



The WayWeWork

Our guide to ethical and
responsible conduct

D'leteren



We all make a lot of decisions every day. Some are relatively simple while others are much more difficult.

The WayWeWork aims to help you when it comes to making delicate and/or tricky decisions by defining the principles that will allow you to act with integrity in your interactions with customers, partners and colleagues.

How to use ▶ The WayWeWork

The WayWeWork serves as an ethical guide in all situations related to the business activities pursued by D'leteren*, i.e. D'leteren Automotive, Lab-Box, Wondergroup, Sopadis, D'leteren Centres, PC Antwerp, PC Brussels and Volkswagen D'leteren Finance.

In other words, The WayWeWork applies to every staff member at all D'leteren businesses. We also expect third parties acting on behalf of our businesses to follow the principles set out in this guide. Each and every employee or third party must familiarise themselves with the content of this guide and act in accordance with it.

It is also up to managers to promote it and demonstrate by example how its principles are to be applied, both internally and externally.

The WayWeWork provides general guidelines and is not an exhaustive document anticipating all possible situations employees might face in their day-to-day work. It does not preclude the need for common sense or professional judgement.

On the other hand, it does highlight the guiding principles to be respected and reflected in all decisions and actions taken. These principles also form the basis for company policies and procedures.

Breaches of this guide may constitute professional misconduct and be penalised in accordance with labour regulations and applicable legislation.

**The name D'leteren used in this document encompasses all the companies mentioned in this paragraph.*

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Message from Denis Gorteman

CEO of D'leteren

Our ambition is to be the first-choice supplier in Belgium for smooth and sustainable mobility for all. At the heart of this ambition is our commitment to apply the highest ethical standards and comply with all applicable laws as well as our own in-house rules and procedures.

This approach is not only the right attitude to adopt, it also gives us the means to achieve successful and sustainable business and growth. It is firmly rooted in our core values.

The WayWeWork is a guide that each and every one of us should rely on throughout their journey at D'leteren. As CEO, I personally attach a great deal of importance to the quality of working relationships and I am therefore proud to share with you this update to our code of conduct, in line with the changes and developments within our organisation and the environment in which we operate. I invite you all to take ownership of the content and implement it each and every day.

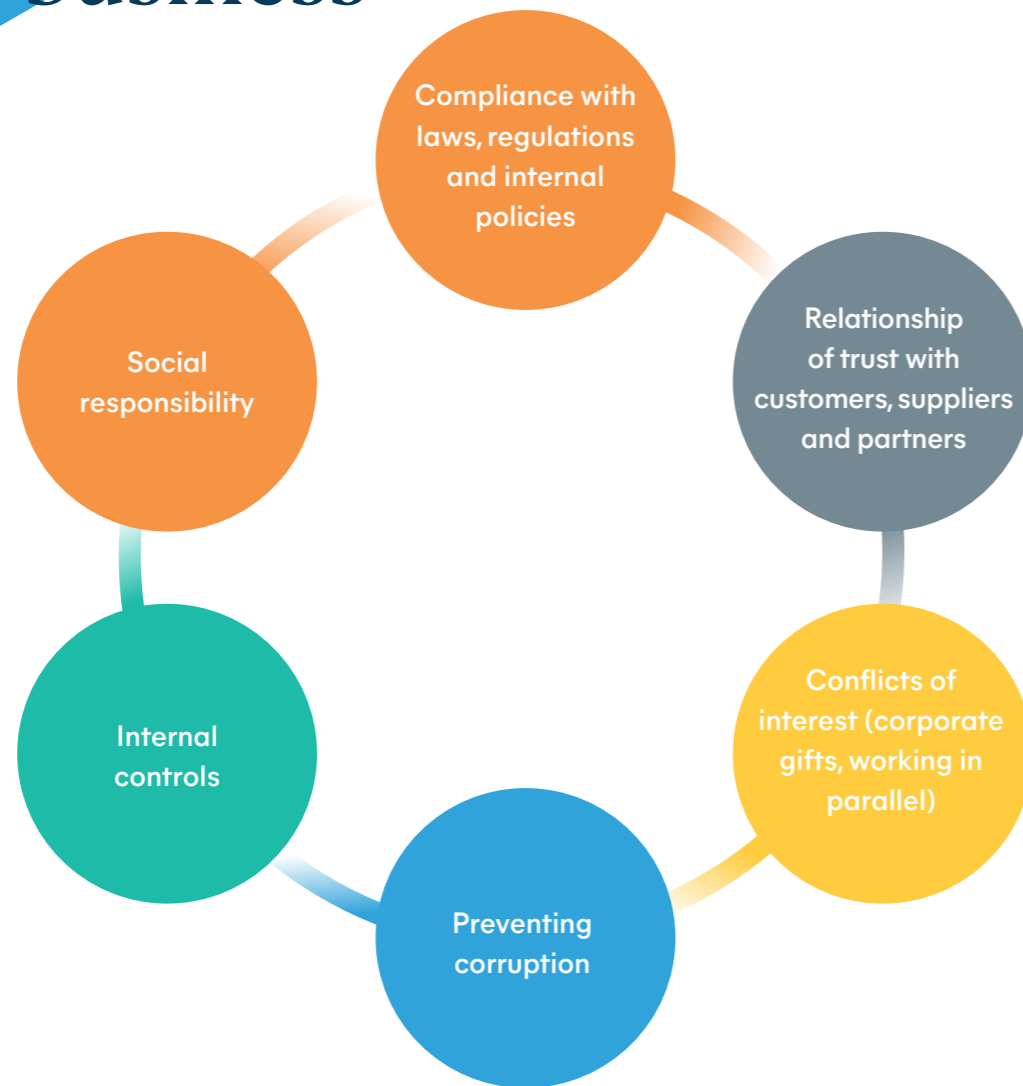
However, our pro-ethics approach is only credible if we are also committed to opening our eyes to potential breaches and shortcomings so that we can remedy them as well as protect our company and anyone who might be victimised. If you become aware of a situation that suggests a breach might have occurred, we encourage you to report it to your manager, to the management of your department or to the individuals in the positions mentioned in this guide. Our Integrity Alert System is also at your disposal if you wish to contact an external party mandated to process such alerts, in full confidentiality.

It is essential to maintain an open and transparent environment in which issues can be addressed without fear of reprisal in order to preserve our reputation and our ability to operate effectively. Our values and ethical rules are one of our most valuable resources. They allow us to earn and maintain the trust of the people we serve. They are a source of commitment and unity. They are the foundation of our identity and our success.

Questions that can help you make a decision

- ▶ *Will this decision put D'leteren in an illegal or unethical situation?*
- ▶ *How would my colleagues, family or friends perceive my decision?*
- ▶ *Could this course of action damage D'leteren's reputation?*
- ▶ *Did I ask the right people for advice?*
- ▶ *Does the situation create a real or apparent conflict of interest?*
- ▶ *Would I be comfortable if someone treated me the same way?*

How we conduct our business



1.

Compliance with laws and regulations. Compliance with internal rules and policies

D'leteren maintains its reputation by complying with all laws, regulations and regulatory constraints in force wherever it does business. It is the personal responsibility of each staff member to be aware of the laws, regulations and regulatory constraints that concern or have an impact on their duties or job. If questions arise, the legal department is available to answer them.

Moreover, D'leteren wants to stand out from the competition thanks to its services, the prices it charges and the loyalty shown by its customers. We believe in open competition. We want to succeed ethically and with the highest integrity. Consequently, D'leteren does not enter into commercial agreements that distort, eliminate or provide competitive advantages.

In addition to the laws and regulations applicable to our businesses, D'leteren implements internal rules, instructions, guidelines and policies that govern the

day-to-day work of its employees. Each and every one of us must comply with all of these rules.

2.

A relationship of trust with customers, suppliers and partners

D'leteren is committed to providing its customers with high-quality products and services that meet their needs. We are doing everything we can in terms of efficiency, growth, innovation and sustainable development to occupy a leading position in our markets. Anyone involved in negotiating contracts with customers must ensure that statements, communications and presentations made to customers are honest and accurate. All personnel have a responsibility to protect sensitive and confidential customer information, and this data should only be shared with those who have a legitimate need for it.

suppliers and partners to comply with all laws and regulations governing their activities. They are also encouraged to comply with our code of conduct in carrying out their activities.

Our customers, suppliers and partners may, if they deem it necessary, use the D'leteren Integrity Alert System available on our site at dieteren.be.

D'leteren respects its suppliers and business partners and honours its commitments. Suppliers are selected independently, based on a professional assessment, and in line with current legislation and internal purchasing procedures. We expect our



3. Conflicts of interest

Any employee may find himself or herself in situations in which his/her personal interest – or that of the natural or legal persons to which he/she is linked or to which he is close – may not converge with the interests of D’leteren. In order to protect D’leteren and protect themselves from any appearance of conflict of interest, personnel are encouraged to inform their superiors (in writing to their manager) of any relationship they may have with a customer, supplier or competitor, whether the latter are already in contact with D’leteren or whether they are potential partners.

More generally, we must all avoid any involvement in transactions or activities that may be considered as constituting or giving rise to a conflict of interest and, where applicable, entrust the case or decision-making to one or more people from D’leteren who have no conflicts of interest.

Personnel are not permitted to use company property, information or their position within D’leteren for their personal gain or that of others. In addition, personnel are not permitted to derive personal benefits from business or investment opportunities generated by D’leteren, apart from any long-term incentive plans put in place for management.



Do not: involve a supplier in a competition based on a 'good relationship'; accept a gift from a supplier and give the supplier preference; influence a colleague to obtain preferential conditions for the purchase of a vehicle for a connection; negotiate a contract that will make a close friend's business one of D’leteren's suppliers; use a company supplier for private reasons; etc. These are examples of conflicts of interest that may lead to a loss of objectivity, a perception of dependence or have an unfavourable impact on the performance of your work at D’leteren.



3.1 Gifts and entertainment

Gifts and invitations to certain events that we receive from our customers, suppliers, dealers or any other partner, or that we ourselves give, must be kept within acceptable limits, both with regard to reasonable and tolerated business practices and to anti-corruption legislation.

Customary end-of-year gifts or favours of low value – i.e. less than €50 excluding VAT – received within the framework of reasonable commercial practices, as well as occasional modest meals are in principle acceptable, provided they in no way influence our

independence or the defence of D’leteren's interests. Under no circumstances is the exchange of cash and cash equivalents (securities or gift vouchers, for example) acceptable.

If you accept a gift or favour, you must report it to your manager and inform him/her of its value. A gift should never be accepted if it influences your judgement or breaks the law.

3.2 Parallel work and other activities

In addition to their duties at D’leteren, staff members are free to participate in lawful activities provided that they do not interfere with the quality of their services within the company and do not involve the disclosure of confidential information. Moreover, the activity must not adversely affect the quality of the employee's services at his/her workplace, may only be carried out outside

of his/her working hours and may not involve the use of equipment, supplies or equipment or information belonging to D’leteren, except with the express written consent of management.

Moreover, it cannot constitute a form of unfair competition, direct or indirect.

4. Preventing corruption

D'leteren bases its relations on trust and on a mutual understanding that any form of corruption is unacceptable in our business activities. No one at D'leteren may offer, pay, demand, facilitate or accept bribes, unlawful commissions or any other form of retribution, or use any third party – subcontractors,

advisers or agents – to carry out such actions. We do not engage in money laundering and do not condone, facilitate, or support the trade in illicit goods or services or tax evasion.

5. Internal controls

D'leteren is committed to providing sincere and accurate information on all matters relating to accounting and financial reporting. Any irregularity can have serious consequences for the company as well as for those responsible. In addition, at all levels of D'leteren, staff members make decisions based on information prepared by others. It is therefore vital to have reliable information to ensure the development of our business activities.

That is why we at D'leteren make sure that we keep accounts and reports that accurately reflect all of our operations and transactions. In this context, it goes without saying that we expect our employees to transmit reliable, complete, precise and documented information. Just as it goes without saying that those of us who exercise a function that involves supervising such information ensure appropriate follow-up and the control.

In addition, the prevention and detection of fraud is fundamental to D'leteren's commitment to maintain ethical and legal behaviour. Fraud is defined as any act aimed at deceiving, stealing or lying in order to gain an unlawful advantage. Fraud includes, for example, submitting forged expense reports, misappropriating or misusing company assets, managing or executing unauthorised cash transactions or payments, etc. All staff members must therefore ensure that the documents, reports or information they produce are accurate, honest, fair and adequate.

If you notice the existence of erroneous reports or discover transactions or questionable accounting practices involving D'leteren, you must inform your manager or one of the persons occupying the functions listed on page 27 of this guide as soon as possible, or even use the Integrity Alert System available via the D'leteren Intranet, the websites of the subsidiaries concerned or via their internal processes.

Social responsibility

Mobility is not only our business, but also a social issue. That means we are particularly well placed to deploy our expertise and know-how to benefit our customers, partners, employees and society in general. We aim to be the benchmark and a source of inspiration when it comes to sustainable mobility.

Being responsible also means promoting sustainable growth for all and minimising our environmental impact.

Accordingly, our commitment to reduce our CO₂ emissions via our stringent action plan is very ambitious, even exceeding the Paris Agreement objective of limiting the temperature rise to 1.5 °C.

Meanwhile, D'leteren is offsetting emissions that cannot currently be reduced and has been carbon-neutral since 2021.

D'leteren is also firmly committed to promoting equal opportunities and inclusion. Diversity is a factor in innovation, performance and quality of life within the company, which serves more than 1.2 million customers.





Respect and inclusion

Our employees are our most valuable asset. At D'Ieteren, we are committed to providing inclusive, healthy and safe work environments, in which all staff, partners and customers are respected and valued.

1. Equal opportunities, inclusion and non-discrimination

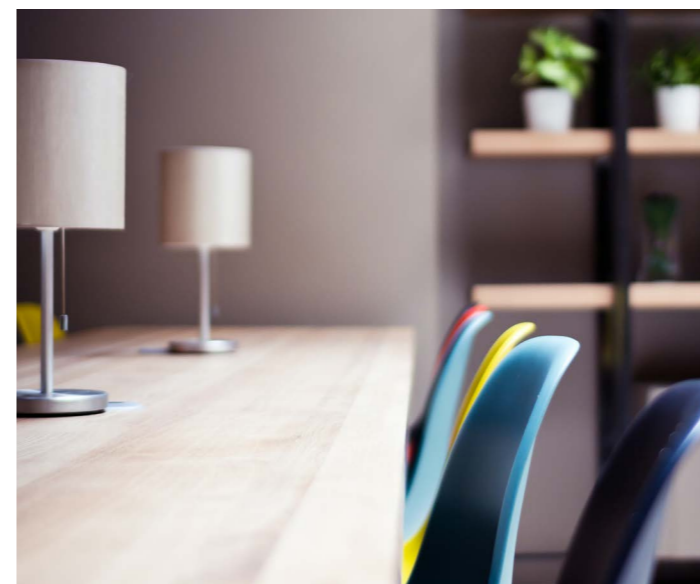
D'Ieteren guarantees its employees equal opportunities, inclusion and non-discrimination. D'Ieteren recognises and values differences by building teams that reflect the communities and the market in which it operates. All decisions relating to employment, including hiring, performance appraisal, promotion, training, remuneration and development, are made solely on the basis of objective factors such as skills, qualifications, merit, performance and other professional considerations.

D'Ieteren prohibits any form of discrimination based on age, gender, ethnic origin, nationality, religion, health, disability, marital status, sexual preferences, political or philosophical beliefs, union membership or related to other characteristics protected by the laws and regulations in force.

2. Behaviour in the workplace

D'Ieteren is committed to promoting a work environment in which its employees respect each other. Any form of harassment, intimidation, oppression, exploitation, violence in the broad sense of the term, discrimination, racism, sexism or homophobia cannot be tolerated under any circumstances. Employees must be able to work and grow in a safe and stimulating atmosphere.

We also firmly believe that an open work environment implies that each employee adopts, in the performance of their work, a religiously and philosophically neutral attitude towards colleagues, customers and suppliers. Wearing conspicuous external signs of belonging to a political party, religion or philosophy is therefore prohibited while working.



If you have witnessed or have been the victim of discrimination, inappropriate behaviour or harassment, immediately inform your manager or one of the individuals in the positions listed on page 27 of this guide. Keep in mind that ignoring the problem will not solve it. Prompt reporting of inappropriate conduct makes it possible to respond quickly and maintain a healthy environment.

3. Health and safety

The implementation of rigorous safety standards and their constant improvement is an integral part of our work ethics and our commitment. D'leteren provides working conditions on its sites which ensure the health and safety of its employees and contractors. Everyone is responsible for ensuring that the activities that depend on them are carried out in accordance with the relevant general regulations as well as the rules specific to D'leteren, and to report any problematic situations or dangerous

equipment. Moreover, D'leteren recognises the need for an appropriate work-life balance and implements, where appropriate, various initiatives on behalf of the well-being and health of its employees.



The safety of colleagues, customers and the public may depend on our ability to think clearly and react quickly. Being under the influence of alcohol or drugs or taking medication inappropriately can impair an employee's ability to perform their job safely and is therefore prohibited during working hours, on company premises or when operating a company vehicle.

No strong alcohol is provided at internal or external events organised by the company. Only wine, champagne or beer can be consumed at such events, and only in moderation.

Compliance with the highway code when travelling for business or testing vehicles, for example, is also a key element in our ethical commitment. We insist that you comply with it and do not endanger anyone, including yourself.

4. Protection of personal data

We guarantee the confidentiality and security of the personal data of our employees, customers and other people with whom we do business. Personal data may only be used for legitimate commercial purposes and in compliance with the applicable legislation.

staff members who have a legitimate reason to process this information on behalf of D'leteren, taking into account the nature and extent of their professional duties and responsibilities. It is the responsibility of each staff member to take steps to prevent personal data from being improperly managed, used or disclosed.

Accordingly, no personal data will be divulged to third parties unless doing so is necessary and authorised by law. In the course of performing your duties, you may have access to the personal data of other people. Access to such data is limited to

D'leteren's Data Protection Officer is at your disposal for any questions you may have on the subject. If you suspect that there is a data breach at D'leteren, report it as soon as possible.





Protection of D'Ieteren assets

We expect staff to use D'Ieteren assets responsibly. Assets not only include physical items, such as premises, goods, supplies, vehicles, equipment, furniture, telephone and computer networks, etc., but also intangibles, such as working time, the image of D'Ieteren and its brands, ideas, creations and concepts. All rights relating to goods and information generated or acquired in the course of the work of the staff member in the company remain the exclusive property of the company, unless otherwise provided by law.

1. Use of D'Ieteren IT resources

D'Ieteren's communication tools include computer equipment, computer networks, printers, e-mail, voice mail, Internet, landlines, smartphones and any other means of communication. Personal use of communication tools is permitted if such communication complies with existing regulations and if it does not interfere with work performance. Under no circumstances may such use be excessive, be for personal

gain or illegal purposes, or be abusive or offensive in any way whatsoever. In addition, all data and professional files taken or conveyed by these tools are the property of D'Ieteren.

2. Respect for confidential information

Protecting confidential information about our staff, customers, business partners and suppliers is a key commitment. We aim to protect such confidential information from unauthorised access or disclosure. In addition, the protection of information relating to prices, supplier contracts, sales and marketing strategies, intellectual property, litigation and risks enables us to protect our competitive position and is an essential factor in our success. All members

of our staff are required to maintain and protect the confidentiality of information relating to D'Ieteren even after termination of the employment contract.

At some point, we all become privy to confidential information in the performance of our duties. Such information can relate to a commercial strategy, economic data or even to the personal situation of our employees, customers, shareholders or dealers. Accordingly, we must take all necessary measures to prevent access to such information, for example, by securing our PC or our smartphone with effective

passwords, by not having professional conversations (telephone or other) in public places and by properly filing our confidential documents.



4. Communication

D'leteren, through its brands and its developments, deploys active communication with customers, journalists, opinion leaders, investors and the general public. Active communication is an essential element in preserving the company's image and reputation.

For these reasons, communication with the media is the sole responsibility of the communication department and general management. If you receive a request for an interview or information from a journalist, we ask that you notify the appropriate communication department and coordinate with them. If the request comes from

a financial analyst or investor, please forward it to the D'leteren Group financial communication department. For the sake of consistency and validity of the information, documents intended for wide publication, internally and/or outside D'leteren, must be approved by the appropriate communication department or be drawn up in collaboration with it. In the event of a crisis, relay the useful information in your possession directly to general management and/or the appropriate communication department and scrupulously apply the communication guidelines given.



3. Insider trading

In the course of their work-related activities, employees sometimes become privy to information which is not known to the public and which, if it were disclosed, would be likely to influence the D'leteren Group SA share price. The mere disclosure of such information, internally or externally, is an offence. The acquisition or sale of shares or other securities in the company (directly or via an intermediary) is prohibited for holders of such information until such time as it is made public. Only information

that is already public (available on www.dieteren.com) can be transmitted or commented on. Any other commercial or financial information may not be disclosed without prior authorisation. The communication of such information also follows strict rules and is reserved to a few formally authorised persons.

5. Use of social media

D'leteren respects the privacy and social relationships of its personnel. In addition, any public reference to the company or its employees on social media must be made in accordance with the terms of our code of conduct. We therefore recommend that you respect the following principles.

- ▶ *If you represent D'leteren products and services on social media, state that you work for D'leteren. Limit yourself to your areas of expertise. All of your statements must be correct and must not be misleading. If you leave D'leteren, do not forget to update your business information.*
- ▶ *Do not disclose confidential information under any circumstances. If you post the description of your responsibilities on LinkedIn, be careful not to reveal any information about products that are still confidential. Prohibited topics include disputes as well as financial and product information that has not yet been released. Also be sure to comply with the laws on trademarks, copyright and image rights.*
- ▶ *If you make a mistake, admit it. Be open and quickly correct your mistake. On the other hand, if you notice that normally confidential information is circulating on social media, immediately notify the appropriate communication service.*



Speaking out

If you have any questions or want to know how the guide applies to your day-to-day work, take the time to seek advice from your manager, your department management or whoever is in one of the positions set out in this guide.

If you have any question about the best behaviour to adopt in a specific situation, are aware of an ethics or compliance issue, or have a good faith belief that non-compliance issues exist at D'leteren, you can contact these same people or use our Integrity Alert System.

No matter how you choose to express yourself, the most important thing is that you speak up and point out issues so that you can identify them and properly resolve them as quickly as possible.

Confidentiality and respect will be applied to each of the situations presented. Under no circumstances will an employee who makes a report in good faith be subject to reprisals. Anyone, regardless of their hierarchical position, who attempts to retaliate will be subject to sanctions.



The individuals in the following positions are at your disposal if you so wish

- ▶ Your manager
- ▶ The management of your department
- ▶ The Human Resources officer of the company that employs you
- ▶ The Compliance Officer of D'leteren Automotive
- ▶ The Head of Internal Audit of D'leteren Automotive
- ▶ The Social Relations Manager of D'leteren Automotive
- ▶ The CEO of D'leteren
- ▶ The Chief Human Resources Officer of D'leteren Automotive
- ▶ The CEO of D'leteren Group
- ▶ The external health and safety service of your entity:
 - For D'leteren Automotive, D'leteren Centres and Volkswagen D'leteren Finance: Attentia - 02/ 738 75 31 - email : psy.prev@attentia.be
 - For other entities, contact information is available from your HR manager



The D'leteren Integrity Alert System

Deploying our values also means having the courage to detect shortcomings and securing our everyday work environment. This is the purpose of the D'leteren Integrity Alert System.

Anyone at D'leteren can send an alert. The same goes for our professional partners, customers and those around us. The D'leteren Integrity Alert System, available on dieteren.be and our intranets (or the websites of the subsidiaries concerned or via their internal processes), is managed by an independent operator and alert specialist that ensures maximum protection and confidentiality.

How to send an alert

- ▶ Send an alert to the special e-mail address: integrity@governlaw.com. The recipient is an independent firm: GOVERN & LAW.
- ▶ Describe the breach: what, where, when, how, who?
- ▶ Specify if you wish to remain anonymous.
- ▶ Be available and cooperate during the follow-up and/or investigation.

How are you protected?

- ▶ Absolute confidentiality (law firm)
- ▶ Specialist support and follow-up
- ▶ Whistleblowers are protected by law and by D'leteren.

The WayWeWork can be consulted on our intranets and on the websites of the subsidiaries concerned or via their internal processes. A printed copy can be obtained from the Communication & Sustainability Manager of D'leteren Automotive.

