

VOLKSWAGEN

AKTIENGESELLSCHAFT

Communication and Advertising Principles for the Volkswagen Group

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Preface

The following requirements specify the expectations that Volkswagen Group has for its business partners with regards to the provision of advertising and communication services for the Volkswagen Group and its brands. These requirements are considered the basis for successful relationships between Volkswagen Group and its partners. The requirements are considered the basis for successful execution of business relations between the Volkswagen Group and its partners.

Purpose and Motivation

As a global player, the Volkswagen Group and its brands are committed to sustainable, transparent, and responsible management. This applies in particular to internal and external communications. Our employees, our customers, our stakeholders and the public rightfully deserve communication with respect, integrity and sincerity. Thus, every business partner involved in communicating on behalf of the Volkswagen Group has the responsibility to ensure that in our communication and advertising, both online and offline, human beings, animals and the environment are treated with utmost respect.

We are always aware, it is not only about our intention, but how the message is perceived in the consumer's mindset. We expect the application and observance of the advertising code and the decision table not only from all of our employees, but also from our business partners. Our business partners convey these principles, and the obligations they entail to their own employees as well as to their business partners. In addition, they can implement further rules.

Scope and Coverage

The following communication and advertising principles apply to all business relations between the Volkswagen Group and its business partners that are tasked with creating advertising and corporate communication, especially advertising and communication agencies. Furthermore, business partners must take appropriate steps to ensure that their own business partners comply with these requirements if they are involved in the creation of advertising and communication services for the Volkswagen Group and its brands.

Preliminary Remarks

The communication and advertising principles for business partners complement, among other things, the guidelines of the code of conduct and ensure that our communications, advertising activities and messages are in line with the ethical standards and corporate values of the Volkswagen Group. These principles are in line with our global standard, but also take into account the local and regional rules as well as other specificities such as cultural differences. In addition, the principles provide an overview of critical topics and representations that must be avoided in Volkswagen Group and its brands communication and advertising.

Basic Rules

In particular, communication and advertising activities do not:

- include, accept or tolerate any kind of racism
- abuse consumer confidence or exploit lack of experience or knowledge
- contain realistically appearing horror figures
- contain mutilated people
- ridicule people with disabilities instead of promoting their inclusion
- insult or disparage religious beliefs
- portray any act of violence or war
- portray the death of a person, including suicide
- present a risk of imitating dangerous behaviour (e.g. smartphone at the wheel presented as acceptable behaviour)
- disrespect the right of privacy
- infringe rights of third parties (e.g. image copyrights, intellectual property rights)
- name or portray competitors or competing products in a discrediting, inaccurate or disparaging way
- create fear or exploit misfortune and suffering

Volkswagen Group and its brands promotes the following guidelines which also its business partners should comply with:

- When using symbols and images which have a basis in a local or indigenous culture, the company analyses the potential impact of commercialization of their symbol or image and obtains the informed consent of the representatives of this culture before using the symbols in product development or marketing processes.
- The material characteristics of the product, service or other subject of our advertising and communications are described, depicted or otherwise portrayed in a manner that is accurate and not false or misleading.
- Marketing campaigns are reviewed especially considering vulnerable groups and groups often likely to be discriminated or which need special protection (e.g. children) to ensure that the groups do not feel degraded or the target of hatred or discrimination.
- Within a communication and advertising campaign the risks and impacts of the used content and footage have to be identified, evaluated and supervised with special focus on vulnerable groups.
- Anyone who develops communication and advertising assets for Volkswagen Group must actively ensure that content is assessed and evaluated by competent, non-biased, multi-eyes principles.

- People whose names are officially associated or named with Volkswagen Group or its brands must be chosen based on their integrity first (reputation etc.) and be continuously checked. People who are not named are only checked in case of suspicion. This is particularly applied to: public figures, influencers or brand ambassadors.

Disparagement and Discrimination

Communication and advertising activities do not contain, tolerate or stimulate:

- discrimination against people because of their gender, sexual orientation, ancestry, ethnicity, origin, language, culture, religion, faith, political opinion, age, disability, or membership in a group or organisation
- degrading people because they are not in line with prevailing public perceptions in terms of their appearance, behaviour, characteristics or lifestyle
- any statements on violence or the trivialisation of violence towards people
- showing violence or dominant/ aggressive behaviour as acceptable
- the impression that a person's dignity is not respected or that people are being objectified
- the reducing of people to their sexuality or suggestions of their sexual orientation
- exaggerated nudity conveying a degradation of gender
- any depictions of sexual or porno- graphic nature
- stereotypes that imply that a gender or the identification with a nonbinary gender concept is inferior or unsuitable for the exercise of certain tasks or of a specific function

Children and Young People

Communication and advertising activities do not contain, tolerate or stimulate:

- any behaviour of children which is not in accordance with the child's natural expressions, like sarcasm for example
- children in dangerous situations, unless this is needed to explain safety features
- criminal acts or other misconduct
- children as sexual objects
- realistic scenes which might cause stress for or fear to children, e.g. accidents, family conflicts
- any direct offer motivating children to buy or consume a product or service
- any direct invitation from children or to children for persuading their parents or others to purchase the goods or services advertised
- abuse of the special trust that children have in parents, teachers and other people of trust

Animals

Communication and advertising activities do not contain, tolerate or stimulate:

- violence towards animals
- depictions of sexual or pornographic nature
- abusive behaviour towards animals as acceptable
- content in which animals are treated like objects

Environment

Communication and advertising activities do not contain, tolerate or stimulate:

- violations of rules which protect the environment
- any kind of damage to the environment as acceptable
- any environment-related inadequate use of vehicles
- making fun of any behaviour aiming at environmental and resource protection

Environment and Placement

Environment and placement significantly affect the perception of communication and advertising campaigns. Since media consumers are usually unaware of how advertising bookings work, there is risk that they will assume Volkswagen Group and its brands have deliberately chosen the environment in which a communication sits.

Accordingly, care must be taken in the selection of environments, the placing advertising material and the control- ling of campaigns.

At the same time, this must be reviewed regularly and optimized when necessary.

As a matter of principle, environments or placements that contain, tolerate or accept content in any form in particular the following categories should be excluded:

- racism
- sexism
- political extremism
- pornography
- child endangerment
- cruelty to animals

Legal Consequences of Violation of these Principles

The Volkswagen Group considers compliance with the communication and advertising principles set out in this document – when creating advertising and corporate communication in the name / on behalf of the brands – essential to its business relations.

The Volkswagen Group reserves the right to take appropriate legal action if a business partner of the Volkswagen Group does not comply with these requirements. The ultimate decision lies with the Volkswagen Group and its brands as to whether it is willing to forego such consequences and instead to take alternative action if the business partner can credibly assure and prove that it has implemented immediate countermeasures to prevent comparable violations in the future.