



Integrity and Compliance

MAN Energy Solutions

Future in the making

Overview

Integrity and Compliance at MAN Energy Solutions

As a global enterprise that operates in many business areas, MAN Energy Solutions has a corporate responsibility to its customers, employees, investors, and the public. This corporate responsibility includes complying with laws everywhere and always, respecting ethical values and acting sustainably.

Integrity and compliance are a fundamental part of the MAN Energy Solutions strategy and are practiced at all levels of the Group and by all employees — the Executive Board, management, and all other employees.

The MAN Energy Solutions Integrity and Compliance Program focuses on integrity as well as white collar crime, especially anticorruption and the prevention of money laundering and antitrust law.

The group-wide Integrity and Compliance Program is designed to

- prevent compliance violations (**prevention**),
- detect as early as possible compliance violations that may arise despite preventative measures (**detection**),
- and respond quickly and efficiently to any compliance violations (**response**).

Prevention

The aim of the Compliance Organization is to further establish and promote awareness and understanding of responsible and honest conduct among all MAN Energy Solutions employees, suppliers and business partners.

In order to prevent compliance violations, the Compliance Organization has implemented various measures:

Code of Conduct

The MAN Energy Solutions Code of Conduct applies to all MAN Energy Solutions employees — the Executive Board, management, and all other employees. The Code of Conduct is at the heart of MAN Energy Solutions' corporate culture and sets forth specific and binding guidelines for situations in which managers and employees should pay particular attention to act responsibly. The Code of Conduct uses examples to describe how conflict situations can be addressed in everyday business.

Code of Conduct for Suppliers and Business Partners

MAN Energy Solutions expects its suppliers and business partners and their employees to respect laws and behave responsibly and with integrity, everywhere and always. That is why MAN Energy Solutions has a Code of Conduct for Suppliers and Business Partners, which communicates the ethical standards that MAN Energy Solutions requires suppliers and business partners to uphold.

Communication

The Compliance Organization continuously communicates across all levels of the organization. Integrity and compliance topics are regularly featured in MAN Energy Solutions' company media, such as newsletters, employee magazines, and the Intranet. In addition, the Compliance Organization informs and advises managers and other employees through trainings, the helpdesk service, and at internal conferences and meetings.

Compliance policies

MAN Energy Solutions has group-wide compliance policies, which establish requirements related to anticorruption, antitrust law, the prevention of money laundering and terrorism financing, and Business Partner Integrity. These policies contain binding rules for all employees throughout the Group.

Compliance training program

MAN Energy Solutions has a robust Integrity and Compliance training program which covers all operations and employees worldwide. Diverse training methodologies and formats are used, ranging from e-learning modules to classroom and videoconference trainings. Key content includes information about the Code of Conduct, the MAN Energy Solutions Compliance Organization, compliance policies and guidelines, practical and realistic case studies and other relevant knowledge about anticorruption, antitrust law, and the prevention of money laundering and terrorism.

Exchange of experiences with experts

The Compliance Organization participates in regular exchanges on integrity and compliance topics with experts from industry and academia. Through memberships in external compliance-related initiatives, MAN Energy Solutions supports and encourages Integrity & Compliance initiatives individually and in partnership with other companies.

Helpdesk

MAN Energy Solutions offers a Compliance Helpdesk service to all employees, which they can use to address their integrity and compliance related questions directly to Compliance Officers via phone or e-mail. The queries made to the Compliance Helpdesk provide the Compliance Organization with an overview of the most common questions that arise in the business. The knowledge gained from these questions is used to identify new risks and trends and to identify preventative compliance measures.

Monitoring

To ensure the sustainability of the Integrity and Compliance Program, the Compliance Organization continuously reviews the Program's effectiveness and efficiency, by tracking the implementation of measures and projects. The Compliance Organization also analyses potential weaknesses, in order to strengthen the Integrity and Compliance Program.

Tone from the Top

The Executive Board of the MAN Energy Solutions is aware of its responsibility for integrity and compliance and is committed to fulfilling this responsibility. MAN Energy Solutions' Executive Board and management consider integrity and compliance to be an integral part of the corporate strategy.

Detection

The occurrence of legal violations within the MAN Energy Solutions Group can lead to considerable risks for the MAN Energy Solutions Group and the affected employees. Therefore, integrity and compliance with the law have the highest priority within the MAN Energy Solutions Group. In order to guarantee these values, MAN Energy Solutions has created clear and transparent processes that ensure that violations of the law are identified, clarified and immediately remedied internally.

Compliance risk analysis

The Compliance Organization carries out periodic group-wide compliance risk analysis. The risk analysis takes into account information such as the number and size of individual Group companies, the business model, the customer and sales structure, country risk, and the structure of competition in the local market. In addition, the implementation of compliance measures and controls in the reviewed companies are audited internally.

Mergers and acquisitions (M&A)

To identify, prevent, and mitigate compliance risks during acquisition and divestment transactions, the Compliance Organization is engaged in MAN Energy Solutions' M&A projects. The Compliance Organization undertakes compliance due diligence assessments on concerned entities, which are intended to detect any compliance risks that may arise.

Whistleblower system

MAN Energy Solutions offers a secure whistleblower system for providing information on potential compliance violations, which is accessible to all, employees, customers, suppliers and other business partners. This allows anonymous, safe, and confidential sharing of such information at any time and from anywhere in the world. Tip-offs are forwarded to an independent unit for investigation. All whistleblowers who act in good faith are protected against discrimination and retaliation. You can find more information about the whistleblowing system here: www.volkswagenag.com/hint

Response and resolute accountability

MAN Energy Solutions has zero tolerance for compliance breaches. The right response to compliance violations and misconduct is essential for minimizing the negative impact of any breach, by holding those responsible accountable, and ensuring that our commitment in doing business with integrity remains firm.

Investigations by authorities

MAN Energy Solutions is also committed to cooperating closely with the responsible authorities. MAN Energy Solutions has a guideline for employees, which emphasizes the importance of openness, transparency, and cooperation with authorities' searches.

Continuous improvement of the Integrity and Compliance Program

The Compliance Organization continuously develops and improves the Integrity and Compliance Program.

Contact

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