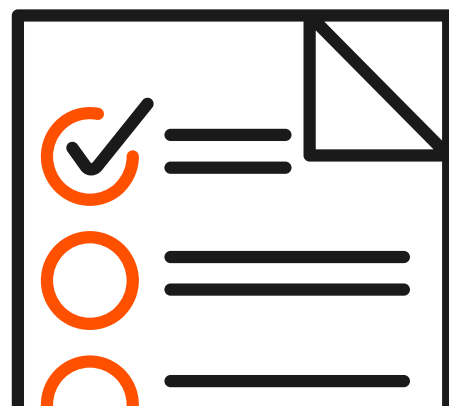
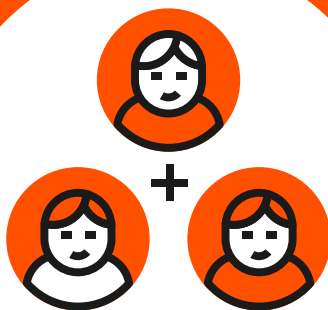




# CODE OF CONDUCT

**FOR SUPPLIERS AND SERVICE PROVIDERS**



The Sixt Group (“SIXT”) is an international premium provider of mobility solutions. Together with our network of licensees and partners, we are able to offer our services to customers across the globe. SIXT attaches great importance to responsible and sustainable value creation in its entire range of services. We owe our success to excellent business policy as well as legally compliant and ethically impeccable behaviour. This is essential for gaining and deserving the trust of our customers, Suppliers, shareholders and business partners.

The behavioural principles of SIXT and its employees are defined in the Code of Conduct of SIXT that transparently communicates what management expects of its employees and partners. This Code of Conduct is supplemented by our Policy statement on our human rights strategy. The Policy statement and the Code of Conduct of SIXT are published on our website: <https://about.sixt.com/en/responsibility/#compliancee>

We expect that our Suppliers follow the same principles, embrace the spirit of these principles and promote them as actively as we do. We do not work with business partners who tolerate forced labour or child labour, discriminate against employees, violate legal requirements or breach fundamental ethical principles.

SIXT has therefore issued this Code of Conduct for Suppliers that lays down the fundamental principles of SIXT as well as defining minimum standards for business relations with SIXT SE and any of our Group companies.

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## SCOPE OF VALIDITY

This Code of Conduct applies to all our Suppliers and is applicable to all areas in which they are directly involved. Our Suppliers undertake to act in an ethical, socially responsible and fair manner.

They undertake to implement the Code worldwide and they may not deviate from these rules even if different standards are usual or are tolerated in another country.

SIXT attaches great importance to taking responsibility for human rights and the environment and expects the same of its Suppliers. Every Supplier thus undertakes to adhere to the following principles.

### 3.1 HUMAN RIGHTS AND ETHICAL STANDARDS

**SIXT promotes compliance with internationally recognised human rights.**

Suppliers undertake to adhere to:

- 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 UN Civil Pact (in particular on occupational safety)
- the ILO Core Labour Standards, and
- the OECD Guidelines for Multinational Enterprises.

### 3.2 PROHIBITION OF CHILD LABOUR AND (MODERN) SLAVERY

**SIXT tolerates neither child labour nor any kind of forced labour.**

Suppliers are prohibited from using or supporting child labour in any possible way. This will not be tolerated by SIXT. We are committed to protecting children and allowing them to develop in an undisturbed and healthy manner. Suppliers are obliged to observe, in particular, the two basic ILO conventions on child labour, i.e. No. 138 on Minimum Age and No. 182 on Worst Forms of Child Labour. Suppliers must define a minimum working age of 15 even if it would be legal to employ younger children in accordance with local regulations. Suppliers must prohibit employees under the age of 18 from carrying out dangerous activities that could be hazardous to their health or safety.

Suppliers may not use any form of forced labour, debt bondage, involuntary labour or other kinds of modern slavery. Labour must always be provided voluntarily. Punishment, physical and/or psychological coercion and all other forms of human trafficking are prohibited. Employees must be allowed to maintain control of their identification documents (e.g. passport, work permit as well as all other personal legal documents).

### 3.3 DISCRIMINATION

**SIXT welcomes everyone.** Suppliers do not tolerate any discrimination or unequal treatment. Corporate conduct may not be influenced by origin, religion, skin colour, gender, age, nationality, sexual orientation, disability or political opinion. Suppliers undertake to implement appropriate measures and to ensure that these are observed at all their sites and in all business areas.

### 3.4 REMUNERATION AND WORKING TIMES

**SIXT expects fair remuneration and reasonable working times.** Suppliers must observe all national legal provisions and binding industry standards with respect to working times. In the absence of national provisions, the international ILO standards apply. Suppliers must pay their employees no less than the minimum wage as laid down by law and applicable collective wage agreements and in accordance with industry standards.

### 3.5 WORK SAFETY

**SIXT is committed to providing a safe and healthy work environment.** SIXT expects that its Suppliers fully comply with all relevant legal provisions, and that they create a working place in accordance with the applicable provisions aimed at preventing accidents and work-related health hazards. SIXT expects that its Suppliers provide regular training to their employees, issue standard operating procedures that are based on the corresponding risk analyses and monitor the implementation of such procedures.

### 3.6 FREEDOM OF ASSOCIATION

**SIXT respects employee rights.** Suppliers undertake to respect the right of employees to form and join associations of any type, to carry out collective bargaining and to strike.

### 3.7 ENVIRONMENTAL PROTECTION

**SIXT acknowledges the need to act in a climate-conscious and environmentally friendly manner.** Suppliers undertake to behave in an environmentally friendly and climate-conscious manner and to observe the applicable laws, conventions and regulations that were issued to protect the environment. Suppliers especially commit to comply with following prohibitions:

- Ban on the manufacture, use or treatment of mercury or products containing mercury;
- Ban on the production or use of particularly harmful pollutants (cf. Art. 3 Para. 1 POPs Convention, 6 Para. 1 lit. d) POPs Convention); and
- Ban on the import and export of hazardous waste in accordance with the Basel Convention.

Suppliers are prohibited from causing any harmful soil change, water pollution, air pollution, noise emission or excessive water consumption that harms the health of a person, significantly impairs the natural bases for the production of food or denies a person access to safe and clean drinking water or sanitary facilities.

SIXT furthermore expects that resources such as energy, water and raw materials are used efficiently and responsibly and that Suppliers establish and apply an appropriate environment and energy management system.

### 3.8 TREATMENT OF CONFLICT RESOURCES

**SIXT does not accept any supplies from conflict-affected areas.** Suppliers undertake to take adequate measures in order to prevent that raw materials from conflict-affected or high-risk areas that contribute to human rights abuses are used in its products.

### 3.9 ANTI-CORRUPTION

**SIXT is fully committed without reservations to integrity and transparency in the competitive environment.** Suppliers must observe all applicable national and international anti-corruption laws and must refrain from any type of corrupt conduct or acts that could be interpreted as such. Suppliers may not offer, promise or grant illegal benefits to public officials or decision-makers in the private sector in order to obtain preferential treatment or a favourable decision in the public or private sector. This must also be observed when dealing with donations, gifts or invitations.

Suppliers may not allow any illegal benefits to be promised or offered to it by third parties and may not accept any benefits if it creates or could create the impression in the mind of the person granting the benefit that they could influence a Supplier's business decisions in this way.

### 3.10 COMPETITION

**SIXT is committed to the principles of the market economy.** Suppliers must adhere to the rules of free and fair competition and, in particular, may not violate any competition or antitrust laws.

### 3.11 MONEY LAUNDERING

**SIXT supports the combatting of money laundering and terrorism.** Suppliers must take all required measures within their sphere of influence to prevent money laundering and terrorist financing.

### 3.12 OTHER PRINCIPLES

The supplier respects the prohibition of illegal evictions and illegal acquisition of land. If the supplier commissions security forces, the supplier ensures that they are selected and monitored and that they observe the rights and standards set out in this Code of Conduct.

## IMPLEMENTATION OF AND COMPLIANCE WITH THE PRINCIPLES

We expect that our Suppliers and their affiliated companies are familiar with all the behavioural principles laid down in this Code of Conduct and that they implement them autonomously. Whoever does not share the principles listed in this Code of Conduct cannot be our business partner.

We also expect that our Suppliers and their affiliated companies 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 that you pass on the obligations and standards from this Code of Conduct to your suppliers and that you obligate them to pass them on as well. As a supplier, you undertake to take appropriate measures vis-à-vis your suppliers to check and enforce these principles, as well as to identify, avoid and mitigate corresponding risks (e.g. with a risk management system, and with the implementation of (processes linked to) preventive and corrective measures).

To maintain these standards, we perform risk-based checks of our Suppliers. We expect that you inform us without delay if the principles laid out in the foregoing are not adhered to with regard to our business relationship. In case of any suspected violation of the above obligations, SIXT is authorised to request appropriate information from the Supplier regarding the Supplier, its affiliated companies and their respective suppliers, and to carry out checks at the Supplier and its affiliated companies (including any production facilities) regarding compliance with this Code of Conduct, or to have them carried out by third parties.. A material violation of these principles may give rise to the right to terminate the contract in accordance with the provisions of such contract. This does not affect any other contractual remedies we might have.

The Code of Conduct can only be implemented successfully if grievances are communicated and addressed openly and clearly. Indications of any misconduct can be reported through the SIXT whistleblower system either anonymously or by stating the identity of the reporting person. The whistleblower system can be accessed as follows: <https://sixt.integrityline.com/>

The whistleblower system is available to SIXT employees as well as Suppliers and other third parties and provides the opportunity 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. Suppliers ensure that no actions are taken that could prevent employees from using the SIXT whistleblower system.

SIXT expects its Suppliers to also create appropriate complaints options.

Upon signing this document, the Supplier accept this Code of Conduct as being applicable to all business relations with SIXT and ensures that its affiliated companies also comply with it in the context of business connections with SIXT.

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Company name

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Name and position of the authorised representative(s)

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Date

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Signature(s)