

PUBLISHED BY

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© BMW AG, April 2023

BRC-EN-EXT-202304

WE ARE COMPLIANCE
**BMW GROUP BUSINESS
RELATIONS COMPLIANCE**



ROLLS-ROYCE
MOTOR CARS LTD

"Responsible and lawful conduct forms the basis for the joint success of the BMW Group and its business partners."

Oliver Zipse, on behalf of the Board of Management of BMW AG



RESPONSIBLE AND LAWFUL CONDUCT AT THE BMW GROUP

Lawful conduct and fair competition are vital to the long-term business success of the BMW Group. They create a basis of trust for our relations with customers and business partners.

LAWFUL CONDUCT LAYS THE FOUNDATION FOR THE SUCCESS OF THE BMW GROUP

As a globally-successful company, the BMW Group is highly-regarded by its customers, shareholders and business partners. Lawful conduct and fair competition are essential for securing the long-term success of the company. A single violation of the law, on the other hand, can result in serious financial consequences and cause lasting damage to the BMW Group's reputation. This would significantly weaken the BMW Group's standing as a supplier of premium products and services.

CORRUPTION AND ITS CONSEQUENCES

Corruption poses a particularly high risk. It threatens fair competition, since it rarely allows the best supplier a fair chance. This can hinder technological development and future projects. For that reason, the BMW Group is fully determined to combat corruption and promote fair competition. This position stems from the BMW Group's basic principles and defines the binding framework for the actions of BMW Group executives and all of its employees.

THE BMW GROUP COMPLIANCE ORGANIZATION

For the protection of the company and its employees, the BMW Group established instruments and measures to prevent violations of the law – and corruption, in particular – several years ago. Fulfillment of the associated compliance requirements is binding for all BMW Group employees.

BMW GROUP BUSINESS RELATIONS COMPLIANCE

The BMW Group works with a global network of business partners from different legal and cultural backgrounds. To operate successfully, the company must have confidence in the integrity of its business partners and the reliability of its business relationships.



COMPLIANCE AS A JOINT RESPONSIBILITY

We pursue our corporate goals in accordance with the principle of effective competition and compliance with applicable local and international regulations. We expect the same from our business partners – because integrity is an essential condition for reliable longterm business relations.

BUSINESS TRANSPARENCY

BMW Group business partners are therefore prohibited from offering, promising or guaranteeing BMW Group employees, other business partners or public officials, advantages which might exert undue influence on these parties. Nor may advantages of this kind be requested or accepted. Even the slightest appearance of a violation of the law or anti-competitive behavior should be avoided.

The term "public official" is used in the broadest sense. It refers to all individuals who perform public functions, e.g. civil servants, public sector employees, and members of the government, as well as elected officials and members of international organizations.

FAIR COMPETITION

Anti-trust infringements impede fair competition, as well as corruption. One of the most important fundamental antitrust rules is that competitors must not conclude market-related agreements, especially with regard to prices, bids, terms and conditions, production programs, sales quotas, and market share. Price maintenance and abuse of market power are also inadmissible.



COMPLIANCE DUE DILIGENCE IN BUSINESS RELATIONS

The BMW Group's business partners undergo a thorough Compliance Due Diligence. This lays the foundation for reliable long-term business relations.

The BMW Group implements a structured Compliance Due Diligence process for business partners in specific business relationships. This is particularly relevant for sales partners and key accounts, but also for service providers such as agencies and consultants.

As part of this process, all relevant business relationships are examined and assessed for typical compliance risks. Decisions are based primarily on publicly available information and, in some cases, information obtained directly from the business partner concerned.

This approach creates the degree of transparency needed to be able to evaluate potential risks in business relations.

WORKING TOGETHER TO PREVENT COMPLIANCE RISKS

Depending on the outcome of the Compliance Due Diligence, we work with our partners to minimize potential legal and reputational risks in our business relations.

BUSINESS RELATIONS BASED ON INFORMED DECISIONS

Based on the outcome of the Compliance Due Diligence, an informed decision to enter a business relationship is made as part of the approval process. Depending on the type of business relationship and the risks identified, approval may be valid for a period of between one and five years.

MEASURES TO REDUCE COMPLIANCE RISKS

Compliance Due Diligences may identify potential compliance weaknesses. In these cases, specific measures are taken to minimize risks.

A wide range of compliance measures can be adapted to the specific situation of each business partner. These include, for example, communications resources and training as well as possible monitoring measures.

JOINT RESPONSIBILITY BETWEEN THE BMW GROUP AND ITS BUSINESS PARTNERS

The BMW Group expects its business partners to guarantee a binding responsibility for preventing violations of the law and to take an active role in implementing agreed compliance measures. This is a special responsibility for the management of our business partners. We expect them to make a clear and lasting commitment to preventing violations of the law.

The aim of this joint effort between the BMW Group and its business partners is to create a lasting foundation for shared business success through responsible and lawful conduct.



WE ARE COMPLIANCE

Further information on the BMW Group Compliance Organization can be found at www.bmwgroup.com/compliance

BMW GROUP COMPLIANCE CONTACT

For Compliance related questions, the BMW Group Compliance Contact is available from Monday to Friday from 7:00 a.m. to 8:00 p.m. (CET):

Telephone: +49 89 382-60000

Email: compliance@bmwgroup.com

BMW GROUP SPEAKUP LINE

Business partner can report possible violations of the law in connection with the BMW Group business relations anonymously and confidentially via the BMW Group SpeakUP Line. The BMW Group SpeakUP Line is available throughout the day in a total of 34 languages in all countries in which the BMW Group operates via local, toll-free numbers [**BMW Group SpeakUP Line Access Data**].

OMBUDSPERSON

You may also can contact our **ombudsperson** for reporting notifications:

Dr. Sybille von Coelln

Telephone: +49 211 44 03 57 72

Fax: +49 211 44 03 57 77

Email: BMW-Ombudsperson@hvc-strafrecht.de

Postal address: HEUKING · VON COELLN, Rechtsanwälte PartG mbB, Prinz-Georg-Straße 104, D-40479 Düsseldorf

