



CODE OF ETHICS AND COMMITMENTS

December 2022, version 3



Message of the President of the Management Board and Group Executive Committee

At Europcar Mobility Group our aim is to be a leader in dedicated, sustainable mobility services.

As part of that aim, it is critical that both as individuals, and as part of the team, we operate with the highest standards of integrity, trust and ethics towards our customers, each other, our communities and our investors.

In order to guide us on a daily basis, this Code sets out the main principles of the ethics policy applicable to Europcar as an international company that carries on business all over the world and which is headquartered in the European Union.

The Code sets out both the standards we apply and the importance we place on integrity and compliance.

It is the personal responsibility of each of us, as well as the collective responsibility of the Group and its management bodies, to live up to these standards on a daily basis, and to uphold the key principles of integrity, honesty and the protection of our people and assets. It is therefore critical that we apply the standards every day in all our activities, adopting and adhering to a zero-tolerance policy towards unethical behavior and non-compliance.

To support us, the Group has developed, routinely enforces, and regularly updates a dedicated compliance program, which aims at detecting and preventing corruption, fraud, conflicts of interests, anti-competitive practices, risk of harm to personal data or to the environment.

We firmly believe that the only way to do business is an ethical way and, as such, we reject any form of unethical or illegal business behavior and practices.

We count on all of us to live by these principles and apply them every day, and we count on our business partners to make themselves aware of and abide by the same principles, in order to move forward together aligned on the principles of honest and sustainable business conduct.

With your help, I know this is a commitment we make to our customers, our team, the communities we serve and to our investors.

Peter Gowers
President of the Management Board and Group Executive Committee

FOREWORD

The purpose of this Code is to raise our stakeholders' awareness of the key ethical principles to which EUROPCAR MOBILITY GROUP operates, without amounting to a comprehensive or exclusive list. These principles apply fully to all our activities.

This Code has also been prepared by reference to a series of international codes, conventions and guidelines to which EUROPCAR MOBILITYGROUP adheres:

- ✓ the United Nations' *Universal Declaration of Human Rights*

- ✓ the *European Convention on Human Rights*

- ✓ various conventions of the International Labor Organization, particularly Conventions 29, 105, 138 and 182 (child labor and forced labor), 155 (occupational safety and health), 111 (discrimination), 100 (equal remuneration), 87 and 98 (freedom of association, right to organize and collective bargaining)

- ✓ the *OECD Guidelines for Multinational Enterprises*

- ✓ the UN *Convention on the Rights of the Child*

- ✓ the *UN Global pact*



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1. EUROPCAR MOBILITY GROUP business ethics

EUROPCAR MOBILITY GROUP has developed a set of principles governing our behaviour. These are summarized in this Code of Ethics and Commitments (the “Code”).

All employees of the Group are responsible for the effective application of these principles.

These principals are:

- ✓ Comply with national and international laws and regulations,
- ✓ Respect the dignity and the human & property rights of our employees, customers, industrial and commercial partners, and shareholders,
- ✓ Preserve the environment in all our activities,
- ✓ Avoid situations of personal conflict of interest that could be contrary to the interests of our Group,
- ✓ Protect data relating to our Group, its customers and manage this confidentiality according to the company’s internal procedures,
- ✓ Protect the company’s assets and resources,
- ✓ Encourage all internal and external initiatives that improve our social and environmental performance and help our company grow sustainably.
- ✓ Always ensure that our partners commit to complying with our Code and the Guide.

2. Our Objectives and commitments to our stakeholders

2.1 Towards our customers and consumers

Europcar Mobility Group aims at developing services that meet or exceed our customers' and consumers' expectations to earn and maintain their trust.

EUROPCAR MOBILITY GROUP'S COMMITMENTS:

- ✓ communicate clearly and transparently on the conditions of access to our services (legal terms & conditions and rates)

Europcar Mobility Group's objective is to guarantee data security and privacy

EUROPCAR MOBILITY GROUP'S COMMITMENTS:

- ✓ take every action needed for compliance with regulatory requirements and especially Regulation (EU) 2016/679 of the European Parliament and of the council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation – GDPR) and the requirements and recommendations of the French data privacy authority (Commission Nationale Informatique et Libertés),
- ✓ implement the technical means required to protect data against unauthorized access, and in particular to guarantee the confidentiality of our customers' data,
- ✓ be transparent about how the company uses parties' data, fully respecting their rights to information, correction and modification,
- ✓ raise all employees' awareness – regarding the requirement to access personal information only where it is necessary to do so for the strict fulfilment of their roles.

2.2 Towards our employees

Europcar Mobility Group's intention is to look after the health and safety of its employees

EUROPCAR MOBILITY GROUP'S COMMITMENTS:

- ✓ ban and actively fight all forms of intimidation and harassment,
- ✓ ensure compliance with all applicable regulations,
- ✓ promote employee and manager training on working methods, regarding compliance with rules, instructions, safety procedures and the use of security equipment.



Europcar Mobility Group's objective is to promote equal opportunity within the company

EUROPCAR MOBILITY GROUP'S COMMITMENTS:

- ✓ ban and actively fight all forms of discrimination,
- ✓ ensure employees' career advancement is based on criteria of professional skill and ability only – without distinction of origin, sex, sexual orientation, age, family situation/pregnancy, genetic characteristics, supposed or actual membership of an ethnic group, nation or race, political opinion, trade union, religious convictions, physical appearance, name, state of health or disability of any kind.

Europcar Mobility Group's objective is to enable its employees to maximize their potential at work

EUROPCAR MOBILITY GROUP'S COMMITMENTS:

- ✓ encourage the development of professional skills through adapted training programs that balance the company's needs with employees' career expectations,
- ✓ ensure fair recognition of skills and performance through professional assessments, at least once a year, aiming to define the individual prospects open to each employee,
- ✓ inform employees of the possibilities and opportunities for advancement within EUROPCAR MOBILITY GROUP through dedicated communication tools,
- ✓ opt for, whenever possible, internal promotions,
- ✓ encourage managers to build a positive working environment, particularly through mutual respect, recognition of the right to make mistakes, the promotion of team spirit and regular information sharing with their team members.

Europcar Mobility Group encourages positive labor relations and employees' freedom of expression.

EUROPCAR MOBILITY GROUP'S COMMITMENTS:

- ✓ respect union rights and foster the management-employee dialogue through the various representative bodies,
- ✓ ban all forms of discrimination,
- ✓ ensure regular sharing of information with all employees, through dedicated methods of communication, on company news and events that could affect EUROPCAR MOBILITY GROUP directly or indirectly, individually or collectively,
- ✓ promote the free expression of every employee's ideas, regarding both his/her management team and colleagues, in the spirit of mutual respect,



- ✓ provide each employee with a means of appeal, particularly through EUROPCAR MOBILITY GROUP's written standards of disciplinary action, guaranteeing compliance with the rules of fairness regarding any management decision affecting him/her.

Europcar Mobility Group aims to prevent insider trading and the unwarranted use of confidential or privileged information

EUROPCAR MOBILITY GROUP'S COMMITMENTS:

- ✓ make all employees aware of, and train top managers regarding, the strict ban on the use of privileged and confidential information to conduct or enable (directly or through intermediaries) an operation prohibited by law on a regulated market or to act in this way for personal profit, for the benefit of others or, more generally, for any speculative motive.

2.3 Towards our industrial and commercial partners

Europcar Mobility Group objective is to choose industrial and commercial partners that operate in their respective countries, in compliance with fundamental labor rights, as defined in particular, by the international labor organization.

EUROPCAR MOBILITY GROUP'S COMMITMENTS:

- ✓ Work with industrial and commercial partners that commit to comply with:
 - the ban on child labor and forced labor,
 - the ban on practices detrimental to human dignity, including discrimination and harassment based on sex, age, actual or supposed membership of a race, ethnic group or nation, disability, sexual orientation, opinions or religious, political or trade union activities,
 - implementation of legal mechanisms that guarantee employee representation and the defense of labor rights within the company,
 - compliance with regulations applicable, in particular, to working conditions and working hours,
 - implementation of mechanisms designed to promote open labor relations, where they exist,
 - compliance with applicable regulations regarding health, safety and the environment.



Europcar Mobility Group objective is to ensure mutual respect for the principles of loyalty in all our industrial and commercial relations

EUROPCAR MOBILITY GROUP'S COMMITMENTS:

- ✓ Comply and make our employees comply with the laws relating to fair and appropriate competition,
- ✓ Ensure that no action taken amounts to an anti-competitive practice,
- ✓ Enforce compliance with the rules of industrial, intellectual and artistic property, by prohibiting the unauthorized distribution of works, documents, software and, more generally, all materials protected by such rights.

Europcar Mobility Group objective is to prevent all forms of active or passive corruption.

The Group affirms and routinely enforces a **“zero-tolerance policy”** towards all forms of corruption and bribery.

To enable the application of this policy into everyday activities, the Group has developed an Anti-corruption guide which can be found as an Appendix to this Code.

Where uncertainty exists regarding how to interpret certain situations or requests, employees should seek the guidance of their line management, local compliance officers or Group Compliance Officer.

EUROPCAR MOBILITY GROUP'S COMMITMENTS:

- ✓ Comply and enforce our employees' compliance with:
 - regulations prohibiting active and passive corruption,
 - regulations governing the financing of political activities.
- ✓ Apply a strict framework of acceptance and giving of any gift and invitation, or other benefit of any kind.
- ✓ Ensure that our partners commit to complying with these regulations and rights in their dealings with EUROPCAR MOBILITY GROUP.



2.4 Towards financial market

EUROPCAR MOBILITY GROUP aims to promote its success and to act with respect for its shareholders to earn their trust. Therefore, EUROPCAR MOBILITY GROUP attaches major importance to information quality, and ensures transparent reliable communication with regard to all its stakeholders.

EUROPCAR MOBILITY GROUP's commitments:

- ✓ Ensure equality of treatment for our shareholders and bounds holders on the listed market, when applicable,
- ✓ Ensure that employees keep confidential any non-public information, until it is published by the proper parties. In particular, information concerning results, forecasts and other financial data, information concerning purchase and selling plans, commercial offers, new services or know-how, all decisions by oversight authorities, loss or securing of a major contract, or information concerning ongoing legal proceedings or litigation and human resources must be considered strictly confidential,
- ✓ Ensure that transactions made by its employees adhere to the laws and regulations governing financial activities,
- ✓ Ban utilization of confidential information for personal profit (whether directly or indirectly), or in order to enable a third party to carry out a financial operation.

2.5 Towards environment

Europcar Mobility Group's objective is to minimize its business' environmental footprint, while ensuring compliance with environmental regulations, reducing the impact of its services and infrastructure on the environment, and by cutting its consumption of power and raw materials.

EUROPCAR MOBILITY GROUP'S key objectives:

- ✓ reduce its water use;
- ✓ reduce its energy use by developing the acquisition of hybrid and electrical, vehicles and through the promotion of sustainable mobility;
- ✓ reduce its CO² emission by providing customers with a greener fleet;
- ✓ limit and reduce the environmental impact of its activities;
- ✓ deals with waste management effectively;
- ✓ raise awareness and promote greater environmental responsibility;
- ✓ ensure compliance with Europcar Mobility Group Sustainable Development Charter, ISO 14001 certification and, participation in the UN Global Compact.

3. Promotion and application of the Code

- ✓ This Code is communicated to all EUROPCAR MOBILITY GROUP employees and, when required, to third parties with whom EUROPCAR MOBILITY GROUP engages. It is available to all employees on the company intranet, as well as from the Department of Communication.
- ✓ EUROPCAR MOBILITY GROUP's employees are all specifically trained regarding the Code's application and they promote the Code's principles and commitments while ensuring that it is applied at all time.
- ✓ EUROPCAR MOBILITY GROUP's Executive Committee will conduct an annual review of the Code's proper application and distribution.
- ✓ Assistance and advice can be obtained from the Group's Compliance Committee. Its purpose is to help any employee who wishes to correctly apply the Code's principles and commitments, entirely confidentially and with the assurance that answers will be provided within a reasonable time frame.
- ✓ This Committee will deliver in due course a report to EUROPCAR MOBILITY GROUP's Management Board, with suggestions of initiatives and actions that it deems useful or necessary to guarantee the enduring nature of the pledges contained in EUROPCAR MOBILITY GROUP's Code of Ethics and Commitments.
- ✓ This Committee does not, in any way, replace existing structures and processes involved in the implementation of this Code (e.g. the management system, the Human Resources Department, employee representatives, the labor mediator and any other department involved (Legal, Internal Audit, Environment, etc.)). Nor is the Committee an appeals board that review management decisions or actions contrary to the principles of the Code.

4. Contact

If you witness something that does not look or sound right, you should always speak up.

You can do so through:

- ✓ Informing your local manager or supervisor;
- ✓ Informing your local compliance officer;
- ✓ Informing our Group Compliance Officer;
- ✓ Making a direct report using a dedicated platform, Whispli: <https://app.whispli.com/Ethics-Europcar>.

Never hesitate to take an action and raise your concerns, on matters such as:

- ✓ Business integrity (including prevention of corruption),
- ✓ International sanctions and trade compliance,
- ✓ HR (such as, discrimination or harassment),
- ✓ Humans rights,
- ✓ Environment and safety,
- ✓ Misuse of Group's assets,
- ✓ Fraud,
- ✓ Anti-competitive practices (such as cartels and bid rigging).

A person, raising a concern in a good faith, will never be subject to any retaliation or disciplinary measures. The identities of any employees involved will be kept confidential and the alerts will be treated in a timely manner and in confidence.