
 Overview

 Foreword

 Portrait

 Our approach

 Products

 Production

 Supply chain

 People

Society and integrity

■ Compliance and risk management

 Stakeholder dialogue

 Corporate citizenship

 Annex

RESPONSIBILITY FOR SOCIETY AND INTEGRITY

For MAN, there is a direct link between corporate responsibility and commercial success. In addition to responsible corporate governance and compliance with applicable laws, this also includes open dialogue with our stakeholders. Our corporate citizenship initiatives and MAN aid to refugees also enable us to make a lasting contribution to sustainable development.

COMPLIANCE AND RISK MANAGEMENT

MAN does not tolerate illegal or irregular conduct. Compliance with applicable laws and the Code of Conduct, our guiding principles for acting with integrity, is the basic precondition for the success of our business.

“Compliance and integrity are fundamental parts of MAN’s corporate strategy. All employees must be aware of their individual responsibility and make their contribution to fulfilling our corporate responsibility and having sustainable success, together. Compliance with laws, ethical values, and internal policies is a matter of course for everything we do — everywhere and at all times. When it comes to the infringement of the law, we live zero tolerance,” says Joachim Drees, Chief Executive Officer of MAN SE and MAN Truck & Bus SE and member of the Executive Board of TRATON SE.

Organization

As part of its responsibility, which is also set out in the German Corporate Governance Code, the Executive Board of MAN SE has established the Governance, Risk & Compliance (GRC) function.

This function is managed by the Head of GRC/Chief Compliance Officer of the MAN Group, who reports directly to the Chief Executive Officer of MAN SE as well as to the Audit Committee of the Supervisory Board. The GRC function is responsible for compliance, integrity, and risk management issues throughout the Group.

The Corporate GRC Office plays a central role in respect of compliance, integrity, and risk management activities. This includes, for example, drafting policies and regulations that apply throughout the Group as well as designing training sessions for employees. The Corporate GRC

 Overview

 Foreword

 Portrait

 Our approach

 Products

 Production

 Supply chain

 People

Society and integrity

■ Compliance and risk management

 Stakeholder dialogue

 Corporate citizenship

 Annex

Compliance and risk management

Office also manages risk management processes in the divisions and is responsible for further developing the risk management measures in cooperation with the risk/ICS (internal control system) managers.

The GRC teams at brand level are responsible for implementing the compliance management and the risk management system developed by the Corporate GRC Office in the Group companies of the divisions. Each division has a Head of GRC/Chief Compliance Officer who is supported by Compliance Officers and/or risk/ICS managers in the different business units and sales regions.

Finally, tasks relating to compliance, integrity, and risk management are also performed by Compliance Champions and risk/ICS coordinators. They are not full-time GRC employees, but rather MAN employees and managers who have taken on special responsibility for topics related to compliance, integrity, or risk management.

Elements of the MAN compliance management system

The MAN compliance management system addresses the topics of white-collar crime (in particular combating corruption, preventing money laundering, and terrorism funding) and antitrust law.

Code of Conduct

Ethical principles of conduct and fundamental compliance requirements for the MAN Group are laid down in the Code of Conduct. The Code also depicts the corporate values and establishes guidelines regarding integrity.

Reporting

At different Group levels, regular status reports on compliance measures are presented in the responsible committees.

Risk analysis

A specific risk analysis is carried out on a regular basis to identify potential compliance risks for the Group and to align and further develop the Group-wide compliance management system based on these risks.

Policies

The GRC Organization has also developed policies on compliance-related issues such as preventing corruption, antitrust law, and money laundering prevention. These policies represent uniform and binding requirements for all employees throughout the Group.

Business Partner Approval Tool

The Business Partner Approval Tool is used to check and approve the integrity of business partners providing sales support.

Compliance training

The GRC Organization conducts regular face-to-face and online training sessions on topics such as preventing corruption, antitrust law, and money laundering prevention.

Overview

Foreword

Portrait

Our approach

Products

Production

Supply chain

People

Society and integrity

 Compliance and risk management

 Stakeholder dialogue

 Corporate citizenship

Annex

Compliance and risk management

Compliance Helpdesk

All MAN employees can contact the Compliance Helpdesk by phone or e-mail to obtain answers to compliance-related questions. This gives the GRC Organization an overview of frequently asked questions in order to develop further preventive compliance measures as and when required.

Reporting compliance violations

The “Speak up!” whistleblower portal helps to uncover and prevent serious risks for MAN. “Speak up!” is used to accept and analyze information relating to serious infringements of the law, especially in the areas of white-collar crime (e.g., corruption offenses, suspected money laundering activities, and terrorism funding), antitrust law, and data protection. These reports are investigated in detail and violations are dealt with and sanctioned in line with the penalties permitted under labor law.

Memberships

MAN is a member of Transparency International and supports the United Nations Global Compact initiative. MAN is also involved in the Alliance for Integrity, an initiative of Germany’s Federal Ministry for Economic Cooperation and Development together with the German development agency Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), the Federation of German Industries (BDI), and numerous other German companies that is designed to promote integrity in the world of business. MAN is a member of the German Institute for Compliance (DICO), where it also participates in various working groups to actively shape compliance issues.

Compliance measures

	2019
Business Partner Approval Tool	760 business partners checked
Compliance training sessions	294 face-to-face sessions with 2,529 participants 16,865 employees participated in online training sessions
Compliance Helpdesk	215 questions answered by the central Compliance organization, another 1,113 questions answered locally
Together4Integrity	In 2019, MAN started with the roll out of Volkswagen’s Together4Integrity (T4I) program. This program is designed to promote the Group’s integrity, compliance, culture, and risk initiatives so that these are on a par with the Company’s key priorities. The aim is to work hand-in-hand with employees to create a culture of integrity within the Company. The program aims to implement numerous measures in various areas of the Company, such as Human Resources, in line with the five principles defined by the internationally recognized Ethics & Compliance Initiative (ECI). Integrity, as a guiding principle for appropriate behavior, is firmly established as one of MAN’s five corporate values. At Group and subgroup level, the MAN GRC function organized kick-off events for the T4I program, at which employees from all levels were able to discuss the issues of compliance and integrity with members of each Executive Board team.
Additional measures	A range of compliance- and integrity-related communication activities were initiated last year. In particular, the frank clarification of situations in which workplace dilemmas could arise was fostered with the aid of the Dilemma Game. Other activities included the dispatch of the GRC Newsletter on current GRC and compliance issues as well as events in the Group companies to mark International Anti-Corruption Day on December 9, 2019.