

CARMUNICATION – The In-Vehicle Data Lighthouse e.V. (Carmunication) is committed to fair competition. Carmunication pursues the goal of fair access to in-vehicle data for the entire automotive industry, because only free access means equal opportunities.

Carmunication is a reliable and responsible partner for its members and has therefore developed this Code of Conduct. The Code of Conduct shall be the common basis for a morally, ethically and legally correct behaviour of Carmunication, its decision makers and its members, with each being responsible individually.

## **1. RESPONSIBLE LOBBYING**

Carmunication and its consultants are committed to observing the following principles in lobbying activities:

- a) They pay attention to transparency and disclosure; this means they shall present information about their lobbying activities, the client / association they represent and their specific interest to officials and functionaries at first contact.
- b) They shall keep themselves informed on relevant, publicly available restrictions on activities and rules on incompatibility concerning the officials / functionaries, and act accordingly.
- c) All information must be obtained in a fair manner. It is forbidden to gather information in an improper manner, or to even attempt doing so.
- d) They shall pass on the information available truthfully for the purpose of conducting their duties.
- e) They treat all counterparts with respect and undertake to respect their professional and personal reputation.
- f) Carmunication shall refrain from any unfair or undue pressure on officials and functionaries; however, this does not preclude socially accepted and legitimate actions to give appropriate emphasis to an intervention.
- g) Carmunication does not accept the granting or the acceptance of benefits, gifts and invitations if this is intended to influence specific or future interests in an improper manner or even if such an impression could be created. The only exceptions are hospitality to the extent customary in business.

## **2. FAIR COMPETITION**

Carmunication is committed to fair competition. Therefore, any restriction and violation of competition or antitrust rules is unacceptable and incompatible with Carmunication's self-image and principles.

Carmunication and its members commit to refrain from any discussions, agreements and/or coordinated behaviours between competitors that violate applicable competition rules. Compliance with this obligation is a condition of membership in Carmunication and any violation thereof will be sanctioned by termination of membership.

### **3. BEHAVIOUR RULES**

Carmunication and its members agree not to discuss or exchange information that is not in compliance with competition or antitrust laws.

Carmunication and its members do not address any of the issues listed below:

- a) Prices and Terms: Price agreements, price changes, price differentials, discounts, recommendations to increase or decrease prices, rebates, credit terms, tariff guidelines, or other commercially sensitive business terms;
- b) Distribution Information: Plans of individual companies relating to the distribution or marketing of specific products, including proposed territories or customers, sharing of customers, sharing of geographic markets, disclosure of information relating to actual or potential individual suppliers or customers, joint purchasing, joint selling, joint after-sales service, etc;
- c) Company-Related Statistics: Carmunication does not allow attribution of specific information to a specific member company when conducting market research. Therefore, sensitive information is published in aggregated form, information is always collected from several different member companies and competitors, and information is anonymized so that individual companies or customers cannot be identified.

### **4. ORGANISATION OF CARMUNICATION MEETINGS**

Carmunication will ensure, to the best of its ability, that such "sensitive" topics are not discussed at association meetings and that

- a) the agenda and purpose of the meeting is available for review by all participants well in advance;
- b) the minutes accurately reflect the business and all discussions of the meeting;
- c) discussions and conversations are limited to agenda items;
- d) suspicious topics or behaviour that may violate competition law or antitrust regulations are terminated immediately (even in case of doubt and until an appropriate legal review has been conducted). ■