

# D'leteren Automotive

## 1. Principles & Methodology

The commercial name of the D'leteren Automotive business, "D'leteren", will be used throughout this chapter.

D'leteren presents its FY-2023 sustainability report, which is gradually aligning with the European Sustainability Reporting Standards (ESRS), in preparation for full alignment in FY-2024. The scope of this report includes fully consolidated D'leteren entities (note 27 of the consolidated financial statements). The entities which are not fully consolidated by D'leteren, such as Volkswagen D'leteren Finance, are considered as part of the value chain. For the limited assurance conducted by KPMG, specific columns labelled as "DIA" have been incorporated in the report. In this context, the data provided pertains solely to D'leteren Automotive, excluding its subsidiary entities. For the carbon footprint, D'leteren is reporting both on its historical perimeter (D'leteren Automotive, D'leteren Centres, Porsche Centres Antwerp & Brussels) and its full scope.



The double materiality assessment conducted in FY-2023 was used to define the contents to be reported. The description of the strategic approach to the key non-financial topics and the main risks generated and incurred in these fields, including the existing methods for managing them, are discussed in the relative sections of this document. We address both the material environmental or social impacts of our activities, and the potential financial impacts for D'leteren of the risks and opportunities related to these issues. Our approach encompasses a broad spectrum of topics, such as reducing the carbon footprint of our activities, promoting sustainable and accessible mobility solutions or ensuring robust governance.

Not all the issues identified by the double materiality assessment share the same level of maturity in terms of commitments, policies and reporting as some of them were not identified by our previous materiality assessment. In 2024, D'leteren will develop the required action plans where necessary, while continuing to work on its strategic targets put in place for the 2020-2025 period.

The report covers the last two years, namely 2022 and 2023. The information and quantitative data collection process has been organised in such a way as to guarantee the comparability of the data and of the analysis of trends over this period, with the purpose of facilitating a correct interpretation of the information and a full overview for all stakeholders interested in the evolution of D'leteren's performance. Any changes in the collection methods from the previous year are suitably indicated in the document.

This sustainability report discloses when metrics involving upstream and/or downstream value chain data are estimated using indirect sources. This includes sector-average data or other proxies. Some quantitative metrics that are subject to a high degree of measurement uncertainty (where data collection is challenging or relies on estimates, assumptions, or indirect calculations) will be marked. When deemed necessary, context will be provided as well as explanations for the uncertainties involved.

The report focuses on current and completed initiatives, while ensuring compliance with the reporting standards and respecting the legal provisions of non-disclosure in specific circumstances.

This sustainability report contains statements relating to the future development of D’leteren’s business. These statements are based on assumptions relating to the development of the economic, political, and legal environment in Belgium, which we have made based on the information available to us and which we consider to be realistic as of the time of going to press.

## 2. Company overview

D’leteren is not only one of Belgium’s leading distributors of numerous automotive brands, including Volkswagen, Audi, SEAT, CUPRA, ŠKODA, Bentley, Lamborghini, Bugatti, Rimac, Porsche, as the Company has transformed itself, over the last 5 years, to offer a holistic approach to mobility.

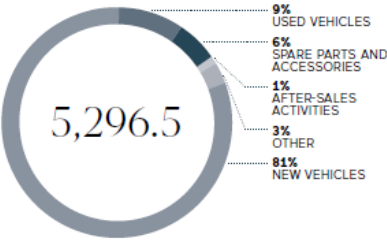
- D’leteren is promoting electromobility through its long-term partnership with the Volkswagen Group which has been actively working on its electrification strategy and aims to become a major player in the electric vehicle market. To facilitate the transition to electric cars for its customers, D’leteren is complementing its EV (Electric Vehicle) proposal with a broad and green energy bundle offering (EDI charging stations and GoSolar solar panels and stationary batteries).
- D’leteren has extensive expertise in the used vehicle market and across the whole lifecycle of vehicles with comprehensive maintenance and repair services extending vehicle lifespans.
- The Company has developed an extensive portfolio of new mobility services: free floating car sharing with Poppy, paid passenger transport with Husk and Taxis Verts, jockey services with Mobvious, the management of autonomous vehicles with USH, etc.

- D’leteren is active in the (e-)bike retail market with its brand Lucien and aims to become a leading retailer offering new and used bikes and after-sales services.
- In 2023, the Company, together with Microlino, entered the micromobility arena, plugging the gap between cars and two-wheeled vehicles. Microlino is an electric microcar which enables efficient, light urban CO<sub>2</sub>-free mobility. D’leteren is also Microlino’s official representative in France and Luxembourg.

Through its investment in Volkswagen D’leteren Finance, D’leteren offers financing for its mobility solutions, including charging stations and solar panels.D’leteren's customers are dealers to whom D'leteren supplies vehicles, parts and accessories and support services, as well as private and professional end customers.

REVENUE BREAKDOWN BY ACTIVITY

(€ million)	2021	2022	2023
New vehicles	2,615.1	2,893.2	4,294.5
Used vehicles	289.0	305.9	449.2
Spare parts and accessories	244.1	275.1	319.2
After-sales activities	56.5	54.5	74.8
Other	34.2	80.9	158.8
<b>D'IETEREN AUTOMOTIVE</b>	<b>3,238.9</b>	<b>3,609.5</b>	<b>5,296.5</b>



### 3. Strategy for Value Creation

Mobility is the engine of a prosperous society, contributing to economic activity and social life. As a family-owned business that has been driving Belgian mobility for almost 220 years, D'leteren works long-term for a positive impact.

D'leteren has a clear mission to build seamless and sustainable mobility for everyone. Over the past 5 years, the Company has moved forward on several fronts to expand its mobility solutions to offer end-to-end mobility ecosystems that cater to a variety of our customers' needs. Through all these initiatives, D'leteren is demonstrating its desire to become the natural choice when it comes to mobility in Belgium.

As a cross-cutting theme, sustainability has been integrated into each of D'leteren's activities, with the Company remaining at the forefront of accelerating the decarbonisation of mobility and making mobility a lever for sustainable development for future generations.

The D'leteren mission brings together the Company, its employees, its customers and its shareholders, and reconciles economic performance with a positive impact on people and the planet.

D'leteren focuses on 4 main levers to create value for its key stakeholders.

- For customers: providing high-quality mobility products and services to generate superior satisfaction.
- For employees: fostering a learning, fair and stimulating work environment to trigger employee engagement.
- For partners and suppliers: building strong, collaborative, and mutually beneficial partnerships to deliver enhanced value to customers and other stakeholders. D'leteren has been fostering long-term relationships by demonstrating commitment, with local dealers and the Volkswagen Group, since 1948.
- For society at large: by sharing its knowledge of the market and being a benchmark, D'leteren aims to become a source of inspiration in the field of sustainable mobility.

D'leteren strongly believes that engagement and cooperation with its stakeholders play a fundamental role in creating value for the business. For this reason, it is committed to maintaining a proactive and transparent dialogue with its stakeholders which allows to build stable relationships, promote positive and mutually beneficial interactions, and create a positive impact in the areas in which the company operates.

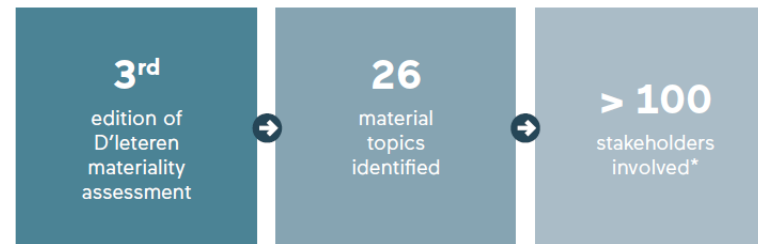
D'leteren communicates regularly with its stakeholders through a variety of channels. For instance, regular customer and employee surveys are conducted. On a bi-annual basis, D'leteren organises a large-scale qualitative market study called Polaris that targets both private and professional markets, and publicly shares the results ([Polaris Mobility Survey \(dieteren.be\)](https://www.dieteren.be/polaris)). It organises topic-specific dialogues with its dealers and has regular meetings with its main suppliers. The company also participates in discussions and informational forums and continues its advocacy work and participation in industry coalitions.

Following the double materiality exercise, its main stakeholders were consulted and D'leteren has undertaken actions to keep them informed of the sustainability strategy put in place and of the Company's progress on issues that matter to them.

## 4. ESG methodology and governance

### 4.1. Materiality analysis process and results for 2023

In 2023, D'leteren conducted a double materiality assessment, in line with the ESRS requirements.



\* 15 stakeholder groups: customers, dealers, suppliers, automotive representative, environmental experts, local communities, employees, trade unions, internal experts, shareholders, general management

This assessment is a strategic and valuable management tool for D'leteren as it helps:

- to determine which ESG topics are most important for D'leteren's internal and external stakeholders in terms of how impacts are perceived along its value chain, and how they could translate into both opportunities and risks for the Company;
- to provide input for the content of sustainability reporting, the sustainability strategy, the five-year strategic plan, the management incentive plan of the management and the integrated risk management system;
- to strengthen relationships and trust with D'leteren's key stakeholders by ensuring that their views and priorities are considered and reflected in the Company's strategy.

The materiality assessment process was conducted in line with the ESRS requirements and was divided into 5 main phases.



To evaluate the economic, social, and environmental challenges, identify the risks, limit their impacts and take full advantage of the relative opportunities as part of the broader materiality analysis process, an analysis of the main current and future ESG megatrends was carried out. Based on the main publications within the scope of the transport sector and current public policies as well as the previous materiality assessment carried out in 2020, this analysis of the sustainability context for D’leteren identified several ESG topics, across D’leteren’s own operations and its value chain. These topics include climate change, preservation of resources, health and safety, labor rights, and consumer safety. The impacts of these identified ESG topics were evaluated by stakeholders and experts with significant influence and impact on D’leteren’s value chain.



15 stakeholder groups whose interests are affected or may be affected by the D’leteren activities were identified across the Company’s value chain.

The relevant stakeholders were specified for each sustainability topic and specific questionnaires were used for each stakeholder group. Stakeholders rated these topics according to the following parameters: severity – measured as scale (how detrimental or beneficial), scope (how widespread or number of cases), irremediability for negative impacts – and likelihood (only measured for potential impact).







A financial assessment of the identified sustainability issues was then conducted to measure the materiality of the topic from a financial perspective. This assessment, partly based on D'leteren's existing risk management policy, was based on two criteria: the likelihood of occurrence (i.e. the probability that a financial risk occurs/materialises on a short-to medium-term basis, 1-5 years) and the magnitude (i.e. How detrimental / beneficial is the issue for D'leteren economic performance ?)

The financial and impact results of a double materiality assessment were combined, providing D’leteren with a holistic understanding of its main ESG issues and enabling the Company to prioritise actions that contribute to both sustainable business practices and positive societal outcomes.

## 4.2. Material topics emerging from the double materiality assessment

The scale ●●● presented in this table reflects the level of materiality established by the double-materiality assessment.

Impact materiality level	Type of impact	Main impacts generated	<< Material topics >>	Perimeter O=Own Operations VC=Value Chain	Double Materiality level	Financial materiality level	Risk (-) or opportunity (+)	Main risks or opportunities generated	Strategy & Performance (ref. chapters/paragraphs of this report)
<b>Strategic Topics</b>									
●●●	-	Failure to anticipate climate change adaptation measures could impact the supply chain, decreasing the safety and working conditions of local workforce and harming local communities.	<b>E1 – Climate change adaptation</b>	O & VC	Strategic topic	●●●	-	Current regulations around internal combustion engines and consumer behavioural change could impact D'leteren businesses.	Project ZERO – Building a low-carbon mobility ecosystem
●●●	+	The uptake of electric vehicles (EVs) and alternatives like bikes and car-sharing can cut road congestion, pollution, CO <sub>2</sub> emissions, and enhance urban life, while also boosting local economies.	<b>E1 – Climate change adaptation</b>	O & VC	Strategic topic	●●●	+	D'leteren can tap into sustainable transport solutions and new market segments, considering the younger generation's preference for fewer vehicles, increased corporate mobility budgets, the popularity of car-sharing and bikes, and tighter car regulations.	Project ZERO – Building a low-carbon mobility ecosystem
●●●	-	Car manufacturing and its value chain are highly energy-intensive. Passenger vehicles sold by D'leteren, including the production and use phases, are major GHG emission contributors.	<b>E1 – Climate change mitigation</b>	O & VC	Strategic topic	●●●	-	D'leteren faces risks from the scarcity of resources needed for products like electric vehicles, bikes, solar panels, and charging stations. Transitioning to electric vehicles, switching to renewable energy, and installing electric infrastructure like charging stations, increase costs for customers and could reduce D'leteren sales.	Project ZERO – Building a low-carbon mobility ecosystem
●●●	-	Vehicle production is energy-intensive, and cars or e-bikes are powered by energy. D'leteren's own operations also consume energy to run its operations, impacting climate and air quality.	<b>E1 – Energy</b>	O & VC	Strategic topic	●●●	-	D'leteren's operations in Europe align with the Green Deal's climate neutrality goal for 2050 and the "Fit for 55" package, which aims for a 55% emissions reduction and 42.5% renewable energy by 2030, plus at least 11.7% energy savings from projected 2030 consumption levels.	Project ZERO – Building a low-carbon mobility ecosystem
●●●	-	The metal mining industry is a significant air pollution contributor, with airborne particulates also affecting worker health. Fuel combustion in vehicles emits harmful substances, contributing to air quality issues and damaging ecosystems.	<b>E2 – Pollution of air</b>	VC	Strategic topic	●●●	-	D'leteren has limited direct control over Volkswagen's production process; however, any regulatory infringements or failure to meet customer expectations may have an impact on the Company's distribution of vehicles.	Project ZERO – Building a low-carbon mobility ecosystem





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	-	Vehicle production uses substantial water volumes during the production processes (metalworking, painting, etc.) and requires water-intensive raw materials (metals, textiles). This water usage affects ecosystems and communities, potentially leading to water scarcity and stress. Car wash stations, part of the automotive industry's downstream operations, use on average 150L per standard vehicle.	<b>E3 – Water</b>	O & VC	Strategic topic		-	Direct risks are minimal, mainly concerning potential water usage bans during droughts. In the value chain, a significant risk is the potential impact of water scarcity on crucial suppliers, which could disrupt the supply chain.	Project ZERO – Building a low-carbon mobility ecosystem
	-	<b>Inflows:</b> EVs are a major consumer of raw materials (nickel, copper, etc.) with electric bikes and solar industries also being dependent on various materials (lead, lithium, silver). Extracting these materials is energy-intensive and causes significant ecological disruption. Additionally, mining activities are frequently associated with human rights violations and negatively impact local communities, including displacements and socioeconomic disruptions. <b>Outflows:</b> Incorporating circularity in product development and sourcing is vital for the automotive industry to reduce resource pressure. Managing end-of-life batteries is also crucial due to toxicity concerns. Similarly, solar panels can become hazardous waste.	<b>E5 – Resources</b>	VC	Strategic topic		-	D'leteren faces risks from the scarcity of resources needed for products like electric vehicles, batteries, solar panels, and charging stations. Rising costs due to depletion of or reliance on recycled materials might reduce customer appeal for these mobility options.	Project ZERO – Building a low-carbon mobility ecosystem
	-	Vehicle production operations generate significant waste, including hazardous materials. D'leteren and the dealerships produce waste such as used oil, scrap metal, tires, packaging. Improper disposal or recycling of these wastes impacts biodiversity and pollutes air and water, affecting local communities.	<b>E5 – Waste</b>	O & VC	Strategic topic		-	D'leteren's direct costs involve potential fines and increased disposal fees due to improper waste management. However, the Company's limited direct impact from waste issues in its value chain is mitigated by its effective waste management.	Project ZERO – Building a low-carbon mobility ecosystem

Impact materiality level	Type of impact	Main impacts generated	<< Material topics >>	Perimeter O=Own Operations VC=Value Chain	Double Materiality level	Financial materiality level	Risk (-) or opportunity (+)	Main risks or opportunities generated	Strategy & Performance (ref. chapters/paragraphs of this report)
	-	The automotive industry's use of hazardous chemicals and machinery places workers at higher risk of injury, affecting their quality of life and potentially leading to prolonged absence or premature death. Neglecting employee health and safety can lead to increased healthcare and socioeconomic costs.	<b>S1 – Health &amp; Safety</b>	O & VC	Strategic topic		-	D'leteren faces direct operational costs (like salaries) and indirect costs (like replacement expenses) due to employee injuries, burnout, and absenteeism.	Providing fair and meaningful work within our mobility ecosystem
	-	Raw material extraction and manufacturing is plagued by widespread child labour and human rights abuses, exacerbated by high corruption risks. These issues negatively affect the health, safety, and human rights of affected populations.	<b>S2 – Child labour</b>	VC	Strategic topic		-	The occurrence of child labour and/or forced labour abuses within the value chain may constitute operational risks due to supply disruptions, reputational damages potentially impacting sales and investor confidence, as well as non-compliance risks.	Responsible business foundations
	-	In 2023, Belgium recorded 39,214 road accidents with over 48,362 victims and 562 fatalities. Accidents also lead to non-fatal consequences for consumers and insurance companies, such as medical expenses, lost income due to reduced earning capacity and ongoing medical care.	<b>S4 – Consumer Safety</b>	O & VC	Strategic topic		-	D'leteren faces potential reputational damages from product deficiencies and could be liable for accidents arising from vehicle defects if proper inspection or repairs aren't conducted, leading to financial and legal issues. New technologies introduce new risks.	Building an inclusive mobility ecosystem
	-	Connected cars and 'smart'-driving solutions rely on collecting and processing substantial personal and sensitive data. The risk of cyberattacks and data breaches could expose personal and sensitive information to unauthorised access.	<b>S4 – Consumer Privacy</b>	O	Strategic topic		-	High fines for GDPR violations, impacting D'leteren's bottom line	Building an inclusive mobility ecosystem
	-	The car manufacturing industry faces ethical controversies. A poor corporate culture can result in unethical behaviours, leading to societal problems like trust erosion or unsafe working conditions, and can also cause environmental issues, including air and water pollution.	<b>G1 – Company Culture</b>	VC	Strategic topic		-	Engaging in unethical behaviour stemming from D'leteren's own operations and value chain are reputational, leading to potential financial losses.	Providing fair and meaningful work within our mobility ecosystem



Impact materiality level	Type of impact	Main impacts generated	<< Material topics >>	Perimeter O=Own Operations VC=Value Chain	Double Materiality level	Financial materiality level	Risk (-) or opportunity (+)	Main risks or opportunities generated	Strategy & Performance (ref. chapters/paragraphs of this report)
	-	Raw material extraction has faced scrutiny over bribery and corruption, often due to complex technicalities and close private-public sector relations in obtaining mining licenses.	<b>G1 – Corruption &amp; Bribery</b>	VC	Strategic topic		-	Reported corruption and bribery cases can lead to employee loss, operational inefficiencies, reputational damage, public trust loss, and significant fines.	Responsible business foundations
	-	Enforcing accessibility to mobility solutions such as automobiles potentially increases the number of car users and related environmental impacts.	<b>Entity specific – Accessible mobility Solutions</b>	O & VC	Strategic topic		-	Poor accessibility may lead to a loss of opportunities.	Building an inclusive mobility ecosystem
	-	Brussels ranks as the 14 <sup>th</sup> slowest city worldwide for a 10 km drive, with Antwerp and Liège also featuring in the top 200. This leads to significant environmental impacts from traffic congestion, including air pollution, and noise pollution.	<b>Entity specific – Road Congestion</b>	O & VC	Strategic topic		-	Limited risks/opportunities identified.	Building an inclusive mobility ecosystem
	+	Meeting customer expectations brings satisfaction as well as happiness and helps to build trust.	<b>Entity specific – Customer satisfaction</b>	O	Strategic topic		-	Customer dissatisfaction in D’leteren could result in reduced sales, reputational damage, and compensation costs over a limited period of time.	Building an inclusive mobility ecosystem
	-	Unethical marketing can erode trust, lead to regulatory action and risk exposing sensitive customer information. Notable examples in the industry include the Dieselpgate scandal.	<b>Entity Specific – Responsible marketing practices</b>	O & VC	Strategic topic		-	Marketing in the automotive industry, which focuses on vehicle features, is closely regulated. However, certain unethical marketing practices present significant risks to D’leteren’s reputation, leading to a loss of consumer confidence and market share.	Responsible business foundations
<b>Topics to monitor</b>									
	-	The automotive sector has a major impact in terms of wastewater, and the extraction activities used to manufacture vehicles pollute bodies of water with heavy metals and other contaminants.	<b>E2 – Pollution of water</b>	O	Topic to monitor		-	Limited risk identified	Project ZERO – Building a low-carbon mobility ecosystem

Impact materiality level	Type of impact	Main impacts generated	<< Material topics >>	Perimeter O=Own Operations VC=Value Chain	Double Materiality level	Financial materiality level	Risk (-) or opportunity (+)	Main risks or opportunities generated	Strategy & Performance (ref. chapters/paragraphs of this report)
	+	Investing in employee growth boosts brain health, employability and wellbeing and prepares employees for future challenges.	<b>S1 – Training &amp; skills development</b>	O	Topic to monitor		-	Fleet electrification and digitalisation necessitate upskilling and reskilling. In the value chain, unskilled workers in manufacturing and dealerships could impact D'leteren's products and services, leading to operational disruptions and financial losses.	Providing fair and meaningful work within our mobility ecosystem
	+	Collective agreements combat inequality, including the gender pay gap, and discrimination, ensuring workers' rights and decent working conditions, thus fostering trust.	<b>S1 – Freedom of association</b>	VC	Topic to monitor		-	Limited risks/opportunities identified	Providing fair and meaningful work within our mobility ecosystem
	-	Long working hours and work-related pressure can lead to mental health issues, increasing healthcare costs and affecting overall wellbeing.	<b>S1 – Work-life balance</b>	O	Topic to monitor		-	Work-life imbalance can lead to reduced performance, lower retention rates, and increase absenteeism and staff turnover due to health issues or decreased worker satisfaction.	Providing fair and meaningful work within our mobility ecosystem
	-	A diverse workforce enhances cultural awareness, personal growth, equality, employee happiness, engagement, and social collaboration. It also helps companies better understand and respond to diverse customer needs and expectations.	<b>S1 – Diversity</b>	O	Topic to monitor		-	A low female representation poses operational risks like challenges in attracting talent and potential performance dips due to lack of diversity.	Providing fair and meaningful work within our mobility ecosystem
	-	The automotive sector faces rapid transformation and market changes, resulting in job insecurity, higher stress, frustration and exhaustion, negatively impacting workers' health.	<b>S1 – Secure employment</b>	O	Topic to monitor		-	Insecure employment could lead to high absenteeism, increased turnover, poor performance, and potential strikes. Legal obligations and employee protections could lead to substantial costs in group dismissals.	Providing fair and meaningful work within our mobility ecosystem
	+	D'leteren is expanding its renewable energy solutions, like solar panels and home batteries, through its subsidiaries EDI and GoSolar, leading to a reduction in air pollution, health benefits and job creation.	<b>E1 – Energy</b>	O & VC	Topic to monitor			New opportunities emerging from shifting to fossil fuel consumption to renewable energy to charge EV's.	Project ZERO – Building a low-carbon mobility ecosystem

Impact materiality level	Type of impact	Main impacts generated	<< Material topics >>	Perimeter O=Own Operations VC=Value Chain	Double Materiality level	Financial materiality level	Risk (-) or opportunity (+)	Main risks or opportunities generated	Strategy & Performance (ref. chapters/paragraphs of this report)
	+	The provision of accessible sustainable solutions, such as car-sharing, bike, taxis, and micromobility, is impacting society positively by promoting efficiency, sustainability, social equity, and quality of life.	<b>Entity Specific – Sustainable Mobility solutions through leadership</b>	O & VC	Topic to monitor		+	No significant opportunity identified	Building an inclusive mobility ecosystem
	+	High engagement levels lead to a better quality of life for employees, who find purpose in their work and feel connected to a company they trust and value. This engagement aids in retaining talent and contributes to economic growth.	<b>Entity Specific – Employee engagement</b>	O	Topic to monitor		+	Engaged employees significantly benefit D'leteren, reducing absenteeism, turnover and increasing productivity.	Providing fair and meaningful work within our mobility ecosystem

### 4.3. ESG@D'leteren: all teams involved

ESG issues are addressed at different levels of governance.

D'leteren's Board of Directors ensures oversight of the D'leteren ESG strategy. Its members are updated at least 4 times a year according to the evolution of the ESG strategy and performance. In addition, this year the Board of Directors received specific information on the net-zero trajectory to which D'leteren is committed and the implications for its activities.

In 2023, D'leteren's Executive Committee defined the ESG roadmap, in collaboration with the ESG team, and ensures that progress is in line with the Company's non-financial ambition and objectives. In 2023, specific workshops on ESG topics were organised with the Executive Committee to validate actions plan and define the related budget.

The ESG team is responsible for developing and implementing the ESG approach. The team is also at the forefront of developing environmental, social and corporate governance policies and procedures and supporting ESG strategic initiatives.

ESG initiative owners have been assigned within relevant departments to achieve specific ESG objectives.

- Employee wellbeing and Diversity & Inclusion: Human Resources
- Customer Satisfaction: Marketing Department
- As the environment and sustainable mobility topics are cut across D'leteren and all its subsidiaries, the initiatives carried out on these subjects are monitored by the ESG team.

The ESG team is also in charge of non-financial reporting, in collaboration with the ESG initiative owners, the ESG data owners and the financial teams. To comply with CSRD requirements, the teams involved are regularly trained and specific support has been initiated to ensure alignment.

To engage all D'leteren teams in D'leteren's sustainability strategy, an awareness-raising campaign on environmental, social and governance matters was organised across all entities.

- 4-hour workshops for Senior Management were given by external experts on all ESG aspects and their implications for corporate strategy.
- The D'leteren Climate School was launched in the second half of 2023. It provides mandatory e-learning to understand climate issues, and how to act within specific functions (IT, HR, Procurement, Marketing).
- The progress made on the main ESG initiatives is regularly communicated to D'leteren's senior management teams and then relayed to all employees via its internal communication tools.

To demonstrate its commitment to reducing the carbon footprint of its activities, D'leteren has linked its financial policy to its environmental commitment by taking out a Sustainability Linked Loan in December 2021. The financing conditions are indexed to its objective of reducing its emissions by 50% by 2025, based on its historical perimeter, and to D'leteren's active participation in the greening of the Belgian car fleet, committing to achieving 28% of electric vehicles among its sales by 2025.

In 2022, D'leteren also committed to the Science Based Target Initiative, thereby contributing to the Paris Agreement's goal of limiting global warming to 1.5° Celsius above pre-industrial levels. In this context, D'leteren has also joined the Belgian Alliance for Climate Action, which brings together about 200 Belgian companies and organisations committed to the climate.

The ESG ambition is also translated through the integration of sustainability linked KPIs into the management incentive plan.

## 5. D'leteren sustainability roadmap

The sustainability roadmap, which covers the 2024-2030 period, sets out the framework for D'leteren's actions on sustainability issues and provides a cornerstone for the D'leteren's mission: building seamless and sustainable mobility for everyone.

This roadmap therefore aims to implement an integrated strategy combining commercial and financial objectives with environmental, social and governance challenges identified by the double materiality analysis. This plan is therefore the result of an integrated approach, a multi-stakeholder perspective and an impact-driven analysis.

This roadmap covers all D'leteren entities, i.e. D'leteren Automotive and its majority-owned subsidiaries.



### 5.1. Project ZERO – Building a low-carbon mobility ecosystem

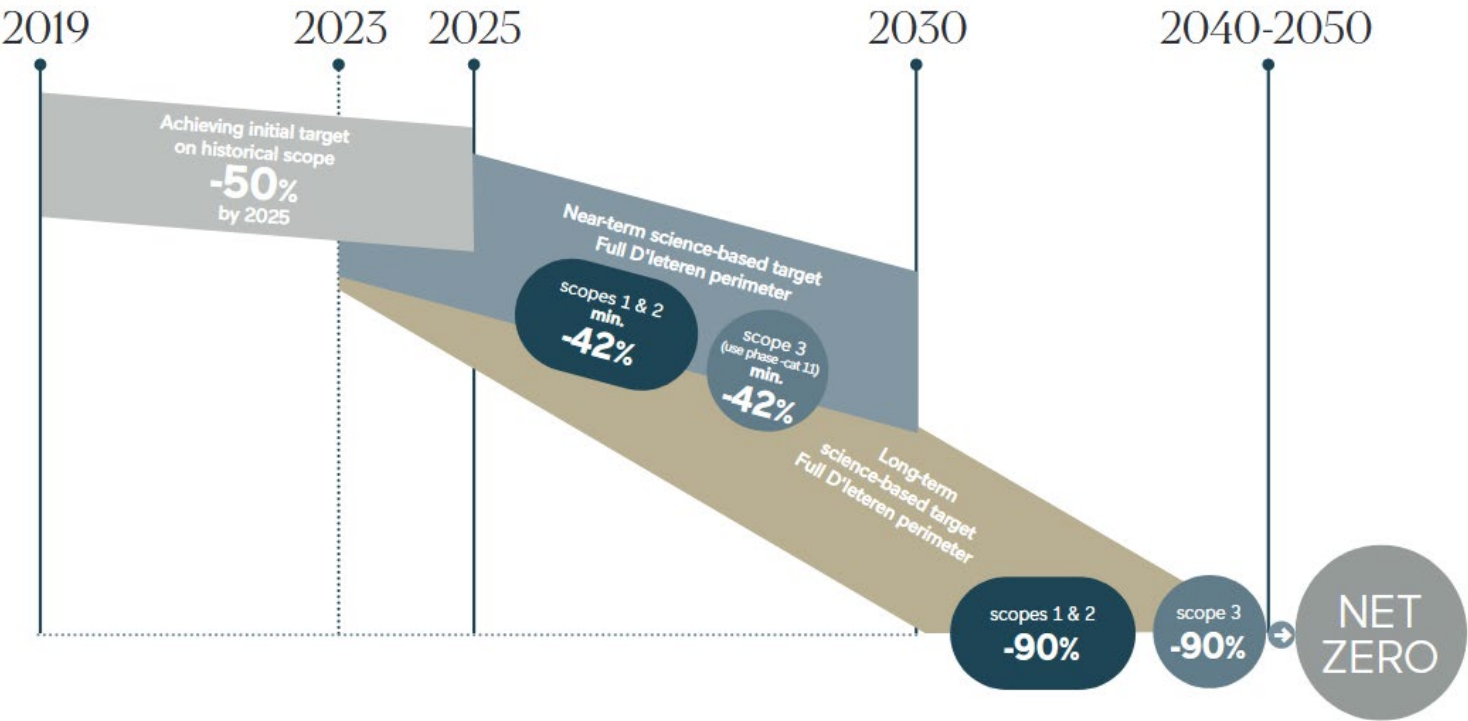
**Our approach.** D’leteren has an ambitious transition plan called “Project ZERO”. Project Zero is how we will transform our company into a net-zero company while changing the mobility sector by offering the necessary low carbon mobility solutions to our customers and consumers.

**Policies/actions.** Project Zero was developed in close collaboration with the Executive Committee and is fully aligned with the Company’s mission and strategy. Project Zero is integrated into the Company’s 5-year plan and has been approved by the Board of Directors. Starting in 2024 and running until 2030 (inclusive), each concerned department must report on its CO<sub>2</sub> trajectory, next to its profitability trajectory, based on volume estimations. At this stage, the Company does not apply internal carbon pricing schemes due to a clearly defined CO<sub>2</sub> trajectory to 2030.

Project ZERO will be achieved in two phases.

- In the first phase, D’leteren will achieve its initial target based on its historical perimeter (D’leteren Automotive, D’leteren Centres, Porsche Centres Antwerp & Brussels). Compared to 2019, it is reducing its direct CO<sub>2</sub> emissions and limiting indirect emissions by 50% in 2025.
- In the second phase, with 2023 as base year, D’leteren will start to reduce greenhouse gas emissions across its three scopes, in line with the Paris Agreement. To this end, D’leteren will follow a decarbonisation trajectory compatible with a warming limit of +1.5°C, to be certified by SBTi in 2024.

#### OUR ROADMAP TO NET-ZERO



### 5.1.1. PHASE 1 ON THE HISTORICAL PERIMETER - REDUCING DIRECT GREENHOUSE GAS EMISSIONS AND LIMITED INDIRECT EMISSIONS BY 50% IN 2025 (2019 AS BASE YEAR)

	Base year	2022	2023	Target 2025
% GHG reduction (historical scope)	2019	43%	36%	50%

- The entities within the perimeter are: D'leteren Automotive, D'leteren Centres, Porsche Centre Antwerp & Porsche Centre Brussels (covering ~85% of Gross Margin and 95+% of EBIT generated by D'leteren in 2019)
- The historical perimeter covers scope 1 and scope 2 emissions, as well as some scope 3 emissions, namely the emissions related to home-work commuting, logistics, business travel, waste and upstream emissions from scope 1 and 2.
- The reason for maintaining this historical perimeter is that D'leteren has made an external commitment to achieve the 50% reduction target by 2025, as part of the Sustainability-Linked Loan and the management incentive plan of the management.

Several actions have been taken since 2019, reducing emissions by 36% in 2023 vs 2019, and further actions will be taken to meet the 2025 target.

- Several energy-intensive buildings were closed. The size of the headquarters was reduced in line with office occupancy levels. Office temperatures were lowered to 19 degrees. Since 2021, D'leteren has been sourcing more than 80% of its electricity from green suppliers.
- The mobility policy has been adapted to gradually increase the proportion of electric vehicles used by employees and to offer a wider range of alternative solutions.
- D'leteren encourages teleworking and remote conferencing, leading to less employee commuting.
- Emissions related to the logistics of delivering new vehicles to dealerships across Belgium rose sharply in 2023, following a year of significant vehicle supply shortages in 2022. To counter this, D'leteren has decided to use biofuel for at least 50% of its deliveries to the dealerships from 2024.
- Projects aimed at optimising the footprint, including the construction of new, 100% carbon-neutral buildings, are currently ongoing in collaboration with D'leteren Immo. D'leteren Park, Mobilis or New Kontich are three key building projects that will have a positive impact on CO<sub>2</sub> emissions from 2024.
- 75% of D'leteren Automotive's company vehicles will be electric by the beginning of 2025 (100% at the end of 2025), compared with around 30% by the end of 2023.

Carbon footprint	2019 (base year)	2022	2023	% 2023/2022	2025	Reduction target
<b>Scope 1 GHG emissions</b>						
Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	8,580	5,486	5,552	101.2%	4,300	
<b>Scope 2 GHG emissions</b>						
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	1,103	28	68	242.9%	-	
<b>Significant scope 3 GHG emissions</b>						
Total Gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> eq)	10,525	6,135	7,414	120.8%	5,700	
3 Fuel and energy-related activities (not included in scope 1 or scope 2)	2,064	1,406	1,253	89.1%	1,400	
4 Upstream transportation and distribution	6,294	3,849	5,008	130.1%	3,300	
5 Waste generated in operations	-	63	100	158.7%	100	
6 Business traveling	893	251	490	195.2%	300	
7 Employee commuting	1,274	566	564	99.6%	600	
<b>Total GHG emissions</b>						
<b>Total GHG emissions (market-based) (tCO<sub>2</sub>eq)</b>	<b>20,208</b>	<b>11,649</b>	<b>13,034</b>	<b>111.9%</b>	<b>10,000</b>	50%

Data highlighted in green is in the scope of the independent limited assurance performed by KPMG.

Scope 2 has increased due to an increase in grey electricity consumption and the new assumption on EV consumption where a 50% charging off-site share was assumed. Business travels almost doubled in FY23. 183 tCO<sub>2</sub>e are only due to the use private flights.

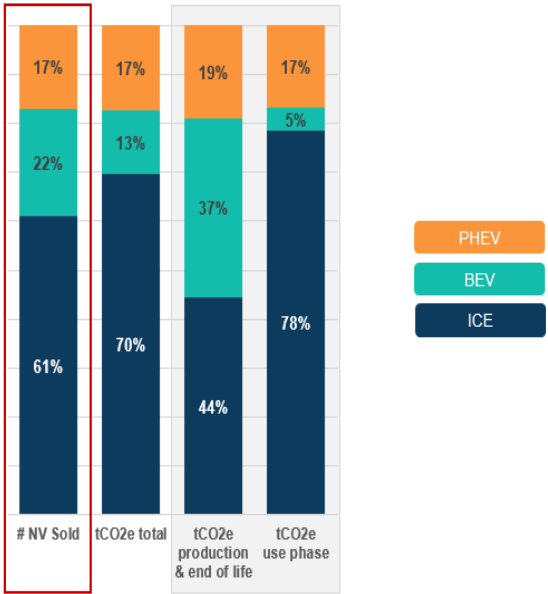
**5.1.2. PHASE 2 ON D’IETEREN’S ENTIRE VALUE CHAIN: REDUCING GREENHOUSE GAS EMISSIONS BY MIN. 42% BY 2030 (BASE YEAR 2023) TO BECOME NET-ZERO ACROSS D’IETEREN’S ENTIRE VALUE CHAIN BY 2050 AT THE LATEST.**

This is an ambitious plan because:

- it covers scopes 1, 2 and 3 defined by the GHG Protocol, i.e. the direct and indirect emissions produced by the Company, its fully consolidated subsidiaries and its value chain (suppliers, customers as well as companies in which D’Ieteren has a minority interest such as Volkswagen D’Ieteren Finance);
- becoming net-zero is challenging for a company whose business is historically based on high carbon products.

In 2023 D’Ieteren’s carbon footprint reached 5.3 million tonnes CO<sub>2</sub>e, compared with 3.8 million in 2022.

- **>99% of the emissions are related to Scope 3** and more specifically to the purchased goods and services (30%) and the use of sold products categories (69% of the overall emissions).
- The rise in emissions between 2022 and 2023 is largely due to the increase in the number of new vehicles sold – from 89,502 to 126,122 units.
- New cars represent a major part of emissions (86% of total emissions) due to their purchase (construction of materials bought), the customer use phase and their end of life.



- Petrol cars represent most of the cars sold and most of emissions related to cars (47%).
- Electric car sales registered a sharp rise in 2023 with 22% of total vehicles sold by D’Ieteren against 11% in 2022, with D’Ieteren being the leader in this segment in Belgium. Electric and hybrid cars are more emissive than thermal cars in the construction phase, but less emissive during the use phase, and benefit from a favourable Belgian electricity mix.

By 2024, D’Ieteren will submit the **following targets** to the SBTi. These targets are based on the cross-sector and transport sector guidance published by SBTi.

- **Scope 1 & 2:** GHG emission reduction of at least 42% by 2030 in absolute contraction mainly through 100% electric company cars for all entities in scope, 100% green electricity in all the sites and better isolated buildings; 90% reduction target by 2050 at the latest.
- **Scope 3:** GHG emission reduction of min. 42% in absolute contraction (cat. 11 – Use of sold products); 90% reduction target by 2050 at the latest.

3 levers will be used to achieve this reduction for scope 3:

**LEVER 1 – Electrification together with renewable energy**

- We are targeting a share of fully electric cars in our sales of at least 60% by 2030. As petrol and diesel cars emit over twice the amount of CO<sub>2</sub> along their life cycle compared to electric vehicles (EV’s), the adoption of EVs plays a significant role in reducing emissions.
- Electrification requires a holistic view, because to facilitate the transition to electric cars for our customers, we need to ensure that charging is easy by complementing our electric vehicle offering with a green energy bundle (EDI charging stations, GoSolar panels and stationary batteries).
- D’Ieteren can also rely on the Volkswagen Group’s commitment to the Paris Climate Agreement. The Volkswagen Group’s commitment is to reduce its absolute scopes 1 and 2 by 50.4% by 2030 and to reduce scope 3 from use of sold products by 30% per vehicle km by 2030 (from a 2018 base year). They will achieve this goal through their electric offensive, reduction measures and switching to renewable energies.

**LEVER 2 – Accelerating the growth of low-carbon mobility products and solutions**

Consumers are carefully curating their mobility choices according their context. In order to cater for this, we have enlarged our offering with bikes, shared mobility and driver-assisted mobility.

- Through e-bikes with Lucien, shared mobility with Taxis Verts and Poppy, or micromobility with Microlino, the goal is to transition from high-carbon to low-carbon products.
- With mBrella, D’Ieteren helps business customers to design flexible and multimodal mobility plans, thereby promoting the utilisation of the most appropriate mode of transport according to circumstances.



### LEVER 3 – Prolonging the life of products, using cars in a smarter way and meeting customer needs in new ways

The demand from individual and corporate customers is gradually shifting towards flexible models based on utilisation rather than ownership of the car. To meet these expectations, D'leteren is considering mastering the transformation from one-off asset sales to vehicle-as-a-service models. This is crucial for optimizing vehicle utilisation and, consequently, reducing the production of new vehicles. Based on the principles of the circular economy, D'leteren could thus address consumers' mobility needs more efficiently and with fewer resource consumptions, resulting in lower emissions. This pillar is currently under analysis and development.

Carbon footprint	New scope 2023
<b>Scope 1 GHG emissions</b>	
Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	9,929
<b>Scope 2 GHG emissions</b>	
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	2,405
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	502
<b>Significant scope 3 GHG emissions</b>	
Total Gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> eq)	5,247,095
1 Purchased goods and services	1,509,234
2 Capital goods	24,329
3 Fuel and energy-related activities (not included in scope 1 or scope 2)	2,389
4 Upstream transportation and distribution	20,212
5 Waste generated in operations	269
6 Business traveling	521
7 Employee commuting	1,026
9 Downstream transportation	236
11 Use of sold products	3,666,809
12 End-of-life treatment of sold products	17,268
13 Downstream leased assets	4,505
15 Investments	298
<b>Total GHG emissions</b>	
<b>Total GHG emissions (location-based) (tCO<sub>2</sub>eq)</b>	<b>5,259,429</b>
<b>Total GHG emissions (market-based) (tCO<sub>2</sub>eq)</b>	<b>5,257,526</b>

Data highlighted in green is in the scope of the independent limited assurance performed by KPMG.

VDFin related emissions are included in D'leteren total emissions under Scope 3 Cat. 15 – Investments based on the D'leteren ownership share (i.e. 50% of VDFin Scope 1 & 2 emissions).

The car construction is included in category 1 and is based on Volkswagen LCAs. For the usage phase (cat.11), we estimate the total distance travelled during the vehicle lifetime to be 200,000km. For hybrid vehicles, some distance the hypothesis taken is based on the following split: 47 % electricity use / 53 % fuel use. Maserati brand scope 3 related emissions are not included.

Energy consumption and mix	Unit	2023
(1) Fuel consumption from coal and coal products	MWh	0
(2) Fuel consumption from crude oil and petroleum products	MWh	25,464
(3) Fuel consumption from natural gas	MWh	24,853
(4) Fuel consumption from other fossil sources	MWh	0
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	1,163
<b>(6) Total fossil energy consumption (calculated as the sum of lines 1 to 5)</b>	<b>MWh</b>	<b>51,480</b>
Share of fossil sources in total energy consumption (%)	%	72.4%
(7) Consumption from nuclear sources (MWh)	MWh	1,560
Share of consumption from nuclear sources in total energy consumption (%)	%	2%
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	MWh	0
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	MWh	14,783
(10) The consumption of self-generated non-fuel renewable energy (MWh)	MWh	3,308
<b>(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)</b>	<b>MWh</b>	<b>18,091</b>
Share of renewable sources in total energy consumption (%)	%	25.4%
<b>Total energy consumption (MWh) (calculated as the sum of lines 6, 7 and 11)</b>	<b>MWh</b>	<b>71,131</b>

Energy intensity per net revenue	2022	2023	% 2023/2022
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/€m)	-	13.43	

Data 2022 not available.

GHG intensity per net revenue	2022	2023	% 2023/2022
Total GHG emissions (location-based) per net revenue (tCO <sub>2</sub> eq/€m)	-	993.0	-
Total GHG emissions (market-based) per net revenue (tCO <sub>2</sub> eq/€m)	-	722.4	-

Data 2022 not available

### 5.1.3. PROTECTING NATURAL ECOSYSTEMS

**Policies/actions.** On its sites and where possible, D'leteren incorporates biodiverse green areas in collaboration with its main landlord D'leteren Immo. Its main new building project, the D'leteren Park that will be opened at the end of 2024, will include more than 25,000m<sup>2</sup> of biodiverse green areas to enhance the local fauna and flora. About 7,800m<sup>2</sup> of infrastructure is planned to handle rainwater in this project area, which will be implemented at the end of 2024.

As natural ecosystems – and the biodiversity they contain – are carbon sinks, providing nature-based solutions to climate change, D'leteren invests in protecting, managing, and restoring forests in Belgium. In 2023, D'leteren signed a 3-year partnership agreement with the Sylva Nova forestry company in Belgium, for an annual amount of €169,000. This partnership mainly concerns the preservation of 164 hectares of forest in Belgium through operational actions with added environmental value (maintenance, planting of diversification areas, conservation of potential wetlands, etc.). Complementary planting actions are also organised, involving 22,500 trees per year, i.e. around 67,500 trees over the contract. D'leteren has also undertaken a 3-year partnership with Natagora and Natuurpunt in Belgium for the preservation of nature reserves (€20,000/year).

### 5.1.4. OTHER ENVIRONMENTAL TOPICS

**Our approach.** As natural resources are finite, it is impossible to aim for sustainable growth without setting up a circular system for resource consumption. This is a critical issue for D'leteren, which at this stage relies on the strong processes put in place by the Volkswagen Group to produce its vehicles.

**Politics/actions.** The Volkswagen Group's ongoing decarbonisation strategy is an important driver of the circular economy. To significantly reduce its CO<sub>2</sub> emissions, the Group is aiming for an increasing use of secondary materials and the establishment of closed material loops.

Recognising the importance of this topic, the Volkswagen Group has anchored the circular economy as a pivotal topic in its NEW AUTO Group Strategy. For the first steps regarding circular economy, the Group has concentrated on the aspects of batteries, steel, aluminium and plastics. Regarding waste disposal in production, the Group aims to reduce the quantity of waste produced and to reuse unavoidable waste to create high-quality materials. In addition to waste, another focus is on the resource of water, the reduction of freshwater consumption, the efficiency in water use, particularly in water stress areas, and the minimisation of pollution.

All information about these topics and the related processes can be found on the website of the Volkswagen Group (via this link: [ESG-Performance & Reporting | Volkswagen Group \(volkswagen-group.com\)](https://www.volkswagen-group.com/esg)).

For its part, D'leteren is also taking steps to minimize the environmental impact of its activities.

- The topic of the circular economy is one of the three main levers of Project Zero, on which D'leteren will be focusing from 2024.
- The principles of circular design and construction have been taken as an objective for the new buildings occupied by D'leteren such as the D'leteren Park project where refurbishing existing buildings was chosen, as far as possible, over demolishing and, where possible, dismantled materials will be reused in the project.
- Regarding water, D'leteren and its dealerships use closed-loop systems that circulate water within the car wash process, maintaining water quality and reducing the need for fresh water.
- In disposing of and recycling its own waste, D'leteren collaborates with waste management companies, such as Veolia (for all waste), Oilco (for used oil), and Dechamps (for scrap metal). A project coordinator from the main waste collection company (Veolia) makes regular site visits to monitor and optimise waste management on site. D'leteren also facilitates the recycling of used vehicles by offering an additional allowance to people who provide their vehicles for recycling. D'leteren works with Febelauto whose mission is to organise and monitor the management of end-of-life vehicles in accordance with the European Directive. Currently, Febelauto recycles around 97% of the weight of these vehicles in an approved and controlled way.

Total waste generated by D'leteren Automotive (excluding subsidiaries) amounted to 511 tonnes in 2023 vs 494 tonnes in 2022.

Waste-related data	Unit	2022	2023 (DIA)	2023
Total amount of waste generated	Tonnes	1,666	511	1,880
<b>Total amount by weight diverted from disposal</b>	<b>Tonnes</b>	<b>1,258</b>	<b>407</b>	<b>1,299</b>
Total hazardous waste generated diverted from disposal	Tonnes	434	11	339
Total hazardous waste generated diverted from disposal to preparation for reuse	Tonnes	179	1	139
Total hazardous waste generated diverted from disposal to recycling	Tonnes	255	10	200
Total hazardous waste generated diverted from disposal to other recovery operations	Tonnes	0	0	0
Total non-hazardous waste generated diverted from disposal	Tonnes	824	396	959
Total non-hazardous waste generated diverted from disposal to preparation for reuse	Tonnes	47	0	334
Total non-hazardous waste generated diverted from disposal to recycling	Tonnes	777	396	625
Total non-hazardous waste generated diverted from disposal to other recovery operations	Tonnes	0	0	0
<b>Total amount by weight directed to disposal</b>	<b>Tonnes</b>	<b>408</b>	<b>104</b>	<b>581</b>
Total hazardous waste generated directed to disposal	Tonnes	20	1	73
Total hazardous waste generated directed to incineration	Tonnes	20	1	40
Total hazardous waste generated directed to landfill	Tonnes	0	0	34
Total hazardous waste generated directed to other disposal operation	Tonnes	0	0	0
Total non-hazardous waste generated directed to disposal	Tonnes	387	103	508
Total non-hazardous waste generated directed to incineration	Tonnes	371	103	425
Total non-hazardous waste generated directed to landfill	Tonnes	16	0	83
Total non-hazardous waste generated directed to other disposal operation	Tonnes	0	0	0

Data highlighted in [green](#) are in the scope of the independent limited assurance performed by KPMG.

## 5.2. Building an inclusive mobility ecosystem

**Our approach.** D'Ieteren is striving to make mobility more accessible to everyone, seeing mobility as a basic human need. Accordingly, the equal coexistence of different mobility solutions is regarded as indispensable to provide consumers with the best possible mobility option tailored to them.

To achieve its ambition of building an inclusive mobility ecosystem, D'Ieteren combines traditional mobility options with new means of transportation, new technologies and new behaviours.

- Not everyone needs, wants, or can afford a car. That is why D'Ieteren has expanded its offering to launch Lucien, offering bikes, cargo bikes, e-bikes and speed pedelecs for all needs and all circumstances.
- With Taxis Verts, D'Ieteren is working to implement mobility solutions that cater to the needs of people who cannot drive, ensuring equal access to transportation opportunities.
- With Poppy, D'Ieteren actively promotes the adoption of shared mobility solutions that provide on-demand transportation without the need for personal cars.
- The vehicles sold can be equipped to transport people with disabilities.
- With mBrella and Mob Box, D'Ieteren designs a corporate solution tailored to the specific needs of employees, ensuring that everyone has access to convenient, eco-friendly transportation options.
- With Volkswagen D'Ieteren Finance or Joule, financing is provided for a wide range of mobility needs.
- With MyPop, anyone can subscribe to a monthly car rental plan, which is easy to cancel.
- With Microlino, D'Ieteren offers an ideal mix between motorbike and car.
- Buying a used vehicle is also possible with MyWay, with the added benefit of a competitive maintenance service thanks to Wonderservice.

### 5.2.1. SUSTAINABLE MOBILITY SOLUTIONS

**Policies/actions.** D'Ieteren has developed a holistic mobility system, with a wide range of diversified and complementary mobility solutions that cater to a variety of needs for both individual and professional customers. To promote all of its mobility solutions, D'Ieteren is planning to develop a mobile application where consumers can access and combine all the mobility solutions on offer, and access the invoices for the solutions used in a single interface.

**Performance data.** More than 20% of our professional customers combine car utilisation with the use of one or more of our alternative mobility solutions.

INNER CITY TRAVEL WITH ANSWER TO LIMITED PARKING SPACE

**m-ero**

INTEGRATING MOBILITY SOLUTIONS

**skipr** **mbrella**  
MOBILITY MANAGEMENT

FINANCING

**Volkswagen D'leteren Finance**  
driving your mobility **JØULE**

TRAVEL FROM ONE CITY TO ANOTHER



LAST MILE INNER CITY TRAVEL

**POPPY** **JØULE** *lucien*

INNER CITY TRAVEL WITHOUT PARKING HASSLE

**TAXISVERTS**  
urban ride on time **HUSK**

### 5.2.2. ROAD CONGESTION

**Policies/actions.** Offering alternative or complementary mobility solutions to cars helps reduce their use, and consequently the number of vehicles on the road. This is particularly true in cities, where the use of bicycles is more widespread. In 2023, D'leteren sold nearly 10,000 bikes.

Car-sharing is also a strong alternative to car ownership. The activities with Poppy have registered a 170% increase in fleet utilisation in 2023.

Shared, autonomous vehicles also have the potential to make roads emptier and cities more liveable. USH, a D'leteren start-up, is Belgium's first dedicated autonomous shared mobility provider. USH provides all services to realise autonomous vehicle projects. Several projects have already been launched and new ones are under development.

### 5.2.3. CONSUMER SAFETY

**Our approach.** For D'leteren, a high level of safety for drivers, passengers and other road users is essential.

**Policies/actions.**

- To ensure safe products, D'leteren relies on the Volkswagen Group, which focuses its research and development activities on the further development of driver assistance systems, safety systems and research into the causes of accidents. The group continuously invests in measures that improve passive safety. Besides improvements to pedestrian protection, the group is developing such things as extremely strong yet lightweight body components and is continuously improving restraint systems. The group brands' safety ratings are consistently excellent.
- D'leteren also carries out road safety awareness campaigns. When faced with damaged vehicles, its Wondercar bodywork business is running a road safety education campaign aimed at young road users and their parents, using its "Wonder Robot superhero". Some 35,000 yellow vests have also been distributed to schools.
- In addition to its bikes, Lucien also sells all the equipment needed for cyclists' safety.

#### 5.2.4. CUSTOMER SATISFACTION

**Our approach.** Improving the lives of its customers, by aiming for excellence in the services provided throughout each customer journey, is one of the strategic axes on which D’leteren is working to achieve its ambition to be the natural choice for mobility in Belgium.

##### Policies/actions.

- To raise awareness among its staff, D’leteren has set up training modules to explain why the Company places the customer at the heart of its strategy and how each of them can contribute to it on a daily basis. The modules deal with customer centricity, customer satisfaction, the customer journey, customer profiles and everybody’s contribution. This training is also integrated into the onboarding programme for new employees and was intensified in 2023, particularly for people working in the after-sales service. In 2024, D’leteren will organise a customer challenge, putting every D’leteren motivated employee in the shoes of a customer and a frontline employee. Specific training for dealers, regarding hospitality, will be also set up.
- With corporate customers accounting for a large proportion of its sales, D’leteren provides them with a dedicated department, which has become their single point of contact for all products and mobility services.
- D’leteren has a Customer Care service and other call centres to answer customers’ questions. Some 2,000 questions are handled by the teams every month.
- Customers can also make use of D’leteren’s Integrity Alert Service, accessible via the Company’s commercial websites.
- D’leteren is using the Net Promoter Score (NPS) as its main KPI to measure customer satisfaction with its new vehicle sales and after-sales activities in the official network (authorised dealers for VW Group brands). Customer satisfaction is measured at several moments on the customer journey: the website visit, the offer request, the delivery of the car, maintenance, etc. Almost 100,000 surveys were completed in 2023. The results from these surveys are used in several ways. Unsatisfied customers are called back by their dealer, who investigates the issue and suggests possible solutions. Customer feedback is also analysed by the marketing team to identify any structural pain points in the customer journey and to implement projects to improve the overall customer experience. The NPS is also used to support dealers in benchmarking themselves against their peers and improving their customer service. Starting in 2024, each D’leteren business is required to track customer satisfaction and actively work on improvement.

**Performance data & 2025 targets.** 2025 NPS targets have been defined for new vehicle sales and aftersales activities in the official network. In 2023, NPSs were impacted by significant variations in delivery (sales) and appointment (after-sales) times.

Customer NPS	2022	2023	2025 Target
<b>Sales</b>			
Number of feedback collected	4,072	20,310	
Number of negative feedback collected	-	1,670	
Percentage of negative feedback follow-up	-	95%	
Number of positive feedback collected	-	13,300	
<b>NPS score</b>	<b>61.5</b>	<b>56.2</b>	<b>62.0</b>
<b>After-Sales</b>			
Number of feedback collected	64,208	94,443	
Number of negative feedback collected	-	10,136	
Percentage of negative feedback follow-up	-	97%	
Number of positive feedback collected	-	58,544	
<b>NPS score</b>	<b>51.2</b>	<b>50.5</b>	<b>54.0</b>

Data highlighted in **green** are in the scope of the independent limited assurance performed by KPMG.

Scope including: VW, Audi, CVI, Skoda, SEAT, Cupra, My way, Lucien and Wonderservice – the Luxury brands (Porsche, Lamborghini, Bentley, Bugatti) are not included.

Net Promoter Score given by customers visiting the official network for buying a new car or visiting their mechanical or bodywork aftersales workshops. For the calculation of the scores they were weighted based on forecasted sales.

#### 5.2.5. SUSTAINABLE MOBILITY THOUGHT LEADERSHIP

**Our approach.** As a market leader, D’leteren is at the forefront of mobility and the reinvention of its business.

**Policies/actions.** In view of the pressing economic, social and environmental issues, D’leteren challenges, on a bi-annual basis, its approach to mobility. Its goal is to offer mobility services that best meet the Belgian population of today and tomorrow. This large-scale qualitative market study targets both private and professional markets. In-depth online surveys were conducted with over 1,000 private consumers and about 200 B2B fleet managers in small, medium and large businesses. The results of the survey are published on <https://www.dieteren.be/en/polaris> and available to all mobility players, in order to adapt the global mobility offering as closely as possible to the needs of consumers and society at large.

5.3. Providing fair and meaningful work within its mobility ecosystem

D'leteren is dedicated to providing and endorsing respectable and meaningful work throughout its value chain **to create a positive social impact for every staff member**. This includes:

- giving everyone a voice, ensuring they are engaged, empowered, and actively involved in their workplace;
- being an inclusive business that drives opportunities for all;
- actively promoting diversity and gender equality;
- prioritizing the safety of work environments to foster the healthy development of our staff;
- offering opportunities for skill and competence development, helping employees to grow and achieve their full potential;
- upholding human rights in every aspect of D'leteren's operations, while ensuring compliance with labour standards
- actively engaging in local community initiatives to positively affect livelihoods and contribute to an inclusive economy.

D’leteren’s inability to attract and retain qualified employees can harm its operational efficiency and have an impact on competitive positioning, service quality, customer satisfaction and reputation as well as on its financial performance.

As a result:

- the HR department aims to empower and give autonomy to managers to fully support the growth of D’leteren’s high-performance organization;
- performance planning, talent development plans and talent review processes are in place to help assess individual performance, detect development needs, reduce churn and anticipate talent needs;
- Employees satisfaction surveys are conducted regularly, followed by concrete actions.

5.3.1. EMPLOYEE ENGAGEMENT

**Policies/actions.** In 2023, D'leteren conducted several surveys to assess the employee experience in its various entities and to measure employee satisfaction with the measures taken following previous surveys. The results were shared within the teams so that they could draw up specific action plans. D'leteren launched some internal focus groups to assess specific areas that the survey highlighted. Some of the output from these focus groups includes internal communication and transparency on remuneration and internal mobility policies.

In addition to measuring employee engagement, D'leteren maintains an ongoing social dialogue with employee representatives with the aim of guaranteeing social peace and the best possible working conditions. No work disruptions were recorded in 2023. With a view to the upcoming the social elections to be held in the first half of 2024, D'leteren has initiated discussions with its social partners to extend the responsibility of the local Work

Council to the vast majority of D'leteren employees, including different legal entities. This is intended to ensure greater employee mobility across entities, provide career opportunity and enhance communication and collaboration.

**Performance data & 2025 targets.** For the first time, a global survey was carried out across all entities and subsidiaries\*, enabling the Company to measure the level of employee engagement. The Employee Engagement Score of 2023 has already exceeded the 2030 target of 75%. The survey participation rate decreased due to the fact that D'leteren Mobility Company was participating in this type of survey for the first time.

	2022*	2023 (DIA)	2023*	Target 2025
Employee Engagement Score	85%	87%	83%	75%
Survey participation rate	84%	86%	61%	66%

\* Scope: D'leteren and all subsidiaries (including VDFIN). In 2022, D'leteren Mobility Company did not take part in the survey. Data highlighted in green is in the scope of the independent limited assurance performed by KPMG. Definition: engagement score is defined as the percentage of employees answering “agree” or “rather agree” across 4 statements: “I am committed to supporting my department’s vision and plans for the coming years”; “I am proud to work for my company”, “I am motivated to invest in my work to build our future”; and “My work gives me a sense of personal accomplishment”

Turnover	2022	2023
Total number of employees who have left the undertaking (incl. temporary)	318	465
Rate of employee turnover in the reporting period.	16%	20%

The number of own employees (in headcount) that left the activity during the reporting period. The leaving employee has left the activity and is not on the activity’s payroll anymore. The reported number includes all own employees leaving, specified under the following reasons of departure: own choice to leave the organization, e.g. resignation or early pension/retirement, due to end of a contract, due to dismissal, due to retirement, due to medical reasons, due to death.

5.3.2. DIVERSITY AND INCLUSION

**Our approach.** Diversity is a global priority for the business. The company’s ambition is to have an organisation that protects its people and values difference, creating an environment where people are hiring and promoting based on their ability for a role and their alignment with the company’s culture.

**Policies/actions.** As mentioned in its code of conduct and in its work rules, D’leteren prohibits any form of discrimination based on age, gender, ethnic origin, nationality, religion, etc.

To foster gender diversity within the Company, D’leteren has set up an “Accelerating Diversity” programme, including among others things:

- training programmes for everyone in the Company on the importance of diversity and unconscious bias;
- a new career section on the website and social media presence to be more attractive to female candidates;



- a leadership programme expanding in 2023 to both women and men;
- a mentoring and sponsoring pilot programme specifically designed to empower and develop women in leadership roles and to encourage the sharing of perspectives and experiences;
- a review of internal policies to ensure that they align with D&I objectives, including flexible work arrangements and family-friendly principles.

D'leteren will also strive to improve overall diversity, first determining its maturity level across its entities.

**Performance data.** Refer to *Social KPI's (Gender & age distribution)*.

**2025 targets.** As a company operating in a historically male-dominated sector, D'leteren's ambition for 2025 is to improve its gender mix by 2025, particularly in its Senior Management, which constituted 23% women in 2023. In addition, as women only constitute 31% of applicants for employee positions, D'leteren commits to 50% female CVs being submitted to its hiring managers by 2025.

	2022 (DIA)	2023 (DIA)	Target 2025
Percentage of CVs from women presented to the hiring manager for an employee position	31%	39%	50%
Percentage of women in management committees	23%	23%	25%

Data highlighted in **green** is in the scope of the independent limited assurance performed by KPMG.

Management Committees (or senior management) are defined as the leadership teams of the departments and all subsidiaries. They are made of Directors and direct reports collectively in charge of the deployment of the strategy.

### 5.3.3. HEALTH AND SAFETY

**Our approach.** Throughout its various activities, D'leteren is faced with various health and safety risks which can be distinguished in terms of the type of work performed:

- White collar: office-related work with limited occupational health and safety risks; main risks linked to burnout (covered in the wellbeing paragraph).
- Blue collar: includes workers in garages and bike shops (performing mechanical repairs (e.g. on electrical batteries) and bodywork repairs), logistics workers and workers installing solar panels (ex. GoSolar) and charging stations (EDI). These various types of work involve manual tasks, including the use of machinery and equipment and the handling of hazardous substances which can expose workers to accidents.

D'leteren is committed to reducing workplace accidents as much as possible for its employees and for suppliers working on its sites.

**Policies/actions.** D'leteren invests in high-quality safety equipment for all its employees in technical positions. It organises training courses on first aid, safe forklift use, defibrillator training, etc. The Company collaborates with risk prevention advisors and safety coordinators to further increase safety.

**Performance data.** The Company reported 76 lost time injuries (4 lost time injuries for D'leteren Automotive excl. subsidiaries) in 2023 and work accidents resulting in 623 out-of-work days (25 out-of-work days for D'leteren Automotive excl. subsidiaries). This led to a frequency rate of 20.5 and a severity rate of 0.16 (3.24 and 0.02, respectively, for D'leteren Automotive excl. subsidiaries). For more information, see *Social KPI's (Health & Safety)*.

Health & Safety	2023 (DIA)	2022*	2023
Percentage of people in its own workforce who are covered by the undertaker's health and safety management system	-	-	100%
Percentage of operational sites for which an occupational health and safety risk assessment has been carried out	-	-	72%
Number of fatalities as a result of work-related injuries and work-related ill health	-	0	0
Number of recordable work-related injuries	4	30	76
Rate of recordable work-related injuries (frequency rate)	3.24	10.7	20.5
Number of cases of recordable work-related ill health	-	0	0
Rate of cases of recordable work-related ill health	-	0	0
Number of days lost due to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health.	25	251	623
Severity rate	0.02	0.09	0.16
Percentage of its own workers covered by a health and safety management system which is based on legal requirements and/or recognised standards or guidelines	-	-	100%

\* As restated to reflect the continuous improvement in data collection and calculation (FY2022 published data, Frequency rate 9.71, Severity rate 0.08)

Data highlighted in **green** are in the scope of the independent limited assurance performed by KPMG.

### 5.3.4. WELLBEING

**Our approach.** The tri-annual Sensor Risk Assessment conducted at the end of 2021 showed a combination of high engagement and high need of recovery for employees. The main improvement issues identified were workload, appropriate use of skills, communication and proximity between employees following the covid-related lockdowns.

**Policies/actions.** The HR department has therefore increased the number of support persons whose duty it is to help people facing difficulties, organised special events for all employees and strengthened its wellbeing programme "D'leteren Employee Care". This includes programmes for burn-out prevention, stress management, physical and mental wellbeing, feedback culture, etc.

D'leteren has further pursued its vast plan for converting its offices into a great place to work. D'leteren Park will be completed by the end of 2024 and will bring together the majority of D'leteren and Volkswagen D'leteren Finance employees in a single location. D'leteren Park is much more than just offices. It is a whole new way of working that will be promoted to stimulate collaboration, curiosity, exchange and innovation. This project is

being developed in close collaboration with the staff, particularly with some of them whose role is to participate in organisational decisions and to report on these topics to their respective teams.

**Performance data.** The results of the actions taken to enhance wellbeing will be measured during the next Sensor Risk Assessment in 2024. For more information, see *Social KPI's (Wellbeing)*.

5.3.5. TALENT MANAGEMENT

**Our approach.** In a tight job market for attracting and retaining talents, D’leteren’s talent management is based on a complete mapping of its employees to identify, develop, and proactively retain staff members with a high potential and valuable characteristics and skills.

**Policies/actions.** Appraisal reviews are mandatory for all staff members to ensure that they are meeting expectations and goals, sharing aspirations, and developing personal development plans. All Managers discuss the assessment reports of their direct reports in order to calibrate their perspectives. The assessment is based on the performance and potential of the person.

To provide new opportunities for career growth and personal development and to have a larger talent pool for succession planning, in 2023 D’leteren launched its intramobility programme among all its various legal entities. This programme ensures the acquisition of new skills and experiences for employees and the transfer of knowledge and best practices across subsidiaries for higher performance, develops common culture and values, and enhances collaboration. About 30 employees benefited from this programme in 2023, which will be evaluated and continued in the coming years.

5.3.6. TRAINING AND DEVELOPMENT

**Our approach.** Providing employees with quality and targeted training is key to ensuring their professional development so that they can bring the expertise and value creation expected by the Company and consequently respond adequately to the transformations occurring in the sector.

**Policies/actions.** The D’leteren Academy plays an active role in developing skills internally and throughout the dealership network. Its transversal platform, named MyAcademy, provides easy access to a large set of learning solutions, both digital and in-person. The offering is constantly updated and structured into a diversified portfolio of training sessions linked directly to the Company’s strategy and needs, for example, inducting newcomers, sustainability training, a leadership curriculum, thus developing their transversal strategic skills and talent development programmes.

**Performance data.** D’leteren reported an average of 14.9 training hours by employee (including subsidiaries) in 2023 and makes every effort to continuously increase these levels of training over the years. For more information, see *Social KPI's (Training and skills development metrics)*.

Training and skills development metrics	2022*	2023
Percentage of employees that participated in regular performance and career reviews	-	80%
Female	-	80%
Male	-	79%
The average number of training hours per employee	16.98	14.88

\* As restated to reflect the continuous improvement in data collection and calculation (FY2022 published data: 14.5)

5.3.7. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

**Our approach.** D’leteren, as well as the Volkswagen group, recognizes the basic right of all employees to join unions and employee representations. In this context, both companies commit to safeguarding neutrality. This precludes any form of discrimination based on union activities. The companies, unions and/or employee representations engage in social dialogue. D’leteren respects the right to strike insofar as this right is exercised in accordance with the Belgian legal system.

**Policies/actions.** With a view to the upcoming social elections to be held in May 2024, D’leteren is making its dedicated HR team available to meet its obligations and ensure that the elections run efficiently.

**Performance data.** In 2023, the percentage of employees covered by a collective bargaining agreement at D’leteren amounted to 91.2%.



### 5.3.8. SECURE EMPLOYMENT

**Our approach.** One of D'leteren's strategic priorities is to guarantee quality employment within its operations. Anticipating the needs and changing behaviour of its customers, and continually adapting its business model to the challenges of the market, make it a key player in mobility in Belgium, enabling it to guarantee quality employment.

**Policies/actions.** All HR processes and policies contribute to this priority, whether in terms of training to guarantee employability, talent management to increase development opportunities, or remuneration to ensure decent conditions.

### 5.3.9. PREPARING THE FUTURE GENERATIONS

**Our approach.** D'leteren is committed to facilitating access to employment for the younger generation. In addition to fulfilling its role as a corporate citizen, the company also sees this as an opportunity to draw the attention of talented young people to technical professions in short supply.

**Policies/actions.** This commitment takes various forms. For two weeks in 2023, the D'leteren Summer Academy trained one hundred teachers from technical schools in the latest automotive technologies. Students at various stages of their schooling were also welcomed to the D'leteren Academy to discover D'leteren's technical professions and familiarise themselves with new products. In 2023, D'leteren collaborated with the KDG school in Antwerp, TADA Toekomst/Atelier d'avenir and EDUCAM to extend D'leteren training to as many students as possible.

### 5.3.10. ADDITIONAL SOCIAL DATA

Characteristics of workforce	2022	2023
<b>Number of employees (headcount)</b>	<b>2,269*</b>	<b>2,762</b>
Female	411	548
Male	1,858	2,214
<b>Number of permanent employees (headcount)</b>	<b>2,123</b>	<b>2,701</b>
Female	381	540
Male	1,742	2,161
<b>Number of temporary employees (headcount)</b>	<b>146</b>	<b>61</b>
Female	30	8
Male	116	53
<b>Number of full-time employees (headcount)</b>	<b>2,086</b>	<b>2,468</b>
Female	349	452
Male	1,737	2,016
<b>Number of part-time employees (headcount)</b>	<b>183</b>	<b>294</b>
Female	61	95
Male	122	199

\* As restated to reflect the continuous improvement in data collection and calculation (FY2022 published data:2,499)

## 5.4. Responsible business foundations

### 5.4.1. CORPORATE CULTURE AND VALUES

**Our approach.** At the heart of D'leteren's ambition to be the first-choice provider for sustainable mobility for everyone is its commitment to applying the highest ethical standards and complying with all applicable laws as well as its own in-house rules and procedures. It is firmly rooted in the company's core values and forms the basis of its corporate culture.

D'leteren's values have been defined in agreement with all its entities. They are as follows: Collaboration - Responsibility - Care - Enthusiasm - Pioneer. These values aim to stimulate transformation, distinguish itself and create strong commitment. Complementary and interconnected, they illustrate the cultural aspirations of the D'leteren ecosystem.

**Policies/actions.** The D'leteren Code of Conduct, the WayWeWork, is the Company's set of values and ethics that provides clarity on acceptable behaviour across the Company. It covers all aspects related to the way we conduct our business, the prevention of corruption and bribery, and relationships with customers, suppliers and partners. It includes the Company's statements on respect for human rights and inclusion as well as the protection of Company assets. These principles also form the basis of company policies and procedures.

It serves as a binding guideline for all employees in all brands and all businesses. D'leteren also expects third parties acting on behalf of its businesses to follow the principles set out in this guide.

Breaches of this guide may constitute professional misconduct and be penalised in accordance with labour regulations and applicable legislation. The Compliance Officer, the Head of Internal Audit, the HR department and an external health and safety service are there to provide support. The D'leteren Integrity Alert System (whistleblowing system) is also on offer to contact an external party entrusted to process such alerts, in full confidentiality. Whether or not the alert is confirmed, D'leteren ensures in each case that its internal procedures are challenged if necessary.

The Code of Conduct, together with information on the Integrity Alert System, is available on all the Company's internal and external websites. Reminders of the Code's key principles are regularly communicated, and compulsory training courses are organised. New employees are informed as soon as they join the Company. Managers have a special function as role models.

A specific Code of Conduct for Suppliers was released in 2023, to engage them more actively in achieving the highest levels of ethical, social and environmental performance. This code covers the labour standards, the protection of the environment, how to prevent corruption and bribery as well as conflicts of interests, fair competition and the protection of personal data. When contracting with D'leteren, suppliers will commit to training and raising the awareness of their teams regarding the code's principles of integrity, taking any reasonable measures to prevent, detect and remedy breaches, notifying D'leteren immediately of any identified risks or breaches, agreeing to record-based or on-the-spot

integrity checks conducted by D'leteren and informing their teams about D'leteren Integrity Alert System.

#### 5.4.2. HUMAN RIGHTS, CHILD LABOUR AND FORCED LABOUR

**Our approach.** D'leteren pays great attention to respect for Human Rights in its value chain and, through its Supplier Code of Conduct, D'leteren endorses the United Nations Universal Declaration of Human Rights.

**Policies/actions.** D'leteren expects its suppliers to comply with the laws and collective labour agreements. The principles related to working hours and minimum wages, health and safety, freedom of association and collective bargaining, forced labour and child labour for workers in the value chain, which all suppliers and subcontractors must abide by, are stated in the Supplier Code of Conduct.

The Volkswagen Group, D'leteren's main supplier, has enshrined the topic of business and human rights and its significance for the supply chain in processes and policies that apply to all its suppliers. The Volkswagen Group respects international guidelines and conventions including, in particular, the UN Universal Declaration of Human Rights, the Core Labor Standards of the International Labour Organization, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the principles of the UN Global Compact. All information can be found at

[Chapter SupplyChain\\_engl \(www.volkswagen-group.com/en/publications/corporate/supply-chain-and-human-rights-21452\).pdf](http://www.volkswagen-group.com/en/publications/corporate/supply-chain-and-human-rights-21452).pdf)

**Performance data.** No allegations against D'leteren have been taken up by the Business and Human Rights Resource Center (BHRRC). D'leteren has not been convicted in any court cases concerning Human Rights, and no complaints have been lodged against D'leteren by the OECD National Contact Point.

#### 5.4.3. BRIBERY AND CORRUPTION

**Our approach.** As stated in its Code of Conduct and the Code of Conduct for Suppliers (cf. 5.4.1.), D'leteren bases its relationships on trust and a mutual understanding that any form of corruption is unacceptable in its business activities.

**Policies/actions.** The Company has anti-corruption processes in place. The Code of Conduct describes what should be done if one happens to have knowledge about any form of corruption. The D'leteren Integrity Alert mechanism is in place to report on bribery & corruption cases as well. Internal communications on the subject are organised on a regular basis, as well as training courses for D'leteren staff members and dealership staff. New employees are systematically invited to follow this training as well.

#### Performance data

Business Conduct	2022	2023
Number of convictions for violation of anti-corruption and anti-bribery laws	0	0
Amount of fines for violation of anti-corruption and anti-bribery laws	0	0
The total number of confirmed incidents of corruption and bribery	0	0
Number of confirmed incidents in which own workers were dismissed	0	0
Number of confirmed incidents relating to contracts with business partners	0	0

#### 5.4.4. FAIR COMPETITION

**Our approach.** D'leteren believes in open competition and wants to succeed ethically and with the highest degree of integrity. Consequently, D'leteren does not enter into commercial agreements that distort, eliminate, or provide competitive advantages.

**Policies/actions.** D'leteren has implemented internal rules to which each of its employees must adhere. D'leteren has appointed two legal advisors specialising in competition law, who constantly review the various (legal) files for possible competition law issues. D'leteren promotes employee awareness of the importance of compliance with all applicable competition laws and regulations. Specific training programmes (Dawn Raid, Chinese Walls,) have been developed for concerned departments, risk functions and management as well as "on the job" training for involved employees whenever there is a competition law aspect.

**Performance data.** D'leteren and its senior management (including the senior management of its subsidiaries) have not been found to be in breach of competition laws.

#### 5.4.5. RESPONSIBLE MARKETING

**Our approach.** D'leteren and its brands are committed to sustainable, transparent, and responsible management. This applies to internal and external communications. Employees, customers, stakeholders, and the public rightfully deserve communication with respect, integrity and sincerity.

**Policies/actions.** All advertising is prepared in consultation with the legal department, which strictly follows and applies the relevant regulations. The expectations that D'leteren has for its business partners with regard to the provision of advertising and communication services for the Company and its brands are specified in the Green Book drawn up by the legal department and made available to the marketing departments. This Green Book lays down the basic rules, including those on misleading advertising, and is regularly updated. In case of new rules, the legal department sends Flash News to the various marketing departments. Training courses are also given by the legal department to the various marketing departments. On-site checks are organised (e.g. during a Brussels Motorshow), in addition to follow-up activities on the various advertising media with rectification where necessary. D'leteren cooperates with authorities, including on a proactive basis in case of ambiguities.

#### 5.4.6. TAXATION

**Our approach.** As part of the responsible management of its business, D'leteren ensures that it complies with the applicable rules in Belgium, where it operates, including the rules designed to combat tax evasion.

**Policies/actions.** D'leteren applies a tax risk management policy including:

- the presence of a well-trained tax team with a high level of expertise, who are up to date with the latest tax reforms;
- specific training programmes on tax directives and best practices as well as compulsory training on VAT rules for sales staff;
- close cooperation between the tax department and internal business auditors as well as external tax experts for specific topics.

**Performance data.** For 2023, the amount paid by D'leteren Automotive and its subsidiaries in respect of their tax obligations was €63.2m, which represents a tax rate of 36%, compared with the average Belgian tax rate of 25%.

#### 5.4.7. DATA PROTECTION (PRIVACY)

**Policies/actions.** D'leteren has a very strict policy on data management and compliance (GDPR), both for its employees and for its customers. Users' personal data are exclusively processed in accordance with the applicable Privacy Policy, which can be consulted via all our websites. A dedicated department plays an essential role internally for all developments where personal information might be used. Moreover, this is a major risk for the Company in the event of non-compliance with regulations.

**Performance data.** No data breaches were identified in 2023.

#### 5.4.8. PHILANTHROPY

**Our approach.** Community engagement is important for D'leteren as it provides an opportunity for the Company to give back to society and make a positive impact. D'leteren aims to become involved in charitable projects linked to its activities, in order to bring greater added value, through the involvement of its employees.

**Policies/actions.** Two topics are given priority in the selection of charitable projects or associations: inclusive mobility and the socio-professional inclusion of people in need. D'leteren employees are encouraged to submit the associations they are involved with. Funds are then raised through sporting activities, enabling employees to convert their mileage into euros.

**Performance data.** These Give & Gain challenges brought together around 200 employees in 2023, raising funds for the mobility projects of La Ligue Braille, Sport2be and Androïd 34. Financial support or products such as electric bikes, etc. have also been donated to causes close to our employees, such as Missing Children Europe, the Fondation Saint Luc, "Kom op tegen kanker", and the Fondation contre le cancer.

## 6. EU Taxonomy

D'leteren Automotive's major economic activity is the sale of motor vehicles which, currently, is not included in the EU Taxonomy. The Taxonomy description only includes the purchase, financing, leasing, rental, and operation of vehicles and has excluded selling as an eligible activity. This has led to a low eligibility percentage for D'leteren turnover but the company, nevertheless, believes it has an important role to play in mitigating climate change. Since D'leteren is the largest provider of new vehicles in Belgium, it plays a crucial role in the transition from fossil-fuel-driven motor vehicles to electric motor vehicles. D'leteren Automotive is also playing a role in offering a wide range of alternative mobility services.

Following the FAQ published in February 2022\*, the description of activity 3.3, which is the "Manufacture, repair, maintenance, retrofitting, repurposing, and upgrade of low-carbon transport vehicles, rolling stock and vessels" extends to all rolling stock and vessels, regardless of their low-carbon character. Hence all of D'leteren's repair, maintenance, retrofitting, repurposing, and upgrading activities (in the Wonder and Retail perimeters) can be deemed eligible.

\*Q9, FAQ (originally published in February 2022) [https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52022XC1006\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52022XC1006(01)&from=EN)

The analysis of the four new environmental objectives of the taxonomy has shown no new eligibility inside D'leteren Automotive's activities. This leads to the following list of Taxonomy activities from the climate objectives that are applicable to D'leteren's activities:

#	D'leteren economic activity	Taxonomy activity
1	Sale of bicycles & accessories (Lucien)	6.4. Operation of personal mobility devices, cycle logistics (CCM)
2	Leasing of bicycles (Joule)	6.4. Operation of personal mobility devices, cycle logistics (CCM)
3	Shared mobility services (Poppy, Taxis Verts, CarAsap)	6.5. Transport by motorbikes, passenger cars and light commercial vehicles (CCM)
4	Mechanical & Body shop repair (WonderGroup, Retail)	3.3. Manufacture of low-carbon technologies for transport (CCM)
5	Sales & installation of BEV charging stations (EDI)	7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (CCM)
6	Operation of BEV charging stations i.e. selling KWh's (EDI Network)	7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings
7	Sales & installation of PV panels and stationary batteries (GoSolar)	7.6. Installation, maintenance and repair of renewable energy technologies (CCM)
8	Mobility as a Service (Mbrella)	8.2 Data-driven solutions for GHG emissions reductions (CCM)
9	Lab Box	8.2 Data-driven solutions for GHG emissions reductions (CCM)

Among the eligible activities, mechanical and body shop repair services in the Wonder and Retail perimeters are promoting the maintenance and longevity of vehicles. D'leteren's renewable energy activities, EDI and GoSolar play a pivotal role in advancing clean energy availability for mobility. Additionally, car-sharing initiatives, such as taxi services and shared mobility solutions like Poppy, contribute to greening mobility practices. Moreover, the inclusion of bike offerings, as seen with Lucien, expands the scope of sustainable transportation options, closely aligning with the EU commitment to promoting environmentally conscious behaviours.

In total, this year's eligible turnover stayed stable from 6.6% to 6.5% of total turnover while the eligible OpEx increased from 19.2% to 24.1%.

The eligible Capex this year more than doubled from 35.2% to 78.1% of total Capex. The increase mainly results from the decision (thanks to a deeper understanding of the legislation) to include this year in eligible CapEx, not only the CapEx that can directly be associated with eligible sales of the Group's activities, but also the following Capex related to the purchase of output from Taxonomy-eligible economic activities:

- the acquisition and exercising of ownerships of buildings (that is, eligibility of all buildings, taking into account the legal or economic ownership, including the right-of-use from a lease of a building (CCM 7.7);
- the renovation of buildings (CCM 7.2) and;
- the purchase, financing, renting, leasing, and operation of all vehicles designated as category M1, N1 or L (2- and 3-wheel vehicles and quadricycles) (CCM 6.5).

D'leteren has not been able to gather all the necessary information to assess its alignment. It will work towards improving data collection in the years to come and, therefore, D'leteren will report 0% aligned turnover, CapEx and OpEx for this financial year.

The numbers reported in the tables below encompass intercompany transactions among the entities of the D'leteren Group. Such intercompany dealings are eliminated in the consolidated table (p.215).

A brief glossary of abbreviations used in the table is available on page 215.

## 6.1. Turnover

Financial year 2023	2023	Substantial Contribution Criteria								DNSH criteria ('Does Not Significantly Harm')(h)										
Economic Activities (1)	Code (a) (2)	Turnover (3)	Proportion of Turnover, 2023 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) turnover, 2022 (18)	Category enabling activity (19)	Category transitional activity (20)	
		€m	%								Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
		Y; N; N/EL (b) (c)										Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N		
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																				
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%								0.0%			
Of which Enabling		0.0	0.0%	%	%	%	%	%	%								0.0%	E		
Of which Transitional		0.0	0.0%	%													0.0%		T	
<b>A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)</b>																				
		EL; N/EL (f)																		
Manufacture of low-carbon technologies for transport		CCM 3.3	206.2	3.9%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							4.4%			
Operation of personal mobility devices, cycle logistics		CCM 6.4	35.8	0.7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.6%			
Transport by motorbikes, passenger cars and light commercial vehicles		CCM 6.5	33.3	0.6%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.5%			
Installation, maintenance and repair of charging stations for electric vehicles in buildings		CCM 7.4	16.5	0.3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.4%			
Installation, maintenance and repair of renewable energy technologies		CCM 7.6	48.4	0.9%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.7%			
Data-driven solutions for GHG emissions reductions		CCM 8.2	3.7	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.1%			
Turnover of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		343.9	6.5%	6.5%	0.0%	0.0%	0.0%	0.0%	0.0%								6.6%			
A. Turnover of Taxonomy eligible activities (A1+A2)		343.9	6.5%	6.5%	0.0%	0.0%	0.0%	0.0%	0.0%								6.6%			
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																				
Turnover of Taxonomy- non-eligible activities		4,952.9	93.5%																	
TOTAL		5,296.8	100.0%																	

## 6.2. CapEx

Financial year 2023	2023	Substantial Contribution Criteria								DNSH criteria ('Does Not Significantly Harm')(h)									
Economic Activities (1)	Code (a) (2)	CapEx (3)	Proportion of CapEx, 2023 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, 2022 (18)	Category enabling activity (19)	Category transitional activity (20)
	€m	%				Y; N; N/EL (b) (c)				Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%								0.0%		
Of which Enabling		0.0	0.0%	%	%	%	%	%	%								0.0%	E	
Of which Transitional		0.0	0.0%	%													0.0%		T
<b>A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)</b>																			
						EL; N/EL(f)													
Manufacture of low-carbon technologies for transport	CCM 3.3	9.7	6.9%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								3.8%		
Operation of personal mobility devices, cycle logistics	CCM 6.4	10.0	7.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								8.5%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	43.4	30.7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								17.9%		
Installation, maintenance and repair of charging stations for electric vehicles in buildings	CCM 7.4	0.9	0.6%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.6%		
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	1.0	0.7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								2.2%		
Data-driven solutions for GHG emissions reductions	CCM 8.2	1.5	1.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								2.2%		
Renovation of existing buildings	CCM																		
Buying real estate and exercising ownership of that real estate	7.2-7.7	44.0	31.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
CapEx of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		110.5	78.1%	78.1%	0.0%	0.0%	0.0%	0.0%	0.0%								35.2%		
<b>A. CapEx of Taxonomy eligible activities (A1+A2)</b>		110.5	78.1%	78.1%	0.0%	0.0%	0.0%	0.0%	0.0%								35.2%		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
CapEx of Taxonomy- non-eligible activities		31.0	21.9%																
<b>TOTAL</b>		141.5	100.0%																

## 6.3. OpEx

Financial year 2023	2023	Substantial Contribution Criteria								DNSH criteria ('Does Not Significantly Harm')(h)									
Economic Activities (1)	Code (a) (2)	OpEx (3)	Proportion of OpEx, 2023 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, 2022 (18)	Category enabling activity (19)	Category transitional activity (20)
		€m	%							Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%								0.0%		
Of which Enabling		0.0	0.0%	%	%	%	%	%	%								0.0%	E	
Of which Transitional		0.0	0.0%	%													0.0%		T
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																			
						EL; N/EL(f)													
Manufacture of low-carbon technologies for transport		CCM 3.3	2.1	4.4%	EL	N/EL	N/EL	N/EL	N/EL								5.6%		
Operation of personal mobility devices, cycle logistics		CCM 6.4	1.3	2.7%	EL	N/EL	N/EL	N/EL	N/EL								2.0%		
Transport by motorbikes, passenger cars and light commercial vehicles		CCM 6.5	1.2	2.5%	EL	N/EL	N/EL	N/EL	N/EL								0.8%		
Installation, maintenance and repair of charging stations for electric vehicles in buildings		CCM 7.4	0.4	0.8%	EL	N/EL	N/EL	N/EL	N/EL								1.2%		
Installation, maintenance and repair of renewable energy technologies		CCM 7.6	0.5	1.0%	EL	N/EL	N/EL	N/EL	N/EL								0.3%		
Data-driven solutions for GHG emissions reductions		CCM 8.2	6.1	12.7%	EL	N/EL	N/EL	N/EL	N/EL								9.3%		
OpEx of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		11.6	24.1%	24.1%	0.0%	0.0%	0.0%	0.0%	0.0%								19.2%		
A. OpEx of Taxonomy eligible activities (A1+A2)		11.6	24.1%	24.1%	0.0%	0.0%	0.0%	0.0%	0.0%								19.2%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomy- non-eligible activities		36.5	75.9%																
TOTAL		48.1	100.0%																