

INTEGRITY



OUR UNDERSTANDING OF INTEGRITY

For us, integrity means doing the right thing in a professional context on the basis of our own convictions. This includes steadfastness in adhering to these principles regardless of economic or social pressures. Integrity is an attitude. It provides an inner compass for correct action. This becomes crucial particularly in gray areas where there are no explicit (compliance) rules, these are contradictory or conflicting goals exist.

In addition to personal integrity, organizational integrity matters to us too. It is based on anchoring integrity in the Group's processes and decisions and offers people a fixed framework for interaction. In a third dimension, we understand integrity as an intangible corporate asset: It strengthens our stakeholders' trust and makes us more attractive for investors, customers and employees.

HOLISTIC MANAGEMENT APPROACH TO INTEGRITY AND COMPLIANCE

As the highest Group body, the Integrity and Compliance Group Board of Management Committee (K-VAC) deals with the design and guiding principles of the integrity and compliance management system. It is overseen by the Group Board of Management Integrity and Legal Affairs function. The committee includes the members of the Group Board of Management responsible for human resources and finance and other members of the boards of management and top management of the brands. K-VAC analyzes the design of the respective compliance management systems for each risk area and harmonizes the intervening processes. It reviews reports from the brands and regions on integrity, compliance and the Together4Integrity (T4I) initiatives and strategically develops the program.


In particular, the structures and processes changed in the context of the Monitorship have proven to be an important foundation for our Group. At the same time, they are a task for the future. In 2020, the boards of management of Volkswagen AG, AUDI AG, Volkswagen Group of America, Inc. and Volkswagen Group of America Chattanooga Operations LLC in particular committed to continuing on the course adopted and to further promote integrity and compliance (I&C) in the Group on a permanent basis. The independent audit by the U.S. Environmental Protection Agency shows that Volkswagen AG is making progress in this respect. The audit was successfully completed in the reporting year.

I&C should form the core of our business activities, including in our transformation from a vehicle manufacturer to a provider of sustainable mobility. We set binding standards for this in all areas. For example, every proposed resolution submitted to the Group Board of Management must demonstrate that it is in line with integrity and compliance requirements and state which relevant risks the targeted resolution includes and how the risks can be reduced. This I&C statement is also binding for decisions of the boards of management of the individual Group brands and companies and for bodies to which the board of management in question has dele-

gated decision-making powers. The I&C statement is thus anchored in the proposed resolutions of the Group's and the brands' top bodies.

ACTING WITH INTEGRITY AS THE FOUNDATION OF SUCCESS

Acting with integrity and in compliance with the rules is of key importance for the success and resilience of our Group. This is why we have made I&C a key element of our NEW AUTO Group strategy and chosen it as one of six focus topics of our sustainability program. Information on potentially negative effects of the Volkswagen Group in this area can be found in the "Compliance" section.

 > Compliance

We are aware that violations of laws, rules and regulations have consequences. We would not only lose our shareholders', customers' and employees' trust, we would also have to expect legal consequences and face the threat of fines.

This is another reason why we want to act as a role model in this area and thus retain the trust of existing and future employees, customers, shareholders and partners. We have set out the ethical basis of our actions in our Code of Conduct (CoC) and in the Group Essentials.

The aim is to gear our rules, processes and corporate culture to enabling every employee to act with integrity and in compliance with the rules at all times. At the same time, we want to ensure that, as a metric, I&C permanently has the same strategic and operational priority as, for example, sales revenue, profit, product quality or employer attractiveness.

TOGETHER4INTEGRITY: UMBRELLA FOR INTEGRITY AND COMPLIANCE

We bundle almost all our integrity and compliance measures in the Group-wide Together4Integrity (T4I) program. It is designed to protect the Group from risks in the long term.

TOGETHER4INTEGRITY
T4I bundles almost all the Volkswagen Group's integrity and compliance activities under a single umbrella in eleven key initiatives.

T4I works with uniform, robust process and implementation standards: The program gathers together relevant content and processes from 16 departments – including Integrity, Compliance, Risk Management, Production, Technical Development, Procurement and Sales – reviews, consolidates and coordinates the content, puts together packages of measures from it (concept), distributes them in the Group (rollout), checks successful implementation (quality control) and measures the effectiveness (success measurement).

The T4I rollout now encompasses 784 controlled companies in around 80 countries and has largely been completed. Implementation will be completed by 2025 at the latest. The Integrity and Legal Affairs function of the Board of Management has responsibility for it. The measures are each implemented locally in the companies.

Sustainable Success through Long-Term Monitoring

Success measurement and quality control play a key role in the T4I program. The Effectiveness Assurance department performs risk-based audits of whether the T4I measures have been introduced in the companies and how they are working. The central planning and reporting system of the T4I program provides permanent transparency on the implementation status of the core initiatives. This serves both internal Board of Management reporting and effective project management.

Launch events and perception workshops supplement the tools at the level of the local companies. The perception workshops measure the effectiveness of the T4I measures and involve representatively selected employees and managers as players in the change process.

Since the start of the program in 2018, 739 events have been initiated at more than 680 companies, of which around 244 were recurring perception workshops. More than 42,000 managers and employees have already taken part. Repeating the events makes it possible to measure the progress of the various companies.

244
perception workshops
have been taking place since 2018.

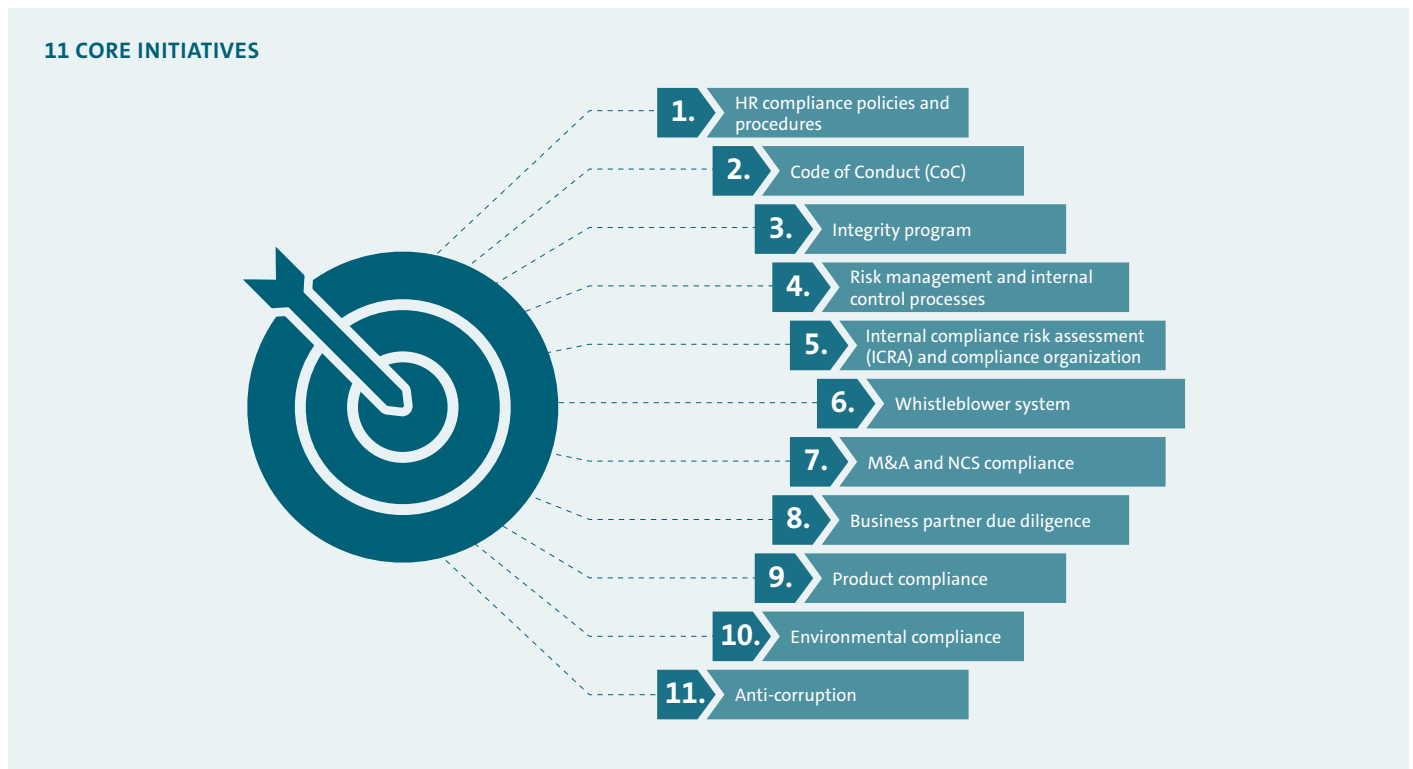
We have made further progress on this: More than 87% of participants in perception workshops surveyed stated that the anchoring of I&C in the companies is progressing successfully. This means a further increase compared with the previous year (around 83%) and a significant increase compared with the first measurement point in 2019 (around 71%).

Cultural Change and Other Changes

T4I not only establishes a worldwide integrity and compliance management system for all Group and brand companies but also advances one of the most extensive change and cultural programs in the history of the Volkswagen Group.

We want to increase awareness of each individual's valuable contribution. T4I is intended to motivate employees to act with integrity in all situations. Communication plays a key role here. For example our senior executives regularly spell out the central importance of I&C for the Group and the workforce in their "Tones from the top."

T4I thus means more for us than the sum of the parts.



T4I Initiatives and Packages of measures

The T4I packages of measures are grouped in 11 core initiatives:

- 1) HR compliance policies and procedures: I&C is integrated into standard HR processes such as recruitment, training, promotion and remuneration. It is also a compulsory topic in annual employee appraisals and is part of training measures for employees. Volkswagen AG and other defined companies keep anonymized statistics on misconduct and the resulting sanctions. These are regularly communicated to employees.
- 2) Code of Conduct: The Code of Conduct (CoC) lays the foundations for compliance in the Volkswagen Group. It acts as the key element for reinforcing awareness of responsible conduct and decision-making within the workforce, providing help, and finding the right contact persons in cases of doubt. The CoC is a component of the Group's employment contracts and is mandatory for all the Group's employees. The CoC is also part of employee appraisals as a measurement criterion for "setting an example of integrity and compliance."
- 3) Integrity program: The integrity program aims to anchor integrity as a strategic success lever and a control variable for decision-making processes. The objective is to communicate the importance of integrity to employees, to support them in acting with integrity in their day-to-day work and to make integrity visible and tangible. The most important tools included dialog-oriented communication measures, event formats and so-called integrity ambassadors, who carry the topic into the structures of the Group and promote dialog.

One focus of the program is raising awareness of making decisions with integrity. Specific training modules for all levels of management, including foremen, have been developed for this. These are integrated into all Volkswagen AG's obligatory management training programs. Brands and companies that do not use these programs are required to include corresponding modules in their own development programs.
- 4) Risk management and internal control processes: Binding structures and processes are intended to create transparency and help manage risk from our business activities. These include the quarterly risk process, which is focused on acute risks, the standard internal control system (ICS), which is intended to protect key processes, business continuity management, which identifies business-critical processes and protects them with contingency plans, and root cause analysis.
- 5) Internal compliance risk assessment (ICRA) and compliance organization: The ICRA determines the compliance risks in the Group. Based on their risk profile, measures are defined for each company and their implementation is tracked. The ICRA also defines implementation standards for the CoC, the whistleblower system, compliance training and communication. The Group Chief Compliance Officer reports to the K-VAC on an ad hoc basis, but at

least annually, on the implementation status of the measures. In the reporting period, the ICRA process was brought into line with the requirements of the German Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz*). These changes will be applied in 2023.

- 6) Whistleblower system: The whistleblower system is the central point of contact for reporting cases of rule-breaking by Group employees, direct and indirect suppliers, and selected other business partners. These include, for example, economic crimes, corruption, tax offenses and breaches of the CoC. A detailed description of the whistleblower system follows on p. 101.
- 7) M&A and NCS compliance: In the case of planned mergers and acquisitions (M&A) requiring the involvement of the Compliance team, the companies and transactions are audited for human rights risks and for integrity and reputation risks, including corruption, money laundering and fraud – for example, in a due diligence. This also applies to joint ventures, industrialization projects such as the construction of new foreign production sites with external partners, and collaborations with third parties. The business units are then given recommendations for risk-reducing measures. Furthermore, Group Compliance deals with compliance management at noncontrolled shareholdings (NCSs), i.e., companies that are not controlled by a Volkswagen Group company as a majority shareholder. This also includes the Chinese joint ventures.
- 8) Business partner due diligence: The business partner due diligence process reviews the integrity of business partners and suppliers on the procurement side and the sales side, particularly for corruption risks. This also encompasses constantly monitoring the business partners for whether they are complying with laws and ethical standards.
- 9) Product compliance: The product compliance management system (PCMS) supports our products in meeting the statutory and regulatory requirements of the exporting and importing countries, internal and external standards, contractually agreed customer requirements and externally communicated commitments over their entire service life. The PCMS defines roles and responsibilities for design, implementation and monitoring. We train employees and managers on product compliance and have central points of contact to which our employees can address their questions.
- 10) Environmental compliance: The Group's environmental policy and the environmental compliance management system stipulate that environmentally relevant aspects and requirements must be taken into account in all strategy, planning and decision-making processes of the brands and Group companies. This includes a KPI system that measures progress on environmental targets.

 > Environmental Compliance Management

11) Anti-corruption: The Volkswagen Group has a zero-tolerance policy toward active or passive corruption. This is anchored in both the Code of Conduct for Employees and in the Code of Conduct for Business Partners. Further Group policies set out how to deal with conflicts of interest, donations and sponsorship or benefits in the form of gifts or invitations. In addition, there are operating guidelines addressing approval procedures, record-keeping and appropriate behavior. Reported breaches of the code are pursued and investigated by managers and HR, and in serious cases also by our investigation offices. If personal misconduct is found, the HR department in question takes the appropriate disciplinary action.

Further Increasing the Measurability of Integrity

In addition to the perception workshops, the annual employee survey – the Opinion Survey – in particular provides information about the progress of our culture of integrity. The Group-wide survey includes a question on whether it is possible for each individual to act with integrity. If employees have any doubts about this, the relevant manager needs to identify and clear possible obstacles together with their team.

The brands that manufacture passenger cars use the “compliance, culture of dealing openly with mistakes and acting with integrity” strategic indicator as an additional metric. This is also based on the Opinion Survey and asks about compliance with regulations and processes, dealing with risks and errors, and whether it is possible to act with integrity. The key performance indicator has continuously improved through to 2022 from an already good starting point: since compilation of this indicator began, employee agreement has always been in the highest category of the underlying five-point scale.

COMPLIANCE: CLEAR RULES IN THE VOLKSWAGEN GROUP

Sustainable economic success can only be achieved if each individual complies with laws, internal regulations and voluntary commitments. Compliant behavior should be a matter of course for all Group employees. The compliance organization provides support through programs, guidelines for action, processes and practical advice in the Group-wide, risk-oriented compliance management system (CMS).

COMPLIANCE ORGANIZATION: ESTABLISHED ACROSS THE GROUP

Group Compliance supports the Group and brand companies in carrying out their business activities in compliance with the rules and complying with the relevant laws and internal regulations. Focuses of the work include anti-corruption and preventing embezzlement, fraud and money laundering. In addition, the Compliance department and Group Legal must be included in M&A transactions, which includes joint ventures, industrialization projects and cooperation projects with external partners. Group Legal also conducts risk assessments on antitrust and anti-competitive risks in relevant Group departments and companies.

The Group Chief Compliance Officer heads the global compliance organization. They report directly to the member of the Board of Management for Integrity and Legal Affairs and to the Audit Committee of the Supervisory Board of Volkswagen AG. The compliance organization is structured by division, which is intended to strengthen communication and enable harmonized processes across all relevant Group companies.

The divisional compliance officers are generally responsible for several brands and implement compliance measures in their area of responsibility. Porsche AG and Traton SE are exceptions from this. They have their own, independent compliance structure. One regional compliance officer is responsible for the activities of the Volkswagen-controlled entities in China. The controlled companies in Australia, Korea, Japan, Malaysia and Taiwan are overseen by a single regional compliance officer for the Asia region. In the reporting year, Group Compliance also created the new Group Technology divisional compliance office (DCO). It oversees the Board of Management's Group Technology business area and the Volkswagen Group Components brand together with affiliated companies. The DCO deals with compliance matters relating to the traditional component business and also with new fields of business such as the topics of batteries, charging and energy, or the sale of our individual components, modular toolkits and platforms to third parties.

Internal and external auditors regularly scrutinize the compliance management system. Particularly in the context of the monitoring and improvement process, auditors regularly audit the effectiveness of compliance measures. In addition, continuous improvement processes support the development of the CMS. Hot-topic reporting is an important aspect here. This process is used to quickly pass on information on compliance-relevant systemic incidents and for immediate escalation in the whole organization.

Risks at a Glance

From a compliance perspective, our business activities entail risks, including in relation to corruption, money laundering and violations of human and environmental rights. The ramp-up of our battery business means we need to purchase significantly more raw materials whose mining must be strictly monitored for human rights compliance. There is generally a high risk of corruption in the countries concerned. Breaches of environmental protection requirements may also harm the environment and lead to reputational damage and financial losses. We use our responsible supply chain system to proactively prevent or minimize social or environmental risks and corruption along the supply chain. The system builds on a systemic risk analysis. More information can be found in the Supply Chain and Human Rights chapter.

☰ > Supply Chain and Human Rights

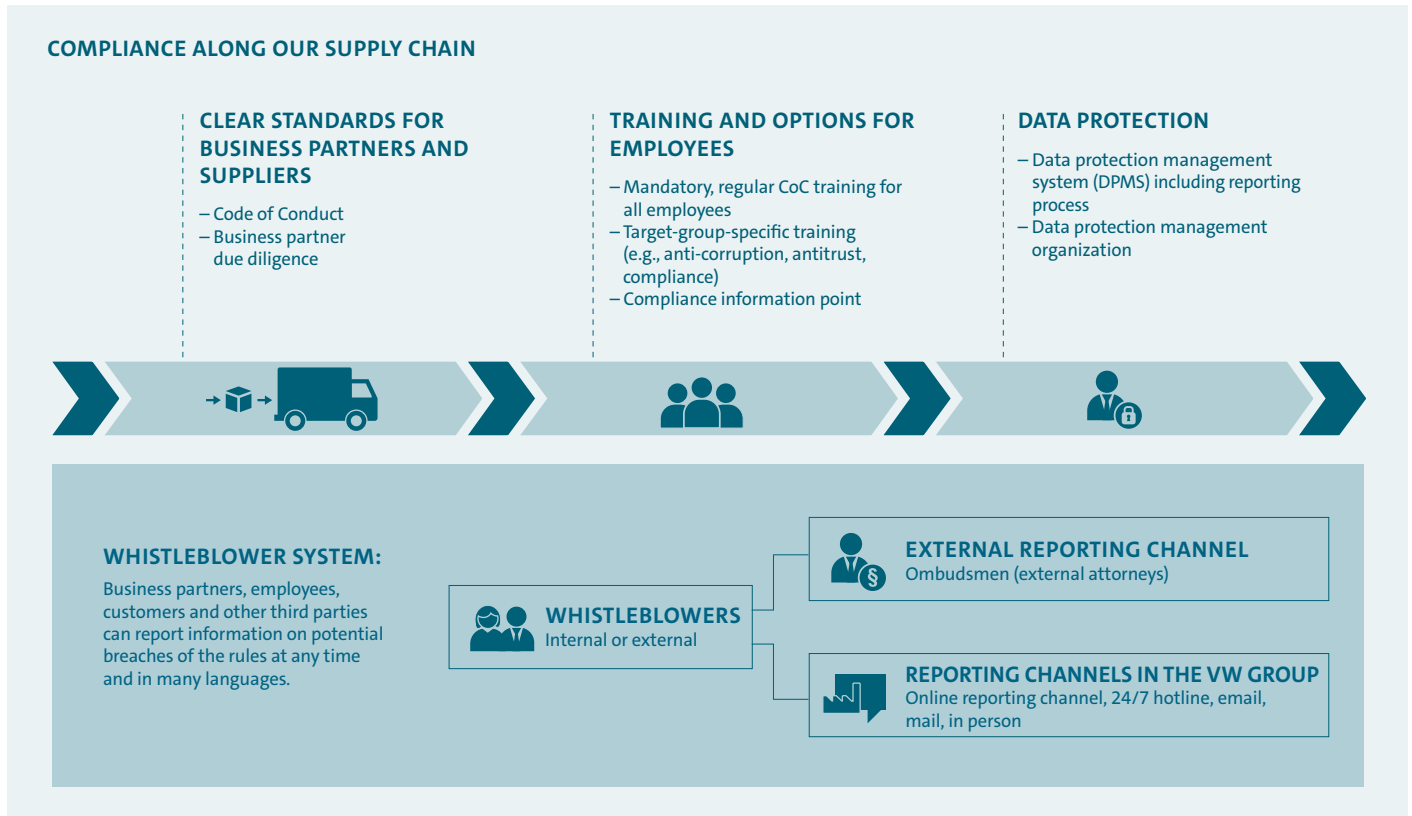
CLEAR STANDARDS AND COMPREHENSIVE OPTIONS

Clear Standards for Business Partners

Group Compliance supports the entities with operational responsibility in conducting business partner due diligence (BPDD). BPDD includes regular screenings, risk assessments, sanctions list checks and the identification of warning signs. We also check whether business partners (suppliers and sales partners) have a compliance management system or have implemented any compliance measures.

The aim is to identify risks for breaches of the law and disregard of ethical standards at an early stage, avoid high-risk business partners and define measures to minimize risk and implement these with business partners. In individual cases, selected business partners are contacted directly to resolve potential violations. If this is not possible, the business relationship will be terminated or not commenced in the first place. The business partner in question may be blacklisted from doing business with the Volkswagen Group and blocked from all its brands and companies.

The BPDD process is conducted together with the commissioning department – for example, Procurement or Sales. More than 4,300 BPDD reviews were carried out in 2022. As of December 31, 2022, we had identified around 400 cases that led to terminating or not commencing business relationships.



Extensive Compliance and Anti-Corruption Training

Group Compliance has implemented structures and measures to establish Group-wide, uniform standards for compliance training through the compliance management system – for example, on the Code of Conduct, on anti-corruption, the prohibition of money laundering and the whistleblower system. Implementation packages for the rollout of mandatory training describe the key aspects of the training in terms of content and process. These will enable brands and companies to train employees in a risk-based, target-group-specific manner with defined core content and hold training courses of equal quality. Members of senior management and above are certified on the CoC each year. They confirm that they comply with the requirements of knowing their own role of setting an example of compliance, raising the awareness of employees in their area of responsibility accordingly and giving them access to the CoC. Knowledge of the obligation to report serious breaches of regulations and the disclosure of any conflicts of interest are also part of the certification. Business partners and contractors from sales and procurement also receive training based on risk. The basis for this is the CoC for Business Partners. This has been a component of agreements with suppliers and service providers since 2020.

Across the Group, all employees are required to complete regular CoC training in accordance with uniform standards. It ensures basic awareness of integrity and compliance. The content of the training – including business and human rights, environmental compliance, product conformity, product safety, and occupational safety – is updated every two years. The next update will follow in 2023. The brands and companies regularly provide changing supplementary focus content from the Code of Conduct.

Here, employees have to complete the training and final test in the form of a web-based training (WBT) and repeat it every two years. Passing is documented in their training history. Interns, student workers and doctoral candidates are excluded from the training for technical and process reasons. Production employees receive mandatory CoC training every four years.

Volkswagen AG systemically records the number of permanent staff (employees and management, including full-time and part-time staff) who are required to take mandatory training and have a valid qualification from the web-based training on the CoC. In Volkswagen AG, 48,311 employees in the relevant target group had a valid CoC qualification as of the end of December 2022. This is equivalent to 98.4% of the permanent staff at Volkswagen AG who must be trained using the web-based training on the CoC.

In addition, Group Compliance develops and implements target-group-specific training for employees in areas or companies with high risk exposure. Anti-corruption training with an in-depth module on dealing with officeholders and mandate holders is mandatory for employees. Companies with high risk exposure must implement this training on a mandatory basis. Managers from senior management upwards also have their awareness raised regarding the parts of the CoC containing the prohibition on corruption as part of the annual certification on the CoC.

The number of permanent staff who are required to take mandatory training and have a valid qualification is systematically recorded for the mandatory web-based training on the topic of anti-corruption – for example, in Volkswagen AG. In Volkswagen AG, 45,808 employees in the relevant target group had the relevant valid qualification as of December 31, 2022. This equates to 93.0% of the permanent workforce (employees and management) to be trained, including full-time and part-time employees. The practical “Anti-corruption” guidelines can also be accessed at any time.

Group Legal introduced new web-based antitrust training in 2022. Depending on risk exposure, its completion may be mandatory. Group Legal also continuously provides antitrust training on a risk-based basis. The Group Board of Management is also trained on its content. In addition, employees who are employed in key positions with high risk exposure receive additional compliance training. This concerns, for example, managing directors or financial officers. This training is held across the Group by the respective companies' compliance and personnel managers.

In addition to the training, Volkswagen AG's compliance departments offer target-group-specific training formats and communication formats, including management discussions and training courses for disseminators of information. Moreover, compliance content is a component of all career development paths, from the trainee induction program through programs for leadership and management development to the senior management program. The measures are supplemented by information and communication activities such as awareness campaigns, film and dialog formats, newsletters and interactive games.

Communication and Advice: Options for Employees

The compliance information point has established itself as a central advisory office. It can be contacted in person, in the Volkswagen 360° app or by email. The team is responsible for specific compliance questions – for example, on sponsorships, memberships and collaborations and on questions relating to HR and labor law – interprets internal company guidelines and policies, and advises on process standards. If no direct recommendation is possible, the query will be passed on to a competent body. Dialog events in the departments supplement the services offered. Tasks and example cases from the practice of the advisory work are regularly included in compliance communication. The aim is to provide employees with concrete recommendations for future, similar questions and improve the internal control system.

In the reporting year, the information point handled 1,517 inquiries (previous year: 1,335, in each case Volkswagen AG). Around 18% relate to the acceptance or giving of gifts and invitations. Where gifts have been received that, for example, exceed value limits, and these cannot be given back – for instance, for cultural reasons – it is possible to hand these in to Compliance. The gifts collected in the past few years were sold at auction in the reporting year. The proceeds of around €10,200 Euro were donated to a non-profit climate and environmental protection association.

Data protection

To meet the requirements of the EU-wide General Data Protection Regulation (GDPR), Volkswagen AG has created a data protection management system (DPMS) and a data protection management organization. The DPMS ensures that the data protection processes set up are regularly analyzed, are up to date and are further developed. One component of the DPMS is the process for reporting data protection violations (reporting process). It is connected with Volkswagen AG's whistleblower system and IT Security. In fiscal year 2022, there were no reportable data protection breaches pursuant to Art. 33 EU GDPR in the processing of personal customer data. In addition, reportable data protection breaches outside of the processing of personal customer data were also reported to the competent supervisory authority in due time. In accordance with Group policy, Group companies are responsible for their own compliance with the applicable data protection requirements.

Risk Prevention through the Whistleblower System

The whistleblower system is intended to avert damage to the Group, the workforce and other stakeholders with binding principles and regulated procedures. Employees, business partners and their employees, customers and other third parties can report information on potential breaches of the rules at any time – including anonymously if they so choose. The whistleblower system offers six different reporting channels for this. These include an online channel, which accepts reports in many languages; an international 24-hour telephone hot-

line; and external attorneys, who act as ombudsmen. The processing of the reports and any follow-up questions can also be confidential and anonymous, if this is requested. Special IT infrastructure prevents the source of the information from being identified.

Strict confidentiality and secrecy apply throughout the investigation process. An investigation is only initiated after a thorough review and in the event of concrete indications of rule-breaking. There is a presumption of innocence. Those involved are heard as soon as possible, and their names are cleared if they have been wrongly accused. Sanctions are applied where misconduct is proven. This can comprise a warning, a reprimand or termination. Following serious breaches of rules, structured root cause analyses are conducted in order to prevent similar incidents in the future.

The Central Investigation Office in Wolfsburg coordinates the Group-wide whistleblower system. The employees there process whistleblower information concerning Volkswagen AG and those of its subsidiaries that do not have their own investigation office and also process reports with relevance for the Volkswagen Group.

Group Internal Audit, Group Security and Group Legal assist with operational case investigation. In individual cases, the investigation office also commissions investigations by independent and external third parties, such as law firms or auditors. This may occur especially when the information concerns members of the Board of Management or cases are exceptionally complex – particularly with imminent legal consequences for Volkswagen AG (e.g., in the event of particularly serious corruption or possible breaches of antitrust and anti-competitive law).

AUDI AG, Porsche AG and TRATON SE each have separate investigation offices for themselves and their subsidiaries. There is also a regional investigation office at Volkswagen (China) Investment Company Ltd. It processes whistleblower information concerning Volkswagen AG's Chinese subsidiaries. Cooperation between the investigation offices and uniform processing of whistleblower information are centrally monitored and coordinated in Wolfsburg.

An IT system, internal controls and multiple-party verification support employees with the processing of suspicious activity reports. Figures on the whistleblower system are reported to the Board of Management and the Supervisory Board at regular intervals. The workforce is also regularly informed about the whistleblower system. In addition, numerous compliance training courses address the task of the whistleblower system and how it works. Employees who might frequently come into contact with serious breaches of rules due to their work receive in-depth training. This includes, for example, employees in the fields of audit, security, human resources, legal or compliance.

The Volkswagen Group assures all whistleblowers and people who support the whistleblowers or the investigations of protection from any reprisals they could experience due to their reports and their efforts to investigate breaches. This is anchored in Group policy 3, which applies worldwide, and is described in the Code of Conduct. The terms stated in the Group policy show that the Volkswagen Group complies with the provisions of international whistleblower protection laws – for example, the EU directive on whistleblower protection, its implementation acts and the German Supply Chain Due Diligence Act (LkSG). To prepare for the entry into force of these new legal regulations, the Central Investigation Office has carried out an information campaign to raise awareness in the relevant Group companies. Breaches of the ban on discrimination are treated as serious breaches of the rules.

Within the digital ComplianceXChange workshop format, the whistleblower system team communicates with experts from other DAX companies twice a year to share experiences and discuss current issues.

Suspected Cases and Compliance Breaches in the Reporting Year

In 2022, the investigation offices registered 3,073 whistleblower reports (2021: 3,219). Around 24% of these were anonymous but with the option to contact the whistleblower, and around 9% were anonymous without the option to make contact. In 754 cases, the Central Investigation Office accepted an initial suspicion of breaches of the Code of Conduct, in several cases also of laws and/or specific internal regulations at the same time, with the result that an internal investigation was initiated. Of these, 187 cases involved potentially serious breaches of rules.

In the reporting year, the investigation offices investigated individual cases of suspected serious infringements of rules to prevent corruption. In six cases this resulted in significant sanctions such as warnings or dismissals. In five cases this was due to violations of rules to avoid conflicts of interest and in one case to a violation of procurement guidelines. Five investigations into suspicions of serious infringements of antitrust or competition law were closed. In none of these cases was a serious violation of antitrust or competition law established.

An independent external auditor regularly audits the effectiveness and functionality of the whistleblower system. The audit is currently conducted annually. The Audit Committee of the Supervisory Board, the Group Board of Management and the boards of management of companies concerned are informed of the result and possible suggestions for improvement. The past audit showed that the Group whistleblower system's processes are suitable for efficiently and effectively processing whistleblower information. In the reporting year, the investigation offices of AUDI AG, Traton SE, Porsche AG and Volkswagen AG were audited.

INTEGRITY KPIS

KPI	Unit	2022	2021	Notes and comments
T4I				
T4I rollout in controlled companies	number	784	707	Since the start of the program
Approval rate from T4I perception workshops	in %	87.8	82.7	Definition, see p. 96
Information point				
Inquiries processed to the compliance information point	number	1,517	1,335	Volkswagen AG
Change in inquiries processed to the compliance information point	in %	14	-10	
Code of Conduct				
Employees of Volkswagen AG who have a valid qualification on the Code of Conduct	number	48,311	48,017	Web-based training; scope definition, see p. 100
Proportion of the workforce of Volkswagen AG to be qualified	in %	98.4	98.2	Web-based training; scope definition, see p. 100
Anti-corruption				
Employees of Volkswagen AG who have a valid qualification on the topic of anti-corruption	number	45,808	36,565	Web-based training; scope definition, see p. 100
Proportion of the workforce of Volkswagen AG to be qualified on the topic of anti-corruption	in %	93.0	74.8	Web-based training; scope definition, see p. 100
Pieces of whistleblower information				
Pieces of whistleblower information	number	3,073	3,219	In all investigation offices
of which anonymous and without any possibility of contact	in %	9	10	
BPDD reviews	number	> 4,300	> 8,600	Business partners in sales and procurement (suppliers)
Culture of rules				
Compliance, a culture of dealing openly with mistakes and acting with integrity		86.6	86.3	