



**Code of conduct of ADAC Versicherung AG
for suppliers and business partners of
ADAC Versicherung AG**



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Preface

Our Code of Conduct for Suppliers is not static but will continue to evolve and be adapted to the constantly changing legal and economic conditions ADAC Versicherung AG is subject to. Therefore, ADAC Versicherung AG reserves the right to amend the requirements under this Code of Conduct from time to time, notifying all suppliers/business partners of any such amendments in writing.

All principles described in the following sections comply with the business values and principles laid down by ADAC Versicherung AG.

1. Corruption, antitrust laws and further ethical standards

Corruption, extortion, breach of trust and embezzlement in whatever form are prohibited. Accepting bribes or similar payments and gifts for one's own benefit is also prohibited. This ban applies to suppliers'/business partners' subcontractors as well.

Our suppliers/business partners shall not offer employees of ADAC Versicherung AG gifts of cash or cash equivalents. Even the mere impression of being susceptible to third-party influence must be avoided, especially at business events and the like. Therefore, the maximum allowed value of gifts for employees of ADAC Versicherung AG is €50. For the avoidance of doubt, invitations are permitted strictly for business reasons and within reasonable limits.

Compliance with our non-discrimination policies is mandatory in selecting and dealing with suppliers. Fair competition, fair contracts with business partners and compliance with applicable antitrust laws are necessary requirements.

2. No child labour

All employees must be at least 15 years of age. This minimum age of employment is based on several ILO (International Labour Organization) conventions.

These conventions regulate internationally applicable minimum standards. If a higher minimum age of employment applies in the country of our suppliers'/business partners' permanent establishment, they have to comply with that requirement. In countries where the exception for developing countries applies, the minimum age may be lowered to 14 years of age.

Moreover, our suppliers/business partners shall not assign any dangerous tasks to staff under 18 years of age. Tasks are considered dangerous if there is an increased risk inherent in the working method, the nature of activity, the substances used or the working environment, due to the impossibility of taking adequate protective measures.

3. No forced labour or abuse

Any form of forced labour is prohibited. We expect our suppliers/business partners to treat their staff fairly and neither to subject them to sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse, nor to threaten them with any such treatment.



4. Non-discrimination

Workers shall not be discriminated against, favoured or excluded in relation to hiring and/or promotions, based on race or ethnic origin, gender, religion or personal views, disability, age or sexual identity/orientation.

Our suppliers/business partners shall ensure that there is no discrimination whatsoever against staff based on the above aspects.

5. Working hours, wages and other benefits

Staff must be paid at least the minimum wage and benefits prescribed by national laws. We expect our suppliers/business partners to pay their staff on a regular and timely basis. Our suppliers/business partners shall not impose any punitive measures in the form of illegal or inadmissible wage deductions.

Should the legal minimum wages or minimum industrial standards not cover the cost of living, our suppliers/business partners are requested to pay sufficient remuneration to cover the basic needs.

Our suppliers/business partners shall also comply with the laws and regulations regarding working hours and rest periods. Each member of staff is entitled to at least one day of rest after six consecutive working days.

We expect our suppliers/business partners to provide adequate staff training opportunities.

6. Guarantee of freedom of association and protection of right of association

In accordance with the law, staff shall be entitled to associate freely, join trade unions, constitute workers' councils, elect employee representatives, engage in negotiations etc.

Any such staff shall not be disadvantaged by our suppliers/business partners.

7. Health and safety

Applicable occupational health and safety regulations must be complied with. This means that suitable measures and means for protection against any chemical, physical and mechanical hazards in the workplace and the respective available infrastructure must be ensured.

This also includes appropriate monitoring, safe workflows, preventive maintenance and protective as well as precautionary measures (e.g. instructions, guidelines, training, emergency plans incl. reporting processes) against accidents and work-related illnesses.

If the above measures do not allow suitable monitoring and prevention of hazards, our suppliers/business partners shall equip their staff with suitable protective clothing.

Moreover, all staff shall be educated and trained on this subject.



8. Environment

Compliance with the applicable national environmental laws and regulations is mandatory. This means that all required certificates, approvals and related requirements must be present and implemented.

We also expect our suppliers/business partners to minimise environmental pollution and to continuously improve measures for environmental protection. Our suppliers/business partners shall install systems ensuring safe handling, transport, storage etc. of waste, exhaust gases and sewage. Pollution with a negative impact on people's health and/or on the environment and climate must be adequately handled or controlled and must be minimised or eliminated at the source or by adequate processes.

Natural resources (e.g. water and raw materials) must be used economically.

We expect our suppliers/business partners to promote the development of climate-friendly products, processes and methods in their own companies.

9. Quality and product safety

Compliance with generally accepted or contractually agreed product quality standards is mandatory. We expect our suppliers/business partners to use programmes for control and maintenance of work processes in accordance with the applicable safety standards and, if necessary, to perform risk analyses and take precautionary measures.

Upon request, our suppliers/business partners shall provide ADAC Versicherung AG with safety data sheets containing all safety-relevant information.

10. Commitment

Acceptance of and compliance with all laws, provisions, contractual agreements and agreed standards is mandatory. Non-compliance shall have consequences as set forth in Section 12 - Verification and sanctions.

Our suppliers/business partners shall introduce and/or implement processes for identifying, determining and monitoring the risks referred to in this Code, in laws and provisions, contractual agreements and standards. For instance, we expect our suppliers/business partners to put communication systems in place for staff to report unlawful activities or behaviour. Confidential treatment and subsequent investigation of such reports are mandatory.

We expect our suppliers/business partners to take suitable measures for continuous improvement of their own sustainability performance (based on this Code).

11. Communication, information and documentation

We expect our suppliers/business partners to communicate in an open and constructive manner with their employees and business partners.

Our suppliers/business partners are obliged to make their staff aware of applicable legal provisions, agreements and standards in order to prevent unlawful activities. Moreover, we expect them to



communicate the policies outlined herein to their staff. The above objectives shall be achieved, for example, by suitable training and information media.

We require our suppliers/business partners to communicate the policies of this Code of Conduct to their suppliers as well.

All confidential information must be protected. Our suppliers/business partners shall comply with the applicable data protection provisions at all times. This also applies to intellectual property, whether it is their own employees' or their business partners'. Any disclosure thereof to third parties is strictly prohibited.

12. Verification and sanctions

Our suppliers/business partners shall allow ADAC Versicherung AG to monitor compliance with these policies or to have a third party, authorised by both parties, perform said monitoring.

ADAC Versicherung AG shall be entitled to initiate consequences for non-compliance with this Code of Conduct. First, the party found not to comply shall be requested to remedy and/or remove the deficiencies within a corresponding time limit, depending on the nature and extent of non-compliance. Our suppliers/business partners shall document the process and submit the documentation to ADAC Versicherung AG without being requested to do so.

Failure to remedy and/or remove the deficiencies within the given time limit, or repeated violation of this Code of Conduct, will result in our suppliers/business partners being blacklisted and/or the cooperation being terminated.

13. Sources

ADAC Articles of Association:

<https://www.adac.de/-/media/pdf/impresum/adac-satzung.pdf?la=de-de&hash=AB46BFE9CA120BC91AD68004B0DE47A9>

Bundesverband Materialwirtschaft, Einkauf und Logistik e.V. (German Association for Supply Chain Management, Procurement and Logistics):

https://www.bme.de/fileadmin/_horusdam/2065-BME-Code_of_Conduct_deutsch.pdf (German only)

United Nations Global Compact:

www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html

International Labour Standards (ILO):

<http://www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/lang--de/index.htm>
(German only)

OECD guidelines for multinational enterprises:

http://www.oecd-ilibrary.org/governance/oecd-guidelines-for-multinational-enterprises_9789264060326-en