only engage sales intermediaries in compliance with laws and internal Scania rules. This ensures that remuneration is only paid for services that are actually rendered and that the payments correspond to the performance rendered.

## My contribution

I conduct necessary due diligence measures prior to engagement of sales intermediaries. I check the integrity of sales intermediaries carefully before entering to any business dealings including but not limited to signing a contract, issuing instructions and executing payments. I follow Scania's internal rules on engaging business partners with an intermediary function.

## Example

*Scania takes part in a public tender. An agent approaches you and informs you that in exchange for an additional agency fee he can make sure that the contract will be awarded to Scania.*

*Do not accept the suggestion readily. You and Scania may be liable to prosecution in case you approve the additional agency fee and the agent uses this fee as a bribe to ensure that Scania is awarded the contract. In order to limit the risk, you must check the integrity of the agent.*



# PROHIBITION OF MONEY LAUNDERING AND TERRORISM FINANCING

## Background

Laws against money laundering and terrorism financing are in place in almost all countries worldwide. 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 is/are made available to commit criminal acts of terrorism or to support terrorist organisations. Liability for money laundering does not require the person involved to be aware that money is being laundered through the legal transaction concerned or the transfer concerned. Inadvertent involvement in money laundering may already be sufficient grounds for serious penalties for everyone involved.

## Corporate principle

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 investigate 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 Compliance function or one of the contacts listed in chapter 7.

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

## Example

*One of Scania's customers has overpaid and asks you for transferring the excess amount to an account held in Switzerland or by paying it back in cash instead of repaying the excess amount via bank transfer to the original business account.*

*Do not accept the suggestion readily. This kind of request requires an explanation. Ask the customer why the amount cannot be repaid in the same way it was originally paid. Seek advice from the Compliance function.*



# ACCOUNTING AND FINANCIAL REPORTING

## Background

Scania can build and retain the trust of the general public, its shareholders and contract partners only through proper accounting and correct financial reporting. Any irregularities may have serious consequences for the company as well as for those responsible.

## Corporate principle

We strictly comply with the statutory provisions for proper accounting and financial reporting. Transparency and correctness are our top priorities. 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 organise processes so that all business financial data can be entered into the accounting system correctly and promptly. If I have any questions about the correct recording of data, I contact my manager or the appropriate finance function.

## Example

*You negotiated a good sales deal with a customer. Unfortunately, you know the trucks won't be delivered to the customer before the end of the quarter. According to the applicable accounting rules, revenue recognition requires the delivery of the trucks. No revenue recognition means you won't receive your bonus for the current quarter, extra money you could really need. You consider still recording the deal as a revenue for this quarter.*

*Refrain from taking such action. Entries must always be posted accurately. Posting entries inaccurately may have serious consequences for the company or individual employee.*



**SCANIA**

*Business overview*





# TAXES AND CUSTOMS

## **Background**

Our global operations and the development of new markets mean that we must comply with a raft of different regulations relating to external trade, tax and customs law. Observing tax and customs regulations builds trust with customers, financial authorities and the general public. Any irregularities can cause significant financial damage to Scania, also seriously impacting Scania's reputation and having negative consequences for the employees responsible as well.

## **Corporate principle**

We are aware of our social responsibility to meet our obligations with regard to taxes and customs, and we explicitly endorse compliance with national and international legislation.

## **My contribution**

Within my area of responsibility I design internal structures and processes in such a manner as to ensure that the taxes and customs to be paid by the respective Scania companies are calculated correctly, promptly and in full, are disclosed in reporting, and are paid to the appropriate fiscal authorities.

If I have information concerning the infringement of tax and customs regulations in my area of responsibility, I undertake every action I can to prevent or stop this infringement. If that is not possible, I get in touch with the Tax and Customs function.

## **Example**

*You are responsible for entering certain business transactions, such as general overheads (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 capitalised 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.*



# FAIR AND FREE COMPETITION

## Background

Fair and free competition is protected by the applicable competition and antitrust legislation. Complying with this legislation ensures that market competition is not distorted — which is to the benefit and in the interest 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. Abusing a dominant market position is also inadmissible. Such abuse can, for example, take the form of treating customers differently for no objective reason (discrimination), refusal to supply, imposing unreasonable purchase/selling prices and conditions, or unjustified tie-in arrangements for the requested additional service. Anti-competitive conduct has the potential not only to significantly damage Scania's good reputation, but also to incur severe fines and penalties.

## Corporate Principle

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

We do not enter into any anti-competitive agreements with competitors, suppliers or customers. If Scania 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 authorised distribution partners.

## My Contribution

Whenever I come into contact with competitors, I ensure that no information is imparted or received that allows conclusions to be drawn about the informer's current or future business conduct.

I avoid conversations or any other contact with competitors about issues that are important among the competition. Such issues include prices, pricing, business planning, development status and delivery times.

## Example

*You talk to a competitor's employee at a trade fair. After a while, you notice you are being sounded out for information about Scania's future business planning. In return, the employee offers to divulge the same information about the competitor's company.*

*Immediately make it absolutely clear to the competitor's employee that you will not talk about such issues. This type of conversation — apart from the unauthorised disclosure of business secrets — is also a breach of prevailing competition and antitrust legislation and could have drastic consequences for you personally, Scania, and both the competitor's employee and the employee's company. Inform the Compliance function immediately in order to discuss the further approach.*



# PROCUREMENT

## **Background**

Scania is contractually bound to a large number of suppliers and service providers in its business operations.

## **Corporate principle**

We carefully select suppliers and service providers based on objective criteria.

When purchasing products and services, we involve the appropriate Purchasing functions as laid down in the applicable procurement rules.

## **My contribution**

I show no bias in favour of a supplier or service provider without an objective reason, and I avoid any conflict of interest.

I do not purchase any products or services without first having looked at the market and alternative suppliers. I follow the relevant procurement principles and involve the appropriate Purchasing function at an early stage in the purchasing process.

## **Example**

*It comes to your attention that a Scania employee would like to commission a supplier against the applicable procurement principles without involving the appropriate Purchasing function.*

*Notify the appropriate Purchasing function or one of the contacts listed in chapter 7 to ensure that the bid that is most cost-effective for the company has a chance.*



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# EXPORT CONTROL

## **Background**

Export control can impose prohibitions or restrictions and may require approvals from authorities or other monitoring measures on the cross-border exchange of goods. These provisions under export control legislation apply to technologies and software as well as goods. Apart from exports per se, export controls may also apply to the temporary cross-border transfer of, for instance, objects and technical drawings taken on a business trip, or technical transmissions by e-mail or cloud.

Furthermore, any business with persons or companies named in sanctions lists is strictly prohibited, regardless of the delivery process.

## **Corporate principle**

We comply with all provisions for importing and exporting goods, services and information.

## **My Contribution**

When making a decision concerning the import or export of products and services, I consciously examine whether the decision may fall under export control. When in doubt, I seek advice from the function responsible for customs and international trade law.

## **Example**

*You receive an inquiry from a potential customer wishing to place an order with Scania to supply products in a country that has possibly been listed as an embargoed country.*

*Clarify the matter by asking the relevant function about export restrictions that apply to the country to be supplied (e.g. UN, US or EU sanctions) and do not conclude any contracts that bind Scania to export to this country until the issue has been fully clarified.*





# PROHIBITION OF INSIDER TRADING

## Background

Legislation (in Europe, for example, particularly the Directive on Criminal Sanctions for Market Abuse (Market Abuse Directive)) prohibits the use or disclosure of inside information in the trading of shares, other securities or financial instruments. The same applies to recommending or inciting a third party to engage in insider trading and to the unlawful disclosure of inside information. Pertinent national legislation may stipulate further prohibitions. Inside 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 security (e.g. Volkswagen shares) or financial instrument.

## Corporate principle

We handle information pertaining to share performance in accordance with capital market requirements and do not tolerate any insider trading. We may use knowledge relating to insider-relevant projects and processes only internally in accordance with the applicable intracompany rules 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 incite 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 rules. I familiarise myself with the applicable internal rules.

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

## Example

*You learn through your work with Scania that the acquisition of a new business is going to be announced soon by the Volkswagen Group. You know that a very good friend is currently considering whether to sell his Volkswagen shares. Since the price of Volkswagen's shares will likely rise once the acquisition of the new area of business has been announced, you consider telling your friend that he should hold off on selling his shares.*

*Do not tip your friend off under any circumstances. Since the information of which you are aware is not public, but inside 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.*





## **6. OUR RESPONSIBILITY IN THE WORKPLACE**

It is in the fundamental interests of Scania to protect the health and safety of every employee.

The principle of protection and security also applies to employee and customer data as well as company-specific know-how and company assets.

The Scania Group's responsibility in the workplace specifically gives rise to the following principles:

# OCCUPATIONAL SAFETY AND HEALTHCARE

## **Background**

Scania is committed to its responsibility for the safety and health of its employees. We provide occupational safety and healthcare in line with the provisions of national regulations and with the occupational health and safety policy of the company.

## **Corporate principle**

We preserve and promote the health, performance and job satisfaction of our employees through continuous improvements in the working environment and a raft of preventive healthcare and health promotion measures.

## **My contribution**

I comply with the occupational health and safety rules. I never put the health and safety of my colleagues or business partners at risk. I take all appropriate and statutory precautions to ensure that my workplace always enables safe working. I make an active contribution to maintaining and promoting my health by voluntarily participating in preventive healthcare and health promotion measures.

## **Example**

*You notice that a machine in your department has an electronic fault.*

*Take the machine out of operation and make sure the "out of order" sign is clearly displayed. Ask the appropriate function to repair the machine because repairing electrical equipment yourself is not permitted and could be dangerous.*



# DATA PROTECTION

## Background

There are special statutory rules to protect privacy when dealing with personal data. As a general rule, collecting, storing, processing and other use of personal data require the consent of the person concerned, a contractual arrangement or some other legal basis.

## Corporate principle

We protect the personal data of employees, former employees, customers, suppliers and other affected parties.

We collect, gather, process, use and store personal data strictly in accordance with legal provisions.

## My contribution

I ensure that personal data is collected, stored, processed or used in any other way only with the consent of the person concerned, under a contractual arrangement or some other legal basis.

All data processing components must be secured in such a manner that the confidentiality, integrity, availability, verifiability and reliability of such sensitive data is guaranteed, and that unauthorised internal or external access is prevented.

When in doubt, I contact my manager or the appropriate Data Protection Officer.

## Example

*You have organised a seminar for Scania with external participants and receive personal data from the participants for it. A colleague asks you to pass the addresses on.*

*Do not pass this data on without consulting one of the contacts mentioned above. As a general rule, data may be used only for the purpose for which it was communicated.*





# SECURITY AND PROTECTION OF INFORMATION, KNOW-HOW AND INTELLECTUAL PROPERTY

## Background

Scania holds internationally protected patents and also has extensive trade and business secrets in addition to technical know-how. This knowledge is the basis of our business success. Unauthorised transmission of such knowledge may lead to extremely high losses for Scania and to consequences under labour, civil and criminal law for the employee concerned.

## 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. When in doubt, I contact my manager or the appropriate Information Security function.

## My contribution

I handle all Scania and Volkswagen Group information carefully and do not disclose it to unauthorised 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 Scania sites and want to take your laptop, on which the relevant documents are saved, with you for presentation purposes. You intend to go over these documents again on the plane or the train on the way to the individual sites.*

*Ensure that no one obtains knowledge of sensitive information belonging to Scania, 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.*



# IT SECURITY

## **Background**

Information technology (IT) and electronic data processing (EDP) have become an integral part of everyday life at Scania. At the same time, they involve numerous risks, foremost of which are impairment of data processing as a result of malware (viruses), loss of data due to program errors, and data misuse (e.g. due to hackers).

## **Corporate principle**

We respect IT and EDP security and abide by the applicable regulations. When in doubt, I contact my manager or the appropriate Information Security function.

## **My contribution**

I familiarise myself with the applicable IT security regulations and observe the rules contained therein.

I am aware that unencrypted data exchange (e.g. by e-mail or USB stick) is not a secure means of communication.

## **Example**

*You are out of the office and are given a USB stick in order to exchange a document at a meeting.*

*Use only Scania data carriers or data exchange systems and proceed according to the guidelines for information classification. Arrange for the document to be e-mailed to you, for example. Never open e-mails or attachments that appear to be suspicious or that come from unknown e-mail addresses. That is how you prevent malware from entering the company network.*



# HANDLING COMPANY ASSETS

## **Background**

Scania's tangible and intangible assets serve to help our employees achieving the company's business objectives and may be used only for business purposes.

## **Corporate principle**

We respect Scania's tangible and intangible assets and do not use them for non-business purposes.

## **My contribution**

I adhere to Scania's rules and exercise care when handling company assets.

## **Example**

*Your soccer club is planning a weekend trip. The trainer asks whether you, as a Scania employee, can "organise" a bus from Scania's fleet.*

*In general, it is not allowed to use company assets for private purposes. Exceptions are subject to approval by the responsible function and have to follow the internal rules.*





# 7. SUPPORT

If needed, internal and external points of contact provide support for dealing with the Code of Conduct. Furthermore, voluntary commitments and principles are applicable. You can find all Scania Group Policies on the intranet “Reflex”.

## Employee representation

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

We are committed to working with employee representatives in candour and trust, to conducting a constructive and cooperative dialogue, and to striving for a fair balance of interests. Professional dealings with employee representatives that do not allow either privilege or discrimination are part of our corporate culture.

Safeguarding the future of Scania 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 viability and jobs are equal and shared goals.

## Help / contacts / whistleblower system

Our first point of contact for any questions or uncertainties regarding the Code of Conduct is our manager. In addition every employee can also contact the Governance, Risk & Compliance function.

Further contact points are the HR functions and employees representatives.

We can address complaints and information relating to existing Scania rules to the relevant offices.

If we suspect a violation of the Code of Conduct or any other misconduct in our work environment, we can contact the Central Investigation Unit at Group Internal Audit to report this – either giving our name or making our report anonymously.

Scania’s whistleblower system is committed to protecting the whistleblower and the individual affected. We do not tolerate retaliation of or pressure on whistleblowers. The individuals affected are presumed innocent until proven otherwise.

Further information can be found in the Scania Group Policy on Whistleblowing.



# SELF-TEST FOR DECISION GUIDANCE

If at any time I am unsure whether my behaviour 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 favour of all such cases being decided the same way companywide?  
(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 behaviour 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 chapter 7.



