

Code of conduct



Möller Mobility Group

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Our core values

– Working for Møller Mobility Group should be challenging, inspiring and fun!

HONEST AND TRUSTWORTHY

– How we build trust

- We're reliable, keep our word and are incorruptible
- We respect agreements, rules, guidelines and work processes
- We respect the company's property, equipment and information

CLEAR

– How we create security

- We communicate clearly and understandably
- We provide clear feedback, both positive and negative
- We set clearly defined goals, roles, responsibilities and authority
- We make clear, unambiguous agreements
- We focus on style, form and content in everything we say and do

PROACTIVE

– How we grasp opportunities

- We dare to take new paths by being ahead of the game
- We take calculated risks – and learn from our mistakes
- We dare to challenge established truths
- We appreciate drive and determination

OPEN-MINDED AND CARING

– How we take care of each other

- We care about people, our colleagues, our customers and the environment
- We take care of and include
- We are generous, flexible and open minded
- We respect different ways of thinking
- We treat colleagues, customer and people in different roles with different cultures and backgrounds in a good way

It is up to us



Petter Hellman
Group CEO
Møller Mobility Group

We belong to a group with a strong market position, the best products, long-term owners and resources to shape the future. We have ambitions to be among the best workplaces in the Nordic countries and the Baltic States – across industries. If we are to achieve this, we must consciously maintain our core values and further develop our culture. With a strong ethical foundation, it is also easier to comply with our Code of Conduct.

Many of us have probably been in situations where we are uncertain about what is the right decision or what is correct behaviour. We can quickly end up in a dilemma or make the wrong choice. We must therefore do our utmost to make sound decisions that benefit Møller Mobility Group, our customers, society – and ourselves. In the international business world, this is called a Code of Conduct. We also tend to refer to it as 'the correct behaviour'.

I would like to encourage you to read the Code of Conduct with its guidelines for correct behaviour and use them throughout your working day. Each individual employee is significant. We can all make a difference. I also want to challenge you to have a good time at work, speak up when necessary,

be active and take the initiative. No one knows what you are thinking if you do not tell anyone. I want you to be proud of being a representative of the Møller Mobility Group. Everyone deserves that we show the best version of ourselves to each other.

TAKE RESPONSIBILITY

Møller Mobility Group wants to ensure that all our employees are equally well equipped to be able to make safe and appropriate choices. The Code of Conduct concerns more than simply avoiding breaking the law. It is just as much about how we behave towards each other and the world around us. Our core values are steeped in tradition and are a good benchmark for how we in the company foster a healthy business culture. At the same

time, we are still completely dependent on each individual person taking their own responsibility. We are also dependent on any deviations or irregularities being reported.

2021 marked a change of gear for our sustainability work. As the first in our industry, we submitted complete climate-related disclosures, and we are currently working on a number of measures to further reduce our emissions, to bring the Group below the 1.5 degree target by 2027.

As a summary of the main points of our Code of Conduct, we have formulated the following principles. We hope this will help make your working day easier when you are faced with a dilemma or a tough decision.

- Act in compliance with our core values
- Respect internal guidelines
- Adhere to legislation and regulations
- Practise zero tolerance with regard to corruption
- Be open with your immediate supervisor or colleagues about any dilemmas that you are faced with
- Never place your own personal gain ahead of the best interests of the company
- Respect your duty of confidentiality
- Report anything you believe is wrong



| We are all valuable



Øyvind Schage Førde
Chairman of the Board of
Møller Mobility Group

Møller Mobility Group has long traditions. Our solid foundation was laid by our founder, Harald Aars Møller, in 1936. The core of our Code of Conduct is based on his maxim: “Det gjelder å holde sin sti ren” (meaning: stick to the rules”).

We all have a responsibility to safeguard both each other and the business. Together we create good experiences for our colleagues and customers alike. Our core values describe how we are to work together in order to build a valuable and rewarding company – as well as the attitudes that should characterise Møller Mobility Group. Abiding by our core values ensures high business ethics.

We as owners will also do what we can to make the Møller Mobility Group a meaningful work place. In this way we create values as well as enduring and solid workplaces.

I am proud to represent a company like Møller Mobility Group with the strong position we have acquired as one of Northern Europe’s leading car groups. Without you, this success would not have been possible.

Sticking to the rules and adhering to the Code of Conduct is a timeless expectation of everyone at Møller Mobility Group. If you make yourself familiar with the Code of Conduct and use it as a guide for the working day, it will help you to avoid making mistakes. Every single person is significant in an organisation. We are all valuable.

We will continue to focus on this in our new strategy, in which people and sustainability are two of the main pillars. In this context, sustainability means both social sustainability and environmental sustainability. Everyone is welcome to work at Møller Mobility Group, and by sheer virtue of our size, the requirements we set for our suppliers have a real impact.

A GOOD COMPANY

We want working for Møller Mobility Group to be challenging, inspiring and fun. A prereq-

uisite for this is that we avoid negative events and experiences. We all have a responsibility to look out for both each other and the business. Together we create positive experiences for our colleagues and customers alike. Our core values describe how we are to operate in order to build a valuable and rewarding company – as well as the attitudes that should characterise Møller Mobility Group.

HONEST AND TRUSTWORTHY

Honest and trustworthy are the basis for building trust with customers and colleagues. Speaking your mind and standing up for what you believe are highly valued in Møller Mobility Group. This also means that we must be dependable, keep our promises and respect rules, regulations and agreements.

CLEAR

Clearly defined roles with responsibility and authority are important in order for us to achieve our goals. Clear communication is vital when it comes to customer contact, partners and colleagues.

PROACTIVE

In Møller Mobility Group there is room to challenge conventional wisdom. This is a requirement if we are to be able to take new routes and develop timely work processes.



OPEN-MINDED AND CARING

We care for and look after our colleagues, people in general, customers and the environment. Møller Mobility Group's goal is to be an inclusive, caring, generous, open-minded, flexible and unpreju-

diced company. That is how we create good working days. Through awareness of and compliance with our core values we gain a solid footing which allows us to stick to the straight and narrow.

Our duties for a good corporate environment

Møller Mobility Group's Code of Conduct is a set of ethical guidelines on correct conduct that apply to everyone: regardless of the company, country and profession. Everyone has a personal responsibility for ensuring we are an honest and ethical business.

Common goals and guidelines make for a good corporate environment. Møller Mobility Group's Code of Conduct applies to everyone associated with our business. All companies, managers, employees, board members, suppliers and contracted resources must adhere to our Code of Conduct.

THE RIGHT CHOICE

All employees in Møller Mobility Group have a duty to familiarise themselves with the guidelines and rules. This is also important because you need to know what rights and opportunities you have to find the best solution to a challenge that may have adverse effects if not handled ethically correctly. It is the responsibility of the line management to promulgate the guidelines and to make provision for their compliance. Møller Mobility Group has zero tolerance for infringements of the law, ethical

guidelines or other directives and will in such cases initiate disciplinary action, and at worst, dismissal.

WHISTLEBLOWING ENABLES IMPROVEMENTS

We encourage everyone to report irregularities as and when they are discovered or occur. Whistle-blowing is not tale-telling, but an opportunity to make improvements. Examples of undesirable behaviour include discrimination, bullying and harassment of employees, embezzlement, bribery and corruption – or violations of the Supplier Code of Conduct. There are procedures for whistleblowing on the Møller Intranet, and you have the right to report matters directly to the chairman of the board of directors.



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I feel there is a great acceptance to come up with new solutions. We are also allowed to make mistakes.

Bente Næss
Volkswagen Møller Bilfinans
Frysja

Sustainability is our future strength

Our customers, employees, society and owners expect Møller Mobility Group to contribute to responsible and positive development. These are expectations we must live up to.

Møller Mobility Group's founder, Harald A. Møller, had one maxim: "*Det gjelder å holde sin sti ren*" (meaning: stick to the rules). This mantra has had a strong influence on the Group, underlying Møller Mobility Group's core values of Honest and Trustworthy, Clear, Proactive, and Open-minded and Caring.

"Stick to the rules" has also been the premise of our approach to sustainable business. Sustainability means we must harvest and sow in a way that ensures that future generations have as good a starting point as we had. This is a matter of economic, social and environmental security. For us, in practice, it means the following: New customers have high expectations and increasingly demand sustainable products and services. Employees want to work for companies that are involved in helping resolve our era's challenges. Suppliers are expected to meet specific require-

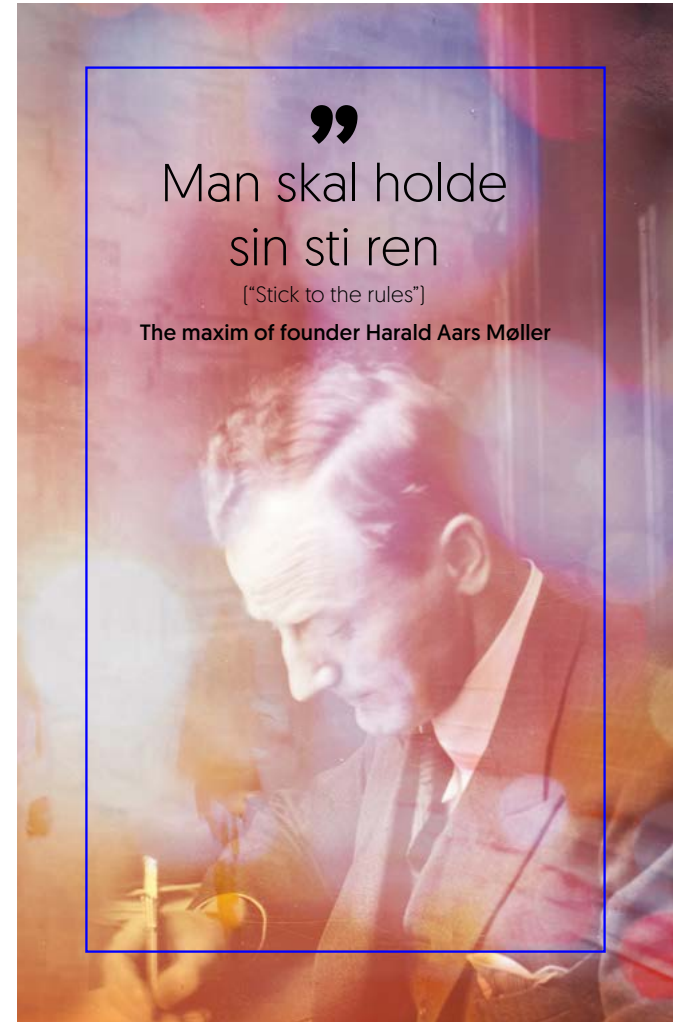
ments set by private and public enterprises, which want to buy sustainable products from their sub-contractors. Investors and lenders are increasingly demanding sustainability in their financing.

These are the reasons why we at Møller Mobility Group have also placed sustainability at the top of the agenda, together with our genuine desire to be part of the solution, not the problem, in the future.

Møller Mobility Group has a leading role in the green shift in Norway through the electrification of the Norwegian car fleet. "We will continue to be an active driving force for ensuring that an ever-increasing share of the fleet becomes emissions-free.

SOCIAL AND ENVIRONMENTAL SUSTAINABILITY

At the same time, within our own organisation we are committed to ensuring both social and



environmental sustainability at every level of our business and value chain. In 2021, this involved setting clear, quantifiable targets to maintain the direction and momentum of our sustainability efforts going forward. With a view to doing what we can to cut emissions in our own operations and value chain, we have chosen to commit to the Paris Agreement's provisions to limit global warming to 1.5°C, and have set science-based emissions reduction targets in line with the recommendations of the Science Based Targets initiative [SBTi]. Møller Mobility Group's operations shall help promote human rights, good labour practices and environmental standards, and zero tolerance for corruption.

PROFESSIONALISM IN THE AUTOMOTIVE INDUSTRY

Møller Mobility Group shall strive to have a sustainable social mission that actively contributes to combating climate change and its consequences, as well as contributing to gender equality and diversity. The Group's sustainable social mission shall be an integral element in how the company conducts long-term, profitable business.

Every industry is prone to rogue operators, companies or individuals performing undeclared work. Møller Mobility Group has a zero-tolerance policy on any transactions intended to avoid or evade necessary taxes and duties. Ever since the company was founded, we have honoured our pledge to live up to our founder Harald Aars

Møller's ever-relevant motto: "Stick to the straight and narrow".

With Møller Medvind, we also want to tackle the car-care sector, where, all too often, corners are cut, and working conditions sometimes fail to meet the standards we expect in Norway. We cannot do this alone, but we aim to make a difference in the best possible way.

Møller Medvind has been formally consulted by regulators in connection with the new legislation that came into force in Norway in June 2022. This Act criminalises the purchasing of undeclared car-care services, and an accreditation scheme, combined with certification of qualified service providers, will help to professionalise the car-care industry.

ISO 14001 ENVIRONMENTAL CERTIFICATION

ISO 14001 is the internationally recognised environmental management standard. This generic standard is suitable for organisations in all industries. Developed by the International Organization for Standardization [ISO], the standard is based on two concepts: continuous improvements and legal compliance [source: DNVGL].

In December 2011, Harald A. Møller AS was certified in accordance with the ISO 14001 environmental management system. The certification formalises our environmental pledge, and

commits us, to an even greater degree, to taking environmental responsibility and implementing measures to reduce the overall environmental impact of our business.

The ISO 14001 standard requires us to make an inventory of all environmental impacts and take action to rectify procedures in priority areas. ISO 14001 establishes a precautionary practice for our environmental impact. Continuous improvement and compliance are the mainstays of ISO 14001. The certification is carried out by an independent third party [TÜV].

All Møller Bil dealerships are certified individually according to the 9001:2015 and 14001:2015 standards by TÜV SÜD. Møller Bil repair centres are all certified according to ISO 14001:2015 by A3 Certifiering AB. Møller Logistikk Klargjøring, which details all vehicles arriving in Norway, is also ISO 14001-certified.

Möller Bil Sverige AB is certified according to the Swedish SS-EN ISO 14001:2015 standard. In the Baltics, importers and dealerships are ISO 9001-certified. ISO 14001-certification is also under consideration. The importer is the certifying body for the dealerships, and also has the role of raising awareness of environmental impacts, regulatory requirements and environmental goals.

2 > Møller Mobility Group's internal guidelines



Our internal guidelines

Møller Mobility Group's Code of Conduct is a set of ethical guidelines on correct conduct that apply to everyone: regardless of the company, country and profession. Everyone has a personal responsibility for ensuring we are an honest and ethical business.

HEALTH AND SAFETY

Systematic work on occupational health, safety and the working environment is a governmental requirement. This work must ensure that – at all levels of the business – working methods are used to ensure that health, safety and the working environment are systematically evaluated and due regard is given to planning, preparation and execution of work.

Systematic health and safety work is also a tool for improving the Møller Mobility Group's results by preventing injuries and sickness absence and improving the quality of the work that is done.

All employees undertake to abide by the legislation, rules and regulations that apply in the country in which the business operates. Our goal is to avoid injury to personnel and damage to

property, create a good working environment and maintain awareness and concern for our surroundings.

HR POLICY

Møller Mobility Group aims to be one of the best places to work in our markets – regardless of industry. Diversity and equality are important factors to achieve this goal. We believe that diversity contributes to a better social environment at work and better work processes, both strategically and operationally. We strive to ensure fair and considerate treatment of all employees. Everyone must have equal opportunities without discrimination on the grounds of age, gender, gender identity, sexual orientation, ethnicity, disability, religion or belief.

Both employers and employees have a responsibility to:



All employees must have a health-promoting and safe working environment. Remember that everyone has a responsibility to contribute to a good working environment.

Brigt Stelander Skeie
Health and safety advisor in
Møller Mobility Group

- Ensure that everyone – colleagues, customers, business connections and others – is treated with dignity and respect.
- Contribute to maintaining an inclusive work environment without any form of discrimination, bullying or persecution.

SERVING OF ALCOHOL IN CORPORATE CONTEXTS

Alcohol is a frequent component of corporate parties, Christmas events, car launches, etc. Consequently many employees are exposed to alcohol – often served free of charge. Our employees span all ages and are all different, but regardless of this it is a management responsibility to plan and carry out events in such a way that no-one ends up in an unfortunate or embarrassing situation.

Moderation is the responsibility of each individual employee, but it is only when we are clear and consistent regarding the principles that we can expect our employees to understand where the line is drawn.

FINANCE

Various laws govern the principles of bookkeeping and financial reporting. Additionally we have our own controlling procedures and rules to ensure good quality of our financial information and to prevent financial irregularities.





- All payments must be based on invoices/receipts that have been approved by authorised persons
- Payment transactions must be approved by two persons
- If you suspect a breach of control procedures, signature falsification or fraud, this must be reported to the line management

SAFEGUARDING ITEMS OF VALUE

Physical property, intellectual property rights and other information must be treated with due care and consideration to avoid loss, theft or other damage. Intellectual assets include, for example, patents, organisational diagrams, technologies and processes, manufacturing methods and plans for marketing, advertising and business development.

USE OF ICT TOOLS

Møller Mobility Group's policy for use of ICT tools is described in more detail in the Employee handbook. The purpose of this policy is to provide guidelines for all employees on the use of ICT tools in the workplace.

This shall ensure that:

- Information is stored in a safe manner
- Network capacity is not abused
- The internet is not used in an unethical manner (for example, viewing pornographic content)

- Computer viruses and malware do not gain access to our network

Communication via e-mail can be seen as having originated from and on behalf of Møller Mobility Group. Consequently we must remain vigilant to not reveal information of a commercially sensitive nature or that may have unintended consequences of a contractual or legal nature. The Employee manual also stipulates regulations concerning the use of social media.

If you have any questions regarding the use of ICT tools, contact the Møller IT customer centre.

IMPORTANT RULES FOR SOCIAL MEDIA

- Colleagues, employers, neighbours and friends can read what you write.
- When you post material on social media, it is published in the public domain, where it can be accessed by journalists, professionals or other third parties with an interest in what you are writing about.
- When you post something on the internet that anyone can see, think in the same way as you would when talking to a person you do not have a close relationship with or sending e-mail to a person you do not know. Do not say anything on a public website that you would not have said in these kinds of situations.
- Do not share information of a confidential or sensitive nature, nor any company-internal information that you may have received from anyone else.
- Raise any discussions concerning challenges in your work or the workplace directly with your supervisor – and not on the internet.
- In the majority of cases, use of social media should be reserved for off-duty time, unless you believe it is important for your work tasks.
- Think about your personal digital footprint. Posts you publish on social media will often remain visible and searchable for many years, if not forever.



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Do not make choices
that make you later wonder
whether they were
right or wrong.

Øyvind Vegel

Leasing manager for used cars
Møller Bil Romerike

3 > Loyalty, impartiality and conflicts of interest



The common good always comes first

Møller Mobility Group trusts its employees. We have a large, decentralised organisation where many employees have access to all our systems.

It is important that in your daily work you think through just how far your own powers go. Furthermore, we ask that you remember the principle of “yours and mine”.

- You shall not let personal interests affect your work or let personal interest or gain come in the way of your work for Møller Mobility Group.
- Nor must you ever participate in or influence a decision or settlement if there is any conflict of interest or other circumstances that may affect confidence in your impartiality.
- It is your responsibility to avoid or prevent any conflict of interest that you might become party to.
- A conflict of interest may, for example, include customers, suppliers, partners, current or potential employees, competitors or other businesses.
- Circumstances that constitute a conflict of interest for you individually will likely constitute

a conflict of interest if they involve a family member.

- If there is a risk of a conflict of interest, or if you are in doubt as to whether this is the case, you must on your own initiative raise the matter with your immediate superior.

OUR RELATIONSHIPS WITH OUR CUSTOMERS, SUPPLIERS, COMPETITORS AND PUBLIC AUTHORITIES

- In line with our core values, the Møller Mobility Group wants an open and good relationship with our customers, suppliers, competitors and public authorities.
- Møller Mobility Group's ambition is to have the most satisfied customers. As an employee you must always seek to meet the customer's needs in the most appropriate manner.
- Our suppliers shall be treated impartially and fairly. When entering into new supplier agree-

Our core values

Honest and trustworthy

Pro-active

Open-minded and caring

Clear

“

Working for Møller Mobility Group should be challenging, inspiring and fun!

Møller Mobility Group

ments, our Code of Conduct must be presented and included as part of the agreement with the supplier. Larger contracts will be awarded through tender competitions with equal conditions for all providers.

- All collaboration with competitors that prevents free competition is prohibited. Under no circumstance shall you cause or contribute to any breach of general or specific competition legislation through, for example, pricing collabo-

ration, illegal market sharing or other activity that is in breach of applicable legislation.

- Relationships with public authorities must always be handled in a professional manner. In the event of an unannounced visit from a public authority, the corporate guidelines in this area shall be adhered to. Read more about this on our “Readiness portal” on the Intranet.

IMPARTIALITY

If your impartiality is challenged through your role in the company, you must consult your immediate superior.

This may, for example, prevent you from taking up a consultancy role, board position or extra job at a competitor, supplier or customer without prior approval from the CEO or HR Director. Examples of other circumstances that can create conflicts of interest are if you:

- Offer a family member or close friend a job in the company.
- Run a business in your free time that is of the same type as your job in the company.
- Place contracts on behalf of the company with a supplier that is owned or managed by a family member or close friend.



4 > Bribery and corruption



Our reputation depends on our integrity

Møller Mobility Group has zero tolerance for corruption and bribery. Employees must not attempt to steer individuals' decisions by exercising inappropriate influence or allow themselves to be influenced through bribery.

Bribery and corruption are threats to sound business practice, and any failure to follow our guidelines in this respect will damage our reputation and credibility.

- You must never accept personal payments, gifts or other services as recompense for actions taken in your daily work.
- Similarly, you must never make or offer personal payments, gifts or other services to business associates in order to gain benefits.
- It is the duty of every employee to report corrupt practices. Turning a blind eye to bribery and corruption may have repercussions for both the individual concerned and the company, in addition to damaging our reputation and credibility.

GIFTS, SPONSORSHIP EVENTS AND ENTERTAINING

As an employee of Møller Mobility Group you must never give or accept gifts or personal benefits that can affect your integrity.

Hospitality such as social events, dinners or entertainment can be accepted by an employee if there is a clear business reason for doing so, on the condition that the costs for such arrangements are within reasonable limits. Refer also to each country's guidelines on the Møller Intranet.

We must decline participation in major events where both travel and accommodation are covered, unless approved by the Group management.



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Speaking about values, they help me every day and they are a daily necessity because when you are honest and trustworthy, it's easier to reach a compromise with both clients and colleagues.

Paulius Vaičiulis
Warranty Supervisor
Moller Baltic Import

PERSONAL BENEFITS

Many employees have a company car. Purchases of accessories and use of the fuel payment card must be directly connected to the company vehicle. Use of the card for payment of parking is only permissible on company business. The company fuel debit card must only be used for business purposes.

We have guidelines on limits for amounts chargeable in connection with the purchase of mobile telephones, as well as how often employees can buy a new phone at the company's expense.



5 > Communication with the outside world





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When I'm honest, I can be confident that the client is happy, that our colleagues are motivated and that the company can achieve its goals.

Gražvydas Nocius
Aftersales Manager
Møller Auto Vilnius

A single voice in dialogue with society

Remember that everything that is written and said about Møller Mobility Group can affect our reputation.

Only specified, authorised persons are allowed to make public statements on behalf of the company.

- If you are contacted by the media, forward the inquiry to Møller Mobility Group's Sustainability and Communications Department or the head of communications for the various brands.
- If you have been authorised to provide information about the company to the public, be careful in what you say, and ensure that the information you provide is correct, precise, consistent and clear.

DUTY OF CONFIDENTIALITY

All employees and associates in the company sign a declaration of confidentiality on joining the Group and undertake not to disclose trade secrets or other confidential information to unauthorised persons.

Trade secrets include internal product descriptions, calculations, marketing strategies, customer infor-

mation, personal data, contracts, etc. Unauthorised persons include other employees in the company, unless a degree of information exchange is necessary in order to carry out the work.

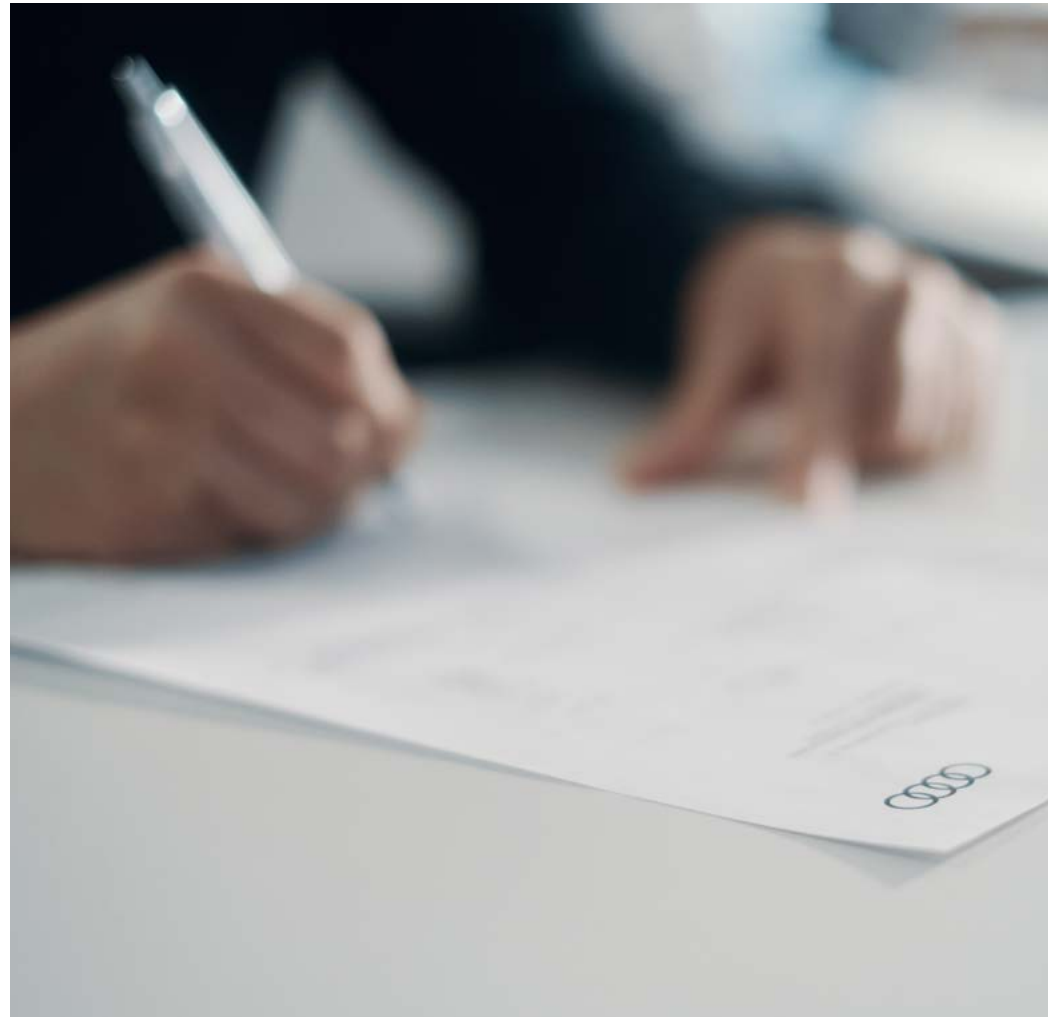
You shall keep as confidential all business and other matters that could allow third parties unauthorised access to confidential information and be careful not to discuss internal affairs under conditions where the discussion may be overheard by unauthorised persons.

The following employees have a more stringent duty of confidentiality concerning personal data and other information they may become aware of during the course of their duties:

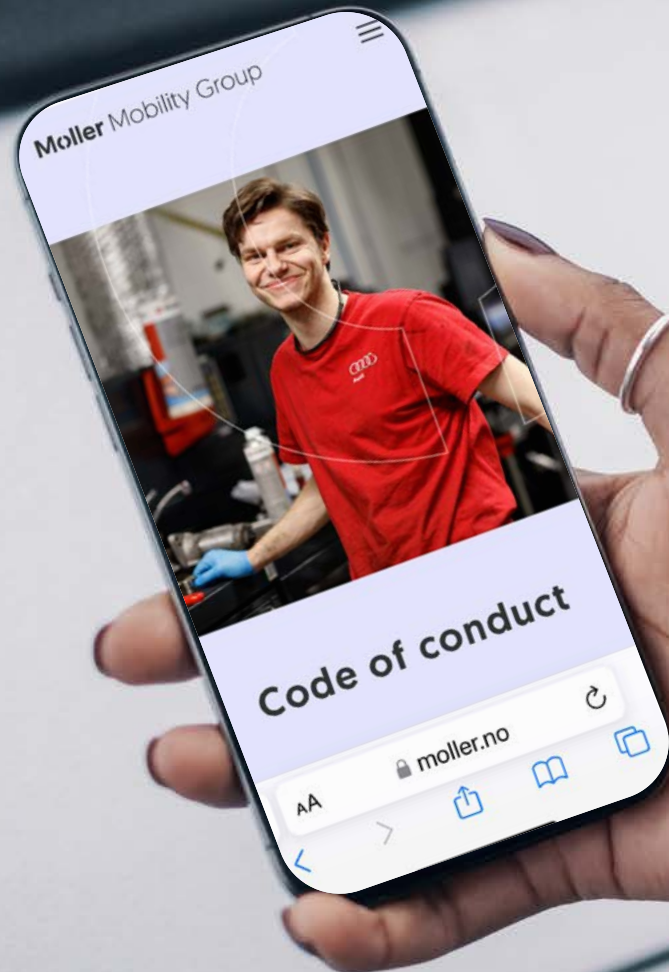
- Employees with access to personal data
- Employees with access to video/CCTV surveillance or security checkpoints

- Employees with access to e-mail systems, datalogs, e.g. persons with super-user access to e-mail, logs, etc.)

The duty of confidentiality also applies when work or a contractual relationship has come to an end and for as long as the information is considered to be sensitive in terms of competition or otherwise confidential.



6 > Whistleblowing



Everyone's safety depends on you speaking up

If you witness someone behaving in contravention of this policy, it is your responsibility and duty to advise your immediate superior.

If you find it difficult to report a matter to your immediate superior, HR or other manager, use our whistleblowing service, which is described on the Intranet, under Møller, where you can also choose to report matters anonymously.

WHAT IS WHISTLEBLOWING?

- Whistleblowing is the process of reporting unacceptable circumstances to someone empowered to do something about it. Unacceptable circumstances include violations of laws, violations of internal rules, violations of ethical norms, misappropriation of funds or actions that are contrary to our core values.
- Employees are encouraged to report any unacceptable circumstances, as this can contribute to the positive development of Møller Mobility Group.
- Employees are duty-bound to inform the management of any criminal acts and matters that may cause harm to life and limb.

OUR WHISTLEBLOWING POLICY

An important pillar for the application of our core values is managers who are accessible and open to dialogue. Most matters can be resolved locally before they develop into problems where others need to be involved. An “open door” policy encourages everyone to ask questions and share any worries they have – of a legal or ethical nature, as well as matters concerning the quality of work and the working environment. All managers are required to adopt this attitude through an “open door” policy for employees who wish to engage in dialogue.

If in spite of this it should still prove that you are exposed to, or witness unacceptable circumstances, we have a whistleblowing channel that we encourage you to use.

Examples of areas that may be reported:

- corruption and bribery



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Care and consideration
for each other helps
create well-being.
Well-being is the very
foundation for doing
a good job.

Elin Rosnes Sinervo
Managing Director Audi,
Harald A. Møller

- harassment, bullying or discrimination
- violations of tendering rules or procedural rules
- serious breaches of rules concerning health, safety and the environment
- violations of human rights and decent working conditions

EMPLOYEES' RIGHTS

Møller Mobility Group strives to maintain a low threshold in relation to whistleblowing and encourages all employees to immediately report any unacceptable circumstances.

Allegations of unacceptable circumstances can be a burden for the person(s) the report concerns, for the business and for their colleagues as well as the psychosocial working environment. Many people also feel that reporting unacceptable circumstances is a burden in itself.

Employees ought to ask themselves:

- Do I have grounds for the criticism I am making?
- What should I do?
- To whom should I report this matter?

If you are in doubt about to whom you should report a matter, ask your employee representative or the internal whistleblowing team. Whistleblowing can be done anonymously, but normally a policy of openness ensures smoother proceedings and a better outcome for all parties involved. The informant's identity must remain confidential.





If you are in doubt,
ask your immediate
superior.

REQUIREMENTS FOR MANAGERS IN MØLLER MOBILITY GROUP CONCERNING WHISTLE-BLOWING ROUTINES

Møller Mobility Group strives to maintain a low threshold in relation to whistleblowing and requires that all managers encourage the employees to immediately report any unacceptable circumstances in the workplace.

Møller Mobility Group employees must be confident that they can raise issues concerning unacceptable circumstances, and that the company will handle and follow up the matter appropriately and properly.

The Møller Mobility Group management is responsible for resolving matters that are reported.

This shall be done based on the following premises:

- Any unacceptable circumstances must be addressed immediately. The person who reported the matter shall receive confirmation within a week of having raised the issue.
- Employee representatives / safety delegates shall be included in the work to assess the need for action, as well as the preparation and implementation of specific measures.
- If it turns out that the criticism is unfounded, or based on a misunderstanding, the person who reported the matter shall be given a proper

explanation. The management has a responsibility to look after individuals who have been subjected to unfounded criticism.

MØLLER MOBILITY GROUP'S MANAGEMENT ALSO HAS RESPONSIBILITIES

The management shall facilitate measures to promote transparency and good communication in the business:

- Establish meeting points
- Promote openness
- Stimulate discussion
- Raise questions
- Provide information
- Have a "hands-on" management ethos
- Contribute to and facilitate an active employee protection service (working environment committee, employee representatives)

See Møller Intranet for further information: search for "[whistleblowing](#)"

If you are in doubt, go through the questions one more time! Violation of the Code of Conduct may lead to personal legal liability and disciplinary measures. It is impossible to describe all the conceivable dilemmas that employees might come across in the course of their daily work. If you are in doubt, ask your immediate superior. Or you can ask yourself the following questions when faced with a difficult matter:

- Is this in line with our core values?
- Is what I am doing in line with ethical and moral principles?
- Is this within the law and am I authorised to do this?
- Have I understood the risks involved, including the risk to Møller Mobility Group's reputation?
- Will I be able to look back five years from now and feel proud of my actions?
- If this ends up in the public domain, will I still feel that I have done the right thing?

If you are unsure, seek information!

Employees have several means of reporting matters internally within the Møller Mobility Group.

WAYS OUR EMPLOYEES HAVE TO WHISTLEBLOW

- To their responsible manager
- To the manager of the business area concerned
- To Møller Mobility Group's HR manager
- To the manager for risk and compliance in Møller Mobility Group (direct reporting line to the chair of the board of Møller Mobility Group)
- To the CEO of Møller Mobility Group
- To the chair of the board of Møller Mobility Group

ANONYMOUS REPORTING WITHIN MØLLER MOBILITY GROUP

- Deloitte is our whistleblowing partner (see next page)

Reporting to other parties, for example, other public authorities, should be considered only after you have first exhausted the above options.

For additional information about whistleblowing, refer to the separate document on this subject on the Møller tab on the Intranet.



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Clarity in communication is one of my favorite values, because it is very practical. If all of us clearly state what we really think and need, we would save a lot of time and protect ourselves and others from heartache, pain, and misunderstanding.

Aiga Razumovska
CFO, Moller Baltic Import

Summary of whistle blowing routines

These whistle blowing routines apply to all employees of Møller Mobility Group (MMG), Volkswagen Møller Bilfinans and Møller Eiendom. The whistle blowing routines can be found on our Share-Point site in their entirety.

WHAT IS WHISTLE BLOWING?

Whistleblowing is reporting objectionable conditions in the workplace. Objectionable conditions can be violations of legal regulations, internal rules, ethical norms or actions contrary to our basic values

As examples, these can be:

- danger to life or health
- danger to the climate or the environment
- corruption and bribery
- abuse of authority
- unhealthy working environment such as bullying and harassment
- breach of personal data security

Statements about matters that only apply to the employee's own employment, such as e.g. complaints and dissatisfaction are not considered notification.

SHOULD I WHISTLEBLOW?

Employees are encouraged to report objectionable conditions because it can contribute to positive development in your workplace.

Employees also have a duty to report harassment, bullying or discrimination at the workplace, violations of the law and conditions that may endanger life and health.

If you are unsure whether you should whistleblow about an incident, you can discuss the matter with HR or with contact persons in our external notification channel.

Relevant contact information can be found on the next page.

HOW DO I WHISTLEBLOW?

Report internally

You can always notify your local manager directly by chat, telephone or e-mail. You can also choose to notify via your local shop steward or safety representative or go through your lawyer.

External whistleblowing channel

Møller Mobility Group has an external whistleblowing channel operated by the law firm Deloitte. Here you can report either openly or anonymously.

Public authorities

You can always report externally to a public supervisory authority or another public authority.

Media

It is only in very special cases that the media should be notified. Read the whistleblowing procedures for more information.

YOUR SUMMARY OF AN INCIDENT

Your report can be verbal or written. We recommend that it be in writing. In the report, it must be explained what the incident is about.

A report should include:

- What happened? Is it a violation of law, rule or regulation; a violation of internal guidelines or ethical norms?
- Who is involved?
- Where did it happen? Where was it discovered?
- Has it occurred several times?
- Were there witnesses present?

PROHIBITION AGAINST RETALIATION

Retaliation against an employee who reports objectionable circumstances in a reasonable manner is prohibited.

By 'retaliation' it means any unfavourable action, practice or omission that is a consequence of or a reaction to the employee having reported an incident.

Reprisals can be:

- Threats, harassment, unfair discrimination, social exclusion or other inappropriate behaviour
- Warnings, change in work duties, relocation or demotion
- Suspension, dismissal, dismissal or disciplinary action

We guarantee that reporting untoward circumstances will not have any negative consequences for you or your working relation.

HOW AN INCIDENT IS HANDLED

Case processing via external whistleblowing channel (Deloitte):

Feedback

If you have notified openly or used a secure mailbox, you will receive a written confirmation that the notification has been received.

Investigation

Deloitte will obtain sufficient information to make an objective assessment of the incident. This means that you can get follow-up questions.

Reporting

After Deloitte has made the necessary assessments, they will send a report to the person responsible in Møller Mobility Group. The whistle-blower's identity will be confidential/anonymous.

Follow-up

Further actions are assessed whether there is a need.

**ANY
QUESTIONS?****Contact Møller Mobility Group**

Kjell Gåsbakk

Risk and internal audit

+47 90 78 78 68

kjell.gåsbakk@moller.no

7 > Test yourself!



Can you answer yes to this?

If at any time I am unsure whether my behavior complies with the principles set out in our Code of Conduct, I should ask myself the following questions:

1. Did I take all relevant matters into consideration and weigh them properly? (**content test**)
2. Am I confident that my decision is within the constraints of legal and company requirements? (**legality test**)
3. Do I stand by my decision when it is revealed? (**supervisor test**)
4. Am I in favor of all such cases being decided the same way company-wide? (**universality test**)
5. Do I still think my decision is right when my company has to justify it in public? (**public test**)

6. Would I accept my own decision if I were affected? (**involvement test**)
7. What would my family say about my decision? (**second opinion**)

If my answer to questions 1– 6 is “yes” and the answer to question 7 is positive, my behavior is very likely to be compliant with our principles. If questions remain unanswered or if I have any doubts, I should get in touch with any of the points of contact listed in this chapter.



If my answer to questions 1– 6 is “yes” and the answer to question 7 is positive, my behavior is very likely to be compliant with our principles.

8 > Our reporting



Reporting in Møller Mobility Group

Møller Mobility Group shall transparently provide internal and external information on all significant matters that determine how the Group operates and is judged by the outside world. The Code of Conduct describes the use and handling of internal and external information. Through our detailed climate-related disclosures, which are published each year in our Annual and Sustainability Report, we report all our indirect and direct emissions within scope 1, 2 and 3.

In 2020, we boosted our reporting with complete, externally prepared climate-related disclosures for the entire Group in line with the GHG Protocol. For 2021, we have also adopted the Task Force on Climate-related Financial Disclosures (TCFD) framework as part of our climate-related reporting, which will be incorporated into our standard reporting.

On July 1, 2022, the Norwegian Transparency Act came into force. This Act protects human rights and ensures decent working conditions throughout the entire supply chain, and is the result of increased expectations regarding ethical conduct.

As a large-scale purchasing organisation with substantial purchasing volume, Møller Mobility Group

is committed to partnering with our suppliers on continuous improvement along the value chain. This new legislation will promote businesses' respect for universal human rights and decent working conditions, and ensure public access to information. The Act imposes a duty of disclosure on businesses and makes due diligence mandatory.

It is important to emphasise that even if a business is actively engaged in due diligence processes, this does not preclude its potential negative impact on people, society and the environment. Rather, it indicates that the business is open and honest about challenges that exist or may arise and addresses these based on an overall assessment and prioritisation, and in consultation with the company's key stakeholders.

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Møller Mobility Group shall transparently provide internal and external information on all significant matters that determine how the Group operates and is judged by the outside world.

The UN's global standard

The UN's principles for responsible business practices, the UN Global Compact, is based on ten principles in the fields of human rights, working life standards, environment and anti-corruption – which all responsible businesses should follow. Being a signatory to the Global Compact means that we undertake to do our best to run our business in line with the ten principles. Møller Mobility Group has been a member of the United Nations Global Compact since February 2016, and we are committed to striving to operate the business in line with the Ten Principles in the areas of human rights, labour, environment and anti-corruption.

Global Compact is currently the world's biggest initiative for corporate social responsibility with more than 16,000 signatories, encompassing more than 12,000 businesses from 160 countries. The initiative helps customers, employees, investors and authorities understand that our business is doing its best to protect the environment, avoid corruption, and look after the interests of employees and human rights.

GLOBAL COMPACT HAS TWO MAIN GOALS:

1. To make the ten principles into a part of the corporate activities in businesses all over the world;
2. To promote activities and partnerships that contribute to the UN's goals, especially concerning sustainable development.

By participating in the UN Global Compact, businesses are able to contribute to markets, commerce, technology and finance being developed in a sound manner.

The ten principles build on international conventions, signed by all the member countries of the UN, and subsequently give a unique legitimacy and a specific language across the globe. Global Compact points to areas where improvement is necessary. The business shall openly report on the challenges it faces, and describe what the company is doing to protect the environment, avoid corruption, respect employment conditions and safeguard human rights. Møller Mobility Group is a member of UN Global Compact and reports in compliance with this standard.



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Care is about
respecting colleagues
and customers, also
from different cultures.

Nermin Eminovic
Service Manager
Møller Bil Ensjo

The UN Global Compact and the ten principles

Human rights

Principle no. 1

Businesses should support and respect the protection of internationally proclaimed human rights, and.

Principle no. 2

make sure that they are not complicit in human rights abuses.

Labour

Principle no. 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle no. 4

the elimination of all forms of forced and compulsory labour;

Principle no. 5

the effective abolition of child labour; and

Principle no. 6

the elimination of discrimination in respect of employment and occupation.

Environment

Principle no. 7

Businesses should support a precautionary approach to environmental challenges;

Principle no. 8

undertake initiatives to promote greater environmental responsibility; and

Principle no. 9

encourage the development and diffusion of environmentally friendly technologies.

Bekjempelse av korrupsjon

Principle no. 10

Bedrifter skal bekjempe enhver form for korrupsjon, herunder utpressing og bestikkelser.



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I greatly benefit from the core value Pro-active. I have a great freedom to make my own decisions.

Louise Lansburgh

Economy assistant
Møller Bil Uppsala

9 > Guidelines for suppliers



Guidelines for ethical trade

Møller Mobility Group (hereinafter MMG) is working to promote good working conditions and environmental standards in our supply chains.

We want to do this in close cooperation with our suppliers and partners. In order to clarify what we expect from our suppliers, MMG has developed a Code of Conduct for ethical business. The Code of Conduct covers basic requirements related to human rights, labour rights and sustainability.

MMG adheres to the UN's principles for responsible business practices – the UN Global Compact, which builds on ten principles in the fields of human rights, working life standards, environment and anti-corruption that all responsible businesses should follow. Being a signatory to the Global Compact means that we undertake to do our best to run our business in line with the ten principles. Our Code of Conduct has been prepared in accordance with these principles and the applicable ILO and ISO standards.

PRINCIPLES

Our suppliers must deliver goods and services to MMG that are produced in accordance with the Code of Conduct. The suppliers must also disclose and follow-up on the guidelines of their sub-contractors. At the request of MMG, the supplier must be able to demonstrate compliance. This can be done by self-declaration, follow-up dialogue with MMG and/or inspection of working conditions at the production site. If MMG wishes to inspect sub-contractors, the supplier is obliged to provide their name and contact information. MMG's Code of Conduct constitutes the minimum requirements. We expect all our suppliers to comply with applicable national and international laws and regulations, and these take precedence over our policies where their requirements are more stringent. MMG considers compliance with this Code of Conduct to be crucial in any supplier relationship. In the event of a violation of the Code

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In order to clarify what we expect from our suppliers, MMG has developed a Code of Conduct for ethical business.

of Conduct, MMG can terminate the agreement. It is up to MMG to assess the severity of any non-conformance and then decide whether to put in place a plan to improve the non-conformance or possibly terminate the agreement if the non-conformance is very serious.

REQUIREMENTS TO OWN OPERATIONS

MMG works continuously to improve its own policies and practices to help ensure suppliers comply with our Supplier Code of Conduct. We treat all our suppliers impartially and fairly. When entering into new supplier agreements, our Code of Conduct must be presented. Large contracts are awarded through tender competitions with equal conditions for all bidders. MMG, including all employees, must never offer or receive illegal or unlawful cash gifts – or other remuneration – in order to obtain commercial or private benefits for themselves or for the benefit of customers, agents

or suppliers. MMG and MMG's suppliers must avoid business partners with activities in countries subject to trade sanctions by the UN and/or Norwegian authorities.

REQUIREMENTS RELATING TO CONDITIONS IN THE SUPPLY CHAIN

1. Forced labour/slave labour (ILO Conventions nos. 29 and 105)

1.1. There must be no form of forced labour, slave labour or involuntary labour.

1.2. Workers must not be required to lodge deposits or their identity papers with their employer and are free to leave their employer after a reasonable period of notice.

2. Freedom of association and the right to collective bargaining (ILO Conventions nos. 87, 98, 135 and 154)

2.1. Workers, without exception, must have the right to join or form trade unions of their own choosing and to bargain collectively. The employer must not interfere with, obstruct or oppose trade unionisation or collective bargaining.

2.2. Trade union representatives must not be discriminated against or prevented from carrying out their trade union work.

2.3. Where freedom of association and/or the right to engage in collective bargaining are

limited by law, the employer must facilitate, and not hinder, alternative mechanisms for free and independent organisation and bargaining.

3. Child labour (UN Convention on the Rights of the Child, ILO Conventions nos. 138, 182 and 79, ILO Recommendation no. 146)

3.1. The minimum age of workers must not be less than 15 years and must be in line with (i) the national minimum age for employment, or (ii) the minimum age for compulsory schooling whichever is highest. If the local minimum age is set at 14 years in line with the exception in ILO Convention no. 138, this can be accepted.

3.2. There must be no new recruitment of child labour in violation of the aforementioned minimum age.

3.3. Children under the age of 18 must not perform work that is detrimental to their health, safety or morals, including night work.

3.4. Action plans must be established for the rapid phasing out of any child labour in contravention of ILO Conventions 138 and 182. The action plans must be documented and communicated to relevant staff and other stakeholders. Support schemes must be arranged where children are given the opportunity to study until they are no longer of compulsory school age.

4. Discrimination (ILO Conventions nos. 100 and 111 and the UN Convention on the Elimination of Discrimination against Women)

4.1. There must be no discrimination in respect of employment, pay, training, promotion, termination or retirement based on ethnic identity, religion, age, disability, gender, civil status, sexual orientation, trade union work or political affiliation.

4.2. Protection must be established against sexually intrusive, threatening, abusive or exploitative behaviour, and against discrimination or dismissal on unfair grounds, such as marriage, pregnancy, parenthood or HIV status.

5. Cruel treatment

5.1. Physical abuse or punishment, or the threat of physical abuse is prohibited. The same applies to sexual or other abuse and other forms of degrading treatment.

6. Health, Safety and Environment (ILO Conventions nos. 155 and Recommendation no. 164)

6.1. Steps must be taken to ensure workers a safe and healthy working environment. Hazardous chemicals and other substances must be handled responsibly. Necessary measures must be taken to prevent and minimise accidents and harm to health as a result of, or related to, conditions in the workplace.

6.2. Workers must receive regular and docu-

mented training in health and safety. Health and safety training must be repeated for new employees and relocated workers.

6.3. Workers must have access to clean sanitary facilities and clean drinking water. Where relevant, the employer must also provide access to facilities for the safe storage of food.

6.4. If the employer offers accommodation, it must be clean, safe and adequately ventilated with access to clean sanitary facilities and clean drinking water.

7. Pay (ILO Convention no. 131)

7.1. Workers' pay for a normal working week must as a minimum be in line with the national minimum pay regulations or industry standards, whichever is highest. Pay must always be sufficient to cover basic needs, including some saving.

7.2. Pay conditions and payment must be agreed in writing before work commences. The agreement must be understandable for the worker.

7.3. Deductions from pay as a disciplinary sanction are not permitted.

8. Working hours (ILO Conventions nos. 1 and 14)

8.1. Working hours must be in accordance with national laws or industry standards and must not

exceed the working hours laid down pursuant to applicable international conventions. Normal working hours per week must not normally exceed 48 hours.

8.2. Workers must have at least one day off a week.

8.3. Overtime must be limited and voluntary. The recommended maximum overtime is 12 hours per week, i.e. total working hours of 60 hours per week. Exceptions to this may be accepted if regulated by a collective agreement or national law.

8.4. Workers must always be paid an overtime supplement for working hours in excess of normal working hours [see 8.1 above] that, as a minimum, is in accordance with applicable legislation.

9. Regular employment

9.1. Obligations towards workers, in line with international conventions, national laws and regulations on regular employment, must not be circumvented through the use of short-term contracts [such as contract workers, casual workers and day labourers], subcontractors or other labour relations.

9.2. All workers are entitled to an employment contract in a language they understand.

9.3. Apprenticeship programmes must be clearly defined with respect to duration and content.

10. Marginalised population groups

10.1. The production and use of natural resources must not contribute to the destruction of the resource and income base for marginalised population groups, for example by occupying large areas of land, irresponsible use of water or other natural resources on which the population groups depend.

11. Environment

11.1. Measures to reduce negative impacts on health and the environment must be implemented throughout the value chain by minimising emissions, promoting efficient and sustainable use of resources, including energy and water, and minimising greenhouse gas emissions in production and transport. The local environment at the production site must not be overexploited or damaged by pollution.

11.2. National and international environmental legislation and regulations must be complied with, and relevant emission permits must be obtained.

12. Corruption

12.1. All forms of bribery are unacceptable, such as the use of alternative channels to ensure illegitimate private or work-related benefits for customers, agents, contractors, suppliers or their employees, and government officials.

