



# We help to change the way you *move*

2024 | Non-Financial Performance Statement



# Contents

INTRODUCTION TO EMG\*

**Our value creation model**

3

**Our value chain**

5

**"Commit Together": our CSR program**

6

SUSTAINABILITY STATEMENT

**Preamble**

10

**General disclosures**

11

General basis for preparation of  
the sustainability statement

12

Sustainability governance

13

Interests and views of stakeholders

14

Double materiality assessment

17

**Environmental information**

26

Climate change and pollution

27

Water

36

Resource use

38

Circular economy

39

**Social information**

40

Own workforce

41

Workers in the value chain

48

Consumers and end users

52

**Governance information**

57

Business ethics and data protection

58

Relationships with franchisees and suppliers

60

**Methodological Note**

62

**APPENDIX - Independent third-party report**

64



\*EMG: stands for EUROPCAR MOBILITY GROUP



# Our value creation model

We help  
to change  
the way you  
*move*

More than ever, we are committed to **delivering simple, seamless, innovative solutions that make mobility easier, enjoyable and increasingly eco-friendly.**

## In a challenging and rapidly transforming market, we are well positioned to play a leading role

- 1 Societal trends open up opportunities and make the usage model - as opposed to car ownership - a smart choice**
  - Sustainability, urgent need to reduce CO<sub>2</sub> emissions associated with transport/mobility
  - Inflation, increasing car ownership costs
  - New urbanization schemes, leading to restrictions of access to downtowns
- 2 We are a mobility service company**
  - 75-year expertise of service - B2C and B2B
  - One of Europe's leading car rental companies with a global presence
  - Operating over a broad range in the mobility value chain: from vehicle maintenance and repair to customer services
- 3 With our offering, we can be part of the solution towards a low-carbon world and leverage growth opportunities**
  - Car sharing: for a few hours
  - Car rental: for a few days
  - Car subscription: for a few months

## We are relying on strong assets

- #1 A dense and global network**


The Group is present worldwide through a network of around **130 countries**, among which 16 countries with corporate stations (Europe, United States, Australia and New-Zealand) and other countries through franchisees and partners.

- #2 Four distinctive brands, responding to differentiated needs, use cases and expectations in terms of level of service:**

**Europcar**

A European leader of car rental and light commercial vehicle rental (traditional and upscale market)

**GOLDCAR**

A low cost leader in Europe

**fox**  
rent a car

A dynamic low cost offer in the United States

**EURO MOBIL**  
RENT-A-CAR

A German actor of car rental, leveraging the VW brand dealerships

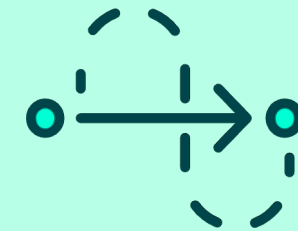
\*In October 2023, EMG took a controlling stake of 51% in Euromobil GMBH. As a consequence of the control held by the Group over Euromobil, the entity was fully consolidated in the Group consolidated financial statement starting November 2023.

### #3 A modern fleet, equipped with the latest engines



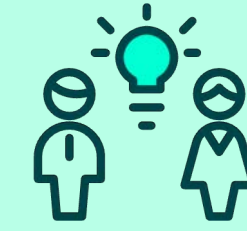
Total fleet on average in 2024:  
**over 287,000**

### #4 Mainly distributed via directly owned channels



Number of stations (corporate and franchisees):  
**over 2,700**  
Number of digital platforms:  
**more than 140**

### #5 A mix of talents to operate a daily service



**64 %** stations,  
**36%** support functions

### #6 A "One Group" culture, strengthened by our values

We act  
with respect



We embrace  
change



We move  
as one



We are happy  
to help



We take  
responsibility



## ...to create value for all our stakeholders

#### Customers

- Rental days: **over 77 million**
- NPS (Net Promoter Score) for the Europcar brand: **58,1**

#### Employees

- Total number of headcounts: **over 9,300**
- % women / men: **42 % women**  
**58 % men**
- Seasonal workers: **over 5,200**

#### Suppliers

- Number of Fleet suppliers: **more than 300**
- Number of Non-Fleet suppliers: **around 20,000**

#### Shareholders

As of 31/12/2024

- % GMH\*: **99, 83 %**
- % EMG: **0,17%**

#### Planet

Carbon footprint:

- Excluding US and Euromobil (perimeter of our initial SBTi commitment):  
**1,979,411 Teq CO2**
- Including US: **2,733,003 Teq CO2**
- Including Euromobil: **2,782,809 Teq CO2**

% of EVs and PHEVs (emitting less than 50 g CO2 / km) in fleet:

- Scope of our Sustainability-Linked Bond\*\*\*: **11%**
- Europcar Mobility Group corporate countries scope: **10%**
- Including Euromobil: **10%**

ISO 14001 countries: **5**

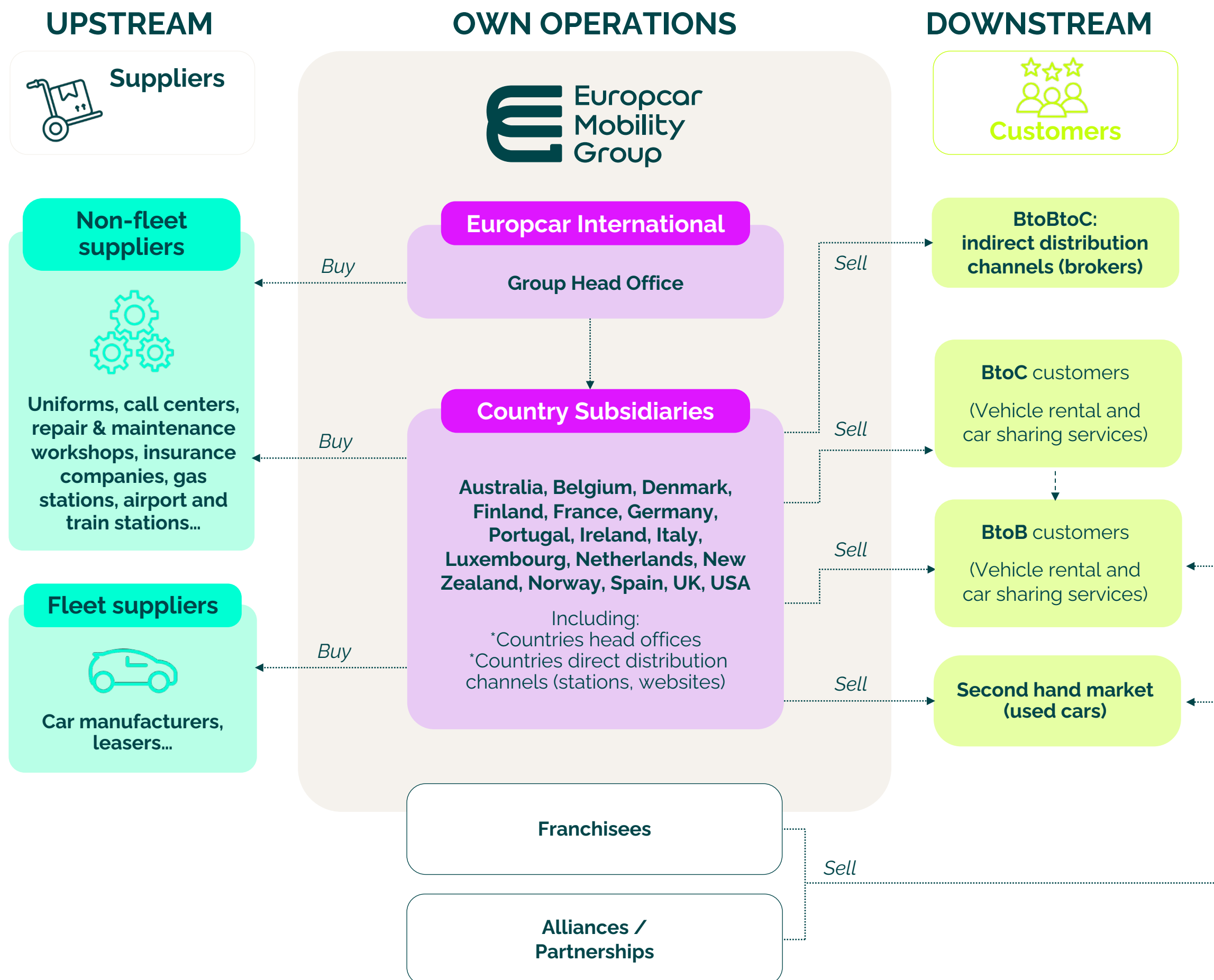
Contribution to UN Sustainable Development Goals: **9**

\*\*GMH (Green Mobility Holding): a consortium comprising Volkswagen AG, Pon Holding BV and Attestor

\*\*\*% of green vehicles on the perimeter of commitment defined in the framework of the Group's Sustainability-Linked Bond (Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Luxembourg, Norway, Portugal, Spain, the UK)..



# Our value chain



Upstream, Europcar Mobility Group's value chain encompasses:

- **Fleet suppliers:** car manufacturers with whom EMG negotiate agreements to source vehicles on a buy-back or an "at risk" model, or third parties for the "on lease" model.
- **Non-fleet suppliers:** providers for station building and maintenance, car park operators, gas stations, uniforms providers, car wash stations, repair and maintenance workshops, IT support services, call center services, consultancies, creative and media agencies, insurance companies ... all services that are required to operate a daily rental service to millions of customers each year, as well as every process and expertise required to develop our brands and reach our customers.

In addition to its own operations, EMG's value chain also considers the franchisees and alliance partners.

**The franchisees and alliance partners** allow the Group to expand its global footprint, without having to operate directly in some countries where a local background and experience is the most relevant strategic option.

**Customers and end users** are of course key in the value chain, downstream: their safety and their satisfaction are at the roots of the performance of the Group, and the Group has the ambition to serve as many customers as possible with the same high

standards of quality and safety everywhere it operates, with its own subsidiaries as well as with its franchisees and alliance partners network.

Lastly, EMG's downstream value chain also encompasses secondary distribution channels and markets:

- Brokers, which are considered as an indirect distribution channel for EMG's rental services: our Group works with them on a commission model to reach BtoC customers looking for value for money through their price comparison platforms.
- Used vehicle professionals, who buy from rental companies to meet their customers' demand.

In a nutshell, EMG's value chain is a complex ecosystem including a great variety of business actors, designed to deliver seamless mobility services to millions of customers.



# "Commit Together": our CSR program

At Europcar Mobility Group, we are convinced that we can play an active and leading role in the transition towards a low carbon mobility: offering simple, seamless, innovative solutions as well as "greener" vehicles to meet customers' personal and professional transportation needs, in a responsible and sustainable manner. This conviction is fully embedded in the Group's purpose, **"We help to change the way you move"**, which notably derives from the Group's **long-standing commitment to sustainable development and corporate social responsibility**.

**In 2005**, the Group was the first player in the vehicle rental sector to adhere to the principles of the United Nations Global Compact. Every year since then, the Group has reaffirmed its commitment to adhere to all 10 principles – based on the Universal Declaration of Human Rights, the ILO Declaration, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption – and to contribute to the achievement of 9 out of the 17 United Nations Sustainable Development Goals (SDG).

**In 2017**, our Group initiated a structured Corporate Social Responsibility approach - the "Commit Together" program -, in order to embark on a process of continuous improvement in key areas of sustainability and share its commitments with its employees and partners.

This program, which was approved by the Group's governance bodies, followed the consultation of its main stakeholders (employees, suppliers, customers, investors and franchisees) as well as an analysis of the related impacts, risks and opportunities.

**In 2019**, this programme has been accelerated by the Group's environmental agenda: with the launch of the "One Sustainable Fleet" program, EMG joining the Science Based Targets initiative and the launch of the Group's carbon reduction plan. Europcar Mobility Group is the first vehicle rental player to have its 2030 carbon reduction targets approved by SBTi.

**"Commit Together"** comprises 4 pillars  
& 17 commitments:







### Convictions

We are convinced that mobility is an essential need for individuals and societies.

Historically, our Group has always strived to make people's mobility affordable and accessible. When it started its activity in 1949, it was all about allowing mobility to people who cannot afford to buy a car – simply because at that time cars were not affordable to all.

Today, Europcar Mobility Group offers a range of products and services that is sufficiently diverse to cover all customer needs and budget, including dedicated offers for people having difficulties to access mobility solutions. Through our products and services, we also aim at building confidence and trust with our customers, by applying the highest safety standards and targeting a high level of customer satisfaction.

In parallel, our Group is developing solidarity initiatives alongside associations and NGOs in the countries where we operate.

### Commitments

- Ensure the accessibility of our offers and services
- Propose a service that complies with the highest safety standards
- Target a high level of customer satisfaction
- Develop solidarity initiatives



### Convictions

As a mobility service company, Europcar Mobility Group is a company "by people for people". We believe that our performance is closely linked to the diversity and commitment of our employees, who live our values every day. These beliefs are the foundations on which the Group's responsibility as an employer is built and on which it focuses its efforts, while ensuring that any major societal changes affecting the workplace are incorporated as and when they occur.

### Commitments

- Implement a dynamic Human Resource Management
- Develop a social policy fostering dialog
- Make diversity a driver of the Group's performance
- Attract talents, develop them and support employees career paths
- Measure and develop employee engagement



### Convictions

By the very nature of its business, our Group is part of the global carbon emissions and air pollution problems. But it can also be part of the solution. At Europcar Mobility Group, we believe that shared mobility is an essential part of the solution the world needs. Indeed, vehicle rental is all about sharing an asset with several people, which in the end contributes to decreasing the number of cars on the roads and in the streets.

Today, the Group wants to lead the change towards more sustainable and shared mobility, in line with its purpose: "We help to change the way you move". It means offering more and more attractive alternatives to vehicle ownership, be it for one hour, one day, one week or more, with the expansion of our car rental, car sharing and car subscription services. But it also means reducing the Group's carbon footprint: in particular by making strong commitments on Scope 3, making EVs accessible to thousands of private and business customers.

### Commitments

- Commit towards carbon reduction (SBTi)
- Measure our carbon footprint
- Roll out a comprehensive carbon reduction plan
- Manage our resources in a responsible manner



### Convictions

We take pride in our values and constantly strive to adhere to our business ethics, which is a key factor for enhancing our customers' trust and loyalty and that of our partners.

The Group wishes to further involve its stakeholders, both internal and external, through the commitments made in its Code of Ethics and by increasingly integrating CSR into its supplier relationships.

### Commitments

- Source responsibly
- Exercise a duty of care
- Combat corruption
- Promote ethics



# "Commit Together" contributes to the following United Nations Sustainable Development Goals (SDGs)

Commit Together	UN SDG									
Pillars	Streams									
MAKE MOBILITY ACCESSIBLE	Ensure the accessibility of our offers and services					✓	✓	✓		
	Propose a service that complies with the highest safety standards					✓				✓
	Target a high level of customer satisfaction				✓					
	Develop solidarity initiatives					✓				
BE A RESPONSIBLE EMPLOYER	Implement a dynamic human resources management		✓		✓					
	Develop a social policy fostering dialog		✓		✓					
	Make diversity a driver of the Group's performance		✓		✓					
	Attract talents, develop them and support employees' career path	✓			✓					
	Measure and develop employee engagement				✓					
ACT FOR THE ENVIRONMENT	Commit towards carbon reduction (SBTi)							✓		
	Measure the Group's carbon footprint						✓	✓		
	Roll out a comprehensive carbon reduction plan						✓	✓		✓
	Manage our resources in a responsible manner			✓			✓		✓	
SHARE OUR BUSINESS ETHICS	Source responsibly							✓		
	Exercise a duty of care				✓					
	Combat corruption				✓					
	Promote ethics				✓					



Every year, since 2005, EMG publishes its Communication On Progress (COP). In 2022, EMG reached the “Advanced” Level, which is the highest level of reporting according to UN Global Compact standards and demonstrates the adoption by the company of a range of good practices in line with the Global Compact principles.



# "Commit Together" 2024 Key Performance Indicators

For comparison with last year's results, all figures exclude Euromobil.

		2023 results	2024 results
ENVIRONMENT	Greenhouse gas emissions. Include scope 1, 2 and 3 and the methodology follows the GHG Protocol	2,406,315 tCO2e*	1,979,411 tCO2e*
	Average emissions of CO2 e/km from vehicles	135 gCO2/km**	130 gCO2/km**
	Number of country subsidiaries having a ISO 14001 certification	5	5
	Proportion of plug-in hybrid and electric vehicles in the fleet	12%** 10.7%***	11%** 10%***
	Number of kilometers covered by plug-in hybrid and electric vehicles in the fleet	684 million km	574 million km
	Proportion of vehicles washed without water nor movement Among stations participating to the "Quick Turnaround" program	13%	10.2%
SOCIAL	Frequency rate of work-related accidents	14.29	14.9
	Total workforce and breakdown of employees according to gender	<b>Total Workforce:</b> 8,804 <b>Female:</b> 3,692 <b>Male:</b> 5,112	<b>Total Workforce:</b> 8,924 <b>Female:</b> 3,713 <b>Male:</b> 5,211
	Hires and Departures	Hires: 2,712**** Departures: 2,812	Hires: 2,884**** Departures: 2,959
	Total of wages and bonuses	€416.2m	€439.2m
	Proportion of employees who have received training during the year	94%	89%
	Proportion of employees covered by collective agreements	67%	73%
	Proportion of medium or high risk non-fleet suppliers (i.e. critical) that have been evaluated on their CSR performance	7.2%*****	13.3%*****
	Net Promoter Score (NPS). The Net Promoter Score for the Europcar brand is monitored historically as a key performance indicator	58.3	58.1

\*Excluding US and Euromobil (perimeter of our initial SBTi commitment)  
\*\*On the perimeter of commitment defined in the framework of the Group's Sustainability-Linked Bond (Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Luxembourg, Norway, Portugal, Spain, UK)  
For more details on average emissions per kilometers for cars and vans, see p.33  
\*\*\*% of green vehicles in the Group's total fleet, all corporate countries  
\*\*\*\*The total hires figure do not include the number of employees that have changed status, from seasonal/casual workers to employees (permanent or non-permanent)  
\*\*\*\*\*Third parties assessment tool / CSR module launched end of 2022, still under deployment

Note - A performance indicator covering business ethics will be developed in 2025.



# Preamble

As the Group is **still subject to "DPEF" (Déclaration de Performance Extra-Financière, or French Declaration of Extra-Financial Performance)**, this document contains all requirements of the non-financial performance statement, in compliance with the transposition into French law of the European Directive of October 22, 2014, related to the disclosure of non-financial information (NFRD).

In preparation for the European Union Directive 2022/2464 of December 14, 2022 related to corporate sustainability reporting (**the "Corporate Sustainability Reporting Directive" or "CSRD"**) and Delegated Regulation (EU) 2023/2772 of July 31, 2023 (ESRS), Europcar Mobility Group has made proactive efforts to increase its level of readiness to CSRD by carrying out its double materiality assessment as early as 2024 and reporting in the present document on the material sustainability matters identified via this assessment. All through 2024, the Group has also worked to increase its level of readiness to the Taxonomy reporting requirements.

## Note

- The double materiality assessment published in this document will be audited by an independent auditor when Europcar Mobility Group will be effectively subject to CSRD, depending on the timetable for implementing the directive, which may be revised in the context of the Omnibus regulation.
- As far as Taxonomy is concerned, the Group intends to publish its first Taxonomy note when it will be effectively subject to Taxonomy, depending on the timetable of application, which may be revised in the context of the Omnibus regulation.

In the coming years, the Europcar Mobility Group intends to focus its "Commit Together" programme on the priorities identified via its double materiality assessment, structuring its CSR commitments around 3 streams (Environment, Social, Governance), reinforcing its existing practices via policies and actions and progressively establishing targets on each of its sustainability matters, so as to foster continuous improvement.

This approach underscores Europcar Mobility Group's dedication to maintaining and constantly updating its long-standing commitment to sustainable development and corporate social responsibility.





## 1

# GENERAL DISCLOSURES

- 1.1 General basis for preparation of the sustainability statement
- 1.2 Sustainability Governance
- 1.3 Interests and views of stakeholders
- 1.4 Double materiality assessment



## 1.1 General basis for preparation of the sustainability statement

The Group Sustainability Statement is based on a double materiality approach, which considers both the **impacts** of Europcar Mobility Group on the environment and society, and the influence of environmental and social issues on the company's performance, translating into **risks** and **opportunities** related to sustainability that the Group is facing.

### 1.1.1 Scope of the sustainability statement

The information presented in the Sustainability Statement covers Europcar Mobility Group's consolidated scope, covering all the shared services and support functions, as well as the countries where the Group operates with fully owned subsidiaries:

- Group HQ (located in France), Shared Services Center (located in Portugal), Product and Tech function (located in France and in Spain),
- Australia, Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Luxembourg, New Zealand, Norway, Portugal, Spain, United Kingdom, United States.

In October 2023, Europcar Mobility Group took a controlling stake of 51% in Euromobil GmbH. In that perspective, the Sustainability Statement also

covers the Euromobil activity ; the scope of consolidation being aligned with the Group's financial reporting scope.

The sustainability statement covers the Group's upstream and downstream value chain in relation with sustainability matters which have been identified as material.

Detailed scoping rules per indicator are specified in the description of each indicator or in footnotes where applicable.

### 1.1.2 Reporting period and reference year

Most environmental, social, societal and governance data are reported as at December 31 of the reporting year ended, for one calendar year.

#### Reference year for carbon footprint / carbon reduction

In the framework of the "Commit Together" program, the Group's carbon reduction plan sets 2019 as its reference year for measuring progress against carbon related objectives. This baseline year was chosen because it corresponds to the year in which Europcar Mobility Group joined the Science Based Target initiative to define its carbon reduction targets for 2030.

For the carbon footprint, we have a three-way presentation:

- We have chosen to keep the calculation of the evolution of our carbon footprint isoperimetric (2019 perimeter, excluding the United States) in order to ensure that we can track the progress made by the Group's historical countries.
- In parallel, we publish our total carbon footprint including the US (nb - the Group acquired Fox Rent a Car in the US at the end of 2019). It reflects the current full perimeter of the Group (corporate countries).
- This year, for the first time, we are also publishing our total carbon footprint including Euromobil.

#### Reference year for fleet "greenification"

In September 2021 the Group launched a €500 million Sustainability-Linked Bond to refinance its fleet on the basis of "green" criteria. The objective of this bond issuance was to proactively manage fleet-related debt and introduce an incentive for fleet "greenification".

This specific framework sets 2021 as its reference year and the end of 2024 as the date for achieving its sustainable performance targets.

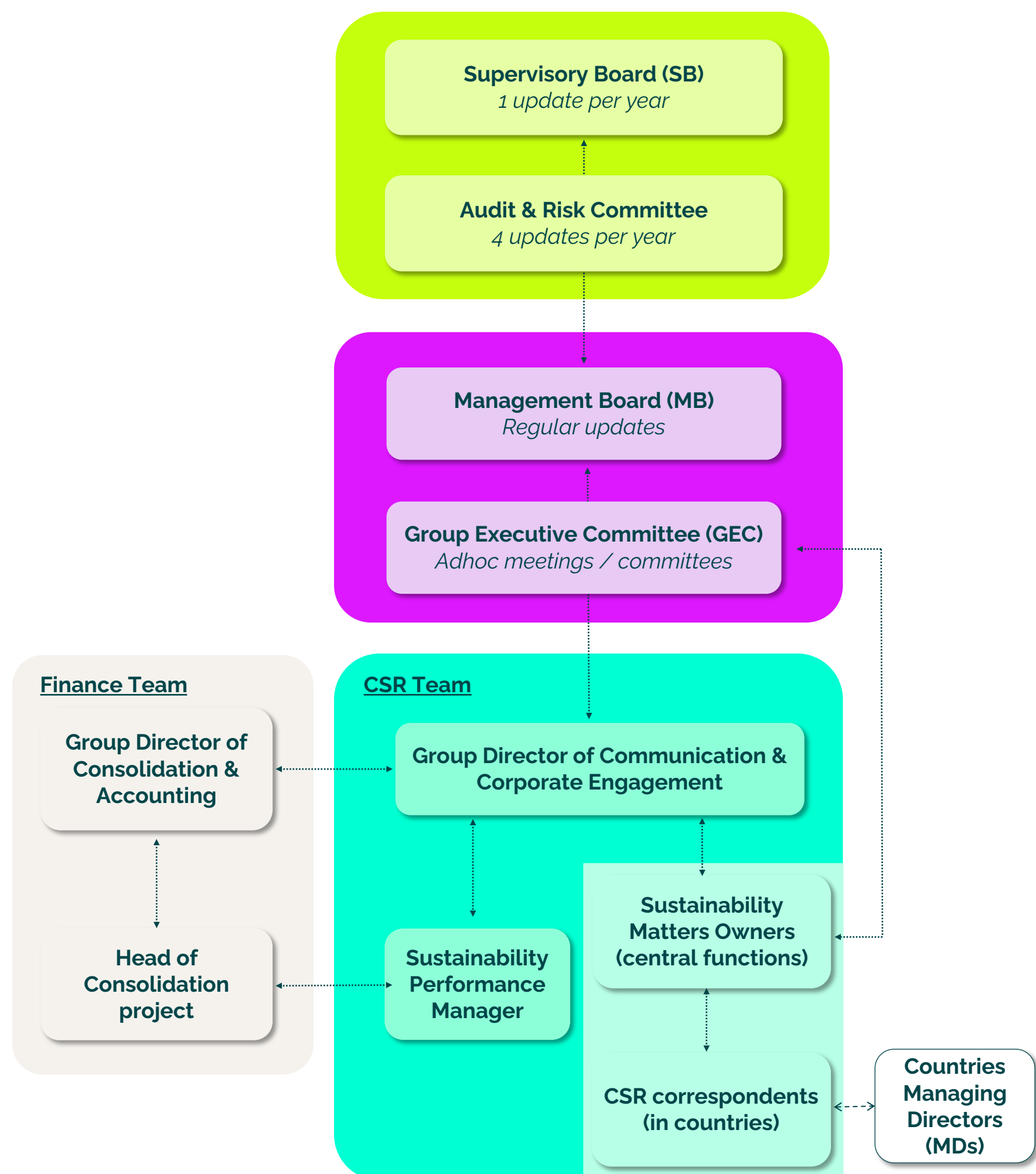
The perimeter of the Sustainability-Linked Bond was set for the following countries:

Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Luxembourg, Norway, Portugal, Spain and the UK.





## 1.2 Sustainability Governance



The sustainability governance involves several key bodies:

- The **Supervisory Board** receives annual updates on non-financial performance, identifying areas for improvement, while the **Audit and Risk Committee** oversees compliance with reporting requirements.
- The **Management Board** integrates sustainability into decision-making and approves CSR initiatives.
  - The Group CEO supervises the CSR program, with the Director of Communication and Corporate Engagement reporting to him.
  - The Group CFO is the sponsor of the company's preparation to the CSRD and Taxonomy reporting requirements.
- Following double materiality assessment, material sustainability matters have been assigned to specific **GEC members** to ensure proper resources and action plans.
- The central **CSR team** coordinates efforts, develops guidelines, and manages reporting in collaboration with the **Finance team**.
- **Sustainability Matters Owners** oversee implementation, integrating sustainability into policies, action plans and KPIs.
- **CSR correspondents** at the local level collect data, share best practices, make sure that CSR initiatives and action plans are compliant with local regulations.

### Internal controls

The Group internal control system enforced by the Group Risk, Audit and Internal controls team covers all the Group's activities including sustainability. Europcar Mobility Group's internal controls are regularly reviewed and updated to reflect the evolutions of the Group's CSR priorities, as well as the changes in the regulatory environment.

In the framework of the Group's risk map, **existing controls related to the "CSR risk" are focused on four areas:**

- Integration of changes in the regulatory environment, major societal trends and climate change consequences.

- Continuous improvement of non-financial reporting.
- Assessment of our value chain on ESG criteria.
- Strengthening of sustainability governance.

Additionally, Europcar Mobility Group has set up **structured controls with regard to sustainability reporting**, in order to ensure consistency, reliability and quality of non-financial data.

The reporting protocol defines the methodology for calculating the non-financial indicators of the Group. This reporting protocol:

- provides consistent guidance and rules for all Group entities / functions / teams involved in the reporting, in terms of organization and indicator definitions,
- ensures the continuity of the reporting process and the reported information in case of changes in the reporting teams and the auditability by the independent third party,
- defines the internal control steps required before the final submission of data, both at country and group levels.

Annually, the Group's CSR team keeps the sustainability reporting scope up to date, reflecting the Group's portfolio evolutions.

### Audit

In compliance with the applicable regulation on the disclosure of sustainability information, the data and KPIs of the Group's non-financial performance statement are audited by an independent third-party verifier (see section "Independent third-party's report"). The indicators are audited with a limited level of assurance. Each year, the audit is rolled out in 2 phases:

- At the end of Q3 > 9-month data and KPIs audited in 3 countries, selected on the basis of their size in order to represent at least 20% of the perimeter of activities of the Group.
- In Q1 of the year of publication > Full year data and KPIs audited for the full perimeter of the Group.



1.3

Interests and  
views of stakeholders

Europcar Mobility Group regularly engages with stakeholders from the entire value chain to incorporate their interests and their views in its sustainability efforts. The dialogue with the stakeholders takes various formats such as interviews, satisfaction surveys, meetings.

Stakeholders points of views have thus fueled the double materiality assessment carried out in 2024 (and particularly the impact materiality).

The Group's dialogue with its stakeholders is described in the table below.

	Who they are	Types of dialogue	Their main interests and expectations
Workforce	Employees, employee representatives	<ul style="list-style-type: none"><li>Opinion survey ("Speak Up!" opinion survey)</li><li>Workers council meetings (Group level, countries level)</li><li>Team meetings</li><li>Internal communication (various channels to favour top-down / bottom-up communication: internal social network, newsletter, events with Q&amp;A sessions)</li></ul>	<ul style="list-style-type: none"><li>Clarification of the strategy and long-term objectives of the company + visibility on how can employees can contribute to it</li><li>Information on results / performance of the company over the long-run (topics which have a direct impact on employment stability and employee well-being at work)</li><li>Work organisation (working hours, working conditions)</li><li>Health &amp; safety considerations</li><li>Continuous improvement / modernization of tools, simplification of processes</li><li>New offers in order to better serve customers / innovation</li><li>Adequate wages</li><li>Respect: individual respect, contributions valued, respect of diversity</li><li>Compliance to European and local regulations / business ethics</li><li>Data protection / data privacy</li></ul>
Customers BtoC	Individuals, families	<ul style="list-style-type: none"><li>Customer satisfaction survey (NPS)</li><li>Mystery shopping</li><li>"Customer Experience Days" including field immersion, customer listening sessions, round tables with customers...</li><li>Ad hoc focus groups with customers</li><li>Customer Care department dealing with customer assistance and customer complaints</li></ul>	<ul style="list-style-type: none"><li>Convenience and ease of use: Customers want a seamless and hassle-free booking and rental process</li><li>Vehicle availability and station accessibility</li><li>Value for money</li><li>Reliability and quality: Well-maintained and cleaned vehicles</li><li>Excellent customer service: Friendly and helpful staff, efficient assistance, and quick resolution of any issues</li><li>Safety and security: Safe and secure vehicles, along with insurance options to cover potential risks</li><li>Sustainability: Eco-friendly options, such as electric or hybrid vehicles, and sustainable practices</li><li>Reduced waiting times: quick pick up and return procedures</li><li>Flexibility: ability to easily modify and cancel a reservation</li><li>Transparency on additional costs: clear and detailed information about additional charges (fuel, insurance, etc.) at the time of booking, pick up and return</li><li>Digital experience</li><li>Compliance to European and local regulations / business ethics</li><li>Data protection / data privacy</li></ul>



	Who they are	Types of dialogue	Their main interests and expectations
Customers BtoB	<ul style="list-style-type: none"><li>Fleet directors in large companies</li><li>SMEs business owners</li><li>Business professionals</li><li>Self-employed professions</li></ul>	<ul style="list-style-type: none"><li>Customer satisfaction surveys towards decision makers and end users (NPS)</li><li>Ad hoc focus groups</li><li>Customer events</li></ul>	<ul style="list-style-type: none"><li>Convenient, flexible mobility solutions to enable business delivery and business travels</li><li>Facilitating company car policies as a partner (reducing costs and saving time)</li><li>EVs to help them meet their sustainability commitments</li><li>Easy access to invoices</li><li>Compliance to European and local regulations / business ethics</li><li>Data protection / data privacy</li></ul>
Suppliers (fleet)	<ul style="list-style-type: none"><li>Key contacts at car manufacturers, leasing companies: client directors, account / customer managers</li><li>Workers at suppliers</li></ul>	<ul style="list-style-type: none"><li>Permanent dialogue with car manufacturers</li></ul>	<ul style="list-style-type: none"><li>Car rental players being their secondary market, opportunity for fleet suppliers to promote new vehicle models (mainly car manufacturers) through them and generate used cars for their second hand networks (for "buy back" vehicles only)</li><li>Workers at suppliers:even though they have no direct contact with the Group, they expect the Group to be vigilant on how their employer manages its workforce.</li></ul>
Suppliers (non-fleet)	<ul style="list-style-type: none"><li>Key contacts at suppliers: client directors, account / customer managers, project managers</li><li>Workers at suppliers</li></ul>	<ul style="list-style-type: none"><li>Regular meetings around tenders and contracts</li></ul>	<ul style="list-style-type: none"><li>Good and long-term relationships, providing case histories/credentials on which to build and relying on reasonable payment delays</li><li>Workers: for certain categories/services supplied, workers at suppliers feel as if they were part of the Group and expect the Group to be vigilant on how their employer manages its workforce.</li></ul>
Franchisees & Partners (incl. brokers and OTAs)	<ul style="list-style-type: none"><li>CEOs / Commercial Directors at franchisees and partners</li><li>Workers at franchisees and partners</li></ul>	<ul style="list-style-type: none"><li>Regional and global meetings (franchisees)</li><li>Surveys</li><li>Field visits</li><li>Regular business meetings (partners)</li></ul>	<ul style="list-style-type: none"><li>Benefitting from additional flows of customers to grow their business, thanks to the brand image and the Group's global footprint</li><li>Support provided by the Group (eg – marketing, e-commerce...)</li><li>Workers at franchisees and partners: representing the Group's brands, expecting the Group to be vigilant on how their employer manages its workforce.</li></ul>



	Who they are	Types of dialogue	Their main interests and expectations
Financial partners	Banks, investors	<ul style="list-style-type: none"><li>Ad hoc meetings</li><li>Dialogue via « Investor Relations » mailbox</li><li>Publication of official documents (financial statement, non-financial statement, management report)</li></ul>	<ul style="list-style-type: none"><li>Financial performance, translating into return on investment</li><li>Non-financial performance: positive ESG ratings, proven commitment to sustainability</li><li>Compliance to European and local regulations / business ethics</li></ul>
Shareholders	Green Mobility Holding	<ul style="list-style-type: none"><li>Supervisory Board meetings</li><li>Annual General Meeting</li><li>Meet &amp; Greet with EMG employees</li></ul>	<ul style="list-style-type: none"><li>Compliance to European and local regulations / business ethics</li><li>Financial and non-financial performance</li><li>Value creation</li><li>Leadership, sense of ownership of the executive teams</li></ul>
Public authorities	Elected officials and administration, professional federations, regulatory bodies	<ul style="list-style-type: none"><li>One-to-one meetings with Group's Public Affairs Director</li><li>Joint conferences/events on sustainable mobility</li><li>Sharing of position papers</li><li>Memberships, Chairmanships (eg – Mobilians, Association des Acteurs de l'Autopartage, MAAS Alliance...)</li></ul>	<ul style="list-style-type: none"><li>Compliance to European and local regulations / business ethics</li><li>Data protection / data privacy</li><li>Positive contribution to the economic, environmental, social and societal impact</li></ul>
Associations, NGOs	Founders / managers / of associations, NGOs	<ul style="list-style-type: none"><li>One-to-one meetings with Group's Director of Communication and CSR</li><li>Exchanges via the Wenabi platform</li><li>Open days at Group's head office</li></ul>	<ul style="list-style-type: none"><li>Financial support / donations</li><li>Volunteers</li></ul>



## 1.4 Double materiality assessment

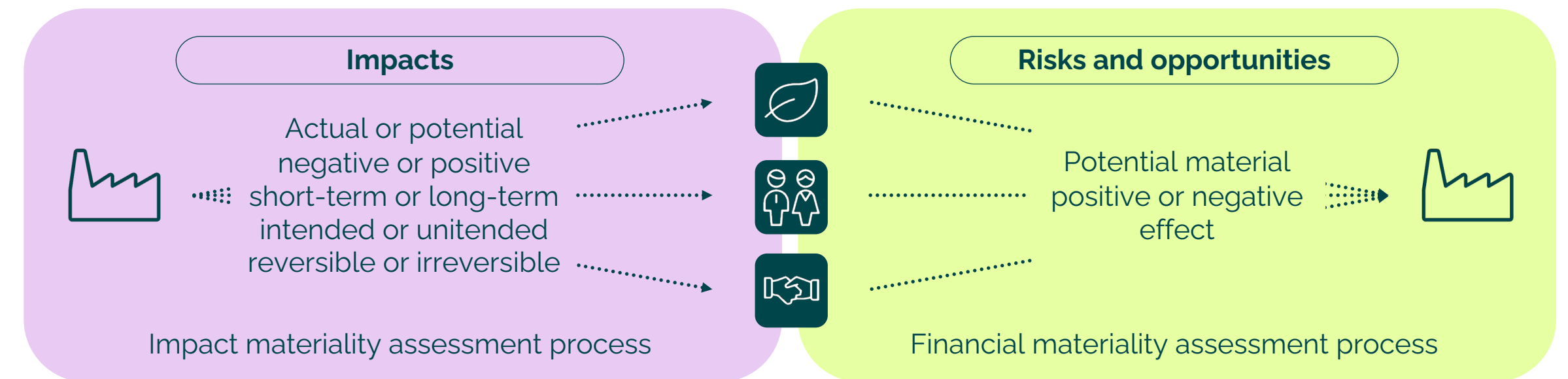
### 1.4.1 - Description of the process to identify and assess material impacts, risks and opportunities

In 2024, Europcar Mobility Group carried out its double materiality assessment. An external advisory firm supported the Group in this process to ensure the robustness of the methodology.

#### Methodology

The objective of this double materiality assessment was to assess the materiality of sustainability and ESG topics from 2 complementary perspectives:

- An "impact" perspective, i.e. the negative or positive impacts of the Company and its activities on the environment and the people it works with.
- A "financial" perspective, i.e. the risks and opportunities that environmental and social issues represent for the Company's activity.



More precisely, the assessment followed the methodology and assessment grids applied by the Group's Risk, Audit and Internal Control team for the Group's risk map:

- For the assessment of Impacts, we considered different dimensions:
  - Severity of the negative impact or Benefits of the positive impact
    - Scale
    - Scope
    - Irremediable character (for negative impacts only)
  - Likelihood
- For the assessment of Risks and Opportunities, we considered as well different dimensions:
  - Magnitude of potential financial effects
  - Likelihood

For both impacts and risks / opportunities, we have also considered the different time horizons over which they might occur (short, medium and long term).



The materiality assessment was conducted in **4 phases**:

## 1 - Contextual analysis

Europcar Mobility Group (EMG) conducted a contextual analysis using multiple sources, including all mandatory topics from the **ESRS (European Sustainability Reporting Standards)**. The analysis involved desk research based on the latest reports and studies related to sustainability in the mobility, transport, automotive, and travel & leisure sectors as well as the dependencies of these sectors (such as resource access and use).

The aim was to understand how sector trends, changes, and challenges translate into impacts, risks and opportunities (IROs) for EMG. The geographical focus on Central Europe and the company's exposure to global travel trends were also considered when selecting relevant studies.

In addition, EMG referred to international ESG frameworks such as the **Global Reporting Initiative (GRI)**, the **UN Global Compact**, and the **Sustainable Development Goals (SDGs)**. Feedback from **external sustainability assessments** (like those from CDP, EcoVadis, and Sustainalytics) was also taken into account.

At the end of this process, EMG's CSR team identified a list of potential sustainability matters and Impacts, Risks and Opportunities (IROs), to assess which ones were material for the Group.

## 2 - Assessment phase

On the basis of an initial list of sustainability matters and IROs, Europcar Mobility Group launched an assessment phase involving internal stakeholders.

- Participants in this double materiality assessment were selected based on their expertise in sustainable development, their position within the company, and their ability to manage sustainability issues and drive change in their respective areas. The selection process was carried out by GEC members, supported by initial workshops with key Functions managers.

Finally, face-to-face and in-depth interviews were conducted between January and March 2024.

## 3 - External consultation

Europcar Mobility Group conducted additional interviews with external stakeholders to complement the work of internal teams in identifying key sustainability issues. The goal was to gather external expertise to confirm the materiality level of these issues and assess the relevance of existing policies and action plans.

These external stakeholders were asked to give their opinions on the potential or actual impacts of EMG, its partners, and other players in its value chain, both upstream and downstream, on the environment and individuals.

The stakeholders were selected based on their expertise in sustainable development and their knowledge of sectors such as mobility, transport, travel and leisure, automotive, and vehicle rental.

The interviews involved a diverse group of stakeholders, including customers, professional federations, franchisees, public authorities, research institutes, car manufacturers, and financial partners.

## 4 - Validation phase

The outcomes of the interviews, including the final definition of impacts, risks, and opportunities (IROs) and their ratings, were shared with each participant in the assessment phase for review. After this initial review, dedicated meetings were held with the GEC members who were involved in selecting internal stakeholders. These GEC members were asked to approve or adjust the ratings proposed by their teams.

The Group's CSR team then consolidated the results to create proposed scenarios for the double materiality matrix. These scenarios were first presented to the Group CFO (sponsor of the CSRD preparation), and then to the Group Executive Committee for final decision and approval on April 9, 2024.

The GEC selected a scenario with a materiality threshold set at 12, on a scale from 1 to 25.

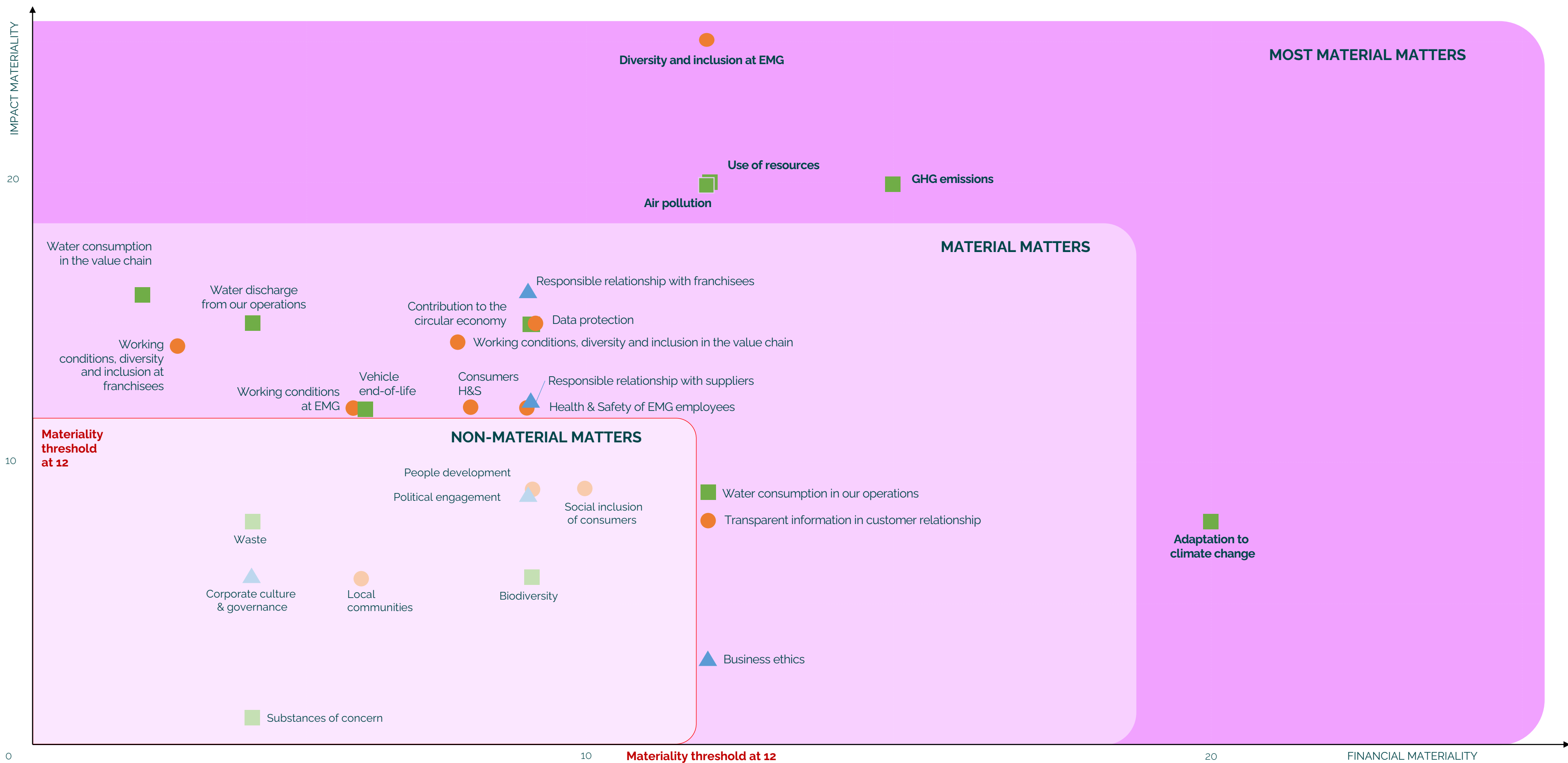
The final results, including the double materiality matrix, were shared with the Audit and Risk Committee on December 4, 2024.



## Results

Among the initial list of sustainability matters, 22 have been identified as material for Europcar Mobility Group, with regard to their importance from a financial perspective or from an impact perspective, or both. These 22 material sustainability matters are linked to 31 Impacts, Risks and Opportunities (19 impacts, 12 risks or opportunities).

The illustration below shows the sustainability matters currently considered to be the most important, as well as the topics which are not considered as material to date.



- "Most material matters" are rated between 18 and 25. "Material matters" are rated between 12 and 18. These matters are key areas for action.
- "Non material matters" are rated below the threshold that we determined at 12. Although these topics are currently identified as non-material, we will keep a close watch on them to see if, over time, changes in the environment require us to review our initial assessment.



## 1.4.2 Description of the material impacts, risks and opportunities for EMG

### Environmental topics

#### Most material environmental matters

##### Greenhouse gas emissions and air pollution caused by the use of vehicles in our fleet

Each year, EMG delivers millions of rental days, serving millions of customers with a large fleet, predominantly ICE (Internal Combustion Engines), although we are offering more and more electric vehicles. We are therefore indirectly responsible for tons of greenhouse gas emissions – linked to the use of our vehicles by our customers – thus ultimately contributing to climate change. That's the reason why EMG is strongly committed in terms of carbon reduction, being the first car rental player having its carbon reduction targets approved by the SBTi.

In the same context, our vehicles, when used by our customers, emit fine particles (mainly caused by tyre-road contact), which contributes to air pollution and thus to major public health problems and adverse effects on ecosystems.

In addition to these two negative impacts, our double materiality analysis highlighted the risk of additional costs linked to the electrification of the fleet and network, which could become more significant in the future if we were faced with the imposition of quotas.

##### Adaptation to climate change

Operating in several countries with a dense, granular network of stations, necessitates EMG's adaptation to the repercussions of climate change. Over the past few years, the Group has already seen the effects of climate change in the form of extreme weather events (floods, heatwaves, forest fires, hurricanes...) or with regular drought and water restrictions.

These events can have a direct impact on business (slowing down activity, closure of stations) and potentially damage assets. Globally, the leisure and travel sector is exposed to physical risks related to climate change. In addition to these events, which are likely to repeat in the years to come, the global rise in temperature and long-term shift in climate patterns are factors to be taken into account, insofar as they could lead to changes in leisure-related uses and behaviors (eg: currently geared towards sunny destinations). Failure to clearly identify physical risks and anticipate transition risks could have a negative impact on business performance, both in the short and long term.

In addition, the absence of a climate change adaptation plan may also have an impact on employees and customers: on working conditions, on the availability of services provided, on health and safety, when it comes to heat waves and/or extreme weather events.

##### Use of resources

The main resources used by EMG to deliver its service are vehicles. There is therefore little or no consumption of raw materials by EMG. However, vehicles are highly dependent on raw materials: rare metals, critical minerals. The progressive depletion of rare metals and critical minerals is therefore a factor that EMG cannot ignore, given the repercussions this may have on its supplies. In recent years, the Group has already had to face a shortage of silica, affecting car manufacturers' supplies of semi-conductors and ultimately leading to a shortage of new vehicles on the market.

With the development of electric vehicles, demand for aluminium, nickel, cobalt, copper, graphite, lithium and manganese, particularly for battery production, is set to increase significantly and rapidly. Dependence on producing countries is very high and the repercussions on the automotive market could be considerable, with new scarcities and an increase in vehicle prices ; which factors are considered as risks by EMG. We also consider an indirect negative impact: as we represent a major demand of supply for vehicles from manufacturers, we take part in natural resources depletion and limitation of local communities' access to resources.

Lastly, we also see a potential opportunity. Indeed, based on the experience of the recent shortage of semiconductors that the automotive industry faced after the COVID crisis, the subsequent shortage of newly manufactured cars may also lead to a higher demand for rental cars and potentially to a significant increase in rental prices.

##### Material environmental matters

##### Water management

Water management has long been a focus for attention for EMG: water is mainly used in car wash operations – which consumes large amounts of water, energy and detergents – and vehicle cleanliness is at the heart of the quality of service we provide to our customers.

Vehicle washing is either carried out on-site in stations having their own facilities (using our own vehicle preparators or external subcontractors), or off-site at external public or private washing facilities, when no on-site options are available, leveraging either internal staff or external workforce depending on locations.

EMG has already made progress in using less water while keeping our promise to our customers with the introduction of the 'Quick Turnaround' program, which consists in washing vehicles without water nor movement, and with the implementation of good practices such as the use of recycled water for washing.

But as water is becoming more and more a scarce resource, EMG will have to revisit its practices in the coming years, taking into consideration water restrictions in the regions where it operates.

To reinforce its responsible use of water, EMG will also have to look at water discharge in its own operations and water consumption in its value chain.



## Contribution to circular economy

At Europcar Mobility Group, we believe that shared mobility is a critical part of the solution the world needs to transition towards a low-carbon economy. Indeed, vehicle rental is all about sharing an asset with several other people, thus contributing to the development of the usage model ('a car, only when you need it') as opposed to the ownership model.

In addition, Europcar Mobility Group is also active in the sale of used cars, thus contributing to the circular economy. A portion of the EMG vehicle fleet consists of "at-risk" vehicles, which we sell on second hand markets after a detention period.

Used cars with minor wear and tear are distributed via different remarketing channels, through which they can reach mainly B2B but also B2C customers, searching for more affordable prices. And as the European Union pushes for greener initiatives, the market for second hand EVs will likely expand rapidly; car rental players being on the front line to make these vehicles accessible.

## Vehicles end-of-life management

As already mentioned, we source our fleet through varying models: buy and then hold for resale on the used cars / second-hand market ("at-risk" model), on leases ("lease" model) from third parties, on contracts with car manufacturers with a guaranteed resale value ("buyback" model).

For "at-risk" vehicles: while used vehicles with minor wear and tear are sold on second-hand markets (see above), heavily damaged accident vehicles, including those classified as total losses (i.e. wrecks), are sold to auction houses for the spare parts market.

End-of-life vehicles can therefore have a negative impact on the environment, if the dismantling of wrecked vehicles is not properly managed by professional buyers: e.g. end-of-life ICE vehicles can lead to hazardous fuel and oil leaks, end-of-life EVs (PHEVs, BEVs) present recycling challenges due to the presence of lithium, cobalt and other rare materials, and improper disposal can lead to environmental damage.

Our processes and policies must ensure that our professional buyers follow proper recycling and disposal procedures.

## Social topics

### Most material social matters

#### Diversity and inclusion

Our wide range of jobs, from stations to headquarters, offer rooms for professional inclusion, whatever the background and the level of education. With more than 90 nationalities represented within our Group and a balanced gender representation in our workforce, we are truly a "diversity company", reflecting the diversity of the Society and having a truly positive impact in this sense.

However, we must ensure that this asset is protected and developed as a key differentiator, and that our diversity is not "hit" by inclusion issues (such as discrimination, harassment, lack of equal treatment...), but rather that we are able to create an inclusive environment that upholds our values.

### Material social matters

#### Health and safety of EMG employees

Although its activities do not a priori give rise to any specific occupational disease, the Europcar Mobility Group is nevertheless aware of the potential health and safety risks that exist, both in the stations and at head office, and of the possible work-related factors to which its employees may be exposed, whatever their profile (psychosocial risks, musculoskeletal disorders, cold, noise, etc.).

2/3 of EMG employees work in stations: either in direct contact with customers at the counter, or at the rear base in maintenance areas or in parking lots. The station is by definition an environment presenting several constraints and factors generating risks for both safety and physical health: incivility of customers creating stress, slippery nature of the floors at the rear base linked to vehicle cleaning operations, movement of vehicles... Overall, the Group is committed to protecting the health and safety of its employees wherever it operates, and to maintaining low workplace-accident frequency and severity rates.

#### Working conditions at EMG

As a result of its international presence, the Group must comply with a wide range of local labor laws. These are often more stringent than the directives of the International Labor Organization, which it complies with. Beyond strict compliance with labour laws, the Group proactively manages the social constraints specific to its operating environment.

As the Group operates in airports, train stations and public car parks in city centres, i.e. in areas and facilities that it does not own, it is faced with constraints and dependencies in maintaining and improving the working conditions of its employees in the stations.

Space, cleanliness, noise, temperature, available furniture are some of the key areas of attention, as well as IT tools / applications and uniforms, which are considered as critical support for the daily service delivery.

Working conditions are part of the transparent and constructive social dialogue that the Group wants to have with its employee representatives.

#### Working conditions, diversity and inclusion in the value chain (at suppliers and at franchisees)

The car rental supply chain is complex and includes a wide variety of suppliers, some of which require a high level of physical or mental intensity from their employees. For its operations, EMG works with a large number of suppliers and manages a large number of contractual relationships (around 20,000 non-fleet suppliers, more than 300 fleet suppliers).

With this in mind, EMG must ensure that its suppliers meet its standards in terms of working conditions, diversity and inclusion, assessing them on those criteria, whatever their activity. This responsible sourcing approach is essential because the value chain reflects the Group's ethics and values.

Lastly, this approach paves the way for the requirements of the forthcoming legislation (CS3D).



With regard to non-fleet suppliers, EMG has specifically identified sectors that need to be systematically assessed on social criteria (working conditions, health and safety, equal treatment...): e.g. call centres, car wash stations, repair and maintenance services, cleaning services, transport and moving of vehicles, goodies and uniform suppliers.

The same vigilance must apply to EMG franchisees. As already mentioned, the car rental business involves a variety of activities that expose employees to a number of potential negative impacts due to potentially poor working conditions. And as far as our franchisees are concerned, some of them operate in countries where potential situations of discrimination and/or harassment can emerge.

EMG's franchisees independently manage their workforce, as well as their fleet and their suppliers, and EMG cannot interfere in their operations. However, EMG considers that it has to exercise its duty of care towards its franchisees: this means that franchisees' employees must be able to carry out their activities in appropriate conditions, in line with the Group's standards in terms of working conditions and D&I, and that it is the Group's responsibility to prevent and mitigate any potential negative impacts that may affect franchisees' employees.

### Consumers health and safety

As a mobility service provider, it is vital for EMG to understand the situations that its customers may encounter during their rental experience, which may affect their health and safety.

Customers renting vehicles for vacations or business reasons may be less familiar with vehicle handling and local driving regulations, they may drive in unfamiliar locations and under time constraints, they also may be confronted to vehicle maintenance issues or increased exposure to driving-related fatigue: all of these situations increase their risk of accidents or misuse of vehicles.

Customer health and safety considerations necessitate tailored risk management strategies to address specific needs and circumstances: from customer education and support to sanitization of vehicles, from regular repair and maintenance to recall of defective vehicles.

### Transparent information in the customer relationship

EMG is a "by people for people" company whose performance is closely linked to customer satisfaction. With this in mind, the Group is constantly striving to improve the customer experience, one of the key components of the Group's strategy.

Vehicle rental involves entrusting a customer with a costly asset for the duration of the rental period, during which the customer may be faced with numerous unforeseen events.

Transparent information on the terms and conditions of the contract, as well as all through the rental experience, is therefore absolutely critical and the basis of customer satisfaction.

Failure to meet this basic need and expectation is considered a risk by EMG. That's why we are committed to minimising the risk of misinformation,

building trust and strengthening our relationship with our customers through accurate and reliable information.

## Governance topics

### Material governance matters

#### Business ethics

Business ethics and corruption are important issues for EMG, given the exposure to bribery, corruption and potential anti-competitive practices in the vehicle rental industry and also, given its worldwide footprint.

Corruption and bribery risks are not specific to the vehicle rental sector, while anti-competitive practices are a potential area of drift, given that daily rental prices are the result of market dynamics (supply and demand) and are very sensitive to competition.

Unethical practices, corruption & bribery have the potential to severely impact our reputation and financial performance. They can result in legal penalties, financial losses and damage to the brands. Failure to manage these risks could not only disrupt our business, but also significantly damage the reputation and integrity of the company.

#### Data protection

EMG's business involves a large number of bookings that require customers' personal data. EMG also manages employee and supplier data. The Group is subject to strict regulations, such as the GDPR in Europe. All of these elements explain why data

protection / data privacy considerations are high on EMG's agenda and why data protection is a cornerstone of our Group's commitment to ethical business practices and of customer trust.

As a consequence, it is crucial for EMG to have robust data privacy and cybersecurity measures in place to protect this data, not only to comply with relevant regulations but also to proactively manage its risks.

### Responsible relationship with suppliers and with franchisees.

Both for Fleet and Non-Fleet Procurement, the Group works with a large number of suppliers and contractors, and ensures it is not exposed to the risk of depending on only a few strategic suppliers, as demonstrated by the size of its suppliers portfolio.

On the other hand, we want to develop and maintain a responsible relationship with them, which requires a set of guidelines, policies and procedures to manage the relationship at every stage, ultimately contributing to the financial stability of our suppliers and avoiding situations of dependency for them.

As regards relations with franchisees, the challenges are different: the common objective of EMG and its franchisees is to develop mutually beneficial and fruitful relationships, thanks to an appropriate support provided by the Group for the franchisees' business development.



1.4.3

Overview of the material impacts, risks and opportunities for EMG

ESRS Standard	SUSTAINABILITY MATTER	TYPE OF IRO*	IRO
E1 Climate change	GHG emissions	NEGATIVE IMPACT	Contribution of EMG's activities to climate change
		RISK	Higher costs linked to electrification of the fleet and network
	Adaptation to climate change	RISK	Decrease of volume leading to loss of rental days income due to wrong positioning and sizing of stations (for example in locations heavily affected by climate change or by changes in behaviour regarding air travel)
		RISK	Costs linked to the deterioration of equipment and fleet because of extreme weather events (tornados, storms, long heat waves, ...) and unadapted location of stations (submersion)
		RISK	Costs or fines linked to regulations reflecting long-term shift in climate patterns (electricity, water restrictions,...)
E2 Pollution	Air pollution	NEGATIVE IMPACT	Endangerment of ecosystems due to use/release of pollutants in the air
		NEGATIVE IMPACT	Endangerment of the health (illness, injury, death) of people due to release of pollutants in the air
E3 Water and marine resources	Water Management	NEGATIVE IMPACT	Water discharge: deterioration of water quality for local populations, following the utilization of water by EMG's operations (use of water in car wash, at parkings, offices, stations)
		NEGATIVE IMPACT	Water consumption in the value chain: excessive utilization of resources by EMG's value chain operations (use of water by car wash, car manufacturers...) contributing to nature degradation as well as limitation of local communities' water access (considered as a rare resource)
		RISK	Water consumption at EMG own operations in a context of water restriction: degradation of vehicle cleanliness, leading to a lower service quality and customer dissatisfaction.

\*Impacts, Risks and Opportunities



ESRS Standard	SUSTAINABILITY MATTER	TYPE OF IRO*	IRO
E5 Resource use and circular economy	Use of resources	NEGATIVE IMPACT	Natural resources depletion: utilization of rare resources for car manufacturing contributing to nature degradation as well as limitation of local communities' access to resources
		RISK	Stop sell for EMG due to disruption in production at car manufacturers
		OPPORTUNITY	Scarcity of vehicles leading to higher purchase prices but also higher rental prices (in a context of low offer / high demand)
	Sharing and circular economy	POSITIVE IMPACT	Contribution to the circular economy via the sale of used cars on the second-hand market.
	Vehicles end-of-life	NEGATIVE IMPACT	Waste indirectly generated by end-of-life stage of vehicles (at-risk) leading to potential damages on the planet.
S1 Own workforce	Diversity and inclusion	POSITIVE IMPACT	Capacity to recruit regardless of qualifications, backgrounds, social origins, ... in stations (2/3 of the Group) thus favouring social and professional inclusion
		NEGATIVE IMPACT	Non-respect of diversity and inclusion principles and regulations towards EMG employees, including: discrimination against specific communities/categories, moral or sexual harassment in the workplace, lack of equal treatment between men and women
		OPPORTUNITY	Capacity to differentiate EMG from other companies for its diverse and local workforce
	Health & Safety	NEGATIVE IMPACT	Endangerment of the physical integrity and mental health of EMG employees and contractors due to poor working conditions: <ul style="list-style-type: none"><li>• occupational illness, injury, death,</li><li>• psychological and moral impacts, reduction in motivation/commitment/efficiency.</li></ul> May also lead to loss of salary and economic insecurity for EMG employees due to work interruptions.
	Working conditions	NEGATIVE IMPACT	Unadapted working conditions can lead to an endangerment of the general health of EMG employees, which can also have individual consequences on the employee and potential effect on their relatives/family.
S2 Workers in the value chain	Workings conditions in the value chain	NEGATIVE IMPACT	Endangerment of the physical integrity and mental health of EMG value chain employees due to poor working conditions: <ul style="list-style-type: none"><li>• occupational illness, injury, death,</li><li>• psychological and moral impacts,</li><li>• reduction in motivation/commitment/efficiency.</li></ul> May also lead to loss of salary and economic insecurity for EMG value chain employees due to work interruptions.

\*Impacts, Risks and Opportunities



ESRS Standard	SUSTAINABILITY MATTER	TYPE OF IRO*	IRO
S2 Workers in the value chain	Diversity and inclusion in the value chain	NEGATIVE IMPACT	Endangering the moral or physical integrity of EMG value chain employees due to: <ul style="list-style-type: none"><li>discrimination against specific communities - moral or sexual harassment in the workplace</li><li>lack of equal treatment between men and women</li></ul> May also lead to a motivation/commitment/efficiency reduction of EMG value chain employees.
	Workings conditions at franchisees	NEGATIVE IMPACT	Endangerment of the physical integrity and mental health of EMG franchisees' employees due to poor working conditions: <ul style="list-style-type: none"><li>occupational illness, injury, death,</li><li>psychological and moral impacts,</li><li>reduction in motivation/commitment/efficiency.</li></ul> May also lead to loss of salary and economic insecurity for EMG franchisees' employees due to work interruptions.
	Diversity and inclusion at franchisees	NEGATIVE IMPACT	Endangering the moral or physical integrity of EMG franchisees' employees due to: <ul style="list-style-type: none"><li>discrimination against specific communities</li><li>moral or sexual harassment in the workplace</li><li>lack of equal treatment between men and women</li></ul> May also lead to a motivation/commitment/efficiency reduction of EMG franchisees' employees.
S4 Consumers and end-users	Consumers Health and safety	NEGATIVE IMPACT	Endangerment of the physical integrity of customers due to a lack of safety for customers (bad preparation, poor maintenance, absence of stop-sell decision, lack of information provided to customers...)
	Transparent information in customer relationship	RISK	Lack of transparent information in client relationship > Engagement of EMG's liability and/or deterioration of reputation, leading to a loss of trust from stakeholders and market losses.
G1 Business Conduct	Data protection	RISK	Failure to comply with obligations relating to the protection of personal information / GDPR that may lead to fines/ infringements
	Business ethics	RISK	Business continuity disruption (delays, loss of efficiency, legal cases, retaliation from aggrieved stakeholders, etc.) due to unethical business practices.
	Responsible relationship with suppliers	NEGATIVE IMPACT	Economic instability for suppliers due to their dependence on EMG (pricing pressure, imposed payment practices, etc.).
	Responsible relationship with franchisees	POSITIVE IMPACT	Efficient EMG support for franchisees' business development.

\*Impacts, Risks and Opportunities



2

# ENVIRONMENTAL INFORMATION

- 2.1 Climate change and pollution
- 2.2 Water
- 2.3 Resource use
- 2.4 Circular economy





## 2.1 Climate change and Pollution (ESRS E1, ESRS E2)

The following pages cover the subsequent material sustainability matters for EMG:

- GHG / CO<sub>2</sub> emissions → ESRS E1
- Air pollution → ESRS E2
- Adaptation to climate change → ESRS E1

### 2.1.1 – Strategy related to carbon reduction and air pollution mitigation

After joining the Science Based Targets initiative in 2019 and submitting its reduction targets in 2021, the Group has defined and launched a systemic **Carbon Reduction Plan**.

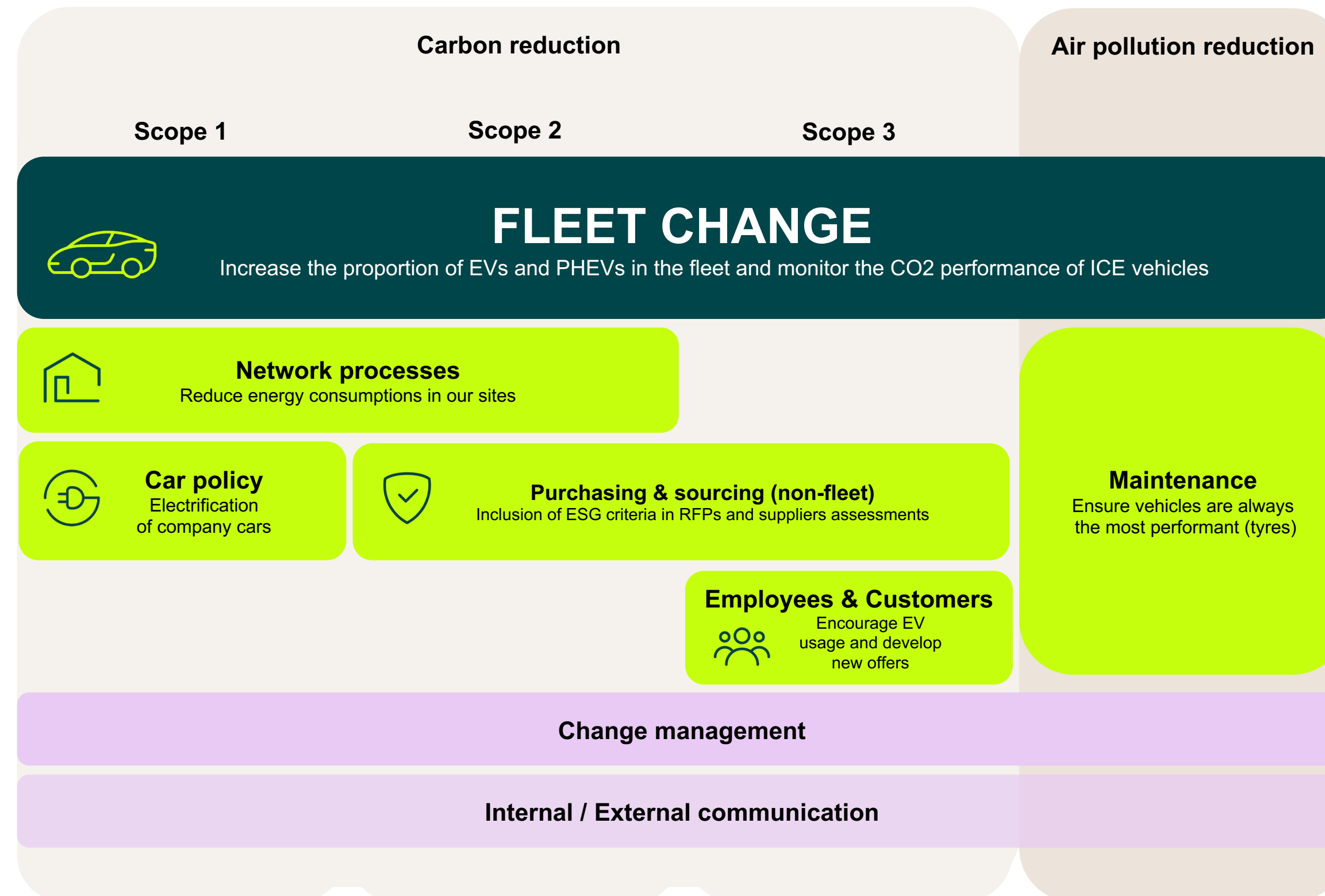
This plan includes various levers to reduce carbon emissions for the company, among which monitoring the carbon emissions of our fleet is our main lever:

- Scope 3 is predominant in the Group's carbon footprint, representing approximately 95 % of the Group's total emissions. Within Scope 3, **the use of our fleet by our customers outweighs the other sources of emissions**, representing approximately 90% of our Scope 3.
- Therefore, if we want to significantly reduce our CO<sub>2</sub> emissions, our main lever consists in offering our customers an increasingly "CO<sub>2</sub> light" fleet so that they can drive sustainably and with less impact on the environment.

The plan has then been complemented in 2024 by levers for the mitigation of air pollution, thus becoming our **Carbon and Pollutants Reduction Plan**.

Indeed, we consider that the air pollution to which our Group contributes has the same origin as our GHG emissions - namely the use of vehicles by our customers -, and we can activate a common lever to limit our impact: the **introduction of the "best possible" vehicles in our fleet in terms of CO<sub>2</sub>, but also NO<sub>x</sub>, CO and PM emissions**.

#### Group's Carbon and Pollutants Reduction Plan



#### Fleet change

All actions required to support fleet changes in our sourcing strategy are clearly our main levers for carbon reduction.

Since the end of 2019, our Group has been rolling out its "One Sustainable Fleet" program, which aims at increasing the proportion of electrified vehicles within our fleet. The program has been adapted in 2024, to ensure that we also source ICE (Internal Combustion Engines) according to the highest possible standard in terms of carbon efficiency (i.e. with the latest motorizations, thus meeting the latest fuel consumption and CO<sub>2</sub> emissions standards).

These objectives are translating into a CO<sub>2</sub> roadmap, with CO<sub>2</sub> targets to reach for the in-fleeting activity, at Group level and in countries.

The "One Sustainable Fleet" program is not only about sourcing and purchasing less CO<sub>2</sub> emissive vehicles. The program also includes:

- Equipment of our stations in charging infrastructures.
- Partnerships with charging operators to facilitate:
  - recharge in stations between rentals (in case of peak periods)
  - recharge "on the go" of our customers (through partnerships with charging providers like Shell Recharge Solutions).



## Network processes

The Group is making efforts across its network to limit the impact of certain operational processes that are by definition carbon emissive.

In that perspective, our stations are encouraged to reduce "non-revenue generating vehicle movements", i.e. movements associated with vehicle cleaning or other movements associated with station operations. Several countries also use the "Quick Turnaround" programme to wash vehicles without water or movement. This programme not only saves water and optimizes vehicle preparation, but also eliminates the need to move vehicles, thus reducing fuel consumption and CO2 emissions.

In addition, our operations in countries are also encouraged to source renewable energy suppliers for their electricity purchases and to make smart choices in terms of electricity consumption (eg - LED lighting).

## Maintenance

To mitigate vehicle pollution (NOx, CO, PM), we have two levers:

### • Purchasing vehicles which are low-emissive and less polluting / "clean", which means:

- Purchase clean vehicles (EV, hydrogen) that are not emitting any NOx, CO, PM,
- Or purchase vehicles equipped with the latest Euro standard motorizations, as car manufacturers are improving vehicle performance in this direction year after year (nb - car manufactures are implementing post combustion filters, such as particle filters, catalytic systems...).

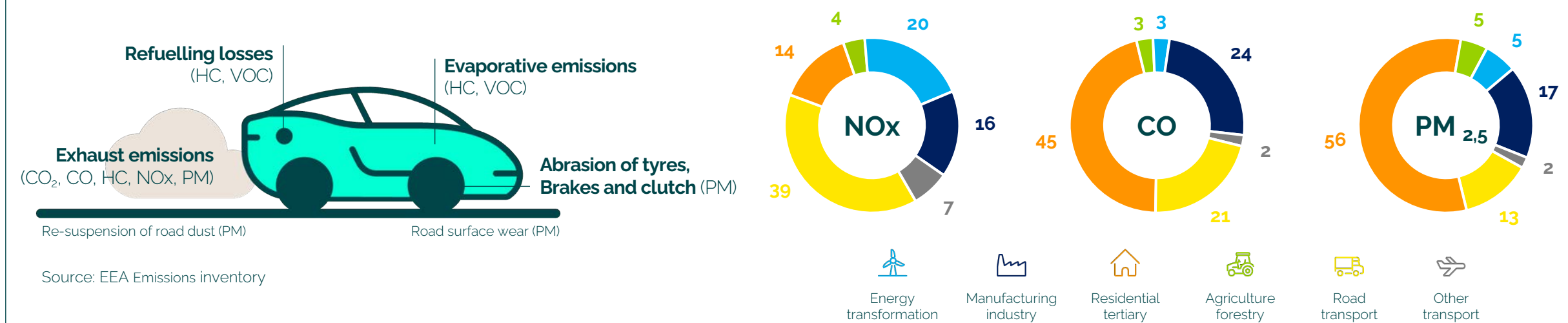
In any case, we approach pollution reduction within our CO2 reduction plan, considering the following profiles:

- CO2 emissions from "worst to best": Petrol - Diesel - Hybrid - Plug-in Hybrid - EV
- NOx, CO, PM emissions from "worst to best": diesel - petrol - hybrid - plug-in hybrid - EV

### • Ensure a proper maintenance of our vehicles in the fleet, to limit abrasion of tyres, brakes and clutch.

- Some studies show that more than 50% of carbon particle pollution is coming from tyre abrasion (source : ADEME)
- Tyres and brake pads are the focus of the Group's attention. Renting vehicles generates an intensive use and therefore faster wear and tear on tyres and brakes (especially tyres).
- Keeping tyres in good condition means keeping them properly inflated to limit wear (under-inflation leads to 25% more wear).

## Automotive industry partly contributes to air pollution by NOx, CO and PM



## Purchasing and sourcing (non-fleet procurement)

This lever is mainly activated in two directions: in the assessment of our suppliers and partners on ESG criteria, notably thanks to the EcoVadis data base, and in the preference given to suppliers which are localized in the regions / areas where we operate to avoid as much as possible CO2 emissions linked to transport of goods.

## Company cars policy

Our Group considers that employees have to "walk the talk" when it comes to reducing carbon emissions and fostering sustainable mobility.

In that perspective, company cars proposed to our employees are increasingly hybrid, plug-in hybrid or full electric. Managers with a company car in their compensation package are encouraged to opt for a low-emission vehicle.

Some local initiatives have been implemented to support this transition. As examples:

- In Germany, all employees entitled to a company car are limited in their use of an internal combustion engine (ICE): a maximum of 60 days and no more than 5 times a year.
- In the UK, a partnership with CBVC Vehicle Management has been set up to encourage employees with company cars to go electric which resulted in nearly 80% of company cars being electric. Additionally, HQ employees benefit from a support on half of the installment costs of home charging points. As for the employees in stations, EV charging benefits are provided through on site charging or an EV charge card that drivers can use for remote charging.
- In Spain, EV cars are included in Company cars' brands and models. Also, some employees (Directors and other employees in Portugal) benefit from a subsidy on their electric charge by the Company.
- In the EMG Headquarters in Paris, employees have access to several charging stations within the building's parking.



## Employees & customers

Our Group is convinced that vehicle rental is a fantastic way for customers to learn about electric mobility. That's why we are putting a lot of effort into increasing the utilization rate of our EVs in the fleet.

Our efforts start with our employees: the objective that we pursue year after year is to familiarize customer-facing employees with the specific features of electric and plug-in hybrid vehicles so that they can make recommendations and give advice to customers.

At the same time, we are committed to developing attractive offers to our customers, including a wide choice of electric vehicles. For example, our myEuropcar subscription offering includes combustion engines as well as the most recent and attractive models of EVs.

In addition, our local marketing teams regularly organise test drives for B2B and B2C customers to accelerate the adoption of electric mobility in the countries where we operate and promote EVs through marketing campaigns, while ensuring that green washing is a red line not to be crossed.

## Change management

The adaptation of the company to the challenges described above is being supported by a number of actions and measures:

- A specific training program\* for station employees (via 10 e-learning modules and on site training as mentioned above).
- New specific KPIs to measure performance (CO2 status, EV share, EV utilization rate, EV conversion rate...).
- Ad hoc EV champions (project leaders) and local/global committees as described before to adapt tools and processes.
- A set up for stations to cope with EVs: own charging poles, partnership to access additional chargers, specific signage, right individual protection equipment.
- Audit and transformation office to control roll-out in each and every station.
- Lastly, tools to support customer adoption: EV guide, charge card and clear invoicing.

*\* In addition to training staff in stations about the specific features of electric and plug-in hybrid vehicles, the Group also aims at raising employee awareness about climate change and its consequences.*

*The main tool used by the Group is the Climate Fresk; a tool which has been proactively deployed towards HQs employees and employees belonging to the Group's Senior Leadership team over the past few years.*

The Group also considers that reducing carbon emissions is a transition that must be supported by investments, if possible backed by sustainable finance instruments and subsidies.

### Investments

We are investing in grid capacity increase and charging pole installations in our stations. In addition, we support the pole installations performed by parking owners via the monthly parking fees which are charged back to us.

### Sustainable finance

In September 2021, our Group launched a 500m euros Sustainability-Linked Bond (SLB) to refinance its fleet on the basis of "fleet greenification" criteria. See our sustainable performance targets and metrics related to SLB - page 33.

The perimeter of the sustainability-bond was set for the following countries: Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Luxembourg, Norway, Portugal, Spain and the UK. Vigeo Eiris, a subsidiary of Moody's, provided the second party opinion for this transaction, assessing the relevance of the sustainable performance indicators chosen by the Group as well as the ambitious nature of the related objectives, issuing the "Advanced" rating for both.

This bond issuance was the first of this kind for Europcar Mobility Group and the first in the vehicle rental sector.

### Subsidies

We are convinced that our Group can play a role in accelerating the uptake of electric mobility: offering electric vehicles on a "try before you buy" model, offering charging points for electric vehicle drivers, putting on the second-hand market affordable EVs... When and where possible, our Group applies for public funding and aims to conclude agreements with the public sector in order to benefit from financial support for equipping our network of stations with charging infrastructure.

- As an example: in 2024, EMG in Australia gained the support of ARENA (Australian Renewable Energy Agency) thanks to a \$4.76 million funding to support the equipment of our 41 sites with 256 chargers, which will facilitate the deployment of approximately 3,100 extra passenger electric rental vehicles over the next three years.
- More globally, we take advantage of all local bonus schemes on EV purchase or charging pole installations (such as the ADVENIR program in France).

## Communication (internal / external)

The Group regularly communicates internally and externally on the progress of its plan, its ESG ratings and the role played by each Function in these achievements.



2.1.2 – Policies related to carbon reduction and air pollution

POLICY	Description of the key contents of the policy
Group Code of Conduct	The Code of Conduct describes the responsibilities of EMG's employees, notably regarding environmental issues as well as the expectations regarding the protection of the environment. A focus is made on Carbon reduction actions.
Fleet budget guidelines, including CO2 guidelines for each country	The document includes CO2 targets per country among other targets. Methodology is described in the Group CO2 roadmap.
Company cars policies	The company car policies include a large selection of electric vehicles to encourage employees to choose one when selecting a company car.
EV framework and anti-greenwashing guide	A specific document has been developed to guide communications experts on the promotion of EVs and how to avoid green-washing

2.1.3 – Actions related to carbon reduction and air pollution

GHG emissions / carbon reduction

In 2024, the actions rolled-out were mainly focused on 4 levers:

- Fleet change / "One Sustainable Fleet" program:
  - Creation of a fleet planning tool integrating CO2 criteria
  - Continuation of the installation of chargers in stations
  - Continuation of EVs sourcing / in-fleeting
- Network processes:
  - Progressive switch to LED lighting in stations and offices
  - Progressive switch to renewable energy suppliers
- Customers:
  - Numerous events in countries to evangelise EVs (EVs test drive)
- Purchasing and sourcing:
  - Hiring of a Sustainable Procurement referent at Group level.
  - "Move To Cloud programme" aiming at transitioning from datacenters to cloud solutions allowing a significant reduction in the carbon footprint associated with IT processes.

Air pollution

In 2024, the actions rolled-out were mainly focused on 3 levers:

- Technical Trainings have been made available to countries to improve tyre pressure check during vehicle turnaround.
- Quality of tyre check is measured through tyre pressure telemetry using vehicle connectivity and NPS verbatim analysis. A dashboard is made available to countries.
- Roll-out started in Q3 2024 and will go on with each new employee (Repair & Maintenance employees) as part of their onboarding process.



2.1.4 – Metrics and targets related to carbon reduction and air pollution mitigation

2.1.4/ 1 – Metrics related to carbon reduction and air pollution mitigation

Energy consumption metrics

	Unit	EMG excl. Euromobil	EMG incl. Euromobil
Total energy consumption - incl. electricity, fuel, natural gas and heat	MWh	571,944	578,559
Total electricity consumption	MWh	31,594	31,760
Share of renewable electricity in the total electricity consumption	%	36%	36%
Energy intensity	kWh/€	-	0.17

GHG emissions metrics

GHG emissions and total gross scopes 1 and 2

None of EMG's Scope 1 emissions are from regulated trading schemes.

Scope 2 Location-based: This method calculates emissions based on the average energy mix of the local electricity grid, without considering specific choices regarding green electricity purchases.

Scope 2 Market-based: This approach takes into account specific energy supply contracts (such as renewable energy certificates), reflecting the choices for lower-carbon electricity.

in tCO <sub>2</sub> e	Scope 1	Scope 2 Location-based	Scope 2 Market-based
Group HQ	220	60	0,04
Australia	1,919	1,430	1,381
Belgium	1,278	98	74
Denmark	1,668	276	446
Finland	100	8	19
France	6,156	228	0,13
Germany	3,684	1,087	86
Ireland	1,784	301	293
Italy	10,742	157	193
Luxembourg	52	28	24
Netherlands	317	97	89
New Zealand	378	38	52
Norway	182	4	0,008
Portugal	3,581	363	767
Spain	12,578	1,163	887
United Kingdom	15,658	2,037	925
United States	63,013	5,332	6,784
<b>Total EMG excl. Euromobil</b>	<b>123,309</b>	<b>12,704</b>	<b>12,020</b>
Euromobil	1,597	77	0,006
<b>Total EMG incl. Euromobil</b>	<b>124,906</b>	<b>12,781</b>	<b>12,020</b>



Our 2024 carbon footprint

Tracking our carbon footprint on an annual basis is of course essential, not only to measure our impact, but also to monitor and adjust our efforts to achieve our 2030 target.

Through a comprehensive reporting system, we calculate our carbon footprint on all 3 scopes:

- Scope 1: emissions linked to direct energy consumptions (fuel, natural gas)
- Scope 2: emissions linked to electricity and heat consumptions.
- Scope 3: indirect emissions mainly linked to the use of our vehicles by customers

in tCO2e	EMG excl. Euromobil	EMG incl. Euromobil
Scope 1	123,309	124,906
Scope 2 - Location-based	12,704	12,781
Scope 2 - Market-based	12,020	12,020
Scope 3	2,596,990	2,645,122
1. Purchased goods and services	121,752	122,120
2. Capital goods	7,901	7,985
3. Fuel- and energy-related activities (not included in scope 1 or 2)	27,703	28,083
4. Upstream transportation and distribution	10,195	11,320
5. Waste generated in operations	2,422	2,466
6. Business travel	5,893	5,900
7. Employee commuting	7,091	7,360
8. Upstream leased assets	350,182	351,891
9. Downstream transportation and distribution		
10. Processing of sold products		
11. Use of sold products	1,075,059	1,078,258
12. End-of-life treatment of sold products	2,489	2,496
13. Downstream leased assets	907,793	948,731
14. Franchises	78,511	78,511
15. Investments		
TOTAL CARBON FOOTPRINT	2,733,003	2,782,809



Evolution of our carbon footprint

The following table presents the evolution of EMG's carbon footprint on the SBTi targets' scope.  
The included entities are: Group HQ, Australia, Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Luxembourg, New Zealand, Norway, Portugal, Spain and UK.

<i>in tCO2e</i>	2019 Baseline	2023	2024	Evolution vs. 2023	Evolution vs. 2019	SBTi target by 2030
Scope 1	119,604	55,735	59,979	8%	-50%	-
Scope 2	7,572	6,072	7,276	20%	-4%	-
Scope 1&2	127,176	61,807	67,254	9%	-47%	-46,2%
Scope 3	3,090,035	2,344,508	1,912,157	-18%	-38%	-27,5%
TOTAL	3,217,211	2,406,315	1,979,411	-18%	-38%	-

Air pollution metrics

EMG emissions of air pollutants:

	Unit	EMG excl. Euromobil	EMG incl. Euromobil
CO	t	4 958	5 118
NOx	t	426	444
PM	t	28	27

Group's Sustainability-Linked Bond metrics

At December 31, 2024, the average emissions of CO2/km for the fleet were:

- 130 g for the full fleet,
- With 116 g for cars,
- And 199 g for vans.

Percentage of EVs and PHEVs (emitting less than 50 g CO2 / km in fleet):

- Scope of our Sustainability-Linked Bond: 11%
- Europcar Mobility Group corporate countries scope: 10%
- Including Euromobil: 10%

Reminder – As part of the issuance of the Group's Sustainability-Linked Bond in 2021, the following sustainable performance targets were defined in order to progressively "greenify" the Group's fleet:

- the gradual reduction in emissions from the Group's fleet, to reach average emissions of 93 g CO2 / km for cars and 144 g CO2/km for vans by the end of 2024,
- 20% of "green vehicles" in fleet by the end of 2024 ("green vehicles": average emissions below 50 g CO2/km),
- the scope for the Sustainability-Linked Bond included: Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Luxembourg, Norway, Portugal, Spain, UK.

Two main reasons explain why the fleet greening targets set in this framework have not been met:

- Slower adoption of electric vehicles by our customers (appetite among BtoB customers, but range anxiety still high among BtoC customers).
- A slower reduction in EV acquisition costs than our forecasts.



## 2.1.4/ 2 – Targets related to carbon reduction and air pollution mitigation

### Our SBTi-approved carbon reduction targets

In 2019, Europcar Mobility Group joined the Science-Based Targets initiative (SBTi)\*, to identify targets for reducing the Group's carbon footprint in line with the Paris Agreement framework.

In 2022, the SBTi validated the two carbon reduction targets submitted by the Group, setting our commitment for the years to come. EMG was the first car rental player to have carbon reduction targets approved by SBTi. These targets will have to be revised with SBTi by 2027.



Europcar Mobility Group commits to reduce absolute scope 1 and 2 GHG emissions 46.2% by 2030 from a 2019 base year.

Europcar Mobility Group commits to reduce absolute scope 3 GHG emissions 27.5% over the same timeframe.

- Scopes 1&2
  - -46,2% between 2019 and 2030  
Aligned with a +1,5° C scenario.
- Scope 3
  - - 27,5% between 2019 and 2030  
Aligned with a well below +2° C scenario.

### Targets related to fleet GHG emissions

In order to achieve the Group's SBTi carbon reduction targets our Group has defined a CO2 roadmap for the fleet, which is at the heart of its "One Sustainable Fleet" program.

The Group's CO2 roadmap, approved by the GEC, is since July 2024 the main reference for Group's fleet "greenification" targets (2025-2030), in succession and replacement of the Group's Sustainability-Linked Bond (SLB) targets.

The Group is considering disclosing its fleet "greenification" targets for 2030 in the context of the forthcoming CSRD, once it is effectively subject to this regulation.

### Targets related to air pollution

Our targets for reducing air pollution are fully correlated with the CO2 reduction targets we have set ourselves. For tyre replacement, a target needs to be set.

However, the first step in 2025 is to ensure that tyre checks and pressure adjustments are carried out correctly, so that a long-term action plan can be devised.

Insofar as we believe that keeping tyres properly inflated is a factor in limiting tyre wear and tear, and therefore a factor in limiting air pollution caused by this wear, the KPI we consider is the percentage of tyres replaced before the vehicle has covered 10,000 km.

*\*SBTi (Science Based Targets initiative) is a collaboration between CDP (Carbon Disclosure Project), the United Nations Global Compact, the World Resources Institute (WRI) and the World Wide Fund for Nature (WWF). More than 10,000 companies have joined the initiative to set their science-based targets. SBTi develops methodologies and frameworks for different industries, helping them contribute to carbon reduction as part of the global effort to limit global warming.*



## 2.1.5 – Strategy related to adaptation to climate change

From 2017, the Group began to integrate the two dimensions of climate change:

- Impact of our business on climate change.
- Impact of climate change on our business.

**With regard to the first dimension, 'the impact of our business on climate change'**, the Group has not only sought to reduce its impact by calculating its carbon footprint (since 2017) and implementing a comprehensive carbon reduction plan (since 2021 - completed by a stream dedicated to air pollutants in 2024) - as described from page 27, but has also sought to develop offers and services to provide its customers with more sustainable mobility solutions, based on the usage model.

**With regard to the 'impact of climate change on our business'**: in 2022, our Group conducted an analysis, with the support of a consultancy.

This in-depth analysis was based on scenario modelling, as recommended by the TCFD (Task Force on Climate-related Financial Disclosures).

The aim of scenario modelling was to:

- Anticipate the impact of different low carbon worlds on the business activities.
- Test the business strategy's resilience and identify business risks and opportunities in each scenario.
- Use the results as "food for thoughts" to inform decision-making and take effective action.

Two antithetical scenarios were proposed, both compatible with the Paris agreement:

- A Tech-driven scenario, where social and environmental transition is based mainly on technological innovations, with still GDP growth but with significant reduction of environmental impacts.
- A Sufficiency scenario, where social and environmental transition is primarily based on resilience, through societal behavioral changes focused on new prosperity objectives.

12 parameters structured the two scenarios: energy transition, openness of the economy, income and wealth inequalities, employment, social prosperity, way of life, territorial dynamics, transport system organization, technological progress, political governance, geopolitics and geo-economy, regulations.

Taking both scenarios into account, the analysis identified risks and opportunities for EMG in the various market segments in which the Group is positioned: leisure travel, proximity, professionals/corporates.

From this, the analysis delivered key takeaways and possible routes for EMG's business transformation in each of these segments, which fed the Group's strategic thinking.

The Group is now considering a complement to this analysis, to be carried out in 2025, in order to evaluate physical risks on its assets and its value chain. This study will help build an adaptation plan and increase the Group's resilience to extreme weather events and effects of climate change.

In this analysis, the following extreme weather events and effects of climate change will be taken account: heat stress, heat waves, drought, hurricane, typhoon, cyclone, storm, blizzard, heavy precipitations (rain, hail, snow / ice), flood (coastal, fluvial, pluvial, ground water).

In 2024, workshops were held by the operations teams to prepare for this study. The aim was to make a preliminary assessment of the following:

- The potential deterioration of fleet and assets in stations due to extreme weather conditions and events.
- The potential impact of power and water restrictions on our Operations.
- The potential deterioration of working conditions for staff and customers due to extreme weather conditions and events.



## 2.2 Water (ESRS E3)

The following pages cover the subsequent material sustainability matters for EMG:

- **Water consumption in our operations – ESRS E3**
- **Water discharge from our operations – ESRS E3**
- **Water consumption in the value chain (downstream) – ESRS E3**

To better address these 3 material sustainability matters, they have been grouped under the category "Water Management".

### 2.2.1 – Strategy related to Water Management

Water management has long been a focus for attention for EMG: water is mainly used in car wash operations - which consumes large amounts of water, energy and detergents - and vehicle cleanliness is at the heart of the quality of service we provide to our customers.

Vehicle washing is either carried out on-site in stations having their own facilities (using our own vehicle preparators or external subcontractors), or off-site at external public or private washing facilities, when no on-site options are available, leveraging either internal staff or external workforce depending on locations.

Over the past years, the water management strategy has focused on reducing in-house water

consumption, with the introduction of the 'Quick Turnaround' program in 2021, which consists of washing vehicles without water or movement:

- At the end of each rental, an assessment is made to determine if the car needs a full wash or if a dry manual wash is sufficient, thus contributing to water consumption reduction.
- As part of this program, a specific report allows better granularity in monitoring the water consumption of the network of stations.

This concern about water management also applied to suppliers. Since 2023, EMG has been assessing its suppliers according to E, S and G criteria, using the EcoVadis database: water management issues are included in the E pillar assessment.

Double materiality assessment conducted in 2024 enabled us to take a more global view of the issue of water in our operations, notably highlighting the risk associated with the lack of access to water for our Operations, due to potential water restrictions / water scarcity. In that perspective, our Operations teams – driven by the Group Head of Operational Excellence - conducted in an in-depth analysis including:

- A mapping of our stations against the overall water risks areas and versus the water stress areas, utilizing Aqueduct database
- An inventory of water management practices so as to highlight best practices in terms of efficiency and sustainability.

This first part of the analysis demonstrated that almost 10% of our corporate stations (directly owned stations) are located in areas with high or very high water risks and 1/3 in areas with high or very high water stress.

The second part of the analysis looked at different methods to wash cars: standard car wash, high pressure cleaning, manual cleaning (with water and products), manual waterless car wash. These methods have been assessed according to various criteria: volume of water required (liters / vehicle), share of recycled water, quality of water discharged (pH, TDS, turbidity), use of chemicals (g/vehicle), energy consumption (kWh / vehicle wash), operational efficiency (min. / vehicle wash)/

The results of these two analyses have been instrumental in shaping a comprehensive Water Management Policy to be published over the course of 2025, which will help reinforce our existing practices and procedures.

### 2.2.2 – Policy related to Water Management

EMG Water Policy outlines Europcar Mobility Group's commitment to responsible water management and conservation, ensuring we operate in an environmentally responsible manner and minimizes its impact on water resources. The scope of application is all our operations managed directly by Europcar Mobility Group in our corporate countries.

In the medium term, we aim at having this policy also extended to our outsourcers, suppliers and partners involved in operations within our corporate countries for them to fully align with our water conservation objectives. In our franchise countries, we will be promoting this water policy and strongly recommending a similar approach.

#### Policy Statement

Europcar Mobility Group is committed to the responsible management of water resources. We recognize that water is a finite and precious resource, particularly in areas experiencing high-water stress and we will strive to minimize our water footprint and protect these resources.

To reach this objective, our company is working on the following themes:

- Regulatory compliance
- Water usage and efficiency
- Wastewater Management and Pollution Prevention
- Education and Training
- Targets and Goals



### 2.2.3 – Actions related to Water Management

#### Actions related to water consumption and water discharge at EMG operations

Below, description of the initiatives initiated in 2024 by the Group Head of Operational Excellence, in close coordination with Operations Directors and Managing Directors in countries:

- 1. Use and Sourcing of Water:** In several countries, we are applying the "Quick Turnaround" program to wash vehicles without water or movement. As already mentioned, this program not only saves water and optimizes vehicle preparation, but also avoids the need to move vehicles. Furthermore, some stations are equipped with water recycling systems, including rainwater recuperation systems, to limit the water taken from the supply networks. Other local initiatives have also been undertaken: Goldcar (Spain) is now working with suppliers that use waterless car-wash techniques, and monitors water consumption at its offices and facilities. In Portugal, contracts with car wash suppliers include clauses requiring them to recycle a certain percentage of water. To go even further, we started an overall auditing of our current consumption practices looking for more efficient sourcing and waste minimisation.
- 2. Commitment to Reducing Water Consumption in High-Risk Areas:** We have identified the high-water stress regions in which we operate and are prioritizing efforts to reduce water use in these areas throughout, for example adapting our processes to lower consumption of freshwater.

#### Actions related to water consumption in the value chain

Sourcing and procurement decisions can have a significant impact on the environment. For Europcar Mobility Group, suppliers involved in vehicle cleaning services play a key role in water management. The company expects suppliers to handle and treat water properly to optimize

consumption and prevent contamination of local water sources. It seeks to collaborate with partners who are committed to improving water management.

In that perspective, Europcar Mobility Group leverages the EcoVadis rating on the sub-theme of water management as it includes an assessment of the supplier's policies and procedures, the implementation of targets and initiatives to reduce water consumption and the publication of traceable and relevant data.

Suppliers whose performance level is below 25 are required to repeat the assessment or carry out an on-site audit, once an action plan has been implemented, in order to demonstrate any progress in this area.



### 2.2.4- Water Management metrics

	Unit	2024 excl. Euromobil	2024 incl. Euromobil
Total water consumption	m <sup>3</sup>	1 552 882	1 554 070
Total water consumption in areas at water risk*	m <sup>3</sup>	189 785	189 785
Share of vehicles washed without movement and water**	%	10.2%	-

*\*The breakdown of the water consumption in areas at water risk is available in the following countries: Italy, Portugal, Spain, United Kingdom, United States*

*\*\*Among stations participating in the "Quick Turnaround" programme.*

*As an illustration, the 'Quick Turnaround' program helped save 80 317 m3 of water (the equivalent of 32 Olympic swimming pools) in 2024.*



## 2.3 Resource Use (ESRS E5)

The following pages cover the subsequent material sustainability matters for EMG:

- Use of resources > ESRS E5

### 2.3.1 – Strategy related to the Use of Resources

As a reminder, the Group's Fleet is sourced through varying models:

- buy and then hold for resale on the used cars / second-hand market ("at-risk" model),
- on leases ("lease" model) from third parties,
- on contracts with car manufacturers with a guaranteed resale value ("buyback" model).

This mixed sourcing model allows flexibility to the Group, in order to optimize the level of vehicle supply, cost of financing and risk according to market situations, and thus face potential market tensions related to material shortages.

So far, EMG's approach to mitigate these repercussions have consisted in leveraging its mixed sourcing model, in order to:

- extend vehicles detention periods (of at-risk vehicles) and renegotiation of buy-back vehicles deals,
- diversify car supply (not only car manufacturers providing newly manufactured cars, but also second-hand cars providers).

Double materiality assessment has allowed us to take a more global view of the resource use in our business, considering not only the risks and opportunities associated with the shortage of vehicles (as a consequence of the shortage of resources at carmakers), but also the environmental impact of increased demand for vehicles (especially electric vehicles) from us in the coming years.

Taking double materiality into account, we have thus identified several levers related to resource use, in order to mitigate impacts and risks and leverage opportunities, that our Group will integrate over the coming years:

Lever	Impact mitigation	Risk mitigation	Oppor-tunities leveraging
Volume of vehicles in the fleet: limiting the number of vehicles in the fleet to be less exposed to market volatility/market tensions in terms of supply, with less environmental impact and potentially higher RPD (rental price per day).	Yes	Yes	Yes
Sourcing of small(er) vehicles / vehicles less intensive in terms of resource consumption*.	Yes		
Giving preference to vehicles with a high degree of recyclability**.	Yes		
Extension of the detention period	Yes	Yes	
Qualification and selection of suppliers* (incl. sustainability criteria)	Yes		
Diversification of suppliers		Yes	

\*Our Fleet Sourcing strategy explicitly states our preference for car manufacturers having addressed the challenge of resource depletion, and for optimization of the usage of our fleet in order to reduce the amount of newly manufactured cars put on the market.

\*\*In terms of impact, EMG believes it will benefit from the technological advances made by car manufacturers and the regulations imposed on them: in particular, the regulations pushing car manufacturers to produce vehicles that are recyclable.

### 2.3.2 – Actions related to the Use of Resources

In 2024, the identification of the above levers has informed the work of the Fleet Engineering team.

More globally, the Fleet Engineering team continuously gathers information on:

- Models available
- SBTI commitments of car manufacturers / Car manufacturers "green" strategy
- Accidentology of each model (through a network of technical counterparts)
- Taxation
- Low-emission zones, access restrictions
- B2C and B2B market evolutions
- Materials / components markets

Fleet purchasing guidelines derive from the analysis delivered by the Fleet Engineering team. Finally, the guidelines are implemented by Fleet Directors at country level. All this information and insights are also taken into account in the annual budget planification.

Note – Given the high dependency that the Group has towards the automotive industry, the Group takes actions that are within its control. The Group believes that the evolution of its demand and preferences can trigger an acceleration of the strategic choices of car manufacturers towards more sustainable resource use.

### 2.3.3 – Metrics related to the Use of Resources

As mentioned above, optimizing the detention period impacts the demand for new vehicles in fleet and thus, the use of resources.

In 2024, the average detention period for the vehicles in fleet was 19 months (excluding Euromobil).



## 2.4 Circular Economy (ESRS E5)

The following pages cover the subsequent material sustainability matters for EMG:

- **Contribution to circular economy (vehicles second-hand market) → ESRS E5**
- **Vehicles end-of-life → ESRS E5**

These two sustainability matters have been regrouped under the theme "Circular Economy" as they are directly linked to the vehicle remarketing activity of EMG.

### 2.4.1 – Strategy related to Circular Economy

As a reminder: in addition to its core rental activity, EMG is also active in the sale of used cars. This activity derives from the proportion of vehicles purchased by the Group on an "at-risk" model. Vehicles purchased "at-risk" are held by EMG and then resold on the used cars market; ie. "remarketed".

The vehicles are categorized into two main groups:

- Used vehicles with minor wear and tear, with which our **contribution to the used cars market** can be significant, considering the number of vehicles that our Group sells each year.
- Heavily damaged accident vehicles, including those classified as total losses, which pose environmental challenges and require a proper **vehicle end-of-life management**.

The primary focus of the remarketing efforts lies within the B2B sector, where most vehicles (particularly accident and total loss vehicles) are remarketed. However, in certain countries, some end-user ready vehicles are also sold B2C.

Double materiality assessment has allowed us to take a more global view of the circular economy potentialities and challenges in our business. Our positive impact via our contribution to the used cars market was already identified, with clear actionable levers. In this area, EMG's strategy - to take advantage of the shift towards sustainability and maximise its positive impact - has so far been to develop its expertise in remarketing channels, in particular online direct sales channels and online auctions. In parallel, our Fleet Remarketing team decided to investigate further vehicles' end-of-life management via a dedicated analysis.

The aim of this analysis was also to better understand the different steps of vehicles disassembly and the potential negative environmental impacts related to disassembly and waste generation, as well as to identify levers to improve the management of end-of-life vehicles:

- Indeed, end-of-life vehicles (ELVs) generate a wide variety of waste materials due to the complex composition of vehicles, which include metals, plastics, fluids, and other materials. As vehicles age or are involved in accidents, their functional components – such as engines, batteries, tires and exhaust systems – become worn or damaged, rendering the vehicle unfit for use. The disposal of these vehicles often results in waste generation.

- The disassembly of vehicles at the end of their operational life creates a mix of materials that need to be processed and either recycled, disposed of, or treated to mitigate environmental impact. These materials may include hazardous substances such as heavy metals (e.g. lead, mercury, cadmium), oils, fuels, and refrigerants, as well as large quantities of plastics and other non-recyclable parts.

The analysis considered the different powertrain types: Internal Combustion Engine (ICE), Plug-in Hybrid Electric Vehicle (PHEV), and Battery Electric Vehicle, which influence end-of-life management in terms of impacts, risks and opportunities (IROs).

### 2.4.2 – Procedures related to Circular Economy

Based on his knowledge and analysis, EMG has established local procedures and guidelines primarily addressing the general and procedural nature of the sale of "at-risk" vehicles, including a dedicated procedure for the sale of heavily damaged vehicles, so called wrecks.

This dedicated procedure applies as soon as the decision to not repair a vehicle has been taken.

Procedure purpose is to:

- Define the scope of wrecks and badly damaged vehicles;
- Describe the management and control tool;
- Identify responsibilities and the validation process.

A Group policy will be issued over the course of 2025 in order to reinforce the Group's sustainable approach to vehicle end-of-life management, integrating circular economy criteria.

The objective of this policy will notably address the dismantling challenges of vehicles, with clear recommendations to buyers of our end-of-life vehicles in order to prevent damages to the environment.

As part of this policy, EMG will look at the following areas of attention:

- Clear categorization of ELVs: introducing distinct categories for ELVs in the system, separate from other types of vehicle damage, will make it easier to track the status of these vehicles and ensure that appropriate disposal or recycling actions are taken.
- System integration with recycling partners: integrating the system with certified recycling centers or parts suppliers can streamline the process of reclaiming green parts and tracking their reuse.



3

# SOCIAL INFORMATION

3.1

Own Workforce

3.2

Workers in the value chain

3.3

Consumers and end users





## 3.1 Own Workforce (ESRS S1)

The following pages cover the subsequent material sustainability matter for EMG:

- **Employees Health and Safety ⇒ ESRS S1**
- **Working conditions at EMG ⇒ ESRS S1**
- **Diversity and inclusion at EMG ⇒ ESRS S1**

### 3.1.1 – Characteristics of EMG workforce

Europcar Mobility Group is a "by people for people" company: this means that our employees are one of our three main assets, along with our fleet and our brands.

- Our own workforce includes various types of employees.
  - **HQ employees:** Group HQ, countries HQs.
  - **Network employees:** either customer-facing or non-customer-facing employees, dedicated to one specific station or to a group of stations, working in a station or a rear base.

Each type of employee group presents specific needs and expectations, as well as differentiated health and safety considerations, as they have by definition a different working environment (stations as opposed to HQ offices) and a generally, a different professional profile.

- Europcar Mobility Group's workforce is primarily concentrated in rental locations ("stations"). Our stations are located in railway stations, airports and urban areas.
- To ensure a high quality of service and manage customers' flows during peak seasons as well as fleet variations, Europcar Mobility Group uses a variety of employment contracts (open-ended + fixed-term + seasonal staff, etc.), as well as part time working.
- One of the major challenges of the Group in terms of workforce management is the annual and intra-weekly (working week versus weekend) seasonality of its operations, which results in significant variations in its activity and accordingly requires optimal management of its teams (integrating rotations of employees and workload adaptation to the activity level).
- The Group also always seeks to promote new forms of work-time organization where possible, to make work more flexible and improve the quality of its employees' life at work. Specifically, home-office agreements for headquarters-based employees have been set up over the past years for all headquarters across corporate countries.

Find out more details about EMG workforce:

- On page 14 - "Interests and views of stakeholders"
- On page 47 - "Own workforce metrics"

### 3.1.2 – Strategy on own workforce at EMG

How we structured our approach, in line with International Frameworks

In 2005, the Group was the first player in the vehicle rental sector to adhere to the principles of the **United Nations Global Compact**, one of the major international initiatives promoting the commitment to human rights, international labor standards, the environment and the fight against corruption.

Every year since then, the Group has reaffirmed its commitment to adhere to all **10 principles of the United Nations Global Compact** - based on the Universal Declaration of Human Rights (**UDHR**), the **ILO (International Labor Organization) declaration**, the **Rio Declaration on Environment and Development**, and the United Nations Convention Against Corruption (**UNCAC**) - and to contribute to the achievement of the **17 United Nations Sustainable Development Goals (SDG)**.

Our company is also committed to respecting and upholding human rights as outlined by the Organisation for Economic Co-operation and Development (**OECD**) Guidelines for Multinational Enterprises.

These principles and guidelines structure the Group's approach to health and safety, working conditions and diversity and inclusion, and have been directly integrated **into the Group's Code of Conduct**, which sets out the Group's commitments to all its

stakeholders, as well as the Group's expectations towards its stakeholders, including its employees.

Group Code of Conduct, issued in 2024, is a complete overhaul of the previous Group Code of Ethics and Commitment, which was submitted to the European Workers Council for consultation and formally approved by this international committee. It is distributed in all countries with systematic submission to each employee and signature by each employee.

To find out more about Group's commitments to human rights and professional behaviors expected from all EMG's stakeholders: please consult the Group's Code of Conduct available on our corporate website

<https://europcar-mobilitygroup.com/compliance/documents/6697a476127b6941717140.pdf>

#### EMG engagement framework

The Group is committed to fostering a highly engaged workforce across all roles and locations. It believes that actively listening to employees and maintaining an ongoing dialogue with employee representatives are not only best practices but also critical to success.

By offering multiple channels for employees to express their views, concerns, and ideas, the company promotes a culture of transparency, open dialogue, and mutual respect. This two-way communication approach is so essential that it has been integrated into the Group's core values.



EMG has implemented a comprehensive framework to engage with employees, helping to identify general concerns, particularly regarding Working Conditions, Diversity & Inclusion, and Health & Safety. These channels also help the company recognize its strengths and further enhance employee engagement.

Different channels form this engagement framework:

Channel for engaging with employees	How the channel is operated	Scope	Frequency
Managerial channel / management practices*	Formal and informal team meetings / 1:1 meetings  1:1 during Performance Development Reviews (PDR)	All employees	<ul style="list-style-type: none"><li>Daily</li><li>Weekly</li><li>Annually (PDR)</li></ul>
HR Business Partner steering	Formal meetings, "hot line" via chat, emails	All employees	On request + Organized periodic meetings with full teams
Labor / social relations**	Formal meetings	73% of the Group's employees are covered by Labor relations / representative bodies**	<ul style="list-style-type: none"><li>Monthly (local workers councils)</li><li>4 times / year (European Workers Council)</li></ul>
Employee Opinion Survey	Online questionnaire 4 questions which consolidated answers help measure the level of engagement + 24 questions to get employees' opinions on 5 dimensions (vision, operating model, work environment, HR topics, reputation of the company) + 3 open questions so as to collect ideas and suggestions (what works well, what needs to be improved)	All employees	In 2022, the Group launched its first "Speak Up!" global opinion survey. It was also carried out in 2023, so as to measure progress made after roll out of specific action plans. The objective is to conduct this survey every 2 years.
Internal Communication	Internal communications channels have been set up to create a top-down, bottom-up communication and provide space for employees to directly ask questions and express their views. This includes: <ul style="list-style-type: none"><li>Internal social network (Facebook Workplace) launched in 2019, where employees can post contents and interact with colleagues and top managers.</li><li>Internal events: conferences, town halls, get together, online events, where employees can get the latest updates about Group's strategy and ask questions.</li></ul>	All employees	Depending on the format/on the tool: <b>At Group level</b> <ul style="list-style-type: none"><li>Online event for all employees &gt; on an annual basis</li><li>Events for Group's top managers &gt; 2 or 3 each year</li><li>Calls for Group's top managers &gt; monthly</li><li>Facebook workplace: daily flow of top-down / bottom-up communication</li> <b>In countries</b> Monthly town halls, annual convention with station managers...</ul>
H&S champions	Injury notification	All employees	When needed as part of the injury reporting process
WeMob network	Formal meetings	WoMob network (approx. 50 employees involved in D&I steering, with a capacity to reach all other employees interested in D&I topics)	Quarterly

\* and \*\*, see next page



### \*Managerial channel / management practices

As part of this framework, EMG encourages the development of management practices where everyone in a team has a voice and can speak up.

This aspect was supported in 2024 by the launch of the Group's new values and, more specifically, by the distribution to the Group's Senior Leadership Team of a manual translating the values into key behaviours and management tips for sustained two-way communications.

A dedicated e-learning has been pushed to all employees and all managers, in order to ensure they understand how these values help to shape our culture and guide our way of working and decision-making.

### \*\*Labor / social relations

Labor relations at Europcar Mobility Group are maintained through a constant and constructive dialog with management teams, employees and employee representative bodies.

As a result of its international presence, the Group must comply with a wide range of local and labor laws. These are often more stringent than the directives of the ILO (International Labor Organization).

- In every country that has a legal framework for employee relations, Europcar Mobility Group complies with local law and regulations. This is the case, for example, in Germany, France, Spain, Italy

where labor relations are organized through employee representative bodies or workers councils.

- At local country level, the social agreements can notably cover among others, the following topics:
  - Work time (leave, teleworking, reduction in working time...)
  - Compensation, savings and other benefits, including quality of life at work
  - Gender equality in the workplace
  - Health & Safety
- When it is not regulated, social dialogue is managed with the local management through the organization of regular meetings, conferences and employee surveys, or weekly / monthly newsletters.
- Labor relations regarding transnational projects (in European countries) are ensured by the European Workers Council. Only countries member of the EU with a certain number of employees can have one or more representatives in this Council, according to the size of their internal workforce.
  - The European Workers Council is a committee dedicated to providing information and sometimes requesting a consultation of employee representatives but not a place for negotiation.
  - The negotiation of social agreements remains at the local country level.

### Channels for employees to raise concerns and remediation processes

In the case of any negative impacts affecting the workforce, either a group of employees or an individual employee, EMG has various channels to raise concerns and processes for remediation: managers, HR Business Partners, employees representatives, labour doctor (in France), as well as an Ethical Alert Line.

Any employees wanting to raise a concern related to ethics and compliance can use the **Ethical Alert Line; Group's whistleblowing mechanism**.

<https://europcar.whispli.com/lp/ethics>

This channel allows all stakeholders, including employees, to report any compliance or ethical issues – such as infringement of human rights, discrimination, working conditions, harassment, unethical business practices - that may affect them and that they want to bring to the Management's attention.

- The Ethical Alert Line, which is easily accessible via the Group's internal social network (Facebook Workplace) and via EMG's corporate website, can also be easily found through a simple Google search.
- It provides a safe and confidential way for individuals to raise concerns and ensures that they feel supported in raising potential ethical issues.
- This Ethical Alert Line is powered by a third-party mechanism, ie. Whispli, a leading platform to engage anonymously with stakeholders, be it

employees or customers or business partners or any other stakeholder.

- Stakeholders using this tool are informed upfront that:
  - retaliation against someone who in good faith reports a concern will not be tolerated,
  - all reports raised through any of our reporting channels will be promptly assessed and as needed further investigated,
  - any reported concern will be maintained confidential to the fullest extent possible,
  - whistleblowers will receive a confirmation of receipt and will be informed on the status and outcome of the procedure.
- Through an internal process, the Compliance team forwards relevant enquiries received via the Ethical Alert Line to HR Business Partners. This approach guarantees that concerns are handled by the appropriate team in a defined lead time.
- The number of alerts raised and the rigorous management of responses testify to the level of effectiveness of the tool and the degree of confidence that internal and external stakeholders place in this channel.



**Remediation processes** are differentiated according to the scope of the issues reported:

- Collective issues >>> Discussions with management, possibly followed by the establishment of ad hoc committees and/or action plans involving representatives of the employees concerned (e.g. action plan on uniforms).
- Individual issues >>> Face-to-face meetings with the employee, the manager, the HR business partner, and sometimes with employee representatives when appropriate.

For individual issues, specific measures and actions may be taken as part of the remediation process, depending on the nature of the issue:

- Remedial: compensation, restoration of rights, implementation of measures to prevent future harm, information of managers and employees.
- Disciplinary: disciplinary action against individuals or entities responsible for wrongdoing

### 3.1.3 – Policies and actions related to employee health and safety, working conditions, diversity and inclusion

#### 3.1.3/1 – Policies and actions related to employee health and safety

As already mentioned, the Group has a long-standing commitment to protecting the health and safety of its employees wherever it operates, and to maintaining a low frequency and severity of workplace accidents.

#### Internal regulations and H&S procedures in countries

In all its corporate countries, the Group complies with local laws and regulations on occupational health and safety. Health and safety requirements of the subsidiary are described in EMG internal regulations. In addition to internal regulations, countries have defined their H&S internal requirements through internal H&S procedures. Regulatory and mandatory internal requirements are controlled and assessed with review of locations, supported by external H&S consultants in some countries such as Ireland, Italy.

In this framework, countries have a safety management system in place and dedicated committees to monitor H&S matters where required. Each country is responsible to its local authorities for health and safety issues. In the past, some of our countries have distinguished themselves by obtaining ISO certification on a voluntary basis.

As an illustration:

- Italy is certified ISO 9001 (Quality Management Systems) until 24th August 2025 and ISO 14001 (Environmental Management System) until 16th October 2026 for Europcar entity and ISO 9001 (Quality Management Systems) until 24th June 2027 for Goldcar entity.
- Spain is certified ISO 45001 (Occupational Health and Safety Management Systems) and was the first company of the car rental industry to receive the ISO 39001 (Road Traffic Safety Management Systems). Both certificates are valid until 1st December 2025.

- United Kingdom is certified ISO 9001 (Quality Management Systems) and ISO 14001 (Environmental Management System). Both certificates are valid until 13th January 2027.

In 2024, the Group decided to overhaul and strengthen its H&S management with the recruitment of a Group Head H&S, who is currently reviewing existing practices to provide additional expertise and support to the countries with a view to harmonising practices.

#### Global Health and Safety policy

Scope of application: all Group employees, whatever their geography, location, job, position.

In the framework of this policy, EMG renews its commitments in terms of H&S:

- Providing a safe and healthy working environment for all our employees and partners.
- Ensuring that our vehicles and facilities are safe.
- Improving the working environment by identifying hazards and correcting dangerous situations.
- Promoting Health at work: decrease sickness by increasing well-being to the workplace and consider integrating Health promotion programs at group level.
- Upholding human rights and fostering a respectful environment where everyone can contribute through responsible behaviour.

Our Global Health and Safety policy includes all aspects of our operations and activities and describes:

- Key health and safety levers and areas of enforcement: risk management, event analysis, performance monitoring, training, leadership development on H&S.
- Management responsibility for prevention.

#### Actions related to employee health and safety

Group Head of Health and Safety started the roll out of a comprehensive action plan, in order to reinforce existing H&S practices.

To date (achieved in 2024):

- Creation of a network of H&S champions in each country.
- H&S maturity self-assessment carried out in each country (self-assessment based on 5 key priority areas to strengthen H&S culture).
- Inclusion of specific H&S points in the internal audit process. These items are referred to as "red lines" and are used to identify hazards and hot spots related to electrical installations. Internal audits are carried out by the Group Internal Audit & Risk Management department.



### 3.1.3/2 – Policies and actions related to working conditions

EMG has a comprehensive set of policies related to working conditions covering all aspects of the employee's journey.

#### Internal Regulations

Scope: all our subsidiaries in corporate countries have internal regulations. All Internal Regulations refer to the Group Code of Conduct. All employees joining the company must accept the Internal Regulations (acknowledgment process) via Workday (Employee Relationship Management tool). EMG Internal Regulations describe:

- Work organisation: Working hours (working hours, breaks, overtime), Working days and public holidays, Paid leave, reduced working hours, absences, Absence authorisation procedures, Procedures for recovering overtime
- Health and safety: Personal protective equipment, Risk prevention measures, Procedures in the event of an accident at work or occupational illness, Rules for using equipment
- Discipline: Disciplinary penalties for misconduct (warning, suspension, dismissal), Disciplinary procedure to be followed, Employee's right of reply, Protection of personal data / Use of IT equipment, Prohibition of certain practices (harassment, discrimination), Dispute resolution procedures

#### HR policies and processes specifically addressing working conditions:

- Onboarding process
- Learning and development strategy
- Compensation policy
- Health insurance coverage
- IT resources management policy

#### Actions related to working conditions

All the channels and tools mentioned in the "EMG engagement framework" section enable the Group to identify issues requiring action plans. In particular, action plans resulting from the "Speak Up!" survey, employee relationship management tools and station refurbishments are areas offering opportunities to improve working conditions.

#### "Speak Up!" action plans

More specifically, "Speak Up!", the Group employee opinion survey, is a pivotal tool to get employee views on working conditions and identify areas for improvement. Working conditions aspects are addressed by 9 questions in the survey:

- The tools and resources I have access to
- Cooperation between teams, functions etc...
- The ability of my direct manager to manage the team
- The autonomy I have in my job
- The objectives that I am given
- The pressure I feel in my job
- My work life balance

- My material working conditions (workspace, temperature, furniture...)
- The interest of my daily work

Other questions of the survey address D&I and H&S matters:

- Respect for employees on a daily basis
- Respect for diversity and inclusion
- Health and safety standards in the company

"Speak Up!" led to various action plans over the past two years. Action plans can be rolled out at Group level, for all countries, and/or at country or function level. As an illustration, action plans post "Speak Up!" focused so far on the continuous improvement of work organisation and tools/supports in stations, such as uniforms in stations, digital tools, connectivity in stations. These topics are considered by our employees as key areas for the overall improvement of their working conditions.

#### Employee Relationship Management with Workday

- So far, our Group relied on a variety of digital tools for employee relationship management, thus offering a fragmented experience to our staff. To improve employee experience and, as a result, employee engagement and talent management, our Group retained Workday in 2024 as the solution that will support our continuous journey to putting our employees' management at the heart of how we work at EMG.

- Practically speaking, Workday will provide all of our employees a best-in-class digital experience with a simple, connected and easy-to-use self-service platform:
  - to access and update their own information
  - to seize internal mobility opportunities
  - to seek help and general HR support
- Workday reaches all permanent employees, fixed-term contracts as well as contingent workers.

#### Stations refurbishment

- Our Group devotes a specific attention to the improvement of working conditions when a station refurbishment is planned.
- Each time a refurbishment is carried out, the station's design takes into account criteria relating to workstation ergonomics and well-being at work, in collaboration with Marketing (up to and including PRM constraints). This is done in consultation with the station staff.



### 3.1.3/3 – Policies and actions related to diversity and inclusion

#### Group Diversity, Inclusion, Equity and Belonging Policy

In 2024, Group Chief Human Resources Officer mandated our Group People and Culture Transformation Director in the writing of a Group Diversity, Equity, Inclusion and Belonging Policy, in order to reinforce the existing practices and ensure alignment with the company's overall vision and values. This policy will be reviewed by the Management Board for publication over the course of 2025.

This policy outlines Europcar Mobility Group's commitment to Diversity, Equity, Inclusion, & Belonging (DEIB) and emphasizes the importance of diversity as a key driver of performance and success for the company. It prohibits discrimination and aims to provide equal opportunities in all aspects of employment and to create a respectful and inclusive workplace where all employees feel valued.

The policy includes:

- Commitments of the Group in terms of DEIB, with a specific focus on non-discrimination and equal opportunity
- Key definitions: diversity, equity, inclusion and belonging, discrimination, harassment, retaliation
- Responsibilities towards DEIB (management, employees)
- How the Group implement its DEIB commitments at different stages of the employees' journey: recruitment and hiring, performance

management, compensation and benefits, talent development, workplace conduct

- Channels to report DEIB issues and remediate
- How we evaluate DEIB initiatives

Scope of application: the Groupe aims at deploying its DEIB policy to a limited scope in a pilot phase, then to all Europcar Mobility Group employees, regardless of geography, location or position/job. It will also apply to all job applicants.

#### Actions related to diversity and inclusion

##### Preventing discrimination / harassment

Everywhere it operates, Europcar Mobility Group complies with local laws and regulations to fight discrimination and prevent any form of harassment or intimidation.

In addition to the Group Code of Conduct and the upcoming Group DEIB Policy, most of the Group's corporate countries also have formal internal non-discrimination policies, and implement appropriate action plans.

Most of the time, the action plans in countries (e.g.: USA, UK, Spain, Australia, and New-Zealand) rely on dedicated and mandatory training modules: "Preventing Discrimination, Harassment and Bullying", "Equality & Diversity e-learning course"...

Lastly, at Group level, an anti-harassment referent was appointed at the end of 2019 to handle harassment-related issues.

### Promoting diversity and inclusion

Over the past years, diversity efforts have been focused on the feminisation in management bodies. To this purpose, a specific diversity training (highlighting the potential negative influence of unconscious bias) was rolled out, targeting managers and relying on 5 modules:

- introduction to diversity, inclusion and equity;
- first steps toward a diverse, inclusive and equitable workplace;
- combating unconscious bias in the workplace;
- understanding gender bias;
- bridging the gender gap as a manager.

Although gender balance is a strong focus for EMG, our diversity efforts are not limited to gender and we are particularly proud of the number of nationalities represented in our Group. To further encourage diversity, we highlight our commitments in the recruitment and hiring process, with a systematic mention on job boards of EMG's commitment on diversity and inclusion.

In some countries, we also activate partnerships with recruitment agencies specialised in Diversity and Inclusion (e.g. - Mozaic RH in France, for Group HQs and France subsidiary).

In addition, some countries developed initiatives to foster a culture of diversity and inclusion among their workforce. For example, our UK subsidiary has developed an Awareness Calendar which highlights cultural, social and historical events of importance to various communities, helping employees to

understand the different cultural backgrounds represented within the workforce. The programme also provides educational materials, articles and activities to deepen understanding and celebrate diversity with colleagues.

#### WeMob: EMG's diversity network

- Europcar Mobility Group's diversity and inclusion network (WeMob for "We are Mobilized for diversity and inclusion") was created in April 2019.
- Its main purpose is to increase awareness on gender issues among the Group's employees, empower women, and to a broader extent foster diversity and inclusion.
- WeMob deploys a number of initiatives in the Group's corporate countries (eg: conferences, networking events...), including a mentoring program specifically designed for people who need a guiding hand in their work life to gain confidence and dare more. In the framework of this program, all Mentors are volunteers, at Senior Management level.
- In 2024, 57 mentors help 59 mentees across countries, with their personal development: help them identify their strengths, recognize their successes, encourage them to be more proactive in building better work relationships, to network and communicate more, and go beyond their comfort zone.



3.1.4 – Own workforce metrics

All figures presented below relate to EMG's own workforce including Euromobil, unless otherwise specified.

● **Headcount at December 31st, 2024**  
*Permanent and non-permanent employees*

	2024
Total EMG	9.330

● **Types of employees at December 31st, 2024**

	2024
Number of permanent employees	8,920
Number of non-permanent employees	410
Number of seasonal workers	5,237
Number of interns and apprentices	217
Number of part-time workers <i>(permanent employees only)</i>	985
Number of full-time workers <i>(permanent employees only)</i>	7,935

● **Gender balance at December 31st, 2024**

	2024
Share of women in the permanent and non-permanent employees	42%
Share of women in the senior management teams (both country and HQ levels)	26%

● **Turnover**  
*Permanent and non-permanent employees*

	2024
Number of hires	2,977
Number of departures	3,036
Departures at employee's initiative	1,441
Departure at employer's initiative	1,085
Departure for other causes	510
Turnover	15%

● **Social dialogue**

	2024
Share of employees covered by collective agreements	74%
Share of employees covered by workers representatives	68%

● **Age distribution of the workforce**  
*On permanent employees only*

	2024
Employees under 30 years old	1,595
Employees between 30 and 50 years old	4,923
Employees over 50 years old	2,402

● **Disability**

	2024
Number of employees with a disability	141

● **Remuneration metrics**

	2024
Total wages and bonuses	439.20m€

● **Health and Safety**

	2024
Number of fatalities from work accidents or work-related ill health	1
Number of work accidents	240
Frequency rate of work accidents (TRIR)	14.9
Lost Worday rate	0.30
Number of days lost due to work accidents	4,920





## 3.2 Workers in the value chain (ESRS S2)

The following pages cover the subsequent material sustainability matters for EMG:

- Working conditions, diversity and inclusion in the value chain (at fleet and non-fleet suppliers) > ESRS S2
- Working conditions, diversity and inclusion at franchisees > ESRS S2

### 3.2.1 – Strategy related to workers at suppliers

Each year, EMG procures a large number of vehicles from car manufacturers (fleet suppliers), a sector which has experienced social controversy in recent years, particularly in Asian countries. Although the Group has no direct contact with employees of car manufacturers (other than sales staff), it is clear that employees of Fleet suppliers expect our Group to be vigilant about how their employer manages its workforce.

Similar expectations exist from workers at Non-Fleet suppliers. In so far as some of them operate a service for the Group under the brand name (eg - call centers, IT services...) on a long-term basis and/or are closely linked to our daily operations, they can feel as if they were part of the Group and can expect from us to be very vigilant on their employment conditions.

As a reminder: EMG is submitted to the duty of care. In this context, EMG is required to establish and publish a vigilance / duty of care plan. This plan covers the Group's own operations, as well as the entirety of its value chain, thus encompassing subcontractors, suppliers and franchisees.

Find out more about our vigilance / duty of care plan on our corporate website: <https://europcar-mobility-group.com/compliance/documents/667037bcb0ce a925108452.pdf>

EMG's vigilance / duty of care plan includes the sustainable procurement approach described in the following pages.

#### EMG sustainable procurement approach

Our Group has different tools to identify social risks at suppliers and assess them on the basis of social criteria:

##### IQ Plus tool

- Europcar Mobility Group aims at identifying suppliers with the highest levels of labour and human rights risk. For that, the Group uses IQ Plus to segment its supply chain according to the social risks in each sector of activity. This risk mapping by category has enabled EMG to prioritise the CSR/ESG assessments to be conducted for suppliers belonging to the segments most exposed to these risks.
- The purchasing categories with high social risks are car wash stations, repair and maintenance services, vehicle moving services, call centres, confectionery and uniform suppliers.

- More generally, the risks of discrimination, lack of fair pay, failure to comply with health and safety requirements and restrictions on the right to join a trade union can be detected in other sectors of activity thanks to IQ Plus.

#### EcoVadis assessment tools

- Europcar Mobility Group uses the EcoVadis database as a third-party assessment system, to enable verification and measurement of the impact of actions implemented by its suppliers on employee working conditions, well-being and overall, take into account the social performance of its suppliers.
- The Group works with two distinct tools for the ESG assessment that applies to suppliers identified as high or medium risk.
  - Firstly, the **Ratings** module provides a questionnaire adapted to the size and sector of the company, based on four themes: environment, labour and human rights (including working conditions, health and safety), ethics, sustainable procurement.
    - The methodology is broken down into policies, measures, actions, reporting and results, enabling the experts to produce a scorecard.
    - This tool also allows the Group to identify suppliers with at least one relevant controversy or incident identified by the sustainability analysts during the EcoVadis Ratings assessment as part of the 360° Watch monitoring.

- In addition, in order to involve and raise the awareness of low-priority or small suppliers (due to the volume of purchases made with them or their organisational structure), the Group uses a second module with a lighter questionnaire: Vitals.

These tools are currently deployed on the Non-Fleet and Fleet procurement perimeters.

- As far as Fleet Procurement is concerned:
- The Ratings module is currently deployed for car manufacturers and leasers, which have been identified as high and medium risk.
- Vitals will be used for dealers and local brokers, identified as small suppliers.

#### Channels for employees at suppliers to raise concerns and remediation processes

Any worker, including workers at suppliers, wanting to raise a concern related to ethics and compliance can use the **Ethical Alert Line; Group's whistleblowing mechanism**.

<https://europcar.whispli.com/lp/ethics>

For more details – see *Own Workforce / channels for employees to raise concerns* - page 44

Through an internal process, the Compliance team forwards relevant enquiries received via the Ethical Alert Line to the Procurement departments (Fleet and Non-Fleet). This approach guarantees that concerns are handled by the appropriate team in a defined lead time.



All reports raised through the Ethical Alert Line are promptly assessed and, as needed, further investigated. If the conclusion of the investigation confirms actions incompatible with EMGs standards:

- An action plan will be asked to the supplier, including corrective measures. These actions may include adjustments to practices or procedures within the supplier, depending on the nature of the problem. Indeed, it should be noted that the remediation process depends on the nature of the event, whether it is an individual accident or an incident affecting an entire group.
- If the situation involves serious acts such as undeclared work or any other proven critical offence, more drastic measures may be envisaged. In this case, it could be deemed a breach of contract and therefore could lead to the termination of the contract with the supplier.

### 3.2.2 – Policies and procedures related to working conditions and diversity & inclusion at suppliers

#### Group Code of Conduct

The Group Code of Conduct sets out its requirements and commitments in the areas of human rights, social rights, ethics and compliance. Reference is made to an existing whistleblowing mechanism available to EMG employees as well as suppliers & subcontractors workers.

The Group Code of Conduct is attached through a dedicated link to the signed supplier contracts to ensure that they will adhere to before the start of the contractual relationship.

*For more information: please consult our Group' Code of Conduct available on our corporate website. <https://europcar-mobility-group.com/compliance/documents/6697a476127b6941717140.pdf>*

#### Group's Sustainable Procurement policy (Fleet and Non-Fleet Procurement)

- The Group's Sustainable Procurement policy is a strategic approach adopted by Europcar Mobility Group which aims to integrate environmental, social and ethical criteria to guide purchasing decisions.
- The Group's Sustainable Procurement policy sets out 7 commitments and guiding principles, including compliance with European regulations and a review of our suppliers' performance on issues such as the fight against forced labor and respect for human rights.
  - One of the commitments is to purchase "products and services that respect local and international regulations, human rights and dignity, health and safety of people".
- Implementation/deployment: management commitment is essential, and integrating the policy into our purchasing processes is a key step in professionalizing our procurement teams. The policy is thus supported by the Non-Fleet Procurement department, to ensure that the teams concerned are aware of and trained in the integration of social criteria in procurement.
- Monitoring: to reinforce transparency and traceability, Europcar Mobility Group monitors and ensures that suppliers' practices comply with European social standards through third-party assessments.

#### Sustainable Procurement & Supplier Relations Charter (Non-Fleet Procurement)

- In 2024, Europcar Mobility Group signed the Charter for Sustainable Purchasing and Supplier Relations. To this end, the Group received the support of the Médiateur des Entreprises (part of the French Ministry of the Economy and Finance) and the Conseil National des Achats.
- The Charter encourages companies to adopt responsible practices towards their suppliers. It provides a framework for situations of critical imbalance between buyers and suppliers (unbalanced contractual clauses, abrupt termination of commercial relations, late payment).
- This voluntary initiative reinforces existing policies and practices and reaffirms the Group's determination to make progress with its purchasing teams and suppliers. The Charter's 10 commitments reflect the desire to build balanced relationships with suppliers and involve them in sustainable development efforts across all dimensions: economic, social, community and environmental.
  - The commitments related to social responsibilities and workers in the value chain are: "Give consideration to environmental and social responsibility issues" and "Conduct overall management of supplier relations through the procurement function."

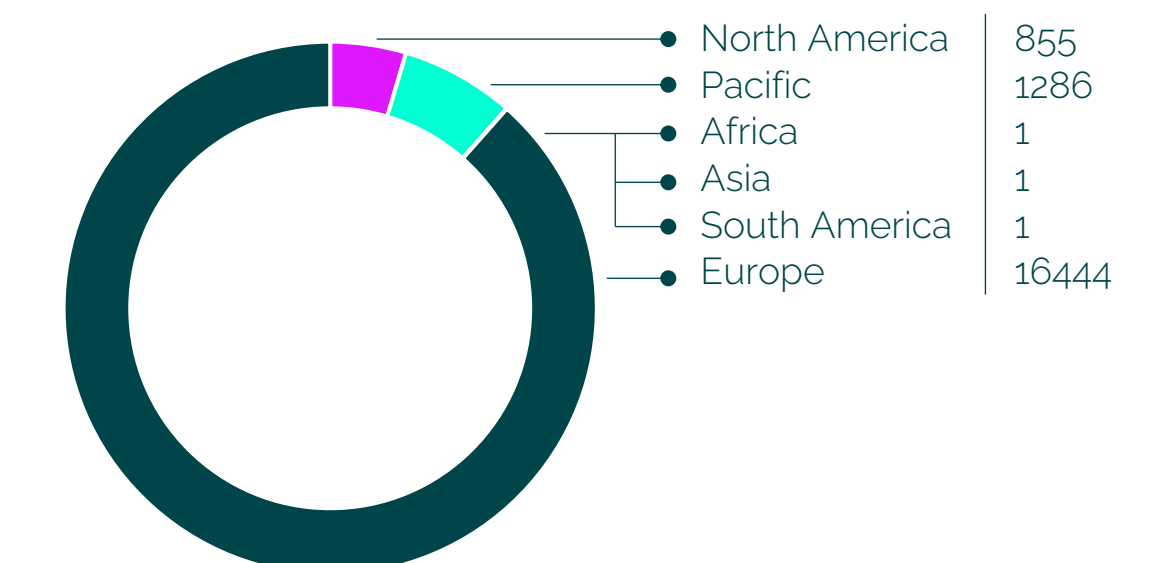
#### Sourcing strategy: preference for local sourcing (Non-Fleet Procurement)

Selecting local suppliers is part of the Group's sourcing strategy: from an economic and social point of view, prioritizing short-circuit supply chains allows the Group to create value with our local stakeholders, and from an environmental point of view, to contribute to reducing transport-related GHG emissions.

As a consequence, the vast bulk of the Group's non-fleet purchases (99.8% of its suppliers) is made in the geographical regions where the Group operates with its own subsidiaries, making it a major provider of local employment.

Near to zero purchases are made outside the Group's corporate countries: indeed Africa, South America and Asia are accounting for 0.02% of the non-fleet purchases, thereby limiting the potential social risks associated with those regions.

#### Number of Direct Suppliers per Geographical Zone *Figures excluding Euromobil*



*Nb - The Group is present in the Pacific region with its Australia-New Zealand subsidiary and in North America with its US subsidiary*



### Sourcing strategy: suppliers geographical distribution for Fleet Procurement

Vehicle purchases are done for the vast majority through car manufacturers (i.e. OEMs = Original Equipment Manufacturers), which have branches (National Sales companies or importers) in countries where EMG operates with its subsidiaries. Considering the origin of the suppliers more than 88% vehicles are from Europe, less than 9% are from Asia and 3 % from North America (all figures excluding Euromobil). Nevertheless, we have to take into account that OEMs factories are located in different countries of Europe and in other continents, and OEM production sites are dedicated to brands or / and car models. In order to have a comprehensive view of workers in the value chain, EMG is working on a mapping exercise to identify where vehicles are produced by OEMs (factory location), going beyond the origin of the OEM.

### 3.2.3 – Actions related to working conditions and diversity & inclusion at suppliers

Actions related to working conditions and D&I assessment at suppliers focused in 2024 on the appropriation of our existing tools, namely the use of the IQ Plus and EcoVadis databases, and the professionalisation of our internal buyer community.

#### Actions on the Non-Fleet Procurement perimeter

- **Recruitment of a Sustainable Procurement Referent:** reflecting EMG's determination to professionalize its responsible sourcing approach.
- **Buyers training:** benefits and challenges of sustainable procurement, with a focus on social issues associated with specific purchasing categories.

- **Sustainable Procurement guide:** provided to buyers to help them integrate best practices into their day-to-day procurement activities.
- **Sponsor Letter** from the Group Purchasing Director to emphasize the Sustainable Procurement commitment of EMG; sent to the suppliers invited under the EcoVadis assessment process.

#### Actions on the Fleet Procurement perimeter

In 2024, the objective was to raise awareness and involve the Fleet Procurement team to steer sustainable procurement.

A Sponsor Letter from the Group Purchasing Director to emphasize the Sustainable Procurement commitment of EMG was sent to the suppliers invited under the EcoVadis assessment process.

### 3.2.4 – Metrics related to working conditions and diversity & inclusion at suppliers

#### On the Non-Fleet Procurement perimeter

- At the beginning of 2024, Europcar Mobility Group began a programme of assessment campaigns to evaluate suppliers on their CSR performance, under the supervision of the Sustainable Procurement Referent.
- The first challenge was to prioritise the work, particularly for countries with the largest number of suppliers to involve and raise awareness.
- The KPI chosen by the Group is the proportion of "risky" suppliers (strategic and critical) whose CSR performance has been assessed, in the 9 perimeters where the Group has dedicated Procurement teams (central and local levels).

- This KPI is monitored on the basis of the volume of suppliers concerned, and not on the basis of the expenditure they represent, in order to maintain high

On 31 December 2024, 13.3% of the legal entities with which Europcar had contracted and worked, considered to be "risky" (either strategic or critical), were covered by an assessment of their CSR performance, using EcoVadis tools.

#### On the Fleet Procurement perimeter

On 31 December 2024, 36.4% of the Fleet Purchasing suppliers, with which EMG had contracted and worked, considered to be "risky" (either strategic or critical), were covered by an assessment of their CSR performance, using EcoVadis tools.

### 3.2.5 – Strategy related to workers at franchisees

Europcar Mobility Group accelerated its international development in the 2000s thanks to the franchise model and has since then continuously increased its global presence. EMG's franchise model is based on shared practices and the supply of a dedicated support from the Group to the franchisees, but also on shared values and a strict compliance of the franchisees to the Group's business standards and ethics.

In that perspective, the Group considers that workers at franchisees are among its first ambassadors, and deserves the vigilance of the Group, especially on working conditions and diversity and inclusion. On the other hand, and as they represent the Group's brands, workers at franchisees expect the Group to be vigilant on how their employer manages its workforce.

As a reminder: EMG is submitted to the duty of care. In this context, EMG is required to establish and publish a duty of care plan. This plan covers the Group's own operations, as well as the entirety of its value chain, thus encompassing subcontractors, suppliers and franchisees.

*Find out more about our vigilance / duty of care plan on our corporate website: <https://europcar-mobility-group.com/compliance/documents/667037bcboce a925108452.pdf>*

EMG's vigilance / duty of care plan includes the processes for engaging with workers of franchisees described in the following pages.

#### Processes for engaging with workers of franchisees

#### IPD (International Partner Development) organisation (in countries where EMG does not have directly owned operations)

- Regional Directors regularly visit franchisees to conduct Country Business and Development Review meetings. Larger franchisees are visited at least once a year and smaller franchisees at least every 2-3 years.



- The visits, which are business oriented, are also an opportunity for the Regional Directors to have direct access to employees and take the pulse of internal morale.

#### Franchisees in corporate countries

- The Franchise Director and his dedicated team carry out on a regular basis on field visits.
- During these visits, they liaise with the franchisees' staff to manage various operational issues. The relationship is fluid and regular, with the Franchise Director being clearly identified as the point of contact. If necessary, the Franchise Director can also have direct contact with the franchisee's staff to check internal morale.

#### Channels for employees at franchisees to raise concerns and remediation process

In the event of any negative impact on the workforce of our franchisees, either a group of workers or an individual worker, EMG has provided the same channel as for our employees to enable workers at franchisees - to raise concerns.

Any worker, including workers at franchisees, wanting to raise a concern related to ethics and compliance can use the **Ethical Alert Line; Group's whistleblowing mechanism**.

<https://europcar.whispli.com/lp/ethics>

*For more details – see Own Workforce / channels for employees to raise concerns - page 43*

Through an internal process, the Compliance team forwards relevant enquiries received via the Ethical Alert Line to the IPD department or the Franchise Directors concerned. This approach guarantees that concerns are handled by the appropriate team in a defined lead time.

All reports raised through the Ethical Alert Line are promptly assessed and, as needed, further investigated. If the conclusion of the investigation confirms actions incompatible with EMGs standards, it could be deemed a breach of contract and therefore could lead to the termination of the franchise agreement.

### 3.2.6 – Policies and procedures related to the monitoring of working conditions and diversity & inclusion at franchisees

EMG central teams who manage the relationship with franchisees have a number of policies and procedures in order to select the future franchisee, formalize the contractual relationship with the future franchisee and ensure its appropriate onboarding when the contractual relationship is established. The franchisee's social responsibility is part of the contractual relationship with EMG. All the procedures described below apply to all EMG franchisees under franchise agreement, with no exception.

#### Franchisee due diligence

Prior to any signing of an International Franchise Agreement, EMG central teams conduct a comprehensive due diligence process on the prospective franchisee. This due diligence includes an assessment of the applicant on: sanctions, embargoes and corruption. In addition the Franchise / Regional Director will check and evaluate the prospects' existing business operations which may include visits to stations and offices as well as meeting the local teams.

#### Franchise Agreement

First of all, the franchise agreement includes a compliance clause that requires franchisees to comply with the **Group Code of Conduct**, particularly in terms of respect for the environment, employee health and safety and respect for human rights. In addition, relevant clauses highlight the franchisee partner's responsibilities towards compliance **with labor laws**. Finally, throughout the relationship with the franchisee, EMG central teams provide support that is conditional on compliance with the law (notably labor law) and with the Group's Code of Conduct. Failure to comply could result in the **termination of the franchise agreement** between the Group and its franchisee partner.

#### Audit

The franchisees are audited during the contractual relationship. These audits are carried out by the Group Internal Audit department. External auditors are assisting and performing the audit mission on the field. Franchise / Regional Directors are coordinating the mission and reviewing the decisions of the audit. Audits are conducted in franchise entities to ensure from EMG point of view that all franchisees are compliant with the franchise agreement contract signed and the EMG rules and procedures / guidelines. These audits can allow detection of discrepancies, breaches and/or social issues. Results of the audits are reported to the Group CFO.

### 3.2.7 – Actions related to the monitoring of working conditions and diversity & inclusion at franchisees

In addition to the site visits and Country Business & Development Reviews conducted by the Regional Directors, the IPD team has developed various channels and activities to raise franchisees' awareness of the Group's standards and expectations, particularly in the areas of compliance and CSR, and to ensure that they know how to embed these in their operations.

This has been performed over the past years via:

- Introduction weeks (for new franchisees).
- Regional Franchise Meetings.
- Franchise Global Conference.
- Dedicated Regional Training Events.
- Dedicated training modules, designed at working on weaknesses highlighted during audits.

In 2024, the IPD team launched an initiative to survey franchisees on working conditions and diversity & inclusion. The questionnaire covered many aspects such as the existence of a sustainability policy at franchisees and/or a D&I policy / a working conditions policy at franchisees, with measures to prevent discrimination, harassment and programmes to develop D&I. This survey, which provided both quantitative and qualitative results, will help inform further actions and developments to assess franchisees on social issues, particularly working conditions and D&I.

Similar activities are performed by the central EMG teams towards domestic franchisees.



## 3.3 Consumers and end users (ESRS S4)

The following pages cover the subsequent material sustainability matters for EMG:

- **Customers Health and Safety > ESRS S4**
- **Transparent information in the customer relationship > ESRS S4**

### 3.3.1 – Characteristics of consumers and end users of EMG

Europcar Mobility Group is a "by people for people" company: this means that customer service is part of the Group's DNA and that the company strives to be customer-centric in each and every process. We serve a wide range of customers on a daily basis. We consider different needs and expectations, especially in terms of information transparency, depending on the use case:

- **BtoC customers:** they directly rent from our company and are most of the time also the end users. They travel for various reasons, implying differentiated expectations in terms of information transparency. Mainly:
  - **Leisure:** individuals or families renting vehicles for vacations or personal use. These customers may be less familiar with the rental experience and what they will have to do before pick up, during rental, on return. They could also be unfamiliar with terms and conditions, insurance packages as well as vehicle handling, increasing the risk of misunderstanding.

- **Business:** professionals renting vehicles for work purposes, who often drive in unfamiliar locations and under time constraints, which can reduce their attention span and thus the risk of misunderstanding.

- **BtoB customers:** they rent vehicles from our company for their employees, to equip their employees with company cars or directly operate their business (eg - delivery). These customers have specific needs in terms of information, for instance information related to invoicing, terms of conditions, flexibility of the solutions we provide them with, but also information for the end users of the vehicles.

- **BtoBtoC customers:** BtoBtoC customers travel mainly for leisure. They rent from our company using an indirect channel (broker) and deserve a specific attention as they need to understand the difference between direct / indirect channel, and more specifically, the insurance coverage that they can benefit from the broker and from the rental company, as well as the terms of the conditions of the company even though they have rented via an indirect channel.

Each customer group also presents unique health and safety considerations, necessitating tailored risk management strategies to address specific needs and circumstances. As an illustration:

- **Leisure Travelers:** these customers may be less familiar with vehicle handling and local driving regulations, increasing their risk of accidents or misuse of vehicles.

**Business Travelers:** professionals renting vehicles for work purposes, who often drive in unfamiliar locations and under time constraints. This can elevate the risk of accidents due to rushed driving or fatigue.

*Find out more about EMG customers:  
- On page 14 - "Interests and views of stakeholders"*

### 3.3.2 – Strategy related to consumers and end users

#### Steering customer-centricity at central level

To ensure a customer-centric approach and effectively address customer needs, EMG has a dedicated organization in place.

Two dedicated departments within the Marketing and Customer organization ensure coverage of customer's needs and engage with customers:

- **Customer Care:** this department provides direct support to customers, answering enquiries, resolving issues and ensuring a positive customer experience throughout their remote interactions with the company.
- **Customer and Market Intelligence:** this department focuses on understanding customer needs, preferences and behaviors to drive improvements in our products, services and overall customer experience. It comprises three specialized teams: Customer Satisfaction, Customer Market Insight, Customer Loyalty.

In addition, **Customer Health & Safety** matters have been placed under the supervision of the Chief Fleet and Operating Officer and the Group Director Operations.

A cross-functional steering committee called **"Voice of customers" (VOC)**, gathering these different departments, meets monthly to discuss customer satisfaction performance, identify pain points and review ongoing actions to meet customer expectations.

#### Processes for engaging with customers

EMG has a comprehensive process for engaging with customers, which enables detection of any issue they may face during their rental experience. This proactive approach helps us not only address potential problems but also understand what aspects of our service are truly valued by our customers.

This process involves the Customer and Market Intelligence department as well as the Customer Care department, and includes multiple channels for proactively gathering feedback, analysing insights and ensuring that it is shared with the whole organization in order to drive continuous improvements.



Type of engagement	Moment in the customer journey / stage of engagement	Frequency	Purpose
Net Promoter Score (NPS): for short-term rentals	<ul style="list-style-type: none"><li>Survey sent after the rental ends, to evaluate the overall experience</li></ul>	<ul style="list-style-type: none"><li>1 or 2 days after the rental, for each rental</li></ul>	Measure the likelihood of customers recommending our services to others, provide a quantifiable and reliable metric for overall customer satisfaction and loyalty.
Customer satisfaction survey (CSAT): for long-term rentals	<ul style="list-style-type: none"><li>Initial survey sent at the beginning of the rental to assess the pick-up experience and address any immediate issues</li><li>Follow-up surveys to gauge the ongoing satisfaction →At the beginning of the rental, for each rental</li></ul>	<ul style="list-style-type: none"><li>At the beginning of the rental, for each rental</li><li>Every 3 months</li></ul>	Evaluate specific aspects of the customer experience, enable the identification of areas for improvement and take proactive measures
Customer Care surveys (CCS)	<ul style="list-style-type: none"><li>Survey sent after each interaction with the Customer Care team regardless of whether it occurs,</li></ul>	<ul style="list-style-type: none"><li>Before, during or after the rental</li></ul>	To assess the quality of customer care interactions and identify areas we can enhance our support and our communication
Verbatim feedback	<ul style="list-style-type: none"><li>Embedded in satisfaction surveys</li></ul>	Similar to surveys (NPS, CSAT, CCS...)	The automated text and sentiment analysis of each customer's comment provides in real time a precise mapping of the strengths and weaknesses of the journey in a specific station, country or brand
Google ratings and reviews	Customers may choose to leave a review on the station's Google page	Up to customers' will (usually after the rental), with more and more proactive solicitation at the desk during the pickup	Measuring and improving our branches' e-reputation is becoming a necessity, as customers take online reviews in consideration before choosing a business

Channels for consumers ans end users to raise concerns and remediation process

In addition to the channels described above (for the collection and analysis of feedback), EMG also offers its customers channels to escalate requests, complaints and raise concerns.

These channels involves:

- On the one hand, the Customer Care department.
- On the other hand, the Compliance team.

Channels owned by the Customer Care department and means to remediate / levers for remediation

The Customer Care department is responsible for providing direct support to customers, addressing enquiries and complaints, resolving issues and ensuring a positive customer experience throughout their remote interactions with the company.

- The Customer Care department is easily reachable thanks to a wide range of remote communication channels to cater to diverse customer preferences. This includes for instance, phone, email, social media and FAQ / self-service portals, with contact details made available on each of our booking websites.
- EMG is committed to providing accessible and inclusive remote customer care. This includes offering support in multiple languages and ensuring compatibility with assistive technologies.
- A strong focus is set on KPIs, on both quantitative and qualitative aspects. KPIs such as first response time, resolution time, and customer satisfaction scores are tracked and analyzed to measure the efficiency and effectiveness of our Customer Care.

We also continuously analyze channel usage data, so as to optimize resources and ensure efficient customer care delivery.

Channels owned by the Compliance department and means to remediate / levers for remediation

EMG has implemented various channels that allow consumers and end users to voice their concerns about data privacy, compliance, ethical matters or any other concerns.

- The Data Protection Officer (DPO) Mailbox serves as a dedicated channel where stakeholders, including consumers and end users, can raise questions or report concerns related to their personal data. It ensures that consumers and end users can exercise their data protection rights – such as access, rectification, erasure and restriction of processing – in line with regulatory requirements.
- In addition, customers can use EMG's Ethical Alert Line, which allows all stakeholders, including consumers and end users, to report any compliance or ethical issues that may affect them. <https://europcar.whispli.com/lp/ethics>

For more details – see Own Workforce / channels for employees to raise concerns - page 43

Through an internal process, the Compliance team forwards relevant enquiries received via the Ethical Alert Line to the Customer Care department. This approach guarantees that concerns are handled by the appropriate team in a defined lead time.





### Marketing levers to remediate negative impacts on consumers and end users

To enhance the overall customer experience, EMG conducts in-depth root-cause analysis workshops, leveraging advanced semantic analysis of customer feedback. These workshops bring together cross-functional teams from Marketing, Sales, Operations, Legal and Customer Service to pinpoint the exact reasons behind customer dissatisfaction.

### 3.3.3 – Policies and procedures related to consumers' and end users' health and safety

Mitigating and reducing individual accidents and health and safety risks for our customers is an integral part of our business model. Not only because we place the protection and well-being of our customers at the heart of our concerns, but also because vehicle repair and maintenance is a key operational efficiency issue for us ; both being intertwined.

Customer health and safety matters are addressed by various procedures and programmes within our Group:

- Repair and maintenance procedures, within the Operations function, in all countries, which guide countries in implementing best repair / maintenance practices.
- Roadside assistance partnerships, to provide our customers with 24/7 roadside assistance and emergency support services
- Vehicle turnaround protocols, including:
  - Assessment of the vehicle conditions and

dashboard information between each rental to assure safety of the vehicle before the next rental and consider alternative vehicles to be given to customers if standards are not met,

- Cleaning protocols to ensure a clean and safe environment for all customers.
- Existence of a specific cleaning / sanitization protocol\* which can be activated in the event of health problems/epidemics reported by local or international health authorities.

- Stop-rent procedure and recall of defective vehicles, which can be activated in the event of manufacturing problems reported by the manufacturer.
- Connected Vehicles' programme\*\*, for analysing vehicle accident data.

\*In recent years, our Group has distinguished itself by being the first to sign a partnership agreement with Bureau Veritas, in order to establish a Safety Program to meet the challenges posed by the sanitary crisis linked to the Covid-19 pandemic. The aim of this programme was to implement the best standards and cleaning protocols in all our stations to ensure that our vehicles are not sources of the virus spreading between each rental.

\*\*Our Group has invested in recent years in an operational efficiency programme ("Connected Vehicles Program") aimed at connecting all the vehicles in its fleet, to get data linked to the vehicle and its driving - in accordance with data protection regulations. Thanks to this built-in connectivity, we gain real-time control on our fleet, are able to manage optimization of operational processes such as fuel management, vehicles allocation, as well as

vehicles safety and security monitoring, but also a better analysis of post-accidents.

Building on these existing procedures and programmes, the Group aims at taking a significant step forward in 2025 by establishing a Group Consumer and End-user Health and Safety policy that will gather, align, formalize and expand the best practices already in place.

### 3.3.4 – Policies and actions for information transparency in the customer relationship

We are committed to providing transparent information, regardless of rental duration, vehicle type or customer profile. We recognise that every customer interaction carries a potential risk of misunderstanding and inconvenience due to a lack of information.

That's why:

- we prioritise open communication and transparency by providing detailed explanations of our services and processes to ensure customer understanding and manage expectations,
- at the same time, we ensure that our employees understand and integrate this requirement for information and transparency on a daily basis through training, front-line management mobilisation and awareness-raising initiatives.



Steering customer-centricity at central level

Policy/Process Name	Content Summary
Group Code of Conduct	Emphasizes transparency with all stakeholders, particularly customers. Highlights commitments to clear, honest, and transparent service, requiring employees to fully understand services and commercial conditions to ensure accurate customer communication regarding rentals and ancillary products/services. Mandates distribution and training on the Code of Conduct.
Contractual documents	Detailed breakdowns of rental costs, including base rates, taxes, fees, and optional extras, are clearly presented to customers at the time of booking, in their rental agreement and invoice.
Insurance Options	We offer a variety of insurance coverage options to suit different customer needs and budgets. Explanations of each option, including coverage details, exclusions, and associated costs, are provided both online and at the rental counter. We also encourage customers to ask questions and seek clarification to ensure they understand the insurance coverage they are selecting.
Fuel Policies	Our fuel policies are clearly outlined in our rental agreement and on our website. We offer different fuel options, such as prepaid fuel or returning the vehicle with a full tank. Customers are informed of the chosen fuel option at the time of booking and are provided with instructions on how to refuel the vehicle if necessary.
Damage Policies	Our damage policies, including procedures for reporting damage, liability for repairs, and excess charges, are clearly explained in our rental agreement and on our website. We provide customers with information on how to document any damage that occurs during the rental and the steps involved in the claims process.
Vehicle Inspection	A thorough inspection of the vehicle's condition is conducted at the start and end of each rental. Any existing damage is documented and shared with the customer to avoid disputes. We also provide customers with the opportunity to purchase additional damage waivers for added peace of mind.

Actions contributing to transparent information in the customer relationship

Initiative	Description
Customer Experience Days (CX Days)	Strengthens customer-centric culture through branch immersions, webinars, workshops, customer service listening sessions.
Local NPS Champions	Dedicated advocates for customer satisfaction in each country, responsible for steering customer journey, reporting performance, and acting as point of contact for customer satisfaction matters.
Accuracy Checks (Terms & Conditions, FAQs)	Rigorous review of customer-facing content (rental agreements, invoices, website content, promotional materials) to ensure accuracy and up-to-date information. Includes simplifying complex information, explaining technical terms, and legal review. Proactive enhancement of FAQs based on customer feedback.
Social Media Monitoring	Monitors online conversations to identify and manage misinformation risks. Utilizes advanced social listening tools (currently Ipsos Synthesio / before Radarly).
Continuous Improvement Process (Customer Feedback, Online Reviews)	Regular review of customer feedback from various channels, monitoring online reviews (Google, Trustpilot, and social media), and implementing changes based on insights gathered.
Goldcar Customer Satisfaction Improvement Program	Implemented post-acquisition to align Goldcar's information and service with EMG standards. Focuses on enhancing processes and practices based on NPS surveys, with emphasis on sales agents. The primary goal was to improve Goldcar's customer satisfaction, with a special focus on enhancing information transparency.



### 3.3.5 – Consumers and end users metrics

We actively track trust-related metrics like customer loyalty, repeat business rates, Net Promoter Score (NPS), and feedback on trust through surveys and online reviews.

These metrics are considered as relevant to monitor overall satisfaction and more specifically, satisfaction towards information transparency as well as safety.

We pay particular attention to feedback related to:

- **Honesty and Fairness:** we regularly analyze customer feedback (NPS surveys, CSAT surveys) and online reviews to ensure that our practices are perceived as fair and transparent. We address any concerns promptly and make necessary adjustments to our policies or procedures to ensure customer satisfaction.
- **Customer Care:** we measure customer satisfaction with our service through various channels, including post-rental surveys and online reviews. We use this feedback to identify areas for improvement in our customer care interactions and responsiveness to concerns.
- **Vehicle Cleanliness and Maintenance:** we monitor customer feedback regarding the condition and reliability of our rental vehicles. We have implemented rigorous maintenance procedures to ensure that our vehicles are well-maintained and safe to drive. We also encourage customers to report any issues they encounter during their rental so that we can address them promptly.

#### 2024 NPS performance

- EMG's combined NPS for all brands in 2024 was 51.4, exceeding the annual target of 50.6.
- The Europcar brand reached its target, achieving an NPS of 58.1 compared to the set goal of 57.3.

#### 2024 Google ratings performance

- Monthly performance tracking using the Skeepers feedback management platform reveals that Europcar maintained a stable Google score within the 4 to 4.2 range throughout 2024.
- Goldcar also demonstrated a positive performance, achieving a Google score of 3.9 for the year.

NB - Google My Business (GMB) rating system operates on a scale of 1 to 5, where 5 represents the highest level of customer satisfaction.

In addition to these metrics, it should be noted that EMG did not receive any reports of severe human rights issues relating to consumers and end-users over the course of 2024.





4

# GOVERNANCE INFORMATION

- 4.1 Business ethics and data protection
- 4.2 Relationships with franchisees and suppliers





# Business Conduct (ESRS G1)

The following pages cover the subsequent material sustainability matters for EMG:

- **Business ethics (incl. prevention of corruption and bribery)**  
    > **ESRS G1**
- **Data protection**  
    > **ESRS G1**
- **Responsible relationship with suppliers**  
    > **ESRS G1**
- **Responsible relationship with franchisees**  
    > **ESRS G1**

## 4.1 Business Ethics and Data Protection

### 4.1.1 – Governance of Business Ethics and Data Protection

Europcar Mobility Group's governance of Business Ethics and Data Protection at Europcar Mobility Group around several key bodies (including management and supervisory bodies), each playing a distinct role in upholding ethical standards and ensuring compliance across the organization.

Supervisory Bodies / Management Bodies	BUSINESS ETHICS	DATA PROTECTION
Supervisory board	As representatives of the shareholders and employees, the Supervisory Board provides strategic oversight of the Group's business conduct, ensuring that ethical standards are consistently upheld. The board monitors the Group's risk management process, with particular attention to non-compliance risks associated with unethical business practices.	The Supervisory Board provides strategic oversight of EMG's data protection practices. Recognizing the critical role of data privacy in maintaining customer trust and protecting the Group's reputation, the Board monitors how data risks are managed across all operations.
Audit & Risk Committee	Operating under the Supervisory Board, of which it is an emanation, the Audit & Risk Committee reviews the status report of the Compliance Programme at least once a year. It is also responsible for deciding on targeted audits of the Compliance Programme to ensure ongoing vigilance and compliance with ethical practices.	The Audit & Risk Committee is updated on data protection actions and conducts annual reviews of the Data Protection Program. By overseeing targeted audits, the committee proactively identifies potential vulnerabilities in EMG's data protection program, to prevent disruptions that could impact our customers and the group's reputation.
Management Board / GEC	Both chaired by the CEO, these bodies are integral to embedding ethical standards in day-to-day business. By approving the annual Compliance Plan, they set the compliance priorities and objectives for the year, particularly in the area of business ethics, and ensure that these are reflected in both operational and strategic decision-making. The Management Board and the GEC play a hands-on role in the day-to-day implementation of the Group Compliance Programme, driving its integration throughout the organisation.	The Management Board plays an active role in data protection governance by reviewing an annual report from the Group DPO, which covers the Data Protection Compliance program status, upcoming initiatives, and risk evaluations. In cases of data breaches, the group DPO immediately informs the Management Board, allowing for timely responses to protect customer data.
Compliance Committee	Comprising senior executives from the GEC along with members of the Legal and Compliance Team, the Compliance Committee is tasked with guiding the effective implementation of compliance initiatives. The committee continuously evaluates how well ethical principles are incorporated into the Group's operations, reviews annual compliance reports, and provides guidance for enhancing the Group's ethical practices.	The Compliance Committee oversees the execution of EMG's Data Protection Compliance Program, among other compliance topics. The committee develops an annual roadmap to guide data protection improvements across the Group, focusing on transparency and strict adherence to regulatory standards. By proactively strengthening data protection practices, the Compliance Committee ensures that EMG's operations continuously uphold privacy and security standards, protecting both customer trust and the Group's reputation.
Compliance team	Led by the Group's Compliance Director, the Compliance Team ensures that the Group's ethical principles are effectively implemented across all regions and business units. This team is supported by Group Senior Compliance Officers and a network of Local Compliance Officers who collectively cover all corporate countries of Europcar Mobility Group. This structure allows the Compliance Team to effectively oversee ethical standards across diverse operational contexts, ensuring consistent application of compliance policies and practices.	Part of the Compliance team, the Group DPO leads EMG's data protection strategy, establishing group-wide policies that align with GDPR requirements and adapting them to meet regional needs. GDPR Champions and Local DPOs support this effort by implementing these policies locally, managing data protection registers, and handling data subject requests. This layered structure ensures that data protection measures are consistently applied, reducing the likelihood of data breaches or unauthorized access. Through these collaborative efforts, EMG minimizes risks to customer data, enhances response readiness, and maintains strong compliance with all applicable regulatory standards.



### 4.1.2 – Business Ethics: policies and actions

Europcar Mobility Group has established a comprehensive **Compliance Program** based on strong business ethics policies, ensuring ethical and responsible business conduct:

#### Group Code of Conduct

The new Code of Conduct, introduced in June 2024, consolidates previous policies and strengthens the company's commitment to integrity, accountability, and legal compliance.

*For more details, please refer to the Group's Code of Conduct available on our corporate website:*

<https://europcar-mobility-group.com/compliance/documents/6697a476127b6941717140.pdf>

It includes a zero-tolerance policy for violations and is mandatory for all employees through e-learning training.

#### > Training on the Group Code of Conduct

This e-learning is mandatory for all employees, regardless of their position or location, and must be completed within 30 days from their start date. It ensures a swift and consistent integration into compliance requirements while strengthening collective adherence to the Group's values.

This program applies to all, with specifics for different population groups:

- Station employees with limited client interaction (the training is designed to accommodate operational constraints, such as limited time availability and lack of systematic access to a computer).

- Station employees with high client interaction (comprehensive module, tailored for station employees).
- Headquarters employees, including executives (comprehensive module, tailored for HQ employees)

#### Business Ethics Policies

- Whistleblowing Policy: Provides a confidential platform for employees and stakeholders to report ethical concerns, with zero tolerance for retaliation.
- Investigation Policy: Ensures professional, impartial, and confidential handling of alerts.

#### Anti-Corruption & Bribery Compliance Framework

- Risk Mapping: Identifies and assesses corruption risks with input from key stakeholders.
- Whistleblowing System: Offers a secure channel for reporting misconduct, covering the following areas: Human resources (e.g., discrimination, harassment, mobbing); Health and safety; Data privacy; Consumer law; Environment; Competition law; Corruption and bribery; Conflict of interest; Human rights; Fraud; Embezzlement; Money Laundering / Terrorism Financing; Gifts and Entertainment; Third party due diligence; International sanctions, Tax, Export control; all other potential misconduct, such as theft, misuse of company assets etc.
- Third-Party Due Diligence: Evaluates external business partners for compliance risks.
- Training & Awareness programs:
  - Mandatory e-learning modules for all employees.
  - Onsite training for new hires and franchisees.
  - Third-Party Management Tool Training of all relevant personnel.
  - Compliance module for new franchisees.

- Disciplinary actions for violations, aligned with local laws.
- Continuous improvement through the Compliance Annual Plan to refine and improve compliance initiatives.
- Gifts & Invitations Policy regulating the acceptance and declaration of gifts.

#### Compliance achievements

It is worth noting that there has been no conviction of Europcar Mobility Group for bribery or corruption during the financial year 2024.

### 4.1.3 – Data Protection: policies and actions

To achieve the critical goal of protecting customer and employee data, preventing privacy intrusions, and complying with evolving regulatory requirements, EMG has developed a comprehensive **Data Protection Program** that emphasizes both compliance and proactive risk management of its subsidiaries.

#### Data Protection Policies & Procedures

- Data Protection Governance Policy: Defines the roles and responsibilities of the Group DPO, Local DPOs, and GDPR Champions to enhance regulatory compliance.
- Data Protection Risk Map: Identifies strengths and areas for improvement, allowing proactive risk management and prevention of data privacy incidents.
- Employee Data Protection Policy: Ensures responsible handling of employee data to protect workforce trust and compliance.

- Data Subject Rights Procedure: Standardizes the management of data subject requests to ensure regulatory compliance and reduce customer complaints.
- Privacy & Cookie Policies: Establish transparency on data handling, covering areas such as connected cars, public Wi-Fi, and user consent.
- GDPR Self-Assessment: Integrates privacy-by-design principles into projects to minimize future risks.
- Contract & Clause Templates: Establish standardized agreements to secure third-party data handling.

#### Customer Data Protection in Customer Care Operations

- Compliance with GDPR, PCI DSS, and other data regulations.
- Use of encryption, access controls, and security audits to protect remote data interactions.
- Data minimization ensures only necessary customer data is collected and stored.
- Customers have transparency and control over their data, with options to access, rectify, or delete personal information.

#### Data Protection Awareness & Training

To strengthen compliance and customer trust, EMG has launched initiatives to promote best practices and enhance employee awareness:



- DPO Network Monthly Meetings: Facilitate collaboration and knowledge-sharing among Group and Local DPOs.
- General Data Protection Training: An e-learning module for all employees, ensuring they understand their role in data protection.
- Targeted Training: Focused training for employees handling high-risk data, such as in PTO and Customer Service.
- Adequacy Project: Standardizes data processing activities across the Group to maintain consistent regulatory compliance and prevent data breaches.

Through these measures, Europcar Mobility Group proactively strengthens its Data Protection Compliance Program, mitigating risks and ensuring trust among customers and employees.

## 4.2 Relationships with franchisees and suppliers

Along with business ethics and data protection, we consider our relationships with our suppliers and franchisees to be one of the key pillars of our business conduct: we want to build a responsible relationship with them, i.e. one that is trustful, respectful, based on a clear expression of expectations, fruitful interactions and collaborative work, in order to develop our respective businesses together.

### 4.2.1 – Management of relationships with franchisees

Franchise partners EMG works with are established vehicle rental companies that have previously operated independently under their own brand, often with a regional or national presence (and in some cases limited to one or a few countries).

When they choose to become a Europcar or a Goldcar franchisee, the aim is for them to benefit from brands with international reach, mutualize services (eg – e-commerce) and thereby expand their customer base and grow their business.

For EMG, the partnership with franchisees is based on the shared objectives of providing a high quality of service to customers, increasing its footprint as well as sharing business success and upholding business ethics. In this framework, the key priorities for our central teams managing the relationship with franchisees are:

- the evaluation and support provided to franchise partners utilizing our brands, our services and know how, in order to help them develop our brands as well as their stations network,
- their compliance with local and international laws, as well as in line with the quality and business standards of the Group.

A number of processes ensure that these key priorities are reached:

#### Franchise new country openings or renewals

To commence an agreement (new or renewal), EMG central teams undertake the following steps:

- Signing of NDAs
- Due diligence forms

- Obtaining Partner's audited accounts
- In person meetings (organization review)
- Commercial negotiations (fee structure and network)
- Management Board approval of new partner of renewal
- Issuing Pre-Contract / Draft Agreement review
- Final version of the agreement / signing

#### Franchise set up

To open a franchise within our systems, EMG central teams notably undertake the following steps::

- Terms and conditions to be generated within the relevant systems
- In person and/or video call sessions to explain the set up procedures and provide knowledge to ensure competency with set up information

#### Franchise country / franchise partner process and training support

Training and support is a fundamental part of the franchisee agreement, which is on a continuous cycle of exposure, validated by access to fixed processes and procedures as well as by arranged interactions between EMG central teams and the franchisee.

- Documented "Know How – Operating Procedures" for physical reference points provided to the Franchise country
- Induction weeks
- 1:1 training sessions
- FAST or AGT reporting system training: to ensure revenues are properly declared so as to generate royalty invoices

#### Ongoing support and training

For our franchisees located in countries where we don't have subsidiaries: each franchisee is allocated within a geographical region that is managed directly by one of the IPD (International Partner Development) Regional Directors, to further develop business growth and ongoing support by facilitating intercompany activity and exchange in know-how.

The support is also provided by different channels:

- In Country Business & Development Review meetings
- Regional Franchisee Meetings
- Franchise Global Conference
- Dedicated Regional Training events
- Dedicated Audit Program (identified weaknesses becoming training areas)

For franchisees in countries where we have subsidiaries, support is provided via ad hoc channels: e.g. - committees on specific workstreams, monthly meetings with franchisees' representatives, business events twice a year.

#### Termination of agreement

The end of a franchise agreement may be initiated by the company or by the franchisee partner.

In cases of termination, pre-determined rules on advance notice of termination of contract and rules on compensation for termination apply. These rules are designed to ensure that franchisees have sufficient time to manage the transition and compensate for any loss of income resulting from the end of their right to use the Group's brands and services.



In any case, as mentioned above, our franchisees are established vehicle rental companies, which benefit from additional business thanks to our contractual relationship but have capacity to continue their business independently once the agreement is over.

## 4.2.2 – Management of relationships with suppliers

Both for Fleet and Non-Fleet Procurement, the Group works with a large number of suppliers and contractors, and ensures it is not exposed to the risk of depending on only a few strategic suppliers, as demonstrated by the size of its suppliers portfolio.

On the other hand, we want to develop and maintain a responsible relationship with them, which requires a set of guidelines, policies and procedures to manage the relationship at every stage, ultimately contributing to the financial stability of our suppliers and avoiding situations of dependency for them.

### Group Non-Fleet Procurement standards

The Group Non-Fleet Procurement Standards define and describe:

- The overall procurement process.
- The role and responsibility of each stakeholder at each step of the sourcing and procurement process.

These Standards apply to all entities of the Group. Where case specific standards are necessary for a particular entity, amendments could be done in an entity document referring to the Standards. In all cases those specificities must not contradict the dispositions of the Standards and must be validated and approved by the Group Procurement Director.

The Standards cover all equipment and service purchases for both investments (CAPEX) and general expenditures (OPEX) excluding:

- Fleet Acquisition, Fleet Securitization, Fleet Financing
- Insurances
- Annual Rebates, Commissions, Agency Fees
- Marketing Partnerships
- Legal costs & financial auditor fees
- Corporate Financing

The Standards include golden rules and guidelines to follow regardless of the geography:

### Golden Rules (examples):

- All purchases must be completed with suppliers identified or qualified by the Group third party assessment tool, Procurement and the Finance Department.
- EMG should represent an acceptable dependence level of the turnover of the Supplier depending on the spend category. 30% (share of EMobG business into Supplier turnover) should be a maximum. If the share is higher than 30% on an annual basis it has to be closely monitored, described, documented and approved by the local procurement manager.
- When selecting an external solution (supplier, goods or services), a transparent and competitive process must be followed based on:
  - ⊗ Objective and transparent criteria (price, quality, lead-time and services),
  - ⊗ Total cost and end-to-end consideration supported by a detailed business case,
  - ⊗ Competitive, aligned and comparable bids, and team (stakeholders) decision

### Guidelines for:

- Tenders / RFP
- Supplier qualification and creation in our database
- Contract management and documentation
- Supplier performance monitoring

### Group Fleet Procurement standards

For EMG it is business critical to procure vehicles on a very regular basis. Furthermore, the sourcing strategy has to reflect the companies' strategic objectives. Therefore, we need to maintain strong and long lasting relationships with our fleet suppliers in a mutual spirit of partnership, as this is a key success factor.

In that perspective, EMG has a very strict and documented procedure describing how the company evaluates and validates the deals it negotiates with its Fleet suppliers, reflecting the highly strategic nature of its Fleet purchases and the partnership spirit it aims at developing.

Group Fleet Procurement standards are designed to ensure that:

- Relationships with fleet suppliers are balanced:
  - When purchasing large volumes from vehicle manufacturers, we ensure that EMG is never in a dominant position and/or overly dependent on a few suppliers.
- Diversification is possible:
  - EMG is open to source its vehicles from new suppliers, taking a de-risked approach (low volumes, de-risked contractual conditions).
- Offers are assessed thoroughly and fairly:
  - The assessment of the vehicle manufacturers'

offers are subject to a very detailed and strict governance described in a procedure, involving - depending on the Delegation of Authority (DOA) -, fleet sourcing managers, Country and Group Fleet directors, as well the Management Board.

- All vehicle manufacturers' offers are treated and assessed in a fair and transparent way, and are recorded into a centralized tool called Deal Tool.

### Payment practices

- EMG's payment terms comply with local legislation wherever the Group operates.
- The potential vulnerability of some of our suppliers is dealt with on a case-by-case basis, by setting up reduced payment terms for them. This is the case for independent suppliers and SMEs, for whom payment terms can be put in place on request, as part of the commercial relationship.



5

# METHODOLOGICAL NOTE



## 5.1 Period and scope of the CSR Reporting

The CSR Reporting period is the 2024 calendar year (from January 1, 2024 to December 31, 2024).

For information purposes, and unless otherwise indicated, 2024 figures are for Corporate Countries as well as Euromobil held between January 1, 2024 and December 31, 2024.

The scope of the CSR reporting covers the Holding companies, the Shared Services Center, Product and Tech Organization and the Corporate Countries (France, Germany, United Kingdom, United States of America, Italy, Spain, Portugal, Belgium, Ireland, Denmark, Finland, Norway, Luxembourg, Australia and New Zealand) and Euromobil.

The published data are consolidated at Group level, apart from the data on workforce distribution by country. They do not include the franchisee networks.

The 2024 CSR Reporting does include Euromobil, an entity in which Europcar Mobility Group took a controlling stake at the end of 2023.

**Note:** The scope of publication is not exhaustive for all indicators, in particular for key performance indicators, due to recently integrated subsidiaries and different levels of maturity regarding reporting processes.

## 5.2 Organization of the CSR Reporting campaign

The organization of the CSR reporting campaign is detailed in a protocol showing all the processes and

methodologies of the CSR reporting campaign. This protocol is available to each contributor.

### Data collection

CSR reporting is organized and coordinated by the Sustainability Performance Manager in collaboration with the CSR correspondents of the holding companies and the Corporate Countries. At the level of each subsidiary, data collection is managed by the responsible teams, and mainly concerns Human Resources, Operations, Fleet and Management Audit teams.

### Collection tool

To collect and consolidate the data, and ensure the traceability of the data and processes, Europcar Mobility Group used Cority's online non-financial information collection software, Reporting 21. This software was rolled out across all the entities subject to CSR Reporting requirements, and has helped around a hundred contributors to input CSR Reporting data.

### Audit and consolidation of the data

#### 1. Internally

In each entity, data is checked by the teams responsible for reporting the information. Automatic consistency checks are carried out by the collection software and then manually by the team charged with analyzing and consolidating data at Group level: comparing data between countries, comparing against historical data, localized control ratios (such as on the price of resources). Checks are also carried out by both head office teams and by service provider Cority, throughout the campaign and at each key stage. This verification work entails numerous exchanges with the Corporate Countries to ensure the consistency and robustness of the information communicated.,

**2. Verification** of the data by an independent third party organization Forvis Mazars, one of the Company's Statutory Auditors, has been appointed as Independent Third-Party by Europcar Mobility Group to issue a report on the Statement of Non-Financial Performance published in the management report presented in this Universal Registration Document pursuant to the law on Non-Financial Performance Reporting (DPEF in French; law No. 2018-898).

This year, audits took place in two parts in order to ensure a better quality of data: in November and December 2024, the data of the third quarter were reviewed by Forvis Mazars and in January data for the full year were audited.

## 5.3 Choice of indicators

To produce its CSR reports, Europcar Mobility Group has defined a list of indicators based on its main risks and opportunities.

This list contains quantitative and qualitative indicators, broken down into five major categories: Environment, Fleet, Social, Societal and Supply Chain. As such, all the Group's material issues in terms of compliance and dialog with stakeholders are covered, and baseline information can be collected in order to define and steer a CSR strategy.

### Notes on methodology and main limiting factors

The entities within the scope of CSR Reporting are in countries with substantially different laws and practices.

The choice of indicators and their definitions are discussed upstream with the different contributors from the various entities to produce indicators that are as closely tailored as possible to circumstances on the ground.

### Notes on the definitions of certain indicators

- the absenteeism rate does not include employees on maternity and paternity leave;
- the energy and water indicators do not include consumption for vehicle washing by external service providers;
- training indicators include employees who left the company during the year;

### Notes on the greenhouse gas emissions footprint

The GHG emission assessment is an update of the assessment drawn up by the specialist consultancy firm Carbone 4. It was produced based on available data collected during the 2024 CSR reporting campaign.

For CO2 emissions, the Group's internal consumption of energy (mainly electricity and gas) and fuel (diesel and gasoline) were considered. Carbon emission factors specific to each country were applied for electricity consumption, and identical factors were applied for other items. When available, the emission factors used come from the ADEME database.

### Notes on the exclusion of certain data required by the law on the statement of non-financial performance

In view of its activity as a vehicle rental and mobility solutions provider, Europcar Mobility Group has excluded the indicators and data relating to:

- the circular economy,
- the fight against food waste,
- the fight against food insecurity, respect for animal welfare, and responsible, fair and sustainable food
- the link between army and nation and the support to reservists



6

# APPENDIX

Independent third-party report





The limited company with a capital of 146 132 712 €  
Head office: Immeuble Metropolitan, 13 ter Blvd.  
Berthier, 75017 Paris  
RCS 489 099 903

### Report by the independent third-party organization on the verification of the consolidated non-financial statement included in the Group management report

For the year ended December 31, 2024  
This is a free translation into English of the independent third-party organization's report issued in French and is provided solely for the convenience of English-speaking readers. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.

#### To the shareholders,

In our capacity as independent third-party organization, member of Mazars Group and accredited by COFRAC Inspection under number 3-1095 (list of accredited sites and their scope of accreditation available on [www.cofrac.fr](http://www.cofrac.fr)), we have performed work to provide a reasoned opinion that expresses a limited level of assurance on the historical information (observed and extrapolated) of the consolidated extra-financial performance statement (hereinafter the "Information" and "Statement" respectively), prepared in accordance with the entity's procedures (hereinafter the "Guidelines"), for the financial year ended December 31, 2023, presented in the management report of the Europcar Mobility Group (hereinafter the "Entity") in application of the provisions of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the Commercial Code.

### Conclusion

Based on the procedures we performed, as described in the "Nature and scope of our work" and the evidence we collected, nothing has come to our attention that causes us to believe that the consolidated non-financial statement is not presented in accordance with the applicable regulatory requirements and that the Information, taken as a whole, is not presented fairly in accordance with the Guidelines, in all material respects.

### Comment

Without calling into question the conclusion expressed above, and in accordance with the provisions of Article A. 225-3 of the French Commercial Code, we hereby make the following comment: the business ethics risk is not covered by a performance indicator. The Group plans to develop a performance indicator for this risk in 2025.

### Preparation of the non-financial performance statement

The lack of a commonly used framework or established practice on which to base the assessment and evaluation of information allows for the use of alternative accepted methodologies that may affect comparability between entities and over time.

The Statement has been prepared in accordance with the Entity's procedures (hereinafter the "Guidelines"), the main elements of which are presented in the Statement and are available on request from the entity's head office.

### Restrictions due to the preparation of the Information

The Information may contain inherent uncertainty about the state of scientific or economic knowledge and the quality of external data used. Some of the Information is dependent on the methodological choices, assumptions and/or estimates made in preparing the information and presented in the Statement.

### The Entity's responsibility

The Board of Directors is responsible for:

- selecting or setting appropriate criteria for the preparation of the Information;
- preparing the Statement with reference to legal and regulatory requirements, including a presentation of the business model, a description of the principal non-financial risks, a presentation of the policies implemented considering those risks and the outcomes of said policies, including key performance indicators;
- and implementing internal control procedures deemed necessary to the preparation of information, free from material misstatements, whether due to fraud or error.

The Declaration has been established by applying the Entity's Referential as mentioned above.

### Responsibility of the independent third-party organization

Based on our work, our responsibility is to provide a report expressing a limited assurance conclusion on:

- the compliance of the Statement with the requirements of article R. 225-105 of the French Commercial Code;

- the fairness of Information (observed or extrapolated) provided in accordance with article R. 225 105 I, 3° and II of the French Commercial Code, i.e., the outcomes, including key performance indicators, and the measures implemented considering the principal risks (hereinafter the "Information").

We conducted our work in order to provide a reasoned opinion expressing a limited level of assurance on the historical, observed and extrapolated information.

As it is our responsibility to express an independent conclusion on the Information prepared by management, we are not authorized to be involved in the preparation of such Information, as this could compromise our independence.

This is not our responsibility to express an opinion on:

- the entity's compliance with other applicable legal and regulatory requirements (in particular with regard to the due diligence plan and the fight against corruption and tax evasion);
- the compliance of products and services with applicable regulations

### Regulatory provisions and applicable professional standards

The work described below was performed with reference to the provisions of articles A. 225-1 et seq. of the French Commercial Code, as well as with the professional guidance of the French Institute of Statutory Auditors ("CNCC") applicable to such engagements and with ISAE 3000\* (revised).

This report has been prepared in accordance with the RSE\_SQ\_Programme de vérification\_DPEF.



## Independence and quality control

Our independence is defined by the requirements of article L. 822-11-3 of the French Commercial Code and the French Code of Ethics (Code de déontologie) of our profession. In addition, we have implemented a system of quality control including documented policies and procedures regarding compliance with applicable legal and regulatory requirements, the ethical requirements and the professional doctrine of the French National Association of Auditors.

## Means and resources

Our work was carried out by a team of 5 people between October 2023 and March 2025 and during 11 weeks.

We conducted about twenty interviews with the people responsible for preparing the Statement, representing the CSR, Human Resources, Compliance, Fleet, Purchasing, and Customer Satisfaction departments.

## Nature and scope of our work

We planned and performed our work considering the risks of significant misstatement of the Information. We estimate that the procedures we have carried out in the exercise of our professional judgment enable us to provide a limited assurance conclusion:

- we obtained an understanding of all the consolidated entities' activities and the description of the principal risks associated;
- we assessed the suitability of the criteria of the Guidelines with respect to their relevance, completeness, reliability, neutrality and understandability, with due consideration of industry best practices, when appropriate;

- we verified that the Statement includes each category of social and environmental information set out in article L. 225 102 1;
- we verified that the Statement provides the Information required under article R. 225-105 II of the French Commercial Code, where relevant with respect to the principal risks, and includes, where applicable, an explanation for the absence of the Information required under article L. 225-102-1 III, paragraph 2 of the French Commercial Code;
- we verified that the Statement presents the business model and a description of principal risks associated with all the consolidated entities' activities, including when relevant and proportionate, the risks associated with their business relationships, their products or services, as well as their policies, measures and the outcomes thereof, including key performance indicators associated to the principal risks;
- we referred to documentary sources and conducted interviews to:
  - assess the process used to identify and confirm the principal risks as well as the consistency of the outcomes, including the key performance indicators used, with respect to the principal risks and the policies presented, and;
  - corroborate the qualitative information (measures and outcomes) that we considered to be the most important presented in Appendix 1. Concerning certain risks "Breach to Group Code of Ethics", "Personal Data Protection", "Violation of social regulations in the value chain", and "Violation of trade union rights", our work was carried out on the consolidating entity, for the others risks, our work was carried out on the consolidating entity and on a selection of entities\*\*;

- we verified that the Statement covers the scope of consolidation, i.e., all the consolidated entities in accordance with article L. 233-16 of the French Commercial Code within the limitations set out in the Statement;
- we obtained an understanding of internal control and risk management procedures implemented by the entity and assessed the data collection process to ensure the completeness and fairness of the Information;
- for the key performance indicators and other quantitative outcomes that we considered to be the most important presented in Appendix 1, we implemented:
  - analytical procedures to verify the proper consolidation of the data collected and the consistency of any changes in those data;
  - tests of details, using sampling techniques, in order to verify the proper application of the definitions and procedures and reconcile the data with the supporting documents. This work was carried out on a selection of contributing entities 2 and covers between 22% and 100% of the consolidated data relating to the key performance indicators and outcomes selected for these tests;
- we assessed the overall consistency of the Statement based on our knowledge of all the consolidated entities.

We are convinced that the work carried out, based on our professional judgement, is sufficient to provide a basis for our limited assurance conclusion; a higher level of assurance would have required us to carry out more extensive procedures.

*The CNCC considers that the translation is not signed, as it is a free translation into English of the original report drawn up in French. Indeed, the signature is the graphic means by which a person identifies himself in a document and by which he expresses his approval of the content of the document. Moreover, the affixing of a signature on a report confers on it the quality of being an original. In this particular case, the original is the French version of the report.*

\*\* Ireland, Spain and Germany



APPENDIX 1 - Information reviewed in tests of details

Topics	Key Performance indicators and other information
Environment	Proportion of Plug-in hybrid and electric vehicles in the fleet at December 31st, 2024
	Number of kilometers covered by plug-in hybrid and electric vehicles in the fleet
	Average detention period of vehicles
	Average emissions of CO2e/km from vehicles at December 31st, 2024
	Greenhouse gas emissions from energy and fuel consumption
	Proportion of vehicles washed without water nor movement
	Number of country subsidiaries having an ISO 14 001 certification
Social	Total workforce and breakdown of employees according to gender
	Hires and departures
	Proportion of employees who have received training during the year
	Frequency rate of work-related accidents
	Proportion of employees covered by collective agreements
	Proportion of medium or high risk suppliers that have been evaluated on their CSR performance
	Net Promoter Score



