

## THEFT-RELEVANT PARTS ORDERING POLICY

	<b>Applies To: MBUSA, DEALERS</b>	
<b>Policy. #: PAC003</b>	<b>Issue Date: Nov. 3, 2008</b>	<b>Issued By: GENERAL MANAGER, PARTS LOGISTICS</b>
	<b>Effective Date: Feb. 5, 2009</b>	<b>Approved By: Original Signature on File</b>

### 1. PURPOSE / APPLICABILITY:

- 1.1 This document defines, establishes and maintains the mandatory Theft-Relevant Parts Ordering Policy for Mercedes-Benz USA.
- 1.2 This policy applies to all MBUSA and Dealer personnel who have the ability to place orders for Theft-Relevant Parts.
- 1.3 This policy replaces the previous Key & Lock Ordering policy described in Info Bulletin IB-600102 issued March 15, 2002.

### 2. OWNERSHIP AND APPROVAL:

- 2.1 The General Manager, Parts Logistics owns and approves this document. All revisions must be approved by the document owner prior to inclusion.

### 3. DEFINITIONS / TERMS:

- 3.1 MBUSA - Mercedes-Benz USA
- 3.2 USA – United States and its Territories
- 3.3 Dealer – Authorized Mercedes-Benz Dealership in the USA
- 3.4 VIN – The 17-character Vehicle Identification Number
- 3.5 Paragon – MBUSA Parts Inventory Control and Ordering System
- 3.6 EPCnet – Mercedes-Benz Electronic Parts Catalog
- 3.7 Theft-Relevant Part (TRP) – Any part marked as a Theft-Relevant Part (“TRP”) in Paragon (Dealer Dashboard screen YPIM, “Vin Req?” indicator) or in EPCnet, including but not limited to:
  - Keys of all types, including mechanical and electronic, with and without transponder, including workshop (green/orange) key
  - Locks and lock cylinders and lock sets of all types, including mechanical and electronic
  - Electronic remote locking/unlocking control units, including Infra-Red, Radio Frequency, transponder, Keyless-Go and other communications types.
  - Electronic selector/shift lever modules (Models 215, 220, and 230 only)
  - Transmission gear control units (722.9 transmission only)
  - Electronic Steering Lock
  - Engine control module
  - Flashware and repair CDs
  - Certain airbag/SRS cables, etc.
  - Body shell, certain body panels and components

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- All vehicle identification plates  
Parts not indicated as TRPs in Paragon screen YPIM and not requiring a VIN to order are not TRPs for the purposes of this policy.
- 3.8 DRT – German acronym for “Diebstahl-Relevant Teil” which is translated as Theft-Relevant Part
- 3.9 DAS – Diagnosis Assistance System of Star Diagnosis.
- 3.10 SDflash – An online system permitting the coding and preparation of certain electronic control modules.
- 3.11 COSN – Customer Outside the Sales Network, any non-dealer (including customers and independent repair facilities).
- 3.12 Vehicle Ownership Document – Vehicle title, registration, or other document that proves ownership. A document that would be accepted by your state Dept. of Motor Vehicles to issue a title is considered proof of ownership.

### 4. POLICY REQUIREMENTS:

#### 4.1 Documentation and Recordkeeping requirements

A Theft-Relevant Part can be considered as any part which may aid in the theft of a vehicle. It is the dealer’s responsibility to verify the required documentation before accepting any order for, or delivering, a TRP. This precaution is necessary to safeguard our customers’ valuable properties and minimize your liability exposure. Failure to adhere to these requirements can expose you, your employees and your dealership to criminal or civil liability in cases of theft or fraud. For these reasons, it is absolutely essential that all personnel adhere to the following policies.

**4.1.1.** Theft-Relevant Parts (TRPs) may only be ordered by the vehicle owner or his/her authorized representative. Dealers are a special case when ordering a TRP to complete a vehicle repair (See 4.1.4).

TRP orders for any vehicle not physically located within the USA cannot be accepted. Instead customers should be referred to the Mercedes-Benz service organization in the country where the vehicle is located.

For vehicles which were not originally delivered via MBUSA, additional documentation requirements may apply when placing orders for TRPs (and any other spare parts) for these Non-USA vehicles.

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**4.1.2.** When an order for a TRP is placed by the vehicle owner, the following documents must be presented:

- The original of the vehicle registration or ownership document
- The original of the vehicle owner's driver/operator license\*

In the case of a leased vehicle: an original of the lease agreement showing the VIN, Bank or Leasing Company's name and the name of the person requesting the TRP should also be presented. In the case of a Mercedes-Benz Financial lease, a printout of the lease agreement from MBAAdvantage is sufficient.

**4.1.3.** When an order for a TRP is placed by an authorized representative of the vehicle owner, the following documents must be presented:

- The original of the vehicle registration or ownership document
- The original of the authorized representative's driver/operator license\*
- An original document authorizing the representative to act on behalf of the vehicle owner
- A legible photocopy of both sides of the vehicle owner's driver/operator license\*

An authorized representative may be a private citizen or family member acting on behalf of the owner, an independent workshop acting on behalf of their customer, an employee acting on behalf of their employer, a government official acting on behalf of their agency or department, or an association member acting on behalf of their association. In the last three cases, the authorization letter must come from someone authorized by the company, agency or association to act on it's behalf, and include a copy of their personal identification.

**\* Government issued driver/operator license with photo, or as an alternative a Passport, is the best document to establish positive identification. Always request this form of identification.**

**4.1.4.** When an order for a TRP is placed by a dealership employee for the purpose of repairing a vehicle presented for service, or completing the key set for unsold vehicles (new or used), the following documentation must be presented:

- A valid Repair Order authorized by the vehicle owner or (in the case of unsold vehicles, dealer General Manager or Sales Manager), with the TRP clearly noted.
- A legibly completed TRP form signed by the requesting employee and delivering employee.

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**In the case where the TRP is replaced at a dealer facility, no additional legitimacy check (e.g., ownership, identification) is required from the vehicle owner / driver.** Each TRP may only be installed to the vehicle for which it was ordered.

**4.1.5.** It must be verified that the person presenting the documents is in fact the person identified by the documents. There must be a clear match between the identification documents and ownership documentation and the person ordering / receiving the TRP (in some cases additional documentation may help provide this connection). Household members who are not the vehicle owner are 'Authorized Representatives' and are handled according with section 4.1.3.

**4.1.6.** The "TRP Form" (MBUSA-122531448495, sample attached) must be completed and signed. Dealers must maintain these paper records on file for a time period of not less than ten (10) years from the date of delivery of the TRP. All of the following documents must be attached to the TRP form:

- Photocopies of both sides of the identification documents presented
- Photocopies of both sides of the vehicle documents presented
- Photocopy of the repair order (if applicable)
- Original of the representative's authorization (if applicable)
- In the case of control units, a copy of the DAS quick test.

These files are subject to audit at any time, and must be available for presentation to MBUSA representatives or law enforcement authorities at any time for the entire retention period. Scanned documents are not acceptable.

Every delivery of a TRP must be recorded by the dealer, as well as acknowledged by the receiver and documented internally. In the case of delivery to a non-dealer of any body components / body panels on which a VIN must be attached, there must also be a notation or stamp on the TRP Form to the effect that 'the original VIN is not to be used or inscribed upon the part'. Certain states may require a physical inspection of the vehicle.

**4.1.7.** It is of equal importance to re-verify all of the necessary documentation, in addition to having the person verify by signature their receipt of the TRP, when handing the TRP over to the customer.

### **4.2 Delivery of TRPs that require coding or other preparation**

**4.2.1** When accepting an order for any of the following TRPs, the customer is to be informed that the vehicle must be presented to the dealer workshop for installation /

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synchronization / coding. This is to ensure complete security of the process.

- Electronic vehicle key, including transponder key
- Electronic ignition lock
- Electronic workshop key (green/orange)
- Electronic infrared control unit
- Electronic selector lever module (Model 215, 220, 230 only)
- Gear control unit from NAG2 (722.9 only)
- Electronic steering lock

When any of these TRPs are delivered, the dealer must install them in their own workshop and verify proper function. One exception is if the vehicle cannot be moved; in such cases, the dealer may dispatch an employee to the vehicle to install and code the TRP.

Note that a procedure by which Registered Locksmiths nationwide can purchase keys for customer lockout situations exists in accordance with California law. Keys delivered under this Secure Data Release Model are not delivered via a dealer, and dealers have no obligations for these keys under this policy.

**4.2.2** In the case of an Engine Control Unit (*Only in vehicles equipped with Drive Authorization System, US Model Year 1996 or later*): These may be delivered specifically for a certain vehicle as replacement parts to a COSN if the following TRP requirements are complied with. In the case of the ordering of engine control units by any customer outside the sales network, the following additional points are also required:

- The installer has an enabled SDflash user ID to put engine control units into operation. Record the SDflash User ID on the TRP form. (M/Y 2003 on)
- Submission of the record of the diagnostic quick test or the test of the engine control unit carried out using the Star Diagnosis tester or Pass-Thru device (M/Y 2003 on)

All documents mentioned above and in section 4.1 must be received by the dealer and attached to the TRP form.

**4.2.3** For complete lock sets only, the order must be on MBUSA Form 5020, accompanied by a letter on dealer letterhead. The letter must state the required part number, the complete chassis number of the vehicle for which the lock set is needed, and include a statement indicating that the dealership will ensure the new key code information will be provided to MBUSA (as explained below). The letter must be co-

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signed by the Service and Parts Managers.

The order and letter must be faxed to Dealer Parts Services at (877) 766-6262 for processing. **When the lock set arrives at the dealership, the dealer MUST call DPS at (877) 727-8762 with the new key code information so that the vehicle database can be updated. Failure to do so jeopardizes the ability to provide keys in the future.** Note that this entire procedure is subject to audit at any time.

### 4.3 Handling vehicle keys

A fundamental rule is that when any vehicle is received, all the keys that are handed in for customer vehicles, new vehicles, demonstration vehicles, used vehicles, hired vehicles and the company's own vehicles must be tested to ensure that they function in the respective vehicle, and the number of keys must be recorded. Non-functioning keys must be determined in the presence of the person handing them in and recorded in writing, with the signature of both the person handing in the key and the person accepting the key.

For modern Drive Authorization Systems, the key test on the vehicle comprises both the mechanical and electronic opening function and the activation of the immobilizer when starting the engine. For new, demonstration, used, hired and the company's owned vehicles, the specific keys received with the vehicle are to be noted in writing on the TRP form.

If a key is lost while a customer vehicle is in the care of an authorized Mercedes-Benz dealer, the key track(s) in question must be disabled immediately and rendered inoperative by procuring and programming a replacement key for the missing key. The complete mechanical lock set (see section 4.2.3) must be replaced to ensure vehicle security. The customer must be informed. In addition, a corresponding note must be made on the repair order.

In the case where the dealer learns that a key has been lost, the dealer is obligated to advise the customer that the only way to ensure vehicle security is to replace the mechanical lock set. The customer acknowledges receiving this advice on the TRP form. It is the customer's option as to whether they follow this advice or not.

These requirements must be followed rigorously, otherwise an insurance company can refuse claim settlement for the theft of a vehicle in the care of an authorized Mercedes-Benz dealer, and/or a report may be made to the authorities regarding suspected fraud.

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The party responsible may also become the subject of a compensation claim by the customer.

### 4.4 Storage of undelivered TRPs, Handling of faulty or unneeded TRPs

**4.4.1** Keys and other TRPs received by the dealer and awaiting installation or delivery must be stored in a secure location with accountable access.

**4.4.2** When a TRP is to be replaced, the old parts which have been removed are not to be handed over to the customer or the customer's representative. The customer or non-dealer workshop is to be informed of this prior to acceptance of the order (note or stamp on order form). If the customer insists on being given the old part (customer-pay only), receipt must be acknowledged by the customer in writing.

**4.4.3** For quality analysis, the Quality Evaluation Center (QEC) can request TRPs replaced under warranty for evaluation. TRPs requested to be returned to MBUSA must be sent using a trackable method.

**4.4.4** All Theft-Relevant Parts for which return is not planned are to be destroyed and rendered completely inoperable and/or unusable by the dealer, this destruction must be recorded on the TRP form. Again, if the customer insists on being given the old part (except in case of warranty), receipt must be acknowledged on the TRP Form by the customer in writing.

### 4.5 Important Notes

Keys ordered by a dealer cannot be drop-shipped to a third party location.

Keys ordered and delivered through the Registered Locksmith ordering process (Secure Data Release Model) are handled in accordance with the legal requirements of that process. Dealers carry no obligations for that process under this policy.

Keys are unique to the vehicle for which they are ordered, for this reason they are not returnable for credit, therefore you should make every effort to deliver the ordered key to the customer. Electronic keys cannot be reprogrammed for any other vehicle

If you encounter operational problems with a key or lock from the Ft. Worth Key & Lock Site, please complete a Quality Control Sheet and return it with the respective key or

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lock. The Key & Lock site will acknowledge the report and advise the corrective action to be taken.

### 4.6 Policy Audits

Dealers may be audited at any time to ensure compliance with this policy.

### 4.7 Acknowledgements

**4.7.1** The Dealer Principal or MBUSA Site Manager must acknowledge in writing the receipt, understanding, and communication of this policy to employees, by completing the TRP Policy Acknowledgement Form (MBUSA-122572137402). A copy is to be retained at the dealership, and the original returned to Dealer Parts Services as shown on the form. This must be received by MBUSA before the dealer will be permitted to order TRPs.

**4.7.2** It is the responsibility of the dealership or MBUSA site manager to ensure that a current Acknowledgement is on file at MBUSA, and that all personnel who may order or handle TRPs are fully informed of this policy. This requirement is subject to audit at any time.



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## 5. REFERENCES / APPENDICES:

### 5.1 TRP Order Form Sample (MBUSA-122531448495)

*This is a sample of the TRP Acknowledgement Form, MBUSA-122531448495. Always download the latest version of a form before using it.*

**TRP Form** This form is to be completed in full and filed for each order of a Theft-Relevant Part (TRP)

**Dealers must maintain this form and all supporting documentation on file for not less than 10 years.**

Name and address of the vehicle owner	TRP Repair Order No.
Name and address of the authorized party	Order date
Mercedes-Benz Dealer Stamp	Dealer code
	Vehicle identification Number (VIN)

**Order Accepted** \_\_\_\_\_  
Date Name of Dealer employee, printed Signature of dealer employee

**TRP Ordered +** \_\_\_\_\_  
Date Name of customer, printed Signature of customer

### Checklist for Documentation of Theft-Relevant Parts Adherence with Policy

**Reason for TRP order** \_\_\_\_\_  
Part name, number, quantity, and Paragon order number

#### Verification of owner and authorized party identity, and vehicle ownership (prior to accepting order)

Vehicle owner's drivers license or passport\*  \_\_\_\_\_  
 Authorized party's driver's license or passport\*  \_\_\_\_\_  
 Original notarized authorization letter from vehicle owner (for authorized party only)\*\*  \_\_\_\_\_  
 USA vehicle registration or title in owner's name\*  \_\_\_\_\_

Document number

Initials of dealer employee

#### TRP delivery to customer

Customer identity and vehicle ownership re-checked  \_\_\_\_\_  
 All required paperwork attached to this form  \_\_\_\_\_  
 TRP programmed to vehicle in Dealer workshop  \_\_\_\_\_  
 Old TRP is available and properly disposed by dealer  \_\_\_\_\_  
 Old TRP was returned to MBUSA QEC for review  \_\_\_\_\_  
 Ordered TRP was not picked up and therefore properly disposed by dealer  \_\_\_\_\_  
 Key tracks for any unaccounted keys were disabled  \_\_\_\_\_  
 Customer informed that programming is required for this TRP, must be carried out at the dealer  \_\_\_\_\_

Signature of customer

Old TRP retained at customer request  \_\_\_\_\_  
 Customer was informed in the case where a key was lost that a new mechanical lock set must be installed  \_\_\_\_\_

#### TRP handed out

Part name, number, and quantity \_\_\_\_\_

**TRP Delivered** \_\_\_\_\_  
Date Name of Dealer employee, printed Signature of dealer employee

**TRP Received** \_\_\_\_\_  
Date Name of customer, printed Signature of customer

\* Originals presented and both sides photocopied for attachment to this form. \*\* Original attached to this form.  
 + The person ordering has been informed that the vehicle must be brought in for the collection and programming of the electronic key.  
 TRP Form, MBUSA-122531448495, Rev 10/2008, initial issue

*Employees are responsible for adherence to and knowledge of MBUSA policies. Failure to comply with same may result in disciplinary action up to and including discharge*

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**5.2 TRP Policy Acknowledgement Form Sample**

*This is a sample of the TRP Acknowledgement Form, MBUSA-122572137402. Always download the latest version of a form before using it.*

**Dealer Principal or MBUSA Manager: Please complete this form, file a copy at the dealership or MBUSA facility, and return the original with signature to:**

**MBUSA Parts Assistance Center  
TRP Audit Team  
1 Mercedes Drive  
Montvale NJ 07645**

By signing this form, you acknowledge that you have read and understood the MBUSA Theft-Relevant Parts Ordering Policy, and have communicated the complete policy to all employees authorized to order or handle TRPs. It is your responsibility to ensure compliance with this policy.

<b>Your Full Name (Please Print):</b>	
Dealer Code or MBUSA Cost Center:	
Dealer or Facility Name:	<b>SAMPLE</b>
City, State:	
<b>Today's Date:</b>	
<b>Authorized Dealer Representative Signature:</b>	

Form MBUSA-122572137402      Version: Initial      Issue Date: November 3, 2008

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### 6. REVISION HISTORY:

<b>Revision #</b>	<b>Date</b>	<b>Purpose</b>
0	Nov. 3, 2008	Initial Issue
1	Nov. 21, 2008	Added definition 3.12; Language changes to Sections 4.1.1 (Modify dealer reference to comply with 4.1.4), 4.1.3 (add leased vehicle info), 4.1.5 (Remove reference to address match, add possibility for additional documents), 4.1.6 (Scanned docs unacceptable), 4.2.1 (add reference to SDRM process and Calif. Law, remove ref. to complete lock set), 4.2.2 (remove 'in advance'), 4.2.3 (remove ref. to dealer installation to agree with 4.2.1), 4.3 (Clarify customer vehicle and advising), 4.5 (Add reference to SDRM process); Section 4.1.4 re-written to indicate customer info not needed.
2	Dec. 10, 2008	Moved lease vehicle case form 4.1.3 to 4.1.2; Removed Notarization requirement from 4.1.3
3	Feb. 5, 2009	Specified that requirements in 4.2.2 applied from M/Y 2003 on; added reference to Pass-Thru device to 4.2.2