



2022

Sustainability & CSR Impact Report

Speeding up

the mobility movement

getting you there



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Preface



At Athlon, we believe in making a difference by taking action and supporting social and sustainable initiatives that make the world a better place.

Mobility is moving rapidly towards electric and more flexible options. To accelerate this movement, we want to inspire people to change their habits. It is one of the main topics our customers want to talk about whenever we meet. Personally, I believe in the power of co-creation and that we will reach a net carbon-neutral fleet by bringing in the perspectives, needs and experiences of our customers, suppliers and partners. We took the first steps to create a Learning Platform, which facilitates knowledge sharing on the way.

It's important to me to also highlight how our employees engage in many ways to contribute to social interests, for example by volunteering to help refugees or rolling up the sleeves to repair playgrounds and animal shelters.

Read on to find out more about how Team Athlon contributes to sustainability and society - and feel free to reach out if you want to join any of our initiatives!

Sincerely,

Christian Schüler
CEO Athlon



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01

Athlon at a glance

Athlon develops sustainable, flexible and cost-efficient business mobility solutions. Established over a hundred years ago, we have grown to become one of Europe's top 5 providers of multi-brand vehicle leasing and fleet management. Our vision? To shape sustainable mobility.

Local expertise on an international level

- Around 2,000 employees
- Present in 20 countries: 11 European countries through Athlon entities + 9 additional countries through partner networks
- The Athlon fleet consists of nearly 400,000 cars and vans. If we include vehicles provided by partners, our total fleet amounts to 500,000 vehicles
- Our headquarters are located in the Netherlands, in Schiphol. We are a part of Mercedes-Benz Mobility AG

● Athlon locations

Belgium
France
Germany
Italy
Luxembourg
Netherlands
Poland
Portugal
Spain
Sweden
United Kingdom

● Athlon Partner locations

Austria
Czech Republic
Denmark
Hungary
Norway
Republic of Ireland
Romania
Slovakia
Turkey

Getting you there

Athlon is an expert in sustainable business mobility. In our journey toward seamless, connected and sustainable mobility, every step matters. We guide our customers toward smarter and more conscientious travel choices. As a one-stop shop, we offer them the right tools to change their mobility behaviour. Together, we can build a better future for all of us – and Athlon will get you there.

Our vision, mission and values

Smart and sustainable mobility lies at the heart of our business. Whatever your destination, your beliefs, or your business goals: Athlon gets you there.

Our team guides, supports and delivers the fleet and mobility solutions that are the best for our customers, society and our company. Our efforts to shape sustainable mobility allow us to continue to grow. The Athlon fleet currently consists of approximately 400,000 cars and vans. By 2025, at least 50% of our fleet should be electric.

The world of mobility is changing. Flexibility is key, and our customers need an experienced partner to achieve their climate goals and economic ambitions. By working closely together, we transform their car policies into future-proof mobility policies. The Athlon teams bring with them knowledge and experience that helps companies create an attractive mix of solutions for their employees.

Our strategy

Athlon aims to create profitable and sustainable growth, driven by our people and by efficient digitized operations. To achieve our goals, we focus on Growth, Digital, Green, People and Performance.

GO! Green Impact Areas

Our focus on 4 impact areas helps us to accelerate our sustainability journey. We have created a GO! Green 360° approach:

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

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

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

We shape sustainable mobility. That's **our vision**.

We live by our core values:

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



Our products and services

Athlon specializes in creating one-stop-shop sustainable mobility solutions for business customers and individuals. We offer a wide range of options for smart, connected and seamless mobility.

Full-service leasing

- **Athlon Lease:** a full-service leasing formula for company cars, suited to the needs of the employee and tailored to the car & mobility policy of the employer.
- **Athlon VanLease:** a full-service leasing formula for commercial vans for any company, with a personal approach to provide our customers with the ideal van(s) and the optimal service level to boost their business.
- **Athlon EmployeeLease:** a full-service leasing formula offered by employers to employees without a company car, providing them with access to affordable and sustainable vehicles.
- **Athlon BikeLease:** a full-service leasing formula for a company bike, as an optional add-on to an Athlon Lease contract.

Flexible mobility 'on demand'

- **Athlon MobilityBudget:** employees are offered a set budget by their employer, granting them access to various mobility options, such as a company car, taxis or the use of public transport.
- **Athlon Rent:** an on-demand full-service solution for passenger cars and commercial vans, for short- and mid-term rentals.
- **Athlon Flex:** an on-demand all-inclusive solution with an agreed minimal duration that provides employees full control over their individual mobility, tailored to their changing needs.
- **Athlon Subscription:** an on-demand service in which the customer pays a flat fee for the right to use a vehicle as long as needed. The lease term is agreed upon for a fixed period of time, with the option of monthly renewal.

Additional mobility-supporting solutions

- **Athlon Consulting:** Athlon's mobility consultants provide customers with expert advice to guide them in their journey toward future-proof business mobility.
- **Athlon Charge:** an optional service for electric vehicles that provides customers with consulting services for charging facilities at home or at the office, and/or with an Athlon Charge Card that provides reimbursement for home charging and billing for public (rapid) charging.
- **Athlon RoadSafety:** customers are provided with solutions to improve their employees' safety on the road. The package includes technology that stimulates people not to text when they are driving, and tailor-made e-learnings that focus on improving individual driving behaviour.



Our supply chain

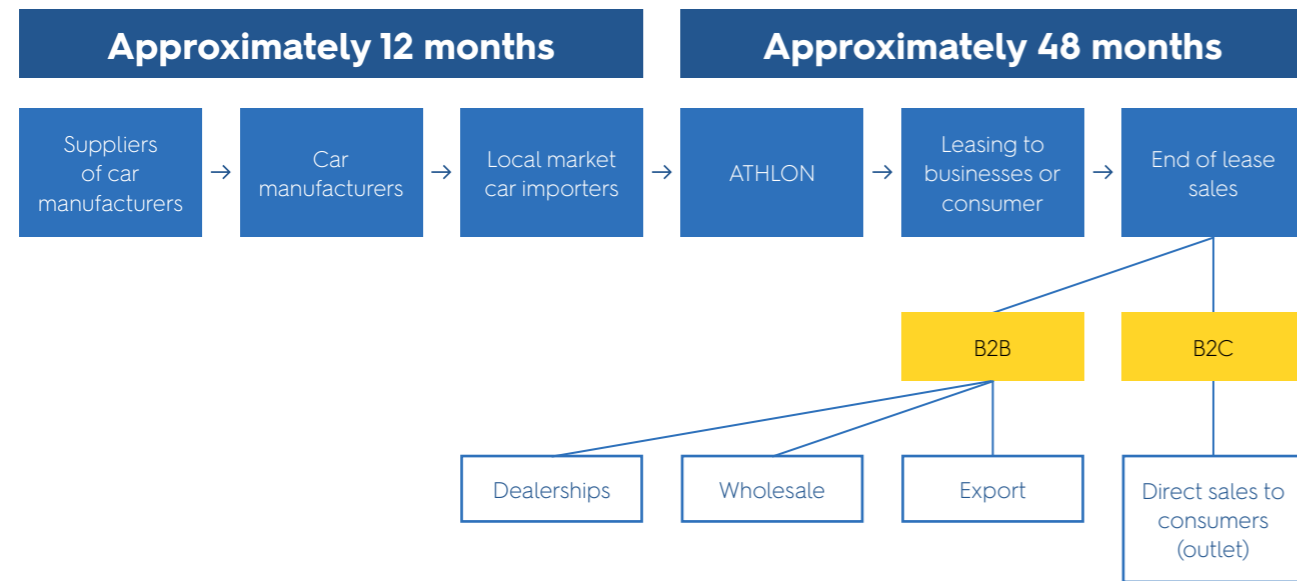
We have two major supply chains: a car-related one and a second one for products and materials that do not directly pertain to our fleet. Our procurement departments are organized accordingly. It is important to note that our car-related supply chain is significantly longer than the non-car-related one.

The car-related supply chain mainly includes car manufacturers and their suppliers, but also involves buyers and sellers of 'end-of-life' leasing vehicles. During the period of (approximately) 48 months in which a car is part of our fleet, we have a very large impact on the supply chain. Before and after this, our impact on the other links in the chain is limited. To increase our upstream impact, all our suppliers have to commit to our Responsible Sourcing Standards. These standards define our supplier expectations

- with regard to responsible business conduct, in line with the following corporate principles:
1. We are both profitable and committed to people and the environment.
 2. We act respectfully and respect rules.
 3. We address issues openly and uphold transparency.
 4. Our collaborations are based on fairness and respect.
 5. We practise diversity.

The supply chain that is not car-related includes various products and services to keep our operations running smoothly (e.g. electricity, paper, coffee, etc.). In most cases, we buy from wholesale businesses or directly from the manufacturer. These non-car-related suppliers also have to commit to the Responsible Sourcing Standards.

Car-related supply chain



Non-car-related supply chain





Sustainability & CSR Scorecard

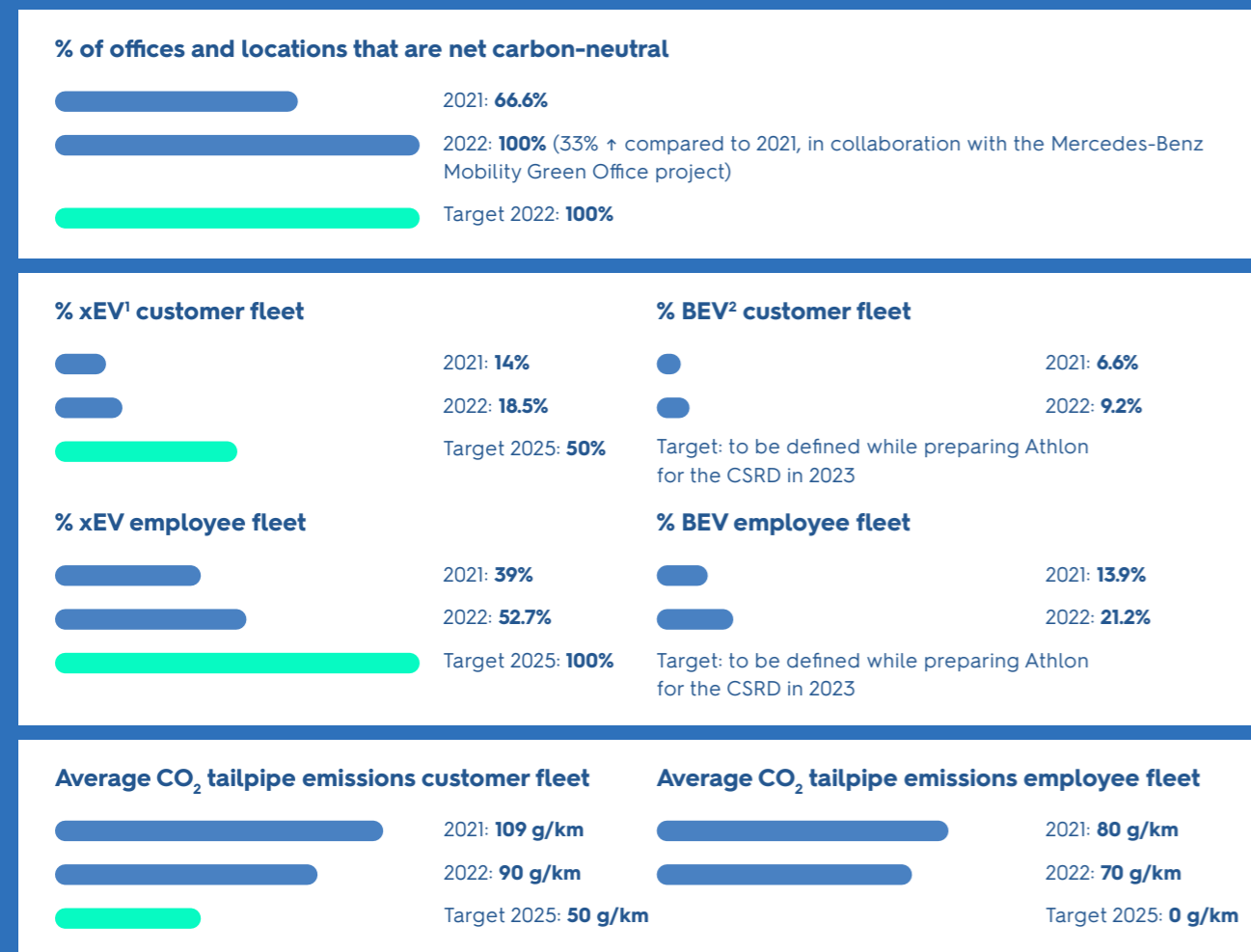
Sustainability & CSR Scorecard

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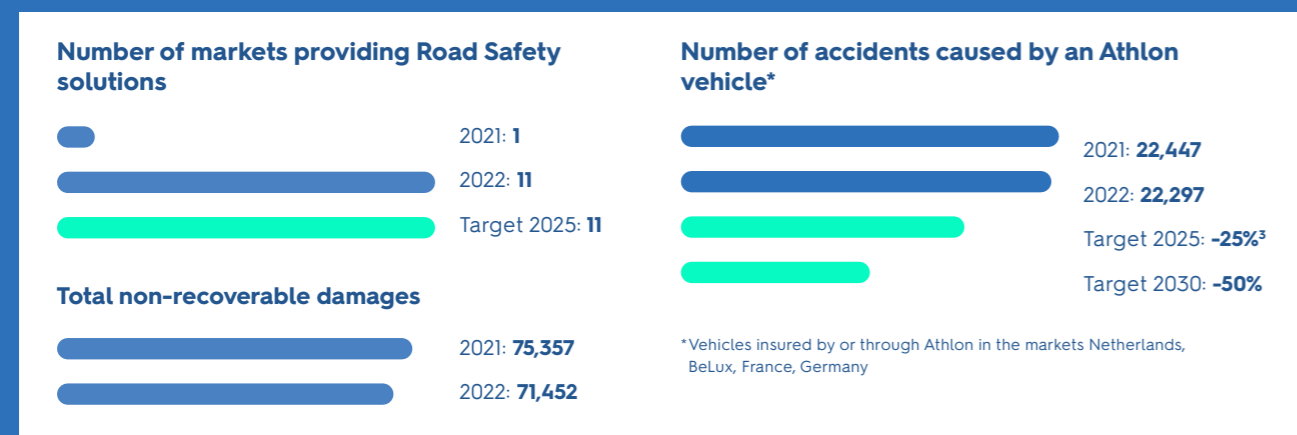
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Sustainability & CSR Scorecard

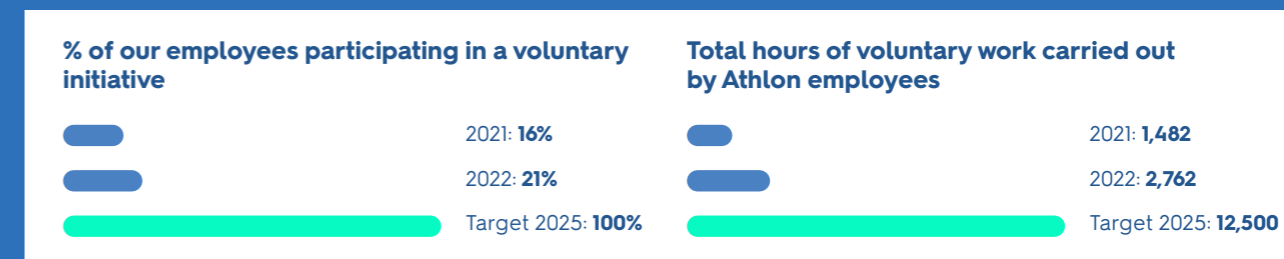
Climate Action



Road Safety



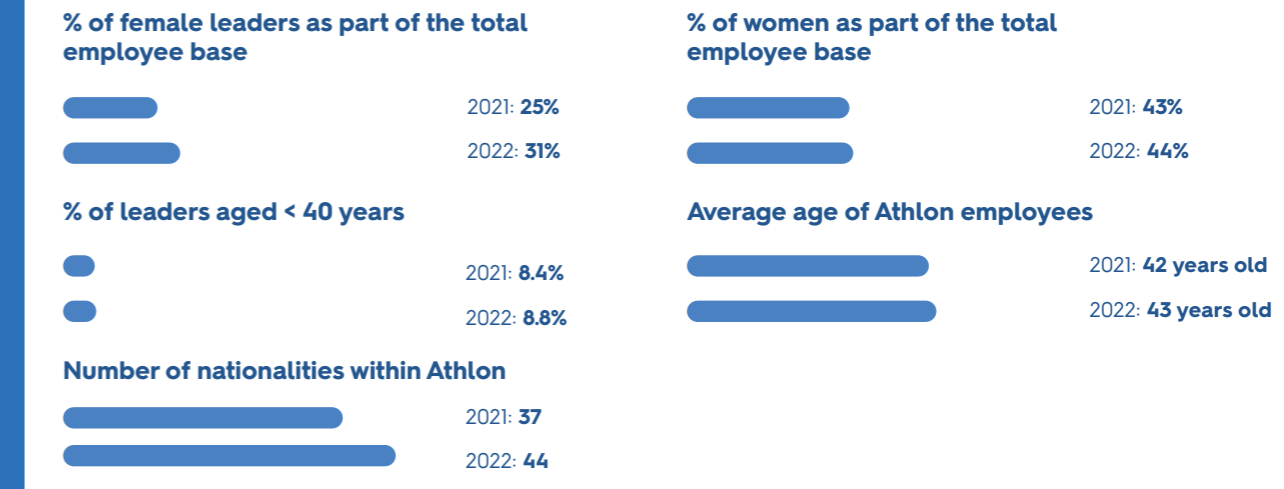
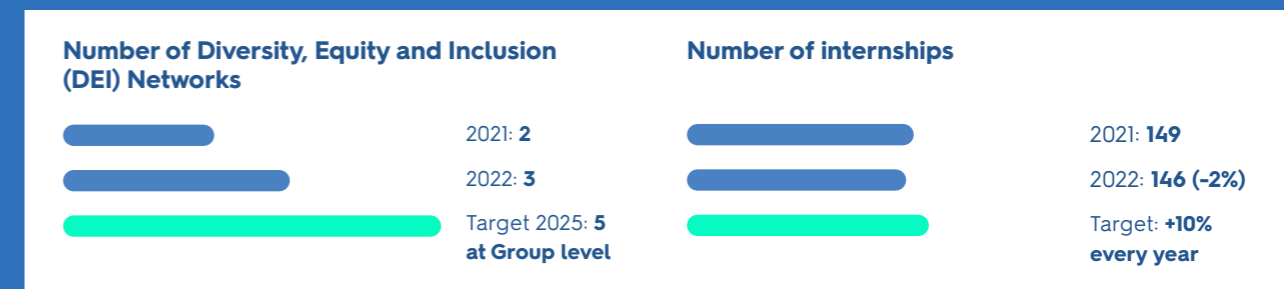
Community Engagement



Vital People



Diversity, Equity and Inclusion



¹ Entirely or partly electric vehicles ² Battery electric vehicles ³ Reduction in %, baseline 2022



Our Sustainability & CSR Strategy

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03

“It all starts with your empowering beliefs”

Alexander Heijkamp, Sustainability & Corporate Social Responsibility (CSR) Director

Sustainable leaders often have sustainable thoughts that lead to sustainable habits. All successful sustainable leaders once started out by believing in a better future. It was not luck or coincidence: from the start, they truly desired to have a positive impact on the environment and on society. Such empowering thoughts and beliefs help people to take positive action and create new habits.

When it comes to Sustainability & CSR, everything starts with setting clear goals. What do you want to achieve, and – more importantly – why do you want to achieve it? Overcoming your limiting beliefs is the key to start having a positive impact. This is true for individuals, but also for companies: if you replace a negative mindset with positive and empowering beliefs, you can start working on a sustainable future. Some people say that making changes is 20% about strategy and 80% about mindset. So, find out what you are deeply passionate about, and let that drive your business approach.

Collaboration is key

Of course, no-one can change the world alone. To really have a positive impact on the planet and on society, you need to draw your internal and external stakeholders into your empowering mode and convince them to take action together. All around the world, people are becoming more aware of the big social and environmental challenges we face. Record temperatures, floods and extreme weather conditions are gradually making climate change much more tangible. Societal challenges are also increasing, due to geopolitical events. Among your employees, customers and other stakeholders, many people are willing to be a part of the solution. So, let's join forces and work together to change the way we work and live.

In 2022, we collaborated with various partners to develop new sustainable solutions. For example, our new RoadSafety proposition includes specific driver safety solutions, and our eMobility proposition offers a net carbon-neutral option with charging solutions that facilitate charging at home, at the office and on the road. We also took measures to enhance Diversity, Equity and Inclusion, and to give something back to society. Our positive mindset was an important driver behind these initiatives: we rely on our ability to change the game in mobility and to create a positive impact on society, together with our stakeholders.

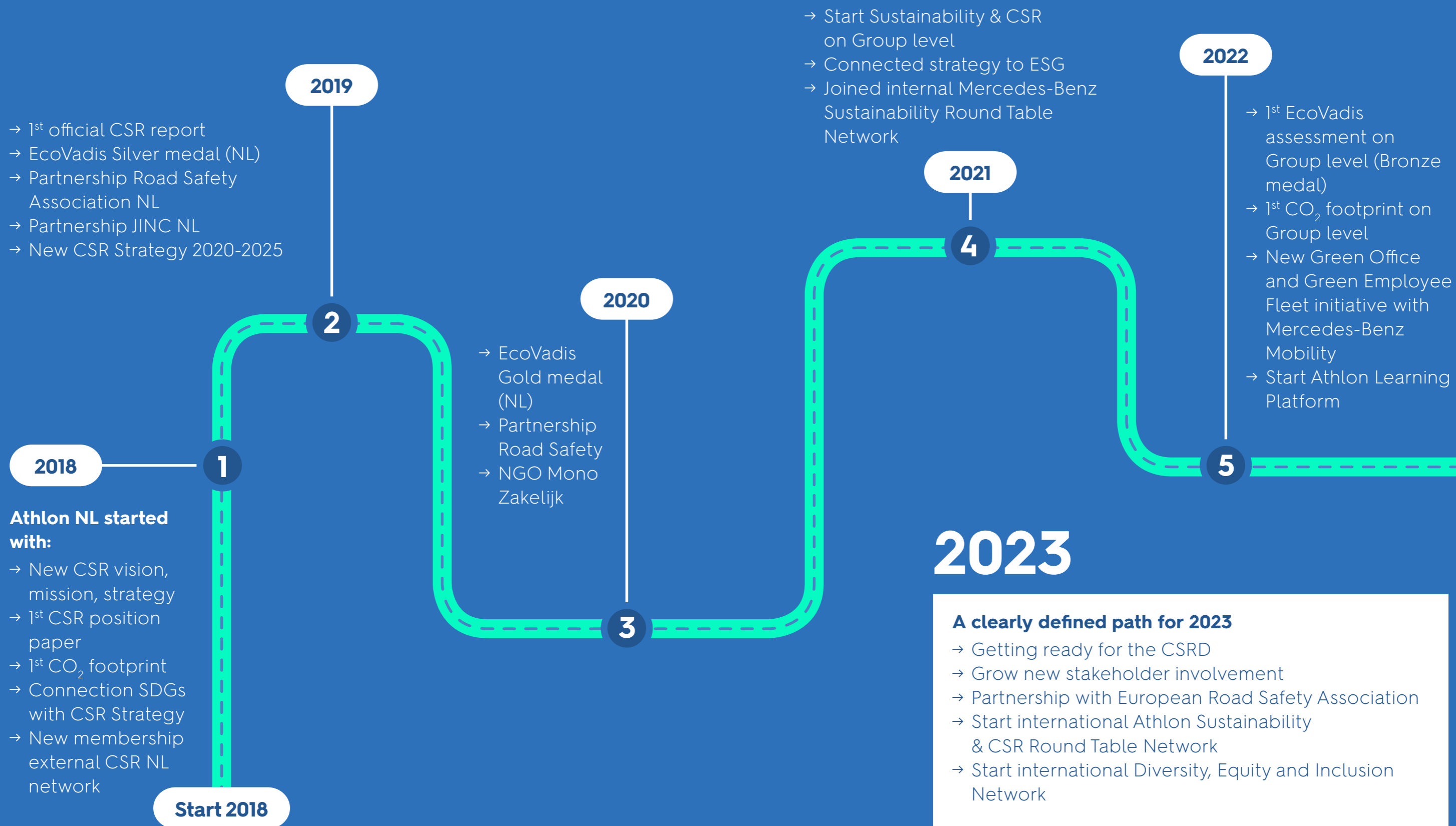
Speeding up the sustainable movement

In November 2022, the European Commission adopted new sustainability reporting rules for large companies. The Corporate Sustainability Reporting Directive, or CSRD for short, will speed up the sustainable and social business transition in the EU, and help Europe to become the first climate-neutral continent in the world. It creates a level playing field for sustainability disclosures and allows frontrunners in environmental, social and ethical topics (ESG) to inspire others.

Athlon supports the new directive, because it challenges all of us to rethink our impact on the environment and on society, and to take responsibility for it. A positive mindset and a 'can-do' mentality are important for making a change. Of course, we are sometimes confronted with our own limiting beliefs, but at Athlon we choose to focus on empowering beliefs. And that is where the magic starts! Will you join us?

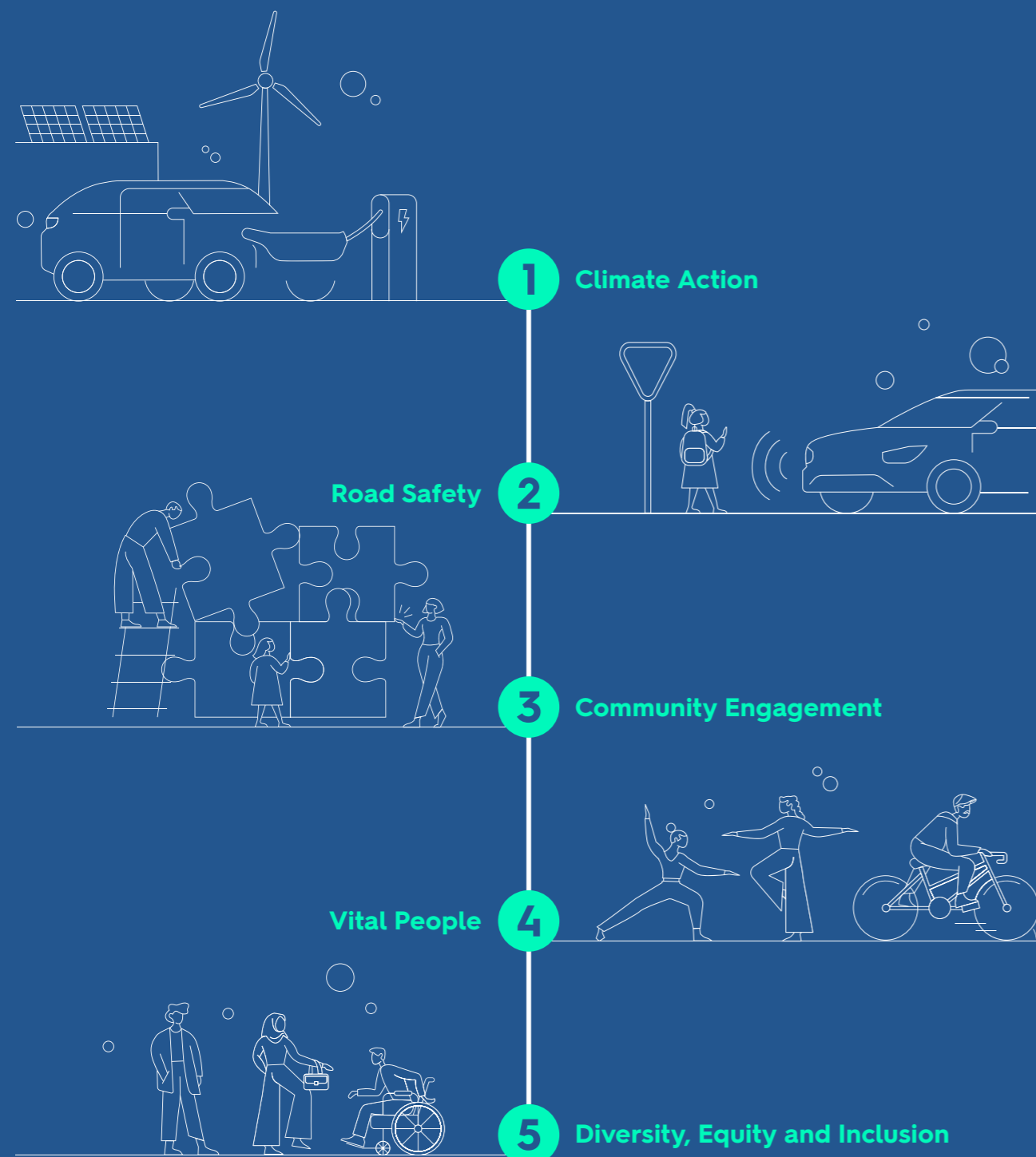


Sustainability & CSR Timeline



Co-creating the future of mobility: our 5 impact areas

To create a greener and better world, we need to do more than simply replace fuel cars with electric vehicles (EVs). When co-creating the future of mobility, Athlon takes every part of Sustainability & CSR into account. All our stakeholders are included in the co-creation process, from customers to Athlon employees, and all the people we are connected to. Our material topics are summarized in five 'Sustainability & CSR impact areas', which are closely connected to the ESG framework:



UN Global Compact and OECD guidelines

Athlon's Sustainability & CSR Strategy supports the ambitions of our shareholder Mercedes-Benz AG. We follow their guidelines and take on their commitments. As a founding member of the UN Global Compact, the Mercedes-Benz Group is strongly committed to this, the world's largest business sustainability initiative. The Group's internal principles and policies are based upon this international frame of reference and other international principles, including the Core Labour Standards of the International Labour Organization (ILO), the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. To strengthen our participation in the UN Global Compact, our specialized units are active in a variety of working groups, for example, regarding transparency, reporting and responsibility in global supply chains.

Connecting Sustainability and CSR to ESG

Athlon's Sustainability & CSR Strategy is strongly connected to the ESG framework, which also underpins the Corporate Sustainability Reporting Directive (see box). Our sustainability impact areas target the 'E' (Environment), whereas our CSR impact areas focus on the 'S' (Social). The 'G' (Governance) is expressed in the structures and policies that support our Sustainability and CSR measures.

→ In the context of our Sustainability Strategy, we analyse our impact on the environment and use our insights to guide customers toward more sustainable and flexible mobility. This advisory role is our Sustainability Business Value Proposition. The easiest advice would be to switch completely to EVs, but, in our opinion, it is more realistic to adopt a gradual change programme, in which electrification, charging options, flexibility and safety are all parts of the solution. Our overarching aims are always to lower our customers' carbon footprints and to guide people in making smart mobility choices. Our most important impact domains are Climate Action and Road Safety. Our Sustainability Strategy includes several specific commitments and targets.

→ With our CSR Strategy, we focus on our people targets: we want to be the employer of choice in mobility. Our Employee Value Proposition (EVP) includes contributing to society and helping our employees to feel good and be themselves. CSR concerns the physical and mental health of our people, our measures to enhance diversity, equity and inclusion, and our efforts for the community: we encourage Athlon employees to give something back to society. Here as well, several commitments and targets shape our CSR Strategy.

The Corporate Sustainability Reporting Directive (CSRD) requires the 50,000 largest companies in Europe to publish an annual sustainability report, starting from the 2025 fiscal year. With this directive, Europe aims to fight greenwashing and allocate resources to truly sustainable companies. The CSRD is supplemented by new European standards, which stipulate the conditions that the reporting must meet.

Both strategies are based on the Golden Circle approach by Simon Sinek: always start with ‘why’ you want to do something, then explain ‘how’ you will do it, and finally focus on ‘what’ solutions you offer. We believe our customers choose Athlon not just because of our products (what), but because they believe in our vision and values (why). The same goes for our employees: we want them to work at Athlon because they agree with our vision and our way of working. Through our Athlon Learning Platform, we encourage our employees and customers to start learning from each other, because collaboration and co-creation are the best ways to obtain good results.

To measure is to know

In order to monitor our progress, we have created key performance indicators (KPIs) that relate directly to our commitments. These KPIs allow us to assess the performance of all Athlon markets and to learn from the frontrunners. Our Sustainability & CSR changemakers frequently share their insights and developments through our knowledge sharing network and the Athlon Social Intranet. Every two months, the Athlon Management Board discusses the developments during a market sounding board.

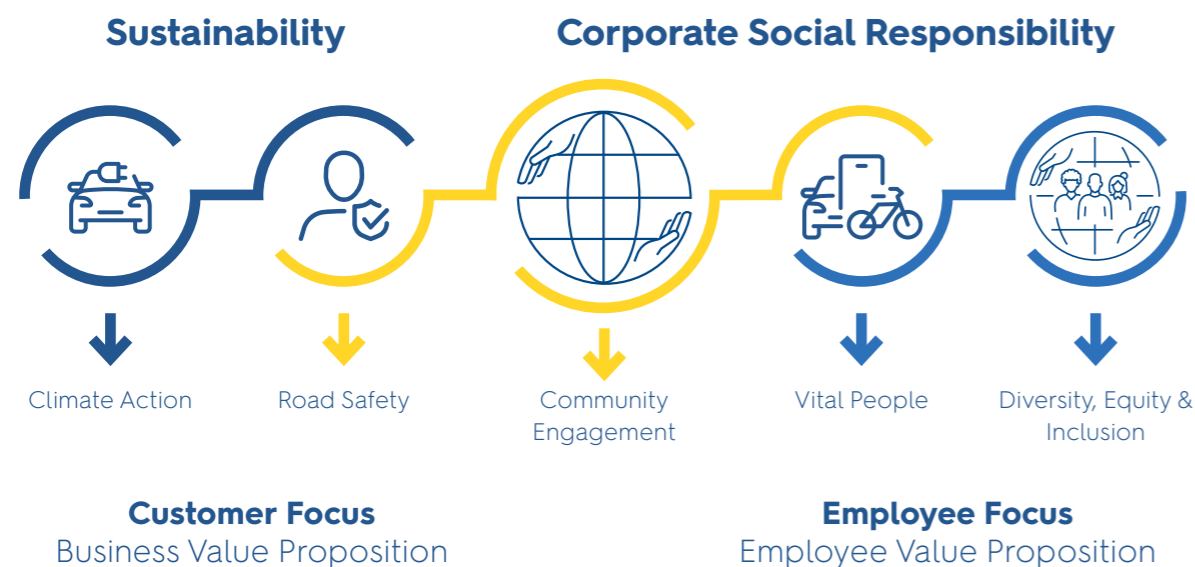
The KPI dashboard on Sustainability & CSR is updated automatically every month, based on data sources with real-time information.

Work in progress

In 2020 and 2021, Athlon developed an International Sustainability & CSR Strategy, with a corresponding vision and mission. The new strategy was launched in May 2021, in all European Athlon markets and through networks like Fleet Europe. We visited all Athlon offices with a full electric car (Athlon Project Zero) and launched our new strategy in-person in all markets. With **Athlon Project Zero**, we have proven that driving an EV all the way through Europe is already possible. In 2022, we sped up the movement with a new internal knowledge-sharing network, which is open to Sustainability & CSR changemakers from every Athlon market.

The Athlon Sustainability & CSR network consists of employees who are intrinsically motivated to contribute to the sustainability transition. In some larger Athlon markets, this comes with a formal role, while in others, Athlon colleagues simply take on the commitment. In the end, Sustainability & CSR are the responsibility of everyone within Athlon.

Our next step will be to enlarge our network with external partners and to change the game in mobility, together with our customers, employees and other important stakeholders. By sharing knowledge, experiences and inspiration, we aim to become more impactful every day.



Athlon Project Zero, a full electric road trip covering 12,000 kilometres, 11 countries and zero tailpipe CO₂ emissions. The experience provided us with valuable insights in driving an EV over long distances and we have proven that driving an EV all the way through Europe is already possible.

Our contribution to the SDGs

To define our impact on society, we link our Sustainability & CSR Strategy to the Sustainable Development Goals (SDGs). The SDGs were adopted by the United Nations in 2015. They consist of 17 goals and 169 underlying targets, created to address global issues like climate change, inequity, hunger and poverty. Around the world, 195 countries have committed to the SDGs.

The SDGs help us focus on our impact areas. The shared language also makes it easier to cooperate with other organizations and contribute to the same ambitions. In collaboration with a working group from Nyenrode

Business University in the Netherlands, we have determined the SDGs on which we have the most impact.

- Our high impact SDGs are:
- SDG11: Sustainable Cities and Communities
 - SDG12: Responsible Consumption and Production
 - SDG13: Climate Action
 - SDG17: Partnerships for the Goals

By placing these SDGs alongside the ESG framework, it becomes clear that Athlon has an impact on all 3 ESG domains.

Environment			Social			Governance		
6 CLEAN WATER AND SANITATION	7 AFFORDABLE AND CLEAN ENERGY	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	1 NO POVERTY	2 ZERO HUNGER	3 GOOD HEALTH AND WELL-BEING	5 GENDER EQUALITY	8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE
11 SUSTAINABLE CITIES AND COMMUNITIES	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION	4 QUALITY EDUCATION	5 GENDER EQUALITY	6 CLEAN WATER AND SANITATION	11 SUSTAINABLE CITIES AND COMMUNITIES	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION
14 LIFE BELOW WATER	15 LIFE ON LAND		8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	10 REDUCED INEQUALITIES	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	17 PARTNERSHIPS FOR THE GOALS	
			12 RESPONSIBLE CONSUMPTION AND PRODUCTION	16 PEACE, JUSTICE AND STRONG INSTITUTIONS				



Our carbon footprint

Our approach

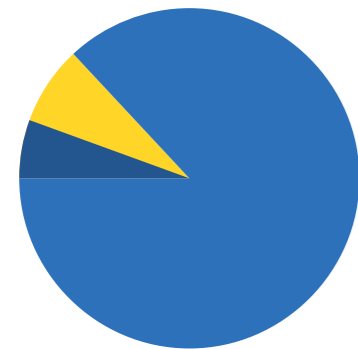
In 2022, Athlon started a collaboration with Groenbalans in the Netherlands. The aim: to establish a Carbon Management System and begin monitoring the CO₂ footprint (Scopes 1, 2 and 3) of the Athlon Group on a monthly basis.

We set up an international CO₂ footprint working group and started collecting data. We also defined 2022 as the baseline for our future targets and commitments.

In the course of 2023, we will work on a CO₂ emission reduction plan in order to reduce our footprint.

In 2023, we will initiate fact-based dialogues with our stakeholders about our environmental and social impacts. CO₂ emissions will be one of the key issues. By measuring our Scope 3 emissions every year, we will gain greater knowledge and insight. This will allow us to further improve our CO₂ performance.

CO₂ footprint 2022



- Business travel
- Electricity (buildings)
- Fuel and heating (buildings)

Overview CO₂ emissions Athlon

Emissions – excluding customer fleet		
	Tonnes CO ₂ -eq	%
Scope 1 emissions	3,185.7	79.4
Scope 2 emissions	649.0	16.2
Scope 3 emissions	179.5	4.5
Gross total emissions excl. customer fleet	4,014.2	100
Avoided emissions	3,532.1	88
Net total emissions excl. customer fleet	482.14	12
Net total emissions excl. customer fleet per FTE	0.2843	
Net total emissions excl. customer fleet per vehicle	0.0012	
Emissions – including customer fleet		
	Tonnes CO ₂ -eq	%
Emissions customer fleet	1,767,372.5	99.8
Gross total emissions incl. customer fleet	1,771,386.7	100
Net total emissions incl. customer fleet	1,767,854.6	99.8
Net total emissions incl. customer fleet per FTE	1,042.4	
Net total emissions incl. customer fleet per vehicle	4.4	

In 2022, our gross carbon footprint (excluding customer fleet emissions) was 4,014 metric tons of carbon dioxide equivalent. The largest share (87%) of these emissions was caused by business trips, both by car and by plane. In addition, around 8% of our emissions were the result of the heating of office buildings. If we include emissions from our customer fleet, our gross carbon footprint in 2022 was 1,771,386 metric tons of CO₂ equivalent. This means that our customer fleet creates 99.8% of our carbon footprint.

For 2022, Athlon decided to compensate for the CO₂ emissions of our employee fleet and for our use of 'grey' electricity. Together with Mercedes-Benz Mobility, we invested in two Gold Standard compensation projects. The Gold Standard for the Global Goals is a

comprehensive standard that accelerates global progress toward climate security and sustainable development.

One of our Gold Standard projects is aimed at the dissemination of improved cooking stoves and low-carbon water purification technologies to households, communities, and institutions in Nigeria and Kenya. **The other** utilizes geothermal energy for electricity production, to be fed to a grid in Indonesia. Recently, we also started investing in a **VCS (Verified Carbon Standard) compensation project**. Athlon Netherlands has already invested in this waterpower energy project in India, which enables the creation of renewable energy. The project aims to reduce CO₂ emissions and to develop the area in a sustainable way.





Getting ready for the CSRD

In November 2022, the European Commission adopted new sustainability reporting rules for large companies. The Corporate Sustainability Reporting Directive (CSRD) aims to speed up the climate transition in Europe by urging companies to invest in truly sustainable economic activities. It incorporates various international reporting frameworks, and creates a level playing field for sustainability disclosures.

The CSRD will apply to Athlon from 2026 onward (reporting in 2026 on 2025 data). We have adopted a structured approach to prepare for the new directive. In 2022, our Sustainability & CSR Director took various courses and masterclasses on CSRD, ESG and CO₂ footprint calculation. We also initiated several partnerships to get ready for the new regulations. The Management Board decided on the following timelines and actions:

- **Q1 2023:** calculate the CO₂ footprint on a local level and on Group level, including Scope 1, 2 and 3 (partnership with Groenbalans/The Netherlands)
- **Q1 2023:** start preparing a CO₂ footprint reduction plan
- **Q2 2023:** establish an ESG steering group, carry out a benchmark and CSRD gap analysis (partnership with Pantarein)
- **Q3/Q4 2023:** deepen our insights with the ESG steering group and initiate a dialogue with our internal and external stakeholders to create a Double Materiality Matrix, including a stakeholder analysis
- **Q4 2023:** (re)define our targets (2030), in line with our new CSRD-proof strategy, including a technical roadmap on how to get there

ESG steering group

In Q2 of 2023, we will establish a formal ESG steering group. Members of this group are both Board members and employees from various departments in our organization. We will select 15 members, all of whom are expected to be fully committed to the ESG framework.

ESG longlist

In the first half of 2023, we will carry out a benchmark and CSRD gap analysis, based on desk research and interviews with internal key stakeholders. This should result in a longlist of ESG impacts, risks and opportunities that are or can become significant to Athlon. The longlist will be the input for designing a new Double Materiality Matrix.

New Double Materiality Matrix

We will present our longlist of ESG matters to our internal and external stakeholders (employees, customers, suppliers, banks, sector experts and NGOs). With an extensive online survey, we aim to reach as many stakeholders as possible. In addition, we will organize a number of qualitative interviews.

Based on the outcome, an assessment of the most significant topics follows. We will decide which matters are to be incorporated into our revised Sustainability & CSR Strategy and our overall reporting.

ESG roadmap

Our next step will be the development of the new Athlon 'ESG roadmap', including our material topics, our commitments and our targets & KPIs. The roadmap will also cover the mandatory goals and disclosure requirements of the CSRD and the EU Taxonomy.

Once we have defined our own ESG roadmap, we will encourage our suppliers and customers to start the same process, and also support them in this regard. In this way, Athlon aims to co-create a sustainable and social future, together with our customers and other stakeholders.

Getting

us there

Climate Action

Road Safety

Community Engagement

Vital People

Diversity, Equity and Inclusion



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04

Climate Action – A healthy planet

Why we care

Passenger car and light commercial vehicle (LCV) emissions represent around 15% of the EU's total greenhouse gas emissions. Following the European Green Deal, which aims for Europe to become climate neutral by 2050, we need to reduce our transport emissions by 90% or more. That is quite the challenge, and the EU Green Deal 'Fit for 55 package' will certainly help in achieving this goal. But the incentive is crystal clear: a shift toward more sustainable mobility would benefit the planet and the environment in more than one way. For example, it would greatly reduce the level

of NOx gases, fine particles and other pollutants in European cities. This would result in fewer acute respiratory infections, chronic respiratory diseases and cardiovascular diseases. Moreover, sustainable vehicles tend to cause less noise pollution, which has a positive effect on people's physical and mental health. By seeing electric cars, flexible mobility, vehicle sharing systems, bicycles and public transport as parts of the solution, we can lead the way toward more sustainable mobility and a healthier planet.

Marchel Koops,
CCO Athlon



"Climate change is threatening the way we live and the future of our planet. To help fight it, we empower our customers to pursue low-emission mobility. That's not as easy as it sounds: even for me, working on electrification of mobility, driving a full electric car took a mental shift. However, once you are aware of the energy you use and the emissions you cause, you start thinking of other measures you could take, like installing solar panels to charge the car with renewable energy. Electric vehicles help people to change their habits and rethink their mobility needs. The shift can even start a sustainability movement within an organization, just like it did at Athlon. My advice to other companies is to approach the journey toward a fully electric fleet as a part of a larger ESG transition. In this way, it becomes a positive movement throughout the organization."

Our contribution to the solution

To help fight climate change, Athlon develops sustainable mobility solutions. After all, our biggest impact on the environment results from the customer fleet (Scope 3 emissions). In 2022, the entire Athlon customer fleet emitted 1,767 ktonnes of CO₂ (out of a total gross CO₂ footprint of 1,772 ktonnes, Scope 1, 2 and 3 at Group level). Therefore, we focus on offering net carbon-neutral mobility solutions as soon as possible.

Besides this, the European Athlon eMobility programme supports customers in their transition to a fully electric

fleet, and we collaborate with Mercedes-Benz Mobility to make our own employee fleet net carbon-neutral. We put a strong emphasis on zero tailpipe emissions by using fully electric vehicles, and compensate for unavoidable emissions. Our Athlon markets are gradually adopting fully electric car policies, and we are currently redefining our Athlon travel policy, with fewer flights and more train (and EV) travel, and focusing on rethinking our customers' and employees' mobility habits every day. Overall, we follow the 'Avoid - Reduce - Compensate' strategy.

Mercedes-Benz Group - Ambition 2039

The Mercedes-Benz Group aims for net carbon-neutrality along the entire value chain in their fleet of new vehicles in 2039. In 'Ambition 2039', Mercedes-Benz stipulates specific aims and intermediate milestones, like reaching the half-way mark by 2030. The company aims to at least halve CO₂ emissions per passenger car over the lifecycle by the end of this decade compared to 2020 levels.

The net carbon-neutral goals of the Mercedes-Benz Group include the entire automotive value chain: from technical development and the extraction of raw materials to production, service life and recycling. We are determined to contribute to climate protection and air pollution control. To strengthen that commitment, 'Ambition 2039' has become a core element of the sustainable business strategy of the Mercedes-Benz Group. For example, the fleet of new vehicles should be net carbon-neutral (over their entire life cycle) by 2039. In 2022, all own vehicle production locations attained a net carbon-neutral production process: an important first milestone. This was partly achieved through the purchase of green electricity.

Since Athlon is part of the Mercedes-Benz Group, we follow its ambition. At Athlon, already 70% of the energy we use comes from renewable sources, and we are gradually replacing all our non-sustainable energy contracts. In 2022, we compensated for our CO₂

emissions from 'grey' electricity through CO₂ credits (MBM Green Office Project 2022).

SBTi Commitment

Mercedes-Benz Cars & Vans had its climate protection targets scientifically verified by the Science Based Targets initiative (SBTi) in 2019. This makes it clear that the adopted targets are aligned with the Paris Agreement and the latest findings of the scientific community.

These are the SBTi-verified targets of the Mercedes-Benz Group:

- A (more than) 40% reduction of the greenhouse gas emissions of the new vehicle fleet at Mercedes-Benz Cars & Vans during the vehicle use phase (well-to-wheel) by 2030, as compared to 2018.
- 50% reduction as compared to 2018 of CO₂ emissions and energy purchases (Scope 1 & 2) at our Mercedes-Benz Cars & Vans plants worldwide by 2030.



**EVERY
ACTION
COUNTS**

#ambition2039

Athlon's Five-Step Mobility Plan

Athlon has a travel policy. We encourage our employees and customers to approach every trip based on our Five-Step Mobility Plan.

1. Start by asking

"Do I need to travel?"

While technological advances like video calling have changed the world forever, there are still situations that call for time spent face-to-face, for a brainstorm, for a handshake, for a helping hand. It's worth thinking about when, where and how you need to go; because there might be times that showing up over a video call might be suitable, while other times you just really need to see someone in person.

2. Choose the best mobility option for your trip.

Still need to travel? Now it's time to consider how to get there. Whether you're facing a shorter or a longer journey, we can help you pick the best and most planet-friendly option for your trip. Whether that's by bike, car, train, or plane, for instance. At Athlon, we like to think about and advise on choosing the smartest mobility option for each individual journey. Considering an alternative to your go-to mode of travel can save you money, time, effort and carbon emissions.

3. Going by car? Go electric.

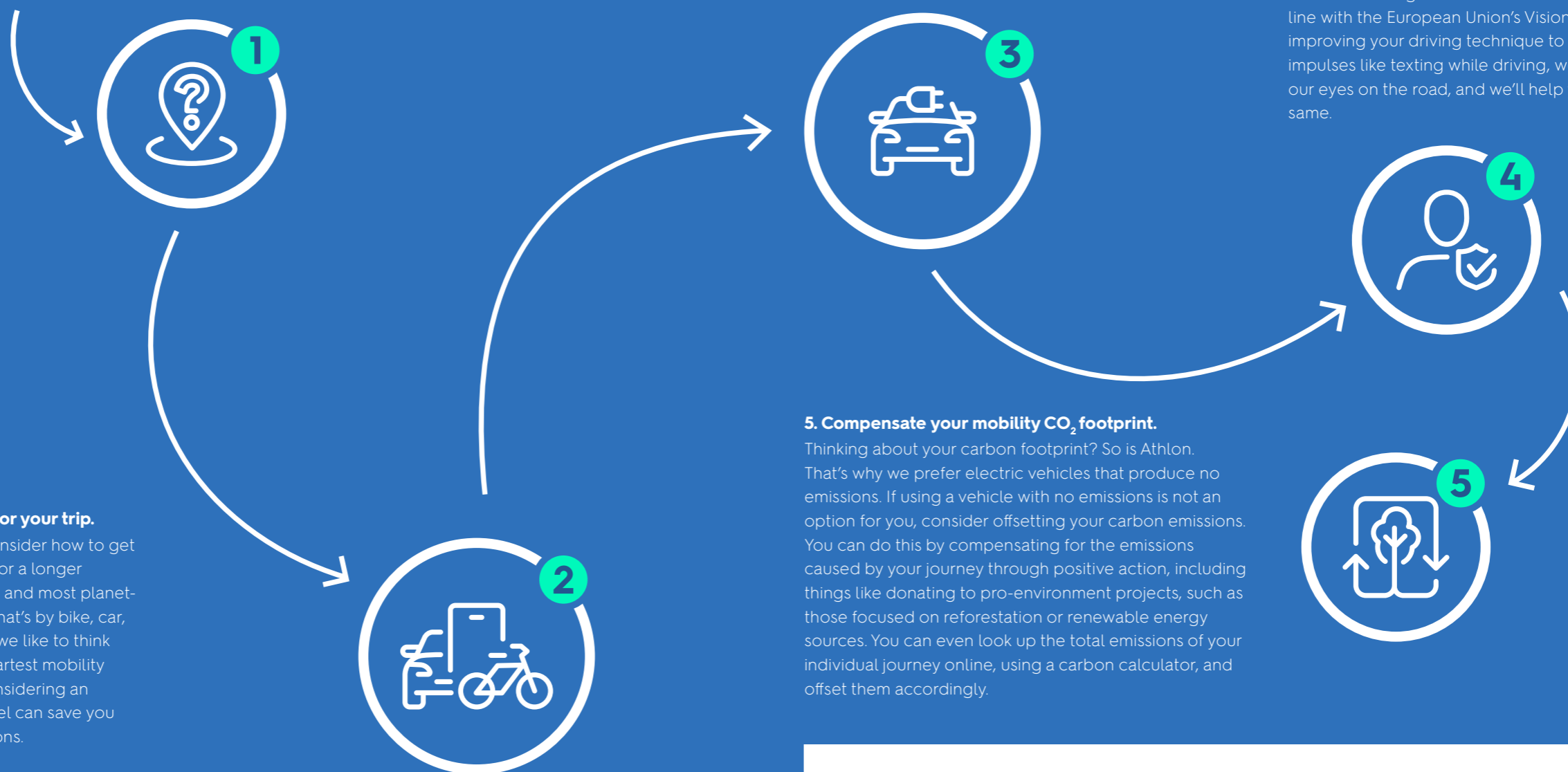
If you're travelling by car, go electric. Going electric can get you there in a way that puts the planet first. But equally important is the fact that going green could be a good option in terms of cost. Did you know that the total cost of ownership of an electric vehicle is now moving closer to that of a traditional car? Our ambition at Athlon is to make our entire fleet fully electric. As a multi-brand lease company, we can help you transition to an electric vehicle.

4. Whatever your choice, travel safely!

Being safe on the road is not only good for yourself, but also for the safety of others. Our drivers, passengers and fellow road-users take precedence, because we target zero road fatalities by 2050, in line with the European Union's Vision Zero. From improving your driving technique to overcoming impulses like texting while driving, we always have our eyes on the road, and we'll help you do the same.

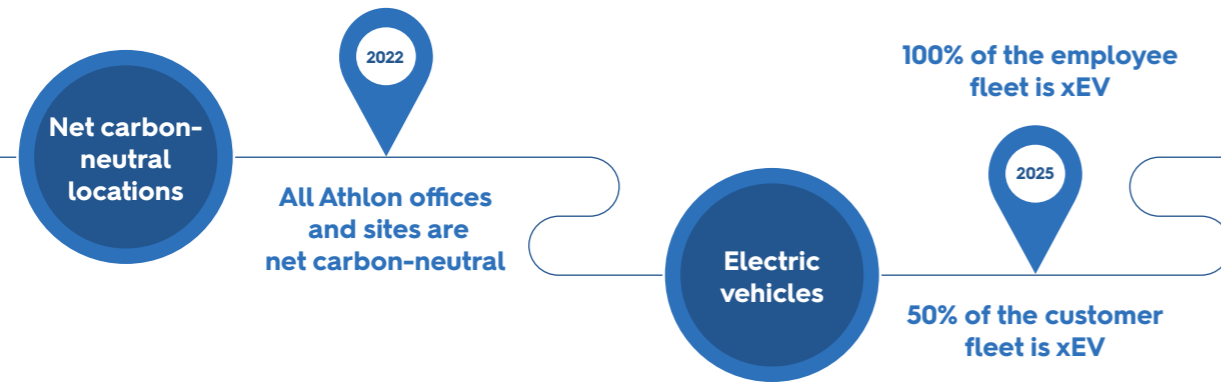
5. Compensate your mobility CO₂ footprint.

Thinking about your carbon footprint? So is Athlon. That's why we prefer electric vehicles that produce no emissions. If using a vehicle with no emissions is not an option for you, consider offsetting your carbon emissions. You can do this by compensating for the emissions caused by your journey through positive action, including things like donating to pro-environment projects, such as those focused on reforestation or renewable energy sources. You can even look up the total emissions of your individual journey online, using a carbon calculator, and offset them accordingly.



Rethinking our travel behaviour

The general Athlon Work from Home policy allows 50% remote work to reduce commuting. Several markets allow even more remote working, which makes the creation of strong teams more challenging. In these cases, special attention to teambuilding, engagement and connection is required. Our motto is: work from home and meet at the office. We expect our people to really engage with each other when they are at the office and to perform tasks that require individual focus at home. This requires a change of mindset and has become a part of our Diversity, Equity and Inclusion strategy.

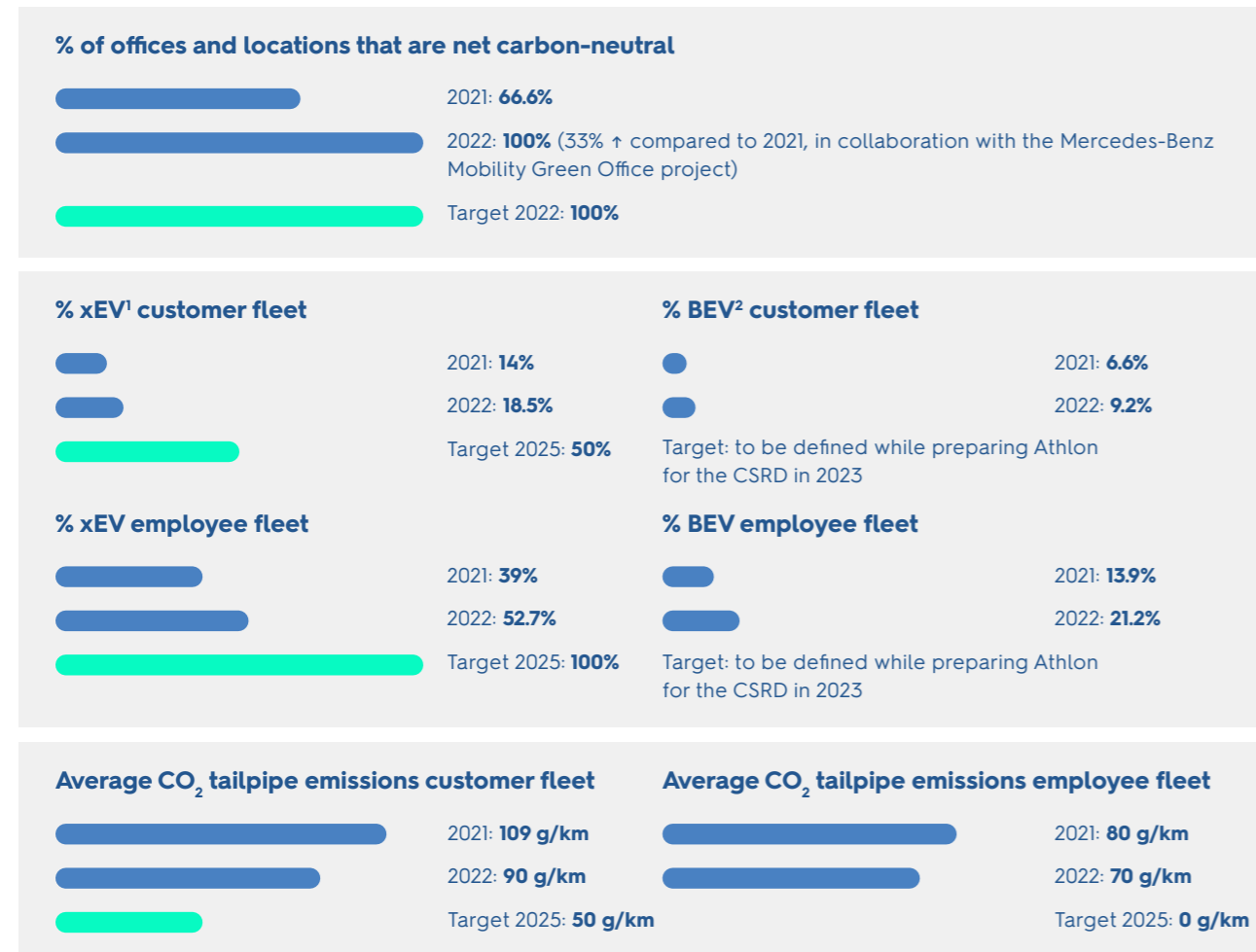


Our Climate Action targets and commitments

By 2025:

- 50% of the Athlon customer fleet is BEV or PHEV(xEV)
- 100% of the employee fleet is entirely BEV or PHEV(xEV)
- the average CO₂ tailpipe emissions in our customer fleet are 50 g/km
- the average CO₂ tailpipe emissions in our employee fleet are 0 g/km

KPIs



¹ Entirely or partly electric vehicles ² Battery electric vehicles

Our progress

Customer fleet

In 2022, our customer fleet was composed of 18.5% BEV or PHEV (xEV) (compared to 14% in 2021). The increase was not as high as we expected, and additional measures are needed to achieve our 50% target in 2025. In 2023, we will have to step up our efforts and reach 25% xEVs in our fleet. Due to the increase of xEV vehicles in the fleet, the average CO₂ tailpipe emissions per vehicle also dropped from 109 g/km to 90 g/km. To meet our goal, we need to safeguard the supply of these vehicles, especially since microchips remain scarce. That is why we have created a new role within our procurement department, which concentrates only on strategic electric procurement. This will increase our expertise and help our customers in their journeys toward fully electric fleets.

Employee fleet

Regarding our employee fleet, 52.7% was entirely or partly electric in 2022 (compared to 39% in 2021). Due to the increase of xEV vehicles in the fleet, the average CO₂ tailpipe emissions per vehicle also dropped from 80 g/km to 70 g/km. Again, we need additional efforts to reach our target of 100% xEV by 2025. In order to meet our goal, we have created a new working group that concentrates on a full electric mobility policy on Group level. This will increase the electrification rate in both our employee fleet and our customer fleet.

In 2022, 9.2% and 21.2% of our respective customer and employee fleets consisted of fully electric vehicles.

All Athlon markets offer their employees a Mobility Budget, granting them access to various mobility options such as a company car, taxis or the use of public transport. Since we have a lot of experience in this matter, we are well-placed to advise our customers on similar measures. This contributes to Athlon's core activity: guiding our customers toward a greener fleet.

Since 2022, our own Athlon employee fleet has been net carbon-neutral. New BEV-only policies were introduced in several Athlon markets, leading the way for the others. We compensate the CO₂ emissions caused by the electricity consumption of BEVs and the fuel emissions of plug-in hybrid electric vehicles (PHEV) and petrol vehicles by investing in a Gold Standard project. We achieved this target in collaboration with our Mercedes-Benz Mobility colleagues (in the context of the Green Fleet initiative and the Green Office programme).

Our offices and location

In the same context, we succeeded in making all Athlon offices and locations net carbon-neutral. Specifically, we switched to renewable energy as much as possible and compensated for the remaining greenhouse gas emissions on grey electricity.

Actions and initiatives 2022: a selection

Action 1

Epic Electric Experience (Athlon BeLux)

To boost enthusiasm for EVs, Athlon BeLux organized the 'Epic Electric Experience'. That's right: real driving experiences, including fast charging options. Attendees could try out no less than a hundred different EVs. In addition, there were keynotes and specific EV masterclasses, to help customers take the first steps in the electrification of their fleet and reduction of their CO₂ footprint. It was an event that is definitely worth repeating.

Action 2

EQE customer driving experience (Athlon Spain)

How can we help our customers reduce their mobility-related CO₂ emissions? One way is by removing the barriers to electric vehicle uptake. To win their customers over, Athlon Spain invited them to try out an electric car for one week and experience the differences between driving an EV and a fuel car. Afterwards, the participants shared their likes and dislikes. This has given us a clearer view on how we can support customers in their journey to go electric.



Epic Electric Experience (Athlon BeLux)



EQE customer driving experience (Athlon Spain)

Road Safety – Travelling more safely, every day

Why we care

Across the EU, around 26,000 people were killed in road traffic accidents in 2022. If we compare these figures to those of the last pre-pandemic year of 2019, fatalities are 10% lower. This figure should drastically and urgently decrease further. In 2021, the European Commission developed a new strategic action plan on Road Safety and a Road Safety Framework 2021-2030. The action plan, which Athlon supports, targets a 50% reduction in

both road deaths and serious injuries by 2030. With a fleet of approximately 400,000 vehicles, it is our responsibility to contribute to a solution. We do this by encouraging our customers to focus on road safety and on mindful driving. This reduces fuel/energy consumption and – more importantly – it gets people safely to their destination.

Michael Geisinger,
CIO Athlon



“Growing up in a family of health professionals, I learned at a young age what the terrible consequences of unsafe driving can be. As a result, I strongly support a safe driving culture at Athlon. Car manufacturers can add all safety options, but in the end, it’s people’s mindsets that decide whether or not they drive safely. As a mobility provider, we feel socially responsible for enforcing safe driving behaviour. We offer our customers and our employees road safety trainings, and we take our advice to various primary schools near our offices.”

“I advise other organizations to listen to their customers and try to find out how they can help to improve road safety. Encouraging people to choose electric vehicles is a good first step: EV drivers stop more frequently to charge their vehicles, and this improves concentration and relieves stress.”

Our contribution to the solution

In order to make our commitment more specific, we created the Athlon RoadSafety solution in 2022. This proposition includes a promise to the market (connected to the EU Vision Zero strategy) and various driver safety solutions. For example: non-GPS solutions that prevent texting while driving and score the way you accelerate, brake or turn. Or a GPS-based solution that tracks your trips and provides online training based on your driver behaviour, to help you understand your high-risk events on the road. In the end, it is all about creating insights based on your own driver behaviour.

road safety is a strategic topic for HR and at C-level. For this reason, we offer our employees training sessions in which they can start a dialogue on road safety. This measure is especially important, because it helps to induce a change in people’s behaviour. We find this more important than selling separate solutions.

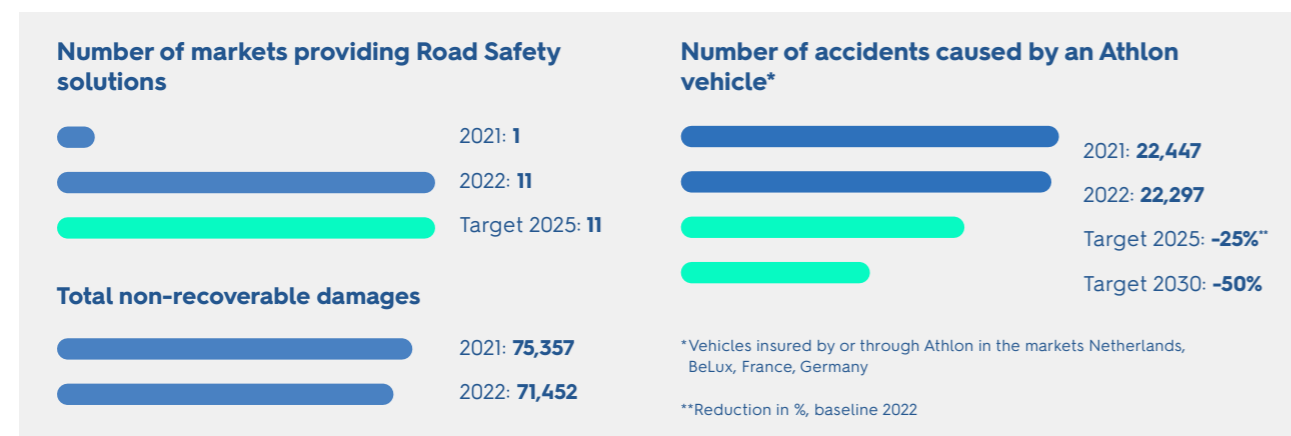
A Driver Safety solution is available in the local language of all Athlon markets. This reduces the barrier to join the safety movement.



Our Road Safety targets and commitments

It is our ambition to reduce the number of road accidents caused by Athlon vehicles to zero. More specifically, we aim to reduce the number of accidents that result in physical injury to the driver or a third party. By 2025, we will reduce the number of accidents caused by Athlon vehicles by 25% compared to 2022. By 2030, we aim for a 50% reduction. Beyond that, we embrace the Vision Zero ambition of the EU, meaning 100% reduction in 2050.

KPIs



Our progress

All Athlon markets have recently followed a Road Safety masterclass. Some markets joined the Group-level training, while others already had their own training programme in place. The goal of these masterclasses was to raise awareness and share knowledge and insights on the topic, so Athlon can initiate a dialogue on Road Safety with customers. We also reached out to the European Transport Safety Council (ETSC), with the aim of working together to change the game in Road Safety. In the next few years, we will pool our efforts to achieve the ambitions of the Vision Zero strategy.

To monitor our progress in reducing the number of accidents, we started collecting data in 2022. Within the number of damages caused by an Athlon vehicle*, we pinpointed the 3 top causes. In 2023, we will improve the data quality for these topics in every Athlon market, in order to be able to monitor them more precisely.

- a) Rear-end collision (NL: 358)
- b) Manoeuvring and parking (NL: 16,858)
- c) No right of way given to third party (NL: 203)

* fleet insured by Athlon

Actions and initiatives 2022: a selection

Action 1

Road Safety training with the Automobile Association (AA) and KwikFit (Athlon UK)

On World EV Day (29 September 2022), Athlon UK organized a Road Safety training with the Automobile Association (AA) and KwikFit, a well-known car servicing and repair company. Our partners from the AA brought complimentary gifts for everyone and offered prizes to attentive listeners. Various experts explained how to limit EV breakdowns and shared their knowledge on general road safety and vehicle standards. They also shared the top reasons for which they are called out to assist EV drivers.

We were joined at our office by our partner KwikFit, who demonstrated what good tyre safety looks like and performed complimentary checks on our car tyres. Throughout the day, a number of information sessions were held, in which KwikFit offered advice on tyre safety. We also had an amazing opportunity to dress up one of our own as the Michelin Man! The day ended with a fun quiz, in which our colleagues did very well. After the training day, Athlon International offered additional coaching that focused on our specific Driver Safety solutions. With this knowledge, Athlon UK can contribute to safer roads in the UK.

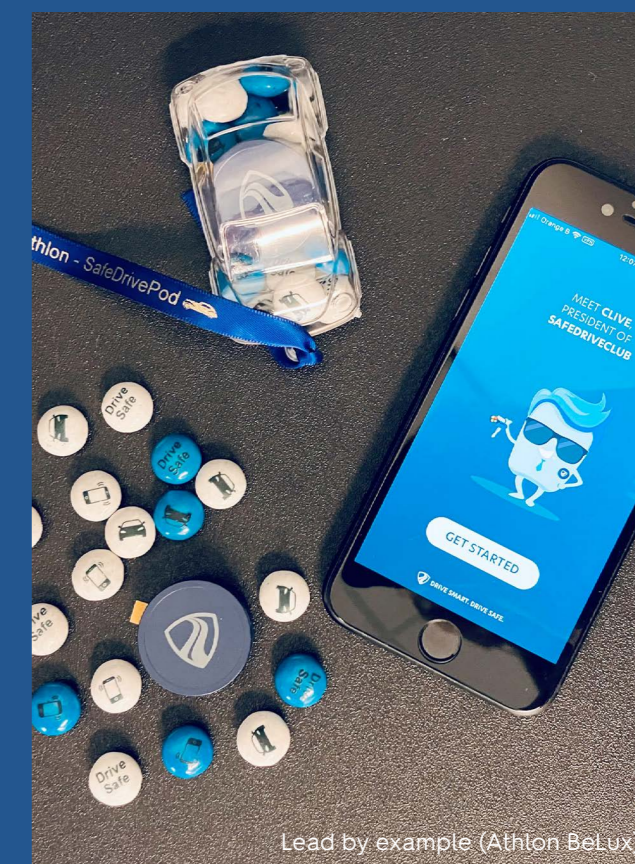
Action 2

Lead by example (Athlon BeLux)

Team Athlon BeLux installed SafeDrivePods in the company cars of all their employees. This solution prevents you from texting while you are driving. The tool was complemented by a mandatory Road Safety training on distractions while driving. The training created a more positive perception of the SafeDrivePods, which resulted in increased employee safety and more open communication about safety experiences. In addition, Athlon BeLux raised money for the organization OVK (Ouders van Verongelukte Kinderen), a charity that helps victims of road accidents.



Road Safety training with the Automobile Association (AA) and KwikFit (Athlon UK)



Lead by example (Athlon BeLux)

Community Engagement – Equal opportunities for all

Why we care

Inequality is still ubiquitous across the world. At Athlon, we are aware that we hold a privileged position in society. By sharing our knowledge and supporting charities with money and expertise, we aim to give something back. We also encourage our people to do volunteer work. The United Nations recognizes

volunteerism as a vehicle for sustainable development: volunteers facilitate changes in mindsets by raising awareness and inspiring others. Our goal is to have a positive impact on society, and to give more opportunities to less fortunate people.

Christian Rottenkolber,
CFO Athlon



“Companies that only focus on making money are rapidly becoming outdated. They are not sustainable, and not very attractive to potential customers or employees. At Athlon, profitability goes hand-in-hand with social engagement and giving something back to society. This works best if you stay close to your core business. For example, during the COVID-19 pandemic, we provided healthcare professionals with electric cars to ease their commute. In addition, all Athlon employees are allowed to spend two days per year on volunteer work, such as creating shelters for Ukrainian refugees or sending first aid kits to Ukraine.”

“I strongly advise other organizations to lead by example. Don't act out of guilt or to become more attractive, but commit yourself to a purpose and inspire others with your behaviour. Always start from your personal motivation to make the world a better place. By combining professionalism with enthusiasm, you can create a grateful and positive working environment.”

Our contribution to the solution

We have decided to share our knowledge and experience to strengthen the communities that we are part of. We aim high: to have a positive impact on health and safety, and to improve the quality of life in specific areas. By reaching out to others, we will also deepen our understanding of the changing world and strengthen our Employer Value Proposition.

their knowledge and experience about mobility, climate action and equal opportunities with the wider community. In addition, we launch initiatives to give children and adolescents from less favourable backgrounds a fair opportunity to progress. We always opt for structural collaborations with experienced partners.

Athlon's social purpose goes beyond profitability and job creation: we also aim to have a positive impact on the communities around us. For that reason, we support charities with knowledge, volunteering hours and money. We are especially motivated to share our expertise in sustainable mobility. Our volunteers share

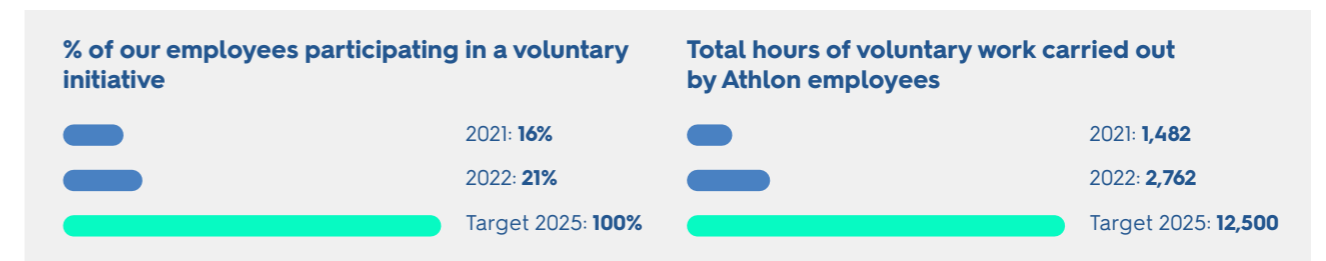
To make it easier for Athlon employees to spend their volunteer days on a cause they relate to, some markets work with an Athlon Social Impact platform. This platform lists all the possible volunteer activities. Other Athlon markets work closely with local volunteer organizations or organize their own annual activities.



Our Community Engagement targets and commitments

By 2025, we would like all Athlon employees to actively participate in a volunteering programme. We also encourage all our employees to do volunteer work for 2 days per year. At least half of those volunteer days will be devoted to equal opportunities.

KPIs



Our progress

The Athlon Social Impact programme allows our employees to perform 2 days of volunteer work per year (paid for by Athlon). In 2022, we added 3 extra days to allow our people to help Ukrainian refugees. In the same year, 2,912 hours of volunteer work were performed across the entire Athlon Group. This was done by 370 employees (i.e. 21% of the workforce). Our goal is to contribute 12,500 hours of volunteer work at Athlon by 2025. To reach this goal, this impact area will be afforded greater focus in the coming years.

During our first years of encouraging volunteer work, we have learned that people put in more hours if we make it easier for them to get started. Group initiatives also work very well, especially in combination with a teambuilding activity.

Each Athlon market is free to cooperate with a local charity or to join Group-level initiatives. In 2022 for example, we collected first aid kits from end-of-lease cars and donated them to Ukraine through our Polish colleagues.

Athlon Netherlands has long been a frontrunner in this impact domain. In collaboration with GoodUp, they created the Athlon Social Impact platform that gathers and presents information on all the voluntary programmes we support. The platform is currently available to employees of Athlon Netherlands and Athlon International, and over the next few years more markets will join the system. We will also make it possible to share ideas through an online network, so employees from different locations can support the same goal.

Actions and initiatives 2022: a selection

Action 1

Mercedes V-Class for SOS Kinderdorf (Athlon Germany)

In 2022, Athlon Germany donated the use of a Mercedes V-Class for 2 years to SOS Kinderdorf in Düsseldorf. The aim: to help SOS Kinderdorf with their mobility. By combining our mobility expertise with doing good for society, we connect to the core values of Athlon.

Action 2

Athlon supports Ukraine (Athlon Poland and others)

To support Ukraine during the war, Athlon allowed all employees 3 extra days of volunteer work in 2022. Coordinated by Athlon Poland, we also offered other types of assistance to war victims. For example, we offered/donated:

1. Psychological support for children;
2. Art materials and sensory aids for children;
3. Medical aid accessories for civilians affected by the war.

In addition, several Athlon markets collected first aid kits. In the Netherlands, many colleagues spent a few days volunteering at the Ukraine Crisis Centre. Athlon Spain collaborated with the local Red Cross, and other locations raised money and/or collected clothes and blankets to donate. Finally, Athlon as a whole pledged €50,000 to the Dutch charity Giro 555, dedicated to support people from Ukraine.



Mercedes V-Class for SOS Kinderdorf (Athlon Germany)



Athlon supports Ukraine (Athlon Poland and others)

Vital People – Healthy and vital employees

Why we care

The engagement and commitment of our 2,000 people is key to our company’s success. In return, we feel responsible for their health and wellbeing. Why? Because fit and healthy people are happier and more resilient. They perform better, are less frequently ill, and

create a positive work atmosphere. As such, they enhance our company’s resilience and our capacity to face challenges in a flexible way. And a healthy organization is more capable of dealing with a rapidly changing world like the world of mobility.

Margareta Nussbaum,
Vice President (VP)
HR Athlon



“Our people are the key to our success. At Athlon, we focus on balancing financial, physical and mental health in order to create happy and satisfied employees who are able to adapt to our changing world. To protect people’s health and wellbeing, we start from a personal approach. For example, we provide ‘health coaches’. Providing a positive work environment is the best way to make sure people keep learning and developing.”

“In order to know what your employees need, and which challenges they face, you simply need to listen to them. Especially in times of change, it is important to focus on what they need. All companies have their own way of protecting health and wellbeing, but the most important aspect is to offer support to those who need it.”

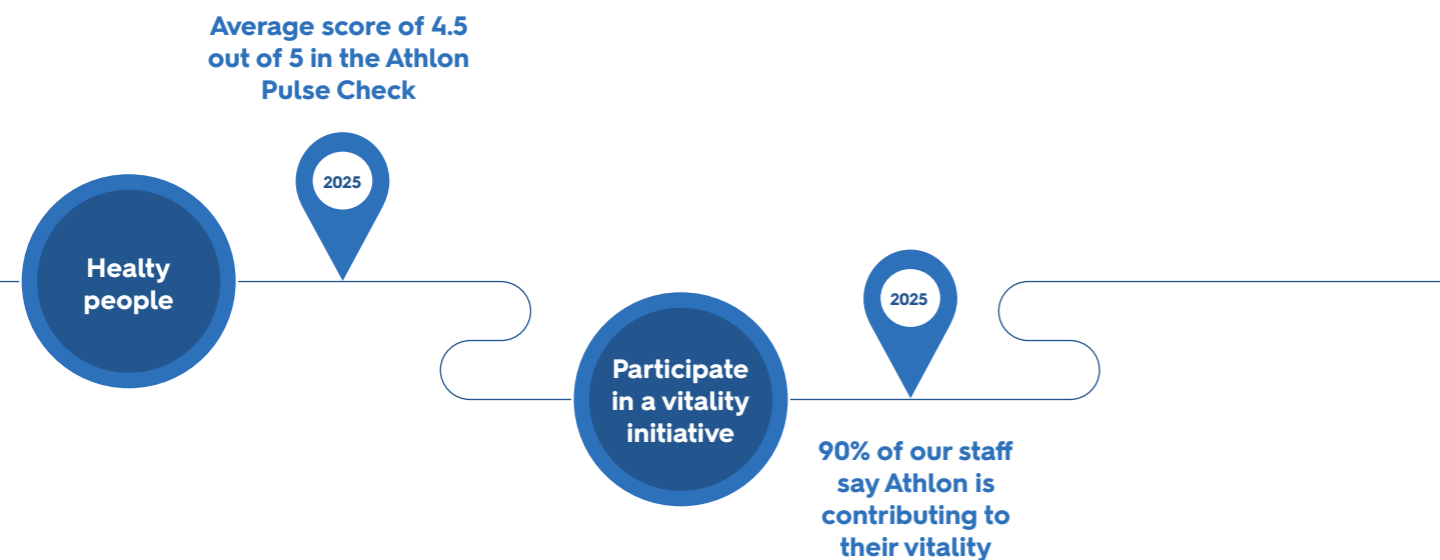


Our contribution to the solution

Athlon supports employees who struggle with stress in the workplace. But how? We encourage flexible working hours, facilitating this with a concrete work-from-home policy, and help people to achieve a good work-life balance. Wellbeing is an important part of our company culture. We facilitate an open dialogue, take measures to reduce stress, and always try to have fun. Employee surveys show that this makes us an attractive employer. Our goal is to offer ‘work that works for our people’ and to keep them fit and healthy.

We aim to launch an Athlon Vitality Programme in all the countries in which we operate. This programme will encourage our employees to:

- Improve their physical health condition (exercise, healthy food, workplace attitude);
- Increase their mental resilience (more sleep, coping with work pressure, relaxation);
- Achieve a better work-life balance (company culture, remote working policy, setting boundaries).



Our Vital People targets and commitments

Athlon strives for an annual increase in employee satisfaction. By 2025, we aim to achieve an average score of 4.5 out of 5 in the annual Athlon Pulse Check survey. We also aim for 90% of our employees saying that Athlon contributes to their vitality.

KPIs



Our progress

To monitor our progress in employee satisfaction, we conducted an online Athlon Pulse Check survey in 2022. This resulted in an average score of 3.6 out of 5, which is 6% higher than in 2021. We believe we can do better: our goal is to achieve a score of 4.5 by 2025.

The Athlon Pulse Check is a part of internal group meetings, at both local and Group levels. In 2021, Athlon International has defined a new set of survey questions to gain insights in the health trends of employees, with data collection that started in 2022.



Athlon Vitality Programme (Athlon Netherlands – Athlon International)



Welfare for All Programme (Athlon Italy)

Actions and initiatives 2022: a selection

Action 1

Athlon Vitality Programme (Athlon Netherlands – Athlon International)

In 2019, Athlon Netherlands started a Vitality Programme for its own employees and the employees of Athlon International. A group of 15 Athlon 'vitality captains' works on this programme every month. They have developed an annual Vitality Plan and are launching a wide range of activities. In 2022, there were individual health checks, the participation in the Almere City Run, a stress impact training with the help of VR glasses, healthy food weeks in the restaurant, a reanimation course during the Week of the Heart, and much more.

Action 2

Welfare for All Programme (Athlon Italy)

Team Athlon Italy started a Welfare for All Programme to increase employee wellbeing. The programme includes:



Welfare

The welfare plan for Athlon employees aims to support people's purchasing power and give access to goods and services that meet individual and/or household needs. On a voluntary basis, employees are able to convert part of their Performance Bonus (up to €3,000) into a welfare credit, which they can freely use for various services, in accordance with the provisions of current legislation and with reduced taxation. Services include shopping vouchers, fuel, mortgages, sport, wellness, travel, culture, education, family care services, public transport, social security and healthcare. We have a portal where services/bonuses can be chosen.



CRAL

Athlon – as part of the Mercedes-Benz Group – has been given the right to join the CRAL (Circolo Ricreativo Aziendale dei Lavoratori - Workers' Corporate Recreational Club) of Mercedes-Benz Italy. With a small contribution of €5 per month, employees can access many recreational, cultural, touristic, sporting, gastronomic, social and welfare activities both for employees and for friends and relatives. From 2023, relatives will also be able to register directly and enjoy these benefits. Opportunities include concerts, exclusive events and reserved tickets at discounted prices.

Diversity, Equity and Inclusion on the work floor

Why we care

As a company, Athlon aims to reflect society. We want to make a diverse range of talented people feel welcome and at home, regardless of their worldviews. Differences between people are viewed as opportunities for growth and development, both for our individual employees

and for our company. So we encourage our employees to be themselves and to share different insights or cultural models. Being a diverse and inclusive company also gives us a competitive advantage: it allows us to better serve our customers from various backgrounds.

Youssef Saidi,
VP Legal



"My journey in Diversity, Equity and Inclusion (DEI) started after obtaining my university degree. I wanted to dedicate myself to equal opportunities, and support children who drop out of school because of unfavourable circumstances. Life is not only about your own choices and development, but also about people opening the right doors for you."

"In 2022, we created the DEI Changemakers network, a Diversity, Equity and Inclusion Network on Group level. The network includes ambassadors from all our markets. In this way, we create awareness, improve our recruiting and hiring processes, and embrace the change of mindset within our organization. Alongside this, we also started an International DEI Core team in order to support the Group level network as much as possible."

"I would advise other companies to acknowledge the unconscious bias that is present in every organization, and to take action to deal with this. Start with hiring the right leaders, and counting on them to hire the best and most diverse teams for your company."

Our contribution to the solution

Our Diversity, Equity and Inclusion (DEI) strategy focuses on:

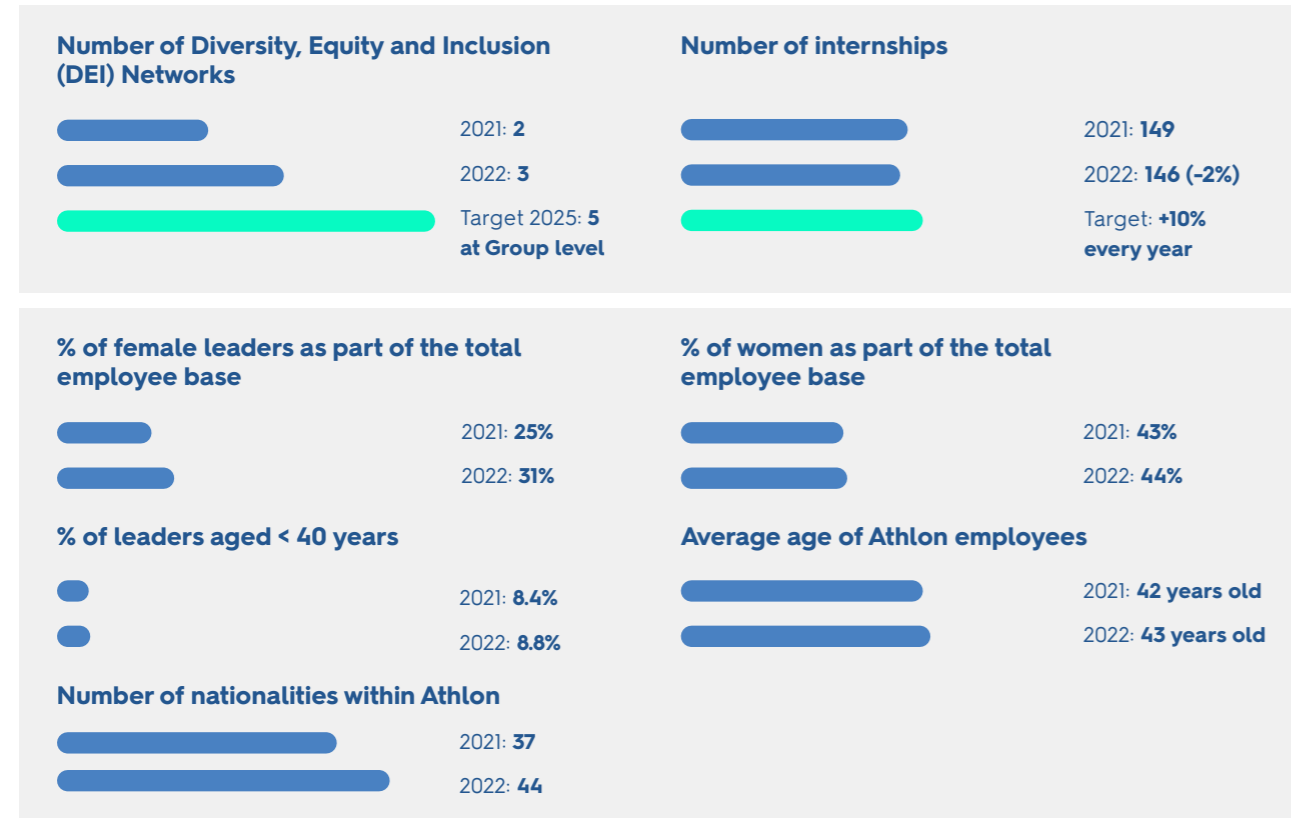
- Culture: to truly learn from one another, we are strengthening our company culture and placing greater emphasis on people and good leadership. By communicating openly, we learn to get along with one another and behave in accordance with our company values.
- Work-life balance: a good balance between work and private life contributes to diversity and inclusion. That's why we focus on commitment, trust, mentorship, smart working methods and flexible working conditions to allow for all kinds of family situations.
- Generation management: to stimulate innovative and creative working methods, our teams are made up of people of different ages.



Our Diversity, Equity and Inclusion targets and commitments

We ensure that all Athlon teams reflect the local communities of the countries in which they work. By 2025, we will set up at least 5 thematic networks on diversity and inclusion, which will focus on exchanging knowledge and mutual inspiration.

KPIs



Our progress

In terms of Diversity, Equity and Inclusion, our main target is for all Athlon teams to reflect their local communities. In 2022, we also started an international DEI Changemakers network. Every Athlon market is represented, and together we have co-created an annual DEI plan. In 2023, we will work on a DEI statement and on our recruitment processes. Furthermore, we will organize a group-wide Diversity, Equity and Inclusion Week in May 2023. The main goal is still to create awareness, since DEI is a broad topic with a lot of possible interpretations. With a live webinar with Athlon Board members, a masterclass on unconscious bias, a masterclass about allyship and several local initiatives, DEI will become a part of our normal way of working together.

We will monitor several indicators to manage our progress in this domain. The first two focus on gender: the percentage of women in our total employee base (44% in 2022), and the share of female leaders (31% in

2022). To better reflect the local community, we also want to increase the number of younger employees. In 2022, 8.8% of our leaders were aged under 40.

As a fourth KPI, we want to raise the number of internships within Athlon by 10% each year. In 2022, this number was approximately the same as in 2021: we welcomed 146 interns. We need to encourage our leaders to increase the number of internships in 2023. In this way, we want to offer opportunities to promising students who aspire to a career in sustainable mobility solutions. In turn, these young people stimulate our innovation.

A final indicator concerns our Diversity, Equity and Inclusion Networks. By 2025, we will set up at least five thematic networks on Diversity, Equity and Inclusion. These networks will focus on exchanging knowledge and mutual inspiration.

Actions and initiatives 2022: a selection

Action 1

Job seeking skills for young people isolated from the labour market (Athlon Netherlands)

Applying for a job is not only a matter of skills or degrees, but also of knowing the right procedures. Several Athlon volunteers offered to coach young students in job seeking skills, for example by teaching them how to do a job interview, or how to apply for an internship. Many youngsters never receive any guidance in such matters. Practicing these kinds of interviews helps them to prepare for challenges in real life.

Action 2

Diversity quiz to raise awareness (Athlon Germany)

Team Germany used Diversity Day 2022 as an opportunity to make DEI more accessible to their employees. To adopt a fun approach, they decided to organize a quiz. The choice fell on an online quiz by the Charta der Vielfalt, a corporate initiative that promotes diversity in companies and institutions. Athlon Germany has been a member of the Charta der Vielfalt since 2019.



Job seeking skills for young people isolated from the labour market (Athlon Netherlands)



Diversity quiz to raise awareness (Athlon Germany)



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05

Corporate governance

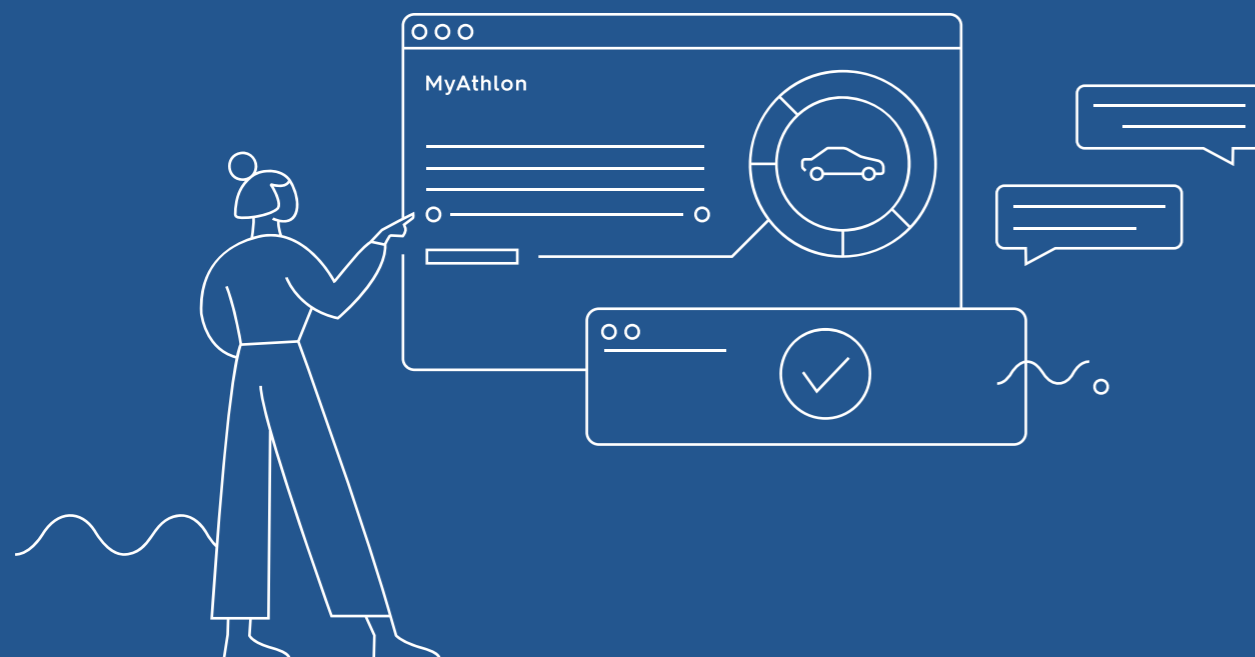
Our corporate governance standards have been established in accordance with the Universal Declaration of Human Rights, the Global Compact of the United Nations, the Guidelines for Multinational Enterprises of the Organization for Economic Co-operation and Development (OECD), and the conventions of the International Labour Organization (ILO). We apply these standards – which concern labour arrangements, business ethics, environmental protection and safety – to all our business operations. To implement these standards, we rely on our Integrity Code, our Principles of Social Responsibility and our environmental and energy policies.

Athlon has also developed a 'Declaration on the Principles of Sustainability and Corporate Social Responsibility'. This describes who we are as an organization, what we stand for, and what our commitments are toward our customers and society. It concentrates on our 5 most important impact areas and on our contribution to the UN Sustainable Development Goals (SDGs). In addition, our Code of Conduct guides us in how we want to do business with our customers and our suppliers. It includes guidelines on topics such as corruption, anti-bribery and fair competition. The Code of Conduct is based on the Mercedes-Benz Integrity Code and the Mercedes-Benz Supplier Sustainability Standards, and applies to the entire Athlon Group.

Data protection

In today's digitized world, data is key for both our customers and our internal organization. Athlon's data protection plan is based on the European Union's General Data Protection Regulation (GDPR)

and applies to every Athlon market. On the basis of Article 17.2 of the GDPR and the Global Data and Information Policy, data protection is an integral part of our business operations.



Our policies

Athlon International Code of Conduct

We build relationships based on trust. We condemn and punish any sort of activity related to bribery, both giving and accepting. A copy of our Code of Conduct is attached to this Sustainability & CSR Impact Report 2022.

Our Integrity Code

We strive to comply with business ethics at a Group level. Our Integrity Code encourages ethical conduct, business honesty, integrity, and best practices. We have strict corporate guidelines concerning corruption, bribery, compliance with laws and regulations, fair and free competition, and similar matters.

Four-eye principle and Segregation Policy

The four-eye principle means that certain activities, like important decisions or transactions, must be approved by at least 2 persons. It goes hand-in-hand with a segregation of duties. This refers to the notion that no employee should be in a position to commit or conceal fraud or errors in the usual course of their duties.

We also use segregation principles to safeguard our organization from possible damage caused by illegal activities. The whole Mercedes-Benz Group aims to reduce the risk of fraud and improper business conduct. Each local management body is responsible for maintaining its own internal control systems and applying segregation principles.

Mercedes-Benz Anti-Money-Laundering (AML) Policy

We have measures and rules in place to prevent money-laundering activities. Our precautions help us to rapidly identify risks and act on them to reduce potential damage to the company.

Global Data and Information Policy

Information security and data protection are very important to Mercedes-Benz, especially considering the high number of stakeholders we deal with every day. We ensure that our data are used and stored correctly, as data breaches and data misuse can cause legal damage to our organization and customers.

Health and Safety Policy

At Athlon, the health and safety of our employees is of the utmost importance. Our policy on this issue outlines our responsibilities and provisions. It is communicated to all Athlon entities, and is the basis for our actions on employee health and safety.

Work-from-Home Policy

We provide our employees with a hybrid working schedule that allows them to work from home or come into the office. During the COVID-19 pandemic, Athlon International was one of the first companies to switch to this working model. We have made remote work a part of our company culture to ensure that our employees have the flexibility to balance their work and personal lives.

Global Travel Policy

Even in this remote-working world, business trips are sometimes a necessity. By making sustainable travel choices, we try to limit our environmental footprint as much as possible. Our guidelines are described in our Global Travel Policy, which applies to the entire group. Based on the insights of our 2022 carbon footprint, we will work to further develop and adjust this policy.

Undesirable Behaviour Protocol – works council

We do not tolerate workplace harassment and we take measures to raise awareness among our employees to eradicate this. If a problem does arise, our Undesirable Behaviour Protocol outlines which cases should be reported, and how our people can report them.

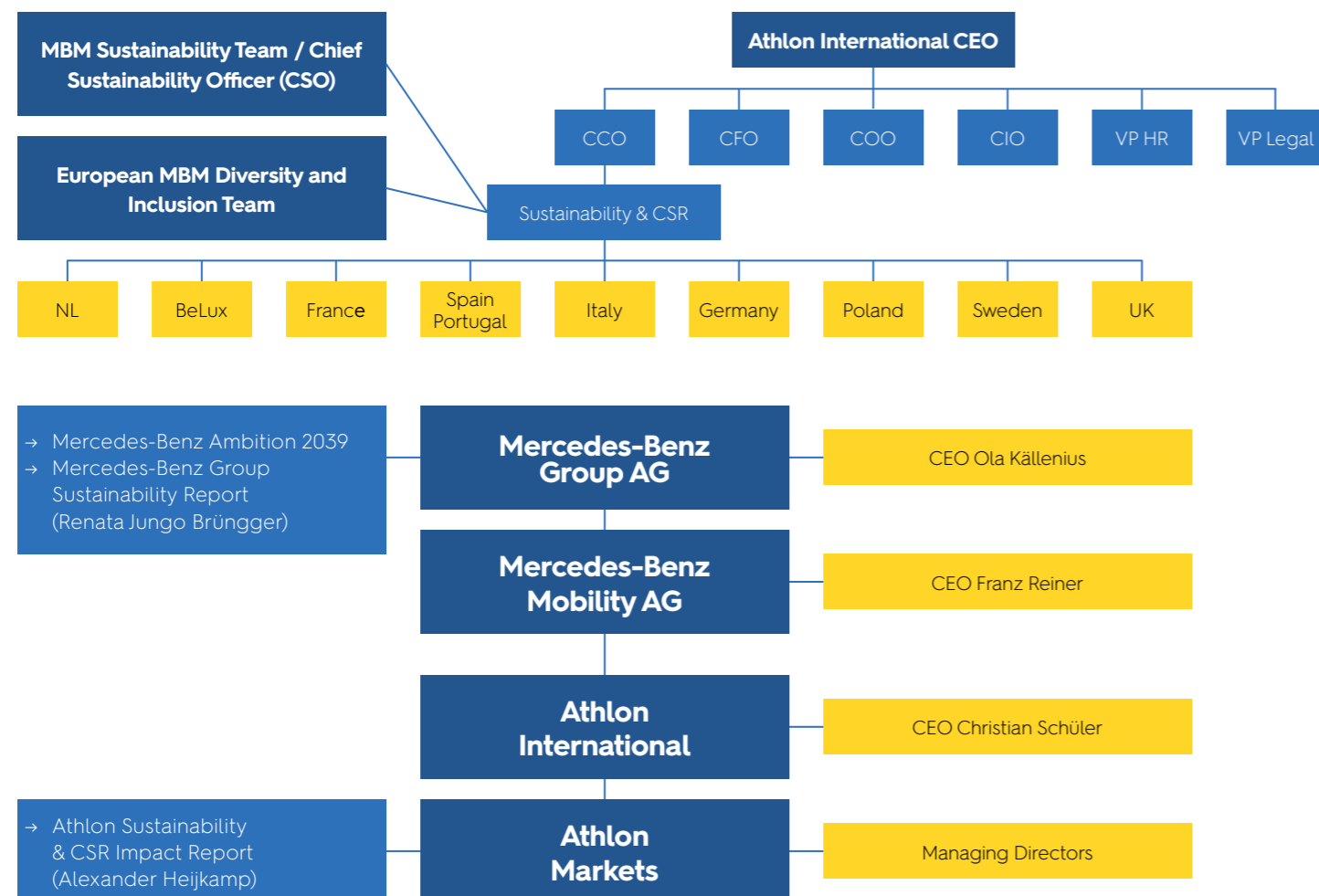
Whistleblower policy and proof of BPO (Business Practice Office) role

Athlon has a whistleblower policy and procedure in place to report illegal activities. The policy clarifies which kind of activities should be reported and to whom for both internal and external stakeholders. It is a way for employees, suppliers and customers to report misconduct or actions that are in violation of the law and/or Code of Conduct.

Our Sustainability & CSR governance

Switching to sustainable mobility is one of the biggest challenges of our times. Challenging, but not impossible: the necessary transition from a traditional leasing company to a sustainable and innovative mobility provider can be achieved in every Athlon market. For an optimal result, we approach Sustainability & CSR both locally and on Group level. Since not every Athlon market is big enough to appoint a local Sustainability & CSR Manager, extra group support is available. Athlon International also cooperates closely with departments like Business Development and Marketing, but also with HR, Operations and Procurement.

Our sustainability approach is part of our close collaboration with Mercedes-Benz Mobility AG and Mercedes-Benz Group AG. Athlon International's Sustainability & CSR Director is responsible for maintaining the internal network within the group and for sharing knowledge and information with local Athlon markets. They are a part of the sustainability team within MBM, and a Diversity and Inclusion (D&I) lead member of the Global MBM DEI Team. In this way, we are building a learning network within Athlon.



Knowledge-sharing networks

In 2022, we started several knowledge-sharing networks for Sustainability & CSR ambassadors from all Athlon markets. The main goal of these networks is to share our sustainability knowledge on a large scale, in order to speed up the Sustainability & CSR movement both within and outside Athlon. All networks have targeted a steep learning curve.

Some markets have appointed a full-time employee for this task; others have created a 50% FTE position or asked an Athlon employee to incorporate this task alongside their current duties. In smaller markets, the Managing Director has often taken the opportunity to join the knowledge network themselves. On Athlon's Social Intranet, we have created a Sustainability & CSR information page, with specific deep-dive pages for each impact area. All Athlon markets are asked to create

interaction through this internal communication platform.

The Athlon Learning Platform was launched in November 2022, at the Fleet Europe Summit in Dublin. At this meeting, several customers were invited to join discussions on 3 sustainability impact areas:
 → Climate action
 → Electrification, flexibility and Road Safety
 → Driver safety solutions and change programmes

The insights of these kick-off meetings were summarized in an Athlon Learning Platform Knowledge Paper, which we shared with all participants in Q1 of 2023. Since learning together is a continuous process, we will invite various customers to join us again soon.



Toward a sustainable supply chain

Athlon encourages its suppliers to take responsibility for their part of the supply chain. When initiating or continuing a cooperation, we always take the supplier's sustainability performance into account. Furthermore, we have created specific standards and declarations to inspire, engage and monitor our supply chain partners. We are pleased to see that many of our suppliers are also highly committed to Sustainability & CSR goals, which strengthens our cooperation.

Mercedes-Benz Responsible Sourcing Standards

Since November 2020, Athlon has required every supplier to commit to the Mercedes-Benz Responsible Sourcing Standards (formerly known as the Sustainability Supplier Standards). These standards include supplier requirements regarding human rights, labour standards, business ethics, environmental protection and safety. They are used worldwide and apply to both product suppliers and service providers. The Sourcing Standards are incorporated into all our contracts with suppliers. Our compliance officers are continuously working with the procurement department on this topic. An open dialogue with our supply chain partners is needed to be able to co-create new sustainable solutions.

Suppliers are required to share the contents of our Sourcing Standards with their own providers, and ask them to uphold the same standards. In this way, our sustainable approach spreads throughout the entire supply chain. Athlon approaches the supply chain with a clear focus on Car-Related Procurement and Non-Car-Related Procurement.

Certification

Athlon aims to make the world a better place on a daily basis; not only in terms of climate protection, but also regarding people and society. We have defined a clear vision, mission and strategy to fulfil this ambition. As always, however, the proof is in the pudding. By having our actions certified, we stimulate ourselves to keep improving, and to set new and more ambitious goals every year. Various certification processes also allow us to learn from other organizations and to join forces with customers and suppliers. Together, we can speed up the movement.

Over the past few years, we have obtained several Sustainability and CSR certificates, both at Group level and in our local markets. We intend to keep up the good work and to improve our performance every year, in order to acquire an EcoVadis certificate for our local markets.

Athlon Markets – Athlon International/Group level: EcoVadis (Bronze)

Our Group level score improved from 46 to 58 points. The biggest improvements occurred in the Sustainable Procurement pillar (score increased from 30 to 60) and the Environment pillar (score increased from 50 to an incredible 80). The Labour and Human Rights Pillar was awarded with 50 points. Our goal in 2023: to achieve a Silver medal (≥ 59 points). To achieve this, we will focus on working hard to improve reporting and coverage in the Labour pillar (the heaviest-weighted pillar).

- Athlon Netherlands: EcoVadis (Gold)
- Athlon Netherlands: FIRA Netherlands
- Athlon Belgium: SDG Pioneer Belgium
- 2023: Athlon France EcoVadis assesment planned



Athlon GO! Green team wins Global Mercedes-Benz Excellence Award 2022

For the first time in our history, Athlon was the winner of a Mercedes-Benz Mobility Excellence Award. Team GO! Green (Ariane Geypens, Ronald van Slooten and Alexander Heijkamp) was recognized for being a frontrunner in raising awareness around the topic of eMobility. Spreading the word about Athlon's Sustainability & CSR storyline via Athlon Project Zero, a 12,000 km full electric road trip through Europe, was recognized with an award for best team initiative. The insights of this full electric road trip were shared with customers via a whitepaper about electrification in Europe and multiple keynote presentations in the markets. One-on-one sessions with customers were also part of the plan. The main goal: start and speed up a

Sustainability & CSR movement, together with our customers.

A multi-channel (Athlon website, social media, third party websites, etc.) communication and marketing campaign proved and showed our target audiences what we as a company stand for and believe in. Walking the talk has certainly earned us additional credibility. It enhanced our position as eMobility expert in our industry and got our own colleagues enthusiastic about the topic. And the cherry on the cake: other industry players are now organizing similar initiatives. This proves that our actions really are shaping sustainable mobility and that we are speeding up the movement.

EcoVadis Athlon International: on the right track!

The international rating agency EcoVadis operates an evidence-based online platform that provides supplier sustainability ratings and allows companies to assess the ESG performance of their global suppliers. To achieve a good EcoVadis rating, Athlon measures and constantly improves its sustainability performance, and reports on its progress in this regard.

In March 2023, EcoVadis confirmed that Athlon Group is on the right path to becoming a sustainable organization. The agency expressed appreciation for the policies and strategies that Athlon has implemented, and pointed out the areas where we still need to improve. These recommendations will help us take the next steps toward achieving Gold medal status in 2025.

GRI Standards Reference table

General disclosures 2016			
GRI	GRI Description	Disclosure	Page
Organizational profile			
102-1	Name of the organization	Athlon Car Lease International B.V.	
102-2	Activities, brands, products and services	Our company > Athlon at a glance Our company > Our products and services	6-7 10
102-3	Location of headquarters	Athlon Car Lease International B.V. – Stationsplein Noord-Oost 414, 1117 CL Schiphol Visiting address: Veluwezoom 4, Postbus 60250, 1320 AH Almere	
102-4	Location of operations	Our company > Athlon at a glance	6-7
102-5	Ownership and legal form	Athlon Car Lease International B.V. Our company > Athlon at a glance	6-7
102-6	Markets served	Our company > Athlon at a glance	6-7
102-7	Scale of the organization	Our company > Athlon at a glance	6-7
102-8	Information on employees and other workers	Our company > Athlon at a glance	6-7
102-9	Supply chain	Our company > Our supply chain	12
102-10	Significant changes to the organization and its supply chain	Not applicable	
102-11	Precautionary Principle of approach	Annexe 2: Athlon International Code of Conduct	78
102-12	External initiatives	Our company > Our mission, vision and values	8-9
102-13	Membership of associations	Governance > Knowledge-sharing networks	69
Strategy			
102-14	Statement from senior decision-maker	Sustainability & CSR Director interview Our sustainable strategy > "It all starts with your empowering beliefs"	20-21
Ethics and integrity			
102-16	Values, principles, standards and norms of behavior	Our company > Our mission, vision and values Governance > Corporate governance	8-9 66
Governance			
102-18	Governance structure	Governance > Our sustainability and CSR governance	68

GRI	GRI Description	Disclosure	Page
Stakeholder engagement			
102-40	List of stakeholder groups	The format of this first report is based on the Materiality Matrix in the Dutch report (Corporate Social Responsibility, Athlon Nederland 2020). We plan a new stakeholder consultation at group level in the near future.	
102-41	Collective bargaining agreements	Information on the collective bargaining agreements is not centrally available.	
102-42	Identifying and selecting stakeholders	The format of this first report is based on the Materiality Matrix in the Dutch report (Corporate Social Responsibility, Athlon Nederland 2020).	
102-43	Approach to stakeholder engagement	We plan a new stakeholder consultation at group level in the near future.	
102-44	Key topics and concerns raised		
Reporting practice			
102-45	Entities included in the consolidated financial statements	Our company > Athlon at a glance Governance > Our sustainability and CSR governance	6-7 68
102-46	Defining report content and topic boundaries	Our Sustainability & CSR Strategy > Co-creating the future of mobility: our 5 impact areas Our Sustainability & CSR Strategy > Our contribution to the SDGs	24-27 28
102-47	List of material topics	Our Sustainability & CSR Strategy > Co-creating the future of mobility: our 5 impact areas The format of this first report is based on the Materiality Matrix in the Dutch report (Corporate Social Responsibility, Athlon Nederland 2020).	24-27
102-48	Restatements of information	Not available	
102-49	Changes in reporting	No changes in the list of material topics	
102-50	Reporting period	2022	
102-51	Date of most recent report	5 June 2023	
102-52	Reporting cycle	Every year	
102-53	Contact point for questions regarding the report	Alexander Heijkamp, Sustainability and Corporate Social Responsibility (CSR) Director, alexander.heijkamp@athlon.com	
102-54	Claims of reporting in accordance with the GRI Standards	This report has been inspired by the GRI Standards	
102-55	GRI content index	Current table	72-75
102-56	External assurance	Not applicable (report inspired by GRI)	

Material topics, boundaries, management approach and indicators			
Disclosure	GRI Description	Disclosure	Page
Environmental			
Emissions 2016			
103-1 - 103-3	Management approach	Our impact areas > Climate Action > Our contribution	38
305-1	Direct (Scope 1) GHG emissions	Our impact areas > Climate Action	38-45
Own indicator	Net carbon-neutral offices and locations	Our impact areas > Climate Action	38-45
Own indicator	Entirely or partly electric (xEV) vehicles in customer fleet	Our impact areas > Climate Action	38-45
Own indicator	Entirely or partly electric (xEV) vehicles in employee fleet	Our impact areas > Climate Action	38-45
Own indicator	CO ₂ tailpipe emissions in customer fleet	Our impact areas > Climate Action	38-45
Own indicator	CO ₂ tailpipe emissions in employee fleet	Our impact areas > Climate Action	38-45
Social			
Occupational Health and Safety 2018			
403-1	Occupational health and safety management system	Our impact areas > Vital People > Our contribution Athlon international operates on the basis of globally uniform guidelines for risk prevention. Our occupational health and safety policy, guidelines and services serve as overarching, international Group regulations for each individual market.	38
403-2	Hazard identification, risk assessment, and incident investigation		
403-3	Occupational health services		
403-4	Worker participation, consultation, and communication on occupational health and safety		
403-5	Worker training of worker health		
403-6	Promotion of worker health		
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		
Own indicator	Pulse Check survey	Our impact areas > Vital People	54-59
Own indicator	Staff saying Athlon is contributing to their vitality	Our impact areas > Vital People	54-59
Own indicator	Athlon markets with a mental and physical health programme	Our impact areas > Vital People	54-59

Disclosure	GRI Description	Disclosure	Page
Social			
Diversity and equal opportunity 2016			
103-1 - 103-3	Management approach	Our impact areas > Diversity, Equity and Inclusion > Our contribution	61
Own indicator	Diversity, Equity and Inclusion (DEI) Networks	Our impact areas > Diversity, Equity and Inclusion	60-63
Own indicator	Ration females/total employees	Our impact areas > Diversity, Equity and Inclusion	60-63
Own indicator	Ration female leaders/total employees	Our impact areas > Diversity, Equity and Inclusion	60-63
Own indicator	Young leaders (< 40 y)	Our impact areas > Diversity, Equity and Inclusion	60-63
Own indicator	Average age Athlon employees	Our impact areas > Diversity, Equity and Inclusion	60-63
Own indicator	Number of internships	Our impact areas > Diversity, Equity and Inclusion	60-63
Local communities 2016			
103-1 - 103-3	Management approach	Our impact areas > Community Engagement > Our contribution	51
Own indicator	Voluntary work by Athlon employees	Our impact areas > Community Engagement	50-53
Own indicator	Staff participation in voluntary programme	Our impact areas > Community Engagement	50-53
Customer and consumer health and safety 2016			
103-1 - 103-3	Management approach	Our impact areas > Road Safety > Our contribution	47
Own indicator	Athlon markets providing road safety solutions	Our impact areas > Road Safety	47-49
Own indicator	Accidents caused by an Athlon vehicle	Our impact areas > Road Safety	47-49

Annexes

Annexe 1: Declaration on the Principles of Sustainability and Corporate Social Responsibility (updated version January 2023)

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

Our Sustainability and Corporate Social Responsibility (CSR) Mission Statement

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

Sustainability

As Athlon Car Lease International B.V. we are aware of the impact we have on the climate, road safety and sustainability topics in society as a whole. A big fleet automatically results in a higher CO₂ emission and a bigger risk to (road) safety. Hence, we focus on providing and giving advice on sustainable mobility. For example by:

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

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

Corporate Social Responsibility

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

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

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

Our Commitment

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

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

- **Climate Action:** Lowering our own carbon footprint every year and help our customers lower their carbon footprint by helping them to change mobility towards full electric mobility.

- **Road Safety:** By sharing our knowledge and practical solutions we aim to lower the number of road accidents within Europe.
- **Community Engagement:** We aim to create positive social impact, because our social responsibility goes further than cars and mobility.
- **Vitality:** Happy employees create happy customers and vice versa. That is why we want to increase the vitality of our employees. This includes the vitality of both body and mind.
- **Diversity, Equity and Inclusion:** We appreciate and foster diversity among our employees and we capitalize on the different experiences, skills and perspectives they bring in.

Quality & Customer Focus

We realize this through:

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

Meeting Demands

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

Together

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

Our Contribution to the Sustainable Development Goals of the UN | Paris Climate Agreement

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

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

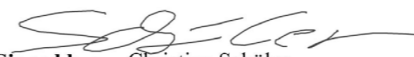


Through our areas of impact 3 (Community Engagement), 4 (Vital people) and 5 (Diversity and Inclusion), we also have an indirect impact on:


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



Athlon Car Lease International B.V.
Schiphol, January 2023


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Christian Schüler
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Athlon Car Lease International B.V.
Schiphol, January 2023


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Sustainability and CSR Director

Annexe 2: Athlon International Code of Conduct (updated version January 2023)

Company Profile

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

Why and for Whom?

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

Compliance with Law

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

Anti-Bribery and Corruption

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

Gifts and Hospitality

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

Conflicts of Interest


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

Fair Competition and Antitrust

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


The Athlon International Code of Conduct is based on the Mercedes-Benz Integrity Code and Mercedes-Benz Responsible Sourcing Standards, which are applicable for Athlon Group.

Athlon Car Lease International B.V.
Schiphol, January 2023


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**Want to know more about
Sustainability and CSR at Athlon?**

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