

2021

# Sustainability & CSR Report

Changing the game in mobility

getting you there

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There are many ways to contribute to society and the environment. At Athlon, going green is part of our strategy and we take action to become carbon neutral in our fleet and in our offices.

I strongly believe green and flexible fleets are the future, with electrification as a top priority. We set ourselves the ambitious target to grow our fleet's share of electric cars and vans to 50% by 2025.

We are on this journey together with our customers. In 2008, we brought the first electric cars into their fleets and expanded our knowledge since then. We bring in our expertise and passion to support them in achieving their ecological and economic ambitions. The key success factor? Listening to our customers, to their wants, needs and worries.

As we shape sustainable mobility, Athlon is part of a bigger picture: a shift towards a sustainable world. Our 5-Step Mobility Plan helps everyone taking sustainable mobility decisions. At Athlon, we walk the talk and offer environment-friendly mobility solutions to our customers and colleagues that fit their lifestyle.

Sincerely,

Chistian Soller

Christian Schüler CEO Athlon







# Our Company

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#### Athlon at a glance

We are one of the leading providers of multi-brand vehicle leasing and fleet management in Europe. For more than 100 years, Athlon has developed innovative, sustainable and cost-efficient business mobility solutions. Our vision is to shape sustainable mobility.

- → 1,550 employees
- → present in **20 countries**: 11 European countries (directly via Athlon entities) + additional countries (indirectly via partner networks)
- → total fleet of 500,000 cars and vans, including partners, of which 398,000 cars and vans = Athlon fleet

#### Athlon offices

Belgium France Germany Italy Luxembourg

Netherlands Poland

Portugal Spain

Sweden **United Kingdom** 

#### Athlon Partners

Austria

Czech Republic Denmark

Hungary

Norway

Republic of Ireland

Romania Slovakia

Turkey

#### **Getting you there**

The way we move from A to B is evolving. Nowadays you need to navigate your way through a world of changing regulations, switching from fossil fueled to electric vehicles - whether equipped with autonomous and connected technologies or not. Or do you opt for Mobility as a Service (MaaS)? No matter what you choose, Athlon is getting you there.

#### Local expertise on an international level

Headquartered in Schiphol, the Netherlands, Athlon is active in 20 countries. We are part of Mercedes-Benz Mobility AG.

#### Our mission and values

Whatever your destination, whatever your personal vision and whatever your business goals: Athlon gets you there.

We know mobility. Our team guides, supports and delivers the fleet and mobility solutions that are best for you – our customer – for society and for our company. We focus on growing by shaping sustainable mobility. By 2025, we aim to have a multi-brand fleet of more than 500,000 cars and vans, of which at least 50% will be electric.

The pandemic has proven that flexibility is key and our customers need an experienced partner to achieve their ecological and economic ambitions. We are working closely together to transform their car policies into mobility policies. Our Athlon Team brings in knowledge, experience and passion to support them in offering an attractive mix of solutions to their employees. On top of that, we are speeding up the digital transformation.

It is our strategy to create sustainable growth driven by our people and efficient digitized operations. To reach our goals, we focus on Growth, Digital, Green, People and Performance.

Within the area of **Sustainability** the focus on 4 impact areas helps us to accelerate our sustainability movement. We created a GO! Green 360° approach:

- 1 Limit our environmental footprint (first, start with ourselves and learn)
- 2 Enable sustainable mobility (then help our customers)
- 3 Contribute to society (how can we make the world a better place?)
- 4 Create a responsible supply chain (let's join forces with our suppliers)

Our strategy is based on profitable and sustainable growth, driven by our people and efficient digitized operations. To reach our goals, we focus on: Growth, Digital, Green, People and Performance. GO! Athlon

We know mobility. Our team guides, supports and delivers the fleet and mobility solutions that are the best for our customers, society and our company. We get you there. That's **our mission**.

We shape sustainable mobility. That's our vision.

#### We live by our Core Values:

- → Integrity, Openness and Respect
- → Inspired, Empowered and Diverse People
- → Customer Focus
- → Financial & Social Responsibility
- → Commitment to Excellence
- → Sustainability



#### Our products and services

Athlon makes the future of mobility accessible. We turn our customers' vision into reality with tailored solutions that satisfy both short-term and long-term requirements for fleets of any size. Our services pave the way for a sustainable future. We categorize them in three areas: leasing, mobility solutions and management & consulting.

#### Leasing

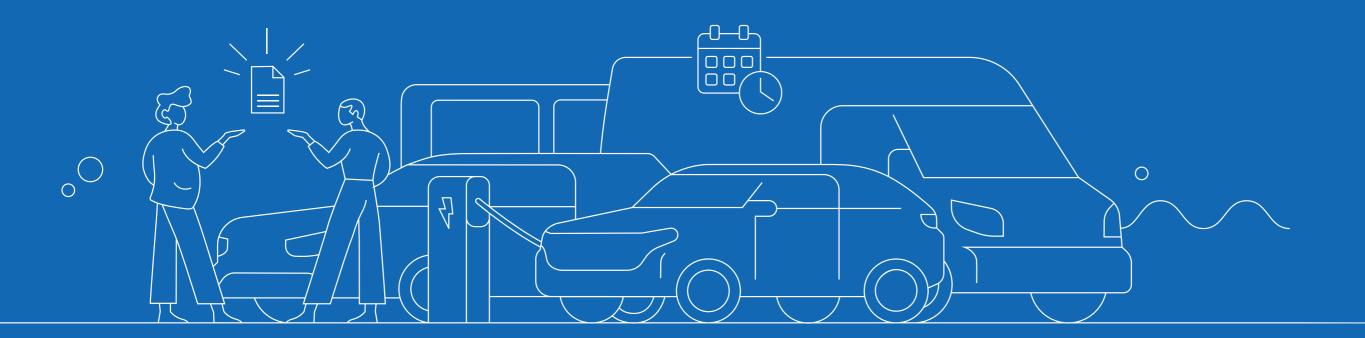
- → Athlon Lease I An all-in-one leasing service tailored to the fleet and mobility needs
- → **Athlon Flex I** A flexible mobility model that gives employees full control over their individual mobility, fit to their changing lifestyle and changing needs
- → **Athlon Rent I** Short- and midterm ready-to-use rental solutions for passenger cars and commercial vans
- → Athlon VanLease | A full service lease for vans
- → Athlon EmployeeLease I A full service car leasing solution for employees without a company car

#### **Mobility**

- → **Athlon MobilityBudget I** Employees are given a budget for their mobility, granting them access to different mobility options
- → **Athlon BikeLease I** Lease a company bike with full service package
- → **Athlon Share I** Easy-to-use corporate car-sharing solutions
- → Athlon Subscription I An agreement for a defined period of time with automatic renewal and cancellation period. It includes an option to exchange or return the car at the end of the subscription contract, allowing the customer to avoid the risks associated with ownership and to have a transparent all-in-one monthly payment

#### **Management & Consulting**

- → **Athlon MobilityConsulting I** Athlon's mobility consultants help to get the best for their customers, businesses and drivers
- → **Athlon eMobility I** An all-in-one solution that includes an electric lease car, home/office charging facilities, consulting or advice and billing





#### Our supply chain

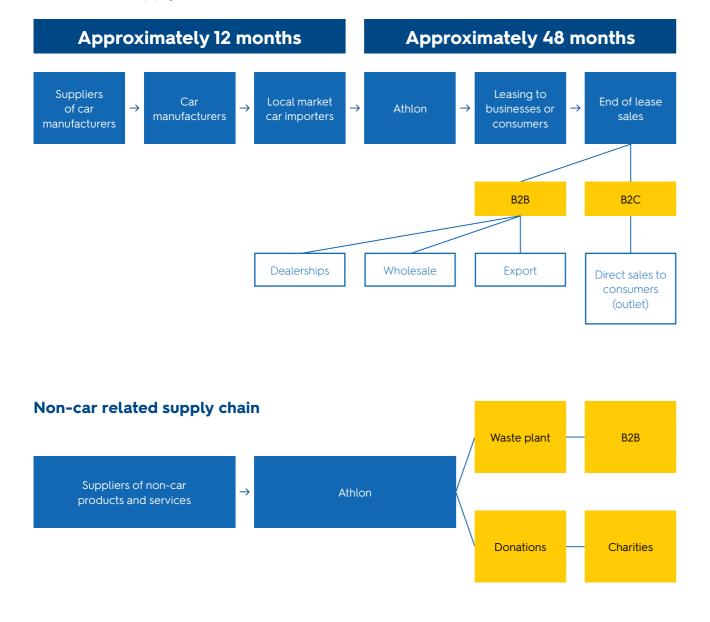
We have two major supply chains, one which is car related and one which is non-car related. Our procurement department is organized accordingly. It is important to note that our car-related supply chain is significantly longer than our non-car related supply chain.

The first includes car manufacturers and their suppliers, up until the parties involved in buying and reselling 'end-of-life' leasing vehicles. Athlon has the most impact on the supply chain during the approximately 48 month

period in which a car can be considered one of our own assets. Before that period, and afterwards, our impact on the other links in the supply chain is limited.

The non-car related supply chain is less complex. It is made up of a diverse group of suppliers of products and services meant to keep our operations running smoothly (e.g. electricity, paper, coffee...). In most cases we work with wholesale businesses or directly with the manufacturer.

#### Car related supply chain







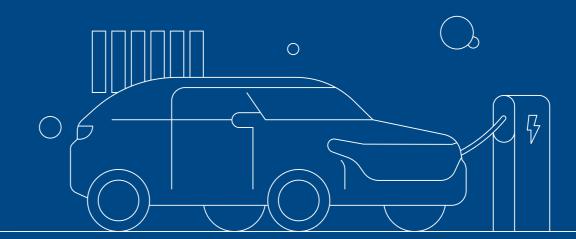
# 2.

## Scorecard Sustainability

Sustainability and CSR scorecard

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# Sustainability and CSR scorecard



#### **Climate action**



#### **Road safety**



#### **Community engagement**



#### Vital people



#### Diversity, equity and inclusion





# 03.

# Our Sustainability & CSR Strategy

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#### Always start with the "why"

#### Alexander Heijkamp, Sustainability and Corporate Social Responsibility (CSR) Director

'Sustainability has become a top priority for businesses all over the world. If we want to limit the impact of climate change, we need to decarbonize our economies – including our transport. Research shows that cars and vans account for 16% of the EU's overall greenhouse gas emissions. As Athlon owns a fleet of approximately 400,000 cars and vans, we have a big responsibility to rethink mobility and reduce emissions. Our answer: electrification and more flexibility. **Now is the right time to change the game in mobility.**'

'That's why governments subsidize electric vehicles (EVs), regulation favors them, employees demand them, and companies are increasingly enthusiastic about them. Especially as electric mobility approaches – and in many cases already surpasses – cost parity with vehicles with an internal combustion engine (ICEs).'

'Europe's shift towards EVs consists of pulls – for instance subsidies – and pushes, such as emissions targets for manufacturers in the automotive industry. And what's more: reporting on sustainability will soon be mandatory for medium and large companies.'

#### **Proof of the pudding**

'So where to start? And what to do next? Organizations need to map out their own route to a fully electric fleet. Today everybody is electrifying, but not always at the same pace. And that's okay, since flexibility and pivoting are key to change habits and adopt to the new normal in mobility.'

'In 2021, I took the proof of the pudding and drove 12,000 kilometers through Europe, fully electric. I visited all Athlon markets to spread the word about our sustainability and CSR storyline and to speed up our movement. Changing to sustainable mobility is not just about switching to EVs – that, I strongly believe in. It is simply too easy to order an EV instead of an ICE vehicle. No, what truly matters is the availability of the most appropriate sustainable mode of transport, anytime and anyplace.'

'In some cases an e-bike or travelling by train can be a better option. I have experienced myself, however, that driving fully electric is already possible in every European Athlon market. It is even quite easy to do. With just one charge tag and an app you can rely on the car's navigation, which features real-time intelligence on your trip and on the availability of charging stations. In fact, that's where real change starts: by being willing to change your habits and lead by example.'

#### Step up to the plate

'At Athlon, we decided to make a distinction between sustainability and Corporate Social Responsibility (CSR) because we see them as different topics. Different, but strongly connected. Our Business Value Proposition (outside world) is inextricably linked with our Employer Value Proposition (inside world). We believe we need both to do what we say and say what we do in a credible way.'

'That's why in addition to sustainability, we also care about CSR. So what does Athlon do other than creating sustainable mobility, you ask? Well, we give back to society, for instance by planting trees together with the Dutch organization 'Trees for All'. We take care of those who don't have the same chances we have by offering job application training. Or more focused on our own Athlon family: we help our members with their mental and physical vitality. And we are a diverse and inclusive group of people with equity for each member. All this makes me a proud member of this family.'

'More and more people agree that the time has come for major change. Change in vision, in approach and in the behavior of both people and organizations.

Evolution or revolution – one thing is crystal clear to me: we are on the cusp of a shift to a new economy. An economy where individual returns go hand in hand with the impact of those returns on society. The world needs businesses to step up to the plate and tackle the major challenges of our time. Let's change the game in mobility together!'



#### Creating sustainable shared value: our impact areas

By organizing sustainable mobility and making it a reality, we create sustainable shared value for our business, our customers, the planet, our members and all the people we connect with. We will make this sustainability mission a reality by tackling 5 impact areas: 'climate action', 'road safety', 'community engagement', 'vital people' and 'diversity, equity and inclusion'.



#### Connecting sustainability to CSR

Our strategy focuses both on sustainability and CSR. This is why we make a distinction between them:

- → With our sustainability strategy we **guide our customers** towards a sustainable and flexible future in mobility. Helping them get there, is our Business Value Proposition. In our view, sustainability is all about **lowering the CO**, **footprint** of our organization and making our customers join us. The domains in which we can have an important impact here, are **climate action** and **road safety**. This is where customers count on us.
- → With our CSR strategy we want to be the **employer** of choice in mobility. This is our Employer Value Proposition: to contribute to society and help our employees become the best version of themselves. CSR concerns vital people, as we focus on the physical and mental vitality of our employees. CSR also encompasses diversity, equity and inclusion. These are our five impact areas. And last but not least, CSR is about community **engagement:** we encourage Athlon members to give something back to society.

Life is easier and business is better when it makes sense. For that reason, we connect all sustainability and CSR dots in our strategy, internally as well as externally. Since we focus on sustainability and CSR, Athlon is able to create sustainable shared value both on external and internal side. As is shown further on in this report, we defined clear goals for each impact area.

Our strategy is based on the Golden Circle approach by Simon Sinek: always start the 'why', then explain 'how' you will do this and finally focus on 'what' solutions you offer to customers. We believe our customers don't buy what we are selling, they buy why we are selling it. The same goes for our employees: we want them to work at Athlon because they subscribe to our purpose.

#### **Work in progress**

We started in 2020 with the development of an international sustainability and CSR vision, mission and strategy for 2021-2025. Our main goal: to have a group level focus, use the same messages and wording and share knowledge and best practices with each other to achieve long-term objectives at group level.

We launched Athlon's international sustainability and CSR strategy in May 2021. Our work has already begun and will be sped up over the next years. Not only because our stakeholders demand this: we are committed to making it happen. In 2022 we will focus on building an internal knowledge sharing network including sustainability and CSR change makers from every Athlon market.

The network consists of Athlon employees who are intrinsically motivated to contribute to the shift to a more sustainable world. In some bigger Athlon markets this comes with a formal role, in others our people take this commitment on the side. In the end: sustainability and CSR are the responsibility of everyone within Athlon. By frequently sharing knowledge, experiences and inspiration, we aim to become better and more impactful every day. One team to win this race.



#### Our contribution to the SDGs

When it comes to business impact on society, it is important to speak a common language. The UN Sustainable Development Goals – aka SDGs or Global Goals – provide such a language. The SDGs consist of 17 goals and 169 underlying targets created to banish global problems like climate change, inequity, hunger and poverty by 2030. In other words: to realize the United Nation's Agenda 2030-program. Globally, 195 countries have committed to the SDGs.

Athlon links its sustainability strategy to the SDGs to be able to define its impact on society. This helps us, along with our stakeholders, to contribute to a better and more sustainable world.

The SDGs are an indivisible whole: all are of equal importance. However, an organization can never create impact on every SDG. For this reason, we used the method of the materiality matrix to decide where we have a high impact combined with a high level of importance for our stakeholders.

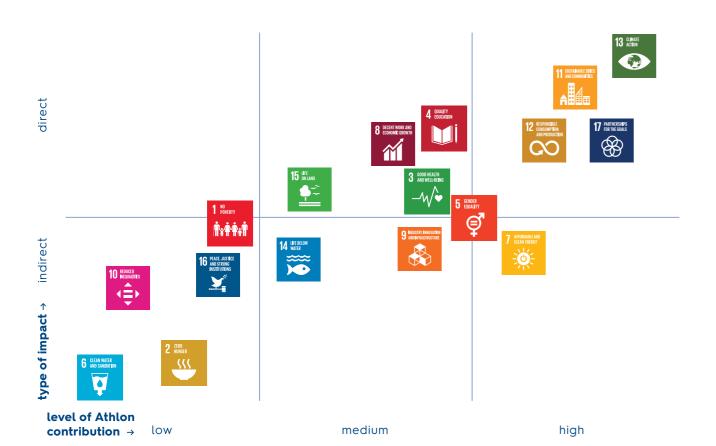
Following this method, we decided to focus on the SDGs on which we can have the most impact:

- → **SDG11**: Sustainable Cities and Communities
- → **SDG12:** Responsible Consumption and Production
- → **SDG13**: Climate Action
- → **SDG17:** Partnerships for the Goals

Through our impact areas 3 (community engagement), 4 (vital people) and 5 (diversity, equity and inclusion), we also have an indirect impact on:

- → **SDG3:** Good Health and Well-Being
- → **SDG4:** Quality Education
- → **SDG5**: Gender Equality
- → **SDG8:** Decent Work and Economic Growth

We will periodically revise this materiality matrix with a group of stakeholders.





## Tell us what moves you



Climate action



Road safety



Community engagement



Vital people



Diversity, equity and inclusion



# Our Impact Areas

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Diversity equity and inclusion	1.6

#### Climate action - A healthy planet

#### Why are we engaging with this?

Mobility accounts for a quarter of greenhouse gas emissions in the European Union. To make the EU climate neutral, the ambition of the European Green Deal, transport emissions must be reduced by 90%: an enormous challenge. Our mobility also harms the planet and the environment in other ways. According to the European Environment Agency, travel to work is the main cause of NOx emissions in European cities. Traffic increases our exposure to fine particulate matter, which leads to a rise in acute respiratory infections, chronic respiratory diseases and cardiovascular disorders. Moreover, noise pollution from traffic has negative effects on our physical and mental health.

The way we travel has to fundamentally change. From the petrol-engine car as the standard means of transport to alternatives that are better for the planet, such as the electric car, the e-bike or electric scooter, the bicycle, public transport, car sharing and fewer journeys altogether.

#### Our contribution to the solution

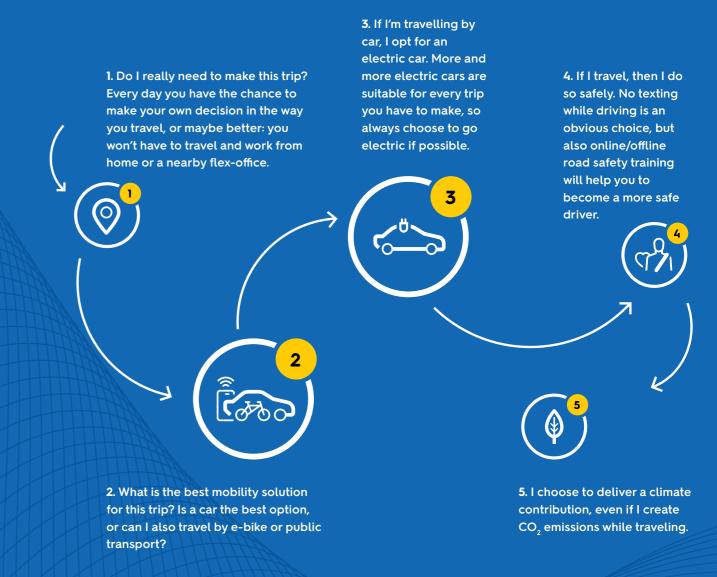
Athlon supports companies to approach their employee mobility differently and in a more sustainable way. Our mobility solutions allow businesses to implement sustainability at a practical level in their business operations and thus become future-proof.

We do this by encouraging our members to opt for an electric car (BEV) or plug-in hybrid (PHEV) and/or to make use of an electric bike or public transport. In addition, we offer advice and life-long learning about driving more sustainably and safely. We lead by example, by opting for sustainable transport wherever possible and ensuring that our company buildings are carbon neutral.

In this way, we not only help our customers to comply with the climate goals and other climate legislation, but we also contribute to their sustainable reputation and positive employer branding.

#### Rethink travel behavior every day

Athlon is introducing a working from home policy that assumes 50% on average working from home to reduce commuter traffic. With our 'Fivestep mobility plan' we encourage our members and customers to approach every trip based on a well-defined hierarchy:







#### **Our targets and commitments**

Our ambition is to make the entire Athlon fleet CO<sub>2</sub> emission free.

By the end of 2022 we will make all Athlon offices and locations carbon neutral.

#### By 2025:

- → 50% of the Athlon customer fleet is entirely or partly electric (xEV)
- → 100% of the employee fleet is entirely or partly electric (xEV)
- → the average CO<sub>2</sub> tailpipe emissions in our customer fleet is 50 g/km
- → the average CO<sub>2</sub> tailpipe emissions in our employee fleet is 0 g/km



#### **KPIs**

In order to monitor and steer our progress, we created key performance indicators (KPIs) which relate directly to our commitments. These KPIs allow us to compare each Athlon market on its performance and learn from the frontrunners on specific topics. Insights and developments on performance will be shared frequently within the change makers' knowledge

sharing network. Every two months, the Athlon Management Board also discusses the developments during a market sounding board.

The KPI dashboard on sustainability and CSR is updated every month, mostly automatically and based on data sources with real-time information.



#### Our progress

We started measuring the impact areas in which our footprint is most significant: the emissions caused by vehicles used by our customers (scope 3). Although our customers will account for these emissions in their own  ${\rm CO_2}$  footprint, we feel it is our responsibility to steer them in the right direction.

With a share of 14% entirely or partly electric vehicles (xEV) in our customer fleet in 2021, we still have a gap to bridge to reach our 50% target in 2025. Due to the shortage of microchips, the growth in the share of these vehicles was slower than expected last year. In 2022 we aim to catch up and double the percentage of xEVs in our fleet. To achieve this ambition, strategic procurement and the availability of these vehicles are conditional requirements.

In 2021, 39% of our employee fleet was entirely or partly electric. This means that also on this target – 100% xEV by 2025 – we still have some distance to cover.

On a different note, Athlon continued to focus on the electrification of both its employee and customer fleet. In 2021, respectively 18% and 7% of vehicles in our fleet were fully electric.

Together with Mercedes-Benz Mobility, Athlon also started a Green Office Initiative. Our main goal: having  $\mathrm{CO}_2$  neutral offices by the end of 2022. The current state of affairs: in 2021, over 66% of our offices and locations were carbon neutral. Concrete actions for this target are a shift to renewable energy as soon as possible and a compensation of  $\mathrm{CO}_2$  emissions in the meantime.

#### Actions and initiatives 2021: a selection

#### Action 1

#### One lease = one tree (Athlon Sweden)

For this initiative, we teamed up with the Swedish organization 'Vi-skogen', that fights deforestation and poverty in eastern Africa. For every vehicle we lease in Sweden, our partner plants a tree. This way we help local farmers who in many ways depend on trees for their livelihoods. With over 4,000 trees planted in the region since 2019, we also help to contribute to a healthier planet.

#### Action 2

#### Speeding up sustainability through a Mobility Budget (Athlon Belgium)

Athlon wants to play a pioneering role in the Mobility Budget, both within our own company and for our customers. The Mobility Budget is an initiative by the Belgian authorities which allows employees to exchange their company car for an annual budget. This budget can be spent on a more environment-friendly company car, on sustainable means of transportation and on housing costs. If the budget is not fully spent, the surplus is paid as a cash bonus.

We set up a core team with colleagues from different departments to figure out the calculation of the budget and the application of the procedure. This was often challenging, as the rules and regulations regarding the Mobility Budget were unclear for a long time.

Today, the experience we built up during the implementation of the Mobility Budget internally, helps us to advise our customers. Supporting them to roll out the budget in their own company is now an important task for our consultancy department, which was set up in 2020. It contributes to the core activity of this department: guiding our customers towards a greener fleet.



### Road safety - Travelling more safely, every day

#### Why are we engaging with this?

European roads are among the safest in the world. In recent decades, road safety has improved significantly. In 2020 there were some 42 road fatalities per million inhabitants in Europe, which represents a 17% decrease since 2019 and a 36% decrease since 2010. However, this still means an annual toll of almost 19,000 road deaths and multiple cases of severe injury: human suffering and a huge social cost that we should be able to prevent.

The figures vary greatly per country and the reduction we saw in 2020 was strongly influenced by the fact that we travelled less in 2020. The EU wants to reduce the number of road deaths to almost zero by 2050 by investing in safe road infrastructure, vehicle safety and safe driving (Vision Zero strategy). This goal has not yet been achieved, so greater efforts are needed.

#### Our contribution to the solution

Thanks to our size, Athlon can help to make a difference in the EU's Vision Zero strategy. We see it as our responsibility to put safe company cars on the road and to promote and implement safe and responsible driving, both for our own members and for our customers. With the help of online and offline training courses and awareness campaigns, we help our customers to prevent traffic accidents and to improve the traffic safety of their members as part of being a good employer.

We also encourage both our customers and our own members to drive safely. That is why road safety is an important part in our 'Five-step mobility plan'. In order to have greater influence locally, we collaborate with partners engaged in promoting safe commuting in their region or country. With these initiatives, we contribute to traffic safety in the whole of Europe.

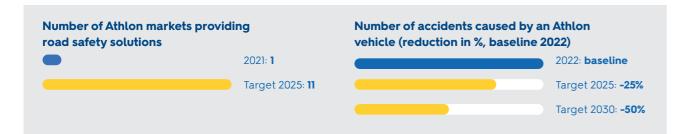
#### **Our targets and commitments**

It is our ambition to reduce the number of road accidents caused by an Athlon vehicle (accidents resulting in physical injury to the driver or a third party) to zero. By 2025, we will reduce the number of accidents caused by an Athlon vehicle by 25% compared to 2022, and by 50% by 2030.





#### **KPIs**



#### **Our progress**

In the second half of 2021, Athlon has contacted several suppliers of road safety solutions such as no-texting-while-driving apps. A pilot group of our members tested these solutions to see which are best for both our employees and customers. It is our goal to provide such road safety solutions to customers in every Athlon market. In 2022, we will reach out to European road safety associations as well, to join forces. Together we will work on realizing the ambitions of the European Vision Zero strategy.

To contribute to the main goal of that strategy – almost zero road fatalities in the EU by 2050 – Athlon has set its own targets. We focus on reducing the number of accidents caused by an Athlon vehicle by 25% compared to 2022, and by 50% by 2030. To monitor our progress on that target, data collection starts in 2022. Every Athlon market has to deliver data on accidents caused by our vehicles.

#### Actions and initiatives 2021: a selection

#### Action 1

#### Annual Road Safety training (Athlon Poland)

90% of collisions on the road are due to errors made by drivers themselves. We believe that by training, we can improve the safe driving skills of our clients' employees in Poland. Since 2018, we offer courses on how to drive safely to our customers in Poland and their employees. Each year they have the opportunity to enhance their safe driving skills by practicing on a track under the supervision of professional trainers.

We also believe innovative technologies can have an important impact on drivers' behavior. Technologies like lane departure alerts and onboard cameras can help you become a safer driver if you know how to use them correctly. We therefore invest a lot of effort in R&D-activities so data can support our USP. Furthermore, we prepared and secured resources for telematics projects with the potential to change the behavior of drivers and increase road safety.

#### Action 2

#### Tyre Safety Week and Road Safety Week (Athlon UK)

The Tyre Safety Month in the UK highlights the importance of tyres for road safety. An ideal occasion for Athlon to organize an entire week of fun activities at our UK offices and raise awareness amongst our team members. Together with our tyre fitting partner KwikFit, we proposed several activities such as a free tyre check, demonstrations and a road safety quiz. A surprise visit from 'Bibendum' – aka Michelin Man – made the day an even greater experience, which our UK team can now share with their customers and drivers.

In November 2021, Athlon UK also joined the National Road Safety Week. By supporting initiatives like these and building on national campaigns, we raise awareness among our employees and customers on the importance of road safety for drivers, passengers and other road users.



#### Why are we engaging with this?

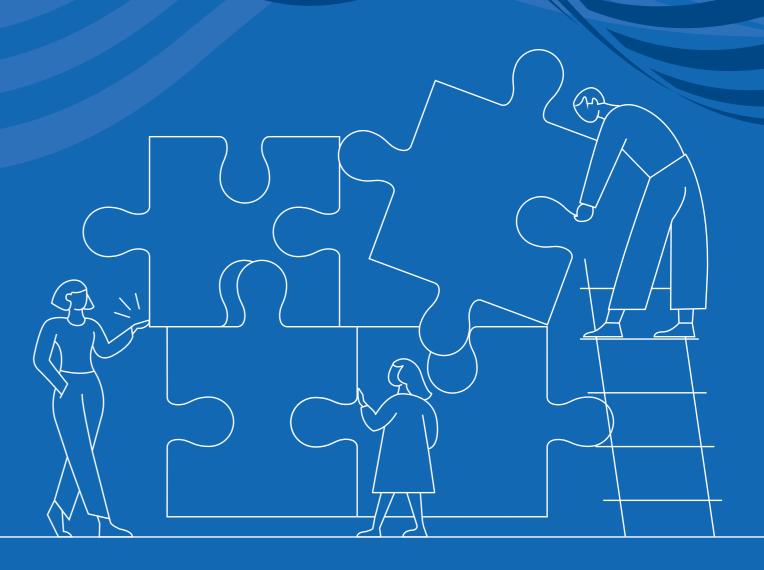
The equality of all people is enshrined in many international treaties. Moreover, equality before the law is a universal right in national laws and in the EU. And yet in practice, equal opportunities for everyone are far from

a reality. People, or groups of people, are still treated unequally and are not given a fair chance to participate fully in social and economic life.

#### Our contribution to the solution

We are convinced that companies should have a wider social purpose beyond striving for economic profit and jobs. Our aim is to have a positive impact on the local communities where we operate. At Athlon we support charities, but do not confine ourselves to financial support alone. We strive to make our knowledge and expertise of sustainable mobility available as widely as possible. Along with our members, we set up an extensive volunteering program, with mobility, climate action and equal opportunities as central themes. In addition, we undertake initiatives designed to give children and young people with a migrant background, for example, or poor language skills, a fair opportunity to progress. In doing so, we always opt for structural collaborations with partners in the field who are close to the target group.

Athlon offers employees the opportunity to volunteer 2 days a year. To make this as accessible as possible, some markets already work with a so-called Athlon Social Impact platform, where all possible volunteer activities are listed. Other Athlon markets work closely with local volunteer organizations and focus on one goal. Others organize an annual activity themselves, in line with the local needs at the time. Our main goal is to create a positive impact on society, especially for those who don't have the same chances in life as others have.





#### **Our targets and commitments**

Our ambition is for all Athlon members to participate actively in a volunteering program by 2025. All Athlon members are encouraged to work 2 days per year as volunteers. At least half of the volunteering days undertaken are devoted to working towards equal opportunities in society.



#### **KPIs**



#### Our progress

Athlon allows its members to work 2 days a year as a volunteer. Our ambition is for all our employees to participate actively in our volunteering program by 2025. Today, every Athlon market still chooses its own focus based on its local situation and cooperation with local charities. Athlon Netherlands was a frontrunner on this impact domain, keeping records of which share of its members takes part in voluntary initiatives. Since 2021 however, these data are kept by all Athlon markets.

The same goes for the total hours of voluntary work executed by our members. In 2021 the entire Athlon group ticked off at a total of 1,482 hours performed by 286 members (= 18% of all members). Our goal is to arrive at 12,500 hours of voluntary work at Athlon by 2025.

What we have learned so far? The more effort an Athlon market puts into making voluntary work easily available, the more hours are put in. For example, Athlon Netherlands created an online platform where voluntary initiatives are just one click away, boosting participation.

The platform is available for members of Athlon Netherlands as well as Athlon International. So next on our agenda is sharing it with other Athlon markets as well. We also work on a central approach of this impact domain. In the next years it will be possible to share ideas via an online network to define a central theme or type of project for all our members to support.

#### Actions and initiatives 2021: a selection

#### Action 1

#### Forestry project in Almere (Athlon Netherlands)

The Dutch organization 'Staatsbosbeheer' is responsible for protecting nature and forests in the Netherlands. As only 15% of the Netherlands still consists of nature, their goal is to create more green space for everyone.

At one of their reforestation projects, in the city of Almere, newly planted ash trees were threatened to be overgrown by other vegetation. Athlon Netherlands decided to help. By pruning away weeds and other plants, our Dutch team gave the ash trees the space they need to flourish. While these trees grow over the next years, they will absorb CO<sub>2</sub> emissions and help counter global warming.

196 Athlon volunteers were involved in this project, investing 862 hours of work in Almere's green surroundings. In total, 224 Athlon Netherlands volunteers spent 1,272 hours on voluntary work via the Athlon Social Impact platform in 2021.

#### Action 2

#### Fuel vouchers for charity (Athlon Germany)

At the turn of the year 2020/2021, Athlon Germany supported 5 organizations in the Düsseldorf area that provide help to others and use vehicles to do so. The organizations - which reach out to people and animals in need – received fuel vouchers worth a total of € 4,300. The initiative was part of the German #gemeinsam-campaign.





#### Vital people - Healthy and vital members

#### Why are we engaging with this?

Our people are happier and more resilient if they are healthy and vital. What is more, vital members are also less frequently ill, perform better, and create a positive work atmosphere. They contribute to the resilience of our company and its capacity to respond flexibly to changes. A vital organization is better able to deal with a rapidly changing world. And the world of mobility is changing rapidly.

Athlon employs around 1,550 people. Their commitment and engagement are the key to our company's success. As an employer, Athlon feels responsible for the health and wellbeing of all its members.

#### Our contribution to the solution

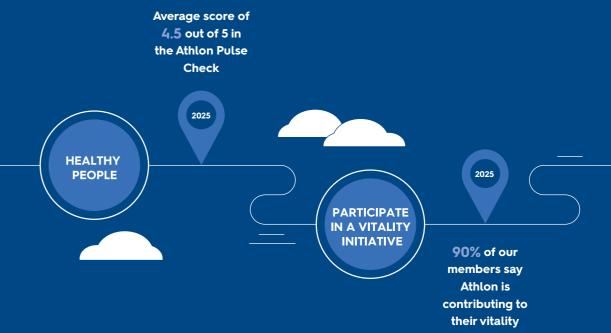
At Athlon, vitality is an integral part of our company culture. This makes us an attractive employer with high employee satisfaction, as is shown by several surveys. Our goal is to offer 'work that works for our people' and → increase their mental resilience (better sleep, to actively help our members find a healthy work-life balance. In this way, we ensure that they remain healthy and vital. We aim to start an Athlon Vitality Program in all the countries where we operate.

That program encourages our members to:

- → improve their physical condition (exercise, healthy food, workplace and attitude to work)
- coping with work pressure and stress, relaxation)
- → achieve a better work-life balance (culture, teleworking policy, setting boundaries)

#### **Our targets and commitments**

We are striving for an annual increase in employee satisfaction. We aim for an average score of 4.5 out of 5 in the Athlon Pulse Check survey by 2025. By 2025, 90% of our members will say that Athlon is contributing to their vitality.





#### **KPIs**



#### **Our progress**

To monitor our progress on the vitality target concerning employee satisfaction, we conducted an online Pulse Check survey in 2021, resulting in an average score of 3.4 (out of 5) as to how Athlon contributes to the mental and physical vitality of its employees. Our goal is to arrive at a score of 4.5 by 2025. We also want 90% of our members to say that Athlon is contributing to their vitality in this survey (in 2025)

The Pulse Check is part of every local and central member meeting. At Athlon International new survey questions have been defined in order to gain insights in trends in the mental and physical well-being of our entire group. Data collection on this starts in 2022

#### Actions and initiatives 2021: a selection

#### Action 1

#### Athlon Vitality Program (Athlon Netherlands - Athlon International)

Together with a partner, the Dutch insurance company a.s.r. Vitality, Athlon Netherlands started a vitality program for its own members and the members of Athlon International. The CCO of Athlon Netherlands and a Dutch Olympic champion in snowboarding hosted the kick-off of the program. During an inspiring webinar, they discussed the importance of vitality.

Every Athlon member was invited to join the vitality program in which you can earn points via activities such as walking or exercising, doing a health check or even trying to stop smoking. The members can use these points to buy goodies or to make a donation to charity. At the end of the first year (2021) 48% of the Athlon Netherlands members and 35% of the Athlon International members joined the program.

#### Action :

#### Physical activities during lunchbreak (Athlon Sweden)

Athlon Sweden invited their home office workers to participate in physical activities during their lunchbreaks. The objective: getting our people from behind their desks and encouraging them to be (even more) active. Examples of popular sports during lunch were running, crossfit and padel. To get everyone on board, Athlon Sweden hosted padel tournaments and charity runs.



#### Diversity, equity and inclusion on the work floor

#### Why are we engaging with this?

Soon, companies will only be granted their license to operate if they embrace diversity (in gender, ethnic and cultural background, age, etc.), equity and inclusion. There is also growing evidence that companies with a strong diversity, equity and inclusion policy are more

successful and more profitable. Yet we are still not where we need to be, and diversity, equity and inclusion remain topics that deserve greater attention in the business world and in our company.

#### Our contribution to the solution

As a company, Athlon aims to reflect society. Our goal is to be a business where a diverse range of talented people feel welcome and at home, regardless of their world view. We see differences between people as an opportunity for growth and development, both for our individual members and for our company. Our members are allowed to be themselves and different insights or cultural models are viewed without prejudice and even encouraged. By being a diverse and inclusive company, we can also better serve our customers where the same groups are represented.

Our diversity, equity and inclusion strategy focuses on:

- → Culture: to truly learn from one another, we are strengthening our company culture and further sharpening our focus on people and good leadership. By talking openly, we learn to get along with one another and behave in accordance with our company values.
- → Work-life balance: a good balance between work and private life contributes to diversity and inclusion. That's why we are focusing on commitment, trust, mentoring, smart working and flexible working conditions.
- → Generation management: to continue to work innovatively and creatively, our teams are made up of people of different ages as much as possible.

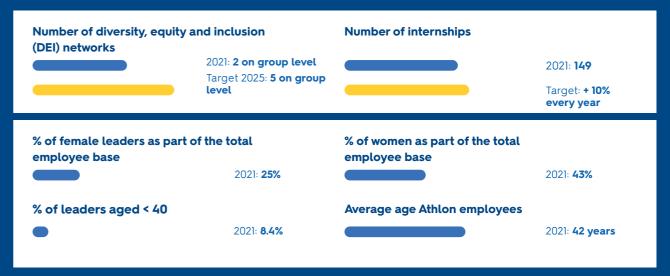
#### **Our targets and commitments**

We ensure that all Athlon teams reflect the local community in the country where they work. A minimum of 5 thematic networks on diversity and inclusion will have been set up by 2025, which will focus on exchanging knowledge and mutual inspiration.

#### 2025 **ATHLON TEAMS REFLECT THE** LOCAL **COMMUNITY** A minimum of 5 DEI networks on group level

**Number of internships increases** by 10% every year

#### **KPIs**



#### **Our progress**

Our main target on diversity, equity and inclusion is for all Athlon teams to reflect the local community in the country where they work. We will monitor several indicators in order to manage the progress on this impact domain.

The first two indicators focus on gender: the percentage of women (43% in 2021) and female leaders (25% in 2021) as part of the total employee base. To reflect the local community, we also want to increase the number of 'younger' employees. In 2021, 8.4% of our leaders was aged under 40. In every country we operate, the average age of Athlon members has to mirror society by As a 4th KPI we want to raise the number of internships within Athlon by 10% compared to each previous year, starting in 2022. This way we want to give opportunities to diploma students and doctoral students aspiring a career in sustainable mobility solutions. In turn, these young people encourage us to keep innovating.

The last indicator on this impact domain concerns our diversity, equity and inclusion (DEI) networks. A minimum of five thematic networks around diversity and inclusion will have been set up by 2025, which will be focused on exchanging knowledge and mutual inspiration.





#### Actions and initiatives 2021: a selection

#### Action 1

#### Unconscious bias-training and webinar (Athlon International)

In 2021, every manager at Athlon International was offered the opportunity to follow a training on unconscious biases, which as human beings, we all have. The training sessions were organized by our diversity, equity and inclusion group (DEI), and were meant to create awareness on biases which can cause us to react to certain situations in a particular, illogical way. This year this training will also be available for the rest of the Athlon team.

Another initiative was a live webinar for all our members, coordinated by Athlon International and Athlon Netherlands. Our sustainability and CSR manager Alexander Heijkamp hosted the webinar: an inspiring dialogue between the DEI ambassador of the Athlon Management Board, Youssef Saïdi, and the Dutch writer and publicist Abdelkader Benali. They discussed the importance of being a diverse and inclusive organization, and introduced the 'Open Hearted' card game. The game enables Athlon members to start or end a formal meeting using funny and surprising questions.

#### Action 2

#### Work-life balance reinvented and social work (Athlon Spain)

Our team in Spain cooperates with the Spanish charity organization Caritas on three important domains within our diversity, equity and inclusion strategy.

Firstly, together they made a concrete plan to reinvent our work model after the pandemic and find a new balance between personal life and work.

Secondly, we promoted inclusion actions within as well as outside the company. An example of a first action is the launch of a hybrid working model which allows our members to work from home. Another action focused on the impact we can have outside the company, as we made a donation to a Caritas center for the homeless.

For the third domain, we created a plan which allows Athlon employees to volunteer in Caritas' social actions once a month. Our human resources department in Spain can now coach people who are being socially reintegrated, for instance by practicing job interviews. We also asked our supply chain to step in and join us. As a result, we started to cooperate with 2 new suppliers that only work with people with disabilities.







# 05.

## Governance: How We Organize Sustainability

Corporate governance	52
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Towards a sustainable supply chain	54
Certification	55

Sustainability and CSR Report 2021

#### Corporate governance

Our codes concerning corporate governance have been established in accordance with the Universal Declaration of Human Rights and the Global Compact of the United Nations, the Guidelines for Multinational Enterprises of the Organization for Economic Co-operation and Development (OECD) and the conventions of the International Labour Organization (ILO).

With these standards Athlon applies the same provisions concerning labor standards, business ethics, environmental protection and safety to its own business operations. We implement the standards by means of our Integrity Code, our Principles of Social Responsibility and our environmental and energy policies.

Athlon also developed a Declaration on the Principles of Sustainability and Corporate Social Responsibility which describes who we are as an organization, what we stand for and what our commitment is to our customers and society. It contains our commitments as well as our focus on the 5 most important impact areas and the connection to the SDGs of the UN.

On top of that, we have our own Code of Conduct which is based on the Mercedes-Benz Integrity Code and the Mercedes-Benz Supplier Sustainability Standards which are applicable for the Athlon Group. Our Code of Conduct guides us in how we want to do business with our customers and our suppliers. It includes principles on topics such as corruption, anti-bribery and fair competition.

#### **Data protection**

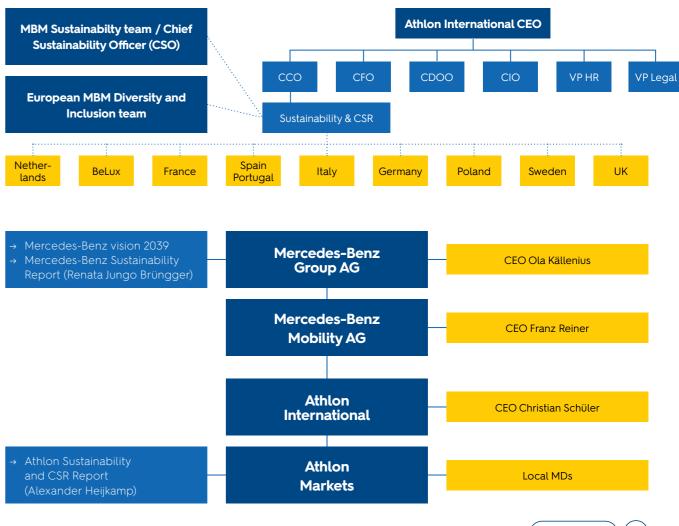
We understand data are key for both our customers and our internal organization. Athlon's data protection plan is based on the European Union's Data Protection Directive (GDPR) and is applicable in every Athlon market. Based on the Data Protection Policy EU A 17.2 and the Global Data and Information Policy, data protection is an integral part of our business operations.

### Our sustainability team and management approach

Switching to sustainable mobility is one of the biggest challenges of our time. Challenging, but not impossible: the necessary transformation from a traditional leasing company to a sustainable and innovative mobility provider can be realized in every Athlon market. That is why we organize the key domains of sustainability and CSR on international level as well as locally, in our markets.

However, not every Athlon market is big enough to appoint a local Sustainability and CSR Manager. In such cases, extra support from Athlon International is available. Athlon International cooperates closely with Business Development and Marketing, but also with HR, Operations and Procurement.

Our sustainability approach is part of our intensive collaboration with Mercedes-Benz Mobility AG and the Mercedes-Benz Group AG. Athlon International's Sustainability and CSR Director is responsible for maintaining the internal network within the group and sharing knowledge and information with local Athlon markets. Therefore, he is part of the Sustainability team within MBM and also Diversity and Inclusion (D&I) Lead member of the European MBM D&I Core Team. This way, we are building a learning network organization within





#### Towards a sustainable supply chain

Athlon wants to encourage its suppliers to take action and responsibility for their part of the supply chain. Since our suppliers also have sustainability and CSR high on the agenda, just as we do, this strengthens our cooperation. For us, the performance on these topics is always one of the criteria when starting or continuing a relationship with suppliers. We created specific standards and declarations to inspire, engage and monitor our supply chain.

#### Mercedes-Benz Sustainability Supplier Standards

Since November 2020 Athlon requires every supplier to commit to the Mercedes-Benz Sustainability Supplier Standards. These standards include requirements for all suppliers regarding human rights, labor standards, business ethics, environmental protection and safety. They are applied worldwide and directed at product suppliers as well as service providers. The contents of this document are incorporated into our contracts with suppliers.

The standards serve as a guideline to create a sustainable supply chain. They define our requirements for working conditions, respecting and upholding human rights, environmental protection, safety, business ethics, and compliance. Our compliance officers are constantly working together with the procurement department on this topic. An open dialogue with our supply chain partners is needed to be able to co-create new sustainable solutions.

Suppliers are required to communicate the content of this document to their own suppliers, obligate them to respect the same standards and verify that these Sustainability Standards are adhered to throughout the supply chain. In this way Athlon works on a sustainable supply chain.

Athlon approaches the supply chain with a clear focus on: Car Related Procurement and Non-Car Related Procurement.



#### Certification

At Athlon we want to contribute to making the world a better place, day after day. Not only with respect to the fight against climate change, but also regarding people and society. We defined a clear vision, mission and strategy to fulfill this ambition. As always, however, the proof is in the pudding.

For that reason we want to have our actions certified. An external certificate encourages us to improve continuously, setting new goals every year. It also allows us to learn from other organizations and join forces with customers and suppliers. After all: Athlon and its stakeholders form a large supply chain and together we can make things move.

We obtained sustainability and CSR certificates both on group level and in our local markets. The next years we will keep up the good work. Each year we try to do better than the year before in order to acquire an Ecovadis certificate in our local markets.

#### **Athlon Markets**

- → Athlon Netherlands: Ecovadis (Gold)
- → Athlon Netherlands: FIRA Netherlands
- → Athlon Belgium: SDG Pioneer Belgium







#### **Ecovadis Athlon International: on the right track!**

In March 2022 Ecovadis confirmed that as a group, we are on the right path in becoming a sustainable organization. We received compliments for the policies and strategies we have implemented and were pointed out the areas for improvement. These recommendations will help us in taking the next steps towards our goal to reach the Gold medal status in 2025.

Why hasn't Athlon International received a medal, just yet? Well, we only recently started to measure, steer and report on our sustainability performance. We are on the right track however. This Ecovadis assessment gives us concrete guidance in how to move forward.

#### **GRI Standards Reference Table**

Gener	al disclosures 2016		
GRI	GRI Description	Disclosure	Page
Organiza	ational profile		
102-1	Name of the organization	Athlon Car Lease International B.V.	
102-2	Activities, brands, products and services	Our company > Athlon at a glance Our company > Our products and services	6-7 10-11
102-3	Location of headquarters	Athlon Car Lease International B.V. – Stationsplein Noord-Oost 414, 1117 CL Schiphol Visiting address: Veluwezoom 4, Postbus 60250, 1320 AH Almere	
102-4	Location of operations	Our company > Athlon at a glance	6-7
102-5	Ownership and legal form	Athlon Car Lease International B.V. Our company > Athlon at a glance	6-7
102-6	Markets served	Our company > Athlon at a glance	6-7
102-7	Scale of the organization	Our company > Athlon at a glance	6-7
102-8	Information on employees and other workers	Our company > Athlon at a glance	6-7
102-9	Supply chain	Our company > Our supply chain	12-13
102-10	Significant changes to the organisation and its supply chain	Not applicable (first report)	
102-11	Precautionary Principle of approach	Annexe 2: Athlon International Code of Conduct	62
102-12	External initiatives	Our company > Our mission, vision and values	8-9
102-13	Membership of associations	Not yet applicable. In 2022, we start working on international partnerships at the group level.	
Strategy			
102-14	Statement from senior decision-maker	CEO-interview - Our sustainable strategy > Always start with the way	20-21
Ethics an	d integrity		
102-16	Values, principles, standards and norms of behavior	Our company > Our mission, vision and values Governance > Corporate governance	8-9 52
Ethics an	d integrity		
102-18	Governance structure	Governance > Sustainability team and management approach	53

GRI	GRI Description	Disclosure	Page
Stakehol	der engagement		
102-40	List of stakeholder groups	The format of this first report is based on the materiality matrix in the Dutch report (Corporate Social Responsibility, Athlon Nederland 2020). We plan a new stakeholder consultation at group level in the near future.	
102-41	Collective bargaining agreements	Information on the collective bargaining agreements is not centrally available.	
102-42	Identifying and selecting stakeholders	The format of this first report is based on the	
102-43	Approach to stakeholder engagement	materiality matrix in the Dutch report (Corporate Social Responsibility, Athlon Nederland 2020). We plan a new stakeholder consultation at	
102-44	Key topics and concerns raised	group level in the near future.	
Reporting	g practice		
102-45	Entities included in the consolidated financial statements	Our company > Athlon at a glance Governance > Sustainability team and manage- ment approach	6-7 53
102-46	Defining report content and topic Boundaries	Our sustainable strategy > Creating sustainable shared value: our impact areas Our sustainable strategy > Our contribution to the SDG's	22-23 24-25
102-47	List of material topics	Our sustainable strategy > Creating sustainable shared value: our impact areas The format of this first report is based on the materiality matrix in the Dutch report (Corporate Social Responsibility, Athlon Nederland 2020).	22-23
102-48	Restatements of information	Not applicable (first report)	
102-49	Changes in reporting	Not applicable (first report)	
102-50	Reporting period	2021	
102-51	Date of most recent report	22nd April 2022	
102-52	Reporting cycle	Every year	
102-53	Contact point for questions regarding the report	Alexander Heijkamp, Sustainability and Corporate Social Responsibility (CSR) Director, alexander.heijkamp@athlon.com	
102-54	Claims of reporting in accordance with the GRI Standards	This report has been inspired by the GRI Standards	
102-55	GRI content index	Current table	56-59
102-56	External assurance	Not applicable (first report inspired by GRI)	

GRI G	RI Description	Disclosure	Page
Social			
Diversity and	d equal opportunity 2016		
103-1 - 103-3	Management approach	Our impact areas > Diversity, equity and inclusion > Our contribution	46
Own indicator	Diversity, equity and inclusion (DEI) networks	Our impact areas > Diversity, equity and inclusion	46-47
Own indicator	Ratiofemales/total employees	Our impact areas > Diversity, equity and inclusion	46-47
Own indicator	Ratio female leaders/total employee:	Our impact areas > Diversity, equity and inclusion	46-47
Own indicator	Young leaders (< 40 y)	Our impact areas > Diversity, equity and inclusion	46-47
Own indicator	Average age Athlon employees	Our impact areas > Diversity, equity and inclusion	46-47
Own indicator	Number of internships	Our impact areas > Diversity, equity and inclusion	46-47
Local commi	unities 2016		
103-1 - 103-3	Management approach	Our impact areas > Community engagement > Our contribution	38
Own indicator	Voluntary work by Athlon employees	Our impact areas > Community engagement	40
Own indicator	Members participation in voluntary p gram	ro- Our impact areas > Community engagement	40
Customer an	nd consumer health and safety 2016		
103-1 - 103-3	Management approach	Our impact areas > Road safety > Our contribution	35
Own indicator	Athlon markets providing road safety solutions	Our impact areas > Road safety	35-36
Own indicator	Accidents caused by an Athlon vehic	le Our impact areas > Road safety	35-36

#### Annexes

#### Annexe 1: Declaration on the Principles of Sustainability and Corporate Social Responsibility

This declaration contains the following topics: Who we are as an organization, what we stand for and our commitment to our customers and society.

#### Our Sustainability and Corporate Social Responsibility (CSR) Mission Statement

"We shape sustainable mobility. We change the game in mobility with radical solutions by electrifying mobility and change travel behavior".

#### Sustainability

As Athlon Car Lease International B.V. we are aware of the impact we have on the climate, road safety and society as a whole. A big fleet automatically results in a higher CO<sub>2</sub> emission and a bigger risk to (road) safety. Hence, we focus on providing and giving advice on sustainable mobility. For example by:

- Actively sharing knowledge on the topic of full electric and plug-in hybrid vehicles.
- Introducing new forms of mobility.
- Preventing climate pollution.
- Promoting safe driving.

We practice what we preach by constantly looking for ways to become more sustainable. We invest in tools and environmentally friendly behavior of our employees, customers, lease car drivers, partners and suppliers.

#### Corporate Social Responsibility

We recognize the importance of social responsibility and we are dedicated to ensure the interest of our customers, employees, shareholders and society through practical examples on Corporate Social Responsibility (CSR).

We subscribe to the principles of CSR. We commit to:

- Accountability: Be accountable for our impacts on society, the economy and the environment;
- Transparency: Be transparent in our decisions and activities that have impact on society and environment;
- Ethical behavior: Engage in ethically correct behavior at all times;
- Respect for stakeholder interest: Respect, consider and respond to the interest of our stakeholders;
- Respect the rule of law: Accept that respect for the rule of law is mandatory;
- Respect for international norms of behavior: Respect international norms of behavior, while adhering to the principle of respect for the rule of law;
- Respect for human rights: Respect human rights and recognize both their importance and their universality.

#### Our Commitment

We commit to tackle our material Sustainability and CSR matters and will establish clear objectives and targets. Additionally, we develop and maintain social responsibility programs and management systems and dedicate sufficient resources to respond to these principles. Management and employees are expected to contribute to this policy.

We also subscribe to the principles of the Athlon Sustainability and Corporate Social Responsibility strategy. Therefore we commit to the following themes:

- Climate Action: Lowering our own carbon footprint every year and help our customers lower their carbon footprint by helping them to change mobility towards full electric mobility.
- Road Safety: By sharing our knowledge and practical solutions we aim to lower the number of road accidents.

- Community Engagement: We aim to create social impact, because our social responsibility goes further than cars and mobility.
- Vitality: Happy employees create happy customers and vice versa. That is why we want to increase the vitality of our employees. This includes the vitality of both body and mind.
- Diversity and Inclusion: We appreciate and foster diversity among our employees and we capitalize on the different experiences, skills and perspectives they bring in.

#### **Quality & Customer Focus**

We realize this through:

- Asking our customers what their needs and wishes are.
- Exceeding the expectations of our customers with high quality products and services provided by caring employees.
- Measuring, analyzing and maintaining the satisfaction of our customers, other stakeholders and our internal processes.
- Using our findings to introduce structural improvements and evaluating them.

#### **Meeting Demands**

Of course we would like to meet the demand of our customers, suppliers, government and Daimler AG. Being compliant is always our priority number one. This will be monitored through a sound system of controlling, audits and reporting. We expect our employees to play an active role in meeting these demands and implementing improvements in order to meet demands of the future.

#### Together

At Athlon we work together and we are highly motivated and passionate to reach our goals while developing the organization to become better. We work together to develop our organization and ourselves as a person. This is how we speed up our sustainability movement.

Our Contribution to the Sustainable Development Goals of the UN I Paris Climate Agreement We linked our Sustainability and CSR strategy to the SDGs: A common language which helps us, along with our stakeholders, to contribute to a better and more sustainable world. This also allows us to gain insight into how we can have an even greater impact. The SDGs should be taken as an indivisible whole. All are of equal importance. We focus on the SDGs where Athlon can have the most direct impact:

- → SDG11: Sustainable Cities and Communities
- → SDG12: Responsible Consumption and Production
- → SDG13: Climate Action
- → SDG17: Partnerships for the Goals









Through our areas of impact 3 (Community Engagement), 4 (Vital people) and 5 (Diversity and Inclusion), we also have an indirect impact on:

- → SDG3: Good Health and Well-Being
- → SDG4: Quality Education
- → SDG5: Gender Equality
- → SDG8: Decent Work and Economic Growth









Athlon Car Lease International B.V. Schiphol, January 2022

Signed by: Christian Schüler christian.schueler@athlon.com EMail: Signing time: 18-01-2022 16:15:17 IP address: 84.106.42.124

Christian Schüler

CEO

Athlon Car Lease International B.V. Schiphol, January 2022

Signed by: Alexander Heijkamp Signing time: 18-01 2022 08:53:00 IP address: 83.83.45.173

Alexander Heijkamp MBA Sustainability and CSR Director





Sustainability and CSR Report 2021

#### **Annexe 2: Athlon International Code of Conduct**

#### Company Profile

Athlon is a provider of vehicle leasing and fleet management. We have developed mobility solutions for over 100 years. We supply vehicle leasing and mobility solutions to meet the continuously changing needs of our customers.

#### Why and for Whom?

This code is intended to increase awareness of management and employees on fair business practices. This is done by documenting what is being considered as appropriate and inappropriate behavior. This code applies to every employee, director or officer in our company. Contract staff working for our company must also follow the code. Contractors and consultants who are agents of, or working on behalf of, or in the name of our company, are required to act consistently with the code when acting on our behalf.

#### Compliance with Law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws and regulations. We expect our employees to be ethical and responsible at all times.

#### Anti-Bribery and Corruption

We build relationships based on trust, and we are determined to maintain and enhance our reputation. For this reason, we never accept or pay bribes, including facilitation payments.

#### Gifts and Hospitality

We may not encourage, ask for or demand gifts and hospitality from business partners, or offering to them, especially those you would not be comfortable telling your manager, colleagues, family or the public that you had offered or accepted. In particular, we should avoid to allow gifts and hospitality, either offered or received, to influence our business decisions or give other people a reason to suspect there might be an influence.

#### **Conflicts of Interest**

Conflicts of interest may arise when personal relationships, participation in external activities or an interest in another venture, could influence or be perceived by others to influence our employee business decisions. A case of conflict of interest might jeopardize our company and employees' reputation. We must avoid actual, potential or perceived conflicts of interest if possible.

#### Fair Competition and Antitrust

Antitrust laws protect free enterprise and fair competition. Supporting these principles is important to us, and we expect our employees to play their part in combating illegal practices. These include price-fixing, market sharing, output limitation or bid-rigging, and anti-competitive or monopoly practices. We do not, for example, enter into any kind of inappropriate conversation or agreement with our competitors. We comply with all aspects of the Antitrust laws.

The Athlon International Code of Conduct is based on the Daimler Integrity Code and Daimler Sustainability Standards, which are applicable for Athlon Group.

Athlon Car Lease International B.V. Schiphol, January 2022

Signed by: Christian Schüler
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Signing time: 18-01-2022 16:15:17
IP address: 84.106.42.124

Christian Schüler CEO Athlon Car Lease International B.V. Schiphol, January 2022

Signed by: Alexander Heijkamp | EMail: alexander Heijkamp athlon.com | Signing time: 18-01\(\frac{1402408:53:00}{2408:53:00}\) | P address: 83.83.45.173

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