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The WayWeWork

OUR GUIDE FOR ETHICAL AND RESPONSIBLE CONDUCT | SEPTEMBER 2026

D'leteren

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We are ALL D'leteren !

What we do matters.

The way we do it makes all the difference.

Creating value for all our stakeholders goes beyond results. Value is built up day by day through the decisions we make. Because, in the long term, performance and trust go hand in hand.

The WayWeWork is not just another document.

It is a decision-making framework. It provides guidance for situations in which answers are not obvious, interests clash, pressure is mounting, or short-term objectives conflict with our commitments.

It is precisely at times like these that our choices matter most.

We operate in an environment in which expectations are constantly rising. From customers to partners, investors and society in general: everyone expects us not only to perform well, but also to be consistent, reliable and set an example. These expectations are justified. They determine our credibility and our access to the market.

Integrity is not an abstract principle. It is an operational requirement. It is a daily discipline that guides decisions that are sometimes simple, sometimes difficult, but always essential to protecting our most valuable resources: our reputation and the trust of our stakeholders.

I therefore expect three very specific things from each of you: take the time to understand this Guide so that you can make informed decisions, apply it consistently, even under pressure, and speak up as soon as any doubts arise.

We all have a shared responsibility to create an environment in which everyone can express opinions, ask questions and report issues without fear. This is an essential condition for respect. It is also a prerequisite for collective performance and risk management.

Our managers have a crucial role to play. Not by simply reiterating the rules, but by embodying them, every day, in their decisions, priorities, judgements and the way they lead their teams.

At D'leteren, integrity is not simply a claim. It is exemplified through actions.

I'm counting on each of you to play your part.

Thank you for your commitment.

Denis Gorteman
CEO D'leteren



The WayWeWork in practice

The WayWeWork is D'leteren's reference document for ethical and responsible conduct. It sets out D'leteren's behavioural requirements and instructions to guide employees in their day-to-day work.

The WayWeWork is designed to help everyone understand the relevant standards and expected behaviour at D'leteren. It provides a common benchmark to guide ethical and legally compliant behaviour in all our activities. It also contains practical examples illustrating how important ethical issues must be addressed.

The WayWeWork is not intended to answer every question or cover all possible scenarios. It provides general guidance but does not replace common sense or professional judgement. If a situation is unclear, it is still necessary to seek advice.

The WayWeWork applies to all employees of D'leteren Automotive and its subsidiaries. D'leteren also expects third parties acting on its behalf to follow the principles set out in this Guide.

EMPLOYEE RESPONSIBILITY

Every member of staff is responsible for behaving in a professional and ethical manner, in accordance with laws and regulations.

EVERYONE MUST THEREFORE:

- know and understand the topics covered in The WayWeWork;
- apply these principles to decisions and day-to-day activities;
- complete the required training within the specified timeframes;
- seek advice from the appropriate contact persons if in doubt;
- be familiar with the different reporting channels, in particular the Integrity Alert system;
- report any non-compliant or risk situation without delay.

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MANAGERIAL RESPONSIBILITY

All managers are responsible for establishing a clear and rigorous framework for ethical behaviour and ensuring its effective application in day-to-day activities.

We expect D'leteren's managers to exemplify these principles, anticipate and manage risks, and act swiftly in the event of any problems.

They also have a key role to play in creating an open working environment in which everyone can speak their mind without fear.

AS A MANAGER, YOU MUST :

- have a thorough understanding of the principles of The WayWeWork;
- communicate them clearly to your teams and third parties;
- ensure that staff are trained and understand what is expected of them;
- incorporate these principles in all your decisions and those of your team;
- identify, evaluate and address compliance risks;
- ensure that processes are understood and followed;
- actively promote the Integrity Alert system;
- report high-risk situations or incidents;
- implement the necessary corrective actions.

IMPORTANT QUESTIONS TO MAKE THE RIGHT DECISION

- Does this decision comply with the law and our ethical principles?
- Is it consistent with D'leteren's commitments and long-term interests?
- Could it have a negative impact on our reputation or that of our partners?
- Does it create a conflict of interest, whether real or perceived?
- Would I feel comfortable if this decision were made public?
- Have I approached the right people to confirm my analysis?



Breaches of this guide can constitute professional misconduct and may result in disciplinary measures in accordance with applicable rules and regulations.

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If you find yourself in a risk situation, have any doubts or notice any behaviour that is out of line, it is your responsibility to speak up.

You can get in touch with the appropriate contact persons or use the Integrity Alert system.

Reporting an incident helps to protect the company, its staff and its environment. It is an act of responsibility.

Please report any cause for concern, including situations that may require investigation. D'leteren takes full responsibility for launching these investigations, if necessary with the support of an approved external partner, working in collaboration with the HR, Legal and Internal Audit teams in accordance with legal requirements.

Confidentiality and respect are guaranteed. No person acting in good faith will be subject to reprisals. Any attempt at retaliation will be punished.

THE PEOPLE HAVING THE FOLLOWING FUNCTIONS ARE AT YOUR DISPOSAL

- Your manager
- Your department management
- Your entity's HR manager
- The Head of Internal Audit
- The Head of Legal
- The Social Relations and Legal Manager
- The Chief Human Resources Officer
- Your entity's health and safety adviser
- D'leteren's Social & Ability Manager
- Internal trusted individuals
- The CEO of D'leteren Group
- The Managing Director of D'leteren Group

In addition, all staff members have access to an external prevention service that can be used in complete confidence. This service is available on the <https://www.seed-connect.be> platform and allows easy access to an external adviser for any queries relating to well-being at work or sensitive situations.

For staff at the following entities, D'leteren Automotive, VDFin, D'leteren Mobility Company, Wonder and Auralis, this service is operated by Attentia, an external partner specialising in prevention and psychosocial support. The company can be contacted by email (wellbeing@attentia.be) or by telephone (02 738 75 31).



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D'IETEREN'S INTEGRITY ALERT SYSTEM

If you are not comfortable contacting any of the functions above, you can report the problem, anonymously or not, through D'Ieteren's Integrity Alert system.

This system is available on dieteren.be and on the intranets and websites of each of our businesses. The system is at your disposal and it is also at the disposal of our business partners, customers and other stakeholders.

HOW TO SUBMIT A REPORT?

1. Go to the digital platform that enables you to report any breach, anonymously or not, in a secure environment:
<https://whistleblowersoftware.com/secure/dieteren>. The platform is managed by an independent firm.
2. Detail the issue: what, where, when, how, who?
3. Specify whether you wish to remain anonymous or not.
4. Be available and cooperate during the report processing or investigation period.

HOW ARE YOU PROTECTED?

- Absolute confidentiality (external law firm)
- Specialised support and follow-up
- Protection of whistleblowers by law and by D'Ieteren

Please refer to the Whistleblowing Policy available on the intranets or via this QR code for more details and to find out about the entire procedure.



Breaches include, in particular:

- conflicts of interest, corruption;
- fraud or misappropriation of money, dishonesty, falsification, manipulation;
- unfair competition;
- immoral, disrespectful or discriminatory behaviour;
- endangerment of physical or IT security or of human health;
- breach of privacy or personal data;
- pollution that does not comply with standards;
- breach of the company's tangible or intangible property or trade secrets;
- inappropriate or unauthorised gifts or entertainment with our partners;
- etc.

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COMPLIANCE WITH LAWS AND REGULATIONS. COMPLIANCE WITH INTERNAL RULES AND POLICIES.

At D'leteren, we ensure strict compliance with the laws and regulations applicable to our business activities.

We also adhere to recognised international standards, including the OECD Guidelines, the Universal Declaration of Human Rights and the Ten Principles of the United Nations Global Compact, in order to ensure responsible and consistent practices across all our activities.

Our internal rules and policies translate these principles into concrete actions in our day-to-day work.

D'leteren also carries out regular audits to monitor its compliance with laws, regulations and internal policies, and makes sure that corrective actions are followed up effectively.

WHAT SHOULD I DO?

- Be familiar with the laws, regulations and constraints relating to or affecting my role or responsibilities.
- Comply with the rules, guidelines and internal policies put in place by D'leteren.
- Remain vigilant and use my judgement in high-risk situations.
- If in doubt, seek advice from the Legal Department.
- Follow the instructions given without deviation and refrain from any potentially unlawful or non-compliant action.

MANAGERS MUST

- make sure the relevant rules are known, understood and applied;
- ensure that teams receive the necessary information and training;
- encourage staff to raise issues and consult the Legal Department.



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COMPLIANCE WITH COMPETITION LAW

At D'leteren, we operate in accordance with the principles of fair and open competition.

Any form of anti-competitive practice is prohibited: this would expose the company to severe penalties and damage its reputation.

WHAT SHOULD I DO?

- Be aware of and comply with the relevant competition rules for my work.
- Never share sensitive information with competitors (including: current or future prices; discounts, bonuses or commercial terms; costs, margins or profitability targets; sales volumes; customer data; sales or marketing strategies; and future development plans).
- Ensure that any information shared with third parties complies with the applicable rules and, where permitted, is sufficiently aggregated, anonymised or subject to appropriate safeguards so as not to influence the competitive behaviour of the companies concerned.
- Never request, obtain, accept or use information acquired in breach of a duty of confidentiality, a contractual obligation or competition rules.
- Never use confidential information obtained from a former employer, competitor, supplier or business partner.
- Reject any agreement or practice designed to distort competition (including: price-fixing; allocation of customers, territories or markets; restriction of production or sales; coordination of responses to tenders; and boycotting of customers, suppliers or competitors).
- Be vigilant at industry events and activities organised by professional associations.
- Comply with the relevant internal procedures when exchanging data within the distribution network, with independent dealers, importers, business partners or other D'leteren entities.
- Withdraw immediately from any discussion involving topics that could constitute a breach of competition law. Ensure that your departure and disagreement are clearly stated and documented where possible.
- Always consult the Legal Department before:
 - taking part in any initiative involving exchanges of sensitive information,
 - entering into a cooperation agreement with a competitor,
 - setting up a system for exchanges of market data,
 - launching a commercial programme that could potentially impact prices or the network's commercial terms.

If in doubt or in a high-risk situation:

- bring the discussion to an immediate halt,
- refuse to take part in the exchange in question,
- leave the meeting or event, if necessary,
- contact the Legal Department without delay.

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MANAGERS MUST

- promote a culture of fair competition and lead by example;
- make sure that they and their teams are trained and understand high-risk situations;
- ensure that commercial practices comply with competition rules;
- encourage staff to consult the Legal Department if in doubt;
- involve the Legal Department at a sufficiently early stage in any project, partnership, information exchange or discussion that could raise a competition law issue;
- take appropriate action immediately if a risk or potential breach is identified, and cooperate fully with the Legal Department while the situation is being investigated.

Examples

Can we give a dealer details of other dealers' sales figures?

No.

Sales figures are commercially sensitive information that cannot be shared externally unless, in specific circumstances, they are anonymised at national level.

Can an employee of a dealer owned by D'leteren Mobility Company contact a competitor and agree on sales prices and the allocation of certain customers and markets?

No.

Selling or purchasing price fixing and sharing customers and markets between competitors/LMAs constitute serious breaches of competition law.

[Where can I find further information?](#)

The Legal Department is available to answer any questions.



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WHAT SHOULD I DO?

- Ensure that all customer communications and presentations are honest, accurate and not misleading.
- Provide clear, comprehensive and understandable information to allow informed decisions and safe use of products and services.
- Ensure the safety and quality of products and services, and report any risks or incidents immediately.
- Honour commitments made to customers.
- Protect customers' personal data and confidential information in accordance with the applicable laws (including the GDPR).
- Handle customer complaints and feedback promptly, fairly and transparently.
- Adopt responsible sales and marketing practices that respect consumers.

A RELATIONSHIP OF TRUST WITH CUSTOMERS

D'leteren is committed to providing safe, high-quality products and services that meet the expectations of customers and society.

Our customers' trust relies on integrity, transparency and honouring of our commitments.

MANAGERS MUST

- ensure that customers are treated equally and prevent conflicts of interest;
- make sure that marketing activities meet high ethical, social and cultural standards;
- guarantee compliance with laws and regulations, particularly with regard to consumer protection and public tenders which are subject to complex procurement rules and procedures;
- ensure that teams understand and apply the rules governing public procurement, while strictly adhering to the principles of fairness, transparency and freedom from corruption;
- report concerns through the appropriate channels.

Customer Care provides a key contact point to ensure that customer enquiries, complaints and returns are handled in a professional, fair and transparent manner.

Customers can also use the Integrity Alert system available on www.dieteren.be to report any situation that breaches our ethical principles.

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RESPONSIBLE SOURCING AND BUSINESS PARTNERSHIPS

We expect our business partners to apply ethical and operational standards that are in line with our own, and to implement these throughout their supply chains.

D'leteren's Sourcing & Procurement Policy sets out clear and binding rules for all third parties. Third-party due diligence is essential for the selection and assessment of suppliers and forms part of the supplier risk management framework.

Failure to comply with these requirements exposes D'leteren to legal and reputational risks, but could also result in breaches of workers' rights within our value chain.

Each of us, in our dealings with external partners, has the responsibility to ensure that these requirements are understood, followed and implemented.

WHAT SHOULD I DO?

- Comply with the processes defined by Sourcing & Procurement, in particular by using the tools and platforms in place for all purchase requests and supplier interactions.
- Contribute to supplier evaluations on the basis of objective criteria (quality, performance, suitability for requirements, sustainability), while adhering to defined roles.
- Treat all suppliers fairly, transparently and without favouritism.
- Identify, avoid and immediately report any actual or perceived conflicts of interest.
- Report any situation that poses a risk, is non-compliant or breaches the rules using the appropriate channels, including the Integrity Alert system.

MANAGERS MUST

- ensure that the Sourcing & Procurement department plays a central role in tenders, supplier selection and supplier management;
- strictly enforce procurement processes and the use of official tools in order to ensure the traceability and compliance of purchases, and prevent commitments being made outside the defined frameworks;
- support ESG assessments of suppliers and ensure their compliance with the Supplier Code of Conduct.

Where can I find further information?

Detailed information on the tools, processes and contacts within the Sourcing & Procurement team can be found on the company's internal channels. If you do not have access to these resources, please request the necessary information from your manager or contact the Sourcing & Procurement team at procurement@dieteren.be.



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ANTI-MONEY LAUNDERING

Money laundering involves the concealment, or facilitating the concealment, of the origin of funds or assets derived from unlawful activities, such as fraud, corruption, drug trafficking, theft, swindling or tax evasion.

Even if there is no fraudulent intent, any direct or indirect involvement in money laundering may expose D'leteren and its employees to serious consequences, including civil, administrative and criminal penalties.

Compliance with anti-money laundering regulations, particularly those governing cash payments, helps to protect our reputation, safeguard the integrity of our business and reduce legal risks for the company and its employees.

WHAT SHOULD I DO?

- Never take part in any scheme designed to conceal the source of funds or to circumvent the rules governing payments and financial transparency.
- Comply strictly with the legal limit on cash payments, which must not exceed €3,000 per transaction or per series of transactions that appear to be linked.
- Never artificially split a transaction or agree to split an invoice in order to circumvent this limit.
- Look out for any unusual or suspicious circumstances, particularly in relation to atypical transactions, inconsistent behaviour, unusual requests for reimbursement, or where the source of funds or a vehicle appears uncertain.
- Check and clarify any situation that could potentially pose a risk before proceeding with a transaction.
- Cooperate fully with the relevant departments (Internal Audit, Legal, Finance) and the authorities in the event of an audit or any request for information.
- Report any suspicious situation or risk immediately using the appropriate channels, including the Integrity Alert system.

MANAGERS MUST

- ensure that their teams fully understand and apply anti-money laundering rules;
- ensure that appropriate controls are in place, particularly for activities, transactions or partners representing an increased risk;
- support training and awareness-raising initiatives relating to risks of money laundering, financial fraud and regulatory circumvention;
- encourage vigilance and create an environment in which staff can raise concerns without fear of reprisals;
- escalate any sensitive, complex or potentially suspicious situation to the relevant departments (Internal Audit, Legal, Finance) and ensure it is dealt with appropriately.

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**A customer wants to pay for his or her vehicle partly in cash.
Is this allowed?**

This is possible,

provided that the total cash payment for the transaction does
not exceed €3,000.

**A customer has already paid €2,500 in cash as a deposit and
wishes to pay a further €2,500 in cash upon delivery of the vehicle.
Is this allowed?**

No.

This request must be declined, as the €3,000 limit applies to the
transaction as a whole.

**A customer has asked for a €4,500 invoice to be split into several
invoices in order to pay the full amount in cash.
Can I accept this?**

No.

This request must be declined as it is forbidden to artificially split a
transaction to circumvent the applicable rules.

**When taking delivery of a vehicle, I notice that the vehicle presented
does not belong to the customer or that its origin appears to be
questionable. Should I report it?**

Yes.

You must clarify the situation immediately before proceeding with
the transaction.

**A customer buys and quickly resells several vehicles in succession,
with payments coming from different bank accounts in several
countries. Should I be concerned?**

Yes.

This situation is a warning sign and requires further investigation.

**Following the cancellation of a sale, a customer asks for the refund
to be paid into a third party's bank account rather than the account
used for the original payment. Is this allowed?**

No.

In principle, the refund must be paid into the original account in
order to avoid any risk of money laundering or fraud.



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ANTI-CORRUPTION – GIFTS

Corruption involves offering, promising, giving, requesting or accepting an undue advantage in order to influence a decision or professional conduct. In particular, it may take the form of bribes, illegal commissions or inappropriate gifts and invitations.

Any involvement, whether direct or indirect, exposes D'leteren and its employees to significant legal risks and serious damage to our reputation.

D'leteren applies a zero-tolerance policy: no undue advantage can be offered or accepted with a view to influencing a decision.

WHAT SHOULD I DO?

- Do not accept or offer, either directly or through a third party, any gifts, invitations or hospitality that could influence a decision or be perceived as inappropriate, excessive or lacking in transparency.
- Ensure that any gift or invitation remains occasional, proportionate and justified by a legitimate business purpose.
- Refuse to accept any form of cash or cash equivalents (cheques or gift cards).
- Report any situation in which there is uncertainty, pressure or a potential conflict of interest.

MANAGERS MUST

- lead by example and promote a culture of integrity and zero tolerance of corruption;
- make sure that teams fully understand and comply with the rules, particularly with regard to gifts and invitations;
- ensure that decisions are taken on the basis of objective criteria and without undue influence;
- supervise risk situations and consult the relevant departments (Audit, Legal) if in doubt.

The usual end-of-year gifts or favours of little value – i.e. less than €75 incl. VAT – received as part of reasonable business practices, as well as invitations for occasional modest meals are acceptable in principle provided that they do not influence your independence or the defence of D'leteren's interests.

If you accept a gift or favour worth more than €75 incl. VAT, you must report it to your manager and inform him or her of the value of the gift or favour.

Suggestion: pool and share all gifts received within your department. In addition to being transparent on the subject, these are pleasant moments of exchange between colleagues.

Examples

A supplier who submits a bid in a call for tenders issued by the Sourcing & Procurement Department and with whom I would be working if they were selected, wishes to invite me to a restaurant. Can I accept?

No.

It is important to maintain a professional distance during the tendering process. Accepting an invitation to a restaurant from a supplier submitting a tender can be seen as an attempt to influence the choice of bidder. Therefore, it is best to decline this invitation.

A supplier gave me an iPad as a gift and personalised it with my initials. I know I shouldn't accept it, but I wouldn't want to offend the supplier, and since the device is already engraved, can I keep it?

No.

Return the item politely to the supplier and explain D'leteren's policy by referring to The WayWeWork guide.

As part of my role, I have regular dealings with a caterer. Can I call on this caterer for my child's wedding?

No.

It is likely that the supplier will want to give you special conditions because D'leteren is its customer and you will be obligated to him or her in this case. But even if you pay the market price and get no personal gain from it, the perception of your independence of this supplier would suffer. This perception is also essential.



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CONFLICTS OF INTEREST

A conflict of interest arises when a personal interest conflicts, or may be perceived as conflicting, with D'leteren's interests. It may arise from personal, social or financial activities, including those of friends or family members.

Such situations may compromise the objectivity of decisions, create a perception of dependence or undermine our partners' trust.

Identifying, avoiding and managing conflicts of interest appropriately helps to ensure impartial decision-making and protects both the company and each and every one of us.

WHAT SHOULD I DO?

- Exercise sound judgement and act with integrity in all situations that could affect the objectivity of decisions.
- Notify your line manager immediately, in writing, of any relationship or situation that could give rise to a conflict of interest (particularly with a customer, supplier or competitor).
- Refrain from taking part in any decision or discussion in which there is a conflict of interest.
- Do not use the company's assets, information or position for your own personal gain or that of a third party.
- Do not derive any personal benefit from business or investment opportunities relating to D'leteren, other than those permitted.
- Remain vigilant in risk situations, in particular:
 - favouring a supplier on the basis of personal connections;
 - accepting a benefit in exchange for preferential treatment;
 - influencing a decision in favour of a friend or relative;
 - conducting business on a private basis with D'leteren's partners.

MANAGERS MUST

- lead by example and promote a culture of transparency and integrity;
- ensure that decisions are taken on the basis of objective and documented criteria;
- encourage employees to report sensitive situations without fear.

If you are a director and are faced with a potential conflict of interest situation, you are required to inform the Legal Department prior to taking any decision so that it can ensure compliance with the procedure provided for in the Companies and Associations Code.

Example

My brother has a stake in a small company that is one of D'leteren's suppliers. We do not talk business and I have never been involved in any decision regarding the use of this provider. Do I have to report the existence of this relationship?

Yes.

Your relationship could create the perception of a conflict of interest. You must inform your manager of the existence of this relationship. Even if there is no direct conflict, the perception of a conflict can still cause problems for you and D'leteren.



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INTEGRITY OF FINANCIAL INFORMATION AND PREVENTION OF FRAUD

Reliable and comprehensive financial information is essential to manage our operations, make informed decisions and maintain our partners' trust.

Any irregularity, inaccuracy or falsification could have serious legal, financial and reputational consequences for D'leteren and the employees concerned.

Ensuring the accuracy of information and preventing fraud is a collective responsibility at all levels of the company.

WHAT SHOULD I DO?

- Record operations and transactions accurately, in accordance with the rules and as and when they occur.
- Never falsify, conceal or manipulate information, documents or records.
- Reject any practice designed to artificially alter results or circumvent rules.
- Never manipulate or distort financial information in order to meet a performance target.
- Remain vigilant with regard to risk situations (inaccurate expense claims, unauthorised transactions, inappropriate use of assets, etc.).
- Report any irregularities, questionable practices or suspected fraud immediately using the appropriate channels, including the Integrity Alert system.

MANAGERS MUST

- ensure that the information produced by their teams is reliable, complete and properly documented;
- put in place and maintain appropriate checks to prevent and detect errors and fraud;
- ensure compliance with accounting rules and internal processes, particularly with regard to the recognition of costs and revenue;
- take any suspicious situation seriously and ensure it is dealt with promptly and appropriately.

Example

I am responsible for monitoring the budget in my department. A colleague approached me recently to inform me of a cost overrun on a project and expressed a wish to carry over some of these costs to the next fiscal year when the budget is renewed. The costs, in the end, will be accounted for correctly. So can I simply carry these costs over to the next fiscal year?

No.

You must never falsify the dates at which costs are incurred. Expenses must always be accounted for in a timely, accurate manner and in the fiscal year in which they are incurred. Inaccurate or falsified accounting can have serious consequences for both the company and the employee concerned.



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PARALLEL WORK AND OTHER ACTIVITIES

D'leteren respects its employees' freedom to engage in activities outside their working lives.

However, these activities must not interfere with professional responsibilities, create any conflict of interest or harm D'leteren's interests or reputation.

WHAT SHOULD I DO?

- Carry out any external activities in accordance with my professional obligations; make sure they do not affect the quality of my work or my availability and do not involve the disclosure of confidential information.
- Do not engage in any activity that could constitute unfair competition with D'leteren.
- Do not use the company's resources, information or property without prior written authorisation.
- Do not use any equipment showing the Volkswagen Group logo in connection with external activities to avoid any confusion or damage to the Group's image.
- Inform my HR Business Partner, in advance and in writing, of any additional paid work.

MANAGERS MUST

- encourage transparency and the declaration of external activities;
- ensure that the external activities declared are compatible with the duties performed and do not give rise to any conflict of interest;
- refuse or supervise any external activity that represents a risk for the company; consult the relevant departments (HR, Legal) in the event of doubt or any sensitive situation.



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ENVIRONMENTAL PROTECTION

As a leading player in Belgium, D'leteren is playing a key role in the transition to carbon-free mobility. This ambition reflects our mission to build seamless and sustainable mobility for all.

With Project Zero, D'leteren has committed to achieving Net Zero by 2050, with an interim target of a 42% reduction in CO₂ emissions across its entire value chain by 2030. These targets, covering direct and indirect emissions (Scope 1, 2 and Scope 3-cat. 11), have been validated by the Science-Based Targets initiative (SBTi).

Achieving these objectives requires specific actions across all our activities.

WHAT SHOULD I DO?

- Consider environmental impacts in decisions and assessments.
- Play an active role in reducing emissions and ensuring the responsible use of resources.
- Identify and suggest solutions to improve environmental performance.
- Act in a manner consistent with D'leteren's climate commitments.

MANAGERS MUST

- incorporate climate targets in their activities and action plans;
- integrate transition issues in operational decision-making;
- encourage teams to take practical action and suggest improvements;
- monitor progress and make sure it is aligned with D'leteren's commitments.

Example

**In my area of work, one operational option helps to reduce costs but increases emissions.
Can I always give it priority?**

No.

Decisions must consider environmental impacts as well as economic criteria.
This will require trade-offs, in line with D'leteren's business objectives and emissions reduction targets.



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NON-FUNDING OF POLITICAL ACTIVITIES

D'leteren operates independently and is politically neutral. We do not fund any political activities, either directly or indirectly. Any contribution, in whatever form (money, goods, services, provision of resources or time, etc.), is prohibited if it benefits a political party, candidate, elected representative or political organisation.

D'leteren respects each individual's right to take part in political activities in a personal capacity. However, these commitments must remain strictly separate from professional activities.

WHAT SHOULD I DO?

- Engage in any political activity on a strictly personal basis, in my own name, in my own time and at my own expense.
- Take care not to create any confusion between my personal views and those of D'leteren.
- Do not use the company's resources, name, image or facilities for political purposes.
- Refrain from any action that could be perceived as an attempt to unduly influence a public decision.
- Ensure that all interactions with public or external parties comply with internal rules and the applicable laws.
- Report any situation that could give rise to a conflict of interest or question the company's impartiality.
- Obtain prior approval before representing D'leteren in an advisory group or public authority body.

COMMITMENTS WITHIN THE COMMUNITY

D'leteren actively contributes to society by supporting charitable initiatives, in particular through patronage and sponsorship. These commitments make a tangible contribution to a more inclusive economy and strengthen our local presence.

We ensure that every contribution is meaningful and carried out with complete transparency. They reflect our commitment to acting responsibly and having a positive impact while adhering to the established eligibility, selection and exclusion criteria.

WHAT SHOULD I DO?

- Make sure that any initiative supported is in line with D'leteren's priorities and policies.
- Ensure the transparency and legitimacy of any donation or sponsorship.
- Avoid any situation involving a conflict of interest or favouritism, whether real or perceived.
- Never use a donation or sponsorship to influence a decision or gain an advantage.
- Ask for advice if in doubt.



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RESPECT, DIGNITY AND FAIR TREATMENT

At D'leteren, we respect human rights and are committed to providing an inclusive working environment based on respect, fairness and mutual trust. Each individual should be able to contribute, develop and succeed on the basis of their skills and merit.

We promote equal opportunities at every stage of our employees' careers and view the diversity of backgrounds, experience and perspectives as an asset to the company.

We promote an environment that respects fundamental rights, including freedom of association, collective bargaining and fair working conditions, and we follow a zero-tolerance policy towards forced labour, human trafficking and child labour.

We also have a zero-tolerance policy towards any form of harassment, discrimination, bullying or offensive behaviour, whether direct or indirect. Transparent, confidential and secure channels are in place to allow anyone to report any concerns or instances of unfair treatment without fear of reprisals.

We respect our employees' cultural and religious diversity within a framework compatible with security requirements. The wearing of religious or belief-based symbols is permitted, provided that this does not compromise either safety or the identification of individuals, and subject to any restrictions relating to certain activities or external collaborations. Symbols indicating affiliation with a political movement are not permitted in the workplace.

WHAT SHOULD I DO?

- Treat everyone with respect, fairness and impartiality.
- Behave in a professional, respectful and constructive manner in all interactions.
- Be mindful of the impact of my words and actions, even when I disagree.
- Reject all forms of discrimination, in particular on the grounds of age, gender, origin, nationality, religion, health, disability, family circumstances, sexual orientation, political or philosophical beliefs, trade union membership or any other protected characteristic.
- Reject and challenge any behaviour that is offensive, intimidating, violent, humiliating or inappropriate.
- Foster an environment in which everyone can express opinions and contribute.
- Look out for situations that could infringe human rights, including in our dealings with external partners.
- Use internal investigations to identify potential problems and help to resolve them.
- Wear appropriate, smart and professional attire suitable for the workplace and compliant with health and safety requirements.



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MANAGERS MUST

- lead by example and promote a culture of respect, fairness and dignity;
- ensure a working environment based on active listening, professionalism and inclusion;
- make sure that decisions (on recruitment, appraisal, development and work organisation) are based on objective and fair criteria;
- be alert to risk situations (tensions, inappropriate behaviour, discrimination, external partners) and take action promptly in the event of any problem;
- encourage open dialogue and make sure that everyone can voice their concerns without fear;
- deal with any reported situation in a serious, confidential and appropriate manner.

See something? Speak Up.

If you witness inappropriate behaviour or hear inappropriate comments, you have more options than you might think.

FOR EXAMPLE, YOU CAN:

- speak out: state calmly, either at the time or shortly afterwards, that this behaviour or comment is unacceptable;
- defuse: switch the dynamic to reduce tension, for example by changing the subject or asking an unrelated question, and then consider one of the other options to make sure this behaviour is not tolerated;
- involve other people: you're not on your own. Seek help by speaking to your manager, your HRBP, someone you trust, Attentia or use the Integrity Alert system;
- stay present: if you are unable to intervene at that moment, remain physically present and then reach out to the person concerned, offer your support and discuss together whether there is anything that can be done.

THE MAIN THING IS NOT TO LOOK AWAY.

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Examples

**I have noticed that an external partner does not appear to be complying with appropriate working conditions.
Can I assume that this is not my responsibility?**

No.

Any situation that could potentially breach human rights must be reported and investigated.

**A colleague regularly raises their voice, disparages other people's work or takes a humiliating tone.
Is this acceptable in high-pressure situations?**

No.

Pressure or urgency never justify disrespectful behaviour.

**At meetings, certain people are consistently interrupted or ignored.
Should this issue be taken seriously?**

Yes.

Respect is also expressed through the quality of discussions, active listening and allowing everyone an opportunity to contribute.

**An employee is excluded from a project or an opportunity for reasons unrelated to their skills.
Is this acceptable?**

No.

Decisions must be based on objective, professional and fair criteria.



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HEALTH, WELL-BEING AND SAFETY

Health, well-being and safety are priorities at D'leteren. Through our everyday behaviour, each of us plays our part in creating a safe, healthy and respectful working environment. We also strive to maintain a sustainable work-life balance.

Well-being at work is central to our long-term performance. It encourages commitment, motivation and staff retention, while reducing risks of absenteeism, burnout and accidents.

To achieve this, we are implementing a range of practical measures: prevention programmes (for stress, burnout and mental health), support services, training to help managers identify psychosocial risks and regular monitoring of the workplace atmosphere.

We all have a part to play. We expect each individual to comply with rules on absences and to communicate transparently to help the team run smoothly.

WHAT SHOULD I DO?

- Work and behave in a safe and health-conscious manner, complying with the regulations, procedures and training relevant to my role.
- Only carry out tasks for which I am trained, competent, medically fit and sufficiently alert.
- Be familiar with emergency procedures and report any incident, dangerous situation, injury or unhealthy condition immediately, even if it was narrowly avoided.
- Maintain a work-life balance.
- Be alert to signs of stress, fatigue, isolation or unhappiness, both in myself and others.
- Report any difficulties (health, workload, personal circumstances) before they lead to repeated or prolonged absences.
- Provide prompt notification of any absence or lateness according to the applicable rules and minimise the impact of my absences on the team's organisation as far as possible.
- Never work while under the influence of substances that could compromise safety (alcohol, drugs or inappropriate use of medication).
- Observe the Highway Code and drive responsibly when travelling or test-driving vehicles.

MANAGERS MUST

- ensure that teams have the required information, equipment and conditions to work safely;
- make sure that rules are understood, applied and observed over the long term;
- ensure that any changes in work processes or tools do not give rise to new or increased risks in the workplace;
- ensure that workloads are realistic and manageable, and prevent situations of excessive workload or recurrent absenteeism;
- guarantee a responsible environment at internal and external events: do not serve spirits and ensure that wine and beer are consumed in moderation;
- take any risk situation seriously, act swiftly to rectify it and encourage the reporting of incidents and near-misses.



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**A task needs to be carried out quickly, but this involves bypassing a safety instruction.
Can I do this as an exception?**

No.

No operational requirement justifies compromising health or safety.

**I receive work-related messages late in the evening or at the weekend.
Do I need to reply straight away?**

No.

Respecting the right to disconnect is part of
well-being at work.

Where can I find further information?

The Health & Safety teams are available to help. All the necessary information can also be found on the HR portal in the section [Safety](#) on the intranet.

If you do not have access to these resources, ask your manager or your organisation's health and safety department for the necessary information.



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PERSONAL DATA

As part of our business activities, we process personal data relating, in particular, to employees, customers, partners and suppliers.

Protection of this data is essential to maintain trust, respect data subjects' rights and ensure compliance with the applicable rules. Any misuse, unauthorised disclosure or loss of data could have significant consequences for D'leteren.

WHAT SHOULD I DO?

- Comply with the applicable internal data protection rules and procedures; details are available on the [Privacy Office Portal](#).
- Collect and use personal data only to the extent necessary to achieve the intended purpose.
- Ensure transparency with individuals with regard to how their data is used.
- Ensure that any sharing, transfer, or use of personal data is authorized and complies with applicable rules.
- Report any loss, error, leak or unauthorised use of data immediately to the DPO or the Privacy Office.

MANAGERS MUST

- ensure that teams understand the relevant rules and apply them in their day-to-day work;
- restrict access to data solely to those persons who require it for the performance of their role;
- take any incident or risk relating to personal data seriously and ensure it is dealt with promptly;
- encourage teams to seek advice from the Privacy Office if in doubt before any use or sharing of data.

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Example

**I have accidentally sent a document containing personal data to the wrong recipient.
What should I do?**

Any errors or potential data breaches must be reported immediately to privacyoffice@dieteren.be.

**My sister is starting up her own business and asked me to provide her with my colleagues' contact details to add to her network of business contacts. I think they might be interested in what she is selling.
Can I give her their names and email addresses?**

No.

You cannot provide this information. Your sister will have to find another way to build up her customer database. The names and email addresses of employees are personal data and can only be processed by D'leteren for legitimate business purposes.

[Where can I find further information?](#)

D'leteren's Privacy Office is available to answer any questions by email at privacyoffice@dieteren.be.



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We expect employees to use D'leteren's property responsibly.

This property includes not only tangible items such as the premises, merchandise, supplies, vehicles, equipment, furniture, IT systems, etc., but also intangible elements such as working time, D'leteren's image and its brands, ideas, creations and concepts. Asset protection also includes lists of customers and suppliers and other market data.

All rights to the goods and information generated or acquired in the course of the employee's work for the Company remain the exclusive property of the Company, unless provided otherwise by law.



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TECHNOLOGY AND INFORMATION

Access to our systems and information enables everyone to work efficiently.

Inappropriate or negligent use could compromise safety, create legal risks and affect the continuity of our operations.

WHAT SHOULD I DO?

Data protection

- Use, share and store information responsibly and in accordance with internal rules.
- Do not forward work-related information to unauthorised personal accounts or tools.
- Use only tools and solutions that have been approved for processing and sharing information.
- Observe the rules on data retention and deletion.

Use of equipment and technology

- Use only equipment and tools approved by D'leteren.
- Protect equipment against loss, theft or damage; safeguard access with a password or PIN.
- Never share your login details.
- Use technology responsibly; any personal use must be kept to a minimum and must not affect the systems.
- Take care when working in public spaces (risk of being seen or overheard).
- Report any loss, theft or security incident immediately.

Prohibited behaviour

- Do not access information or systems without authorisation or to data not relevant to your role.
- Bypassing or disabling safety systems.
- Use of D'leteren's systems for illegal or inappropriate purposes.
- Sharing of sensitive information outside approved channels.

MANAGERS MUST

- ensure compliance with security and data protection rules;
- make sure that access to systems is strictly aligned with the requirements of the role;
- raise staff awareness of cyber risks and best practices.
- Respond promptly in the event of any incident or high-risk behaviour.

You can find all best practices in the [Acceptable Use Policy](#) which is available on the D'leteren intranet in the 'Cybersecurity' section.

The CISO Office (ciso.office@dieteren.be) is also available to answer any questions on these topics.



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USE OF ARTIFICIAL INTELLIGENCE

Artificial intelligence (AI) tools represent an important opportunity for D'leteren to improve efficiency and boost innovation. However, it is essential that we use these technologies in compliance with the applicable rules. AI must be used responsibly, in accordance with ethical principles, data confidentiality and the highest security standards. The results generated by AI must also be systematically analysed and verified to ensure they are accurate and reliable. Let's work together to ensure that AI serves the common good.

CONSULT IT

If you are considering using a new AI tool or working with a supplier that uses AI in the services it provides to D'leteren Automotive, please check this with the IT department by submitting a SEAM (JIRA) ticket. This enables the relevant teams to verify that the tool complies with the relevant requirements or that the supplier meets all obligations relating to the use of AI and the tool integrates seamlessly in our ecosystem.

If in doubt, the types of data listed below must never be used in an unvalidated AI system.

Personal data; sensitive personal data; HR data; customer data; supplier and partner data; financial data; strategic or confidential business data; legal and contractual data; cybersecurity data; passwords/user names and sensitive technical information; source code and development data; IT and cloud architecture data; non-public sales and marketing data; data relating to dealers, distributors or independent networks; compliance, audit and risk data.

In all scenarios,

- you are responsible for what you share;
- you must observe data classification rules;
- you must check the answers given;
- you cannot allow AI to make sensitive decisions on its own.

In other words, AI can support decision-making, but can never replace it.

If you have any questions, please contact the Privacy Office (privacyoffice@dieteren.be) or the CISO Office (ciso.office@dieteren.be).



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PROTECTION OF CONFIDENTIAL INFORMATION AND INSIDER TRADING

Protection of confidential information is a fundamental commitment at D'leteren. This information relates, in particular, to our staff, customers, partners and suppliers, as well as our activities, strategies and projects. We take care to protect its confidentiality and prevent any unauthorised access or disclosure. This protection is essential to maintain trust, meet our legal obligations and safeguard our competitive position.

In the course of our work, we all have access to sensitive information. Respecting confidentiality is an individual responsibility that applies in all circumstances, including after the end of the employment contract.

WHAT SHOULD I DO?

- Protect the confidential information I have access to in the course of my work.
- Share this information only where necessary for work purposes and only with authorised persons.
- Remain vigilant in public places and in my communications (spoken, written and digital).
- Avoid any situation that could lead to the accidental disclosure of sensitive information.
- Ask my manager for advice if I am unsure whether information is confidential or can be shared.

INSIDER TRADING

In the course of my work, I may have access to non-public information that could potentially influence the share price of the D'leteren Group or other companies.

This information is strictly confidential.

- It is forbidden to disclose it within the company or to third parties.
- It is prohibited to buy or sell shares or other securities on the basis of this information, either directly or indirectly.

Only publicly available information may be shared or commented on. Any disclosure of financial or strategic information is strictly regulated.

Rules on inside information also apply to information on other companies (customers, suppliers, partners).

IMPORTANT TO KNOW

It is prohibited to disclose or use any commercial or confidential secrets for personal purposes, whether during the employee's employment or after his or her employment contract with D'leteren has been terminated.

This ban also applies with respect to internal mobility within the Group. Confidential information obtained in one Group entity may not be used in another.

Any breach of this non-disclosure obligation is a legal and contractual breach, as a result of which the employee and D'leteren can be liable to sanctions, in particular by the Belgian Competition Authority.

MANAGERS MUST

- ensure clear understanding of confidentiality issues and look out for risk situations;
- support staff in situations of doubt;
- ensure compliance with rules on sensitive information and inside information.



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COMMUNICATION AND EXTERNAL COMMITMENTS

D'leteren communicates actively with its customers, the media, investors and all stakeholders. To ensure the consistency, accuracy and compliance of the information provided, any external communications made on behalf of D'leteren are supervised and restricted to authorised personnel. Responsible, consistent and well-managed communication strengthens our stakeholders' trust and protects D'leteren's reputation.

WHAT SHOULD I DO?

External communications

- Check that all information communicated is accurate, complete and verified.
- Do not speak on behalf of D'leteren without prior authorisation.
- Forward any media enquiries to the Public Relations department.
- Direct all enquiries from investors or analysts to the D'leteren Group's financial communications department.
- Obtain approval from the relevant teams before any communication on sensitive matters (financial, legal, regulatory, ESG, etc.).
- In the event of a crisis, pass on any relevant information immediately and follow the instructions given to the letter.

Use of social media

- Never disclose confidential information.
- Make sure you do not share any non-public information (financial data, products not yet launched, disputes, etc.).
- Make it clear that I work for D'leteren whenever I speak about its activities.
- Restrict my comments to my area of expertise.
- Ensure that what I say is accurate and not misleading.
- Observe rules on intellectual property, copyright and image rights.
- Update my professional details in the event of any change of role or if I leave the company.



Content

We are all D'leteren !

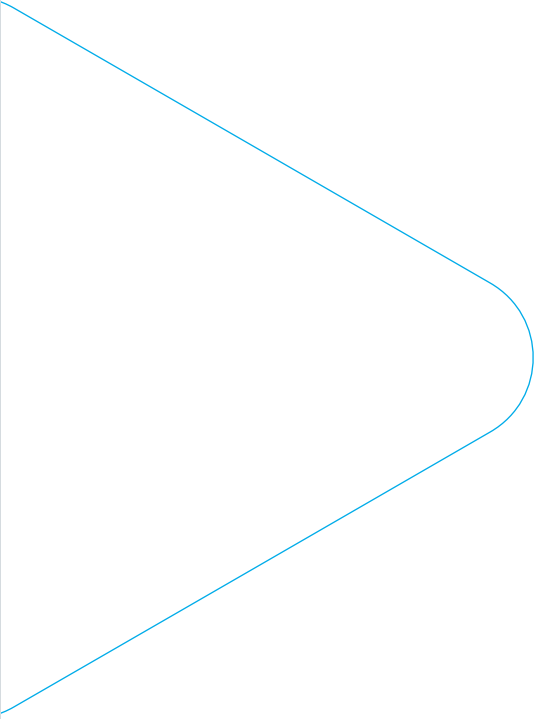
The WayWeWork
in practice

Speak Up

We act in an ethical
and responsible
manner

We respect each other

Protection of
D'leteren's property



Thank you

Content

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Moving people ► forward

D'leteren

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