



**CODE OF  
CONDUCT**

# Contents

SIXT stands up for diversity! However, for reasons of better readability, we use the generic masculine form in this document. This is simply done for simpler sentence structure, and it should only be understood as gender-neutral. The language form is value-free and does not imply any discrimination against other genders.

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# 1. Foreword by the Management Board



Konstantin Sixt  
Co-Chair of the Management Board

Alexander Sixt  
Co-Chair of the Management Board

Our success as a company is based on an impressive business strategy and the daily commitment of our many thousands of employees around the world. Each and every individual plays a vital role in gaining and deserving the trust of our customers, suppliers, colleagues and employees, shareholders and business partners. In order to gain this trust, everyone must not only comply with the letter of the law, but practice sterling ethics.

The Management Board has therefore adopted this Code of Conduct to establish a system of values across the Sixt Group (“SIXT”). It lays down our basic principles for how the company conducts itself in the course of its business and helps us to identify and avoid potential risks in good time.

This Code of Conduct applies worldwide and is binding on all company bodies, executives and employees of SIXT. We are each personally responsible for observing these principles in our work and, if in doubt, seeking out advice on how they apply (e.g., from our supervisors or the Compliance Office). The policy is based on laws, universally valid ethical principles and morally impeccable conduct in business. Non-compliance with these principles may have legal consequences for the group and anyone involved, including disciplinary measures or criminal proceedings. Therefore, we will rigorously investigate and follow up on all violations. The Management Board thanks all executives and employees for implementing this global policy in a responsible and proactive manner.

We expect our business partners and in particular the service providers and suppliers commissioned by us to also comply with the principles anchored in this Code of Conduct and to adopt appropriate measures to ensure the principles are implemented and adhered to.



Prof. Dr. Kai Andrejewski  
Member of the Management Board (CFO)



Nico Gabriel  
Member of the Management Board (COO)



Vinzenz Pflanz  
Member of the Management Board (CBO)



James Adams  
Member of the Management Board (CCO)

# 2. *Our basic principles*

## ***Business self-image***

SIXT is a leading international provider of high-quality mobility services with operations in more than 100 countries. People expect the best of us and we expect the best of ourselves. That's why we're changing the way the world moves, though always while making sure that the customer remains at the centre of everything we do. Our core product is car rental. We are building an ecosystem for everything to do with mobility. We are thus creating a real premium service for our customers, making mobility as simple and flexible as possible. And by driving the green mobility revolution, we are taking responsibility for our society.

It is our designated goal to strike a harmonious balance between people, the environment and profitability.

## ***Openness and transparency***

We base our actions on honesty, openness and transparency, both internally and externally. This is how we build trust. We encourage every individual to openly address grievances and undesirable developments (speak-up culture) by fostering a conducive atmosphere and creating communication channels which allow constructive criticism without fear of retaliation. We value a plurality of opinions. Critical questioning is not only welcome, but elementary in order to constantly develop ourselves further.

## ***We act responsibly in line with the rules***

At SIXT we take responsibility for our actions and decisions and act in accordance with existing rules. In other words: We comply with laws, applicable regulations, guiding standards and this Code of Conduct.

## ***Our employees***

SIXT attaches great importance to being an attractive employer. To this end we offer an inspiring, entrepreneurial work environment that promotes both personal responsibility and personal initiative, while at the same time fostering constructive exchange as well as fair play and equal opportunities. Team spirit, mutual trust and respect are important to us – as are the safety and health of our colleagues.

Our executives foster a culture that aims to further the personal development of every employee. We aim to consistently promote the personal development of our employees, to adequately reward their commitment and to strictly adhere to a remuneration policy based on uniform and fair principles, which excludes any form of discrimination.

**3.** *SIXT is a company that takes  
responsibility*



## 3.1 Human rights

We respect and promote the need for compliance with internationally recognised human rights. All of SIXT's actions related to its working culture at its offices around the world follow

- the International Bill of Human Rights,
- the UN Guiding Principles on Business and Human Rights,
- the Ten Principles of the UN Global Compact,
- the ILO Declaration on Fundamental Principles and Rights at Work and its follow-up instruments,
- the provisions in the International Covenant on Civil and Political Rights (in particular the provisions concerning work safety),
- the ILO Core Labour Standards and
- the OECD Guidelines for Multinational Enterprises.

**We reject child labour in any form.** We are committed to protecting children and allowing them to develop in an undisturbed and healthy manner. Children are our future and are particularly important to SIXT. This is demonstrated in particular by the intensive, global CSR commitment of many employees in the Regine Sixt Children's Aid Foundation "Drying little Tears".

**We reject forced labour in any form.** All work must be voluntary and done without the threat of punishment or any other type of duress.

**We employ people** regardless of their place of origin, religion, skin colour, gender, age, nationality, sexual orientation, disability or political opinion. Discrimination is not tolerated at SIXT.

**We care about our employees.** We respect worker rights worldwide. No one is privileged or disadvantaged for exercising these rights. SIXT stands for fair treatment and direct communication with its workforce.

We expect that all our business partners – especially our service providers and suppliers – are as committed to this respect for human dignity and human rights as we are. We take appropriate action and due responsibility for human rights in line with the guiding principles stated above.



## 3.2 Environmental protection

**SIXT does its part to protect the climate and environment.** Therefore, SIXT complies with environmental laws. We expect our business partners to behave in a climate-conscious manner with due respect for the environment by complying with laws that have been passed to protect the environment.

**For SIXT, the future lies in climate-friendly and resource-conserving mobility.** We see ourselves as the driving force behind a green mobility revolution. The key to this lies in increasing utilisation and in minimising vehicle downtimes by promoting vehicle sharing. Our range of services pays tribute to this idea, from traditional car rental and car sharing to cars with drivers, car subscriptions and micro-mobility. To increase environmental sustainability, SIXT relies on four levers:

- **SIXT will significantly increase the proportion of zero-emission vehicles in its fleet, thereby promoting enthusiasm for e-vehicles and helping to overcome the reservations that the driving public may still have about these vehicles.**
- **SIXT is involved in expanding the e-charging infrastructure and increasing its availability.**
- **SIXT is expanding its range of sustainable mobility offerings on the ONE platform.**
- **SIXT will ensure its branches and locations operate in a climate-neutral manner as quickly as possible.**



### 3.3 *Our principles governing responsible cooperative relationships*

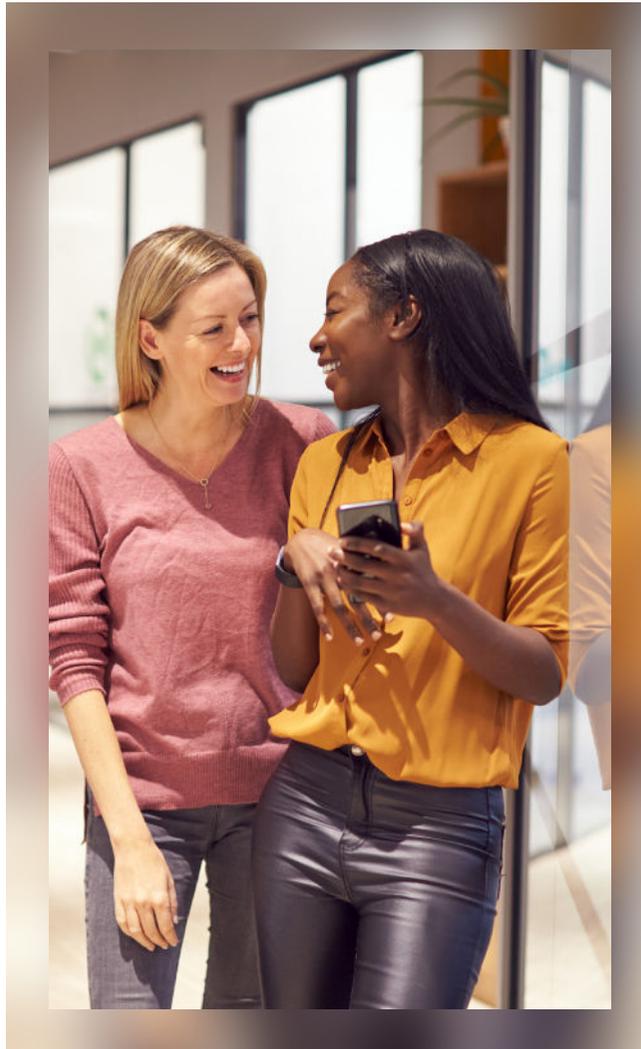
**We do not tolerate any form of discrimination.** We promote diversity and individuality and explicitly oppose discrimination of any kind based on gender, race or ethnic origin, age, religion, beliefs, sexual orientation or disability.

**We respect the personal rights of all employees** and guarantee an environment free from physical, verbal, sexual or other types of harassment, victimization or bullying.

This not only applies to the way all employees treat each other, but also to all behaviour towards partners, customers and third parties.

### 3.4 *Product safety*

**The safety and health of customers, business partners and employees** are our top priority, together with preventing negative environmental impacts. We diligently strive to minimise these risks. Our main focus is on the condition of our fleet of vehicles, and we ensure that the modern fleet is in a flawless and roadworthy condition.



### 3.5 *Data protection - handling data*

**Data protection plays a central role for SIXT.** Today, information exchange and business transactions around the world are primarily conducted electronically. The advantages afforded by electronic communication for working individuals and the business success of the company are offset by increased risks related to protecting personal rights and freedoms and data security. Minimising such risks is the responsibility of management, the data protection officer and each individual person.

We only process personal data to the extent permitted by law. We keep data secure and protected against unauthorised access and transmission. This also applies to the exchange of personal data between companies in the SIXT Group.

The way in which data is used is made transparent to data subjects. We always protect their legal rights to access, correction, objection, restriction of processing, portability and erasure.

All employees are bound to secrecy concerning confidential internal and other protected information that is not intended to be made public. The duty to observe secrecy applies beyond the end of the employment relationship.



### **3.6** *Political advocacy*

As an international company, SIXT comes in contact with a wide variety of cultures, jurisdictions and political systems. As a participant in the global economic system, we play an open and fact-based role in shaping political discourse, such as by taking part in forums or via memberships in associations. SIXT stands for transparency and compliance with the law.

### **3.7** *Volunteer work*

**SIXT supports social and charitable projects.** We support children worldwide through our participation in a large number of aid projects via the company-wide CSR programme “Drying little Tears” in cooperation with the Regine Sixt Children’s Aid Foundation.

At the same time, SIXT encourages and expressly supports its employees to be involved in voluntary work. Interested employees can, for example, spend one day a year supporting children’s aid projects run by the Regine Sixt Children’s Aid Foundation during their working hours. Colleagues around the globe have been making the most of this opportunity with great enthusiasm for years.



**4.**

*SIXT promotes a responsible approach to its  
**business relationships***

## 4.1 Customer relationships

**SIXT is a premium service.** We don't just want to satisfy customers: we want to inspire them. In everything we do, we therefore place the needs of our customers at the centre of our actions and treat customers with the utmost respect. We are receptive to criticism and strive to find the best possible solutions at all times.

## 4.2 Antitrust law and fair competition

**SIXT is committed to the principles of the market economy. No exceptions.** Fair competition is a basic requirement for free markets to develop and for society to

receive the resulting benefits. This principle promotes the development of innovative products and services. Antitrust law protects this competition. Therefore, compliance with the provisions of competition law by all our employees and executives is one of our most important basic guiding principles.

When competing in tenders for orders and for market share, every SIXT employee must comply with the rules of antitrust law. The most important basic rule of antitrust law is: any communication with competitors regarding the market, especially with regards to prices, offers, trade secrets, strategies or customers, is strictly prohibited.

No such contact should be sought with competitors to these ends, including by engaging in informal discussions outside of official events or entering into a formal agreement. It is prohibited to coordinate behaviour in any manner, to communicate or accept any information about prices, trade secrets and future behaviour. Even the mere appearance of a violation should be avoided.

SIXT wants to drive fair competition through honest performance, and under no circumstances does it wish to improperly manipulate the market. If SIXT employees are unsure about their actions within the framework of the competition law regulations, they must consult the Sixt Group legal department for an assessment.



## 4.3 Corruption prevention, conflicts of interest, gifts and entertainment

**SIXT is committed to fighting bribery and corruption.** Corruption is a global problem that causes immense economic damage and endangers free competition. SIXT stands for fairness and integrity and therefore takes a clear position on combating corruption. Therefore, we have implemented a large number of regulations and measures to prevent corruption. We expect the same of our business partners.

**SIXT is committed to objective decision-making** Conflicts of interest can cause doubts about the quality of decisions and the integrity of the person involved. All employees are therefore obliged to make business decisions in the best interests of SIXT and without regard to personal interests.

Situations in which the other interests of employees could create a conflict of interest and thereby impair their impartiality must be avoided.

All our actions are based on compliance with the law, and purely rational reflection. Personal benefits, whether monetary, in kind or otherwise, may never play a role in this.

**SIXT guarantees fairness.** Offering or granting benefits of any kind to people or companies with whom SIXT maintains or would like to establish a business relationship in order to unfairly influence the business decisions of these people or companies is not permitted. There is also a similar policy of no tolerance for accepting or demanding such benefits. Decisions may only be made on the basis of objective criteria (e.g., quality, price, technological status and the reliability of the business partner).

**SIXT does not accept the granting or acceptance of unfair gifts.** Gifts of cash or cash equivalents are always prohibited. The ban on accepting or granting benefits not only applies to direct financial benefits, but also to other benefits that could call the decision-maker's objectivity into question, such as invitations to expensive or inappropriate events and gifts.

Employees must therefore always reject benefits that go beyond the scope of reasonable and customary business practice. We help our employees to assess what is appropriate and customary, e.g., by naming value limits. Regardless of their value, benefits are only permissible if no party wishes to gain an unfair advantage from them, such as, for example, during tenders. These principles apply, for example, to meals or events, occasional gifts and other small benefits.

Employees must exercise particular restraint in their interactions with public officials and elected representatives: No gifts, benefits or invitations of any kind may be extended to officials, judges, politicians or other representatives of public institutions as well as members of parliament.

In cases of doubt, employees must contact the SIXT compliance officer.





## 4.4 Donations and sponsorships

**SIXT sees its donations as voluntary services.** The company earmarks a certain amount of donations in the form of money, benefits in kind or time. We exclusively make donations to non-profit, charitable, benevolent or social causes championed by recognised organisations and projects that have proven themselves, and they are governed by precise internal procedures. Donations to political parties, associations or politicians are only permitted in strict compliance with the applicable laws and reporting requirements and always require the prior approval of the Management Board or executives at national subsidiaries.

## 4.5 Sanctions and money-laundering prevention

**SIXT helps combat money laundering and terrorist financing.** As a global company, we comply with national and international economic sanctions and support the international community in the fight against money laundering and terrorist financing. Money laundering seeks to disguise the origin of assets that were earned from criminal activities by giving them the appearance of legality by injecting them into the legal economy.

It is SIXT's declared goal to only maintain business relationships with customers and business partners whose business activities are in compliance with legal regulations and whose funds are of legal origin. We therefore always verify the identity and integrity of our customers and business partners (by following the know-your-customer principle). Suspicious customers, business partners or transactions must be reported to the compliance officer immediately.





## **4.6 Tax and customs regulations**

**SIXT adheres to tax and customs regulations.** At the same time, it is our legal obligation and part of our social responsibility to comply with tax and customs regulations at a national and international level. SIXT and the employees of SIXT are aware of the legal consequences of illegal behaviour. Our business processes are therefore designed to ensure that all taxes and customs duties to be paid are correctly, completely and punctually recorded internally and paid to the responsible public authorities. In general, the company does not utilise any aggressive or even illegal tax avoidance models. Our strict commitment to a sustainable corporate policy is not compatible with an aggressive tax-avoidance policy.

## **4.7 Responsible selection procedure for business partners**

**The Code of Conduct is the basis for every business relationship with SIXT.** For us, it is not only essential that our employees adhere to the Code of Conduct and the values conveyed therein. We also expect our business partners, such as suppliers and sales partners, to respect these values and uphold them in their own business dealings.

We refuse to work with business partners who, for example, utilise forced or child labour or who discriminate against employees. In order to ensure that our expectations are met, we monitor our business partners with regard to possible problems in dealing with our standards and legal requirements. We also expect our business partners to adhere to these requirements after the contract has been entered into. Suppliers undertake to base their actions and those of their employees on these ethical standards and to reflect on them on an ongoing basis. We expect our business partners to, in turn, require their own suppliers to comply with and observe these principles. In the event of potential violations by business partners, we will take appropriate action to mitigate and resolve the violation with the business partner.



**5.**

***SIXT is a responsible  
employer***

## 5.1 Health and safety

SIXT offers its employees a safe and healthy working environment. We comply with all legal regulations and create a workplace in compliance with the applicable provisions for the prevention of accidents and impairment to health. Protecting the health of our employees is of the utmost importance. We provide regular training to our employees, issue standard operating procedures that are based on the corresponding risk analyses and monitor the implementation of such procedures. All supervisors are required to recognise grievances and to remedy them as quickly as possible.

SIXT also expects its business partners to place an appropriate value on safety, health and fair working conditions.

## 5.2 Work-life balance

Being a commercial enterprise SIXT strives for good performance and returns. At the same time, our corporate culture is based on trust and respect. This also includes giving all our employees a high degree of flexibility and personal responsibility wherever possible. This applies in particular to allowing employees to strike a balance between work and private life.



## 5.3 Public presentation (including social media)

SIXT values transparent communication that gives credit where credit is due. The professional appearance of SIXT in public, on social media (Facebook, Twitter, LinkedIn etc.), on the Internet and on e-platforms constitutes an essential part of our brand and a driver of our business success as a mobility provider and employer.

Improper use of these forms of communication can have serious consequences for both SIXT and individual employees.

Speaking on behalf of SIXT or brands belonging to SIXT is therefore only permitted after prior consultation with the responsible departments. Personal representations by employees that bring our reputation or the reputation of our employees into disrepute will not be tolerated.

Unauthorised data access to another user's SIXT email account, unauthorised transmission of secret or confidential information, sending of objectionable materials or messages, transmission of materials infringing the copyrights of third parties and other illegal or unethical activities are prohibited.

## 5.4 Management of operational resources, trade secrets and intellectual property

SIXT secures its sensitive information and protects its business secrets. SIXT provides employees with the resources they need to perform their tasks efficiently. Accordingly, all SIXT employees ensure that they use the resources provided responsibly and not wastefully. Unless expressly agreed otherwise, these resources may only be used for company purposes. Misuse for other purposes, especially inappropriate personal, illegal, or other unauthorised purposes, is prohibited. Our employees strive to act as sustainably as the respective activities allow while also conserving resources as much as possible.

One of SIXT's most valuable assets is the inventiveness of our employees. SIXT has important intellectual property rights and licenses, such as copyright and trademark rights, for example. In addition, SIXT has a large amount of confidential information. Each of our employees must protect the interests of SIXT, including in particular by protecting intellectual property and other trade secrets, documents and data carriers from unauthorised data access and use by third parties.

SIXT, all executives and our employees respect and honour the intellectual property of others. Unauthorised use of third-party intellectual property, i.e., use without licensing or the consent of the owner of the property rights, may not only result in significant claims for damages against SIXT and possibly also the person committing the violation, but

also criminal consequences for the person committing the violation, other employees and/or bodies of SIXT. We are aware of this, and our employees know that in cases of doubt, they must consult with the legal department.



## 5.5 Insider trading and ad hoc publicity

### **SIXT is committed to fair securities trading practices.**

The misuse of insider information is prohibited, and we will do what is necessary and reasonable to prevent insider trading at our company.

As a listed company, SIXT SE must publish insider information immediately using a so-called ad hoc announcement. Until the information in question is published, it may not be passed on without authorisation or used to trade securities or other financial instruments.

Insider information is specific information about circumstances that are not publicly known, which relates to SIXT or another issuer of securities and which is likely to have a significant impact on the stock exchange or market price of the securities if it becomes public knowledge. Insider information may include, but is not limited to, financial results, plans and budgets, dividend changes, mergers or acquisitions, contract awards, strategic planning, litigation history, changes in governance and joint ventures or business relationships and agreements.

Violations of this insider information policy may be severely sanctioned as a criminal offense and lead to the assessment of administrative fines or penalties as well as

civil liability. Until it is published, this insider information may only be made available to people who need this information to perform their job duties. Anyone who has insider information may not trade, either personally or through third parties, in securities or other financial instruments that could be affected by this confidential information.

If there is any doubt as to what constitutes insider information, our employees know to contact the legal department first.

## 5.6 Employee secondary employment

**SIXT avoids conflicts of interest created by employee secondary employment through the adoption of clear regulations.** Secondary employment, whether paid or unpaid, is no longer an unusual arrangement in the modern working world, and these arrangements offer, among other things, personal development and career advancement opportunities. Employees must always report paid secondary employment, and these arrangements may only be entered into with prior written consent. A secondary employment relationship may be prohibited if the employee will be working directly for a company that they come into contact with as part of their job duties at SIXT. Consent that has already been granted may be revoked if such conflicts of interest arise or become known later. SIXT's consent does not need to

be obtained for occasional activities, such as presentations, articles in journals or other literary activities as well as charitable activities.

Activities on a management board, supervisory board, advisory board or similar mandates at a commercial enterprise must also be reported in advance.

## 5.7 Company shareholdings

**SIXT supports the participation of employees in the capital market.** All SIXT employees may acquire and hold shares in companies without reservation. However, they may only hold shares and participate in business partners or competitor companies provided this is on a small scale and the risk of a conflict of interest is excluded. The employee may also not attempt to circumvent this regulation by purchasing shares through a third party. Any significant investments in business partners or competitor companies must be reported to the compliance officer.

**6** ■

***SIXT takes responsibility for  
ensuring compliance  
with and enforcement  
of the Code of Conduct***





## **6.1** *Scope of the Code of Conduct*

This SIXT Code of Conduct applies to all areas where we are active. We strive to behave ethically, socially, and fairly in all that we do. The Code of Conduct applies to all employees, supervisory bodies, and executives. They undertake to implement the Code worldwide. This is a general set of rules that can be elaborated further in internal policies or standard operating procedures but may not fall below these minimum standards.

All employees are familiarised with the Code of Conduct and other relevant internal specifications and their practical implementation in writing, via the intranet and through training programmes. We also expect that our business partners know and comply with the behavioural principles laid down in the Code of Conduct. Whoever does not share the principles listed in this Code of Conduct cannot be our business partner.

## **6.2** *Implementation of the Code of Conduct*

We regularly check compliance with the law and compliance with the Code of Conduct at all companies of our group worldwide. A compliance organisation was created for this purpose, and a compliance officer is appointed by the Management Board of SIXT SE.

Violations of rules under the Code of Conduct may entail serious consequences for SIXT, as well as consequences for the wrongdoer under labour law. If, in addition to violating the Code of Conduct, applicable law is also violated, the employee may also be held liable in accordance with the relevant statutory regulations.

## **6.3** *Responsibility at management level*

SIXT relies on its employees acting responsibly. We therefore expect all of our executives to do justice to their job duties by exhibiting exemplary behaviour with integrity. They are responsible for recognising grievances and violations in their area of responsibility and beyond, remedying them and, if necessary, reporting them to management or the compliance office.

They should act as a role model to all their employees and create an open, trusting and respectful environment.

## 6.4 Assistance/contact information/ whistleblower system

The Code of Conduct can only be implemented successfully if grievances are communicated and addressed openly and clearly. Together we can protect our company by addressing what is wrong. We will also protect anyone who helps investigate and stop misconduct and rule violations. We will not tolerate retaliation of any kind against anyone who has filed a complaint or provided information.

At the same time, we will safeguard the interests of those affected. They are assumed to be innocent until proof of a violation is presented.

We would therefore like to expressly encourage all employees to fulfil their duty and immediately report any violations of this Code of Conduct. Employees can submit reports through a variety of channels.

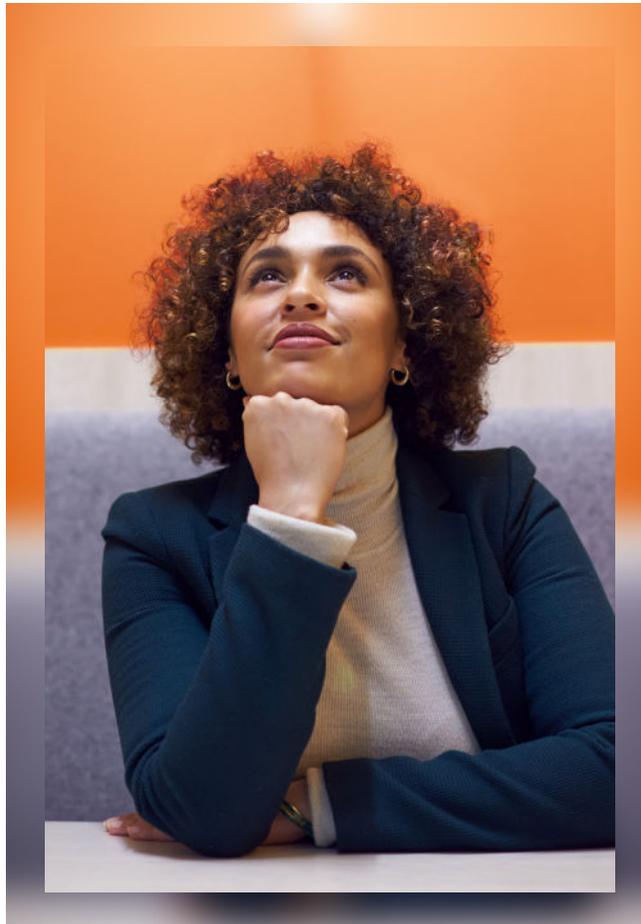
- **Supervisor:** The first point of contact is the employee's respective supervisor. This person must investigate possible misconduct and decide on what additional steps to take.
- **Compliance officer:** SIXT has appointed an internal compliance officer who receives information and initiates investigations in the event of violations, coordinates them and initiates countermeasures. This person is primarily responsible for the content and monitoring of the implementation of this Code of Conduct and assumes an initial arbitration function.

Employees can contact the compliance officer at any time if they have information to report. The compliance officer guarantees the highest level of confidentiality.

Employees may find the name of the compliance officer and their contact details on the SIXT intranet, or

they can be reached at the following email address: [compliance@sixt.com](mailto:compliance@sixt.com)

- **Whistleblower system:** In addition, references to rule violations can be reported via the SIXT whistleblower system. The reporting person can remain anonymous or state their identity. The whistleblower system can be accessed as follows: <https://sixt.integrityline.com>



The whistleblower system is also available to external parties, and it also provides the opportunity, for example, to report risks related to human rights or environmental issues and the violation of obligations related to human rights or environmental issues at SIXT or at any direct or indirect supplier of SIXT.

The external reporting offices in compliance with the EU policy for whistleblower systems can be found on the websites of the respective SIXT national subsidiaries, provided that applicable law so provides in their jurisdictions.

- **Ombudsperson:** Employees may also submit tips anonymously to the SIXT ombudsperson. SIXT has appointed an external lawyer as its ombudsperson. As a lawyer, the ombudsperson is subject to the statutory duty of confidentiality. The ombudsperson receives confidential information about possible violations of the Code of Conduct and legal provisions, examines them and evaluates the type and severity of the violation or suspected violation as well as the possible consequences for third parties and SIXT. The ombudsperson forwards the result of their review to the compliance officer, all without naming the reporter, of course. The compliance officer informs the ombudsperson about how the report was followed up on and what was the result. In the interest of maintaining the confidentiality of the relationship between the reporter and the ombudsperson, SIXT will refrain from requesting information from the ombudsperson that would allow the reporter to be identified. Employees can find the name of the ombudsperson and the contact details on the SIXT intranet.



**EXPECT BETTER!**