



## Athlon International

### Code of Conduct

#### Company Profile

Athlon is a provider of vehicle leasing and fleet management. We have developed mobility solutions for over 100 years. We supply vehicle leasing and mobility solutions to meet the continuously changing needs of our customers.

#### Why and for Whom?

This code is intended to increase awareness of management and employees on fair business practices. This is done by documenting what is being considered as appropriate and inappropriate behavior. This code applies to every employee, director or officer in our company. Contract staff working for our company must also follow the code. Contractors and consultants who are agents of, or working on behalf of, or in the name of our company, are required to act consistently with the code when acting on our behalf.

#### Compliance with Law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws and regulations. We expect our employees to be ethical and responsible at all times.

#### Anti-Bribery and Corruption

We build relationships based on trust, and we are determined to maintain and enhance our reputation. For this reason, we never accept or pay bribes, including facilitation payments.

#### Gifts and Hospitality

We may not encourage, ask for or demand gifts and hospitality from business partners, or offering to them, especially those you would not be comfortable telling your manager, colleagues, family or the public that you had offered or accepted. In particular, we should avoid to allow gifts and hospitality, either offered or received, to influence our business decisions or give other people a reason to suspect there might be an influence.

#### Conflicts of Interest

Conflicts of interest may arise when personal relationships, participation in external activities or an interest in another venture, could influence or be perceived by others to influence our employee business decisions. A case of conflict of interest might jeopardize our company and employees' reputation. We must avoid actual, potential or perceived conflicts of interest if possible.

#### Fair Competition and Antitrust

Antitrust laws protect free enterprise and fair competition. Supporting these principles is important to us, and we expect our employees to play their part in combating illegal practices. These include price-fixing, market sharing, output limitation or bid-rigging, and anti-competitive or monopoly practices. We do not, for example, enter into any kind of inappropriate conversation or agreement with our competitors. We comply with all aspects of the Antitrust laws.

The Athlon International Code of Conduct is based on the Mercedes-Benz Integrity Code and Mercedes-Benz Responsible Sourcing Standards, which are applicable for Athlon Group.

Athlon Car Lease International B.V.  
Schiphol, January 2023

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Christian Schöler  
CEO

Alexander Heijkamp MBA  
Sustainability and CSR Director