



Driving Results

2025
Sustainability
Impact Report

getting you there



Preface

Dear Reader,

This Sustainability Impact Report reflects what can be achieved when people come together with a common purpose: To shape sustainable mobility, and to drive results.

I would like to thank all colleagues across Athlon who contribute to this progress. I am grateful to those who plan, execute and continuously analyse our sustainability targets, ensuring focus, discipline and transparency. I would also like to thank the many colleagues who volunteer their time and energy, helping to bring our sustainability strategy to life and creating impact beyond our business.

Our progress would not be possible without our customers! Thank you for working with us, for challenging us, and for co-creating solutions that support more sustainable mobility. Driving results means moving forward together.

I am equally thankful to our suppliers and partners for their collaboration and commitment. By working closely across the value chain, we strengthen not only our individual contributions, but also our shared responsibility to reduce emissions, uphold high standards and create long-term value.

This report is therefore more than an overview of targets and milestones. It reflects trust, teamwork and sustained effort. We will continue our joint journey based on these ingredients.

Sincerely,

Christian Schüler

CEO Athlon

Content



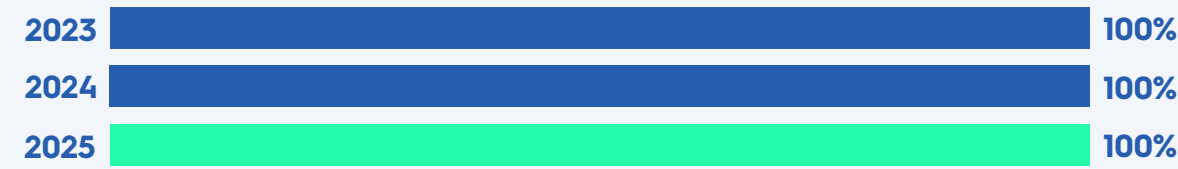
01 Sustainability Impact Scorecard	4	06 Our Policies	33
02 Our Road to Sustainable Mobility		07 Certified for Sustainability	
Who we are	5	The Importance of Certification	35
What we do	5	EcoVadis	35
How we do it	5	08 Co-shaping Mobility	36
Vision, Mission and Values	6	09 Appendices	
03 A Word from our ESG Director	7	GRI Standards	39
04 Driving Sustainable Success through ESG		Connection between Athlon's	
ESG at the Core	8	Key ESG Drivers and ESRS	47
Explaining our ESG Strategy	8	Connection between ESG	
ESG and our Local Markets	9	Key Drivers and SDG's	50
ESG and our Shareholder	9	Declaration of Sustainability	53
Overall Double Materiality Matrix	10	Code of Conduct	54
05 Our Key ESG Drivers			
Protect our Planet E	12		
Climate Action and Air Pollution	13		
Circular Economy	18		
Reduce Water Use	19		
Empower our Community S	20		
Responsible Inclusive Employer	20		
Road Safety	27		
Community Engagement	29		
Steer our Impact G	31		
Building on Business Ethics	31		
Customer and Supplier Engagement	32		
ESG Governance	32		

Sustainability Impact Scorecard

E Environment: Protect our Planet



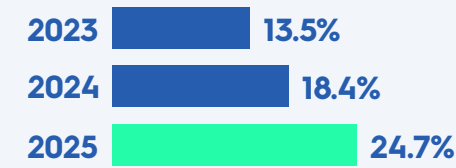
% offices and locations that are net carbon-neutral*
(in collaboration with the Mercedes-Benz Mobility Green Office project)



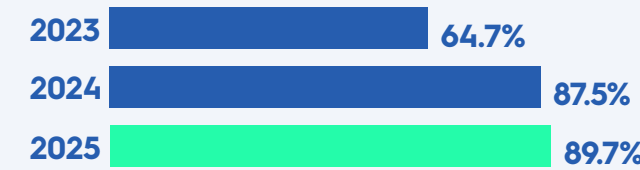
xEV Customer Fleet



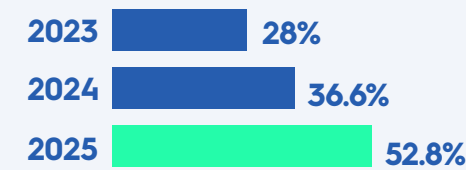
BEV Customer Fleet



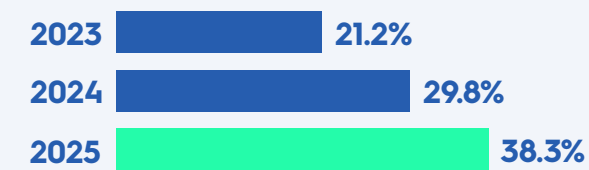
xEV Employee Fleet



BEV Employee Fleet



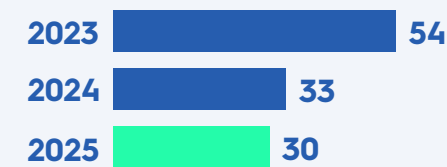
% Order intake share BEV



Average CO₂ tailpipe emissions per vehicle (customer fleet)



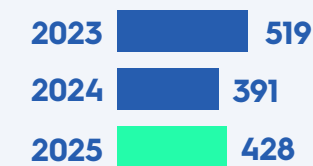
Average CO₂ tailpipe emissions per vehicle (employee fleet)



Scope 1 emissions (metric ton CO₂e_q)



Scope 2 emissions (metric ton CO₂e_q)



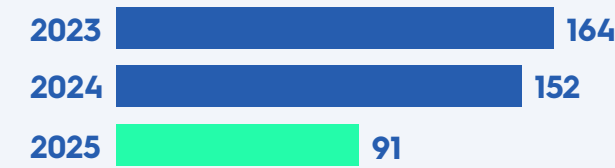
S Social: Empower our Community



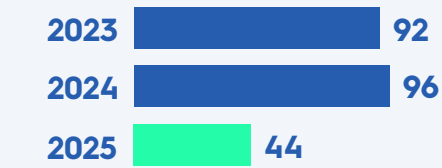
Accidents caused by an Athlon vehicle (number of damages / total insured fleet)**



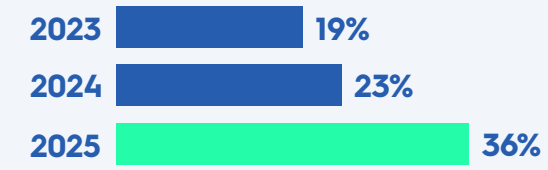
Number of internships



of which active interns at 31-12



% Women in top positions



% of female leaders as part of all leaders



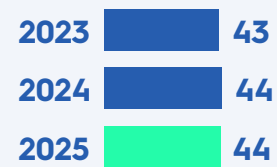
% of women as part of the total employee base



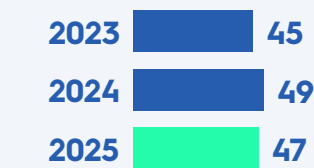
% of leaders aged < 40



Average age of Athlon employees



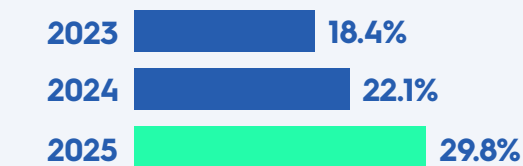
Number of nationalities within Athlon



Volunteering hours



Active contributors %



We sharpened definitions, bringing ratios of previous years in line to enable comparison.

G Governance: Steer our Impact

Engagement Survey



Mandatory e-Learning (hours)



Integrity at Work



Sustainability Mercedes-Benz



Human Rights



Data, AI & Cyber Security



* Net carbon-neutral means that carbon emissions that have neither been avoided nor reduced at the Athlon Group are compensated for by certified offsetting projects.

** Vehicles insured within Athlon Netherlands, Belgium, France, Germany and Italy.

Our Road to Sustainable Mobility



Who we are

We are Athlon.

We are in the mobility business, providing leasing and fleet management to organisations across Europe.

We are part of Mercedes-Benz AG.

What we do

With over a century of expertise, we create and supply fleet and mobility solutions to a wide range of customers, innovating and adapting to meet their changing needs.

In 2025, Athlon was active in 20 European countries, with our own offices as well as local partners. Our diverse team of around 1,860 colleagues (and 47 nationalities) work closely with customers, partners and colleagues to provide a multi-brand fleet of about 400,000 cars and vans (500,000, including partner fleets).

How we do it

Quite simply, we put people first. Customers, colleagues and our community. Together, we are working towards one overarching goal: to shape sustainable mobility.

We are doing this by electrifying our fleets as much and as quickly as we can.

At the end of 2025, we are proud to announce our results:

→ **Our customer fleet:** 40% xEV share, 25% BEV share

→ **Our employee fleet:** 90% xEV share, 53% BEV share

We also have high standards for xEV. At Athlon, we define this as BEV and PHEV vehicles with ≤ 50 gr/km of CO₂ emission (WLTP).

Vision, Mission and Values

Key ESG Drivers

- Protect our Planet
- Empower our Community
- Steer our Impact

Mission

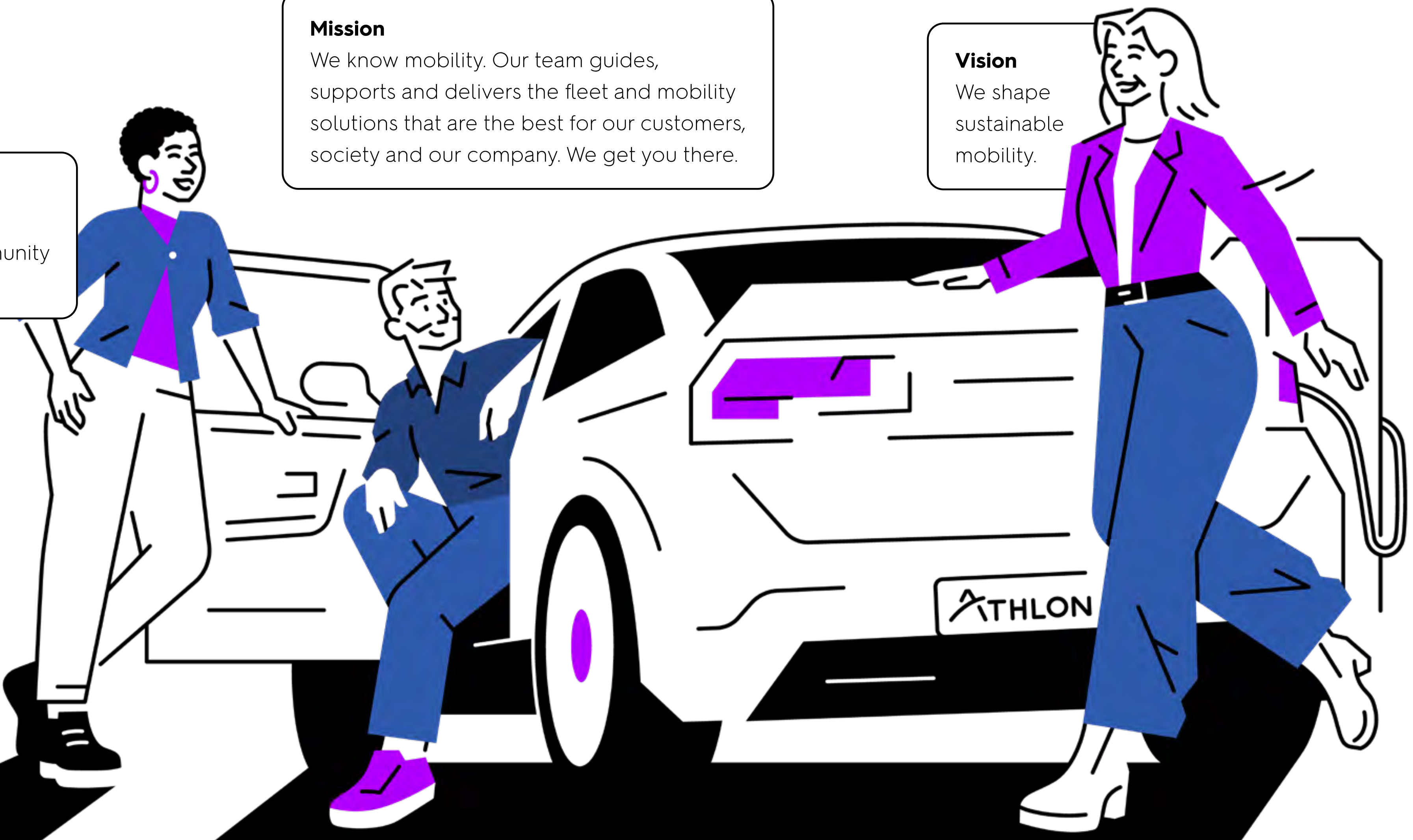
We know mobility. Our team guides, supports and delivers the fleet and mobility solutions that are the best for our customers, society and our company. We get you there.

Vision

We shape sustainable mobility.

Values

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



A Word from our ESG Director

2025: ESG is maturing

2025 was a great year for ESG at Athlon. We continued to develop our key principles, such as ethics, long-term sustainability and social responsibility, while also making a few changes along the way. This resulted in the Athlon Group being awarded the EcoVadis Silver medal in December 2025, something we are really proud of. In the Netherlands, we even received a Platinum medal at the end of the year. It is a testament to our hard work and commitment to always improve, so I would like to say thank you to everyone who contributed to getting us there.

This past year, ESG has further matured across our organisation. We have broadened our scope to include our entire value chain, with measures including:

- Collaborating with suppliers and procurement teams upstream
- Strengthening customer support and collaboration downstream
- Celebrating visible progress through certifications, awards and recognition

These actions enable us to set the stage for even greater impact in the years ahead – impact we want to create and need to achieve together.

From connecting to empowering our community

We also updated one of our key drivers to better reflect our ambitions. While ‘Connect’ is about building relationships and creating networks, ‘Empower’ reflects how we want to give people the tools, resources and autonomy to take action and – most importantly – to create impact that matters. I’m proud to say that we are making steady progress toward that goal.

New ambitions for 2030

With 2025 marking the end of our previous target year, we have now set new ambitions, with 2030 as our target year.

They give us a roadmap to:

- Enhance our environmental performance
- Extend our social impact
- Maintain the highest standards of corporate governance



“Let’s keep up the good work, continue to create impact, and drive our sustainability results together!”

Klaas Pool – ESG Director

We will use these new ambitions as a framework to guide every action we take, driving us forward in a responsible and sustainable way.

Driving Sustainable Success

ESG at the Core

Our ESG strategy is our blueprint for action. It guides everything we do, making sure that we remain ethical, create long-term sustainability and maintain the trust of the communities we serve.

We have tailored our ESG strategy to the way we do business, centering on what is most important:

- Protecting the planet
- Empowering our communities
- Steering our impact

Explaining our Strategy

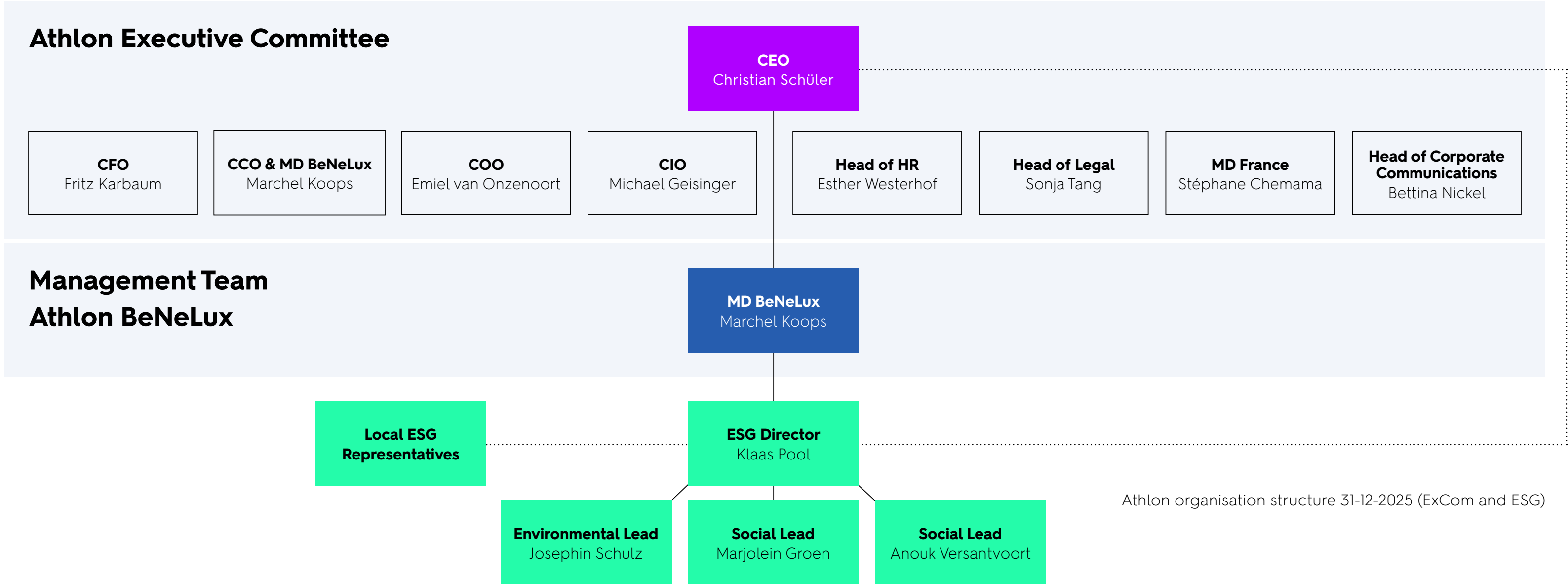
Our ESG strategy reflects our company’s core values, guiding us towards achieving our objectives. We have created the strategy, using our double materiality assessment, a methodology aligned with the European Sustainability Reporting Standards (ESRS) (see appendix 2).

The materiality assessment helped us to define our sustainability ambitions in two ways:

- **Impact materiality**
Our impact on the environment and society.
- **Financial materiality**
How sustainability issues affect our financial performance.

Having a greater understanding of these two factors allows us to make better informed decisions, identify risks and welcome opportunities to create long term value and meaningful change and impact.

We plan to update our materiality assessment at the end of 2026 to realign with our stakeholders.



Athlon organisation structure 31-12-2025 (ExCom and ESG)

ESG and our Local Markets

At a local level, we use ESG Change Makers to translate our group-wide sustainability goals into actionable plans. These colleagues work closely with communities to make sure we create positive change and comply with regulations.

ESG and our Shareholder

In 2025, Athlon's ESG Director was a member of the Mercedes-Benz Mobility* ESG Steering Committee, enabling us to collaborate extensively. Together, we aligned ESG strategies, goals, shared knowledge, and co-developed initiatives to amplify our impact. For more details, see Chapter 8.



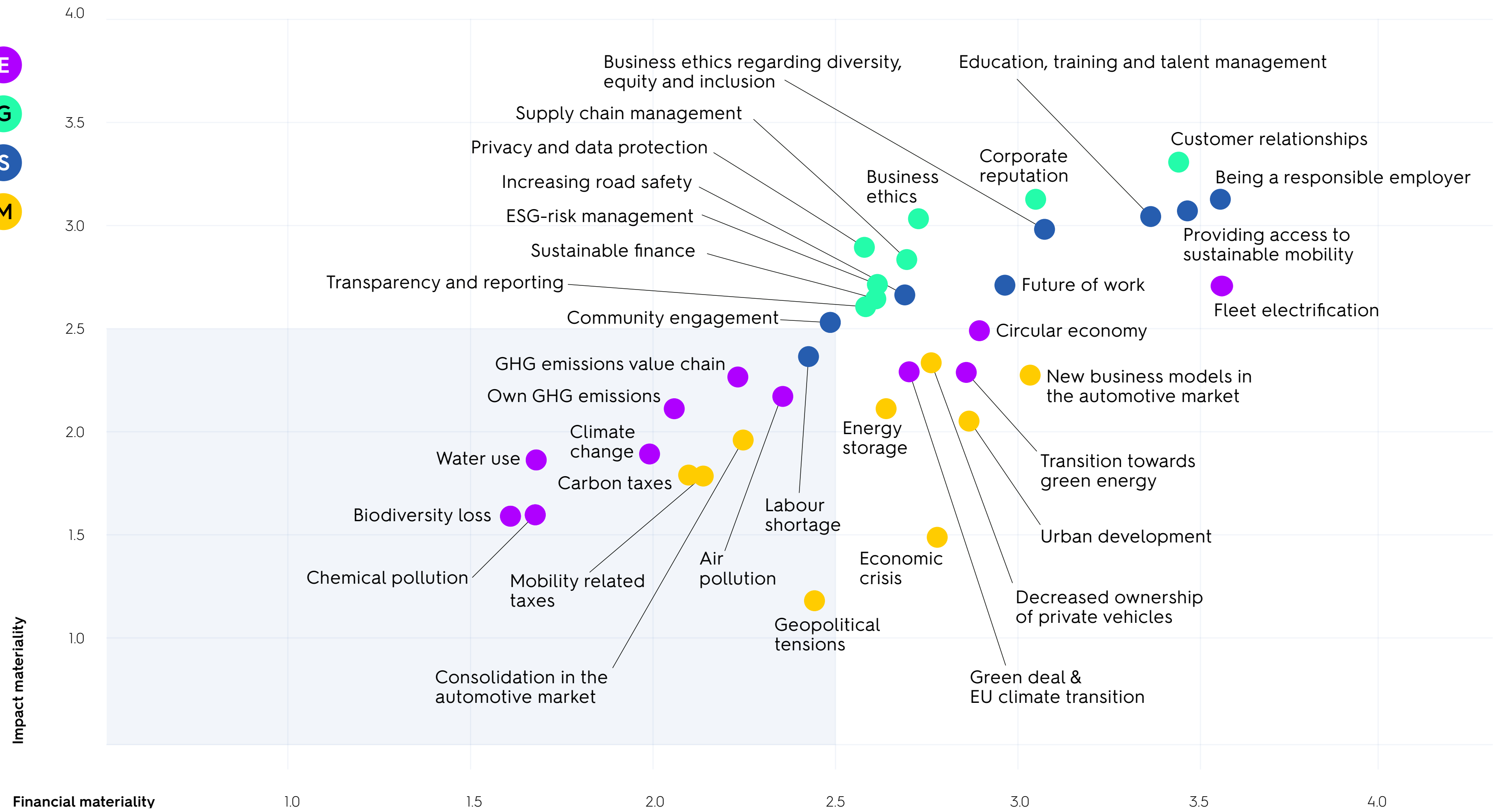
A note about SDGs

The Sustainable Development Goals (SDGs) are 17 global targets set by the UN to tackle poverty, inequality and climate change, with the goal of reaching peace and prosperity by 2030.

While all SDGs matter, we focus on those where our company can make the biggest difference: our Focus SDGs. Through our double materiality assessment and stakeholder input, we have identified key topics and linked them to relevant SDGs to make sure that our sustainability efforts contribute to global priorities while delivering real local impact. Our focus SDGs can be found in Appendix 3.

* Mercedes-Benz Mobility AG was integrated into Mercedes-Benz AG on 1 January 2026.

Overall Double Materiality Matrix

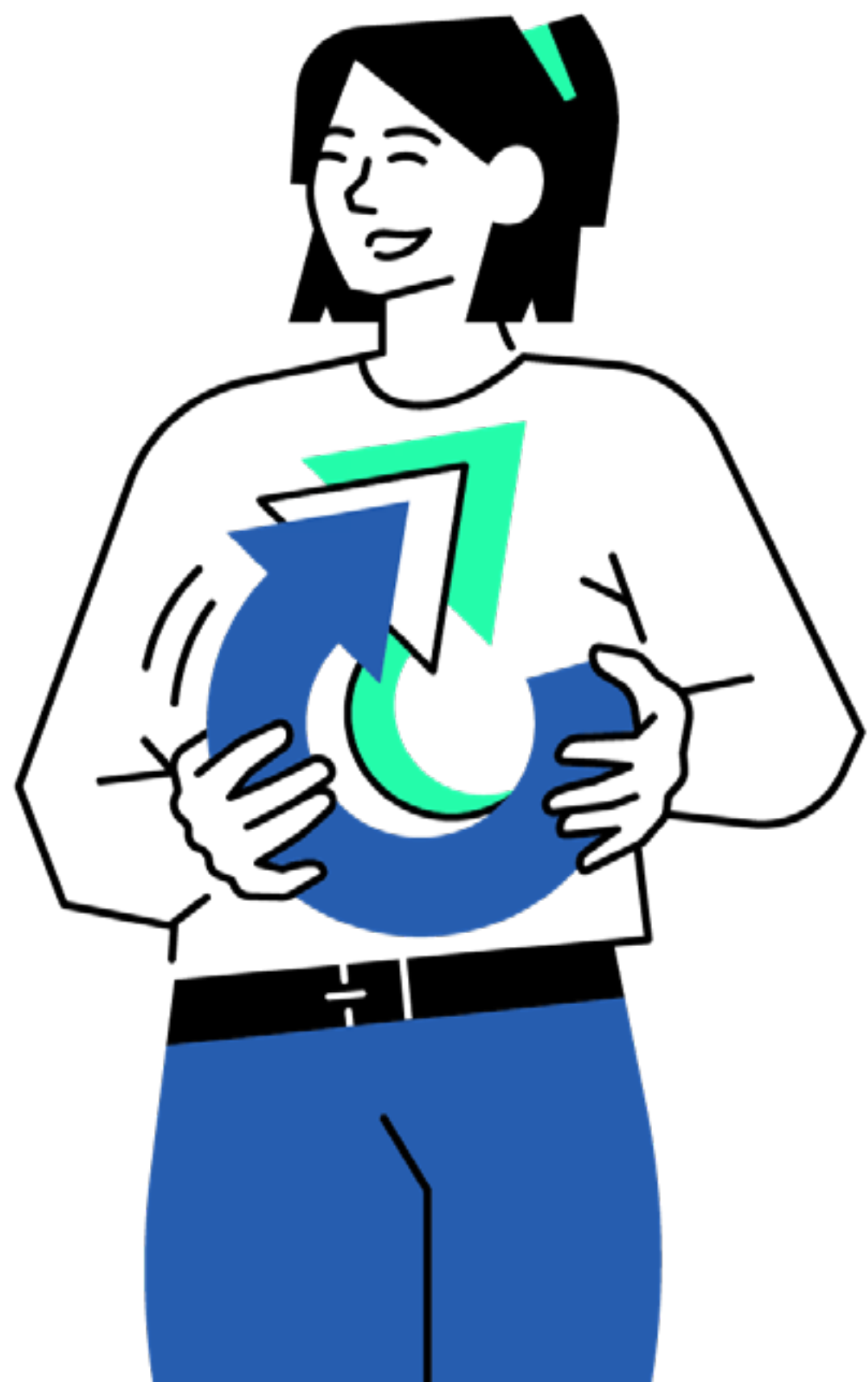


Our Key ESG Drivers

Environmental
Protect our Planet



Social
Empower our Community



Governance
Steer our Impact



Protect our Planet

We take action against climate change and air pollution, support the circular economy and reduce water use.

Our pledge to Protect our Planet is defined by three impact domains:

- **Climate Action and Air Pollution:**
Promoting sustainable mobility by leasing ecofriendly, low-emission vehicles and reducing our own carbon footprint.
- **Circular Economy:** Leasing products designed for longevity, reusability and resource efficiency.
- **Reduce Water Use:**
Prioritising water-efficient car washing.



Empower our Community

We aim to be a responsible inclusive employer that takes action on road safety and gives back to the community.

Our pledge to Empower our Community is defined by three impact domains:

- **Responsible Inclusive Employer:**
Fostering a workplace where everyone feels valued and respected by living our commitment to inclusivity, equal opportunity and wellbeing for all colleagues.
- **Road Safety:** Creating safer roads through tools and solutions that protect people and promote safetyconscious habits.
- **Community Engagement:** Applying our expertise and volunteering hours to support initiatives and foster sustainable, positive impact.



Steer our Impact

We take accountability, apply strong business ethics, encourage our stakeholders and provide transparency.

Our pledge to Steer our Impact is defined by three impact domains:

- **Business Ethics:** Building trust through integrity, transparency, and accountability.
- **Customer & Supplier Engagement:**
Cultivating lasting partnerships through open dialogue, fostering mutual understanding, collaboration, and shared growth.
- **ESG Governance:** Making transparent, responsible decisions that create sustainable value and longterm resilience.



Protect our Planet

Climate Action and Air Pollution

When it comes to our climate action goals, we have two key aims: to reduce our own carbon footprint and empower our customers to do the same.

We aim to reduce our Scope 1 emissions by 90% and our Scope 2 emissions by 80% in 2030 compared to our base year 2022.



Our carbon footprint in 2025

Throughout the year, we continued to reduce our environmental impact and improve the accuracy and quality of our emissions data.

In 2025, the gross carbon emissions from own operations totalled 2,741 metric tons of CO₂ equivalent (CO₂eq) on a Group level. This comes to a 20% increase when compared with 2024 (2,189 metric tons of CO₂eq), and excludes downstream Scope 3 emissions of our customer fleet. Our customer fleet produced 1,367,575 metric tons of CO₂eq. That is almost 100% of our overall calculated carbon footprint.

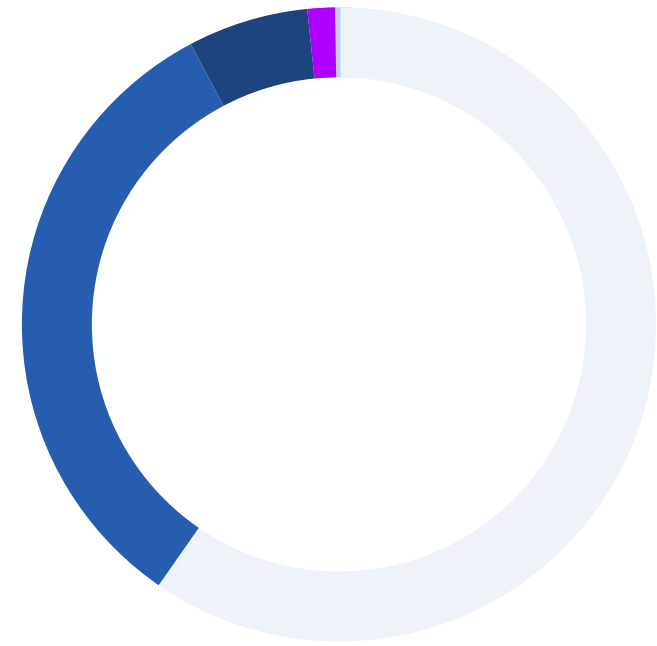
To reduce our environmental impact, we offset all Scope 1, 2 and 3 emissions from our own operations, such as employee travel, fuel and heating. To keep our operations net carbon-neutral*, together with the global sustainability team and Center of Competence (CoC) for CO₂ Compensation at Mercedes-Benz AG, we invest in certified offsetting projects.

We are proud to say that all Athlon offices and locations are net carbon-neutral* and we are decreasing emissions over time:

- In 2025, 88% of the electricity used in our offices was renewable, up from 77% in 2024. For all of our non-renewable energy, guarantees of origin will be bought.
- Emissions from fuel and heating will be offset.
- We prioritise energy-neutral or energy-friendly real estate.

* Net carbon-neutral means that carbon emissions that have neither been avoided nor reduced at the Athlon Group are compensated for by certified offsetting projects.

Carbon footprint



Emissions from own operations

- 59.81% Business travel
- 32.67% Commuting
- 6.06% Fuel and heating
- 1.36% Electricity
- 0.11% Waste and Water

Metric ton CO ₂ -eq.	2025	2024	2023	25 vs. 24	25 vs. 22 (base year)
Scope 1	1,315	1,098	1,416	20%	-59%
Business travel	1,260	1,012	1,330	24%	-58%
Fuel and heating	55	86	86	-36%	-74%
Scope 2	428	391	519	9%	-34%
Business travel	280	213	303	31%	-17%
Electricity	37	119	142	-69%	-83%
Fuel and heating	111	60	74	85%	18%
Scope 3	1,368,574	1,758,703	1,626,537	-22%	-23%
Business travel	100	81	132	23%	-44%
Leased assets	1,367,575	1,758,623	1,626,405	-22%	-23%
Commuting*	895	615		46%	
Waste and Water*	3	4		-24%	
Grand total CO₂-emissions	1,373,058	1,959,463	1,630,540	-30%	-23%
Net carbon emissions	1,370,317	1,957,274	1,628,472	-30%	-23%

* Commuting, Waste and Water not measured in 2022 and 2023

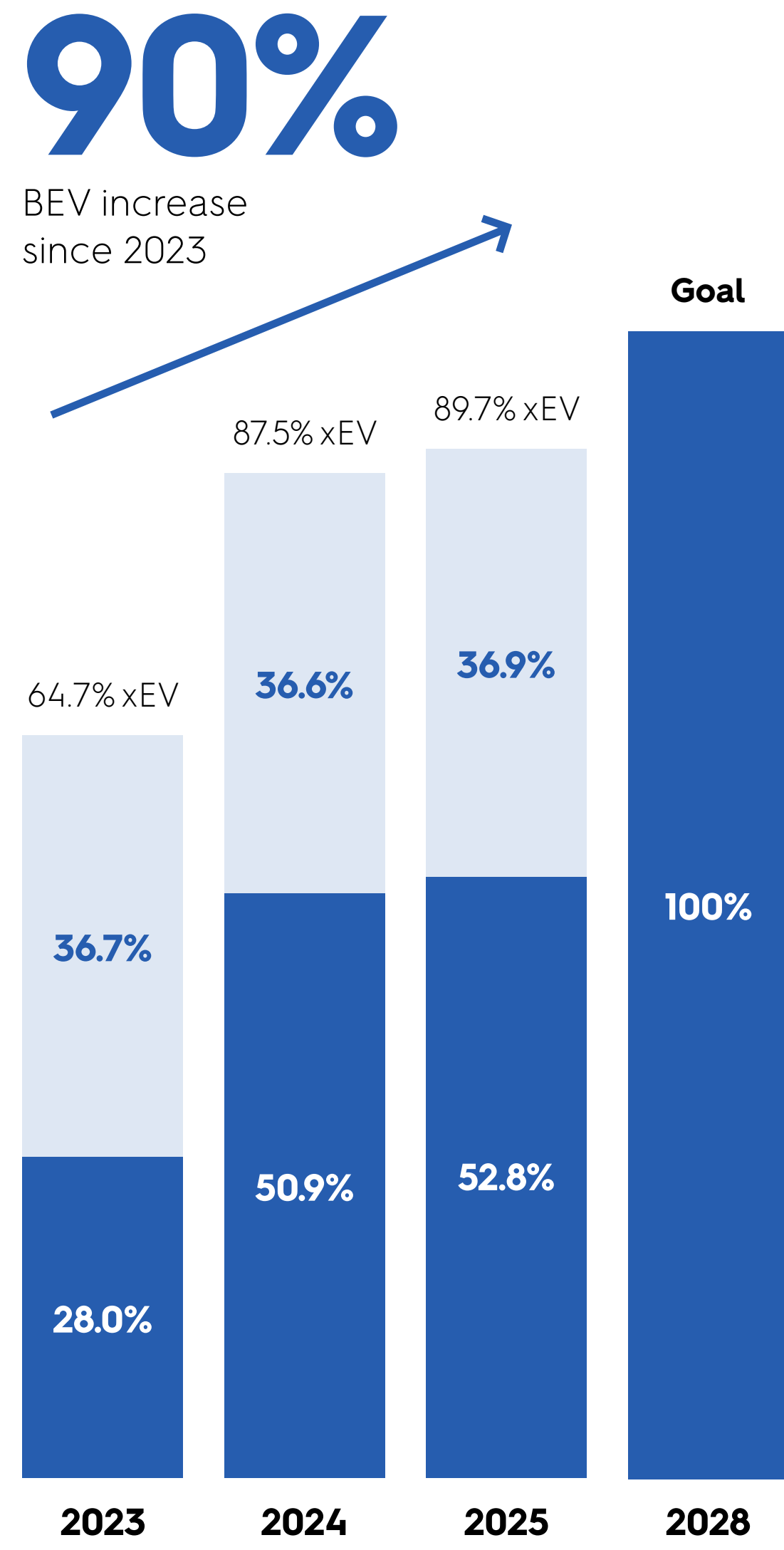
Powering change with electricity

Our employee fleet

We are firmly on track to reach a 100% xEV employee fleet by the end of 2026. In the reporting year, 90% of our employee fleet consisted of xEVs, up from 88% in 2024. This reduced our average tailpipe CO₂ emissions per vehicle from 33 gr/km to 30 gr/km. We have the target to reach 0 gr/Km CO₂-eq. tailpipe CO₂ emissions by 2028.

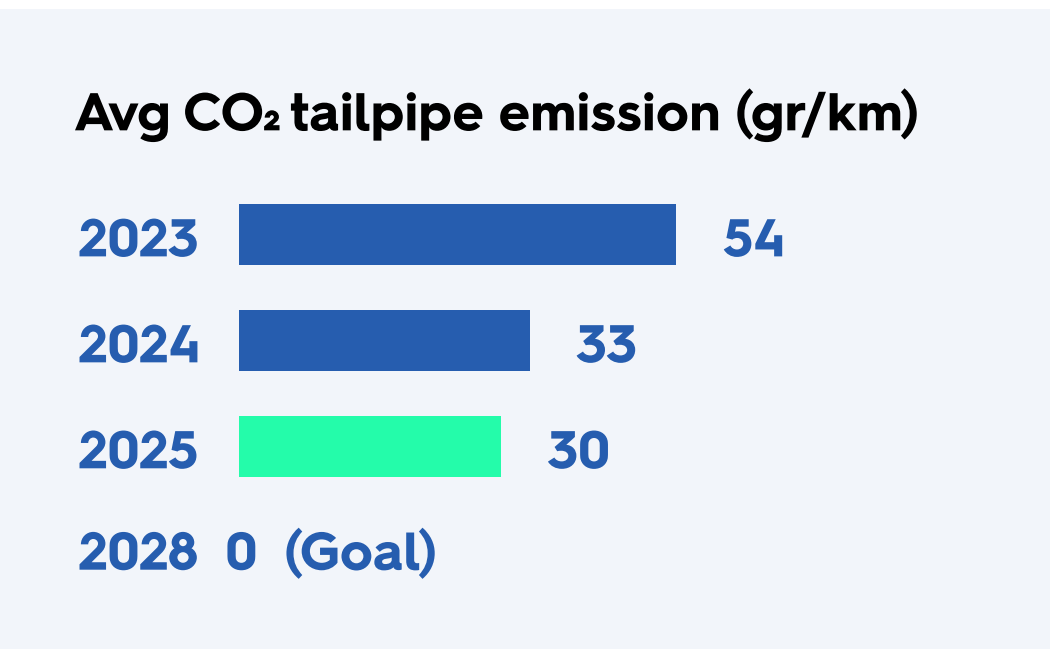
We aim for a fully battery electric (BEV) fleet by 2028. In 2025, BEVs made up 53% of our employee fleet, up from 37% in 2024, which is driven by BEV-only policies across multiple Athlon markets. We have seen this shift inspire change across the wider group. In fact, our employee fleet accounted for less than 0.3% of our gross carbon footprint in 2025.

We continue to eliminate CO₂ emissions from vehicle charging by using energy from renewable sources. With Athlon Charge, our proprietary smart charging solution in the Netherlands, we can monitor and optimise charging practices, keeping our fleet’s energy consumption as sustainable as possible.



Powering change in the UK

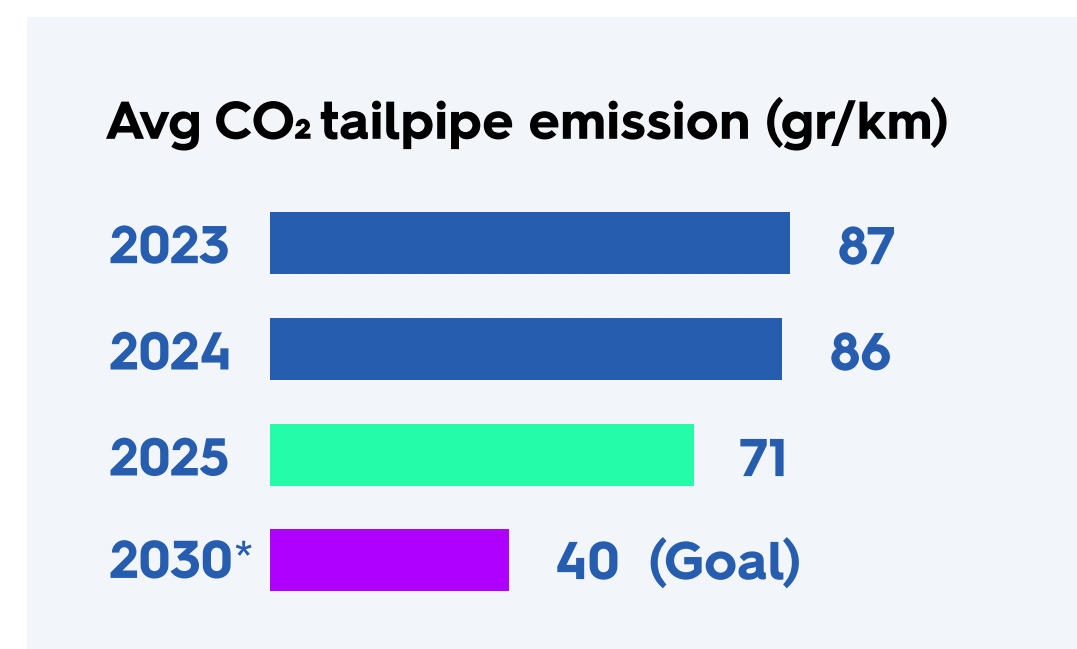
Athlon UK superpowered its charging infrastructure in 2025 by expanding its on-site capacity. With 65 standard EV chargers (7-11 kWh) and nine fast chargers of up to 50 kWh, most of which can serve two vehicles at once, the current capacity on site is around 140 points. There is pre cabling installed for an additional 50 chargers in future.



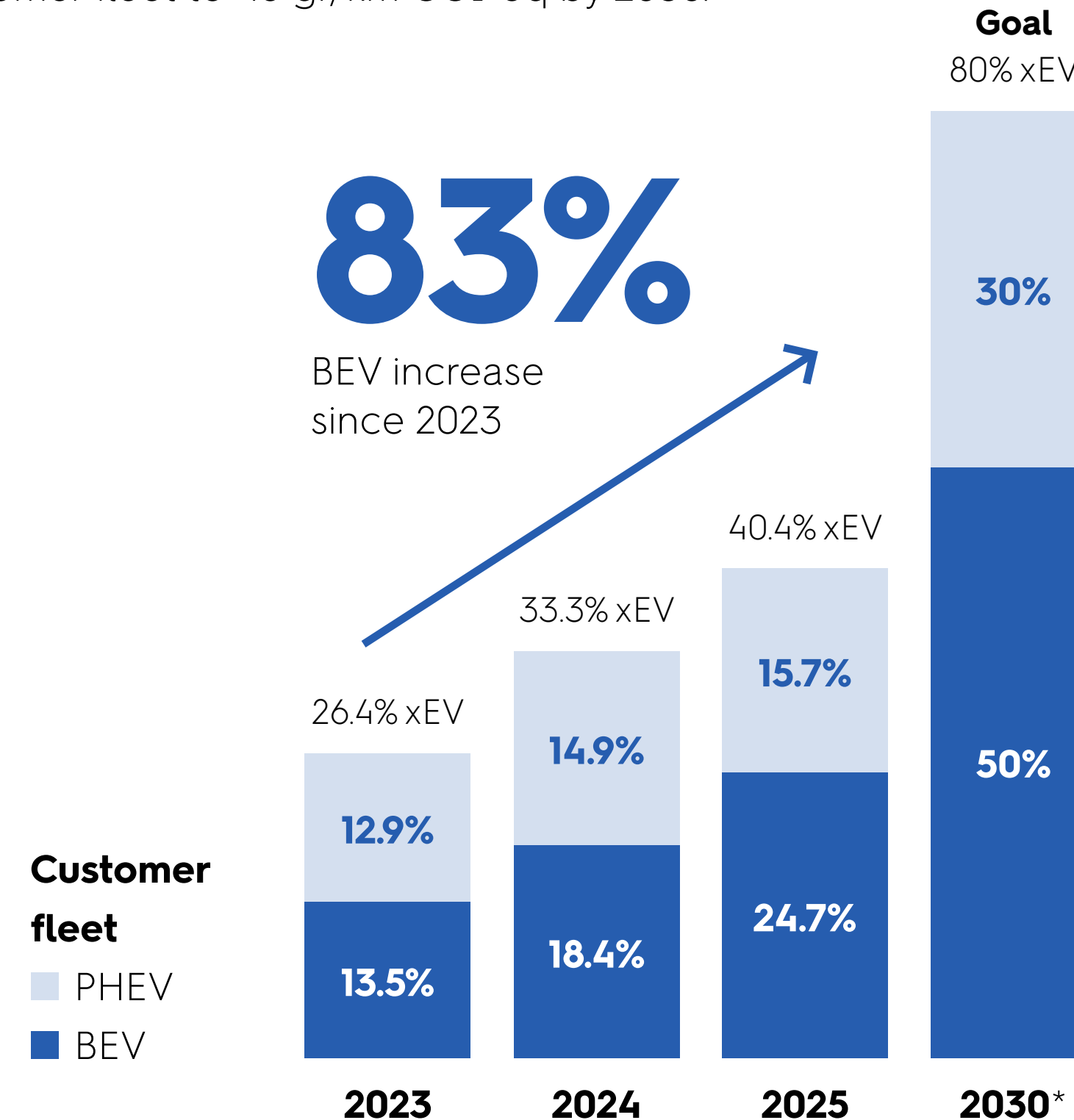
Our customer fleet

The biggest environmental impact stems from our Scope 3 downstream emissions – this is mainly CO₂ from vehicles that are not fully electric. In 2025, these emissions totalled 1,368,574 metric tonnes of CO₂eq, making it a key priority for change. We lead by example with our employee fleet, and we are equally committed to supporting our customers in their transition to electric vehicles. Our ambition is clear: by 2030, we aim to achieve a 50% BEV customer fleet, with 80% xEV overall*.

Working in close collaboration with our customers, we continue to develop tailored solutions that help them reduce their environmental impact in line with our sustainability goals. We do this by making it easy and beneficial for our customers to transition to a full electric fleet through initiatives such as Athlon Charge, which uses renewable electricity. In less EV-developed markets, we share our knowledge through online and on-the-road training.



By the end of 2025, 40% of our total customer fleet consisted of xEVs, up from 33% in 2024. BEV represented 25% of the overall customer fleet, compared with 18% in 2024. Belgium is leading the way, with more than 80% of new orders placed for BEVs. Next in line are the Netherlands, Luxembourg and the UK, where 50% of all new orders were for BEVs. As a result, the average tailpipe emissions per vehicle decreased from 86gr/km to 71gr/km CO₂-eq. Our Group ambition is to reduce the average tailpipe emissions per vehicle in our customer fleet to 40 gr/km CO₂-eq by 2030.



Championing alternative mobility in France

At Athlon France, the team has expanded and actively encouraged the use of Car2Use and BikeLease, with excellent results.

The Car2Use carsharing solution, developed with MTG Mobility Tech Green, has shown steady growth since the post-COVID period as organisations seek flexible, sustainable and efficient mobility options. Athlon BikeLease, in partnership with ECOX, provides a wide range of electric bike models as a low-carbon alternative for daily commuting.

Shaping the EV conversation in Poland

The team at Athlon Poland gave presentations at national EV Roadshows on the challenges and benefits of integrating electric vehicles into corporate fleets. They discussed financing strategies and factors that influence drivers' willingness to switch, helping organisations to make informed steps toward electrifying their fleets.

* Depending on market conditions



Measuring and monitoring our carbon footprint

In 2025, we used an external tool to calculate our carbon footprint. Starting in 2026, we calculate our carbon footprint internally. This gives us even faster and better insights into our upstream and downstream value chains, in particular for Scope 3 emissions. To ensure up-to-date information we gather data from all Athlon markets every month. Furthermore, we calculate our CO₂-emissions according to the GHG-Protocol.

Climate risk assessment

Our first comprehensive physical climate risk assessment across all office locations was conducted in 2024. This was done to assess risks from extreme weather events that could impact both our operations and those of our customers. The assessment confirmed that there were no significant physical risks to our operations. We plan to update the climate risk assessment in 2026.

Air pollution

We aim to mitigate climate change while reducing air pollution. By increasing the share of electric vehicles in our fleet, we reduce tailpipe emissions, nitrogen oxides (NOx)

and volatile organic compounds (VOCs). Electric vehicles also reduce certain non-exhaust emissions, particularly from brake wear, due to the use of regenerative braking. Through our road safety solutions, we train employees and customers in efficient electric driving and the effective use of regenerative braking, which reduces reliance on mechanical brakes and therefore lowers particulate matter emissions (PM10 and 2.5).

Growing forests, growing impact

Every new colleague who joins Athlon receives a certificate for two planted trees. One tree is planted in a sustainable forestry project in Borneo, and the other in the Netherlands. In 2025 alone, we planted 400 trees together with TreesforAll. Why is this so important? Because the world needs more forests. Forests help improve the climate, absorb CO₂, protect biodiversity, and create healthier living environments.

In 2025, we continued to look for new ways to extend circularity at Athlon, working closely with our teams in procurement and repair and maintenance to identify where we can evolve our processes and purchasing.

For example, we have set a clear standard to work exclusively with A-type tyre manufacturers. Our suppliers publish their own sustainability reports and actively invest in research on sustainable tyre materials, demonstrating a strong ESG performance that feeds into our own.

Used tyres are given a second life through reuse – in line with safety regulations, of course – across several Athlon markets, eliminating approximately 602 tons of CO₂ emissions in 2025 alone.

We are proactively working to expand these initiatives across all our markets, safe in the knowledge that, by extending the lifespan of materials, we both reduce waste and significantly lower our environmental impact. A winning formula.

Procurement

In 2025, we made significant progress in sustainable procurement. We updated and strengthened the Athlon International Procurement Policy, further embedding ESG criteria into the policy. All procurement teams received ESG training, supported by local workshops to translate sustainable procurement strategy into concrete actions. 50% of entities included ESG criteria in non-car supplier selection during the tenders. In the Netherlands, 40% of suppliers (car-related) were assessed on ESG performance. These assessments were complemented by capacity-building efforts, such as supplier engagement sessions focussed on sustainability topics. We now plan to expand this supplier assessment to the remaining suppliers, as well as across all markets.

Ditching disposables in France

In September 2025, Athlon phased out disposable cups and introduced reusable mugs for all employees. Since then, colleagues have used their own mug daily, leading to a drastic reduction in single-use cup consumption across the organisation, supporting a more circular and waste-conscious workplace.

Reducing Water Use

In the Netherlands, we use rainwater at the stations where end-of-lease vehicles are washed. This has saved over 1 million litres of water every year since 2011. In 2025, rainwater accounted for over 50% of all water used for washing the vehicles. We continue to upgrade this system to collect even more rainwater in the future.

In Belgium, recuperated water accounted for 80% of all water used to wash vehicles, saving well over 1 million litres of water as well.

Across our buildings, we are continuing to track water consumption, bringing in new water saving initiatives. In Belgium and the UK, our toilets flush with rainwater and, in Spain, one of our initiatives is a new, more efficient façade cleaning procedure that significantly reduces water consumption while keeping everything clean.



Empower our Community



A responsible and inclusive employer

At Athlon, we believe that people thrive when they feel supported, respected and safe. As a responsible employer, we invest in the physical and mental vitality of our colleagues, creating conditions for sustainable performance and long-term wellbeing.

Inclusion is a fundamental aspect of how we work. Our organisation brings together a wide range of backgrounds, perspectives and experiences, and we value the strength that this diversity brings. Through our commitment to diversity, equity and inclusion (DEI), we strive to ensure that every colleague feels welcomed, heard and empowered to thrive.

We foster an environment where open dialogue is encouraged and where concerns can be raised confidently and constructively. By prioritising wellbeing, DEI and a supportive culture, we are continuing to build a workplace where people can develop, grow and succeed.

Diversity data: meet our employees

Gender

45%

of Team Athlon are women
(up from 44%)

30%

of all leaders are women
(up from 29%)

36%

of top leaders are women
(up from 23%)

Generations

24%

Leaders younger than 40
(down from 26%)

44

Average age
(equal to 2024)

6%

Generation Z
(down from 7%)

44%

Millennials
(equal to 2024)

40%

Generation X
(up from 39%)

10%

Baby Boomers
(up from 9%)

Culture

47

Nationalities
(down from 49)

10

Countries with a direct presence
(equal to 2024)

Athlon’s diversity

We constantly aim to make progress towards a balanced and diverse workforce in 2025. The overview reflects how our demographics have changed since 2024, proudly highlighting the 13% increase of women in top leadership.

More than just diversity figures

While DEI numbers are great for helping us measure our diversity and identify opportunities for improvement, statistics can never truly reflect an inclusive culture. At Athlon, we know that real inclusivity unlocks potential and collaboration, fuels innovation and attracts top talent.

That’s why we work hard to make sure that everyone – regardless of gender, age, beliefs, ethnic origin, disabilities, neurodiversity, sexual orientation or political stance – feels seen, heard and empowered.

Feeling seen and heard

Inclusion at Athlon is supported by our speak-up culture, which is based on trust, openness and psychological safety.

All employees can value Athlon’s culture with annual employee engagement surveys. The 2025 Engagement Survey showed stable and positive results, confirming our strong foundation of belonging, flexibility, health and ethical conduct.

Results of employee engagement survey (score out of 5)

Overall satisfaction	3.95
Trust level	4.20
Gallup Q12 score (this reflects growth opportunities, teamwork, management support and basic needs)	3.77
Participation	78%
Other highlights include:	
Inclusion	4.22
Flexible working	4.28
Health and wellbeing	4.03
Integrity and compliance	3.98

In addition to surveys, our speak-up culture combines formal and informal structures to enable our teams to have open, honest and constructive conversations about important matters and make their voices heard.

- All Athlon markets have confidential advisors as a safe, independent point of contact for sensitive questions, concerns or dilemmas.
- We have ESG representatives in every market, as well as a cross-market Change Maker Network, so that employees can actively contribute to our environmental, social and governance initiatives.
- Senior leaders, including Managing Directors, the Group CEO and CIO, organise informal in-person and online sessions for colleagues across the company to help break down hierarchical barriers and encourage openness.

Equity as empowerment

At Athlon, we believe that true equity means providing everyone with the support they need to grow: not the same support, but the right support.

We make sure every person has access to learning and development opportunities, flexible guidance and resources. Everyone deserves the tools to thrive, regardless of their role, background, location or stage in life. Empowerment also includes fair treatment and respect.

Learning and development

We know that learning and development are key enablers of empowerment. That is why we made these aspects a priority in 2025, continuing into 2026.

Learning & development results

Professional & skill development

4,749

trainings
(avg. 2.9 per team member)

Mental wellbeing courses

638

Mandatory training hours

3,954

(data privacy, compliance, integrity at work)

Leadership programmes

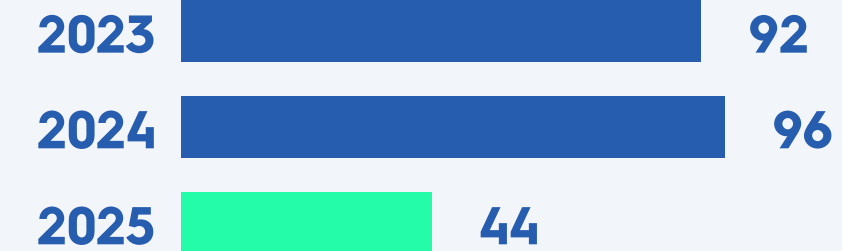
121

(supporting current & future leaders)

Number of internships



of which active interns at 31-12





Individual Development Plans (IDPs)

Every Athlon team member is encouraged to create an Individual Development Plan (IDP) with their manager. These plans are designed to help employees thrive, defining actionable steps related to performance, personal growth and career development. In 2025, the IDP completion rate was over 60% for all employees, working towards our goal of 100%.

Flexible work and autonomy

Empowerment also means enabling colleagues to balance work and personal responsibilities in a way that fits their individual circumstances. Our flexible workplace score of 4.28 out of 5 in the 2025 Engagement survey reflects this. We support diverse needs through a 50/50 hybrid model and a working environment that accommodates different working styles, including those of caregivers and neurodiverse colleagues. In addition, our flexible benefits budget allows colleagues to tailor their package, from additional holidays to mobility choices, pension contributions or salary.

Championing change in the Benelux

In the Benelux, Athlon strengthened its efforts through the DEI Changemaker Network. In 2025, two communities, NextGen@Athlon and YoungParents@Athlon, were launched to connect colleagues in similar life stages. These groups play an important role in creating safe spaces, strengthening underrepresented voices and fostering peer support across Athlon.

Accessibility and inclusivity in Italy

In Italy, Athlon hosted the interactive workshop Feel How I Feel (Senti Come mi Sento), delivered with volunteers from the Italian Multiple Sclerosis Association. Through hands-on exercises and guided reflection, employees explored what it means to live with an invisible disability, and how empathy and attentive listening can improve everyday interactions, helping to build a workplace where everyone feels welcomed, represented and free to express themselves.

Fair treatment and respect

Fair treatment and respect are essential to a healthy and an empowered workplace. At Athlon, discrimination, harassment and inappropriate conduct are not tolerated, and we ensure this through clear standards and the right support systems. All colleagues complete our integrity@work training on discrimination and harassment, equipping them with the knowledge to recognise and address unacceptable behaviour. We also maintain whistleblower mechanisms in every market, giving employees the opportunity to raise concerns anonymously and securely whenever needed. In addition, confidential advisors are available to offer guidance and provide a safe space to discuss sensitive matters.



Celebrating excellence in the UK

In the United Kingdom, Athlon celebrated Alicja Nawrocka, who was shortlisted for Apprentice of the Year at the Women in Tech Excellence Awards, highlighting both Alicja’s extraordinary talent and Athlon UK’s efforts to promote gender diversity and early-career development in technology.

Creating equal opportunities in the Netherlands

In the Netherlands, Team Athlon achieved PSO Trede 2 (Second Tier), through the Prestatieladder Sociaal Ondernemen (PSO), the Dutch national benchmark for social entrepreneurship. The PSO assesses how organisations create employment opportunities for people in a vulnerable position within the labour market. This second tier signifies that Athlon performs above the Dutch average.

Vitality

Our Vitality program empowers employees to take ownership of their physical and mental wellbeing. Athlon supports this by offering accessible programmes and initiatives on lifestyle, mental resilience, work-life balance and long term health. We believe that investing in these areas helps to create a healthy and supportive working environment, where team members feel energised, balanced and ready to thrive, both at work and beyond.

Mental wellbeing

Supporting mental wellbeing is a core principle of Vitality. All team members and their families have access to an online platform offering a wide range of resources, from mindfulness and stress management training to resilience tools and one on one support with certified professionals.

Physical health

At Athlon, we are committed to a safe, healthy and ergonomically sound work environment, supported by our formal Health & Safety policy, with clear roles and responsibilities both at country and group level. All operational sites conduct periodic risk assessments, and in 2025, 100% of sites completed a health and safety check. These assessments shape our preventive measures and improvements to offices, safety procedures and ergonomic conditions.

As part of this, we promote healthy routines with ergonomic resources and local activities, such as walk-and-talks, sponsored sports and other initiatives designed to support physical activity and long-term wellbeing.



Connection and wellbeing in Germany

At this year’s B2Run in Düsseldorf, 38 Athlon colleagues laced up their shoes and joined more than 15,000 participants for a 6.2km run around the Merkur Spiel Arena. With perfect weather and enthusiastic support from colleagues cheering along the route, the event was a celebration of energy, team spirit and wellbeing. The day ended with sunshine, good food, cold drinks and plenty of smiles: a great example of how we bring movement, connection and wellbeing to life at Athlon.

Combining vitality with charity in Spain

Our colleagues in Spain took part in the Ponle Freno charity race in Madrid, an annual event dedicated to raising road safety awareness and supporting the victims of traffic accidents. The event opened with a moment of silence to honour victims, followed by the start of the 5km and 10km races. Everyone completed the 5km route and two of our more ambitious team members took on the full 10km course – a great achievement for a meaningful cause.



Winning awards in the Netherlands

In 2025, Athlon Netherlands won the OpenUp Wellbeing Award in the Large Enterprise category, beating 143 other organisations. The jury highlighted Athlon’s ability to make wellbeing tangible, highlighting initiatives such as volunteer days, vitality and mental health support. This achievement is driven by Athlon’s Vitality Team, which works throughout the year to make physical and mental health support accessible for all employees.

Heart health in the Netherlands

During the Week of the Heart, Athlon Netherlands focussed on cardiovascular health with a mixture of awareness and practical activities, including cardio resuscitation (CPR) training from the Dutch Red Cross, information sessions on women’s heart health and sharing personal experiences. Activities included a heart-themed walk, a heart friendly menu in the company restaurant, and OpenUp meditation and relaxation sessions.

Award-winning wellbeing in Italy

In 2026, Athlon Italy received an award for its project, Athlon Wellbeing: Your Health, Our Commitment. This integrated model combines healthcare and telemedicine, psychological, legal and social support, as well as extended benefits for employees’ families, offering concrete tools for physical, mental and emotional health.

Help at hand in Italy

Over six months in 2025, Athlon Italy offered The Red Desk, a confidential online counselling space open to all employees. Guided by a professional counsellor, it provided up to two individual 60-minute sessions per person, offering support with everything from emotional regulation and interpersonal conflict to stress management, work-life balance and self-development.

Road Safety

We are committed to road safety, offering a range of technological solutions alongside in-person and online driver safety training. With an international fleet of around 400,000 vehicles (500,000 including our partner network), we take road safety seriously, for our customers and their employees, our own teams and everyone on the road.

En route to safer roads

In Europe, we are working towards the long-term EU Vision Zero objective of zero road fatalities by 2050. In line with this objective, we aligned our road safety ambition to decrease the number of accidents caused by Athlon vehicles.

Fewer accidents

The number of accidents involving Athlon vehicles has steadily declined over the last years. The share of accidents relative to the total insured fleet decreased from 30.1% in 2023 to 27.6% in 2024, and further to 26.5% in 2025.

This trend reflects the effectiveness of preventive measures we offer, including (online) driver training and awareness programmes as well as our digital solutions, combining data insights with practical support.

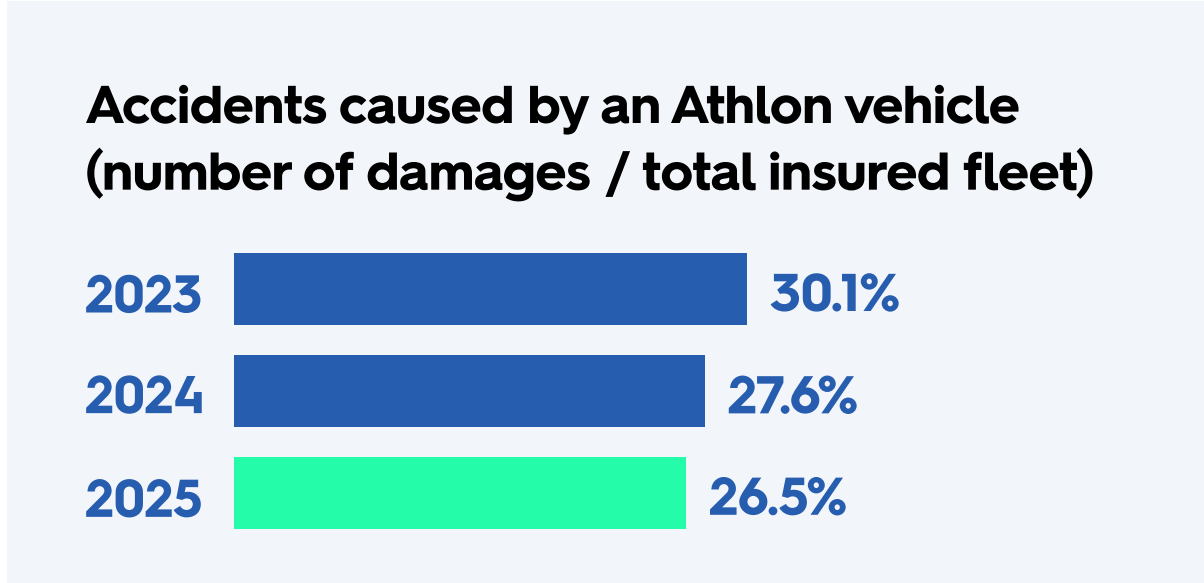
Athlon e-Driver

Our road safety programme in the Benelux continues to be a key element of our mission to provide employees and customers with the knowledge and skills to stay safe on the road. Our dynamic online platform offers bite-sized online training modules on safe driving, new technologies,

electric vehicles and more. Following a successful pilot in Belgium and Luxembourg in 2024, we extended the e-Driver programme to Belgium in 2025.

Here are the figures:

Athlon e-Driver training sessions completed	6,984
Team members with an account	783
Team members who completed at least one training	58%
Employees who completed all 2025 training modules	14%





Advanced driver training in Poland

In 2026, Athlon Poland provided practical, hands-on training to 72 drivers representing Athlon customers, in cooperation with Mercedes-Benz Polska. Participants enjoyed full-day road safety training sessions with experienced, certified instructors, focussing on strengthening real-world driving skills, such as skid control, defensive driving and effective braking. They also received an introduction to electric vehicles and a refresher on eco-driving principles.

Sharing knowledge in the UK

Teams at Athlon UK continued to raise awareness through knowledge sharing and external collaboration, in close cooperation with Brake, the UK road safety charity. Together, they promote and produce regular road safety guidance for both team members and customers.

Leading the conversation in the Netherlands

In the Netherlands, Athlon helped organisations to improve their road safety by launching a dedicated white paper on the topic. Combining accident and damage statistics with concrete steps for organisations, it outlines key safety challenges – including the impact of new driver-assistance and self-driving technologies – to provide a clear, actionable checklist for employers and employees.

Starting road safety education early in Germany

Our colleagues in Germany welcomed their children to the office for a fun, hands-on introduction to Athlon’s culture. The day focussed on learning through play, with activities like wooden car painting, Bobby Car races and remote-controlled driving – memorable shared moments that help children to understand the basics of road safety early on. Beyond the smiles, the event showcased our commitment to an inclusive, family-friendly culture where everyone, big and small, feels welcome.

Community Engagement

At Athlon, every team member has the opportunity to volunteer and give back to society aligned with our core values and strategy. By actively contributing their time and effort, they help to create meaningful and lasting impact within our local communities.

Participation Rate

29.5%
of our team participated in volunteering activities
(up by 22.1% compared to 2024)

554
active volunteers in total
(up by 34%)

2,884
total hours of volunteering recorded
(down 6%)

5.2 hours
spent on average per volunteer on their activity
(down from 7.4 hours)

Impact by Global Action Field

Our Community Engagement strategy is guided by four Global Action Fields. These help us to steer our volunteering efforts towards the UN SDGs (Sustainable Development Goals).

Our Global Action Fields convert our social and environmental ambitions into concrete, measurable community impact.

- **Improved Living Conditions (social community projects):**
47 initiatives, 2,138 hours
- **Decarbonisation (climate and environment):**
12 initiatives, 598 hours
- **Quality Learning (education and skills development):**
3 initiatives, 96 hours
- **Circularity & Conservation of Natural Resources:**
2 initiatives, 52 hours



Spring cleaning in Poland

In March, for the International Day of Happiness, our team volunteered at the Intervention Pre-Adoption Centre in Otwock. We prepared the garden area for summer, washed floors, organised shared spaces and tidied storage areas to maintain a clean and welcoming environment for children and staff. We were even able to accompany the children on walks in the sunshine to enjoy time outdoors together.

Supporting donations in the UK

Athlon provided crucial support, including free road safety and EV training, fleet management, and data insights, for the donation of 100 eSprinter vans by Mercedes-Benz Vans (MBV) and the National Family Centre/Multibank. These vans were distributed to Multibank sites across the UK, with each eSprinter saving over 2,500kg of CO₂ annually compared to diesel models.

Sponsoring new futures in Spain

Athlon Spain funded driving licences for two individuals in disadvantaged situations, selected by Caritas. We hope their new licences will help them find employment and build a more independent, fulfilling life.

Steer our Impact



Building on Business Ethics

At Athlon, ethical conduct is the foundation of everything we build. All our actions are guided by our core values, ESG strategy, and the Mercedes-Benz Integrity Code, championing transparency, data privacy and security, and ethical procurement. It's more than just ticking boxes - it is our way of cultivating trust, loyalty and motivation with customers, colleagues, suppliers, partners and our wider community.

Compliance with legal frameworks and internal regulations is a paramount priority for us. That is why we have implemented a comprehensive Compliance Management System (CMS) to proactively identify compliance risks at an early stage, giving us everything we need to make the right improvements at the right time. This covers issues from corruption prevention, social compliance and antitrust regulations to data and digital compliance. We are proud to say that our team members rate Athlon's integrity and compliance at 3.98 out of 5.

Compliance and ethical awareness start with our teams, so we have mandatory e-learning modules across all Athlon markets. These carefully created modules cover ethical behaviour and

a wide range of compliance topics. In 2025, team members dedicated nearly 4,000 hours to completing them, with completion rates ranging from 97.3% to 100%.

Integrity training completion rate

98.4%



To enable us to take quick and appropriate action in cases of misconduct, both Mercedes-Benz and Athlon operate a robust whistleblower system. It allows employees and external parties to report breaches confidentially, preventing potential damage to Athlon, our team and other stakeholders. It is a vital instrument of good corporate governance, alongside quarterly reports on cases received and actions taken.

Engaging with Customers and Suppliers

Our ESG Strategy depends on alignment with our entire Athlon community, which includes our customers and suppliers. We know that they have a key role to play within our shared value chain, so we actively work with them to align on our ESG objectives. We use surveys, one-on-one meetings and dedicated sustainability dialogues with both our upstream and downstream value chain partners to gather invaluable feedback and work collaboratively towards our ESG objectives.

We also make sure that our customers and suppliers know how important they are to our ESG goals – as strategic partners, rather than just stakeholders. Keeping our partnerships active and engaged is key to fostering collaborative innovation and embedding sustainable practices across all our operations.

Working with our suppliers, we champion the adoption of our responsible sourcing standards across the network, aiming to elevate sustainable practices and set clear expectations in critical areas such as working conditions, human rights, environmental and safety protocols, business ethics and compliance.

ESG Governance

Our commitment to ESG principles is a vital part of our long-term strategy and core values. Our Executive Committee holds ultimate responsibility, while our ESG Steering Committee actively reviews risks, opportunities and performance metrics.

We follow clear policies and codes of conduct that guide ethical behaviour, as well as ensuring robust risk management, data protection, respect for human rights and compliance with laws and regulations.

Our ESG governance framework is built on clear, long-term commitments that drive sustainable value creation. As our previous commitments came to an end in 2025, we defined new long-term objectives for 2030 that provide a clear roadmap for enhancing our environmental performance, strengthening our social impact and maintaining our high standards of corporate governance.

We track our progress through defined Key Performance Indicators (KPIs) – which you can see on our scorecard – and internal reporting mechanisms. We regularly review our governance practices to keep pace with evolving regulatory requirements, stakeholder expectations and best practice.

With this forward-looking approach, we are driving responsible growth, managing risk and creating enduring value for all stakeholders.

In 2025, we used our Athlon ESG Steering Committee meeting to align our sustainability strategy and progress with Mercedes-Benz. Instead of publishing a separate CSRD aligned report for the Athlon Group, we shared all the necessary data in the Mercedes-Benz Group Sustainability Report (see chapter 8).

Committing to collaboration in the Netherlands

In 2025, we connected with key car-related suppliers to explore joint ESG objectives and identify opportunities to work together to reach our collective sustainability ambitions. We also conducted a comprehensive survey among several car-related suppliers, giving us valuable insights to work with in the future. The initiative was such a success that we have committed to scheduling follow-ups in 2026 to deepen our collaborations.

Our Policies

Data Protection

In the digital era, data serves as the backbone for both our partners and our internal frameworks. Athlon has crafted a Data Protection Strategy rooted in the EU's Global Data Protection Regulation (GDPR), which is implemented across all Athlon markets. In accordance with Article 17.2 of the GDPR and our overarching Global Data and Information Policy, safeguarding data is embedded in our day-to-day operations.

Athlon International Code of Conduct

We foster trust-based relationships and unequivocally condemn and discipline any bribery-related activities, whether they involve offering or receiving bribes. Our International Code of Conduct is included in Appendix 4 of this report.

Our Integrity Code

Our commitment to business ethics is unwavering at the corporate level. Our Ethics and Integrity Framework promotes ethical behaviour, honesty in business, integrity, and adherence to best practices.

We maintain stringent corporate protocols to prevent corruption and bribery, ensure compliance with laws, foster fair competition, and address related concerns.

Four-Eyes Principle and Segregation Policy

Our Four-Eyes Principle Policy ensures that critical actions, such as significant decisions or financial transactions, are validated by at least two individuals. This policy complements duty separation, which prevents any single employee from having the opportunity to perpetrate or conceal fraud during their regular responsibilities. These principles also protect our organisation from damages stemming from illicit activities. The entire Mercedes-Benz Group is dedicated to minimising risks of fraud and improper conduct. Each local governance entity bears the responsibility for its own internal controls and the application of these principles.

Anti-Money-Laundering (AML) Policy

Our comprehensive rules and measures are designed to avoid money laundering and enable swift identification and mitigation of associated risks, thus protecting the company.

Global Data and Information Policy

Data protection and information security are paramount at Athlon, given the extent of our daily interactions with stakeholders. We ensure proper use and storage of data to prevent legal repercussions due to breaches or misuse.

Health and Safety Policy

Athlon prioritizes employee wellbeing, with a dedicated policy outlining our commitments and measures. This policy is disseminated throughout Athlon's entities and forms the basis of our health and safety initiatives.

Work-from-Home Policy

Athlon offers a hybrid work schedule, incorporating remote work as a fundamental aspect of our corporate culture, with this having been particularly emphasized during the COVID-19 pandemic. This flexibility supports our employees in maintaining a healthy work-life balance.



Global Travel Policy

Despite the prevalence of remote work, business travel remains essential. Our Global Travel Guidelines encourage sustainable travel in order to minimize our environmental impact. This has been boosted by our 2022 carbon footprint analysis, which has led to ongoing policy refinement.

Undesirable Behaviour Protocol – Works Council

We maintain a zero-tolerance stance on workplace harassment, with proactive measures to prevent it. Our Workplace Conduct Protocol outlines reporting procedures for incidents, ensuring a supportive environment for our staff.

Whistleblowing Policy and Proof of BPO (Business Practice Office) Role

Athlon’s whistleblowing procedure allows for reporting illicit activities, detailing what should be reported and to whom. It empowers employees, suppliers, and customers to report violations of the law or undesirable workplace conduct.

Human Rights Due Diligence Policy

Our human rights standards include provisions for freedom of assembly and association, prevention of child labour, free choice of employment, fair remuneration, working hours and social benefits, the prevention of discrimination and equal opportunities, as well as health and safety in the workplace.

They are applied both within our supply chains and within our own organisation.

Responsible Sourcing Standards

Since November 2020, Athlon requires suppliers to adhere to its Responsible Sourcing Standards, covering human rights, labour standards, business ethics, and environmental and safety expectations. These principles are globally enforced for both product and service suppliers, and are integrated into our contracts. Our compliance officers, in collaboration with the procurement team, actively engage with our suppliers to foster sustainable solutions. We also require suppliers to disseminate these standards down the supply chain, thereby amplifying our sustainability efforts.

Environmental and Energy Management Policy

This policy covers topics such as waste management, biodiversity, hazardous substance management, prevention of air pollution, climate protection, protection against radiation and water, and soil protection within the supply chain.

Treatment of Violations Policy

This policy governs our BPO procedure and defines the responsibilities of all parties involved. It also sets out assessment standards and consequences of any breaches.

Certified for Sustainability

The Importance of Certification

At Athlon, we are always working towards improvement. From our supply chain and communities to our impact on the planet, we look to certification to support our commitment, keep us accountable, teach us about best practices and raise the bar every year. This encourages us to work more closely with our customers, suppliers and partners to keep up our momentum in the drive towards sustainability.

In 2025, we obtained a range of sustainability certificates, both at group level and local level, some of which were new and some extensions.

Certifications

- Information security: ISO 27001 certificate (Athlon Netherlands and Athlon International)
- UNI PdR 125: 2025 gender equality certificate (Athlon Italy)
- ISO 9001 & ISO 14001 (Athlon Netherlands)
- PSO second tier status (Athlon Netherlands)

EcoVadis

EcoVadis scores companies from 0 to 100 on their sustainability practices linked to four key topics: Environmental, Labour & Human Rights, Ethics and Sustainable Procurement.

- **International:** silver medal with a score of 76/100 (up from a bronze medal with 60/100 points in 2024).
 - Environment: 83 (+13)
 - Labor & Human Rights: 82 (+22)
 - Ethics: 59 (-1)
 - Sustainable Procurement: 72 (+22)
- **Netherlands:** platinum medal with a score of 86/100 (up from a gold medal and 79/100 in 2024).
 - Environmental: 89 (+9)
 - Labour & Human Rights: 85 (+5)
 - Ethics: 80 (+0)
 - Sustainable Procurement: 88 (+18)

- **France:** gold medal with a score of 84/100 (up from a gold medal with 76/100 points in 2024).
 - Environment: 79 (+9)
 - Labour & Human Rights: 88 (+8)
 - Ethics: 75 (+5)
 - Sustainable Procurement: 87 (+7)



Co-shaping Mobility

The Mercedes-Benz Group acts in accordance with the sustainable business strategy. As a player in the transport sector, the Mercedes-Benz Group supports the Paris Climate Agreement. The Group follows the targets of the agreement and has confirmed decarbonization as a core strategic element and one of the most important strategic sustainability focus areas.

In 2020, the Mercedes-Benz Group joined the climate change mitigation promise “The Climate Pledge”, committing itself to achieving the targets of the Paris Climate Agreement ten years earlier than specified in the agreement. The medium-term emissions reduction target (Scope 1* and 2**) of Mercedes-Benz Cars and Mercedes-Benz Vans was scientifically validated by the Science Based Targets initiative (SBTi) in 2019 as 1.5°C-compliant, according to the version of the SBTi Corporate Net-Zero Standard valid at the time. They committed to reducing absolute Scope 1* and Scope 2** emissions in the production plants by 50% compared to 2018, by 2030. This target was already achieved in 2022. Therefore, the Mercedes-Benz Group has a new target for 2030: to reduce CO₂ emissions in its production plants (Scope 1 and Scope 2) by 80% compared to 2018.



Source: Annual Report 2025 | Mercedes-Benz Group (<https://group.mercedes-benz.com/documents/investors/reports/annual-report/mercedes-benz/mercedes-benz-annual-report-2025-incl-combined-management-report-mbg-ag.pdf>)

*Scope 1: direct emissions from sources that report directly to or are controlled by the Group.

**Scope 2: indirect emissions from purchased energy, such as electricity or district heating, which is generated externally but consumed by the Group.

Decarbonization

For the Mercedes-Benz Group, “Ambition 2039” is a pivotal strategic component. By 2039, the entire Mercedes-Benz new vehicle fleet is to become net carbon-neutral* across all stages of the value chain and its entire life cycle. The Mercedes-Benz Group sees the electrification of its vehicles as a very important lever. The pace of the transformation is determined by market conditions, infrastructure and consumer behaviour.

CO₂ compensation and removals

The Mercedes-Benz Group aims to reduce greenhouse gas emissions in its own business activities and throughout the entire value chain. The greenhouse gas emissions that cannot be avoided even after significant reduction at the locations** operated by the Mercedes-Benz Group (Scope 1*** and Scope 2****) have been offset by qualified climate change mitigation projects since 2022.

Respect for human rights

Respect for human rights is of central importance to the Mercedes-Benz Group. As such, it constitutes one of the six strategic sustainability focus areas. The Group is committed to respecting human and employee rights

in all Group companies and among partners throughout the value chain. The Group makes this clear in its Principles of Social Responsibility and Human Rights.

These principles serve as a basis for implementing human rights due diligence obligations. They set out the human rights risks relevant to the Mercedes-Benz Group. Furthermore, the Group is committed to the following international conventions and guiding principles, including:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- Declaration of the International Labour Organization (ILO) on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights
- Ten Principles of the UN Global Compact (UNGC)
- Guidelines for Multinational Companies of the Organisation for Economic Co-operation and Development (OECD)

The Principles of Social Responsibility and Human Rights, which were updated in this reporting year, include, among others, the following topics:

- Appropriate remuneration
- Compliance with legal or industry-specific requirements for working hours
- The prohibition of human trafficking, child labour and forced labour
- The right to freedom of association and collective bargaining
- Health and safety at work – the right to equal opportunities and protection from discrimination

Source: Annual Report 2025 | Mercedes-Benz Group
(<https://group.mercedes-benz.com/documents/investors/reports/annual-report/mercedes-benz/mercedes-benz-annual-report-2025-incl-combined-management-report-mbg-ag.pdf>)

* Net carbon-neutral means that carbon emissions that have neither been avoided nor reduced at the Mercedes-Benz Group are compensated for by certified offsetting projects.
 ** All considered locations in the respective reporting year of the Sustainability Statement.
 *** Scope 1: direct emissions from sources that report directly to or are controlled by the Group.
 **** Scope 2: indirect emissions from purchased energy, such as electricity or district heating, which is generated externally but consumed by the Group.

Appendices

- 39 GRI Standards Reference table
- 47 Connection between Athlon's key ESG Drivers and ESRS
- 50 Connection between ESG key drivers and SDG's
- 53 Declaration of Sustainability
- 54 Code of Conduct

Appendix 1:

GRI Standards Reference table

Statement of use

Athlon has reported the information cited in this GRI content index for the period 1 January 2025-31 December 2025 with reference to the GRI Standards.

GRI 1 used

GRI 1: Foundation 2021

GRI 2: GENERAL DISCLOSURES 2021

GRI Description	Disclosure	Page
The organisation and its reporting practices		
2-1 Organizational details	Athlon Car Lease International B.V. - Stationsplein Noord-Oost 414, 1117 CL Schiphol Visiting address: Veluwezoom 4, Postbus 60250, 1320 AH Almere In 2025 Athlon was active in 20 European countries, with own agencies in Belgium, France, Germany, Italy, Luxembourg, Netherlands, Poland, Portugal, Spain, and United Kingdom, and local partners in Austria, Czech Republic, Denmark, Hungary, Norway, Republic of Ireland, Romania, Slovakia, Sweden and Turkey Our Company > Shaping sustainable mobility	5
2-2 Entities included in the organization’s sustainability reporting	The sustainability reporting includes Athon Car Lease International B.V. encompassing all its own locations (Athlon Belgium, Athlon France, Athlon Germany, Athlon Italy, Athlon Luxembourg, Athlon Netherlands, Athlon Poland, Athlon Portugal, Athlon Spain, and Athlon United Kingdom). The consolidated financial statements include the same entities.	
2-3 Reporting period, frequency and contact point	Reporting period: 1 January 2025 - 31 December 2025 - the sustainability reporting period is aligned with the financial reporting period Frequency: Annually Publication date: 22 April 2026 Contact point: Klaas Pool, ESG Director, klaas.pool@athlon.com	
2-4 Restatements of information	Information from prior reports has been restated. Definitions in ESG scorecard were brought more in line with previous years.	
2-5 External assurance	Not applicable (report inspired by GRI)	

Activities and workers

2-6 Activities, value chain and other business relationships	Our Company > Shaping sustainable mobility Our Company > What makes us different?	5
2-7 Employees	Information incomplete Our Company > What makes us different?	5
2-8 Workers who are not employees	Information incomplete	

Governance

2-9 Governance structure and composition	ESG: Driving Sustainable Success	7
2-10 Nomination and selection of the highest governance body	Information incomplete	
2-11 Chair of the highest governance body	Information incomplete	
2-12 Role of the highest governance body in overseeing the management of impacts	Information incomplete	
2-13 Delegation of responsibility for managing impacts	ESG: Driving Sustainable Success	7
2-14 Role of the highest governance body in sustainability reporting	ESG: Driving Sustainable Success	7
2-15 Conflicts of interest	Appendix 3 > Athlon International Code of Conduct (updated version March 2026)	40
2-16 Communication of critical concerns	Our policies	23–24
2-17 Collective knowledge of the highest governance body	Our Company ESG: Driving Sustainable Success	5 7

2-18 Evaluation of the performance of the highest governance body	Information incomplete	
2-19 Remuneration policies	Information incomplete	
2-20 Process to determine remuneration	Information incomplete	
2-21 Annual total compensation ratio	Information incomplete	
Strategy, policies and practices		
2-22 Statement on sustainable development strategy	CEO interview ESG: Driving Sustainable Success	2 7
2-23 Policy commitments	Our policies Appendix 3 > Athlon International Code of Conduct (updated version March 2026) Appendix 4 > Declaration on the Principles of Sustainability (updated version March 2026)	23-24 39 40
2-24 Embedding policy commitments	Our policies	23-24
2-25 Processes to remediate negative impacts	Our policies	23-24
2-26 Mechanisms for seeking advice and raising concerns	Our policies Appendix 3 > Athlon International Code of Conduct (updated version June 2025)	23-24 40
2-27 Compliance with laws and regulations	Compliant	
2-28 Membership associations	ESG: Driving Sustainable Success	7

Stakeholder engagement

Annexe 3 > Athlon International Code of Conduct (updated version June 2025)		40
Annexe 3 > Athlon International Code of Conduct (updated version June 2025)		
2-29 Approach to stakeholder engagement	ESG: Driving Sustainable Success	7
2-30 Collective bargaining agreements	Information on the collective bargaining agreements is not centrally available.	

GRI 3: Material topics 2021

Disclosure	Comments	Page
3-1 Process to determine material topics	ESG: Driving Sustainable Success Appendix 2 > Connection between Athlon's Key ESG Drivers and ESRS	7 36-38
3-2 List of material topics	ESG: Driving Sustainable Success Appendix 2 > Connection between Athlon's Key ESG Drivers and ESRS	7 36-38

Environmental

Climate action		
3-3 Management of material topics	Our Key ESG Drivers > Protect Our Planet > Climate Action and air pollution	10-14
GRI 305: Emissions 2016		
305-1 Direct (Scope 1) GHG emissions	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Aollution Sustainability Impact Scorecard 2025	10-14 4

305-2 Energy indirect (Scope 2) GHG emissions	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Pollution Sustainability Impact Scorecard 2025	10-14 4
305-3 Other indirect (Scope 3) GHG emissions	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Pollution Sustainability Impact Scorecard 2025	10-14 4
Own indicator: Net carbon-neutral offices and locations	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Pollution Sustainability Impact Scorecard 2025	10-14 4
Own indicator: Entirely or partly electric vehicles (xEV) in customer fleet	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Pollution Sustainability Impact Scorecard 2025	10-14 4
Own indicator: Battery electric vehicles (BEV) in customer fleet	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Pollution Sustainability Impact Scorecard 2025	10-14 4
Own indicator: Entirely or partly electric vehicles (xEV) in employee fleet	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Pollution Sustainability Impact Scorecard 2025	10-14 4
Own indicator: Battery electric vehicles (BEV) in employee fleet	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Pollution Sustainability Impact Scorecard 2025	10-14 4
Own indicator: Average CO ₂ tailpipe emissions per vehicle in customer fleet	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Pollution Sustainability Impact Scorecard 2025	10-14 4
Own indicator: Average CO ₂ tailpipe emissions per vehicle in employee fleet	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Pollution Sustainability Impact Scorecard 2025	10-14 4
Own indicator: Scope 1 emissions (metric ton CO ₂ equivalent)	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Pollution Sustainability Impact Scorecard 2025	10-14 4
Own indicator: Scope 2 emissions (metric ton CO ₂ equivalent)	Our Key ESG Drivers > Protect Our Planet > Climate Action and Air Pollution Sustainability Impact Scorecard 2025	10-14 4

Circular economy

3-3 Management of material topics	Our Key ESG Drivers > Protect Our Planet > Circular Economy	15
-----------------------------------	---	-----------

Water Use and Air Pollution

3-3 Management of material topics	Our Key ESG Drivers > Protect Our Planet > Reduce Water Use	16
-----------------------------------	---	-----------

Social

Responsible inclusive employer

3-3 Management of material topics	Our Key ESG Drivers > Empower our Community > Responsible Inclusive Employer	17
-----------------------------------	--	-----------

GRI 403: Occupational health and safety 2018

403-1 Occupational health and safety management system		
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	Our Key ESG Drivers > Empower our Community 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, internationally group regulations for each individual market.	17-21
403-5 Worker training on occupational health and safety		
403-6 Promotion of worker health		
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		

GRI 405: Diversity and equal opportunities 2016

405-1 Diversity of governance bodies and employees	Sustainability Impact Scorecard 2025	4
Own indicator: Number of nationalities	Sustainability Impact Scorecard 2025	4
Own indicator: Number of internships	Sustainability Impact Scorecard 2025	4

Road Safety

3-3 Management of material topics	Our Key ESG Drivers > Empower our Community > Road Safety	20
Own indicator: Accidents caused by an Athlon vehicle	Sustainability Impact Scorecard 2025	4

Community Engagement

3-3 Management of material topics	Our Key ESG Drivers > Empower our Community > Community Engagement	21
-----------------------------------	--	-----------

GRI 413: Local communities 2016

413-1 Operations with local community engagement, impact assessments, and development programs	Our Key ESG Drivers > Empower our Community	21
Own indicator: Hours of voluntary work by Athlon employees	Sustainability Impact Scorecard 2025	4
Own indicator: Staff participation in voluntary program	Sustainability Impact Scorecard 2025	4

Governance

Business ethics

3-3 Management of material topics	Our Key ESG Drivers > Steer our Impact	22
-----------------------------------	--	-----------

Customer and supplier engagement

3-3 Management of material topics	Our Key ESG Drivers > Steer our Impact	22
-----------------------------------	--	-----------

ESG governance

3-3 Management of material topics	Our Key ESG Drivers > Steer our Impact	22
Own indicator: Sustainability Culture index	Sustainability Impact Scorecard 2025	4
Own indicator: Participation in integrity and sustainability trainings	Sustainability Impact Scorecard 2025	4

Appendix 2:

Connection between Athlon's key ESG Drivers and ESRS

Protect our Planet

Athlon's impact domain	Athlon's ESG topic	ESRS topics & sub-topics
Climate action and air pollution	E1 Fleet electrification Own GHG emissions GHG emissions value chain Transition towards green energy Green Deal & EU climate transition	Climate change → Climate change mitigation → Energy use & energy mix
	E2 Air pollution Chemical pollution	Pollution → Pollution of air, water and soil
Circular economy	E5 Circular economy	Circular economy
Reduce water use	E3 Water use	Water and marine resources → Water consumption



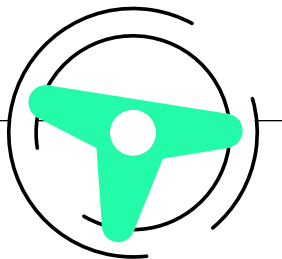
Empower our community

Athlon's focus area	Athlon's material topic	ESRS topics & sub-topics
Responsible inclusive employer S1	Responsible employer Education, training and talent management Business ethics regarding diversity, equity and inclusion Future of work	Own workforce → Working conditions → Equal treatment and opportunities for all → Other work-related rights
Road Safety S1 S4	Road Safety	Customers and end-users → Health and safety → Access to products and services
Community Engagement S4 S1 S3 S4	Providing access to sustainable mobility Community Engagement	Affected communities → Adequate housing, food, sanitation, sharing knowledge



Steer our Impact

Athlon's focus area	Athlon's material topic	ESRS topics & sub-topics
<p>ESG governance</p>	<p>ESRS 2 — Transparency and reporting — ESG-risk management</p> <p>G1 — Corporate reputation</p> <p>Entity-specific topic ← — Sustainable finance</p>	<p>General disclosure ESRS 2</p> <p>Business conduct</p> <p>→ Corporate culture</p>
<p>Business ethics</p>	<p>G1 — Business ethics regarding anti-bribery, anti-corruption, compliance</p>	<p>→ Corruption and bribery</p>
<p>Customer and supplier engagement</p>	<p>G1 — Supply chain management</p> <p>S4 — Customer relationships — Privacy and data protection</p>	<p>→ Supply chain management</p> <p>Customers and end-users</p> <p>→ Privacy</p>



Appendix 3:

Connection between ESG key drivers and SDG's

Athlon's impact domain	ESRS	Athlon's double materiality topics	SDG
Protect our planet			
Climate action and air pollution	E1 E2		
	E1	Fleet electrification	SDG 7, SDG 9, SDG 11, SDG 13
		Own GHG emissions (Scope 1 & 2)	SDG 7, SDG 13
		GHG emissions value chain (Scope 3)	SDG 9, SDG 12, SDG 13
		Transition towards green energy	SDG 7, SDG 13
		Green Deal & EU climate transition	SDG 7, SDG 9, SDG 12, SDG 13, SDG 17
	E2	Air pollution	SDG 3, SDG 11, SDG 13
		Chemical pollution	SDG 3, SDG 12
Circular economy	E5		
		Circular economy	SDG 9, SDG 12
Reduce water use	E3		
		Water use	SDG 6, SDG 12

Source: <https://sdgtoolkit.org/what-is-it/indicators-and-goals/>

Athlon's impact domain	ESRS	Athlon's double materiality topics	SDG
Empower our community			
Responsible inclusive employer	S1 S3 S4 S1	Responsible employer Education, training & talent management Business ethics regarding DEI	SDG 8 SDG 4 SDG 5, SDG 10
Road Safety	S1 S4	Road Safety	SDG 3, SDG 11
Community Engagement	S1 S3 S4	Community Engagement	SDG 1, SDG 11, SDG 17

Source: <https://sdgtoolkit.org/what-is-it/indicators-and-goals/>

Athlon's impact domain	ESRS	Athlon's double materiality topics	SDG
Steer our Impact			
Business Ethics	G1	Business ethics regarding anti-bribery, anti-corruption, compliance	SDG 16
Customer and supplier engagement	G1	Supply chain management	SDG 12, SDG 17
	S4	Customer relations	SDG 7, SDG 16
		Privacy and data protection	
ESG Governance	G1 ESRS2	Transparency and reporting	SDG 12, SDG 16
	ESRS2	ESG-risk management	SDG 16
	G1	Corporate reputation	SDG 16
		Sustainable finance	SDG 16

Source: <https://sdgtoolkit.org/what-is-it/indicators-and-goals/>

Appendix 4:

Declaration of Sustainability (updated version April 2026)



Declaration on the Principles of Sustainability

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

Our Sustainability Mission Statement

“We shape sustainable mobility. Our team guides, supports and delivers the fleet and mobility solutions that are the best for our customers, society and our company. We are getting you there.”

Environment Sustainability

We promise to promote sustainable mobility by leasing eco-friendly vehicles and reducing our own carbon footprint. This contributes to a greener and more responsible future for everyone. We are committed to leasing products designed for longevity, reusability, and resource efficiency. We aim to foster a circular and sustainable economic model for our customers and the environment. We prioritize low-emission vehicles in our leasing options, charge with green energy and advocate for water-efficient car washing. This ensures a cleaner and healthier planet for generations to come. 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, suppliers and partners.

Social Sustainability

We are committed to diversity, inclusion, equal opportunities, and social dialogue to set a standard for corporate responsibility and create a workplace culture that values and respects every individual. By focusing on employee wellbeing, professional development and working conditions (including health & safety), we aim to safeguard a safe working place. We prioritize road safety by offering tools and solutions to increase driver safety for both our employees and our customers. Our goal is to contribute to a secure road environment, ensuring the wellbeing of our employees and promoting safety-conscious habits among our customers. We actively work with local communities, using our expertise in mobility to support and collaborate on local initiatives, address community needs, and exchange information. We aim to contribute positively to the well-being and sustainable development of the areas we serve.

Governance Sustainability

We operate with integrity, transparency, and accountability. By promoting ethical conduct and fair business practices, we aim to build trust with our stakeholders and uphold high ethical standards in the leasing industry. We actively engage with our customers and suppliers to understand their needs and build long-lasting partnerships. Through open communication, we ensure mutual success, collaboration, and shared growth. We are committed to strong ESG governance practices, which means being transparent, accountable, sound information security, and making responsible decisions in everything we do. Our goal is to create sustainable value for our stakeholders and contribute to a resilient and responsible business community.

We are committed to the Principles of Sustainability.

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

- **Accountability:** Be accountable for our impact on the environment, society and the economy.
- **Transparency:** Be transparent in our decisions and activities that have impact on society and environment.
- **Ethical behavior:** Always engage in ethically correct behavior.
- **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 labor & human rights:** Respect labor & human rights and recognize both their importance and their universality.

Our Sustainability Commitment

We commit to tackle our material Sustainability impact topics and will establish clear objectives and targets. Additionally, we develop and maintain Social Sustainability programs and management systems and dedicate sufficient resources to respond to these principles.

We also subscribe to the principles of the Athlon Sustainability Strategy. Therefore, we commit to the following ESG Key Drivers:

- **Protect our Planet (E)** | We act against climate change and air pollution, support the circular economy and reduce water use.
- **Empower our Community (S)** | We aim to be a responsible inclusive employer that acts on road safety and gives back to the community.
- **Steer our Impact (G)** | We take accountability, apply strong business ethics, encourage our stakeholders and provide transparency.

Quality and Customer Focus

We realize this through:

- Asking our customers frequently what their needs are.
- Exceeding the expectations of our customers with high quality products and services.
- 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

We aim to meet the demands of our customers, suppliers, government and Mercedes-Benz Group AG. Being compliant is always our priority number one. This will be monitored through a sound system of control, audits and reporting. We expect our employees to have an active role in meeting these standards and demands. We also ask them to implement improvements to meet future demands.

At Athlon we work together to reach our goals. We are highly motivated and passionate to reach our goals while developing the organization to become better every day. We also 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 (SDGs) of the UN Paris Climate Agreement

We linked our Sustainability Strategy to the SDGs: a common global language which helps us, along with our stakeholders, to contribute to a better and more sustainable world. This also allows us to gain insight in how we can have an even bigger positive impact on both environment and society. The SDGs can be seen as an inseparable whole. All SDGs are equally important, but we focus on the SDGs where Athlon can have impact due to its business model:

- SDG 1: No Poverty
- SDG 3: Good Health and Well-being
- SDG 4: Quality Education
- SDG 5: Gender Equality
- SDG 7: Affordable and clean energy
- SDG 8: Decent Work and Economic Growth
- SDG 10: Reduced inequalities
- SDG 11: Sustainable Cities and Communities
- SDG 12: Responsible Consumption and Production
- SDG 13: Climate Action
- SDG 16: Peace, Justice and Strong Institutions
- SDG 17: Partnership for the Goals



Athlon Car Lease International B.V.
Schiphol, April 2026

Signed by: Christian Schüller
E-Mail: christian.schueler@mercedes-benz.com
Signing time: 15-04-2026 13:48:22 (+02:00)
IP address: 163.116.181.160

Athlon Car Lease International B.V.
Schiphol, April 2026

Signed by: Klaas Pool
E-Mail: klaas.pool@athlon.com
Signing time: 15-04-2026 12:11:55 (+02:00)
IP address: 163.116.181.32

Appendix 5:

Code of Conduct

(updated version April 2026)



Code of Conduct

Company Profile

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

Why and for Whom?

This code is intended to increase awareness among management and employees regarding fair business practices. This is done by documenting what is considered appropriate and inappropriate behavior. This code applies to every employee, director, or officer in our company. Contract staff working for our company must also comply with the Code of Conduct. 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 of Conduct when acting on our behalf. This document is reviewed every year.

Compliance with Law

All employees must protect our company's compliance with laws and regulations. They must comply with all applicable environmental, safety and fair dealing with laws and regulations. We expect our employees to act in an ethical and responsible manner. We pursue an integrated compliance approach to preventing and combating money laundering.

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. We also do not tolerate corrupt behavior.

Gifts and Hospitality

We may not encourage, ask for or demand gifts and hospitality from business partners, or offer to them, especially those you would not be comfortable telling your manager, colleagues, family, or the public that you had offered or accepted. We avoid allowing 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.

Conflict of Interest

Conflict 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's business decisions. A 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 Code of Conduct is based on the Mercedes-Benz Integrity Code and Mercedes-Benz Responsible Sourcing Standards, which are also applicable for Athlon Group.

Athlon Car Lease International B.V.
Schiphol, April 2026

Athlon Car Lease International B.V.
Schiphol, April 2026

Signed by: Christian Schöler
E-Mail: christian.schueler@mercedes-benz.com
Signing time: 15-04-2026 13:48:30 (+02:00)
IP address: 163.116.181.160

Signed by: Klaas Pool
E-Mail: klaas.pool@athlon.com
Signing time: 15-04-2026 12:12:02 (+02:00)
IP address: 163.116.181.32

Christian Schöler | CEO

Klaas Pool | Director ESG

Athlon Car Lease International B.V.

Stationsplein Noord-Oost 414
1117 CL Schiphol
Netherlands
www.athlon.com

Follow us on LinkedIn

Klaas Pool

ESG Director
E klaas.pool@athlon.com

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

[Click here](#)



Contact