

EMG Fair Dealing Policy

Introduction

1. Europcar Mobility Group (“EMG”) is committed to conduct its business in a fair and ethical manner, in compliance with all applicable laws and regulations.

Confidentiality

2. EMG acknowledges that EMG and business partners share commercially sensitive information necessary for their legitimate business dealings. By way of example, this may include non-public information on net rates, recommended retail prices, sales, marketing, commission and other sensitive information necessary for their business relationship.
3. EMG endeavours to protect confidentiality at all times. EMG treats commercially sensitive information shared between business partners as highly confidential. EMG expects its business partners to treat commercially sensitive information received from EMG as confidential, unless otherwise indicated, and to refrain from sharing or using this information in any way that would compromise this principle.
4. EMG will not request that its business partners share third-party commercially sensitive non-public information with EMG and expects its business partners to respect the confidentialities of EMG and third parties.

Fair and ethical dealings

5. EMG will endeavour to deal fairly and ethically with all business partners and expects its business partners to do the same. This includes compliance with all applicable consumer, competition, anti-bribery, fair dealing, and health and safety laws.

Competing Openly and Fairly

6. EMG is committed to competing openly and fairly. EMG will not:
 - a. Discuss or share competitively sensitive information with competitors including pricing, customers, marketing plans or strategies.

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- b. Discuss or agree to the division or sharing of customers, territories or markets with competitors.
- c. Discuss or agree with competitors how or whether to bid for business or online/offline marketing activities.

Dealing with Partners

- 7. EMG does not seek to directly or indirectly influence or interfere with the independent commercial decisions or conduct of its business partners in any way, outside the framework of the applicable contractual agreements. This includes decisions on pricing, strategy, promotions, and strategic plans.

Independent Marketing Strategy

- 8. EMG chooses its marketing strategy independently. It will not agree or discuss its marketing strategy, including the online and offline advertising channels and services, with competitors.
- 9. EMG will never seek to influence, restrict, or interfere with business partners' marketing choices, outside the framework of the applicable laws and contractual agreements.

Whistleblower System

- 10. In the event of concerns regarding compliance with the EMG Fair Dealing Policy, EMG stakeholders can use EMG's Whistleblower System which can be accessed at <https://europcar.whispli.com/lp/ethics?locale=en>. EMG supports whistleblowers and maintains a whistleblowing platform that protects their identity and strictly complies with personal data requirements.