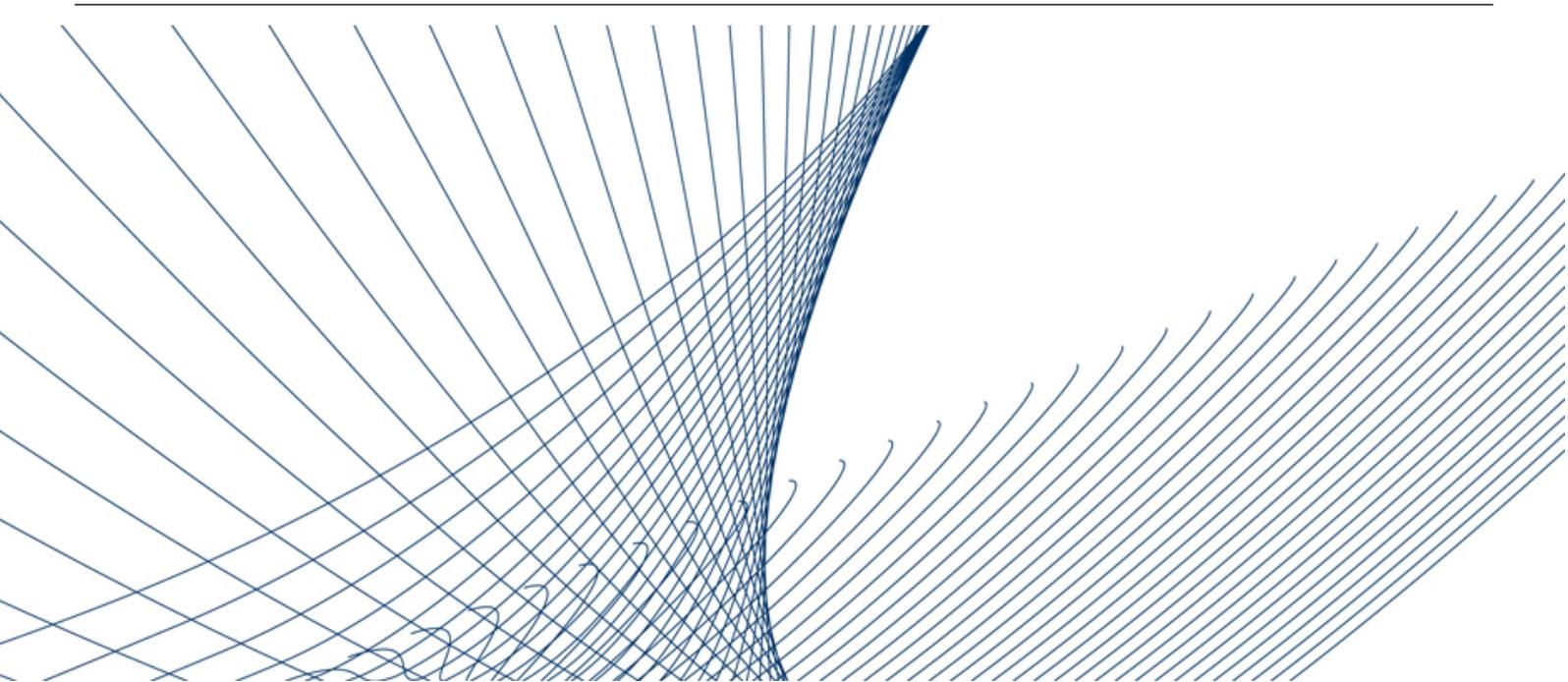


# VOLKSWAGEN

AKTIENGESELLSCHAFT



## Principles and Guidelines for Political Lobbying

## Preface

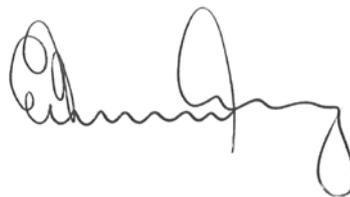
Volkswagen is one of the world's leading automobile manufacturers and the largest in Europe. With 12 brands from seven countries, more than 10 vehicles, more than 100 production facilities in 27 countries, and nearly 600,000 employees, the Volkswagen Group's sphere of action is global.

Our actions have an impact on society and the environment, and we work daily to ensure that this impact is positive, and to minimise any negative effects. It is our mission to create lasting values for customers, employees, shareholders, neighbours and partners, and to contribute to sustainable development around the world.

Volkswagen operates in a complex and highly-regulated environment. The Public Affairs and Sustainability department acts as a mediator between the company and politics, i.e. parliaments, governments and authorities as well as political parties, associations and non-governmental organisations. The objective of political lobbying is to establish and to maintain the company's scope of action and to keep the decision-makers in politics and society informed.



Matthias Müller



Dr Thomas Steg

This document defines the principles and guidelines of the Public Affairs and Sustainability department (in the following: Public Affairs) in relation to political lobbying.

## Role and responsibilities

The Public Affairs department introduces the company's positions, its knowledge and experience into the legislative and administrative decision-making process by providing comprehensive information and reliable and competent advice. Our reputation is founded on credibility and professionalism. The Public Affairs department also contributes its own suggestions and stimuli for a sustainable policy as regards industry, transport, the environment and society, as well as offering advice regarding the development and focus of government innovation strategies.

In dialogue with stakeholders, Public Affairs contributes to raising the company's profile as a socially responsible player and improving its reputation. The aim is to maintain stable and balanced relations with all stakeholders.

Within the company, Global Government Affairs fosters a culture of open dialogue and the dismantling of barriers to communication with both politics and non-governmental organisations. It examines and collects information, analyses its relevance, and drafts differentiated strategies for the company.

## Networks

In addition to the Public Affairs department of the Volkswagen Group, the brands and regions also maintain corresponding departments. The internal network further includes representations and offices in several capital cities worldwide.

The external network covers numerous memberships, delegations and commitments in industrial and trade associations, sustainability initiatives, and other organisations active at national, European and international level. Collaborations with non-governmental organisations complement the network of Public Affairs.

## Approach to transparency expectations

Public Affairs acts according to the principles of openness, transparency, and responsibility. The department's structure and key memberships are therefore published on the Group website.

Volkswagen is registered in the transparency register of the European Union and complies with the associated guidelines. The Group Representation Brussels publishes details of the structures, resources, and objectives of political lobbying at European level.

## Contact with parties, office holders and elected officials<sup>1</sup>

All contacts with office holders and elected officials strictly comply with the law as well as with internal regulations aimed at avoiding conflicts of interest and corruption.

Neutrality in contacts with political parties and interest groups is a matter of course for Public Affairs. As a general rule, we are open to dialogue with representatives of all political parties. However, we do not host any events with a public profile which involve politicians at our sites during the three months immediately preceding an election.

## Events

Public Affairs engages in dialogue in many ways, including the organisation of information events. The purpose of these events is to provide information about the company's strategy and objectives, to argue for political positions, and to discuss conceptual solutions to social challenges.

Regardless of the type of event, the activities organised by Public Affairs (hospitality, brochures, giveaways) are always appropriate and comply with the relevant legal principles and company guidelines and policies.

The exchange on topics of a technical and business character is central to these events.

Further information on the event formats is published on the Group website.

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<sup>1</sup> For reasons of improved legibility, both genders are not listed in many instances. It can be assumed that both genders are being referred to. This linguistic convention has been used purely for purposes of editorial brevity and is not intended to convey any other meaning.

## Political sponsoring and donations

Modern democracy relies on a functioning party system. The existence of parties with deep roots in society is in the interest of industry and companies.

Volkswagen therefore supports parties across the democratic spectrum in Germany, for example. By doing so, the company is acting in accordance with the principles of political party financing as set out in the Basic Law of the Federal Republic of Germany. These principles require the parties to generate their own revenues in addition to the reimbursement of election costs by the state.

In principle, the Public Affairs department is willing to support democratic parties with the organisation of political conventions and similar events, and to place advertisements in party-affiliated publications as a platform for forming the political will in an appropriate and well-balanced way.

The department combines this support with the intention to raise public awareness for the company and its projects.

As a matter of principle, it ensures an appropriate balance between its own services and the contractually agreed consideration.

All sponsoring activities comply with the Volkswagen Group's Code of Conduct and the company's guidelines on corruption prevention.

To ensure transparency and verifiability, figures relating to support of political party events and to the advertising budget for party-affiliated publications are published on the Group website.

As a general rule, donations to political parties, party-affiliated institutions, or politicians are not made.

## Code of Conduct

Compliance with international conventions and the laws and regulations of the countries in which Volkswagen operates is a matter of course for all employees of the Public Affairs department. This is equally true for compliance with company regulations, our Code of Conduct, and in particular corruption prevention measures, and competition and antitrust law.

Volkswagen stands for respect, tolerance and open-mindedness. Public Affairs employees therefore solely use honest and legal means to fulfil their duties.

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