

SUSTAINABILITY POLICY

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1. PURPOSE AND SCOPE

This policy sets out the principles for how Møller Mobility Group (MMG) integrates sustainability across all its activities. It serves as a governance instrument and a guiding framework for responsible business conduct throughout the Group.

Sustainability for us means operating responsibly and long-term, with regards to people, the environment, and business.

We acknowledge that our operations and value chain may have adverse impacts on people, the environment and society. At the same time, sustainability topics also represent opportunities for us. Therefore, we work to ensure sustainable business practices that respect human rights, promote social justice, and protect the environment and climate.

This policy applies to all wholly owned companies in MMG and shall guide management, employees, business partners and suppliers.

2. ABOUT THE COMPANY AND STRATEGIC ANCHORING

MMG is a family-owned group engaged in the import, sales, service and financing of cars and mobility solutions in Norway, Sweden, Denmark, Estonia, Latvia and Lithuania.

Our history dates back to 1936, when Harald Aars Møller founded the company with one clear guiding principle: “Keep your path clean.” This motto has since served as a moral compass and remains the foundation of our culture, values, and approach to responsible business conduct.

Our values – “Honest and trustworthy”, “Clear”, “Proactive”, “Open-minded and caring” – serve as guidelines for how we build a sustainable business culture together.

Sustainability is also a clear and integrated part of our strategy. Through sustainable choices, we will develop people, delight customers, realize our full potential, and transform the company for the future.

3. ROLES AND RESPONSIBILITIES

Sustainability is embedded in the Group’s governance structure and reporting lines:

- The Board of Directors holds the overall responsibility for sustainability work and approves this policy, the strategy, and annual external reporting.
- Group Management is responsible for implementing the strategy and following up sustainability-related goals and measures. This includes:

- Determining material topics
 - Setting ambitions and targets
 - Operationalizing actions
 - Integrating sustainability into strategic decisions and risk management
 - Ensuring responsible business practices throughout the value chain
 - Monitoring and evaluating results
- The CFO and the Finance & Strategy department are responsible for financial and non-financial reporting, including quality assurance, internal control, and assurance. Legal compliance is followed up by the Legal department.
- The People & Sustainability department leads the operationalization of sustainability, including follow-up of material topics across the company.
- Business areas develop actions and KPIs supporting overarching goals and measures, reported tertially in business reviews.
- Expertise is ensured through training, collaboration forums, and close dialogue across the organization.

4. COMMITMENTS AND APPROACH TO SUSTAINABILITY

MMG applies a systematic and data-driven approach to sustainability, anchored in international standards and best practice. We commit to:

- Complying with applicable laws and international guidelines across our operations, including adhering to the UN Guiding Principles on Business and Human Rights, and international standards for labour rights, environment, animal welfare, and anti-corruption.
- Integrating sustainability into all parts of the business and value chain – from strategy and governance to operations and procurement.
- Conducting annual double materiality assessments to identify topics with impact and financial significance.
- Performing due diligence in line with the OECD Guidelines for Multinational Enterprises, including contributing to remediation where necessary.
- Updating the sustainability strategy annually and setting goals and actions within material topics – both at Group and business area level.
- Following up progress and results through tertial business reviews and Group reporting and implementing corrective actions when needed.
- Involving employees, unions, and other stakeholders in the development and execution of actions.
- Reporting externally in line with applicable legal requirements and relevant frameworks.

5. ENVIRONMENT AND CLIMATE

MMG has a responsibility to reduce emissions and resource consumption in its own operations and to contribute to minimized environmental impact in the value chain. Sustainable mobility and environmental responsibility are crucial for our future relevance and trust.

We will:

- Prepare climate accounting including Scope 1, 2, and 3 in accordance with the GHG Protocol and obtain third-party assurance.
- Disclose climate-related risks and opportunities.
- Work to reduce our carbon footprint in line with science-based targets and the Paris Agreement.
- Promote electrification of the car fleet and sustainable mobility in all our markets.
- Optimize the use of energy, water, waste, and other resources at our locations in line with ISO 14001 and other relevant frameworks.
- Minimize negative impacts on the environment, nature, and animal welfare.
- Promote responsible environmental behavior among employees.

6. SOCIAL RESPONSIBILITY

Our employees are our most important resource, and we have responsibilities toward people across the value chain. Social sustainability means ensuring a fully safe, health-promoting, and meaningful working environment based on fairness, inclusion, and respect. We also have responsibilities toward workers in the value chain, customers, and society at large.

We will:

Employees:

- Ensure fair working conditions in line with legal requirements and respect for human rights.
- Safeguard health, safety, and well-being.
- Maintain zero tolerance for discrimination, harassment, and unethical behaviour.
- Promote diversity, inclusion, and equal opportunities.
- Promote competence development and career development.
- Maintain safe and accessible whistleblowing channels.
- Facilitate dialogue and employee involvement.

Workers in the value chain:

- Set clear requirements for suppliers through our Supplier Code of Conduct, including ensuring responsible labour conditions.
- Follow ILO core conventions and our ethical guidelines.
- Conduct due diligence and contribute to remediation where necessary.
- Follow up suppliers based on risk and promote improvement.

Local communities:

- Contribute to local value creation, jobs, inclusion, and partnerships.
- Consider affected communities in operations, investments, or new establishments.

Customers:

- Deliver safe and reliable products and services.
- Protect privacy and data security.
- Be open and honest in marketing and communication, including avoiding greenwashing and pinkwashing.
- Enable customers to make more sustainable choices.

7. BUSINESS ETHICS AND RESPONSIBLE OPERATIONS

Good business conduct and responsible corporate governance are at the core of MMG's values. They strengthen trust in the company and form the basis for long-term value creation.

We will:

- Comply with laws and regulations in all markets.
- Maintain zero tolerance for corruption, money laundering, and financial crime.
- Handle personal data in accordance with legislation and internal guidelines.
- Ensure compliance with our Code of Conduct for employees.
- Ensure compliance with our Supplier Code of Conduct for suppliers.
- Integrate ESG considerations in investment decisions.
- Ensure sustainable procurement and supplier requirements.
- Work systematically with risk management and internal control for sustainability reporting.
- Work actively to ensure all subsidiaries and partnerships comply with our ethical standards.

Governing policy: Sustainability Policy

Approved by: MMG Board of Directors
Document holder: MMG Board of Directors

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8. REVISION LOG

Revision no.	Valid from	Comments / Key changes
001	01.01.2023	Newly established policy approved by the Group Board of Directors
002	01.03.2024	Updated in line with strategy
003	10.02.2026	Updated in line with strategy and new regulations, approved by the Group Board of Directors