

# **Norwegian Transparency Act Statement 2023**

**INTERRENT AS**

# Contents

- 1. Background 3
- 2. Our Organization 3
  - 2.1. At Group level 3
    - 2.1.1. Group structure 3
    - 2.1.2. Group value chain 4
  - 2.2. In Norway 4
    - 2.2.1. Interrent AS 4
    - 2.2.2. Interrent AS's place in the value chain 5
- 3. Risk Assessment 5
  - 3.1. Methodology for assessing risks 5
  - 3.2. Identified risks 5
    - 3.2.1. At Group level 5
    - 3.2.2. In Norway – Interrent AS 6
- 4. Internal mechanisms intended to manage risks 6
  - 4.1. At Group level 6
    - 4.1.1. Policies 6
    - 4.1.2. Grievance mechanisms 6
    - 4.1.3. Risk prevention 6
    - 4.1.5. Risk mitigation measures within the activities across the Group 7
  - 4.2. In Norway – Interrent AS 8

## 1. Background

Pursuant to Section 5 of the Norwegian Transparency Act, applicable to INTERRENT AS, the following statement is intended to comply with the legal requirements provided for in the Act. Europcar Mobility Group has anchored the responsibility to respect Human Rights in global policies that apply to all aspects of the Group's operations, including the operations of INTERRENT AS. This statement therefore details INTERRENT AS's commitment to human rights and decent working conditions.

INTERRENT AS is an enterprise resident in Norway which fulfills the requirements for “larger enterprises” as set out in Section 3 of the Transparency Act and so it is directly subject to the obligations of the Norwegian Transparency Act.

This report was approved by the CFO of Europcar Norway, André Bjørndahl, on November 6<sup>th</sup> 2023.

INTERRENT AS is fully committed to fulfill its requirements of compliance with International Human Rights standards under the Transparency Act. The present report describes measures taken by INTERRENT AS to address human rights impacts for the financial year 1 January – 31 December 2023.

To address its compliance with International Human Rights standards, the Europcar Mobility Group Code of Ethics and Commitments is based on multiple international frameworks. Therefore, through this Code developed at Group level and applicable to all subsidiaries, INTERRENT AS is committed to comply with the human rights principles, values and requirements laid out in the following texts, as detailed in the Code:

- The United Nations Universal Declaration of Human Rights.
- The European Convention on Human Rights.
- The Conventions of the International Labor Organization, in particular Conventions 29, 105, 138 and 182 (on child labor and forced labor), 155 (occupational health and safety), 111 (discrimination), 100 (equal remuneration), 87 and 98 (freedom of association, right of association and collective bargaining).
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;
- The United Nations Convention on the Rights of the Child.
- The principles of the United Nations Global Compact
- The French Law on the Duty of Care
- The German Supply Chain Due Diligence Act.

As such, compliance by INTERRENT AS with legal requirements in Norway is an additional reflection of a holistic Group-level approach in preserving human rights wherein every group subsidiary must comply with internal policies developed at Group level but also with local requirements that intend to preserve such rights in the countries where they operate.

## 2. Our Organization

### 2.1. At Group level

#### 2.1.1. Group structure

Europcar Mobility Group is a major player in mobility markets, European N°1 in vehicle rental. We offer a wide range of car and van rental services – be it for a few hours, a few days, a week, a month or more, for both individuals and businesses – with a fleet equipped with the latest engines, and which will be increasingly “green” by the end of 2024 and onwards.

We operate brands dedicated to different needs and uses cases. Our 3 major brands are:

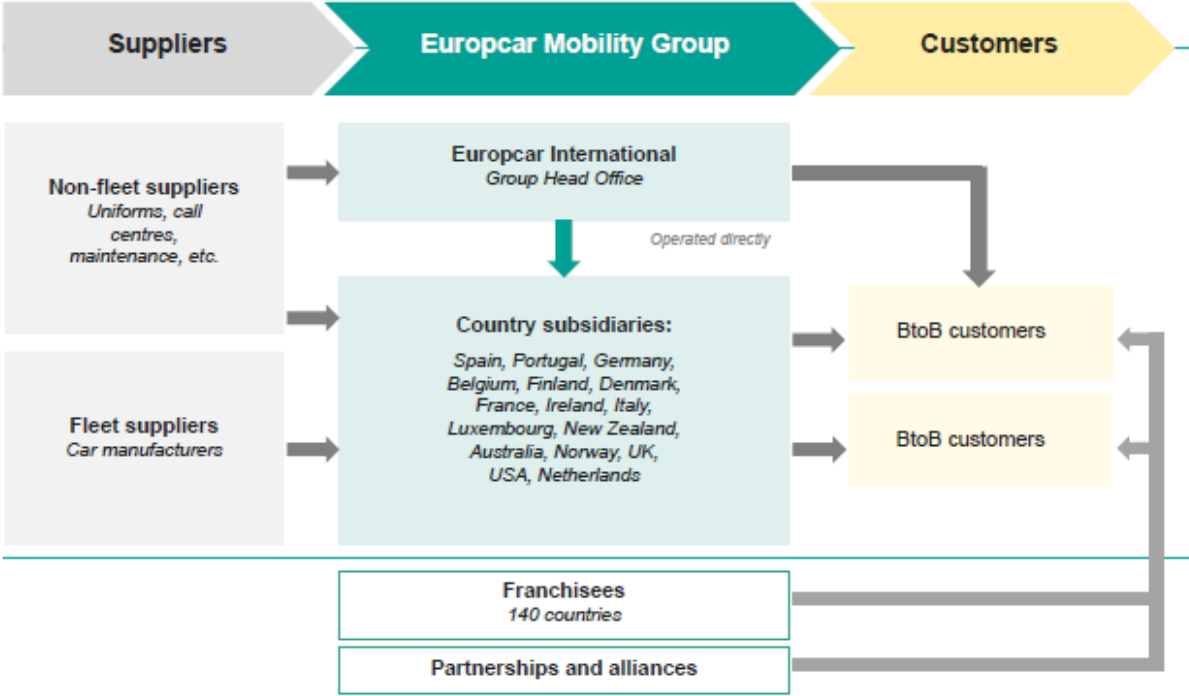
- Europcar®: The European leader of car rental and light commercial vehicle rental
- Goldcar®: The low cost car rental Leader in Europe
- Ubeeqo®: One of the European leaders of roundtrip car-sharing (BtoB, BtoC)

Europcar Mobility Group delivers its mobility solutions worldwide through an extensive network in over 140 countries (including wholly owned subsidiaries – 13 in Europe including one in Norway, 1 in the USA, 2 in Australia and New Zealand – completed by franchises and partners).

#### 2.1.2. Group value chain

Europcar Mobility Group addresses more than 5 million customers worldwide and develops offers for B2B and B2C customers.

It provides its services both directly and through partners and franchisees. Its business draws on a large network of suppliers (more than 18,000) located worldwide.



## 2.2. In Norway

### 2.2.1. INTERRENT AS

INTERRENT AS, a wholly owned subsidiary of Europcar Mobility Group is headquartered at Edvard Griegs veg 47, 2060 Gardermoen in Norway. The company is a transport solutions organization providing car rental and mobility services.

The company has 10 car rental stations located in Bergen, Evenes, Oslo, Stavanger, Tromsø, Trondheim. Operations at each of the stations include short term car rental. The company also has corporate offices located in Asker and Gardermoen. Operations at corporate offices include management of the business. In total, we employ approximately 60 people in Norway.

### 2.2.2. INTERRENT AS's place in the value chain

As a subsidiary of Europcar International, INTERRENT AS's suppliers are the same type of fleet and non-fleet suppliers as for its parent company. In addition, Europcar International is also a supplier of INTERRENT AS.

## 3. Risk Assessment

### 3.1. Methodology for assessing risks

To map the risks associated with human rights and decent working conditions at group level (then declined by country), the following methodology was used:

- Interviews with internal and external stakeholders to identify risks on the Group's value chain.
- Based on the scenarios identified, a risk assessment and rating method - aligned with both market standards and the Group's risk mapping methodology - was applied.

The risks identified cover the full value chain and all the stakeholders in the Europcar Mobility Group ecosystem: employees, customers, subcontractors, suppliers, shareholders, trade unions and other third parties.

This approach has been applied to Europcar Mobility Group's businesses and services in all the countries where the Group has operational and supply activities (corporate countries), including Norway.

### 3.2. Identified risks

#### 3.2.1. At Group level

At the end of the mapping exercise for the risks connected with fundamental human rights and decent working conditions at Group level, the risk scenarios for the relevant subjects were consolidated and grouped into 8 macro-risks, presented in the following table:

<b>HUMAN RIGHTS</b>	<ul style="list-style-type: none"><li>• Protection of personal data</li><li>• Whistleblowing</li><li>• Violation of labor law</li></ul>
<b>FUNDAMENTAL FREEDOMS</b>	<ul style="list-style-type: none"><li>• Discrimination</li><li>• Violation of trade union rights</li></ul>
<b>HEALTH &amp; SAFETY AT WORK</b>	<ul style="list-style-type: none"><li>• Psychosocial risks</li><li>• Breach of the safety obligation</li><li>• Harassment</li></ul>

#### 3.2.2. In Norway

As it can be seen in Section 2.3, INTERRENT AS is integrated into Europcar Mobility Group's supply chain, with the addition that the parent company also supplies INTERRENT AS. Based on the Group-level duty of care risk map, to date, we have not identified actual or potential adverse impacts of INTERRENT AS's operations in Norway.

For 2024, an action plan for a more in-depth risk assessment for INTERRENT AS will be implemented. It covers the specific requirements set out under the Transparency Act and describes what measures INTERRENT AS specifically will implement in order to identify and prevent adverse impacts in INTERRENT AS's own operations and supply chain. This includes a calendar for the process, local risk mapping of business partners, internal resources and specific follow-up measures.

## 4. Internal mechanisms intended to manage risks

### 4.1. At Group level

#### 4.1.1. Policies

As a Norwegian subsidiary of Europcar Mobility Group, INTERRENT AS is committed to upholding the Group's global policies. The Group explains its approach to human rights in the Europcar Mobility Group's Code of Ethics and Commitments (can be accessed at: <https://europcar-mobility-group.com/compliance>), and the Europcar Mobility Group's Duty of Care Plan which will be annually published starting 2023. The Group is also working on elaborating a Group-level procedure for CSR third party assessment under which INTERRENT AS would operate.

Central to the Group's approach on human rights is the belief that a zero tolerance policy applies within our operations and our supply chains anywhere in the world with respect to child labor, human trafficking, or other illegal, abusive or forced labor practices, as well as working conditions contrary to human dignity. INTERRENT AS follows this policy.

#### 4.1.2. Grievance mechanisms

In our Code of Ethics and Commitments, we encourage employees and stakeholders to report potential concerns or violations of laws, regulations or internal policies through our different reporting channels. For external stakeholders, the way to access the Group to make a report is through our Whispli form : <https://europcar.whispli.com/lp/ethics>.

Whispli is available 24 hours a day and is a confidential channel for any party that may have a legitimate interest to report serious complaints. Europcar Mobility Group upholds a strong non-retaliation policy that prohibits retaliation as much as attempts and threats of retaliation, any type of discrimination or disadvantage related to any report made. The Group is strongly committed to promoting a speak up culture, and this includes reporting on any human rights violation or indecent working conditions.

#### 4.1.3. Risk prevention

##### 4.1.3.1. Prevention structure

Europcar Mobility Group ensures the prevention of risks related to human rights by mobilizing "three lines of defense":

- The first line (first level of control) is secured by the operational players who guarantee compliance with internal procedures and rules in the day-to-day conduct of business.
- The second line (second level of control) is provided by Europcar Mobility Group's Internal Control Department, which conducts a self-assessment campaign on CSR topics. The internal control framework has recently been the focus of a substantial update, including controls relating to CSR and human rights. The Departments in question (Compliance and CSR) have been asked to contribute.
- The third line (third level of control) is handled independently by the internal audit teams. Within this framework, the overall effectiveness of the system and all its components is assessed through its audit missions in order to guarantee the Group's compliance with the law.

##### 4.1.4. Prevention mechanism – Third party assessment

As stated in the introduction, Europcar's Code of Ethics and Commitments brings together the principles and values governing the operations and decisions taken by the Group on social issues, human rights, labor law, business ethics and respect for the environment. In application of these commitments, the Group is developing a specific assessment procedure for third parties in order to select reliable and trustworthy business partners relative to CSR topics which include human rights and decent working conditions.

The policy for assessing a supplier's CSR risk relies on the use of the Syndecision platform/CSR module, which is connected to the EcoVadis database (the CSR module has been implemented at the end of 2022).

A graduated and proportional rationale has been adopted in order to allow the most in-depth assessments to be carried out only for suppliers who require them.

The final assessment on the supplier will determine whether or not to enter into a contact. The supplier may also be offered monitoring and support so that corrective measures can be put in place.

#### 4.1.5. Risk mitigation measures within the activities across the Group

The following measures have been established to mitigate the risks identified through the risk assessment (see Section 3.2.1).

##### **4.1.5.1. Data protection**

Europcar Mobility Group has adopted a compliance process in relation to the European Regulation on the Protection of Personal Data (GDPR).

##### **4.1.5.2. Promoting and guaranteeing social dialogue**

Owing to its international dimension, the Group is required to comply with numerous and varied local labor laws, which are often more restrictive than the directives of the International Labor Organization, with which the Group complies de facto.

##### **4.1.5.3. Diversity and inclusion**

Europcar Mobility Group has made the diversity of its workforce one of its assets; without any discrimination based on gender, age, origin, disability or sexual orientation. Moreover, this is one of the key principles of its Code of Ethics and Commitments (promoting equal opportunities for all).

In recent years, two main drivers have been introduced to promote diversity and inclusion: the WeMob internal network and a diversity and inclusion awareness program.

##### **4.1.5.4. Discrimination**

On the specific issue of discrimination, the Group is committed to comply with local anti-discrimination regulations and laws and to preventing any form of provocation, harassment or intimidation.

Lastly, a Group harassment contact person was appointed at the end of 2019 to deal with all issues related to this subject and an alert line is in place to ensure that all employees are able to report acts of harassment.

##### **4.1.5.5. Health and security at work**

To prevent and reduce risk factors, the Group has instituted a series of regulatory, normative and/or proactive measures and procedures listed below:

- Regulatory measures: The Group's subsidiaries concerned are also required to keep an up-to-date Single Risk Assessment Document which incorporates the inventory, assessment and actions implemented to prevent the risks associated with its activities.
- Normative measures and third bodies: when these aspects are not governed by local regulations, Europcar Mobility Group has initiated, depending on the country, either certification processes or partnerships with third bodies to define its health/ safety policies.
- Proactive measures: in other Country subsidiaries, dedicated procedures have been set up, where necessary, to assess, analyze and prevent occupational health/safety risks.

#### **4.1.5.6. Harassment**

Like discrimination, Europcar Mobility Group condemns any form of harassment of its employees. The action plans are supported by training modules (e.g.: "Discrimination, Harassment, Bullying and Diversity Training").

A Group harassment officer was appointed at the end of 2019 to deal with all issues relating to this subject, and a whistleblowing hotline has been set up to ensure that any employee can report acts of harassment.

## **4.2. In Norway – INTERRENT AS**

In addition to the Code of Ethics and Commitments, most of the Group's Country Subsidiaries also have formalized internal non-discrimination policies and deploy appropriate action plans.

In all its Country Subsidiaries, the Group complies with the local laws and regulations with regard to health and safety in the workplace, and sets up dedicated committees, when required.

In addition to the Code of Ethics and Commitments, which contains the rules by which employees undertake to respect with regard to harassment, most of the Group's corporate countries have also introduced policies and action plans on the subject, with the aim of preventing any form of provocation, harassment or intimidation.

In addition, throughout 2024, INTERRENT AS will carry out the necessary procedures to mitigate the possible risks detected through the specific risk assessment that will be conducted in this subsidiary. These procedures include performing Human Rights due diligence at subsidiary level concerning its specific activities and those of its business partners.

INTERRENT AS's due diligence process will be based on the due diligence process methodology developed at Group level and follow the guidelines set out in the Transparency Act and the OECD Due Diligence Guidance for Responsible Business Conduct.

The results of the risk analysis that will be performed throughout 2024, will form the basis for identifying appropriate measures regarding safeguarding human rights and decent working conditions. Indeed, the results of the analysis will nurture the relevant action plans to create and, where necessary, cease or correct the relevant activity to reflect the changing demands in our due diligence processes.

If INTERRENT AS causes or contributes to an adverse impact on human rights and decent working conditions, corrective measures will be implemented to prevent, stop or mitigate the extent of the violation, and stakeholders impacted by the activity will be engaged in dialogue.

INTERRENT AS acknowledges that it has not yet fully fulfilled its obligations pursuant to the Transparency Act. However, it is motivated to diligently working towards reaching the entire objectives set forth by this law.